

Government of British Columbia
Submission to the Transport Canada Ports
Modernization Review



B.C. SUBMISSION TO THE TRANSPORT CANADA PORTS MODERNIZATION PANEL
(December 2018)

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Ports Modernization Review

The B.C. Government is pleased to present this document as its submission to the Transport Canada's Ports Modernization Review.

We have successfully collaborated with the federal government on many transportation-related initiatives over the years, particularly in the last decade. While B.C.'s four federal ports are competitive, responsive to local communities, partners to local Indigenous groups and operate with a current mandate to protect the environment on their lands, there is opportunity to improve port operation and focus further on priority areas as identified by Transport Canada.

I convened the Western Trade Corridors Roundtable Forum on October 11, 2018. The Roundtable forum was held to build positive relations among governments and key stakeholders to ensure B.C. continues to strengthen its position in the Asia Pacific region in the coming decades. The outcome of the Roundtable confirmed that participants (including federal and provincial government, industry, Indigenous, community and labour leaders) are aligned in their interests to strengthen the Western Trade Corridors in a way that enables new economic activity while focusing on the principles of sustainability and strong communities.

This submission identifies nine recommendations for Transport Canada's consideration that support B.C.'s goals to make life more affordable for British Columbians, deliver services that people count on, and build a strong, sustainable, innovative economy. While these objectives, and the supporting recommendations, are B.C.-focused, they contribute to positive economic growth and job creation for Canada as a whole.

We appreciate the opportunity to provide input to this process and look forward to continuing to build on our record of successful collaboration with the federal government.

Respectfully submitted,



Claire Trevena

Minister of Transportation and Infrastructure

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Executive Summary and Recommendations

The B.C. Government has reviewed the scope of Transport Canada’s analysis and assembled this submission with discussion and recommendations on the areas of focus.

The B.C. Government believes the current arm’s length, financial self-sufficiency model is allowing Ports to operate effectively, safely and competitively on the world market. There are opportunities for improved collaboration between all levels of government and industry in port operations as well as in Indigenous partnerships. Balancing sustainability with a competitive port model and economy must continue to be a priority.

The recommendations proposed by the B.C. Government are as follows.

Number	Recommendation	Review Area
1	Tailor port modernization governance improvements to CPAs of all sizes	All
2	Maintain continued collaborative efforts that allow the CPAs to work with federal, provincial and local governments, industry, Indigenous groups, and local communities through modernization efforts	Trade Competitiveness, Innovation and Trade Logistics
3	Support CPAs’ use of technology to develop new supply chain management tools	Trade Competitiveness, Innovation and Trade Logistics
4	Provide CPAs with detailed principles and guidelines for meaningful engagement and partnership opportunities with Indigenous peoples	Partnering with Indigenous Peoples
5	Encourage greater Indigenous representation on each Port Authority’s Board of Directors	Partnering with Indigenous Peoples
6	Introduce measures to increase transparency of the environmental assessment process where CPAs are the sole environmental authority	Sustainability and Port Communities
7	Mandate CPAs to publish an emissions reduction strategy	Sustainability and Port Communities
8	Improve the financial flexibility of CPAs to support their competitiveness	Port Governance
9	Streamline the CPA board appointment process to ensure continuity in Port Authority governance	Port Governance

1.0 Introduction

Canada's ports are essential components of a competitive, sustainable economy that supports communities across the country. Ports are a critical part of Canada's trade corridors to global markets, which move goods and commodities safely, efficiently, and economically. While ports are federal authorities, competitive and sustainable ports require collaboration between the federal government, provincial governments, local communities, Indigenous groups, labour groups and industry stakeholders.

Transport Canada has initiated a review of the Canada Port Authorities (CPAs) to optimize their current and future role in the transportation system as innovative assets that support inclusive, sustainable growth and trade. The B.C. Government has reviewed the scope of Transport Canada's analysis and assembled this submission with discussion and recommendations on the areas of focus, including stakeholder perspectives where they have informed the B.C. Government's position.

There are four CPAs in B.C.: Vancouver Fraser Port Authority (VFPA), Prince Rupert Port Authority (PRPA), Port Alberni Port Authority (PAPA), and Nanaimo Port Authority (NPA). The CPAs were established under the *Canada Marine Act* as federally incorporated, autonomous, non-share corporations. Almost 98% of trade goods clearing B.C. are exported through its ports. In 2017, Canadian trade goods valued at approximately \$39.5 billion were exported by ship. More than half of these goods originate from other provinces and territories¹. Maintaining B.C. and Canada's trade competitiveness is dependent on ensuring ports operate effectively.

