



Open Letter to: Hon. Jonathan Wilkinson  
Minister of Environment and Climate Change Canada  
House of Commons,  
Ottawa, Ontario

June 18, 2020

Dear Hon. Minister Wilkinson:

**Re: Fraser Voices Review of the CEAA Panel Review Report on the RBT2 Proposal.**

On April 11, 2020 Fraser Voices issued a Press Release based on our early review of the March 27, 2020 Federal Panel Review Report for the Roberts Bank Terminal 2 Project. A copy of our press release is attached for your information. In that we now have done a more complete review of this large report we take this opportunity to summarize our major concerns. More detailed comments are attached as an addendum.

- ✘ The Panel did succeed in identifying most of the possible significant adverse and deleterious impacts of the RBT2 project. These impacts pose a major threat to the life in the Fraser River ecosystem and the very survival of the Fraser Estuary.
- ✘ Despite the above, the Review Panel totally failed to understand how this development was related to ecosystem functioning and the well-being of this overly stressed estuary and associated ecosystem as caused by 150 years of past developments. The panel failed to relate this to the major new fill project and its operating impacts on this extremely critical and unique habitat area.
- ✘ Further the Panel did not attempt to conduct an assessment of the impacts of RBT2 as related to all cumulative impacts affecting the estuary and indeed the entire Fraser River ecosystem. The Review Panel's report ignored much scientific input and did not relate the welfare of the entire river and its life (e.g. salmon) from the Nechako and Stuart/Takla Rivers to the estuary. The Panel apparently saw the Roberts Bank area as an isolated ecosystem and made no attempt to address the fact that the salmon in the Upper Fraser and elsewhere depend upon the estuary for survival. The First Nations upstream of the estuary depend upon the fish that depend upon estuary habitats and their protection. This is a simple concept that most should appreciate.

- ✘ The Review Panel substituted wishful thinking for sound judgment based on the science and experience associated with the effectiveness of impact mitigation works. Despite correctly predicting significant impacts the Panel then assumed that hopeful and often unproven habitat, fishery, waterfowl, etc. mitigation measures could eliminate all impacts to acceptable insignificant impacts. This was truly non-scientific.
- ✘ The review Panel externalized many management functions, remedial measures, research and monitoring needs to other levels of government including DFO, ECCC, First Nations and the Province. This does not appear to be a valid way of having a proponent address project impacts. The ethics and legality of allowing this offloading to take place has to be questioned.

**Based on the comments of Fraser Voices, experts, federal and BC conservation agencies, First Nations and the concerns of local governments, the CEAA Review Panel Report does NOT serve as the scientific, economic, common sense and public values foundation for the approval of this project in any form as applied for by the Vancouver Fraser Port Authority.**

**In that recent global events (e.g. COVID 19) must serve as a turning point in much of our thinking related to enjoyment of life, quality of life, global business and consumerism, the project is now even at a more critical cross roads at this time and now lacks the logic to be approved by our federal and provincial governments.**

**Dozens of small and some major impacts to the estuary and the Fraser River were ignored by the Panel. For instance the salmon up-stream of the 2018 Big Bar slide will take many years to restore once the slide passage problem is resolved. As of 2020 the slide and proposed port fill site are a threat to Fraser River Chinook salmon. As with most cumulative impacts, such ecosystem impacts were ignored by the Panel.**

**Alternatives do exist and it is strongly recommended that the taxpayer not support a project that in all probability will not be needed in the foreseeable future. This is indeed a project that is not based on a sound economic need and an evidence based scientific approach and a robust environmental review and should not be approved under any circumstance.**

Sincerely yours  
<original signed by>

**Otto E. Langer Fisheries Biologist**

**Chair of Fraser Voices Society** (on behalf of our Directors and Members)

**Copies to:** Lower Fraser MPs / DFO Minister Jordan /MOT Minister Garneau

Lower Fraser River MLAs, Premier Horgan / Minister Heyman / Fraser Basin ENGOS / Media