



Nature Vancouver

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Vancouver Natural History Society since 1918

www.naturevancouver.ca

Nature Vancouver RBT2 Submission to Impact Assessment Agency of Canada – Our members do not want approval of Terminal 2.

Nature Vancouver, with close to a thousand members, represents a naturalist community with focus on the well-being and conservation of nature, as well as enjoyment of nature, fostering public interest and nature education.

We write to express our concerns that the conditions proposed for the Roberts Bank Terminal 2 will not reduce its full impacts. The proposed port expansion will bury 177 hectares of highly productive estuarine habitat and will remove the depth of its water column during higher tides.

This would be a huge loss to critical fish and marine habitat, such as Chinook Salmon and several other fish species, not to mention the Southern Resident Killer Whales. It puts at extreme risk wildlife habitat; in particular the biofilm mud flats essential for migrating shorebirds such as hundreds of thousands of Western Sandpipers, for the largest Canadian overwintering waterfowl congregation, and for other bird species including the resident Great Blue Heron.

Canada's own Environment Scientists in a final submission to the Environmental Assessment stated "project-induced changes to Roberts Bank constitute an unmitigable species-level risk to western sandpipers, and shorebirds more generally" in a document which was blocked by Johnathan Wilkinson, the then Environment Minister.

Such major losses cannot be compensated and mitigation proposed will not be adequate. The Fraser River Estuary is globally significant; it is the most Important Bird and Biodiversity Area in Canada.

The need for RBT2 has not been justified. Global Container Terminal Canada, the largest port operator in BC, has clearly stated that the VFPA has exaggerated container terminal needs. Our federal government has also committed to reduce Canada's export of coal and this should result in less space taken up by coal export operations at the existing Roberts Bank terminal, which could free up space for container shipping. There is also a proposal for expansion of container shipping at Port Prince Rupert.

Finally, the cumulative impacts of shipping throughout the Fraser Estuary and the Salish Sea have not been addressed.

We urge you to recommend that this proposed expansion not be approved.

Nigel Peck

President

for The Board of Directors and

Members of Nature Vancouver