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Re: SkeenaWild's Comments on Vopak Pacific Canada Project Description and the Draft Application Information Requirements

Please accept SkeenaWild's submission to the British Columbia Environmental Assessment Office regarding the draft Application Information Requirements (AIR) for the proposed Vopak Pacific Canada (the project).

We are interested in safeguarding the environmental, social, cultural, health and economic values of northwestern British Columbia from the impacts of the proposed project.

SkeenaWild believes that this project needs to be assessed in broader terms than what is described in the draft AIR. The project components that are included in the scope of the draft AIR are only the physical components that will be owned and operated by Vopak Development Canada Inc (Vopak), with the addition of a narrow shipping lane to and from the marine.

Expand the Scope

This project is a new development for northern BC because it the start of the bulk movement and storage of petroleum liquids. Therefore, the project assessment needs to include the activities that are directly associated with Vopak's proposed physical facilities. A full assessment on both valued ecosystem components and human health and safety needs to be completed and should include the following:

- Potential impacts on salmon in the Skeena and Fraser Watersheds from the movement and storage of bulk liquid petroleum in large volumes by rail cars using the CN rail line,
- Risks to public safety and emergency preparedness in the communities of northwestern BC from the movement and storage of bulk liquid petroleum in large volumes by rail using the CN rail line,
- Impacts from the introduction, operation and anchoring of tankers carrying bulk liquid petroleum through the coastal waters, and in and around the Prince Rupert Harbour.
- The anchoring of loaded ships in the Prince Rupert Harbor.
- The dredging of the ocean floor and the potential to disturb toxins deposited by past industrial activity (ex. pulp mill).

If the BCEAO sees complications in getting Vopak, CN and tanker operators to develop and coordinate one environmental application, then the BCEAO should initiate a regional



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strategic environmental assessment to address the aforementioned broader issues beyond those in Vopak's draft AIR.

Alternatives Need to Be Considered

There is no mention of the development of alternatives to the project, including the option of no project at all.

Highest Level of Public Involvement

Since this is the introduction of the bulk movement and storage of liquid petroleum in large volumes, which pose significant risk to human safety and the environment, SkeenaWild is requesting that this environmental assessment receive the highest level of public involvement and that the federal and provincial review processes be harmonized into a joint review panel. In addition, we are requesting that the Canadian Environmental Assessment Agency assume responsibility of the federal environmental review instead of the Prince Rupert Port Authority—whose primary mandate is to promote expansion of the port, not assess environmental impacts. Finally, participant funding should be provided for groups to undertake independent risk assessment of the project and participate in the review using the best available science.

The Risks of Diesel Needs to be Fully Understood and Assessed

The impacts and risks of diesel leaks and spills into the ground water systems of the Skeena, and Fraser River watersheds, and the Skeena estuary and North Coast waters need to be fully understood and assessed. We need to fully understand the risks to public safety from 240 rail cars of flammable toxins travelling through the center of our communities each day. We also need to assess the short and long term implications from the project on human health and valued ecosystems components (i.e. salmon, shell fish, marine mammals).

Air Emissions and Impacts on Air Quality Need to Be Fully Understood and Assessed

There is evidence that the transport of refined liquid petroleum products by train result in the release of emissions. As well, the release of emissions in around the storage tanks and marine facility need to be fully understood and assessed. A comprehensive modeling of impacts on air quality needs to be undertaken.

Thank you for the opportunity to comment. We look forward to an enhanced environmental assessment process.

Sincerely,

Greg Knox
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