

December 7, 2020

Ms. Shannon Kohler
A/Director Environmental Compliance and Enforcement Branch
Manitoba Conservation & Climate
1007 Century Street
Winnipeg, MB R3H 0W4

Dear Ms. Kohler:

As the COVID-19 pandemic continues, Canadian Kraft Paper Industries' (CKP) concerns with meeting all regulatory compliance continues. In May 2020, CKP contacted your office with a list on non-critical requirements and/or clauses from our licenses that we asked to delay in order to free up some resources for COVID-19 response. On June 2, 2020, your office kindly granted the requested extensions and deferrals.

Looking forward into 2021, the pandemic is going to continue to have significant impact on our business throughout the coming year. There have now been several confirmed cases of COVID-19 in our community and we are concerned about the health and wellbeing of our employees and having enough healthy employees available to operate the mill.

The following is a list of non-critical requirements and/or clauses from our licenses that we would like to deviate or delay to free up some resources if required for CKP's COVID-19 response:

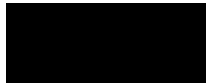
- Environment Act Licence #1339RR – Part A, Section 4 – In your June 2, 2020 letter, flexibility was granted with respect to the deadline to submit monthly effluent report within 30 days of the end of the month. A 90-day extension was granted for the May to August 2020 monitoring months.
 - CKP is requesting another extension of up to 90 days from the end of the month for January to December 2021 monitoring months.
- DGH&T Act Licence #102 HW RRR – Section 16 Air Emission Management – CKP is required to periodically conduct stack testing. The frequency of stack testing is not specified in the Licence, but in general, the agreed upon frequency of stack testing has been bi-annual. The most recent stack testing project was done in 2019 and the next one is scheduled for 2021. There have not been any major changes since 2019 to our boilers or lime kiln that would have significantly changed our air emissions.

CKP is postponing all non-critical contractors from coming onsite during the COVID-19 pandemic. Our preferred stack testing contractor is located in Ontario and would require 14 days isolation as per Public Health orders. This contractor does excellent work for approximately half the cost of other stack testing located in the Prairie Provinces. This is usually a \$70,000 project that would cost well over \$120,000 will a different contractor and given the economic environment we need to avoid additional costs.

- CKP is requesting approval to defer the bi-annual stack testing project until 2022.

Thank you for your consideration to the above requests for temporarily extending the deadline for these non-critical reports and bi-annual testing requirements. CKP will continue to act in a responsible manner toward meeting all regulatory requirements.

Regards,



Tamsin Patience, P. Eng.
Technical Manager

cc:

Honourable Sara Guillemard, Minister of Conversation and Climate
Eshetu Beshada, Environmental Engineer – Approvals Branch – Manitoba Conservation and Climate
Andre Murphy, General Manager – CKP
Ann Evans, Chief Financial Operator – CKP
Leigh Johnston, Environmental Superintendent - CKP