

**BOUNDARY BAY CONSERVATION COMMITTEE**  
**Box 1251, Delta, B.C. V4M 3T3**

Ports Modernization Review  
Transport Canada  
November 29, 2018

**Ports Modernization Review**

The Boundary Bay Conservation Committee (BBCC) was established in 1988 to enhance public awareness of the Fraser River Estuary Ecosystem. We have worked with other conservation groups to obtain protection and recognition for this world class ecosystem including:

- BirdLife International's Important Bird Area (IBA) designation in 2001 for the Fraser River Estuary: Boundary Bay, Roberts Bank and Sturgeon Bank; the Estuary is the most significant IBA out of 597 sites in Canada.
- In 2004, the Western Hemisphere Shorebird Reserve Network (WHSRN) gave the Estuary its highest designation as a Hemispheric WHSRN Site.
- In 2011, Roberts Bank, the vital central link in this chain of inter-connected and protected estuary habitats, was finally declared a Wildlife Management Area.
- In 2012, the whole lower Fraser River Delta was declared a Ramsar site by the International Convention on Wetlands.

Since its inception, the BBCC has participated in numerous communications regarding port activities in the Vancouver area, in particular the lower Fraser River and estuary. We welcome this review of the role of Canadian ports and the opportunity for input on future port mandates and operations. The review is long overdue as proven by numerous submissions by the BBCC, and other groups, on port projects. Years of documented concerns over the port developments have been ignored.

**Recommendations:**

- 1. Tighten and define legal and accountable responsibilities of the Government of Canada in managing Canadian Ports. In particular, define the duties and responsibilities of the Minister and Ministry of Transport.**
  - By legislating authority to Canadian Ports, the federal government has contravened the principle of nondelegation which directs that a branch of government must not authorize another entity to exercise the powers which it is constitutionally responsible.
- 2. Abolish the current system of choosing Boards of Directors to manage Canadian Ports. Amend Section 20 of the Marine Act which delegates power to the Boards of Directors for the management of port activities.**
  - The current system contravenes federal government legal and open accountability.

**3. Terminate the current mandate of Canadian Ports.**

- Canada's shipping interests and efficiencies are being shunted aside for an agenda of using public assets to build a real estate empire with a focus on profits and business opportunities for vested interests.

**4. Remove the power of the Vancouver Fraser Port Authority (VFPA) to initiate, promote and/or participate in undisclosed agendas in collaboration with federal and provincial governments, as well as government bureaucrats.**

- Lip service is paid to public information and input. Plans and decisions are made behind closed doors and Projects are "done deals" before so-called public processes begin.

**5. Remove power of the Vancouver Fraser Port Authority (VFPA) to be a proponent and/or a permitting authority of major Projects that have negative economic, environmental, and social impacts.**

- The powers of the VFPA to grant permits is a serious abdication of legal accountability to the public, and Canadian laws. It is the job of responsible government agencies, not port employees.

**6. Remove power of the VFPA to conduct environmental assessments and mitigation/compensation programs.**

- There is no validity, or credibility, to delegating environmental assessments and programs to Canadian ports. It is a betrayal of the public trust with dire consequences.

**7. Redefine the role of port managers and introduce policies that provide the public with complete and accurate information.**

- The Vancouver Fraser Port Authority has become unresponsive to community concerns since the federal government granted near-autonomous powers in 2008. Information to the public and politicians is incorrect and deliberately misleading.

**8. Ensure Canadian ports operate in the public interest:**

- Canadian Ports operate as unregulated corporations exploiting public assets without public accountability. They are exempt from taxes and are granted project approvals without due process. Tax dollars fund infrastructure for port operations under the pretense of benefitting the economy.

**Recommendation #1: Tighten and define legal and accountable responsibilities of the Government of Canada in managing Canadian Ports. In particular, define the duties and responsibilities of the Minister and Ministry of Transport.**

**(a) Regulate accountability of the Minister and Ministry of Transportation**

A main concern is the refusal of the federal government to effectively and responsibly manage Canadian ports as required by law. Not only do federal politicians and staff ignore public concerns, but they also actively engage with ports to undermine environmental assessments and promote Projects. They operate behind the scenes which is in conflict of interest. The result is meaningless environmental assessments and lip service to legal requirements under environmental and constitutional laws.

