

December 2, 2018 (revised version of my letter submitted October 25, 2018)

Re. the Government of Canada 's Ports Modernization Review

I have personally served on, and provided advice to, many corporate and non-profit boards over the past 25 years. I have also developed Ethics courses and taught that subject on an adjunct basis to federal government officials, executives and MBA students at both UBC and SFU, as well as to board directors through the Institute of Corporate Directors "Corporate Directors College".

It appears to me that the Port of Vancouver and Vancouver Fraser Port Authority suffer from a structural conflict of interest, leading to an inherent bias in assessing both the demand for their own services and the impacts of expanding those services. Typically, while demand for the Port's services and associated economic benefits are exaggerated by ignoring better alternatives or externalizing impacts on local residents, the cumulative impacts on our natural environment and the loss of agricultural land are minimized or entirely missing from studies that, unbelievably, are conducted by the Port itself instead of being done by impartial third parties with no stake in the outcome.

How can those who are responsible for operating the Port *objectively* assess the impacts of their own operations? How can these assessments be trusted when individuals representing the Port have a systemic incentive to maximize the perception of benefits and to minimize the degree of real or potential harm? (For example, executive bonuses, promotions, longevity of employment or renewed contracts are all systemic incentives to be partisan by consciously or unconsciously skewing information for personal or corporate benefit.)

As a result, the Port Authority has now become a reckless promoter of business at any cost. It is no longer in service to the Canadian public. For example, with regard to shipping US thermal coal, the Port of Vancouver insisted they have the right to make unilateral decisions and ignore nine municipalities and eight MLAs who either outright rejected their proposal or demanded a full health impact assessment. Why should decisions by an unelected and partisan-appointed board of directors trump the consensus and clearly articulated requests of so many elected representatives? Is Canada no longer a democracy?

At times, Port Authority reports have omitted key information, or presented partial information within unreasonably narrow boundaries to justify the Port's desire to continuously expand regardless of actual demand. They dismiss, pretend to ignore, or under-report the externalized costs to society and the public purse, as well as the impacts on local communities and critically important ecosystems. They claim that irreparable and widespread ecological harms can be mitigated by piecemeal measures.

The Port has further abused its mandate at times by orchestrating a charade to make it appear that they have consulted the public and adequately assessed the health and environmental impacts of proposed expansion. Why has our government never acknowledged the Port's built-in prejudices towards never-ending expansion regardless of actual demand or *cumulative* impacts? Isn't it time to accept that the Port cannot simultaneously be a credible proponent, assessor and arbiter of its own activities?



Larry Colero

Delta, British Columbia