

November 27, 2020

GCT Deltaport Expansion - Berth Four Project  
Impact Assessment Agency of Canada  
Suite 210A - 757 West Hastings Street  
Vancouver, BC V6C 3M2  
Email: [IAAC.Deltaport.AEIC@canada.ca](mailto:IAAC.Deltaport.AEIC@canada.ca)

GCT Deltaport Expansion – Berth Four Project  
B.C. Environmental Assessment Office  
PO BOX 9436 STN PROV GOVT  
Victoria B.C. V8W 9V1  
Email: [eaoinfo@gov.bc.ca](mailto:eaoinfo@gov.bc.ca)

To whom it concerns:

**Re: Proposed Delta Port Expansion Berth Four Project (DP4 Terminal Project)**

The Independent Contractors and Businesses Association (ICBA) is pleased to make this preliminary representation to the Impact Assessment Agency (IAA) and the BC Environmental Assessment Office (BCEAO) regarding the Initial Project Description for the DP4 Terminal Project in Delta, British Columbia.

By way of background, ICBA has been the leading voice of British Columbia's construction industry for 45 years, representing more than 3,300 members and clients who collectively employ over 100,000 people. ICBA advocates for its members in support of a vibrant construction industry, responsible resource development, and a growing economy for the benefit of all British Columbians.

On behalf of its broad membership base, ICBA undertakes public policy development and advocacy; sponsors apprenticeship and training for construction professionals; and provides group health and retirement benefit programs. Members are non-union or non-affiliated union contractors and businesses and, taken together, these two segments of BC's construction sector employment account for nearly 85 percent of the industry's workforce.

## **West Coast Ports – Critical Enabling Infrastructure for Canadians**

As Canada's only province on the west coast, British Columbia is uniquely positioned to benefit from inbound and outbound logistics activity related to containerized trade in goods and commodities.

Canada, as a small, open trade dependent jurisdiction, is highly reliant on our west coast ports to ship goods and commodities to domestic consumers throughout Canada and to international markets in the United States and the Asia Pacific. By volume, the Port of Vancouver is Canada's largest, while the Port of Prince Rupert ranks 5<sup>th</sup>.

Since 1995, containerized trade has grown steadily at container terminals in Metro Vancouver and the Fairview Container Terminal at the Port of Prince Rupert. This growth has resulted in a number of important benefits, including trade facilitation across a myriad of economic sectors, significant tax revenues for government, and construction and operational employment for workers in both Metro Vancouver and Prince Rupert.

Recent studies of medium- to long-term containerized shipping growth points to a need for additional capacity in BC ports. With the expected return to more 'normal times' in 2021 as COVID-19 vaccines become widely available along with expectations for further growth in two-way trade flows following the conclusion of the Comprehensive and Progressive Agreement on Trans-Pacific Partnerships (CPTPP) and the Comprehensive Economic Trade Agreement (CETA), now is an opportune time to plan and undertake regulatory reviews of options for adding container terminal capacity in BC.

It's important to note that incremental demand for terminal capacity can be handled – though at significant opportunity cost to Canadians and British Columbians – through US ports at Seattle, Tacoma, and Los Angeles. At stake for British Columbia and Canada under this approach is the loss of incremental economic growth, job creation, and tax revenue. At risk under this 'default option' is increased shipping costs and delays for businesses and consumers across the full spectrum of goods producing sectors. Simply put, it is in the national, provincial and local interest to ensure that unique trade and logistics opportunities are captured by BC's west coast ports, and not lost to competitors south of the border.

## **Concluding Comment**

Metro Vancouver's constrained land base, together with the *in situ* synergies with existing Delta Port facilities, means that land will likely need to be created near existing container port facilities to accommodate future growth in domestic and international containerized trade.

In this regard, ICBA fully supports thorough, independent regulatory review processes for significant port and infrastructure projects. This includes determining whether the Delta Port Expansion Berth Four Project is a suitable option for adding container terminal capacity to address expected growth towards the end of this decade and beyond.

We appreciate the opportunity to offer preliminary input on the Initial Project Description for the DP4 Terminal Project in Delta, British Columbia.

Should you have any questions, please don't hesitate to contact me or Tim McEwan, Senior Vice President – Policy & Stakeholder Engagement, ICBA.

Sincerely,

<Original signed by>

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Chris Gardner  
President

CC: Tim McEwan, Senior Vice President, Policy & Stakeholder Engagement, ICBA