In contravention of Canadian Constitutional Responsibility, the Minister of Transport refuses to manage Canadian ports and permits them to operate without any accountability to local governments or public concerns. A form letter is sent in response to public concerns stating:

***“...the federal government has no power to direct or influence the actions of Canada Port Authorities.... I would therefore encourage you to make your views known directly to Port Metro Vancouver ...”*** (Letters from Minister of Transport, January 18, 2016 and July 21, 2016)

The VFPA ignores views of the public and local governments.

**(b) Stop collaboration between ports and federal/ provincial politicians and public servants.  
Reform the process of inappropriate influence and post all information for public review.**

**(c) Require public input to expenditure of Canadian tax dollars for major port infrastructure.**

Currently, without public input, millions of federal tax dollars are used to provide infrastructure, some which creates traffic congestion and gridlock as well as inappropriate use of public lands.

**Recommendation #2: Abolish the current system of choosing Boards of Directors to manage Canadian Ports. Amend Section 20 of the Marine Act which delegates power to the Boards of Directors for the management of port activities**

The federally-appointed Board of Directors of the Vancouver Fraser Port Authority is chosen from supporters and promoters of vested interests. There is effectively no representation of local, social, environmental, or indigenous issues. The Board is invisible and its meetings, policies and decisions are not available to the public. The Board operates like a secret society.

**Recommendation #3: Terminate the current mandate of Canadian Ports**

The current mandate of the Vancouver Fraser Port Authority (VFPA) should be terminated as it has transformed port management into an unaccountable corporation working against the public interest.

- Under the guise of facilitating critical trade infrastructure, the Vancouver Fraser Port Authority is using its mandate to build a real estate empire focused on container imports. This is reflected in the fact that 47% of the port's operating revenue is from the container business i.e. property leases and port fees. In addition, millions of Canadian tax dollars are funnelled into infrastructure for containers with new facilities, upgraded roads and rail lines; power lines; and overpasses. The result is container congestion on Vancouver roads, bridges, and tunnels, as well as industrial and commercial lands stacked with empty containers.
- With most of the port's wealth earned from the container business fees and leases, it is the reason the port lobbies hard to borrow more money to increase land holdings, mainly for container enterprises. Ironically, 25% of containers are US bound and only 10-15% of containers are for the local area.

- Consequently, Canadian tax dollars are used to subsidize American-bound containers and to build infrastructure which is unnecessarily creating container congestion in Vancouver.
- As the container business is so lucrative for the VFPA, the port wants to dredge and fill the Fraser River estuary to build a massive second container terminal with 3 new berths at Roberts Bank. The VFPA is lobbying hard for the Project even though the new Terminal 2 is not required because Vancouver has enough container business capacity to almost double its current business. The Vancouver area container business is growing slowly and it will take decades to reach capacity.
- Since the formation of the Vancouver Fraser Port Authority in 2008, the management has switched from a facilitator of shipping and the movement of goods to become a real estate investor acquiring rich assets and servicing vested interests. The VFPA is a money-making venture which is permitted to borrow increasing sums of money to buy prime Vancouver-area lands, including properties in the Agricultural Land Reserve. The port has the power to overrule local zoning and expropriate lands.
- The VFPA has a real estate division which is buying up lands. In 2009, the port caused outrage when it purchased 198 acres of productive Richmond farmland in the Agricultural Land Reserve. It was able to do that because the federal government increased port borrowing capacity. The port owns the adjacent 690 acres of industrial land and is transforming an agricultural area into an industrial container complex. In 2017, the port purchased 340 acres of property for \$115 million. The port plans to purchase another 800 acres.
- **VFPA assets have doubled** since 2008, from \$887 million in 2008 to \$1.7 billion in 2017.
- VFPA income increased from \$40 million in 2008 to \$146 million in 2017.
- VFPA payments in lieu of municipal taxes went from \$5.1 million in 2008 to \$5.8 million in 2017 (a **decrease** from 12.7% to 4% of income)
- The port stipend to the federal government, instead of income taxes, went from \$4.8 million in 2008 to \$6.9 million in 2017 (a **decrease** from 12% to 4.7% of income)

**Recommendation #4: Remove the power of the Vancouver Fraser Port Authority (VFPA) to initiate, promote and/or participate in undisclosed agendas in collaboration with federal and provincial governments, as well as government bureaucrats.**

