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Impact Assessment Agency of Canada
160 Elgin Street, 22nd Floor
Ottawa, ON K1A 0H3

BC Environmental Assessment Office
836 Yates St
Victoria, BC V8W 1L8

Dear Sirs/Mesdammes,

Re: Global Container Terminal's Withdrawal of Short Sea Shipping as Project Component from the Deltaport Berth 4 Expansion Project

GCT Global Container Terminals Inc. ("GCT") writes to provide an update to the BC Environmental Assessment Office (BCEAO) and the Impact Assessment Agency of Canada (IAAC) regarding the inclusion of a Short Sea Shipping (SSS) associated with the proposed Deltaport Expansion, Berth Four Project (DP4).

GCT believes that there is value in the expansion and enhancement of the SSS network in the Lower Mainland and, as a result, GCT had included the option for a SSS berth in our Initial Project Description and subsequent Detailed Project Description. GCT has continued to engage with Indigenous nations, local communities, regulators on the future of SSS. However, the issues raised through these engagements are beyond GCT's care and control and can only be addressed once a vision for SSS is created and implemented by the Vancouver Fraser Port Authority and Transport Canada, amongst others.

As SSS continues to be in the early stages of development and further studies are required to understand its feasibility, GCT would be challenged to conduct a robust and scientifically defensible assessment of SSS activities associated with DP4. At this time, it is difficult to accurately assess any of the valid concerns from Indigenous nations and regulators related to potential adverse effects or even the economic viability of SSS as shipping rules have yet to be clearly defined or established. As such, we request that SSS be removed from the DP4 project description and scope of the assessment

Removing the SSS berth from the scope of the Project is not GCT's preference as we continue to be of the opinion that there are benefits to the expansion of a SSS network, however, those benefits are also not quantifiable at this time and additional studies are required beyond the scope of the DP4 assessment.

We appreciate your consideration of this matter. Please contact me if you have any questions.

Sincerely,

<Original signed by>

Mike McLellan
Vice President, Project Development
GCT Global Container Terminals Inc.

cc: Marko Dekovic, GCT Vice President, Public Affairs