

Backgrounder

Proposed West Coast Oil Pipeline Project

(BC Nature – Background Information for Letters of Support)

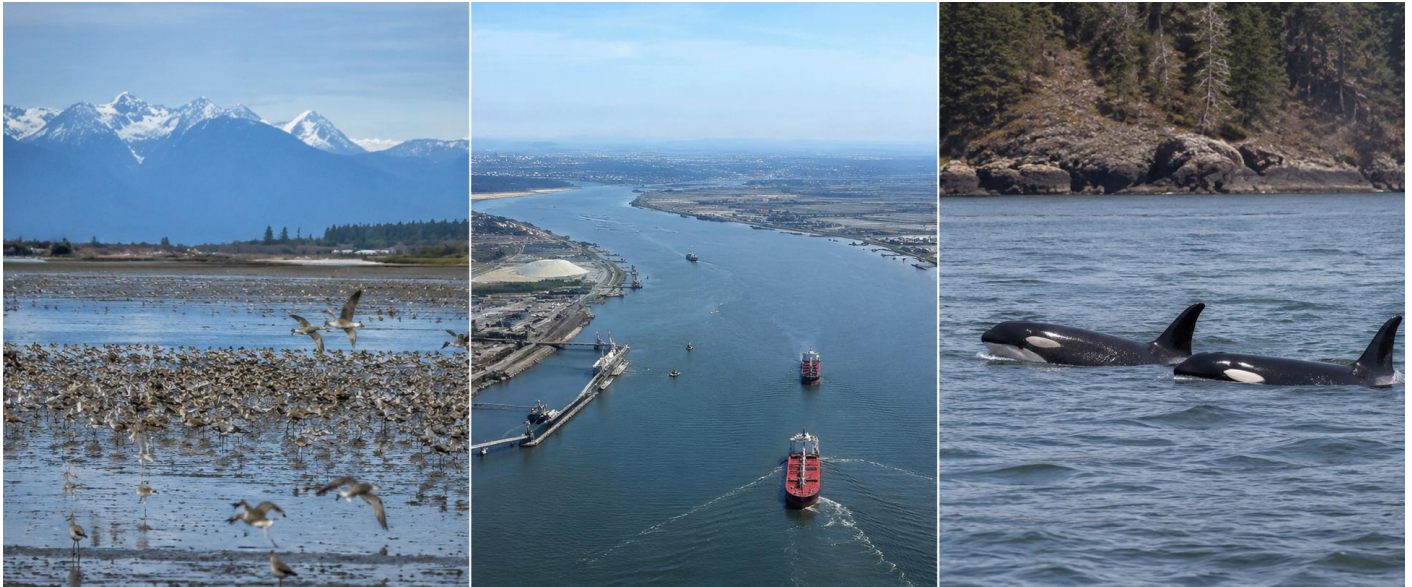


Photo Credit: Canva

Issue Summary

The Government of Alberta has submitted a proposal for the West Coast Oil Pipeline Project, a 1,200 km pipeline capable of transporting one million barrels of crude oil per day from Bruderheim, Alberta, to a new marine terminal at Roberts Bank in Delta, British Columbia. The proposal includes:

- Fifteen crude oil storage tanks at Roberts Bank
- Approximately 6.5 million barrels of storage
- Two Very Large Crude Carrier (VLCC) berths capable of handling vessels carrying approximately two million barrels each
- A new marine terminal within the Fraser River Estuary
- Expanded tanker traffic throughout the Salish Sea, including Georgia Strait, Haro Strait, Boundary Pass and Juan de Fuca Strait, with potential environmental impacts extending far beyond Roberts Bank and the Fraser Estuary

The proposal would substantially expand industrial development within one of Canada's most important coastal ecosystems while increasing heavy tanker traffic throughout the Salish Sea. Together, these changes have the potential to affect internationally significant migratory bird habitat, salmon populations, marine mammals, including whales and the broader ecological integrity of the Fraser Estuary and surrounding marine waters.



Species at Risk Context

Status

Roberts Bank, the Fraser River Estuary and the surrounding Salish Sea support numerous federally listed Species at Risk and other ecologically important wildlife. While the proposed marine terminal would directly affect the Fraser Estuary, the associated increase in tanker traffic would extend potential impacts throughout the Salish Sea, including Boundary Pass, Georgia Strait, Haro Strait and Juan de Fuca Strait. Species potentially affected include migratory birds, salmon, marine mammals and other wildlife that depend on these interconnected marine and estuarine ecosystems.