- All meetings, agendas and minutes should be publicly posted.
- An example of secret negotiations is the planning behind a massive bridge to replace the George Massey Tunnel which crosses the south arm of the Fraser River. The VFPA collaborated behind the scenes with government agencies and vested interests

- In reference to the highly controversial Trans Mountain Pipeline process, the VFPA inappropriately hosted and attended a meeting in the VFPA Boardroom on October 27, 2016. At the meeting, a high-ranking public servant of the federal Major Projects Management Office directed public servants from five government ministries to “give cabinet a legally-sound basis for saying, “yes,” to the Trans Mountain project.”  
<https://www.nationalobserver.com/2018/04/27/news/i-was-shock-says-government-insider-about-instructions-ensure-approval-kinder-morgan>

The VFPA which purportedly acts at arm’s length from government, was participating in government business. The VFPA was also in clear conflict of interest as it stands to benefit financially from the Project. The Westridge oil terminal is partially located on federal properties managed by the VFPA. The Port is responsible for approving permits to Kinder Morgan for the expansion at the Westridge Oil Terminal. The port also collects money from leases and port fees. This is a classic fox in the henhouse scenario which is ongoing.

**Recommendation #5: Remove power of the Vancouver Fraser Port Authority (VFPA) to be a proponent and/or a permitting authority of major Projects that have negative economic, environmental, and social impacts.**

It is inappropriate for the Minister of Transport to abdicate legal responsibilities and delegate projects and processes to port authorities, particularly when the ports, and vested interests, stand to gain from project permits, approvals, and commitments. Unfortunately, port authorities are currently in a position to abuse the powers of their mandate. The result is loss of due process and a failure to credibly assess and grant permits to projects. The economic, social and environmental consequences are crucial with irreversible loss of habitat, misspent tax dollars, and a degradation of quality of life.

To exacerbate lack of accountability, the Harper Conservative Government gutted environmental legislation in 2012 making it even easier for Transport Canada and Port Authorities to approve controversial projects. The VFPA changed from just a proponent of projects to a position of power to assess, approve and grant permits for its own projects and other projects on port lands.

In October, 2015, Canadians elected a Liberal Government which promised, “immediate restoration and strengthening of environmental laws.” As this has not happened, and damaging projects are proceeding, the only resort for the public is to take legal action. This would not be necessary if the federal government was sincere about protecting tax dollars, the environment, and communities.

Due process has not been followed for some Projects initiated and/or managed by the Vancouver Fraser Port Authority. Concerned citizens have protested and/or taken legal action:

- Communities and Coal, a group of concerned citizens, has found it necessary to go to court to attempt to overturn the Vancouver Fraser Port Authority’s approval of a coal transfer facility on the Fraser River. The Project will ship four million tonnes of US thermal coal through Lower Mainland communities every year. Lawyers representing the group claim the VFPA didn’t have the lawful authority to approve the Project. Also, executives of the VFPA publicly supported the Project before approval indicating a bias. In addition, the VFPA has a compensation scheme which gives incentives and bonuses based on project approvals.

- VAPOR, a group of concerned citizens, unsuccessfully challenged a Jet Fuel Project on the Fraser River citing lack of adequate public consultation and a flawed environmental assessment. When the proponents sought legal fees from VAPOR, Madam Justice Dillon ruled against the proponents stating the public had been:

***“..constrained by the law and disengaged from the environmental process.”***

This is what the public has to contend with due to ineffective federal legislation, lip service to due process and no accountability.

The VFPA issued a permit in March, 2016, for Panamax tankers to deliver fuels on the Fraser River. The VFPA didn't even inform the new Liberal Government that it was issuing the permit. That demonstrates the power of the VFPA which operates without federal oversight.

The irony is that the port has no public safety accountability beyond the Project footprint so who is in charge of jet fuel vessels on the Fraser River and where is it documented?

The VFPA has the power to issue the permit and the port will profit from the Project as it is located on port lands.

**Recommendation #6: Remove power of the VFPA to conduct environmental assessments and mitigation/ compensation programs.**

#### **Vancouver Fraser Port Authority (VFPA) close ties to Government Agencies**

It is inappropriate for the VFPA to be the Proponent for a new container terminal in the Fraser River Estuary (*Roberts Bank Container Terminal Project*) because of close ties to the federal agencies, particularly the Ministry of Transport. When bureaucrats and politicians come to Vancouver, they are hosted by the VFPA.

