



INTERNATIONAL LONGSHORE & WAREHOUSE UNION CANADA

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The Honourable Steven Guilbeault, PC MP
Minister of the Environment and Climate Change
Fontaine Building 12th floor
200 Sacré-Coeur Blvd
Gatineau QC K1A 0H3
By Email: ministre-minister@ec.gc.ca

March 18, 2022

Dear Minister Guilbeault,

I am writing to formally request that you delay the final decision to approve or reject the construction of a new marine terminal at Roberts Bank in British Columbia (known as RBT2) as proposed by the Vancouver Fraser Port Authority until such time as a proposal by Global Container Terminals (GCT) to expand the Deltaport Terminal (DP4) has been subject to the same rigorous regulatory review process as the RBT2 proposal.

Both of these projects are generational and will take years and billions of dollars to build. We know that the RBT2 project also comes with a heavy environmental price, to say nothing of the cost to taxpayers of the proposal.

In these circumstances, with the review of the DP4 Expansion Project expected to be completed in two or three years, a short delay is a small price to pay to ensure the project that produces the best outcomes economically, socially and environmentally is chosen.

ILWU Canada has several concerns with the RBT2 proposal as it currently stands. Chief among them is the opaque plan concerning the degree to which the new terminal's operations will be automated. We note that the operator of RBT2 will be given complete latitude to operate the new terminal as it sees fit, including the potential of a fully automated facility. This raises serious questions about the economic benefits to Canada in terms of employment, taxation arising from the project as promised by the proponent.

According to an economic forecast by Prism Economics and Analysis commissioned by ILWU Canada, semi-automated marine terminal facilities operate with 50% fewer workers. Up to 90% of employment is lost when marine terminal operations are fully automated. The degree to which RBT2 is automated will have a material effect on the social and economic benefits this project will deliver and should cast doubt on the commitments of the proponent.

Uncertainty about the level of automation of RBT2 operations also renders the proponent's commitments of jobs and other economic benefits to Indigenous communities as notional at best.

Finally, the serious concerns raised by Environment and Climate Change Canada that some adverse effects of the proposed project will be "immediate, continuous and cannot be mitigated" should not be ignored.

In closing, we reiterate our request that your decision on the RBT2 proposal be paused until the Deltaport Expansion Project proposal has been reviewed. Doing so will allow an informed comparative analysis of the costs and benefits of each proposal.

Sincerely,



Rob Ashton
President

CC: Justin Trudeau, Prime Minister
Chrystia Freeland, Deputy Prime Minister of Canada
Omar Alghabra, Minister of Transport
Candice Bergen, Interim Leader of the Official Opposition
Jagmeet Singh, Leader of the NDP
Yves-Francois Blanchet, Leader of the Bloc
Seamus O'Regan, Minister of Labour
Bea Bruske, President CLC