Species

Potentially affected species include:

- Western Sandpiper
- Red Knot
- Dunlin
- Marbled Godwit
- Great Blue Heron (Pacific subspecies)
- Barn Owl
- Short-eared Owl
- Southern Resident Killer Whales
- Bigg's Killer Whales
- Humpback whales
- Gray whales
- Harbour porpoises
- Dall's porpoises
- Pacific white-sided dolphins
- Harbour seals
- Steller sea lions
- California sea lions
- Chinook Salmon
- Eulachon
- White Sturgeon

Habitat

Critical habitats potentially affected by the project include:

- Intertidal mudflats
- Salt marshes
- Eelgrass beds

- Estuarine channels
- Nearshore marine waters
- Open marine waters of the Salish Sea
- Marine mammal foraging, migration and resting areas
- Chinook salmon migration corridors
- Agricultural fields used by wintering waterfowl

Primary Threats

Primary threats associated with the proposed project include:

- Habitat loss and degradation
- Habitat fragmentation
- Increased tanker and vessel traffic throughout the Salish Sea
- Underwater noise affecting marine mammals and fish
- Vessel strikes involving whales and other marine mammals
- Increased risk of crude oil spills and chronic operational pollution
- Shoreline industrialization and marine terminal expansion
- Disturbance to migratory birds and other wildlife
- Disruption of salmon migration and marine food webs
- Cumulative effects in combination with existing and proposed industrial development and shipping activity throughout the Salish Sea

Significance of Area

The Fraser River Estuary and adjacent Salish Sea comprise one of Canada's most ecologically significant coastal ecosystems. The estuary supports millions of migratory birds annually and is one of the most important stopover sites on the Pacific Flyway, while the surrounding marine waters provide important habitat and migration corridors for salmon, whales, porpoises, seals and other marine wildlife. Together, these interconnected ecosystems support exceptional biodiversity and ecological productivity at both regional and international scales.

Geographic Context

Location

- Roberts Bank
- Municipality of Delta, British Columbia
- Fraser River Estuary
- Southern Salish Sea

Marine Shipping Corridor



The proposed tanker route extends from Roberts Bank through:

- Boundary Pass
- Haro Strait
- Georgia Strait
- Juan de Fuca Strait
- Pacific Ocean

Ecosystem

- Fraser River Estuary
- Fraser Delta
- Salish Sea
- Pacific coastal marine ecosystem

Habitat

- Intertidal mudflats
- Salt marshes
- Eelgrass beds
- Tidal channels
- Estuarine waters
- Nearshore and open marine waters
- Agricultural fields used by migratory birds and wintering waterfowl

Protection Gap

Although portions of the Fraser River Estuary are protected through Wildlife Management Areas, Important Bird Areas, Ramsar designation, and adjacent protected lands, industrial development continues to expand within the estuary. Most ecological processes, including bird migration, salmon migration and marine mammal movement, occur outside formally protected areas.

While existing marine protected areas and species-specific conservation measures provide some protection within the Salish Sea, they are too small and scattered to reduce the environmental risks associated with increased tanker traffic. The proposed project would increase industrial activity across interconnected estuarine and marine ecosystems where important wildlife habitats and migration corridors remain vulnerable to cumulative effects, underwater noise, vessel strikes and spill risk.

Regulatory Gap

The Alberta proposal provides almost no discussion of the environmental effects of increased tanker traffic through Georgia Strait, Haro Strait and Juan de Fuca Strait. Marine mammals are mentioned just three times in 89 pages, with mitigation measures focused primarily on Southern Resident Killer Whales through existing federal marine mammal protection programs. The proposal contains little discussion of potential



impacts on recovering humpback whale populations or other marine mammals that regularly use the Salish Sea.

Ecological Context

The Fraser River Estuary is one of the largest and most productive estuarine ecosystems on the Pacific Coast of North America. Together with the adjacent Salish Sea, it forms an interconnected ecological system that supports exceptional biodiversity and provides critical habitat for migratory birds, salmon, marine mammals and numerous Species at Risk.

The ecosystem provides:

- Nursery habitat for salmon and other fish species
- Internationally significant shorebird habitat along the Pacific Flyway
- Wintering habitat for waterfowl
- Critical habitat and migration corridors for marine mammals
- Carbon storage in salt marshes and eelgrass beds
- Flood attenuation and shoreline stabilization
- Nutrient cycling and estuarine productivity
- Fish migration corridors linking freshwater and marine ecosystems

The ecological productivity of the Fraser River Estuary supports marine and terrestrial food webs throughout the Salish Sea. Its interconnected habitats are ecologically linked, meaning that changes in one part of the system, including increased industrial development or marine shipping activity, will have consequences that extend well beyond Roberts Bank.