B.C. CPAs have been proactive in responding to the increase in North American trade traffic, with B.C. ports capturing 15.8% of the west coast's overall container traffic in 2017. The Port of Vancouver and Prince Rupert Port handled a record 4.18 million TEUs in 2017, representing a 66% increase compared to a decade ago. Pacific Northwest container volumes are projected to double over the next 30 years², which presents an economic opportunity for B.C. CPAs and Canada. The B.C. Government will continue to work with CPAs and the Government of Canada to ensure CPAs achieve sustainable growth.

This paper has been developed with three key provincial priorities in mind:

1. Making life more affordable for British Columbians;
2. Delivering services that people count on; and
3. Building a strong, sustainable, innovative economy that works for everyone.

Other priorities include advancing Indigenous reconciliation, promoting diversity and inclusivity, and investing in people and infrastructure to promote long-term growth. In particular, as ports evolve, maintaining well-paid jobs and a gradual transition for the workforce to adapt to new technologies is important.

¹ Source: Statistics Canada Trade Research Inquiry Package, 2018

² Container traffic was 8.1 million TEUs, and the base case is forecasted to be 17.5 million TEUs in 2045. Source: Ocean Shipping Consultants, [Container Traffic Forecast Study](#) – Port of Vancouver 2016.

The B.C. Government is actively working to develop priorities identified at the Western Trade Corridors Roundtable Forum on October 11, 2018. The priorities identified by participants at the Forum included a focus on coordinated government leadership, a Western Trade Corridors Strategy, a team approach to achieving opportunity and labour market certainty, and building and confirming partnerships with Indigenous groups, labour and communities.

This paper has been developed in consultation with stakeholders³. Engagement was undertaken between the B.C. Government and the B.C. CPAs, western provincial governments, labour groups and key industry groups to better understand stakeholder issues related to the five areas of focus, and how government can support the CPAs. The B.C. Government reached out to stakeholders to discuss key issues and potential mitigation strategies. Where relevant, this document includes a summary of stakeholder inputs. Stakeholder feedback was used to inform recommendations on topics where B.C. Government priorities align with stakeholder interests.

2.0 Areas of Focus and Recommendations

This report discusses the five review streams and provides recommendations under the four areas of trade competitiveness, partnering with Indigenous peoples, sustainability and community liveability and port governance. As those review areas overlap with safety and security (for example, with the importance of Indigenous partnerships), the B.C. Government's recommendations to that area are rolled up into the other discussion topics.

The recommendations presented in this paper result from research into the challenges faced by the Ports, and align with B.C.'s submission to the 2015 *Canada Transportation Act* Review. The current arms-length, financial self-sufficiency model encourages a competitive economy to develop that gets B.C. and Canadian goods to global markets. The current model is generally responsive to the needs of industry and local communities and allows for environmental management of federal port lands. However, improvements can be made to how CPAs function, govern their local port business, and interact with communities, Indigenous groups and industry organizations.

One common theme that arose during stakeholder engagement with B.C. CPAs, as well as associated industry operators and alliances, is that the current port governance model does not account for variation in size or throughput of CPAs. The B.C. Government believes that the "one size fits all" model presents challenges. CPAs in B.C. vary considerably in size in terms of vessel activity, cargo throughput, number of facilities and revenue generation. The challenges faced by the largest in capacity (Vancouver) are considerably different than the challenges faced by the smallest (Port Alberni and Nanaimo). Adjusting the model to be flexible for smaller and larger ports may better enable CPAs to fulfill their mandate.

³ The full list of stakeholders engaged is provided in Appendix A.

Recommendation 1 – Tailor port modernization governance improvements to CPAs of all sizes

The B.C. Government is supportive of improvements to the port governance model under the five review streams presented by Transport Canada. The B.C. Government suggests that alterations to port governance structure carefully consider how the changes will support the activities of each CPA, regardless of shipping capacity.

