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Conflicts of interest, biases and possible ulterior motives undermine the *Roberts Bank*Terminal 2 assessment process

Primary Concerns with Approval

- 1. Key proponent reports reflect inherent **biases** and **conflicts of interest**
- 2. Indications of ulterior motives, i.e., unspecified **alternative uses** impacts would be assessed piecemeal *after* RBT2 is built
- 3. High possibility of irreversible environmental disaster
- 4. Exclusion of a wide range of possible cumulative effects

Conflicts of Interest and Bias

- VFPA (d.b.a. PMV) is inherently conflicted in its dual role as both the evaluator and beneficiary of the project
 - VFPA has a "commitment bias" as project proponents and promoters
 - Priority is increased business (vs. protection of nature or public health)
- VFPA contractors provided or packaged information in reports. No impartial reporting by arms-length experts independent of VFPA.
- Limited scope and piecemeal scope changes
 - Disconnected reports on inter-connected potential impacts
 - Climate Change and Invasive Aquatic Species omitted

Plausible Alternative Purposes

- Overly-optimistic estimates of demand for container capacity suggest a hidden agenda to re-purpose after construction
- Possible future shipping of:
 - Dilbit from the TransMountain Pipeline, or LNG
 - Coal from the United States
 - US coal exporters are losing battles to ship coal from Pacific Northwest
 - N. America's largest coal port could be adapted to ship twice as much
 - Significant potential increase to local health hazard and healthcare costs

Likelihood of Irreversible Disaster

- Even if occurrence is deemed unlikely, the potential severity of any impact from an environmental incident is high
- Potential severity of incidents higher if RBT2 is later repurposed to ship something other than containers
- Unknown impacts are real, even if impossible to identify or assess. Yet little commitment to the "precautionary principle" required by Canadian Environmental Assessment Act

Cursory Consideration of Cumulative Impacts

- Consideration of worst-case scenarios inadequate, (perhaps due to "optimism bias" or "commitment bias")
- No scenarios to assess combined impact with other projects planned for this region
- Linear analysis to assess the impact of a "50-year storm event" appears to neglect compounding/accelerating effects of Climate Change

Colero's Conclusion

Due to inherent biases and conflicts of interest that very likely influenced the current assessment process, the only responsible actions at this point are to either:

- (a) Abandon the project concept entirely; or,
- (b) Start a new, impartial and more complete assessment of the current situation based on arms-length third-party expertise and analysis