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March 30, 2022

Samantha Sabo Acting Panel Manager, Review Panels Division Impact Assessment Agency of Canada 160 Elgin Street, 22nd Floor Ottawa, Ontario K1A 0H3

Transmitted via Email: <email address removed>

Re: Deltaport Expansion, Berth Four Project (Reference Number 81010)
Temporary Time Limit Suspension Request with Reasons

Dear Ms. Sabo:

Further to discussions and information provided by the Impact Assessment Agency of Canada (the Agency) to GCT Canada Limited Partnership (GCT), as the proponent for the Deltaport Expansion, Berth Four Project (DP4), we are writing to request that the Agency suspend the timeline for the Planning Phase under the Impact Assessment Act.

We understand that the suspension will allow the Agency and the BC Environmental Assessment Office (the EAO) to address the challenges of the coordinated federal and provincial assessment process and the legislated federal timelines. We hope the suspension will also allow additional opportunities for meaningful engagement and consensus seeking with Indigenous Nations. Based on collaboration with the Agency and the EAO, GCT requests that the timeline for the federal process be extended by 45 days such that it resumes on May 31, 2022. At such time, we expect the Agency and the EAO will have had sufficient time to finalize and issue the final Joint Guidelines, Process Order, Joint Assessment Plan, Joint Indigenous Engagement and Partnership Plan, and the Joint Permitting/Regulatory Coordination Plan.

The 45-day extension is additional to the 90-day extension previously requested by GCT to support collaboration and coordination between the Agency and the EAO.

GCT acknowledges the efforts made by the Agency and the EAO in addressing the challenges inherent in navigating the new federal and provincial assessment processes. GCT further acknowledges the importance of aligning and coordinating the federal and provincial assessment processes to achieve an efficient "one project, one assessment" approach, including coordinated timelines for the benefit of both potentially affected Indigenous Nations and GCT.

GCT is committed to building long-term relations with Indigenous Nations that allow for meaningful and collaborative engagement on important project-related considerations. GCT will utilize the additional 45-day period to continue to advance its ongoing engagements with Indigenous Nations and regulatory authorities, including the majority of the Nations that have already responded to the draft Joint Guidelines, Agency/EAO plans, and GCT's field study work plans. GCT would appreciate having further conversations with the Agency and the EAO to understand how all parties can work efficiently together to obtain information that will build upon the existing and available information from assessments of other projects in the area. Doing so will address the concerns raised by many Indigenous Nations of the need to avoid duplication of their efforts and straining of their resources as they engage on multiple projects.

GCT is also dedicated to advancing the review of DP4 in a timely and efficient manner and appreciates the commitment of the Agency and EAO to coordinate their assessment processes. Please contact me if you have any questions regarding this request.

Sincerely,

(Original signed by)

Mike McLellan
Vice President, Project Development
GCT Global Container Terminals

cc: Terence Hubbard, IAAC Kim Walters, EAO Marko Dekovic, GCT