

DATE: July 24, 2020

TO: Luka Zorica
Client Service Support
Environmental Approvals Branch

FROM: Krystal Penner
Pesticide and Agricultural Specialist
Environmental Approvals Branch

SUBJECT: Please post to Public registry.

The attached information can be posted to the public registries for:

- Berger Peat Moss Ltd.
- Client File No. 6055.00

Technical Advisory Committee Comments on Environment Act Proposal – 32 pages.

Public Comments on Environment Act Proposal – 75 pages.

Additional Information – Petition to development, 36 pages.

From: [Porteous, Marianne \(ARD\)](#)
To: [Penner, Krystal \(CC\)](#)
Subject: RE: Request for Review/Comment - Environment Act Proposal – - File 6055.00 - Due: July 2, 2020
Date: June-25-20 2:03:58 PM

Hi Krystal,

We would like to know if peat will be shipped into Manitoba from other provinces/jurisdictions for processing at this facility?

Otherwise no concerns from the Forestry Branch.

Marianne

From: Penner, Krystal (CC) <Krystal.Penner@gov.mb.ca>
Sent: June-23-20 3:30 PM
To: Janusz, Laureen R (ARD) <Laureen.Janusz@gov.mb.ca>; Porteous, Marianne (ARD) <Marianne.Porteous@gov.mb.ca>; Conrod, Matt (ARD) <Matt.Conrod@gov.mb.ca>; Frias, Winifred (ARD) <Winifred.Frias@gov.mb.ca>; Leavesley, Kelly (ARD) <Kelly.Leavesley@gov.mb.ca>; Page, Elaine (ARD) <Elaine.Page@gov.mb.ca>; Phipps, Graham (ARD) <Graham.Phipps@gov.mb.ca>; +WPG1195 - Director Mines (ARD) <DirMines@gov.mb.ca>; Mraz, Peter (ARD) <Peter.Mraz@gov.mb.ca>; Smith, Derek (CC) <Derek.Smith@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>; McDonald, Christina (CC) <Christina.McDonald@gov.mb.ca>; Harman, Kristal (CC) <Kristal.Harman@gov.mb.ca>; Crocker, Peter (CC) <Peter.Crocker@gov.mb.ca>; Suresh, Nada (CC) <Nada.Suresh@gov.mb.ca>; Molod, Rommel (CC) <Rommel.Molod@gov.mb.ca>; Vitt, Cory (CC) <Cory.Vitt@gov.mb.ca>; Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>; Cunningham, Neil (CC) <Neil.Cunningham@gov.mb.ca>; Kelly, Jason (CC) <Jason.Kelly@gov.mb.ca>; +WPG574 - HRB Archaeology (SCH) <HRB.archaeology@gov.mb.ca>; +WPG112 - FireComm (OFC) <FireComm@gov.mb.ca>; Sveinson, Larissa (MR) <Larissa.Sveinson@gov.mb.ca>; Roberecki, Susan (HSAL) <Susan.Roberecki@gov.mb.ca>; Roberts, Tracy (HSAL) <Tracy.Roberts@gov.mb.ca>; +WPG969 - MIT Environmental Services Section (MI) <MITEnviServices@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>
Cc: Webb, Jen (CC) <Jen.Webb@gov.mb.ca>
Subject: Request for Review/Comment - Environment Act Proposal – - File 6055.00 - Due: July 2, 2020
Importance: High

Your review and comments would be appreciated for the following proposal submitted pursuant to The Environment Act.

Public Registry File 6055.00 - Horticultural Mix Plant - Berger Peat Moss Ltd. - Rural Municipality of Springfield

<https://www.gov.mb.ca/sd/eal/registries/6055berger/index.html>

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your department/branch has reviewed the proposal and has no concerns.

Please note all TAC members are being asked to prioritize this review and provide comments by e-mail are requested no later than **Thursday July 2, 2020.**

Thank-you,

Krystal Penner
Pesticide and Agricultural Program Specialist
Environmental Approvals Branch
Department of Conservation and Climate
Government of Manitoba
1007 Century Street, Winnipeg MB R3H 0W4
(204) 945-7107 | Krystal.Penner@gov.mb.ca
www.manitoba.ca

Facts are key in the fight against COVID-19, visit Manitoba.ca/covid19

From: [Kowalchuk, Sheldon \(ARD\)](#)
To: [Penner, Krystal \(CC\)](#)
Subject: RE: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 - Due: July 2, 2020
Date: July-02-20 1:20:08 PM
Attachments: [image003.png](#)

Hi Krystal,

I don't have any comments or concerns with the proposal as there is no Crown land involved. I will defer to the other Departments and Branches to provide comments on their areas of responsibility.

Sheldon Kowalchuk

Land Manager
Agriculture and Resource Development
Government of Manitoba
75 - 7th Avenue, Gimli, MB
204-641-1176
Sheldon.Kowalchuk@gov.mb.ca
www.manitoba.ca



From: Leavesley, Kelly (ARD) <Kelly.Leavesley@gov.mb.ca>
Sent: July-02-20 8:29 AM
To: Kowalchuk, Sheldon (ARD) <Sheldon.Kowalchuk@gov.mb.ca>
Subject: Fwd: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 - Due: July 2, 2020

In case you weren't added to the list

Sent from my iPhone

Begin forwarded message:

From: "Penner, Krystal (CC)" <Krystal.Penner@gov.mb.ca>
Date: July 2, 2020 at 8:11:04 AM CDT
To: "Janusz, Laureen R (ARD)" <Laureen.Janusz@gov.mb.ca>, "Porteous, Marianne (ARD)" <Marianne.Porteous@gov.mb.ca>, "Conrod, Matt (ARD)" <Matt.Conrod@gov.mb.ca>, "Frias, Winifred (ARD)" <Winifred.Frias@gov.mb.ca>, "Leavesley, Kelly (ARD)" <Kelly.Leavesley@gov.mb.ca>, "Page, Elaine (ARD)" <Elaine.Page@gov.mb.ca>, "Phipps, Graham (ARD)" <Graham.Phipps@gov.mb.ca>, "+WPG1195 - Director Mines (ARD)" <DirMines@gov.mb.ca>, "Mraz, Peter (ARD)" <Peter.Mraz@gov.mb.ca>, "Smith, Derek (CC)" <Derek.Smith@gov.mb.ca>, "Graham, Cory (CC)" <Cory.Graham@gov.mb.ca>, "McDonald, Christina (CC)"