2.1 Trade Competitiveness, Innovation and Trade Logistics

Continued Collaboration

Collaboration between CPAs and federal, provincial and local governments, terminals, shippers, trucking and rail organizations, and Indigenous groups helps ensure that ports in B.C. are ready to serve growing demand. Collaboration and cooperation are facilitated through inter-governmental and inter-organizational bodies, such as the Western Trade Corridors Roundtable Forum, Pacific Gateway Alliance, the Western Transportation Advisory Council (WESTAC) and the Gateway Transportation Collaboration Forum. The B.C. Government will continue to contribute to collaborative efforts including the development of a new Action Plan with a shared vision for the Western Trade Corridors.

Stakeholders have said that collaboration has been most successful when it involves voluntary cooperation on new initiatives and avoids prescriptive actions (which can affect the ability of the CPAs to remain competitive). The B.C. Government agrees that collaboration is most successful when CPA, federal and provincial interests and priorities are aligned, and joint initiatives are undertaken with the intent of meeting shared goals.

Some stakeholders have encouraged the B.C. Government to lead collaboration when it comes to geographical considerations and localized environmental concerns. The B.C. Government is willing to work closely with the federal government on integrating local concerns that affect areas of federal jurisdiction, such as federal land and marine areas, into the new port governance structure. The B.C. Government encourages CPAs to continue to work together on sharing best practices on engagement strategies with local communities and industry, particularly where some CPAs have developed more detailed engagement strategies than others. Recognizing that the local community to each port has unique concerns and considerations, there are common threads to successful engagement strategies and importance to sharing lessons learned.

Recommendation 2 – Maintain continued collaborative efforts that allow the CPAs to work with federal, provincial and local governments, industry, Indigenous groups, and local communities through modernization efforts.

Supply Chain Data Sharing and Innovation

CPAs should continue to explore new technologies that support enhanced data and supply chain management. Data sharing is critical to the competitiveness of the trade corridors. Efficiency of trade movement will continue to improve as better data held by CPAs and industry organizations is made

available to share between CPAs, terminals and various transportation operators (road, rail and marine shipping). For example, the number of empty trips by trucks in the drayage sector could be reduced through improved scheduling and dispatching between terminals. This could result in travel time savings benefits for drivers and terminals, and would support governments' objective of reducing emissions.

Transport Canada should continue to play its important convenor role of bringing people together and use funding tools to promote initiatives. Transport Canada can also use its legislative and regulatory power to assist those efforts directly or indirectly.

Notwithstanding the existence of many ongoing initiatives (e.g., the Commodity Supply Chain Table and the new Canadian Centre on Transportation Data) that support supply chain innovation, there is an opportunity to do more. However, any new technology should be implemented with considerations for potential effects to the existing workforce within and adjacent to the ports. Well-paid jobs can be maintained with the correct implementation of new technology, by ensuring workers have the training to transition to new roles and introducing a gradual transition. Commercial sensitivity and data security (as raised by stakeholders) are major considerations for implementing supply chain innovation tools, both for CPAs sharing information and collecting information.

Recommendation 3 – Support CPAs' use of technology to develop new supply chain management tools

CPAs may benefit from having more detailed information on goods movement to support effective supply chain management and encourage effective movement of goods by different operators. Additional funding support for new technology may be needed, or tools to incentivize and encourage the uptake of new technology by terminal operators, drayage companies, railways, and shippers (e.g., to reduce inefficient trip routing for truck drivers, and encourage double-ended moves where possible).

2.2 Partnering with Indigenous Peoples

Indigenous Engagement Strategies

The B.C. Government is supportive of all work the federal government, including under CPAs, is undertaking to advance reconciliation with Indigenous peoples and encourages partnerships and economic development opportunities within Indigenous communities. The B.C. Government recognizes and mirrors Canada's 10 Principles Respecting the Government of Canada's Relationship with Indigenous Peoples, and the commitment to implementing the UN Declaration on the Rights of Indigenous Peoples (UNDRIP).

CPAs in B.C. strive to develop respectful and beneficial relationships with neighbouring Indigenous groups. All B.C. CPAs are within Indigenous traditional territories. As port lands fall under federal jurisdiction, CPAs have a duty to consult with Indigenous groups on projects that have the potential to impact Aboriginal interests. In addition, some CPAs in B.C. meaningfully engage with Indigenous groups beyond the project-to-project basis.

