

Submission to OCPM Ray-Mont Logistics

Deception and Disappointment – Installation of RayMont Logistics in the east of Montreal

Steven Middleton – November 4, 2024

The presence of Ray-Mont Logistics (RML) in the borough of Mercier-Hochelaga-Maisonneuve (MHM) seems to be getting increasing attention and criticism from the residents. In addition to growing numbers of containers appearing on its property, a 373 million-dollar lawsuit against the city (and indirectly its taxpayers) by RML did not seem like a successful public relations strategy designed to win support for its intrusion into the neighbourhood.

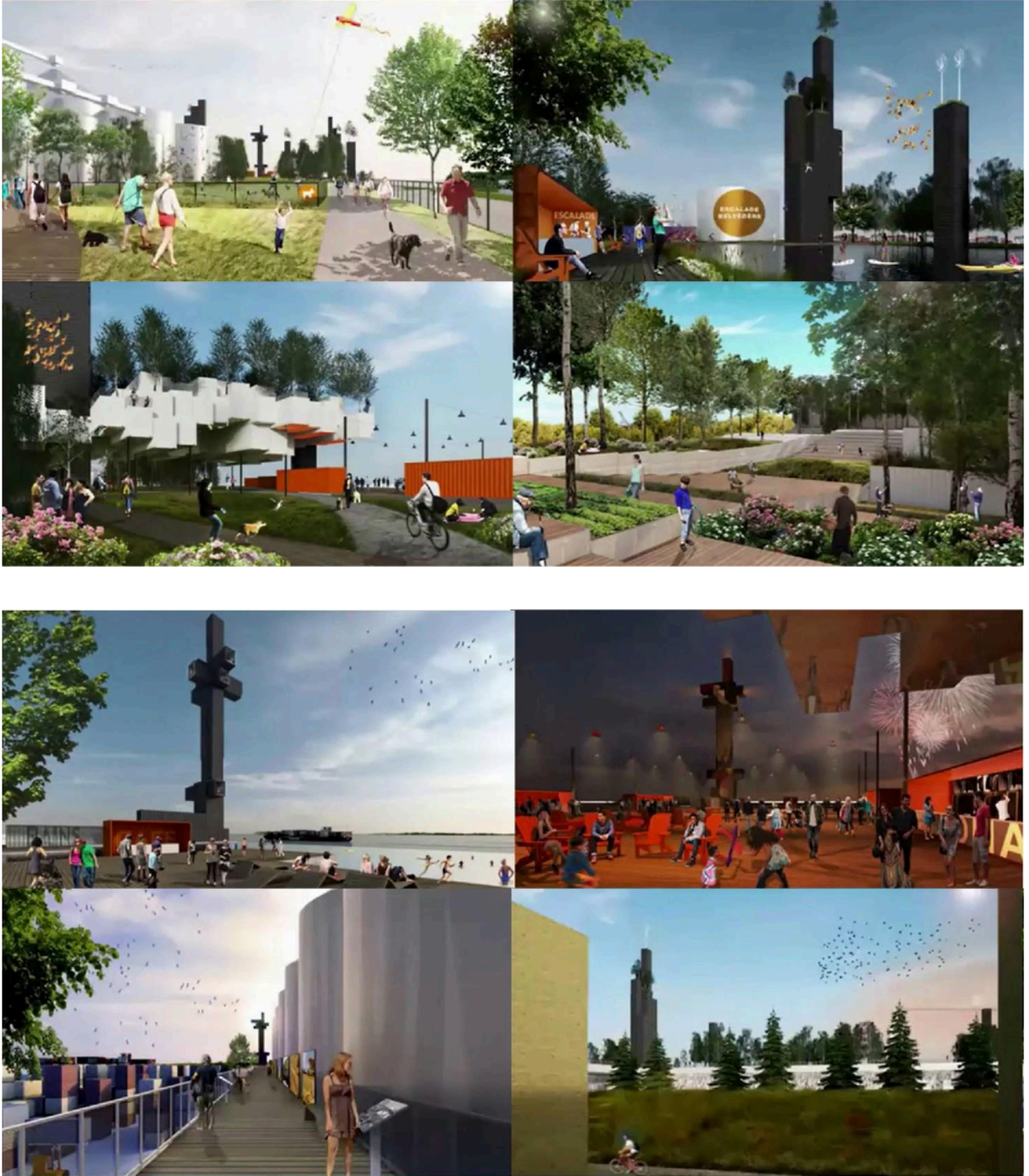
As the implementation of RML proceeds, the City of Montreal is holding a public consultation about RML and its transloading container depot. This consultation is proceeding despite a recent announcement that RML and the city had settled their differences and the lawsuit was resolved.

This settlement with the City seems to suggest nothing now stand in the way of RML achieving its objectives although all the details of the agreement are not available. Since the agreement came while the consultations were still to be held the Gazette newspaper ran an article entitled “It’s not a phony consultation”⁽¹⁾ a story pertaining to the hearings of the OCPM being of little or no value since the city had already agreed to the demands of RML.