Marine Shipping Corridor

The proposed terminal would substantially increase the number of large crude oil tankers travelling through the Salish Sea. While the proposal focuses primarily on Roberts Bank and the Fraser Estuary, the environmental effects of tanker traffic would extend far beyond the terminal itself, affecting marine ecosystems throughout southern Georgia Strait, Haro Strait and Juan de Fuca Strait.

Potential impacts include:

- increased underwater noise
- increased risk of vessel strikes on whales
- disruption of whale foraging and communication
- elevated spill risk across the Salish Sea
- cumulative effects alongside existing shipping associated with Trans Mountain Expansion, Port of Vancouver growth and other commercial traffic

Conservation Significance



BC Nature has long recognized Roberts Bank, the Fraser River Estuary and the adjacent Salish Sea as among British Columbia's highest conservation priorities. These interconnected ecosystems support internationally significant migratory bird populations, critical salmon habitat, marine mammals and numerous Species at Risk, while providing ecological services that extend throughout the Pacific coast.

Key conservation concerns associated with the proposed project include:

- Continued industrialization of one of Canada's most important estuarine ecosystems
- Loss and fragmentation of estuarine and nearshore habitats
- Increased tanker traffic throughout the Salish Sea
- Increased risk of oil spills and chronic marine pollution
- Underwater noise and vessel strike risks affecting whales and other marine mammals
- Impacts on migratory birds and internationally significant Pacific Flyway habitat
- Impacts on salmon populations and marine food webs
- Cumulative effects alongside existing and proposed port expansions, the Trans Mountain Expansion Project and increasing marine shipping activity

Scientific Context:

The proposal is currently at an early planning stage. While it references environmental stewardship and future regulatory review, relatively little information is provided regarding:

- Pacific Flyway values
- cumulative ecological effects
- impacts on migratory birds
- estuarine ecological function
- mudflat ecosystem services
- long-term monitoring
- avoidance of sensitive habitats
- impacts of tanker traffic throughout the Salish Sea
- underwater acoustic disturbance
- vessel strike risk for marine mammals
- impacts on humpback whales and other recovering whale populations
- cumulative marine shipping effects beyond Roberts Bank

These issues would require detailed independent assessment through any future environmental review process

References

Government of Alberta project documents

- Government of Alberta. *West Coast Oil Pipeline Project: Submission to the Major Projects Office for Listing Under the Building Canada Act*. 2026.
<https://open.alberta.ca/dataset/a529e3da-6368-43d7-af43-74b1773be517/resource/6e43e4b4-3dfe-4c28-b723-116b6cab19ea/download/west-coast-oil-pipeline-project-submission-to-mpo.pdf>
- Government of Alberta. *West Coast Oil Pipeline Project: Plain-Language Summary*. 2026.
<https://open.alberta.ca/dataset/a529e3da-6368-43d7-af43-74b1773be517/resource/c6269884-58fd-40fa-bb52-01d0c0360bc2/download/west-coast-oil-pipeline-project-submission-to-mpo-plain-language-summary.pdf>
- Government of Alberta. *West Coast Oil Pipeline Project—Open Government Publication Record*.
<https://open.alberta.ca/publications/west-coast-oil-pipeline-project>
- Government of Alberta. *West Coast Oil Pipeline*.
<https://www.alberta.ca/west-coast-oil-pipeline>
- Government of Alberta. *West Coast Oil Pipeline—Working Together to Protect Land and Water*.
<https://www.alberta.ca/system/files/em-west-coast-oil-pipeline-working-together-to-protect-land-and-water.pdf>
- Government of Alberta. *West Coast Oil Pipeline—Alberta Major Projects*.
<https://majorprojects.alberta.ca/details/West-Coast-Oil-Pipeline/12181>