<Christina.McDonald@gov.mb.ca>, "Harman, Kristal (CC)"
<Kristal.Harman@gov.mb.ca>, "Crocker, Peter (CC)" <Peter.Crocker@gov.mb.ca>,
"Suresh, Nada (CC)" <Nada.Suresh@gov.mb.ca>, "Molod, Rommel (CC)"
<Rommel.Molod@gov.mb.ca>, "Vitt, Cory (CC)" <Cory.Vitt@gov.mb.ca>, "Hawryliuk,
Yvonne (CC)" <Yvonne.Hawryliuk@gov.mb.ca>, "Cunningham, Neil (CC)"
<Neil.Cunningham@gov.mb.ca>, "Kelly, Jason (CC)" <Jason.Kelly@gov.mb.ca>,
"+WPG574 - HRB Archaeology (SCH)" <HRB.archaeology@gov.mb.ca>, "+WPG112 -
FireComm (OFC)" <FireComm@gov.mb.ca>, "Sveinson, Larissa (MR)"
<Larissa.Sveinson@gov.mb.ca>, "Roberecki, Susan (HSAL)"
<Susan.Roberecki@gov.mb.ca>, "Roberts, Tracy (HSAL)" <Tracy.Roberts@gov.mb.ca>,
"+WPG969 - MIT Environmental Services Section (MI)" <MITEnviServices@gov.mb.ca>,
"Graham, Cory (CC)" <Cory.Graham@gov.mb.ca>
Cc: "Webb, Jen (CC)" <Jen.Webb@gov.mb.ca>
Subject: RE: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 -
Due: July 2, 2020

Just a reminder to all TAC members the due date for comments on the Berger Peat Moss Ltd. project in the RM of Springfield is today.

It has been requested all TAC members prioritize this review. To TAC members that have submitted comments already - thank you for your submissions.

Regards,

Krystal Penner
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Environmental Approvals Branch
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From: Penner, Krystal (CC)
Sent: June-23-20 3:30 PM
To: Janusz, Laureen R (ARD) <Laureen.Janusz@gov.mb.ca>; Porteous, Marianne (ARD) <Marianne.Porteous@gov.mb.ca>; Conrod, Matt (ARD) <Matt.Conrod@gov.mb.ca>; Frias, Winifred (ARD) <Winifred.Frias@gov.mb.ca>; Leavesley, Kelly (ARD) <Kelly.Leavesley@gov.mb.ca>; Page, Elaine (ARD) <Elaine.Page@gov.mb.ca>; Phipps, Graham (ARD) <Graham.Phipps@gov.mb.ca>; +WPG1195 - Director Mines (ARD) <DirMines@gov.mb.ca>; Mraz, Peter (ARD) <Peter.Mraz@gov.mb.ca>; Smith, Derek (CC) <Derek.Smith@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>; McDonald, Christina (CC) <Christina.McDonald@gov.mb.ca>; Harman, Kristal (CC) <Kristal.Harman@gov.mb.ca>; Crocker, Peter (CC) <Peter.Crocker@gov.mb.ca>;

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Cc: Jen Webb (SD) (Jen.Webb@gov.mb.ca) <Jen.Webb@gov.mb.ca>

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(204) 945-7107 | Krystal.Penner@gov.mb.ca
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From: [Vitt, Cory \(CC\)](#)
To: [Penner, Krystal \(CC\)](#)
Subject: RE: Request for Review/Comment - Environment Act Proposal – - File 6055.00 - Due: July 2, 2020
Date: July-03-20 11:54:37 AM

No concerns.

Office of Drinking Water (ODW)

Cory Vitt, CMMA M.Eng. P.Eng.

(pronouns: they/them/he/him; please don't use "Mr. Vitt")

Approvals Engineer

Office of Drinking Water

Department of Conservation and Climate

1007 Century Street

Winnipeg, Manitoba R3H 0W4

Phone: 204-806-1363

Fax: 204-945-1365

Email: Cory.Vitt@gov.mb.ca

From: Penner, Krystal (CC) <Krystal.Penner@gov.mb.ca>

Sent: June 23, 2020 3:28 PM

To: Janusz, Laureen R (ARD) <Laureen.Janusz@gov.mb.ca>; Porteous, Marianne (ARD) <Marianne.Porteous@gov.mb.ca>; Conrod, Matt (ARD) <Matt.Conrod@gov.mb.ca>; Frias, Winifred (ARD) <Winifred.Frias@gov.mb.ca>; Leavesley, Kelly (ARD) <Kelly.Leavesley@gov.mb.ca>; Page, Elaine (ARD) <Elaine.Page@gov.mb.ca>; Phipps, Graham (ARD) <Graham.Phipps@gov.mb.ca>; +WPG1195 - Director Mines (ARD) <DirMines@gov.mb.ca>; Mraz, Peter (ARD) <Peter.Mraz@gov.mb.ca>; Smith, Derek (CC) <Derek.Smith@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>; McDonald, Christina (CC) <Christina.McDonald@gov.mb.ca>; Harman, Kristal (CC) <Kristal.Harman@gov.mb.ca>; Crocker, Peter (CC) <Peter.Crocker@gov.mb.ca>; Suresh, Nada (CC) <Nada.Suresh@gov.mb.ca>; Molod, Rommel (CC) <Rommel.Molod@gov.mb.ca>; Vitt, Cory (CC) <Cory.Vitt@gov.mb.ca>; Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>; Cunningham, Neil (CC) <Neil.Cunningham@gov.mb.ca>; Kelly, Jason (CC) <Jason.Kelly@gov.mb.ca>; +WPG574 - HRB Archaeology (SCH) <HRB.archaeology@gov.mb.ca>; +WPG112 - FireComm (OFC) <FireComm@gov.mb.ca>; Sveinson, Larissa (MR) <Larissa.Sveinson@gov.mb.ca>; Roberecki, Susan (HSAL) <Susan.Roberecki@gov.mb.ca>; Roberts, Tracy (HSAL) <Tracy.Roberts@gov.mb.ca>; +WPG969 - MIT Environmental Services Section (MI) <MITEnviServices@gov.mb.ca>

Cc: Webb, Jen (CC) <Jen.Webb@gov.mb.ca>

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From: [Kelly, Jason \(CC\)](#)
To: [Penner, Krystal \(CC\)](#)
Subject: RE: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 - Due: July 2, 2020
Date: July-06-20 8:12:32 AM

I believe I sent this reply but we have no concerns.