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The B.C. Government is engaged with Indigenous communities across B.C. on numerous trade and transportation related initiatives, including those in proximity to the port authorities. Through this engagement, local Indigenous communities have identified several areas of general concern with regards to port operations, including cumulative environmental and social impacts, impacts to archaeological, cultural, traditional use and sacred sites, and safety concerns. The B.C. Government recognizes the work that is ongoing at CPAs, especially larger CPAs, to mitigate these issues and encourages CPAs to continue working with Indigenous groups directly to identify and resolve concerns.

CPAs in B.C. of all sizes could benefit from greater guidance from the federal government on how to meaningfully engage and align engagement that is conducted by each port. Some CPAs have already developed detailed engagement strategies that could be used to support the work of other CPAs, in addition to documents such as the B.C. Government's Draft Principles that Guide the Province of British Columbia's Relationship with Indigenous Peoples.

With guidance from the federal government, each CPA may want to consider developing an engagement strategy to better define the principles and guidelines for engaging their Indigenous communities. CPAs without a detailed strategy could design an official engagement document that outlines objectives for long and short-term planning and provides commitments as to how Indigenous communities will be engaged and consulted.

Some smaller CPAs have expressed challenges with capacity in-house for relationship building. Any changes to engagement activities should carefully consider engagement fatigue and capacity challenges among Indigenous groups. Opportunities should be identified to leverage existing activities, and should respect Indigenous groups' individual preferences on level and method of engagement.

Recommendation 4 – Provide CPAs with detailed principles and guidelines for meaningful engagement and partnership opportunities with Indigenous peoples

Documents developed by CPAs should be advanced in partnership with Indigenous groups, in the spirit of shared decision-making. By using an agreed upon framework for planning and decision making, local Indigenous communities' perspectives can be integrated, and a trust-based relationship can be developed.

Community Liaison Appointments

One step towards improved partnerships with Indigenous peoples would be to ensure a channel of communication between local Indigenous communities and each CPA's Board of Directors. Industry stakeholders have discussed appointing one Indigenous representative to each CPA Board of Directors. While the B.C. Government is supportive of actions to progress greater representation of Indigenous perspectives, there are concerns about appropriate representation of all groups if the representative is on behalf of a single Indigenous group. Capacity to appoint a representative and participate in decision-making also varies considerably among Indigenous groups near the four CPAs.

The B.C. Government suggests an alternative structure may work more effectively at integrating Indigenous perspectives. An option would be to have a community liaison to each CPA Board of Directors. The community liaison could communicate with the Board on behalf of a working group composed of the First Nations with traditional territory that overlaps each CPA. Formalizing the relationship between Indigenous communities and the CPA through mechanisms such as formal engagement agreements, an Indigenous advisory council, and/or a community liaison could serve to strengthen existing relationships and support the identification of new opportunities and partnerships.

Recommendation 5 – Encourage greater Indigenous representation on each Port Authority’s Board of Directors

The B.C. Government encourages the federal government to engage with Indigenous groups on the potential changes to the port governance structure, as well as carefully consider funding and other supports that may be necessary.

2.3 Sustainability and Port Communities

Environmental Assessment

CPAs are mandated to protect the environment on their federal port lands. Stakeholders have generally expressed that CPAs have been fulfilling this mandate, however have noted that smaller CPAs do not have environmental procedures developed in as much detail as larger CPAs and may struggle with resourcing. In addition, CPAs struggle with the perception of neutrality due to their overlapping duties for environmental management and project development.

The B.C. Government recognizes that CPAs have a dual role as both a proponent for the development of projects on port lands, as well as initiating environmental assessments as part of these projects where the project does not trigger a federal or provincial assessment (i.e., by the Canadian Environmental Assessment Agency [CEAA] or the B.C. Environmental Assessment Office [B.C. EAO]). The B.C. government recognizes the environmental assessment process conducted by B.C. CPAs is fundamentally sound. However, in cases where a CPA undertakes this dual role (where no federal or provincial environmental assessment is mandated), stakeholders as well as the B.C. Government have concerns about the risk of the perception of a conflict of interest.

In addition to the federal requirements, proposed projects on port lands may also trigger provincial environmental assessment requirements by the B.C. EAO. The EAO and port authorities maintain a strong relationship to ensure projects requiring both provincial and port authority review are conducted as efficiently as possible by undertaking a single process.