What do I think of this? To explain my views it is necessary to go back to April 2021 and the public meeting when Charles Raymond, owner and Chief Executive Officer of RML presented his magnum opus, his vision of a glorious new world (at least in the logistics industry) with a description of his new transloading site (apparently to be the largest such site in North America) and of the peaceful harmonious cohabitation between heavy industry and the residents living in Mercier-Hochelaga-Maisonneuve. Now I freely admit that MHM is not the epitome of bucolic peaceful suburbia however it is home to many residents including me and some of the details of the implementation are not conducive to harmonious cohabitation.

The presentation was quite a show which can be relived by the magic of digital recordings in full colour.⁽²⁾ Each word fully preserved for future generations to see and hear. No room for doubt on what was said and shown by Mr. Charles Raymond. Most impressive were the artists impression from Lemay (<https://lemay.com/fr/>) of green spaces, verdant bicycle paths and walkways, and an outdoor bathing pool with a view overlooking the river. And, for me, the final flourish, an observation point for watching the transloading activities of Ray-Mont Logistics. Surely a subsidy from Tourisme Montreal will be forthcoming and a future entry in Montreal’s top ten attractions.





Strangely, this utopic vision of RML's implantation in the neighborhood was contradicted by none other than Charles Raymond himself. In response to a question as to whether he would like to live next to his company's new transloading depot he replied that its installation would be a "catastrophe", and life would be "l'enfer" for local residents.

This is really a vivid divergence between the proposed reality suggested by the presentation and the actual reality of the future activities. Charles Raymond stating that life is going to be hell seems a little at odds with the vision of greenspaces and touristic activities with views of the river. A second indication of the divergence was that his sketches of the view of the river ignored the inconvenient fact the port was between RML and the majestic Saint-Laurent river. In the presented sketches of his installations the intervening port terminal, port road, port railway, port containers and port storage tanks seemed to have magically vanished. Did somebody inform the port of its infrastructure's imminent removal? Now it may seem trivial to have brought this up but if it is the only material presented by the company of its future operations then we must accept it is correct otherwise the only other conclusion is deliberate deception.

Looking at an image from a meeting held on June 17th 2021 we are given information on some of the project's benefits with numbers describing future activities and the benefits of moving RML from its current location in Pointe St-Charles (PSC).

Un projet durable et responsable pour l'Est de Montréal

Retombées du projet

- **200 nouveaux emplois directs** et nombreux emplois indirects
- 35 M\$ déjà investis, dont **15 M\$ pour réhabiliter les sols**
- **Importants investissements** en infrastructures à venir
- **Projet structurant** pour le Québec avec un accès accru aux marchés mondiaux pour les plus petits producteurs

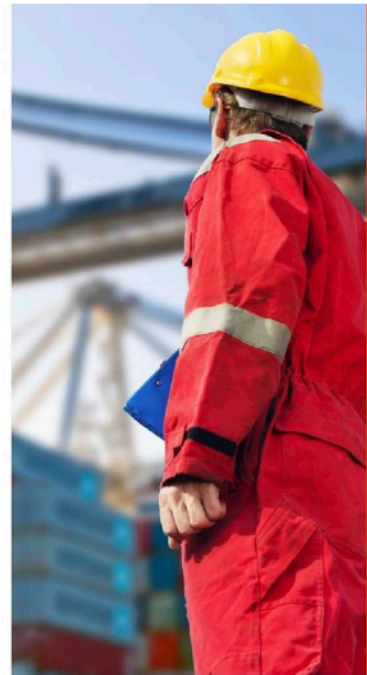
1/3
du camionnage
lourd total

Réduction de
88%

CO₂
Diminution de
82%
DES SES ÉMISSIONS
DE CO₂

Engagement de Ray-Mont Logistiques

- **Participer activement à des discussions sérieuses** avec la Ville de Montréal et à **des travaux de concertation avec les citoyens** pour la mise en place de **mesures de cohabitation rigoureuses et créatives.**



Extrait Instance de concertation ASLP du 17 juin 2021
Présentation_Ville_MHM_Ray-Mont_17Juin_VF.pdf

Now numbers are interesting, they have value, and they clearly show the benefits of RML moving from PSC to MHM. The benefits for the move are overwhelming. The figures indicate a reduction in truck traffic on rue Notre-Dame, with a corresponding 88% reduction in truck miles travelled and 82 % reduction in greenhouse gases. Who could be against that? Maybe RML could get some environmental award to congratulate them on their achievement.

Further research showed the figures supporting this argument are contained in a report dated 2017. It is a report full of figures and if you care to plod through them, you will find they are essentially correct. There is just one problem, and it is a big one. They are not for the Ray-Mont Logistics project that is under review before us. **They are solely for a project to move**

the RML terminal from PSC to MHM and nothing else. This is a much smaller and different project than we are discussing here in this consultation.

