



September 17, 2026

The Honourable Dominic LeBlanc
President of the King's Privy Council for Canada and
Minister responsible for Canada-U.S. Trade, Intergovernmental Affairs,
Internal Trade and One Canadian Economy

Sent via email: RBT2Comment-CommentaireT2RB@mpo-bgp.gc.ca

RE: SUPPORT FOR LISTING THE ROBERTS BANK TERMINAL 2 PROJECT IN SCHEDULE 1 OF THE *BUILDING CANADA ACT*

Dear Minister LeBlanc:

On behalf of the Independent Contractors and Businesses Association (ICBA), I am writing to express our strong support for listing the Roberts Bank Terminal 2 (RBT2) project in Schedule 1 of the *Building Canada Act*. This project is a critical piece of trade infrastructure available to Canada today, and it has waited long enough.

ICBA is the largest construction association in Canada with more than 6,000 members, clients and affiliated companies, primarily in British Columbia and Alberta. ICBA is a strong advocate for open markets, fair and competitive public tendering, cost-effective regulation, and the responsible development of Canada's natural resources. ICBA is also one of the largest sponsors of trades apprentices in Canada, directly trains thousands of construction professionals every year, and provides group benefit plans to more than 330,000 Canadians. Our members are the contractors and workers who would build RBT2.

The economic case is straightforward. RBT2 would [increase the Port of Vancouver's container handling capacity](#) by nearly 50%, unlocking \$100 billion in annual trade capacity, contributing more than \$3 billion a year to GDP, and supporting over 18,000 construction jobs.

For our members, the benefits run well beyond the build itself. Construction depends on the steel, glazing, elevators and mechanical systems that arrive through the Port of Vancouver. That gateway is currently among the least efficient in the world. The [World Bank's](#) container port performance index, which ranks ports by how quickly they turn ships around, places Vancouver near the bottom globally (375th of 405 ports in its most recent index), and containers at the port [wait close to six days](#) on average for a train — double the three-day target the port authority set for itself. ICBA Chief Economist Jock Finlayson's review of that index found Vancouver ranked behind every major American gateway on the list, including Los Angeles and Long Beach. Transport Canada's own projections indicate a new West Coast terminal could be needed as early as 2030, and those projections date from 2020, before the port set consecutive cargo records in [2024](#) and [2025](#).

When the gateway congests, our members carry the cost. Delayed materials push out schedules, trigger escalation clauses, idle crews and equipment, and inflate the contingencies priced into every bid, quietly adding cost to every home, school, hospital and industrial project built in this province. A new, purpose-built terminal will not fix every constraint at the gateway on its own, but it is the largest single improvement available: modern berths, automated container handling built to current standards, and enough headroom to stop pushing record volumes through facilities that are already full.

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RBT2 is also central to the Government of Canada's trade diversification objectives, including doubling exports to non-US markets by 2035. In 2024, [80%](#) of the international trade that the Port of Vancouver enabled was with countries other than the United States. A [C.D. Howe Institute](#) analysis found that once the United States is set aside, 54% of Canada's export value moves by water. Diversification is in large part a marine problem, and the 2035 target will stay out of reach unless Canada builds the port capacity to support it. The [Montreal Economic Institute](#) has put it more bluntly, arguing Canada simply cannot diversify its trade with uncompetitive ports. RBT2 is the largest single addition to marine container capacity available on Canada's West Coast, and listing it is the fastest way to build it.

ICBA has spent years making the case that Canada's permitting system is where good projects go to stall. Astonishingly, RBT2 has been in the federal regulatory system since [2013](#). It was approved in [2023](#), after a ten-year assessment, subject to [370](#) binding federal conditions and [16](#) provincial ones. Three years later, it is still awaiting final permits. This is not a project that has escaped scrutiny. It is a project that has endured thirteen years of it and now needs the remaining federal permits coordinated rather than sequenced, so construction can start as planned in [2028](#). RBT2 is exactly the kind of project the Building Canada Act was written for. It is a telling indictment of Canada's existing project assessment and permitting regimes that a project proposed by a federal government entity and that is core to improving Canada's competitiveness has been mired in bureaucracy, red tape and endless "public consultations" for close to a decade and a half.

Our members are ready to build. More than 85% of British Columbia's construction workforce does not belong to a building trades union, so a procurement model that restricts bidding to union signatories would shut out the overwhelming majority of the tradespeople needed to build this project and unfairly limit competition for the construction work. ICBA's position is that all work on RBT2 and every associated contract should be tendered on an open, competitive and labour-neutral basis, with contracts awarded on the merits: safety record, qualifications, experience, price, and demonstrated capacity to deliver. Open competition is what produces the lowest responsible price, the deepest pool of qualified bidders, and the schedule certainty a national interest designation is meant to protect.

ICBA urges you to recommend, without delay, that the Federal Government list the Roberts Bank Terminal 2 project in Schedule 1 of the Building Canada Act, and to ensure that the work of building it is open to every qualified Canadian contractor and every skilled Canadian worker. Thank you for your attention to this matter.

Sincerely,

INDEPENDENT CONTRACTORS AND BUSINESSES ASSOCIATION



Chris Gardner

President and CEO

cc:

Hon. Maninder Sidhu, Minister of International Trade maninder.sidhu@international.gc.ca

Hon. Mélanie Joly, Minister of Industry melanie.joly@ised-isde.gc.ca

Stephanie Kusie, Shadow Minister for International Trade stephanie.kusie@parl.gc.ca

Hon. David Eby, Premier of British Columbia premier@gov.bc.ca

BC and Alberta Members of Parliament