It is not possible for the Ministry of Transport to be unbiased due to close ties, so when it comes to permits and regulations related to navigable waters, dangerous goods, marine safety, accidents and spills, Transport Canada is in a position of bias, even conflict of interest.

Mining corporations will attest to the fact that they are subject to more rigid environmental assessments and regulations than government projects or agencies. They are required to submit credible Feasibility Studies and Cost/Benefit Analyses. This is not being required for the Roberts Bank Terminal 2 Project.

During the environmental assessment of the Deltaport Third Berth at Roberts Bank, lawyers from the Department of Fisheries and Oceans (DFO) advised the proponent, Vancouver Port Authority, how to avoid a Review Panel environmental assessment. This is a serious breach of due process. The DFO lawyers advised the Vancouver Port Authority (VPA) that if the planned second phase of the expansion were fully included in the cumulative effects study of the first phase, the project would need to be reviewed by an independent Review Panel. To avoid this, the lawyers recommended that the VPA write a letter to create uncertainty about the second phase even though studies and plans for the second phase were well underway. The lawyers then reviewed the letter.

Then DFO lawyers permitted the Vancouver Port Authority (VPA) to use this information and write the most important section of a report to the Minister of Environment. This section dealt with the critical issue of adverse cumulative environmental effects of the project. The report was supposed to have been authored by DFO and Environment Canada (EC) as Responsible Authorities managing adherence to the *Canadian Environmental Assessment Act (CEAA)*.

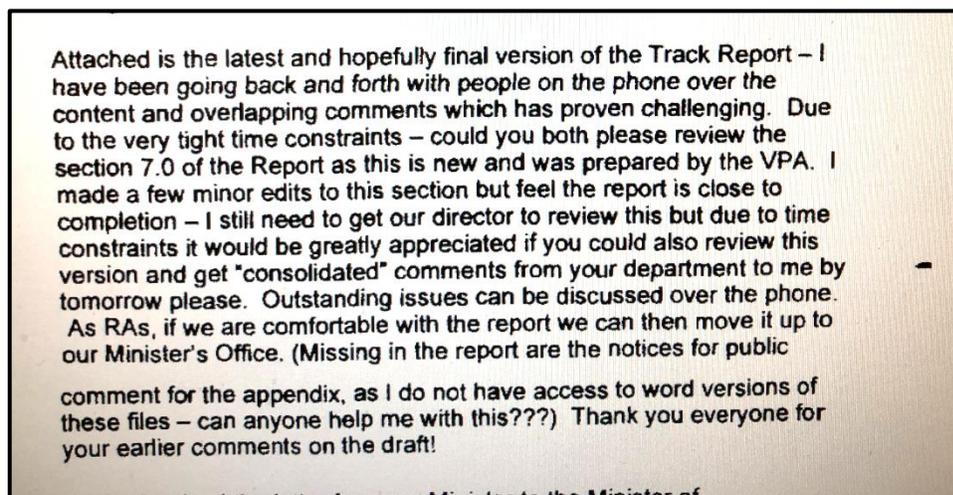
“From: XXX  
Sent: October 18, 2004 2:18 PM  
To XXX [PYRI]  
Subject: Deltaport .T2 and Cumulative Effects  
Hi XXX

I got a phone message from XXX this morning who sat in on the call between VPA and DFO on the issue of T2 and the cumulative effects assessment. According to XXX, the outcome is that VPA will be drafting a letter for review by DFO legal and EC on the issue. More on this after I speak with XXX in person tomorrow.  
Cheers  
XXX  
Environment Canada “

“From: XXXXX  
Sent: October 21, 2004 11:35 AM  
To: XXX[PYR]; XXX[NCR]; XXX[NCR]  
Cc: XXX[PYR]

Subject: FW: draft letter clarifying the status of Terminal 2  
Here is a draft letter from VPA explaining the likelihood of T2. I seek your advice on whether this letter would provide sufficient rationale to remove T2 from the cumulative effects assessment for Deltaport Third Berth Expansion Project, on the basis that it is hypothetical, rather than certain or reasonably foreseeable. Also, DFO has advised VPA that, with such a letter, T2 could be removed from the scoping document without the need to go back for public consultation. Are you in agreement with this? XXX”

November 18, 2004 internal federal email: names removed. Evidence that the Vancouver Port Authority (VPA) participated in the environmental assessment of the Deltaport Third Berth and even authored a section of the report to the Minister who made the decision to approve the project.