From: Penner, Krystal (CC) <Krystal.Penner@gov.mb.ca>
Sent: July-02-20 8:11 AM
To: Janusz, Laureen R (ARD) <Laureen.Janusz@gov.mb.ca>; Porteous, Marianne (ARD) <Marianne.Porteous@gov.mb.ca>; Conrod, Matt (ARD) <Matt.Conrod@gov.mb.ca>; Frias, Winifred (ARD) <Winifred.Frias@gov.mb.ca>; Leavesley, Kelly (ARD) <Kelly.Leavesley@gov.mb.ca>; Page, Elaine (ARD) <Elaine.Page@gov.mb.ca>; Phipps, Graham (ARD) <Graham.Phipps@gov.mb.ca>; +WPG1195 - Director Mines (ARD) <DirMines@gov.mb.ca>; Mraz, Peter (ARD) <Peter.Mraz@gov.mb.ca>; Smith, Derek (CC) <Derek.Smith@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>; McDonald, Christina (CC) <Christina.McDonald@gov.mb.ca>; Harman, Kristal (CC) <Kristal.Harman@gov.mb.ca>; Crocker, Peter (CC) <Peter.Crocker@gov.mb.ca>; Suresh, Nada (CC) <Nada.Suresh@gov.mb.ca>; Molod, Rommel (CC) <Rommel.Molod@gov.mb.ca>; Vitt, Cory (CC) <Cory.Vitt@gov.mb.ca>; Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>; Cunningham, Neil (CC) <Neil.Cunningham@gov.mb.ca>; Kelly, Jason (CC) <Jason.Kelly@gov.mb.ca>; +WPG574 - HRB Archaeology (SCH) <HRB.archaeology@gov.mb.ca>; +WPG112 - FireComm (OFC) <FireComm@gov.mb.ca>; Sveinson, Larissa (MR) <Larissa.Sveinson@gov.mb.ca>; Roberecki, Susan (HSAL) <Susan.Roberecki@gov.mb.ca>; Roberts, Tracy (HSAL) <Tracy.Roberts@gov.mb.ca>; +WPG969 - MIT Environmental Services Section (MI) <MITEnviServices@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>
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From: [Caillier, Ginette \(CC\)](#)
To: [Hawryliuk, Yvonne \(CC\)](#); [Penner, Krystal \(CC\)](#)
Cc: [Webb, Jen \(CC\)](#); [Lewick, Wendy \(CC\)](#)
Subject: RE: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 - Due: July 2, 2020
Date: July-03-20 4:22:24 PM
Attachments: [image001.png](#)

Good Afternoon,

I am not sure why you did not receive my response last week. Wendy and I have been to the site and have stated to the company that they do not require a licence for Water Control Works as the Environment Licence supersedes ours. The works they did to prepare for the licence was sufficient.

Thank you,

Ginette Caillier
Conservation and Climate
(204) 392-2736

From: Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>
Sent: July-03-20 2:36 PM
To: Penner, Krystal (CC) <Krystal.Penner@gov.mb.ca>
Cc: Webb, Jen (CC) <Jen.Webb@gov.mb.ca>; Lewick, Wendy (CC) <Wendy.Lewick@gov.mb.ca>; Caillier, Ginette (CC) <Ginette.Caillier@gov.mb.ca>
Subject: RE: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 - Due: July 2, 2020

Thank you Krystal. We will have something to you Monday.

Yvonne Hawryliuk, M.Sc.
Acting Director
Conservation and Climate – Drainage and Water Rights Licensing Branch
200 Saulteaux Crescent R3J 3W3
Phone: (204) 801-3016
email: Yvonne.Hawryliuk@gov.mb.ca



24 hr Environmental Emergency Response Line 1-855-944-4888

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From: Penner, Krystal (CC) <Krystal.Penner@gov.mb.ca>

Sent: July 3, 2020 2:16 PM

To: Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>

Cc: Webb, Jen (CC) <Jen.Webb@gov.mb.ca>; Lewick, Wendy (CC) <Wendy.Lewick@gov.mb.ca>

Subject: RE: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 - Due: July 2, 2020

Yvonne,

Just to follow up on this I am just compiling the results of the TAC comments and I only received comment from Kylene and just realized we had no comments respecting drainage.

Please remind staff to comment and if they do so next week. I ask they copy Jen Webb on their response as I will be away next week.

As previously discussed it has come to our attention the drainage plans will be reviewed as part of their approval process for drainage through the EAP.

Wendy Lewick has been our contact on this so copying her as well to make sure she got the request and knows this is a priority review.

Thanks in advance.

Krystal Penner
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From: Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>

Sent: July-02-20 9:00 AM

To: Penner, Krystal (CC) <Krystal.Penner@gov.mb.ca>

Subject: RE: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 - Due: July 2, 2020

Thx

Yvonne Hawryliuk, M.Sc.

Acting Director

Conservation and Climate – Drainage and Water Rights Licensing Branch

200 Saulteaux Crescent R3J 3W3

Phone: (204) 801-3016

email: Yvonne.Hawryliuk@gov.mb.ca



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Sent: July 2, 2020 9:00 AM

To: Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>

Subject: Re: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 - Due: July 2, 2020

Yes Kylene commented. Thanks!

