



Image Courtesy Terry Carr

BC GREAT BLUE HERON SOCIETY

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RE: Global Container Terminals Inc. (GCT) Deltaport Expansion - Berth Four Project (#81010) –
public comment on the Draft *Canada-British Columbia Cooperation Agreement on the Coordination of*

the Environmental and Impact Assessment Processes for the GCT Deltaport Expansion – Berth Four Project (Cooperation Agreement) and the Draft Review Panel Terms of Reference (Terms of Reference).

Ladies and Gentlemen:

There is something fundamentally wrong with the highest level federal and provincial environmental assessment process if it can allow the consideration of a project that if approved would have international conservation consequences, in the absence of a fundamental plan to protect the nation's most important migratory bird habitat, the Fraser River estuary. This is a habitat we have pledged ourselves to protect, through our participation in many prestigious international conservation agreements, and we have gloried in that participation even as we seek to undermine those programs' integrity through our massive drive to industrialize the Fraser estuary.

Why is it that the government has the time and resources to husband yet another industrial proposal through the process, while it cannot seem to muster the resources to formally protect the estuary?

It is absurd for this agency to insist this discussion must only be about the terms of reference, when without that fundamental protection, moving the process along undermines the purpose of the process, to protect the environment. As such, this entire process is farcical in any sense of an equitable and substantive review, made even more outrageous by the fact that the government is still considering approval for both RBT2 and Tilbury LNG expansion in the estuarine area. RBT2 would be an ecological catastrophe that would destroy over 460 acres of habitat and would be sited a few hundred yards away from Deltaport Berth 4. Tilbury LNG is a significant threat to the lower Fraser River, and both projects are major threats to the endangered and highly stressed Southern Resident Killer Whales, whose critical habitat will be impinged upon by any more port development. Then we must consider the fiasco that is the TMX pipeline, an appalling desecration of the British Columbian landscape and an air-gasping waste of taxpayer money, destined to bring more traffic into the SRKW's critical habitat if it is ever completed. How can marine shipping be 'incidental' when every vessel impacts the endangered southern resident killer whales?

All of this while container traffic numbers decline, and the Port of Prince Rupert is expanding with significant capacity builds, yet there has never been a significant study and major plan for west coast port capacity, because it doesn't further the agenda of the Vancouver Fraser Port Authority.

How can a process such as your assessment proceed with any degree of integrity when the fundamental baseline information – a cumulative ecological assessment and a study of port capacity – are not required before any decision to even begin the costly, taxpayer-funded evaluation of more port expansion? And how can an assessment of a major project in B.C. proceed without significant input from provincial scientists and planners?

The philosophical intent of the assessment process is to give meaningful scientific and social licence consideration to proposed projects: but when a proposed project is yet another expansion of a port expansion that has continued unabated for half a century, despite irrefutable evidence of massive ecological loss and despite the warnings and protests of vast numbers of distinguished scientists and naturalists, conservation organizations and citizens, the entire production becomes a ridiculous parody, and the absurd pretence of including public participation is a cruel illusion. How, for example, can the scientists give any meaningful analysis of cumulative impact when there has never been a comprehensive estuarine study? How can a process claim public participation when the protests of the public and conservation organizations are noted and then ignored? What good is a review panel when their recommendations – dating back half a century - are ignored? A futile and costly waste of time, taxpayer money and staff resources.

Your office offers up more habitat destruction while scientists and citizens, warning of the imminent collapse of this entire ecosystem, have called for decades for a complete study of the Fraser estuary and an effective and meaningful layer of permanent protection. What the government of Canada should be doing is placing a complete moratorium on any more development in this estuary until these studies and some serious habitat protection has been put into place.

We thank you all for your attention to our concerns.

Yours very truly,
BC GREAT BLUE HERON SOCIETY
<Original signed by>

Gillian Anderson
Chair