Attached is the latest and hopefully final version of the Track Report – I have been going back and forth with people on the phone over the content and overlapping comments which has proven challenging. Due to the very tight time constraints – could you both please review the section 7.0 of the Report as this is new and was prepared by the VPA. I made a few minor edits to this section but feel the report is close to completion – I still need to get our director to review this but due to time constraints it would be greatly appreciated if you could also review this version and get “consolidated” comments from your department to me by tomorrow please. Outstanding issues can be discussed over the phone. As RAs, if we are comfortable with the report we can then move it up to our Minister’s Office. (Missing in the report are the notices for public comment for the appendix, as I do not have access to word versions of these files – can anyone help me with this???) Thank you everyone for your earlier comments on the draft!

This is what goes on behind the scenes.

The environmental assessment for the Deltaport Third Berth Project (DP3) was a sham with lip service paid to public input. Scientific documents produced by the Boundary Bay Conservation Committee (BBCC) were ignored and there was no attempt by the Vancouver Port Authority, or the Canadian Environmental Assessment Agency, to respond. The consequences of that project, and years of port development at Roberts Bank, has been the loss and degradation of internationally significant habitat.

### **VFPA Inhouse Scientific Studies for Environmental Assessments**

The VFPA, as Proponent, should pay for independent scientific studies commissioned by an impartial body. With the current process, the port commissions studies from port-friendly companies. These companies cannot afford to produce adversarial reports. One or two main companies do most of the environmental studies and monitoring for the VFPA.

### **VFPA Mitigation and Compensation Plans**

The VFPA again uses port-friendly companies and organizations for mitigation and compensation plans and programs. Scientific information related to their mitigation and compensation is not available.

Monitoring and reporting on the Deltaport Third Berth (DP3) Project was not sufficient:

March 15, 2010 – email from B.C. Environment (*acquired through Access to Freedom of Information*)

“...reporting of fish and wildlife elements in the DP3 Project Reporting Updates from Hemmera continues to be grossly incomplete (despite repeated input over the last two years.”

“...Significant fundamental changes were made to the DP3 mitigation project package. ... News of the abandonment of efforts to attempt to stabilize the ever-increasing areas of the dendritic channel network in the intercauseway is of major concern to us. Notwithstanding the parameters related to mitigating the impacts of the DP3 project, this continuing habitat loss and erosion of mudflat, biofilm and eelgrass features is a de facto port development artefact. (here several sentences were blacked out) With respect to the dendritic channels, we realize it has been agreed that historic port development accountability has been discounted and cumulative effects generally of all port development apparently seem to be of similar prospect.”

### **Recommendation #7: Redefine the role of port managers and introduce policies that provide the public with complete and accurate information.**

Unfortunately, the VFPA, operates like a corporation focusing on promoting projects and activities, even if they are not in the public interest. The port appears to forget that it is entrusted with public assets in order to support Canada’s trade interests.

The CEO of the VFPA is a salesman and promoter. As the container business is so lucrative for the port and vested interests, campaigns are designed to promote growth in the container business at Vancouver ports. Instead the focus should be on all aspects of shipping including bulk, break bulk and autos.

Transport Canada should be orchestrating the best way for B.C. to manage the container business. Increasing container congestion, pollution and habitat damage in the Vancouver region is not the answer, particularly as it is unnecessary. The VFPA, with increased efficiencies and expansion of existing facilities, has enough capacity to handle nearly double the current container business.

