

September 25, 2013

James Crandles  
Director, Planning and Development  
Port Metro Vancouver  
100 The Pointe, 999 Canada Place  
Vancouver, BC V6C 3T4

Dear Mr. Crandles:

**Re: Application to Port Metro Vancouver by Fraser Surrey Docks for Proposed Direct Transfer Coal Facility at 11060 Elevator Road, Surrey, V3V 2R7**

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Thank you for your letter of September 13, 2013 updating us on the review process for this project. We appreciate the new Port Metro Vancouver requirements of Fraser Surrey Docks for the project, as outlined in the letter, which address some of the concerns that Medical Health Officers in Fraser Health and Vancouver Coastal Health have previously raised.

Of particular interest to us is the requirement that Fraser Surrey Docks complete an Environmental Impact Assessment (EIA) for the project, including a section on the effects of the project on human health. While this will not be an independent Health Impact Assessment, if conducted appropriately, it can provide the opportunity to assess potential risks to human health in a meaningful way.

At our previous meeting with you and your staff, we requested the opportunity to meet with the consultants conducting the EIA in order to provide input into the parameters of the EIA and assessment of human health risk. On September 12, 2013, a number of Fraser Health and Vancouver Coastal Health Medical Health Officers and senior Environmental Health staff met with a number of consultants regarding the EIA.

Following that meeting, we have a number of concerns we would like to bring to your attention. Firstly, it is our understanding that SNC Lavalin has been contracted to pull together the EIA by the end of September 2013, and that this will be based on analyses already completed by other consultants rather than any new work. Dr. Leonard Ritter and other consultants attending our meeting indicated that they had already completed their analyses of potential environmental and health effects, and expressed surprise that these documents had not been shared with us in advance of the meeting. No information nor any analyses were brought to the meeting, nor was our input sought into further analyses. We were left with the impression that the report will be completed by SNC Lavalin, simply summarizing other work already done, and that we would have no further opportunity for input.

As we discussed at our last meeting with Port Metro Vancouver, we have two requests:

1. We request input into the parameters of the EIA and assessment of potential health impacts as part of the review process. This is the only way we can ensure that the concerns we have raised are being

appropriately considered in a methodologically sound manner. In order to do this, we recommend that all current and completed analyses of human health effects is shared with us, and another meeting is scheduled with the consultants to review the parameters of the assessment and determine if changes or additions are warranted.

2. We request the opportunity to review the assessment when complete to determine whether or not it adequately considers and evaluates potential human health risks. We suggest the Port Metro Vancouver ask Fraser Surrey Docks to undertake this step before considering that they have met this condition of the project review.

While we don't yet know the outcome of the assessment, it is important that our input is meaningful and unfettered. Otherwise it will be difficult for us, and likely the public, to have confidence in this process and its outcomes.

We thank you for your consideration and look forward to your early response.

Sincerely,



Paul Van Buynder MBBS MPH FAFPHM  
Chief Medical Health Officer and  
Vice-President, Population Health  
Fraser Health Authority



Patricia Daly MD, FRCPC  
Chief Medical Health Officer and  
Vice-President, Public Health  
Vancouver Coastal Health

Cc: Jeff Scott, President and CEO Fraser Surrey Docks  
Perry Kendall, Provincial Health Officer  
Roger Quan, Division Manager, Air Quality Policy and Management, Metro Vancouver