

October 28, 2016

Debra Myles, Panel Manager – Roberts Bank Terminal 2 Project
Canadian Environmental Assessment Agency
22nd Floor, 160 Elgin Street
Ottawa, ON K1A 0H3

Via Email: Panel.RBT2@ceaa.gc.ca

Dear Ms. Myles,

Thank you for the opportunity to submit comments regarding the Environmental Impact Statement (EIS) and the Marine Shipping Addendum with respect to the Roberts Bank Terminal 2 project. The [Chamber of Shipping](#) represents the interests of ship owners, agents, and service providers responsible for over 65 percent of Canadian international trade by containers in Western Canada, including the Port of Vancouver. Our members view protection of the Canadian waterways as a priority and support several initiatives associated with research aimed at better understanding the impacts of commercial shipping and the development of best practices.

The Chamber of Shipping and its members support the development of Roberts Bank Terminal 2. While planned expansions of terminals in Vancouver and Prince Rupert should provide adequate short-term capacity, Terminal 2 will support the expected long-term growth of containerized traffic and the probable increase in size of container vessels. It should also encourage innovation, competition, predictability, while addressing aspects of congestion in the lower mainland.

The Chamber of Shipping members believe that the following principles are relevant to the successful completion of the project:

Minimizing Environmental Impact. The Vancouver Fraser Port Authority (VFPA) should continue to progress its exemplary and exhaustive work with respect to environmental impact. The Enhancing Cetacean Habitat and Observation (ECHO) Program is key to evaluating the impact of shipping on marine mammals and developing mitigation strategies, and has already resulted in tangible positive effects and increased awareness.

The project should also ensure that sufficient rail, road and short sea shipping infrastructure are in place in order to minimize congestion and keep additional Greenhouse Gas emissions to a minimum.

While not within the VFPA's mandate or jurisdiction, the Chamber is also supportive of integrated marine spatial planning that ensures that waterways are used in a sustainable manner and that risk is properly evaluated and mitigated. The current diverse approaches to oceans management are often confusing, bureaucratic, and ineffective.

Developing Innovative Technology. The Project should consider technology innovation not only to improve efficiencies and reduce operating costs, but also with an aim to achieve a carbon neutral status. The use of advanced technologies will support minimizing the impact of the day-to-day operations on the environment and surrounding communities.

Encouraging Competition. Roberts Bank T2 requires a proof of concept through participation of a private sector terminal operator. Such a proponent should provide competitive services and agreed service levels in order that current users of terminal facilities have options that will allow sustainable growth and return on investments that allow for innovation, thus driving new business to the port.

Minimizing Cost to Industry. Container capacity growth should be delivered from a lowest-all-in-cost perspective, thus ensuring a competitive position for Canada's Asia-Pacific Gateway and not exposing the already commercially challenged marine industry to additional costs. An exit strategy should be developed to address a possible situation where a suitable private sector project proponent is not found.

The Roberts Bank T2 Project is an essential element to developing the competitiveness of the Pacific Gateway and growing Canada's economy and foreign trade. This project will not only provide significant job opportunities and regional economic benefits, but will ensure the long-term competitiveness of the region in comparison to alternatives available in the United States.

Thank you again for the opportunity to submit our comments to the review panel.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Lewis-Manning', with a stylized flourish at the end.

Robert Lewis-Manning, OMM, CD, MBA
President
Chamber of Shipping