Sent from my iPhone

On Jul 2, 2020, at 8:58 AM, Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca> wrote:

Did you get from group.

Yvonne Hawryliuk, M.Sc.

Acting Director

Conservation and Climate – Drainage and Water Rights Licensing Branch

200 Saulteaux Crescent R3J 3W3

Phone: (204) 801-3016

email: Yvonne.Hawryliuk@gov.mb.ca

<image001.png.awsec>

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Sent: July 2, 2020 8:11 AM

To: Janusz, Laureen R (ARD) <Laureen.Janusz@gov.mb.ca>; Porteous, Marianne (ARD) <Marianne.Porteous@gov.mb.ca>; Conrod, Matt (ARD) <Matt.Conrod@gov.mb.ca>;

Frias, Winifred (ARD) <Winifred.Frias@gov.mb.ca>; Leavesley, Kelly (ARD) <Kelly.Leavesley@gov.mb.ca>; Page, Elaine (ARD) <Elaine.Page@gov.mb.ca>; Phipps, Graham (ARD) <Graham.Phipps@gov.mb.ca>; +WPG1195 - Director Mines (ARD) <DirMines@gov.mb.ca>; Mraz, Peter (ARD) <Peter.Mraz@gov.mb.ca>; Smith, Derek (CC) <Derek.Smith@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>; McDonald, Christina (CC) <Christina.McDonald@gov.mb.ca>; Harman, Kristal (CC) <Kristal.Harman@gov.mb.ca>; Crocker, Peter (CC) <Peter.Crocker@gov.mb.ca>; Suresh, Nada (CC) <Nada.Suresh@gov.mb.ca>; Molod, Rommel (CC) <Rommel.Molod@gov.mb.ca>; Vitt, Cory (CC) <Cory.Vitt@gov.mb.ca>; Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>; Cunningham, Neil (CC) <Neil.Cunningham@gov.mb.ca>; Kelly, Jason (CC) <Jason.Kelly@gov.mb.ca>; +WPG574 - HRB Archaeology (SCH) <HRB.archaeology@gov.mb.ca>; +WPG112 - FireComm (OFC) <FireComm@gov.mb.ca>; Sveinson, Larissa (MR) <Larissa.Sveinson@gov.mb.ca>; Roberecki, Susan (HSAL) <Susan.Roberecki@gov.mb.ca>; Roberts, Tracy (HSAL) <Tracy.Roberts@gov.mb.ca>; +WPG969 - MIT Environmental Services Section (MI) <MITEnviServices@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>
Cc: Webb, Jen (CC) <Jen.Webb@gov.mb.ca>

Subject: RE: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 - Due: July 2, 2020

Importance: High

Just a reminder to all TAC members the due date for comments on the Berger Peat Moss Ltd. project in the RM of Springfield is today.

It has been requested all TAC members prioritize this review. To TAC members that have submitted comments already - thank you for your submissions.

Regards,

Krystal Penner
Pesticide and Agricultural Program Specialist
Environmental Approvals Branch
Department of Conservation and Climate
Government of Manitoba
1007 Century Street, Winnipeg MB R3H 0W4
(204) 945-7107 | Krystal.Penner@gov.mb.ca
www.manitoba.ca

Facts are key in the fight against COVID-19, visit Manitoba.ca/covid19

From: Penner, Krystal (CC)

Sent: June-23-20 3:30 PM

To: Janusz, Laureen R (ARD) <Laureen.Janusz@gov.mb.ca>; Porteous, Marianne (ARD) <Marianne.Porteous@gov.mb.ca>; Conrod, Matt (ARD) <Matt.Conrod@gov.mb.ca>; Frias, Winifred (ARD) <Winifred.Frias@gov.mb.ca>; Leavesley, Kelly (ARD) <Kelly.Leavesley@gov.mb.ca>; Page, Elaine (ARD) <Elaine.Page@gov.mb.ca>; Phipps, Graham (ARD) <Graham.Phipps@gov.mb.ca>; +WPG1195 - Director Mines (ARD)

<DirMines@gov.mb.ca>; Mraz, Peter (ARD) <Peter.Mraz@gov.mb.ca>; Smith, Derek (CC) <Derek.Smith@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>; McDonald, Christina (CC) <Christina.McDonald@gov.mb.ca>; Harman, Kristal (CC) <Kristal.Harman@gov.mb.ca>; Crocker, Peter (CC) <Peter.Crocker@gov.mb.ca>; Suresh, Nada (CC) <Nada.Suresh@gov.mb.ca>; Molod, Rommel (CC) <Rommel.Molod@gov.mb.ca>; Vitt, Cory (CC) <Cory.Vitt@gov.mb.ca>; Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>; Cunningham, Neil (CC) <Neil.Cunningham@gov.mb.ca>; Kelly, Jason (CC) <Jason.Kelly@gov.mb.ca>; +WPG574 - HRB Archaeology (SCH) <HRB.archaeology@gov.mb.ca>; +WPG112 - FireComm (OFC) <FireComm@gov.mb.ca>; Sveinson, Larissa (MR) <Larissa.Sveinson@gov.mb.ca>; Roberecki, Susan (HSAL) <Susan.Roberecki@gov.mb.ca>; Roberts, Tracy (HSAL) <Tracy.Roberts@gov.mb.ca>; +WPG969 - MIT Environmental Services Section (MI) <MITEnviServices@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>
Cc: Jen Webb (SD) (Jen.Webb@gov.mb.ca) <Jen.Webb@gov.mb.ca>

Subject: Request for Review/Comment - Environment Act Proposal – - File 6055.00 -
Due: July 2, 2020

Importance: High

Your review and comments would be appreciated for the following proposal submitted pursuant to The Environment Act.

Public Registry File 6055.00 - Horticultural Mix Plant - Berger Peat Moss Ltd. - Rural Municipality of Springfield

<https://www.gov.mb.ca/sd/eal/registries/6055berger/index.html>

Please indicate if you are unable to review the proposal. A non-reply will be considered as indicating your department/branch has reviewed the proposal and has no concerns.

