

The Waterbird Society



March 15, 2022

The Honourable Steven Guilbeault
Environment and Climate Change Canada

Re: Vancouver Fraser Port Authority Roberts Banks Terminal 2 Expansion

Dear Minister Guilbeault:

On behalf of the The Waterbird Society, I am writing to urge you to prioritize the protection of the Fraser River estuary and its shared migratory species. Due to the uncertainty around impacts of expanding the Roberts Bank Terminal to migratory shorebirds, especially the Western Sandpiper, we believe that the environmental risks posed by the Roberts Bank Terminal 2 Project will result in unavoidable and significant impacts to birds and other wildlife, including priority aggregations of shorebirds and the food and habitat resources they depend upon. We are an international scientific, not-for-profit organization dedicated to the study and conservation of waterbirds. This society was created to establish better communication and coordination between the growing number of people studying and monitoring aquatic birds, and to contribute to the protection and management of stressed populations or habitats of these species.

The Fraser River Estuary provides internationally and regionally important habitat for many species of seabirds and shorebirds, including nearly the entire world population of Western Sandpipers (*Calidris mauri*) and a wide range of sea-going and freshwater ducks. We are concerned that the Roberts Bank Terminal 2 expansion, as currently planned, will not protect the myriad birds reliant on this area. Construction will irreparably impact the ecological conditions that currently support a saltwater marsh, eelgrass, mudflats, juvenile salmon and other critically important fishes, migratory birds, and other species.

Environment and Climate Change Canada scientists and other independent scientists have previously provided abundant evidence that the proposed project will affect both biofilm quality and quantity on Roberts Bank, thereby threatening the entire estuarine foodweb upon which shorebirds and seabirds rely. The proposed RBT2 will inexorably alter the chemical and physical

aspects of the Roberts Bank estuary, and in so doing, will destroy the current balanced ecosystem, with negative cascading effects throughout the Salish Sea and beyond.

Each spring, migrating birds, including Western Sandpipers, stopover at Roberts Banks to prepare for their long flight to their breeding grounds. These birds feed on biofilm - the thin, dense, and slimy layer of predominantly organic substances that coats most intertidal mudflats, including those in the Fraser River estuary. A key component of that biofilm are diatoms, microscopic organisms that produce *de novo* essential polyunsaturated and highly unsaturated fatty acids, including eicosapentaenoic (EPA) and docosahexaenoic (DHA) fatty acids. EPA and DHA are extremely important not only to sandpipers for both migration and reproduction, but also for growth and reproduction of many animals in the marine food web. Marine diatoms are essential for maintaining a functioning food web at Roberts Banks.

It is important to note that, within the Fraser River Estuary, these high quality diatoms are in greater abundance in April at Roberts Bank than at any other nearby site. This is why the bank supports so many foraging shorebirds fueling up for migration - and why damaging the food web there will have serious repercussions.

If the mudflats where shorebirds now forage are altered, the removal of this unique source of essential fatty acids will severely affect numbers of shorebirds migrating, their reproductive success in Alaska, and essentially would disrupt their migration. Lack of marine diatoms would also negatively affect the entire food web, from zooplankton, to salmon and other fish, and to whales.

Across the North American continent, approximately 3 billion birds have been lost since 1970, and in Canada, shorebirds have declined by 40%. The Government of Canada's own scientists have highlighted how this project would lead to the collapse of the world's population of Western Sandpiper. In light of this, we urge you to reconsider the RBT2 project. Thank you for considering the views of ornithologists and for extending the comment period so that additional interested parties can provide their input on this important issue.

Very truly yours,

<Original signed by>

Jonathan Cohen
Chair, Conservation Committee, The Waterbird Society

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