BC Nature references

- BC Nature. *Advocacy for Nature*.
https://bcnature.org/advocacy_for_nature/
- BC Nature. *Roberts Bank Terminal 2*. Letter to the Prime Minister and federal ministers, February 7, 2023.
<https://bcnature.org/wp-content/uploads/2023/02/2023-02-07-Roberts-Bank-Terminal-2-Correspondence.pdf>
- BC Nature and supporting scientists. *Letter from Scientists Regarding Roberts Bank Terminal 2*. February 7, 2022.
<https://bcnature.org/wp-content/uploads/2022/02/RBT2-Letter-from-Scientists.pdf>
- BC Nature. *Fraser River Estuary Act*. April 2021.
<https://bcnature.org/wp-content/uploads/2021/04/Fraser-River-Estuary-Act-2021.pdf>
- BC Nature. *Roberts Bank Terminal 2 Project*. Correspondence to the federal Minister of Environment and Climate Change, January 2021.
<https://bcnature.org/wp-content/uploads/2021/01/RBT2-J-Wilkinson-Correspondence-Jan-21.pdf>
- BC Nature. *Submission to the Canadian Environmental Assessment Agency on the Roberts Bank Terminal 2 Project*. December 6, 2013.
<https://bcnature.org/wp-content/uploads/2020/09/ON-ROBERTS-BANK-TERMINAL-2-PROJECT.pdf>
- BC Nature. *Roberts Bank Terminal 2 Project—Need for a Federal Environmental Assessment*. October 5, 2013.
<https://bcnature.org/wp-content/uploads/2020/09/Roberts-Bank-Env.-Assessment.pdf>
- BC Nature. *Transfer of Water Lots on Roberts Bank*. Correspondence to the British Columbia Minister of Transportation and Infrastructure, December 8, 2017.

- <https://bcnature.org/wp-content/uploads/2020/09/Transfer-of-Water-Lots-on-Roberts-Bank-Correspondence-1.pdf>
- BC Nature. *Roberts Bank Wildlife Management Area Designation*. May 22, 2007.
<https://bcnature.org/wp-content/uploads/2020/10/4-Correspondence-22-5-2007-Roberts-Bank-WMA-004.pdf>
 - BC Nature. *A Proposal for Protecting the Fraser River Estuary*. 2005.
<https://bcnature.org/wp-content/uploads/2020/10/28-Proposal-11-2-2005-Fraser-River-Estuary-028.pdf>
 - Federation of British Columbia Naturalists. *Response to the Report for the Deltaport Third Berth Project*. 2006.
<https://bcnature.org/wp-content/uploads/2020/10/1-FBCN-Response-to-Report-for-DeltaPort-Third-Berth-30-8-06-001.pdf>
 - BC Nature. *Third Berth at Roberts Bank—Canadian Environmental Assessment Correspondence*. 2005.
<https://bcnature.org/wp-content/uploads/2020/10/13-Third-Berth-Undergoing-CEA-Act-Study-Correspondence-013.pdf>
 - Federation of British Columbia Naturalists/Fraser River Coalition. *Comments on the Fraser River Estuary Study*. 1983.
<https://bcnature.org/wp-content/uploads/2020/10/43-Fraser-River-Coalition-12-1983-comments-043.pdf>
 - BC Nature. *Fraser River Lowlands—Natural Areas*.
<https://bcnature.org/wp-content/uploads/2020/10/2-Leaflet-undated-Fraser-River-Lowlands-002.pdf>
 - BC Nature. *Comments Regarding Crown Lands at Roberts Bank and Boundary Bay*. 1999.
<https://bcnature.org/wp-content/uploads/2020/10/7-Correspondence-31-8-1999-Crown-Lands-007.pdf>
 - BC Nature. *Comments Regarding Sand and Gravel Removal in the Lower Fraser River*. 1998.
<https://bcnature.org/wp-content/uploads/2020/10/8-Fraser-Gravel-1-4-1998-correspondence-008.pdf>
 - BC Nature. *BCnature Magazine—Fall 2020*. Includes material on Roberts Bank, migratory birds and the Fraser Estuary.
<https://bcnature.org/wp-content/uploads/2020/09/Fall-2020-BCnature-magazine.pdf>
 - BC Nature. *BCnature Magazine—Summer 2022*. Includes Fraser Estuary habitat loss and Roberts Bank conservation concerns.
<https://bcnature.org/wp-content/uploads/2022/05/Summer-2022-Final-web.pdf>
 - BC Nature. *BCnature Magazine—Winter 2015*. Includes BC Nature material concerning Roberts Bank Terminal 2.
<https://bcnature.org/wp-content/uploads/2020/09/BCNature-Winter2015.pdf>
 - BC Nature. *Appendix 8: Archival Records*. Includes a record of BC Nature’s historical Fraser Estuary and Roberts Bank advocacy.
<https://bcnature.org/wp-content/uploads/2024/10/Appendix-8.-Archival-Records.pdf>
 - BC Nature. *Appendix 10: Roundtables, Conferences and Workshops*. Includes BC Nature’s historical work on sanctuaries and conservation planning in the Fraser River Estuary.
<https://bcnature.org/wp-content/uploads/2024/10/Appendix-10.-Roundtables-Conferences-and-Workshops.pdf>