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Thank-you,

Krystal Penner
Pesticide and Agricultural Program Specialist
Environmental Approvals Branch
Department of Conservation and Climate
Government of Manitoba
1007 Century Street, Winnipeg MB R3H 0W4
(204) 945-7107 | Krystal.Penner@gov.mb.ca
www.manitoba.ca

Facts are key in the fight against COVID-19, visit Manitoba.ca/covid19

From: [Wiseman, Kylene \(CC\)](#)
To: [Penner, Krystal \(CC\)](#)
Cc: [Hawryliuk, Yvonne \(CC\)](#)
Subject: FW: Request for Review/Comment - Environment Act Proposal – - File 6055.00 - Due: July 2, 2020
Date: June-25-20 1:38:51 PM
Attachments: [image001.png](#)
Importance: High

Good morning Krystal,

Based on our understanding of the proposed facility, this project will require a Water Rights Use Licence issued under The Water Rights Act. An application must be submitted.

Thank you,

Kylene Wiseman, P. Geo.

A/Head of Groundwater Licensing
Water Use Licensing Section - Manitoba Conservation and Climate
Box 16 - 200 Saulteaux Crescent Winnipeg MB R3J 3W3
Phone: 204-945-7424
Primary Contact - Email: Kylene.Wiseman@gov.mb.ca

From: Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>
Sent: June 25, 2020 11:41 AM
To: Nicklin, Darren (CC) <Darren.Nicklin@gov.mb.ca>; Caillier, Ginette (CC) <Ginette.Caillier@gov.mb.ca>; Butterfield, Tamara (CC) <Tamara.Butterfield@gov.mb.ca>; Wiseman, Kylene (CC) <Kylene.Wiseman@gov.mb.ca>
Subject: FW: Request for Review/Comment - Environment Act Proposal – - File 6055.00 - Due: July 2, 2020
Importance: High

Please note quick turnaround for this. Please cc me on the comments.

Yvonne Hawryliuk, M.Sc.
Acting Director
Conservation and Climate – Drainage and Water Rights Licensing Branch
200 Saulteaux Crescent R3J 3W3
Phone: (204) 801-3016
email: Yvonne.Hawryliuk@gov.mb.ca



24 hr Environmental Emergency Response Line 1-855-944-4888

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have received this communication in error, please notify the sender immediately by telephone and permanently delete the original message, attachments and all copies

From: Penner, Krystal (CC) <Krystal.Penner@gov.mb.ca>

Sent: June 23, 2020 3:30 PM

To: Janusz, Laureen R (ARD) <Laureen.Janusz@gov.mb.ca>; Porteous, Marianne (ARD) <Marianne.Porteous@gov.mb.ca>; Conrod, Matt (ARD) <Matt.Conrod@gov.mb.ca>; Frias, Winifred (ARD) <Winifred.Frias@gov.mb.ca>; Leavesley, Kelly (ARD) <Kelly.Leavesley@gov.mb.ca>; Page, Elaine (ARD) <Elaine.Page@gov.mb.ca>; Phipps, Graham (ARD) <Graham.Phipps@gov.mb.ca>; +WPG1195 - Director Mines (ARD) <DirMines@gov.mb.ca>; Mraz, Peter (ARD) <Peter.Mraz@gov.mb.ca>; Smith, Derek (CC) <Derek.Smith@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>; McDonald, Christina (CC) <Christina.McDonald@gov.mb.ca>; Harman, Kristal (CC) <Kristal.Harman@gov.mb.ca>; Crocker, Peter (CC) <Peter.Crocker@gov.mb.ca>; Suresh, Nada (CC) <Nada.Suresh@gov.mb.ca>; Molod, Rommel (CC) <Rommel.Molod@gov.mb.ca>; Vitt, Cory (CC) <Cory.Vitt@gov.mb.ca>; Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>; Cunningham, Neil (CC) <Neil.Cunningham@gov.mb.ca>; Kelly, Jason (CC) <Jason.Kelly@gov.mb.ca>; +WPG574 - HRB Archaeology (SCH) <HRB.archaeology@gov.mb.ca>; +WPG112 - FireComm (OFC) <FireComm@gov.mb.ca>; Sveinson, Larissa (MR) <Larissa.Sveinson@gov.mb.ca>; Roberecki, Susan (HSAL) <Susan.Roberecki@gov.mb.ca>; Roberts, Tracy (HSAL) <Tracy.Roberts@gov.mb.ca>; +WPG969 - MIT Environmental Services Section (MI) <MITEnviServices@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>

Cc: Webb, Jen (CC) <Jen.Webb@gov.mb.ca>

Subject: Request for Review/Comment - Environment Act Proposal – - File 6055.00 - Due: July 2, 2020

Importance: High

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Public Registry File 6055.00 - Horticultural Mix Plant - Berger Peat Moss Ltd. - Rural Municipality of Springfield

<https://www.gov.mb.ca/sd/eal/registries/6055berger/index.html>

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Thank-you,

Krystal Penner
Pesticide and Agricultural Program Specialist
Environmental Approvals Branch
Department of Conservation and Climate
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DATE: 06 July, 2020

TO: Krystal Penner
Environmental Approvals Branch
Manitoba Conservation & Climate
1007 Century Street, Winnipeg

FROM: Muntaseer Ibn Azkar
Air Quality Section
Environmental Approvals Branch
Manitoba Conservation & Climate
1007 Century Street, Winnipeg

SUBJECT: Horticultural Mix Plant - Berger Peat Moss Ltd. - (File 6055.00)

Air Quality Section has reviewed the above proposal and provides the following comments:

- It is expected that there will be no significant impact on surrounding air quality provided that the plant will be equipped two dust collectors for mitigating potential dust generation (or particulate matter) from the plant.
- Also, it is expected that the emissions from vehicles and equipment during the construction and operation phase will be mitigated as mentioned in the proposal.