Correctly scoped and properly conducted environmental assessments of proposed projects within B.C. ports are a key aspect of a strong, sustainable economy. Stakeholders have indicated that lengthy review or hearing procedures that extend into several years can affect competitiveness and deter terminal operators from expanding. To support economic growth, the environmental assessment

process needs to consider potential project effects in the context and scale of how the project might create small or large environmental impacts.

Recommendation 6 – Introduce measures to increase transparency of the environmental assessment process where CPAs are the sole environmental authority

Examples of increased transparency measures that the federal government could mandate could include third-party reporting or review of the environmental assessment of a project. Increased transparency could also be achieved by providing more detailed guidelines for the environmental assessment to be conducted where a CPA is the proponent of a project that is on federal land (i.e., subject to environmental review by the CPA as the regulator), such as by providing more detail to the public on how a determination is made.

Emissions Reductions

The B.C. Government has set targets to reduce greenhouse gas (GHG) emissions in the province by 40% by 2030, 60% by 2040, and 80% by 2050 relative to 2007 levels. The Government of Canada also has emissions reductions targets. CPAs in B.C. have generally committed to working with the B.C. Government on emissions reductions and have made substantial progress in implementing clean technology.

All CPAs can achieve further environmental benefits and help the provincial and federal government meet emission reductions targets by promoting new clean technology and energy sources, more efficient methods of moving goods, and incentivizing terminal operators and shippers in emissions reductions. Programs like terminal electrification (i.e. shore power) can be promoted by CPAs with incentives on funding and implementation from the federal government. Programs like electrification also provide an opportunity to transition to newer technology within terminals. However, consideration and planning are needed to ensure terminals can maintain and create jobs within the local workforce that integrates with new technology.

Stakeholders have indicated that there are challenges within industry on strict emissions regulations for competitive reasons. The B.C. Government is committed to working with industry stakeholders and CPAs on programs to help achieve emissions reduction while remaining competitive.

Recommendation 7 – Mandate CPAs to publish an emissions reduction strategy

While some CPAs have published detailed emissions reduction strategies and targets, all CPAs should be mandated to publish plans for how they will reduce emissions. Ideally, emissions reductions targets would be in alignment with provincial and federal targets. CPAs could consider incentivizing and helping fund emission reductions by terminals, shippers, and road and rail users through proven technology (such as shore power) and pilot programs for innovative emissions reduction strategies.

2.4 Port Safety and Security

The B.C. Government is engaged in and supportive of ongoing measures to improve port safety and security. Safety and security for the ports are interdependent with other topics that the B.C. Government has provided recommendations on, such as environmental management and sustainability, local community integration and engagement, and Indigenous partnerships. Therefore, additional recommendations are not provided. The B.C. Government will continue to engage with Transport Canada on the Oceans Protection Plan initiatives, such as marine species at risk protection (e.g. Southern Resident Killer Whales), proactive vessel management, spill response, improving anchorages, baseline scientific research, and potential legislative changes.

2.5 Port Governance

Financial Flexibility

CPAs, the B.C. Government, and other key partners and stakeholders have identified the need for additional port and trade corridor infrastructure to support current operations and prepare for forecasted growth in cargo and container volumes. Improvements to financial flexibility for CPAs can have a substantial impact on the ports' ability to support economic growth. Under the *Canada Marine Act*, port authorities are required to be financially self-sufficient and act as commercial entities while competing for trade on an international scale. Port stakeholders have raised a range of cost/revenue concerns, including the increasing costs associated with administration, security and environmental protection. Port stakeholders have also raised concerns about CPA activities and spending, and the need for continued or increased oversight by Transport Canada. CPAs require financial flexibility to preserve existing infrastructure, and to support long term reliability and expansion of the trade corridor.

Recommendation 8 – Improve the financial flexibility of CPAs to support their competitiveness

Enabling and encouraging CPAs to diversify their revenue streams will improve their ability to carry out their mandate. Several actions can be taken to improve financial flexibility of the ports, which will ultimately improve the competitiveness of the CPAs:

Letters Patent:

- Amend borrowing limits to be determined by a metric that is tied to the market to enable CPAs to establish borrowing capacity with lending institutions.
- Eliminate the requirement to amend the Letter Patent before CPAs can purchase property.
- Streamline and improve the transparency for the process for amending the Letters Patent to help facilitate commercial business practices and allow CPAs to more quickly respond to opportunities.

