

January 7, 2022

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Assessment of the GCT Deltaport Expansion - Berth Four Project
c/o Impact Assessment Agency of Canada/ Government of Canada
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**Subject: British Columbia Maritime Employers Association Letter of Support for
Deltaport Expansion, Berth Four Project**

To whom it may concern,

On behalf of the British Columbia Maritime Employers Association (BCMEA) and our membership, I am writing to comment on the proposed Joint Guidelines and express support for Global Container Terminals' (GCT) proposed Berth Four Project (DP4-The Project), a project that will add critical container capacity to west coast ports - ultimately enhancing Canada's economic competitiveness. This smart and environmentally-conscious phased expansion plan will add 2M TEUS of market-driven and privately funded capacity to GCT's Deltaport terminal. GCT is one of the largest maritime employers in the country and has been dedicated to serving Port of Vancouver over the past 100 years. GCT's Deltaport terminal is Canada's largest container terminal and has demonstrated success in operating with the utmost safety while implementing sustainable expansions. BCMEA believes that the DP4 Project will drive optimization of Canada's maritime system while ensuring transparency and alignment with Canada's national interest.

About the BCMEA

The BCMEA represents 49 waterfront employers and by extension, over 9,400 people working within the west coast port terminal facilities. Where ship meets shore, B.C. maritime employers are responsible for the safe movement of cargo and passengers through Canada's West Coast ports. Our members include ship owners and agents, stevedores, container and cruise ship terminal operators working out of ports from Victoria to the Alaska border. Our role is to help optimize our members' operations by contributing expertise in labour relations, safety and training, and recruiting. BCMEA member companies are a key contributor to the British Columbia and Canada's economies and are a mainstay of our coastal communities. The operations of BCMEA and its members supports 21,200 jobs across the nation. In 2020 alone, BCMEA members terminals handled \$180 billion worth of Canadian cargo. Per day, BCMEA

member terminals handled the movement of \$500 million worth of trade. Contributing \$2.7 billion in national GDP and by handling 16% of Canada's total traded goods, B.C.'s maritime employers are a vital link in the global supply chain and significant generators in the economic engine of Canada.

Marine Shipping

We would like to offer comment in regards to the recently released Draft Joint Guidelines for the GCT DP4 - The Project undergoing a Panel Review. Currently the Draft Joint Guidelines state:

"The Agency and the EAO have yet to determine the geographic extent of marine shipping incidental to the project, short sea shipping, and vessel movements associated with the Tsawwassen First Nation marina. In establishing the geographic extent for these physical activities, the Agency and EAO will consider comments received during the comment period, as well as comments received to date. To date, participants have indicated that the geographic extent of marine shipping incidental to the project should extend beyond the 12 nautical mile limit of Canada's territorial sea, such as to the 200 nautical mile limit of the Exclusive Economic Zone, and should also include Southern Resident Killer Whale critical habitat."

As noted in the Joint Guidelines, GCT considers marine shipping to be ancillary to the proposed Project despite being critical to the Project's operation. GCT's jurisdiction does not extend to management of marine shipping and it would be difficult to assess potential impacts and recommend mitigations beyond the 12 nautical mile limit.

As such, the BCMEA is of the view that the Project should limit Project-related marine shipping up to the territorial sea limit. GCT's ability to impose and enforce requirements on ships in Canada's 200 nautical miles exclusive economic zone (EEZ) is incredibly restricted. It is important to note that environmental assessments for similar projects have highlighted these challenges and have only included shipping to the territorial sea limit. As there is a lack of established shipping lanes beyond 12 nautical miles, an assessment of impacts would not be feasible nor realistic and would result in potentially significant inaccuracies.

It is BCMEA's recommendation that GCT not be required to assess marine shipping activities outside the 12 nautical mile limit, and that they do not make public recommendations to mitigate the effects as determined. It is the responsibility of marine carriers to manage marine shipping-related activities, and should the DP4 Project be approved, our members will continue to robustly and comprehensively manage their operations.

Safety & Training

We would also note that, as the training and recruitment providers of the B.C.'s waterfront workforce, BCMEA is readily able to ensure the workforce requirements of the proposed DP4 Project are fulsomely met. Annually, BCMEA invests in training initiatives across the province, providing training to nearly 6,000 waterfront workers. In 2021, despite immense operational challenges brought on by COVID-19, BCMEA successfully trained over 500 longshore recruits. In 2022, we will be investing a record \$36 million to recruit over 700 longshore workers to meet

increased labour demand for what is forecasted to be an all-time record year for cargo. Our members have also invested over \$35 million into our Waterfront Training Centre, near the Vancouver airport. This training centre simulates the terminal work environment and allows us to train workers in a controlled environment without impacting cargo operations at member terminals. Our training centre is the envy of ports across North America and capable of training hundreds of longshore workers annually. We are confident in our ability to train the waterfront workforce and safely supply the labour required for the DP4 expansion project and any additional investments in capacity for terminal infrastructure.

Thank you for your consideration and opportunity to comment.

Sincerely,



Mike Leonard
BCMEA President & CEO