If you need proof, look at the figure presented above and ask yourself the following question: when you reduce the distance and time spent trucking (and with it reducing CO₂) why does the project require the creation of 200 new jobs? Surely moving closer to the port and reducing trucking will reduce manpower requirements and save money. What are all the new jobs for? The answer is RML plans to increase its operations significantly and to increase the transloading and storage capacity of the new site far beyond the capacity of the PSC terminal. It is an example of using figures out of context to justify a new different project.

If we are discussing the new entire project, we see a project where the total number of trucks journeys to and from the Port of Montréal increases from about 200 a day (73300 per year in a study by the CIRRELT) to 1500 per day (547500 trips per year) according to the permit issued by the Québec ministry of environment (MELCCFP). Assuming, for ease of calculations, that all those 1500 trips per day are also going to and from the Port of Montréal, are we really in a situation where the yearly distance and the CO₂ emissions are reduced?

Opérations Pointe St-Charles-Port se poursuivent		
Aller-retour PSC - Port de Montréal (page 14)		
73 300 trajets par an - environ 200 trajets par jour		
10.6 km aller	36650 trajets	388490 km total
11.1 km retour	36650 trajets	406815 km total
Total (km)		795305
Consommation carburant		70 L/100 km
Total (L carburant)		556713.5
Taux d'émission CO2		2.28 kg / L carburant
Total (kg CO2)		1269307
Total (tonne métrique CO2)		1269
Nouvelles opérations Mercier-Hochelaga-Maisonneuve		
Aller-retour MHM - Port de Montréal		
Autorisation MELCCFP 547 500 trajets par an - 1500 trajets par jour		
4.1 km aller	273750 trajets	1122375 km total
3 km retour	273750 trajets	821250 km total
Total (km)		1943625
Consommation carburant		70 L/100 km
Total (L carburant)		1360538
Taux d'émission CO2		2.28 kg / L carburant
Total (kg CO2)		3102026
Total (tonne métrique CO2)		3102

No! We are facing an increase of 144%. Why? Ray-Mont Logistics is not just moving to MHM, but he is massively expanding his activities. The yard in MHM is 5 times bigger than the one in PSC, but Ray-Mont is going to increase the volume of activities by 10 to 15 times. Therefore,

the real outcome of the move to MHM is not to reduce truck traffic but to increase it drastically, along with an increase in the noise, pollution, and dirt coming from both the site and from nearby roads.

L'Observatoire de milieux de vie urbains (UQÀM) has stated in November 2021 that the three residential area of Viauville, Guybourg and Haig-Beauclerk (sector Assomption-Sud Longue-Pointe) are already experiencing the worst industrial / residential cohabitation they have evaluated. In a comparative study of 134 "industrial ecoparks" around the world, Guybourg and Haig-Beauclerk finished 135th, the only sites getting the worst score of 9/9! Viauville did a little better finishing among the 17 worst sites with a score of 7/9, mainly because the railway sorting yard is not very active and Ray-Mont in 90 metres away. I can't wait for the revaluation once the yard see one train of 100 wagons everyday at 45 meters from the closest houses. ⁽⁴⁾

Can it get worse? Yes. Not only does RML wants to increase operations far beyond what they are at PSC but do it 24 hours a day, 7 days a week. RML wants to increase its activities to encompass 100 train wagons a day. This is almost a two kilometers long train daily. That's a lot of train. The Longue-Pointe yard at the moment sees one, occasionally two, trains a week of 2 to 7 wagons at the most.

To facilitate all this, RML is currently asking for exemptions (derogations in French) to permit things like 24 hours operation and relief from various regulatory and environmental restrictions. I leave these discussions to others more familiar with them. This is not my subject. However, I will say as forcefully as I can, as a mere citizen, that no exemptions should be permitted. None. If he can't make money with a 7h00 to 17h00, Monday to Friday operation of this size then he is not the business leader he claims to be. He's just being greedy at the expense of others more basic rights to a clean environment with clean air and a quiet liveable environment.

I suspect RML have all the exemptions he wants anyway from the court ruling. Let it rest in peace. RML won the court cases, and the company got its demands. End of story. No more concessions. I am not happy with any settlement which puts potential profits on a higher level than citizen welfare. If environmental laws are so weak that they can be exempted at the drop of a hat, then they have no value.

Which returns to the start. It appears Ray-Mont Logistics has what it wants. Any comments by people about what exemptions should be granted or refused fall on perhaps sympathetic but nevertheless powerless ears. The report of the commission is merely suggestive and can be discarded and ignored. It ultimately seems that the statement in the headline of the Gazette is incorrect. It is a phony consultation. That unhappily is both a deception and a disappointment.

(1) <https://montrealgazette.com/news/local-news/opponents-of-ray-mont-container-yard-project-continue-battle-as-public-consultations-begin>

(2) <https://vimeo.com/543334146>

⁽³⁾https://omv.esg.uqam.ca/wp-content/uploads/sites/90/OMV-ASLP-2021_FicheSynthese1_Demystifier-l-ecoparc-industriel.pdf (Page 8 of 16)