Funding for Infrastructure Upgrades:

- Provide low-cost loans to rehabilitate port infrastructure of national or regional significance.
- Continue federal funding programs, such as the National Trade Corridors Fund, which allows CPAs to apply.
- Reduce or eliminate the annual stipend for CPAs that demonstrate a business case for infrastructure investment to capture specific market opportunities.

Lease Rates:

- Allow and encourage CPAs to diversify their revenue streams to maintain reasonable lease rates and user fees to attract investment and provide investment certainty.

Board Appointment Process

The *Canada Marine Act* provides the legislative authority for CPAs including governance. CPAs are each governed by an independent Board of Directors that are responsible for determining the port's strategic direction, investment plans, and overseeing the port's operation. Directors may serve up to a maximum of three consecutive terms each being up to three years, while boards strive to ensure that no more than half of the directors on each board expire in any one year. Port authorities have expressed challenges in the timeliness of the board appointment process. Some CPAs have experienced a situation where almost all their Board of Director terms have expired, resulting in directors in holdover or empty positions. A streamlined process is required to ensure CPAs can effectively operate by appointing candidates more efficiently. Ports and users have also expressed the importance of ensuring the directors have relevant knowledge and experience that can support the operation of the port and its activities.

Recommendation 9 – Streamline the CPA board appointment process to ensure continuity in Port Authority governance

It is recommended that the legislative framework be amended to ensure that board director appointments are completed in a set period following expiration of a board director's term, and that there are mechanisms in place to ensure that appointing bodies are held accountable to the appointment process and timelines.

3.0 Conclusion

The B.C. Government has provided several recommendations to Transport Canada, under the discussion streams provided for the Ports Modernization Review. While the current arm's length, financial self-sufficiency CPA model is working well in B.C., there are opportunities to ensure that CPAs are striking the correct balance between competitiveness and responsiveness to local communities. CPAs should also be continuing to ensure environmental sustainability, and providing opportunities for partnerships with Indigenous groups. B.C. anticipates strong ongoing collaboration with the federal government, CPAs, and other organizations to move these objectives forward.

Appendix A

Description of Stakeholders Engaged

This paper was produced by the B.C. Ministry of Transportation and Infrastructure in collaboration with the B.C. Environmental Assessment Office, the B.C. Intergovernmental Relations Secretariat, the B.C. Ministry of Environment and Climate Change Strategy, the B.C. Ministry of Indigenous Relations and Reconciliation, the B.C. Ministry of Jobs, Trade and Technology, the B.C. Ministry of Energy, Mines and Petroleum Resources, and the B.C. Ministry of Tourism, Arts and Culture.

The table below provides the list of government agency and industry stakeholders engaged.

Organization	Contact
Government	
Government of Alberta	Lawrence Schmidt, Director, Market Access and Intergovernmental Relations Joseph Aniston, Senior Policy Advisor
Government of Manitoba	Darren Gorman, Policy Consultant Gordon Tufts, Transportation Policy Consultant
Government of Saskatchewan	Brent Orb, Director, Railway Policy, Regulation and Programs Ed Knopf, Senior Rail Analyst
Nanaimo Port Authority	Ewan Moir, President & CEO
Office of the B.C. Container Trucking Commissioner	Michael Crawford, Commissioner
Port Alberni Port Authority	Zoran Znezevic, President & CEO
Prince Rupert Port Authority	Ken Veldman, Director, Public Affairs
Transport Canada	Guillaume Vincent, Policy Advisor
Vancouver Fraser Port Authority	Jim Crandles, Director, Project Management and Business Optimization Terry Lalari, Manager and Strategic Advisor, Government & Stakeholder Relations
Industry	
Association of Canada Port Authorities	Wendy Zatylny, President
B.C. Chamber of Shipping	Robert Lewis-Manning, President
B.C. Marine Terminal Operators Association	Bob Wilds, Executive Director
B.C. Trucking Association	Dave Earle, President & CEO
Cruise Line Industry Association	Greg Wirtz, CEO
Global Container Terminals	Marko Dekovic, Vice President, Public Affairs
Greater Vancouver Gateway Council	Mike Hendersen, Managing Director
International Longshore and Warehouse Union	Bob Dhaliwal, Secretary Treasurer
Railway Association of Canada	Michael Gullo, Director, Policy, Economic and Environmental Affairs