DATE: June 29, 2020

TO: Krystal Penner
Environmental Approvals
Conservation and Climate
1007 Century Street
Winnipeg MB R3H 0W4

FROM: Marguerite Reimer
Environmental Compliance and
Enforcement
Conservation and Climate
1007 Century Street
Winnipeg MB R3H 0W4
P: (204) 945-7016
F: (204) 948-3833

SUBJECT: Environment Act Proposal – Horticultural Mix Plant - Berger Peat Moss Ltd. (Client File No. 6055.00) - Rural Municipality of Springfield

Environmental Compliance and Enforcement has reviewed the above noted Environment Act Proposal and can provide the following comments:

- In accordance with the Onsite Wastewater Management Systems Regulation M.R. 83/2003, all new or modified onsite wastewater management systems must be registered with Manitoba Conservation and Climate prior to installation.
- Recording of wastewater production volume at the Development is recommended. Wastewater production volumes totaling 10,000 L/day or greater require a wastewater management system to be licensed, as per the Classes of Development Regulation M.R. 164/88.
- Please provide a copy of the record from the wastewater treatment facility with which Berger has entered into a wastewater acceptance agreement.
- Please provide clarification of the total number of employees at the site in a 24-hour period.
- The proposal states that the nearest residences are over 500 m from the Development. According to measurements on Google Earth, this is not the case. Please provide a more accurate measurement from the nearest residences to the proposed Development site on the property at NW 23-11-04 EPM.
- Please provide more detailed information regarding the dust collection system and recirculation of particulate peat.
- The proponent must ensure truck transport loads are securely covered during transport to and from the Development.
- The proponent must take all appropriate measures to limit wind entrainment of the peat beyond the property boundary of the Development.
- Please provide more detailed information regarding the noise level expected from the Development, including anticipated decibel levels and noise mitigation measures to be used at the Development.
- Please provide details of chemical containment in the storage and processing buildings, ie: curbs, ramps, floor drainage/containment.
- It is recommended the proponent create and maintain an inventory in duplicate of all chemical products stored at the Development.
- Hazardous Waste Registration for the Development may be required if the Development anticipates generating and storing waste of the types and amounts as per the Hazardous Waste Regulation M.R. 195/2015.
- Please note that above-ground petroleum storage facilities with a total storage capacity of less than 5000 L do not require a permit under the Storage and Handling of Petroleum Products and Allied Products Regulation M.R. 188/2001, but are still subject to partial application of the regulation.

- Surface water may only be discharged from the containment area if no spills or contamination have occurred, or with authorization from an Environment Officer.
- The field-stored manure at the south end of the property from the previous horse stable operation must be removed and land-applied as per the Livestock Manure and Mortalities Management Regulation M.R. 42/98.
- In the event of a fire, release, spill, leak or discharge of a pollutant or contaminant to the environment, immediately report the incident to Manitoba Conservation and Climate by calling the 24-hour Emergency Response Line at (204) 944-4888 or 1-855-944-4888. Provide a report following the incident with details of the occurrence, clean-up actions and future mitigation of a similar event.

From: [Phipps, Graham \(ARD\)](#)
To: [Penner, Krystal \(CC\)](#)
Cc: [Webb, Jen \(CC\)](#)
Subject: RE: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 - Due: July 2, 2020
Date: July-20-20 1:56:13 PM
Attachments: [image003.png](#)

Hi Krystal,

In response to your request I have reviewed the well reports associated with this application. The reports indicate that there is 44 to 48 feet (13.4 to 14.6 metres) of clay overlying 20 to 33 feet (6.1 to 10.1 metres) of glacial till above the carbonate aquifer in which the wells are completed. It is reported that the entire casing length has been grouted in both wells. Based on the well report information, the type and thickness of the overburden material provides excellent protection to the aquifer from surface activities.

The hydrogeological report states that "The water supply distribution system will include two supply wells for redundancy purposes." It also shows that two wells were completed in November 2019. Figure 2 in the application indicates that there is an existing well on the property. As the hydrogeologic report indicates two wells will provide the water supply the existing, well shall be sealed and a sealing report submitted as required by regulation.

Regards,

Graham Phipps, Ph.D., P.Geo.
Manager, Groundwater Section
18-200 Saulteaux Cres.
Winnipeg, MB R3J 3W3
P(204) 945-8359 F(204) 948-2357



From: Penner, Krystal (CC)
Sent: July-02-20 8:11 AM
To: Janusz, Lauren R (ARD) <Laureen.Janusz@gov.mb.ca>; Porteous, Marianne (ARD) <Marianne.Porteous@gov.mb.ca>; Conrod, Matt (ARD) <Matt.Conrod@gov.mb.ca>; Frias, Winifred (ARD) <Winifred.Frias@gov.mb.ca>; Leavesley, Kelly (ARD) <Kelly.Leavesley@gov.mb.ca>; Page, Elaine (ARD) <Elaine.Page@gov.mb.ca>; Phipps, Graham (ARD) <Graham.Phipps@gov.mb.ca>; +WPG1195 - Director Mines (ARD) <DirMines@gov.mb.ca>; Mraz, Peter (ARD) <Peter.Mraz@gov.mb.ca>; Smith, Derek (CC) <Derek.Smith@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>; McDonald, Christina (CC) <Christina.McDonald@gov.mb.ca>; Harman, Kristal (CC) <Kristal.Harman@gov.mb.ca>; Crocker, Peter (CC) <Peter.Crocker@gov.mb.ca>; Suresh, Nada (CC) <Nada.Suresh@gov.mb.ca>; Molod, Rommel (CC) <Rommel.Molod@gov.mb.ca>; Vitt, Cory (CC) <Cory.Vitt@gov.mb.ca>; Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>; Cunningham, Neil (CC) <Neil.Cunningham@gov.mb.ca>; Kelly, Jason (CC) <Jason.Kelly@gov.mb.ca>; +WPG574 - HRB Archaeology (SCH) <HRB.archaeology@gov.mb.ca>; +WPG112 - FireComm (OFC)

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Subject: RE: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 - Due: July 2, 2020

Importance: High

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2020

Importance: High

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Environmental Approvals Branch
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From: [+WPG574 - HRB Archaeology \(SCH\)](#)
To: [Penner, Krystal \(CC\)](#)
Subject: RE: Request for Review/Comment - Environment Act Proposal – - File 6055.00 - Due: July 2, 2020
Date: June-25-20 2:05:05 PM

Good afternoon,

Further to your request for the above noted heritage screening, the Historic Resources Branch has examined the location in conjunction with Branch records for areas of potential concern. The potential to impact significant heritage resources is believed to be low and, therefore, the Historic Resources Branch has no concerns with the proposed development at this time.

