



**BC Marine Terminal
Operators Association**

October 26, 2018

Hon. Catherine McKenna
Minister of Environment and Climate Change
200 Sacre-Coeur
2nd Floor
Gatineau, Quebec
K1A 0H3

Dear Minister McKenna;

Re: "Regulations Designating Physical Activities"

The British Columbia Marine Terminal Operators Association represents the major import and export terminals on the Canadian West Coast. Our members employ in excess of 6000 employees within the province and have during the period 2008 to 2017 generated from both operations and capital investments \$11.7 billion in gross domestic product in British Columbia, provided \$9.7 billion in employment income and generated \$2.4 billion in tax revenue to all levels of government.

Terminal Operators are prepared to continue to invest in facilities, as required, to ensure that Canada maintains state of the art facilities capable of handling the projected growth in cargo volumes in a safe, efficient, reliable and environmentally responsible manner.

With the proven success in development and redevelopment of existing facilities, we see no valid reason for considering proposed changes to the Designated Project List. As we understand, the proposed changes would result in the inclusion of Vancouver Fraser Port Authority Project and Environmental Review Process Category C and D projects that generally have low to moderate impacts that can be avoided or mitigated through the existing legislative and regulatory processes.

We believe that the Port Authority's project and environmental review process is modern, robust, timely, comprehensive and transparent with timelines that have thus far proved to be sufficient for conducting thorough reviews. Proposed changes in Bill C-69 would likely increase timelines compared to the current system, add cost and uncertainty and lead to potential disincentive for additional investments that could negatively impact our ability to meet growth in import and export volumes.

Examples of projects that have been effectively and successfully dealt with under the current Port Authority review process include the following:

G3 Terminal Vancouver project



BHP Billiton Potash Export Facility Project

Fraser Grain Terminal Grain Export Facility Project

Alliance Grain Terminal Shiploader Project

Centerm Expansion Project

It is our belief that concerns raised with respect to the Port Authority's review and approval process have primarily arisen around those projects where the Port Authority has been both proponent and regulator. That being the case, addressing this issue is probably more suitable by updating the port mandate and governance through the current Port Modernization review initiated by Minister Garneau and excluding the proposed changes to the "Designated Project List" from Bill C-69

We believe that the public interest has been and will continue to be effectively served through the existing Port Authority that has resident expertise across a broad range of environmental and Aboriginal consultation specialties that have been beneficial in permitting terminal operator led projects.

We support the intentions of Bill C-69 to improve the public confidence into the regulatory process but do not support the proposed changes to the "Designated Project List" and believe that such changes could negatively impact the investment climate and our ongoing ability to meet the growing needs of Canadian Importers and Exporters in a timely manner.

Thank you for the opportunity to provide you with our concerns over this important matter and we are prepared to meet with you and or your staff to discuss these matters in greater detail should you require additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Wilds", is written over a blue horizontal line.

R. Wilds
Executive Director

cc: Hon. Marc Garneau, Minister of Transport
Hon. Jim Carr, Minister of International Trade
Hon. Lawrence MacAulay, Minister of Agriculture and Agri-Food
Hon. Amarjeet Sohi, Minister of Natural Resources