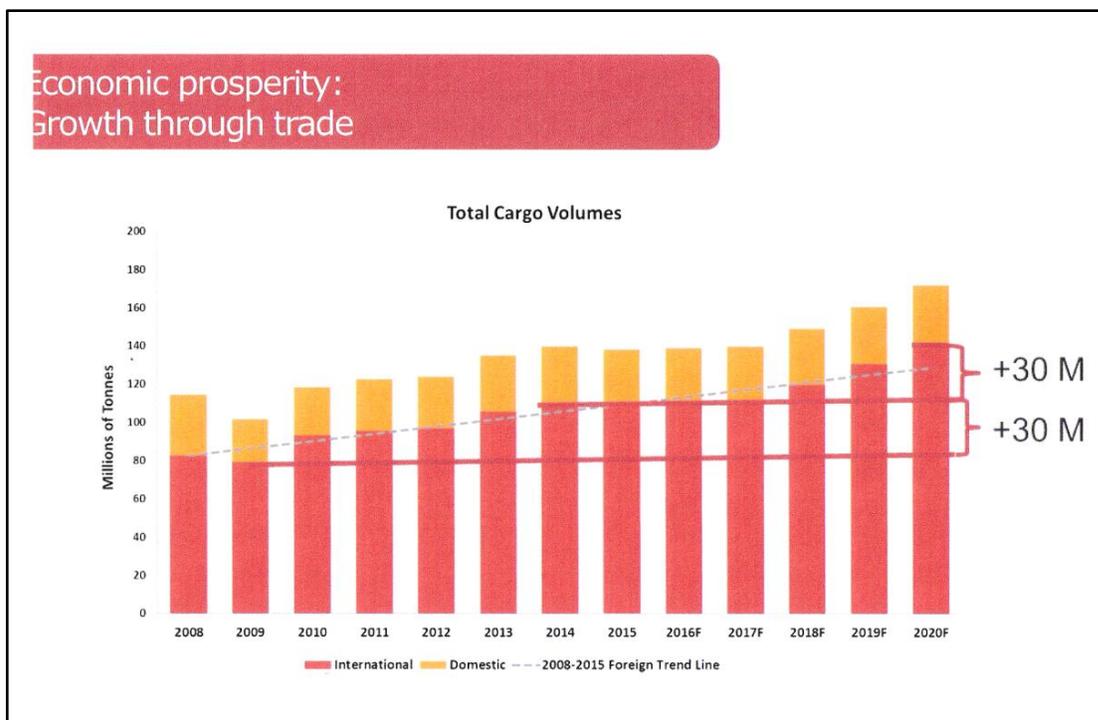
As the container business is growing faster in Prince Rupert, it makes sense that capacity expansions be built at that location. This was advised by three independent transportation experts in a 2008 report, 'Strategic Advisors Report, Asia Pacific Gateway and Corridor Initiative Report and Recommendations.' The experts, Burghadt, De Fehr and Turner, recommended that:

“...policy makers develop container capacity in Prince Rupert before making investments in Vancouver”...and further that: “...a systematic approach be taken to achieve an understanding of port capacity before a conclusion is reached that a particular port must necessarily be larger”

The VFPA ignores this advice even though the Compound Annual Growth Rate (CAGR) for the Prince Rupert Port Authority container business has been 20% over the past 9 years compared to the 3% CAGR of the Vancouver container business over the same 9 years.

In an attempt to push the agenda of buying up real estate and getting approval for a new container terminal, the VFPA, lobbies Ottawa, makes presentations to business interests, and produces promotional brochures. The propaganda fails to provide accurate and full information to justify the VFPA agenda:

- At a presentation dated May 24, 2016, Robin Silvester, CEO of the VFPA, showed the following graph:



**Graph shown in presentation by Robin Silvester, CEO of Vancouver Fraser Port Authority May 24, 2016**

Mr. Silvester explained that international trade at the VFPA had grown from 79 million metric tonnes in 2009 to 109 metric tonnes in 2014, an increase of 30 million metric tonnes. Then he claimed international trade would grow another 30 million metric tonnes by 2020. The graph shows a forecast increase of 10 million per year from 2018 to 2020.

There was no explanation of which commodities, or types of shipping, would yield this 27.5% increase in international trade from 2017 to 2020. The forecast additional 30 million metric tonnes by 2020 is not being realized. As of June, 2018, Vancouver's international trade has grown 2.9% this year. As the graph above shows, international cargo was flat from 2014 to 2016.

Mr. Silvester did not explain which commodities would be involved in the forecast surge in international trade. However, his presentation emphasized the need for more land and more container capacity, specifically Container Terminal 2 at Roberts Bank. The inference was that container capacity was needed due to the forecast of another 30 million metric tonnes in international trade.

An examination of the 30 million metric tonnes of growth in international trade from 2009 to 2014 shows that the container business grew by 5 million metric tonnes and since then has grown another 1.4 million metric tonnes. The graph and inferences were misleading.

This skewed information is an example of the spin-doctoring by the VFPA in the interests of promoting the container business because of the lucrative profits to be made by the port and vested interests.