If at any time, however, heritage resources are encountered in association with these lands during testing and development, the Historic Resources Branch may require that an acceptable heritage resource management strategy be implemented by the developer to mitigate the effects of development on the heritage resources.

If you have any questions or comments, please feel free to contact the Branch as below.

Brittany Romano
Impact Assessment Archaeologist
Historic Resources Branch | Manitoba Sport, Culture and Heritage
213 Notre Dame Avenue, Main Floor | Winnipeg, MB | R3B 1N3
brittanyromano@gov.mb.ca

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Sent: June 23, 2020 3:30 PM

To: Janusz, Laureen R (ARD) <Laureen.Janusz@gov.mb.ca>; Porteous, Marianne (ARD) <Marianne.Porteous@gov.mb.ca>; Conrod, Matt (ARD) <Matt.Conrod@gov.mb.ca>; Frias, Winifred (ARD) <Winifred.Frias@gov.mb.ca>; Leavesley, Kelly (ARD) <Kelly.Leavesley@gov.mb.ca>; Page, Elaine (ARD) <Elaine.Page@gov.mb.ca>; Phipps, Graham (ARD) <Graham.Phipps@gov.mb.ca>; +WPG1195 - Director Mines (ARD) <DirMines@gov.mb.ca>; Mraz, Peter (ARD) <Peter.Mraz@gov.mb.ca>; Smith, Derek (CC) <Derek.Smith@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>; McDonald, Christina (CC) <Christina.McDonald@gov.mb.ca>; Harman, Kristal (CC) <Kristal.Harman@gov.mb.ca>; Crocker, Peter (CC) <Peter.Crocker@gov.mb.ca>; Suresh, Nada (CC) <Nada.Suresh@gov.mb.ca>; Molod, Rommel (CC) <Rommel.Molod@gov.mb.ca>; Vitt, Cory (CC) <Cory.Vitt@gov.mb.ca>; Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>; Cunningham, Neil (CC) <Neil.Cunningham@gov.mb.ca>; Kelly, Jason (CC) <Jason.Kelly@gov.mb.ca>; +WPG574 - HRB Archaeology (SCH) <HRB.archaeology@gov.mb.ca>; +WPG112 - FireComm (OFC) <FireComm@gov.mb.ca>; Sveinson, Larissa (MR) <Larissa.Sveinson@gov.mb.ca>; Roberecki, Susan (HSAL) <Susan.Roberecki@gov.mb.ca>; Roberts, Tracy (HSAL) <Tracy.Roberts@gov.mb.ca>; +WPG969 - MIT Environmental Services Section (MI) <MITEnviServices@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>

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From: [+WPG969 - MIT Environmental Services Section \(MI\)](#)
To: [Penner, Krystal \(CC\)](#)
Cc: [Webb, Jen \(CC\)](#)
Subject: RE: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 - Due: July 2, 2020
Date: July-06-20 6:52:13 AM

MI has no concern with the proposed development. Thank you for the opportunity to review and comment.

From: Penner, Krystal (CC) <Krystal.Penner@gov.mb.ca>
Sent: July 3, 2020 2:35 PM
To: +WPG969 - MIT Environmental Services Section (MI) <MITEnviServices@gov.mb.ca>
Subject: FW: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 - Due: July 2, 2020
Importance: High

Just wanted to bring this to the top of the inbox as I had not received comment yet MIT. Please note this file has been flagged as a priority for staff to review.

If you can provide comment by early next week it would be much appreciated.

I will be away July 6-10 inclusive so if you can copy Jen Webb on your response that would be much appreciated.

Thank-you,

Krystal Penner
Pesticide and Agricultural Program Specialist
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From: Penner, Krystal (CC)
Sent: July-02-20 8:11 AM
To: Janusz, Lauren R (ARD) <Laureen.Janusz@gov.mb.ca>; Porteous, Marianne (ARD) <Marianne.Porteous@gov.mb.ca>; Conrod, Matt (ARD) <Matt.Conrod@gov.mb.ca>; Frias, Winifred (ARD) <Winifred.Frias@gov.mb.ca>; Leavesley, Kelly (ARD) <Kelly.Leavesley@gov.mb.ca>; Page, Elaine (ARD) <Elaine.Page@gov.mb.ca>; Phipps, Graham (ARD) <Graham.Phipps@gov.mb.ca>; +WPG1195 - Director Mines (ARD) <DirMines@gov.mb.ca>; Mraz, Peter (ARD) <Peter.Mraz@gov.mb.ca>; Smith, Derek (CC) <Derek.Smith@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>; McDonald, Christina (CC) <Christina.McDonald@gov.mb.ca>; Harman, Kristal (CC) <Kristal.Harman@gov.mb.ca>; Crocker, Peter (CC) <Peter.Crocker@gov.mb.ca>; Suresh, Nada (CC) <Nada.Suresh@gov.mb.ca>; Molod, Rommel (CC) <Rommel.Molod@gov.mb.ca>; Vitt, Cory (CC) <Cory.Vitt@gov.mb.ca>; Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>;

Cunningham, Neil (CC) <Neil.Cunningham@gov.mb.ca>; Kelly, Jason (CC) <Jason.Kelly@gov.mb.ca>; +WPG574 - HRB Archaeology (SCH) <HRB.archaeology@gov.mb.ca>; +WPG112 - FireComm (OFC) <FireComm@gov.mb.ca>; Sveinson, Larissa (MR) <Larissa.Sveinson@gov.mb.ca>; Roberecki, Susan (HSAL) <Susan.Roberecki@gov.mb.ca>; Roberts, Tracy (HSAL) <Tracy.Roberts@gov.mb.ca>; +WPG969 - MIT Environmental Services Section (MI) <MITEnviServices@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>

Cc: Jen Webb (SD) (Jen.Webb@gov.mb.ca) <Jen.Webb@gov.mb.ca>

Subject: RE: Request for Review/Comment - Berger Peat Moss Ltd - File 6055.00 - Due: July 2, 2020

Importance: High

Just a reminder to all TAC members the due date for comments on the Berger Peat Moss Ltd. project in the RM of Springfield is today.