Birds Canada and migratory-bird references

- Birds Canada. *The Fraser River Estuary*.
<https://www.birdscanada.org/conserv-birds/fraser-river-estuary>
- Birds Canada. *2021 Report: Fraser River Estuary Important Bird and Biodiversity Area eBird Survey*.
https://birdscanada.org/wp-content/uploads/2022/01/Fraser_IBA-bird-count-Report-2021_EN.pdf
- Birds Canada. *Choosing a Sustainable Future for the Fraser River Estuary*.
<https://www.birdscanada.org/choosing-a-sustainable-future-for-the-fraser-river-estuary>
- Birds Canada. *Speak Up Now—Protect the Fraser Estuary for Birds We Love*.
<https://www.birdscanada.org/speak-up-now-protect-the-fraser-estuary-for-birds-we-love>
- Birds Canada. *A Successful Third Count in the Fraser River Estuary, a Crucial Wintering Bird Hotspot*.
<https://www.birdscanada.org/a-successful-third-count-in-the-fraser-river-estuary-a-crucial-wintering-bird-hotspot>
- Birds Canada. *New Paper Underlines Importance of B.C.'s Fraser Delta to Birds*.
<https://www.birdscanada.org/new-paper-underlines-importance-of-bcs-fraser-delta-to-birds>
- Birds Canada. *Bird Flocks in B.C.'s Fraser River Estuary Inspire Awe*.
<https://www.birdscanada.org/bird-flocks-in-bcs-fraser-river-estuary-inspire-awe>
- Birds Canada. *Tracking Dunlin in the Fraser Estuary*.
<https://www.birdscanada.org/tracking-dunlin-in-the-fraser-estuary>
- Birds Canada. *Western Sandpiper—Showy Shore Socialite*.
<https://www.birdscanada.org/westernsandpiper>
- Birds Canada. *Fraser Estuary Resources and Articles*.
<https://www.birdscanada.org/tag/fraser-estuary>
- Birds Canada. *Recommendations in Roberts Bank Terminal 2 Report Will Not Sufficiently Protect Canada's Birds*.
<https://www.birdscanada.org/recommendations-in-roberts-bank-terminal-2-report-will-not-sufficiently-protect-canadas-birds>

Federal bird and Species at Risk references

- Environment and Climate Change Canada. *Bird Conservation Strategy for Bird Conservation Region 5: Northern Pacific Rainforest*.
<https://www.canada.ca/en/environment-climate-change/services/migratory-bird-conservation/publications/strategy-region-5-pacific-rainforest.html>
- Environment and Climate Change Canada. *Red Knot: COSEWIC Assessment and Status Report*. 2020.
<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/cosewic-assessments-status-reports/red-knot-2020.html>
- Environment and Climate Change Canada. *COSEWIC Assessments and Status Reports*.
<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/cosewic-assessments-status-reports.html>

- Committee on the Status of Endangered Wildlife in Canada. *COSEWIC Status Reports*.
<https://cosewic.ca/index.php/en/status-reports.html>

Killer whale references

- Fisheries and Oceans Canada. *Recovery Strategy for the Northern and Southern Resident Killer Whales (Orcinus orca) in Canada*. 2018.
<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/recovery-strategies/killer-whales.html>
- Fisheries and Oceans Canada. *Recovery Strategy for the Northern and Southern Resident Killer Whales—Full PDF*.
https://wildlife-species.canada.ca/species-risk-registry/virtual_sara/files/plans/Rs-ResidentKillerWhale-v00-2018dec-Eng.pdf
- Environment and Climate Change Canada and Fisheries and Oceans Canada. *Southern Resident Killer Whale Imminent Threat Assessment*. 2018.
https://wildlife-species.canada.ca/species-risk-registry/virtual_sara/files/Ri-Ita-SthnResidentKillerWhale-v00-2018Jul-Eng.pdf
- Environment and Climate Change Canada and Fisheries and Oceans Canada. *Summary of the Imminent Threat Assessment for the Southern Resident Killer Whale*. 2018.
https://wildlife-species.canada.ca/species-risk-registry/virtual_sara/files/Ri-Ita-SthnResidentKillerWhale-v00-2018May-Eng.pdf
- Environment and Climate Change Canada. *Southern Resident Killer Whale Imminent Threat Assessment*. 2024.
<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/imminent-threat-assessments/southern-resident-killer-whale-2024.html>
- Fisheries and Oceans Canada. *Action Plan for the Northern and Southern Resident Killer Whale (Orcinus orca) in Canada*.
<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/action-plans/southern-resident-killer-whale.html>
- Fisheries and Oceans Canada. *Report on the Progress of Recovery Strategy Implementation for Northern and Southern Resident Killer Whales in Canada, 2015–2019*.
https://wildlife-species.canada.ca/species-risk-registry/virtual_sara/files/5yr-ResidentKillerWhale-v00-2022jan-Eng.pdf
- Fisheries and Oceans Canada. *Northern and Southern Resident Killer Whales—Recovery Documents and Progress Information*.
<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/recovery-strategies/northern-southern-killer-whales-2018.html>

