

METRO VANCOUVER CLOSING REMARKS FOR THE ROBERTS BANK TERMINAL 2 PROJECT

Metro Vancouver would like to thank the Roberts Bank Terminal 2 (RBT2) Review Panel for the opportunity to participate in the environmental assessment for the RBT2 Project, and to provide our closing remarks in this submission.

During the assessment review process, Metro Vancouver provided the Review Panel with a written submission ([CEAR 1616](#)) and oral presentation at the Public Hearing ([CEAR 1803](#)) outlining our concerns related to the assessment of potential environmental effects of the Project, and further responded to Undertakings for the Review Panel ([CEAR 1912](#) and [CEAR 1971](#)).

Metro Vancouver identified a number of issues of concern related to the assessment. Key among those were concerns that the assessment did not appropriately consider future air quality objectives and that the assessment may have overestimated the shift of marine vessels to cleaner Tier III engines, which could result in underestimates of NO_x emissions from marine vessels associated with the Project (the CEAR links above provide more details on these concerns). In Environment and Climate Change Canada's response to Undertaking #42 ([CEAR 1970](#)), they conclude that the Proponent's NO_x emission rates continue to be potentially underestimated, as "the rate of introduction of Tier III compliant vessels is overestimated by the Proponent and NO₂ predictions are underestimated as a result." The response further indicates that the largest ports in North America are forecasting a lower rate of introduction of Tier III compliant ships by 2035 than indicated in the assessment.

In general, the concerns identified suggest that there is uncertainty in the conclusions presented in the Environmental Impact Statement. As a result, there may be exceedances of applicable ambient air quality objectives and a potential for backsliding of regional emission reductions, which could trigger the need for new regional air quality management actions under the national Air Quality Management System.

Should the project proceed, Metro Vancouver continues to recommend implementation of a comprehensive air quality monitoring program for the Project, including a baseline assessment prior to commencement of the project. Proactive mitigation measures should be required, such as those outlined by Environment and Climate Change Canada ([CEAR 1795](#)), to prevent Project emissions from contributing to deteriorated air quality in the local and regional areas.