- To influence politicians during the current Review Panel Environmental Impact Statement (EIS) for the Roberts Bank Container Terminal 2, VFPA secretly sent Confidential Briefing Notes to Government:

***“Welcome to our first newsletter, written exclusively for a government audience...”***

The newsletter claimed to present the FACTS in rebuttal to concerns submitted to the EIS by the public. The information presented was projections and assumptions stated without evidence. This kind of lobbying behind the scenes during a formal, federal process is unethical.

- Just recently, October, 2018, the VFPA produced a brochure, submitted to the Review Panel of the Roberts Bank Terminal 2 EIS as an updated rationale for the Project. Again the brochure is promotional material rather than evidential material. There is a quote from the Minister of Transport in the brochure followed by a claim of the need to dredge and fill the Fraser River Estuary for the planned Container Terminal 2. The inference is that the Minister's comments support the need for the new Roberts Bank Container Terminal 2. This propaganda is unethical as the Minister is a decision-maker for the Project and his Ministry is making submissions to the EIS. This kind of deceptive indoctrination demonstrates the public has no hope of a fair decision-making process as public servants and politicians uncritically accept VFPA's misinformation.
- The rationale information in the Environmental Impact Statement for the Roberts Bank Terminal 2 Project (RBT2) fails to justify the project because it is anecdotal, insufficient and inaccurate. Even the updated document omits published statistics which confirm sufficient container capacity without RBT2.

In its rationale for the RBT2 Project, the Vancouver Fraser Port Authority (VFPA) piggybacks the 20% Compound Annual Growth Rate (CAGR) of the container business in Prince Rupert in the last 9 years. The VFPA omits to disclose the slower 3% CAGR in Vancouver over the same 9 years.

Statistics for Vancouver's ports have been contradictory since the process began for an environmental assessment (EA) of the Deltaport Third Berth (DP3) in 2005. Port statistics changed from prior to the DP3 Environmental Assessment (EA), and subsequent to the EA. This has led to incorrect data in the RBT2 EIS, especially when compared to outside reports.

The Transportation Ministry is using questionable FVPA statistics in an October, 2017 Transport Canada Report, *'Evaluation of the Asia-Pacific Gateway and Corridor Initiative and the Gateways and Borders Crossing Fund'*. Statistics for container traffic capacity in Chart 7 of the document are similar to the data in the Roberts Bank Terminal 2 Project EIS. The chart shows VFPA container capacity of 4.8 million TEUs without Roberts Bank Terminal 2 (RBT2) which is incorrect and out of date. Updated sources demonstrate VFPA will have capacity of 6.08 million TEUs without RBT2. As a result of skewed data, Canada's Minister of Transportation is not, and will not, be equipped with full, accurate evidence in his decision on the Roberts Bank Terminal 2 Project.

The Boundary Bay Conservation Committee has documented these skewed statistics in a [submission to the Roberts Bank Terminal 2 Environmental Impact Statement](#). The information is referenced and presents evidence that the Project is not needed.

#### **Recommendation #8: Ensure Canadian ports operate in the public interest:**

- Canadian ports should be legally bound to adhere to federal, provincial and municipal laws and zoning.
- Prevent empire-building of port authorities
- Pass legislation that compels ports to operate in an open and transparent manner.
  - The FVPA does not publish full information.
  - If you visit the FVPA website, you will quickly learn that the type is illegible with small, light blue font. It is difficult, if not impossible, to read the Financial Reports for the past 2 years.
  - The VFPA refuses to disclose statistics for each port and percentage of US bound containers from each port.
  - All meetings, presentations and speeches should be documented and posted.
- Ensure that Ports publically acknowledge that they are privileged to manage public assets.
- Ensure that local governments have a strong voice in port operations.
- Terminate port stipends in lieu of taxes, port donations and grants. This process is abused as grants and donations have become a source of influence-peddling.
- For Projects, require ports to fund independent economic, social and environmental studies commissioned by an unbiased group.
- For Projects, terminate the in-house mitigation and compensation plans and require ports to fund plans which are to be commissioned by an unbiased group which will ensure the application of credible science.

Thank you for the opportunity to join in the conversation on how to best position Canada's Port Authorities for the future. BBCC requests that the Government of Canada reform the current management of ports with succinct legal accountability. Vancouver's highly successful shipping business should not be undermined with misinformation and mismanagement of the container sector.

Stringent laws, policies, regulations and practices are needed if Canada is serious about supporting and protecting the globally-significant Fraser River Ecosystem.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Jones". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Susan Jones  
Director: Boundary Bay Conservation Committee