Humpback whale and other marine-mammal references

- Environment and Climate Change Canada. *COSEWIC Assessment and Status Report on the Humpback Whale (Megaptera novaeangliae kuzira) in Canada*. 2022.

- <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/cosewic-assessments-status-reports/humpback-whale-2022.html>
- Fisheries and Oceans Canada. *Management Plan for the North Pacific Humpback Whale (Megaptera novaeangliae) in Canada*.
<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/management-plans/north-pacific-humpback-whale.html>
- Fisheries and Oceans Canada. *Marine Mammal Regulations*.
<https://laws-lois.justice.gc.ca/eng/regulations/SOR-93-56/>
- Fisheries and Oceans Canada. *Watching Marine Wildlife*.
<https://www.dfo-mpo.gc.ca/species-especes/mammals-mammiferes/watching-observation/index-eng.html>

Roberts Bank environmental-assessment references

- Impact Assessment Agency of Canada. *Roberts Bank Terminal 2 Project—Review Panel Report*.
<https://iaac-aeic.gc.ca/050/evaluations/document/134506>
- Impact Assessment Agency of Canada. *Roberts Bank Terminal 2 Project—Canadian Impact Assessment Registry*.
<https://iaac-aeic.gc.ca/050/evaluations/proj/80054>
- Government of Canada. *Decision Statement Issued Under Section 54 of the Canadian Environmental Assessment Act, 2012—Roberts Bank Terminal 2 Project*.
<https://iaac-aeic.gc.ca/050/evaluations/document/155770>
- Office of the Auditor General of Canada. *Adequacy of the Environmental Risk Assessment of the Roberts Bank Terminal 2 Project in Delta, British Columbia*.
<https://www.canada.ca/en/auditor-general/environmental-petitions/environmental-petitions-catalogue/adequacy-environmental-risk-assessment-roberts-bank-terminal-2-project-in-delta-british-columbia.html>
- Government of Canada. *Question Period Note: Roberts Bank Terminal 2, British Columbia*.
<https://search.open.canada.ca/qpnotes/record/dfo-mpo%2CDFO-2021-QP-00188>

Ramsar and protected-area references

- Ramsar Sites Information Service. *Fraser River Delta—Wetland of International Importance, Site No. 243*.
<https://rsis Ramsar.org/ris/243>
- Convention on Wetlands. *The List of Wetlands of International Importance*.
<https://www Ramsar.org/sites/default/files/2023-08/sitelist.pdf>
- Government of British Columbia. *Roberts Bank Wildlife Management Area*.
<https://www2.gov.bc.ca/gov/content/environment/plants-animals-ecosystems/wildlife/wildlife-habitats/conservation-lands/wma/wmas-list/roberts-bank>

Additional Fraser Estuary and cumulative-effects material

- 
- Government of Canada. Otto Langer. *The Lower Fraser River and Its Estuary*. 2016.
https://www.canada.ca/content/dam/themes/environment/conservation/environmental-reviews/151-Otto_Langer.pdf
 - Transport Canada. Boundary Bay Conservation Committee. *Submission Concerning Roberts Bank Terminal 2 and Canadian Port Governance*.
<https://tc.canada.ca/sites/default/files/migrated/boundarybayconservationcommittee.pdf>
 - Transport Canada. B.C. Great Blue Heron Society. *Submission Concerning Roberts Bank, Port Expansion and Southern Resident Killer Whale Habitat*.
<https://tc.canada.ca/sites/default/files/migrated/bcgreatblueheronsociety.pdf>
 - Transport Canada. Otto Langer. *Critique of Transport Canada's Ports Review and Fraser Estuary Issues*.
<https://tc.canada.ca/sites/default/files/migrated/ottoelanger.pdf>