It has been requested all TAC members prioritize this review. To TAC members that have submitted comments already - thank you for your submissions.

Regards,

Krystal Penner
Pesticide and Agricultural Program Specialist
Environmental Approvals Branch
Department of Conservation and Climate
Government of Manitoba
1007 Century Street, Winnipeg MB R3H 0W4
(204) 945-7107 | Krystal.Penner@gov.mb.ca
www.manitoba.ca

Facts are key in the fight against COVID-19, visit Manitoba.ca/covid19

From: Penner, Krystal (CC)

Sent: June-23-20 3:30 PM

To: Janusz, Laureen R (ARD) <Laureen.Janusz@gov.mb.ca>; Porteous, Marianne (ARD) <Marianne.Porteous@gov.mb.ca>; Conrod, Matt (ARD) <Matt.Conrod@gov.mb.ca>; Frias, Winifred (ARD) <Winifred.Frias@gov.mb.ca>; Leavesley, Kelly (ARD) <Kelly.Leavesley@gov.mb.ca>; Page, Elaine (ARD) <Elaine.Page@gov.mb.ca>; Phipps, Graham (ARD) <Graham.Phipps@gov.mb.ca>; +WPG1195 - Director Mines (ARD) <DirMines@gov.mb.ca>; Mraz, Peter (ARD) <Peter.Mraz@gov.mb.ca>; Smith, Derek (CC) <Derek.Smith@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>; McDonald, Christina (CC) <Christina.McDonald@gov.mb.ca>; Harman, Kristal (CC) <Kristal.Harman@gov.mb.ca>; Crocker, Peter (CC) <Peter.Crocker@gov.mb.ca>; Suresh, Nada (CC) <Nada.Suresh@gov.mb.ca>; Molod, Rommel (CC) <Rommel.Molod@gov.mb.ca>; Vitt, Cory (CC) <Cory.Vitt@gov.mb.ca>; Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>; Cunningham, Neil (CC) <Neil.Cunningham@gov.mb.ca>; Kelly, Jason (CC) <Jason.Kelly@gov.mb.ca>; +WPG574 - HRB Archaeology (SCH) <HRB.archaeology@gov.mb.ca>; +WPG112 - FireComm (OFC) <FireComm@gov.mb.ca>; Sveinson, Larissa (MR) <Larissa.Sveinson@gov.mb.ca>; Roberecki, Susan (HSAL) <Susan.Roberecki@gov.mb.ca>; Roberts, Tracy (HSAL) <Tracy.Roberts@gov.mb.ca>; +WPG969 - MIT Environmental Services Section (MI) <MITEnviServices@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>

Cc: Jen Webb (SD) (Jen.Webb@gov.mb.ca) <Jen.Webb@gov.mb.ca>

Subject: Request for Review/Comment - Environment Act Proposal – - File 6055.00 - Due: July 2, 2020

Importance: High

Your review and comments would be appreciated for the following proposal submitted pursuant to The Environment Act.

Public Registry File 6055.00 - Horticultural Mix Plant - Berger Peat Moss Ltd. - Rural Municipality of Springfield

<https://www.gov.mb.ca/sd/eal/registries/6055berger/index.html>

Please indicate if you are unable to review the proposal. A non-reply will be considered as indicating your department/branch has reviewed the proposal and has no concerns.

Please note all TAC members are being asked to prioritize this review and provide comments by e-mail no later than **Thursday July 2, 2020.**

Thank-you,

Krystal Penner
Pesticide and Agricultural Program Specialist
Environmental Approvals Branch
Department of Conservation and Climate
Government of Manitoba
1007 Century Street, Winnipeg MB R3H 0W4
(204) 945-7107 | Krystal.Penner@gov.mb.ca
www.manitoba.ca

Facts are key in the fight against COVID-19, visit Manitoba.ca/covid19

From: [Pochailo, Janis \(MR\)](#)
To: [Penner, Krystal \(CC\)](#)
Cc: [Sveinson, Larissa \(MR\)](#)
Subject: Request for Review/Comment - Environment Act Proposal – - File 6055.00 - Due: July 2, 2020
Date: June-26-20 1:14:58 PM

Re. Environment Act Proposal
Public Registry File 6055.00
Horticultural Mix Plant - Berger Peat Moss Ltd.
Rural Municipality of Springfield

Thank you for the opportunity to comment on Environment Act Proposal 6055, Berger Peat Moss Limited. I have reviewed the proposal on behalf of Manitoba Municipal Relations, Community Planning Branch and offer the following comments.

Although the by-law amendment referred to in Council Resolution 19-195 has yet to be approved. Development Permit DX 2020-21 was issued based on current zoning by-law definitions for the following permitted uses:

- **Agricultural Activities** means a use of land for agricultural purposes. Typical uses include farming, pasturage, agriculture, apiculture, aquaculture, floriculture and horticulture.
- **Agri-Business** means a commercial establishment that provides goods or services to the agricultural sector.
- **Agriculture Support Industry** means an industry, commercial service or retail business in which the major product or service being bought, sold or processed is intended mainly for, from or by farmers.
- **Agricultural Product Storage** means the temporary storage of any agricultural product for future use, delivery or processing as per The Environment Act.

The Environment Act proposal indicates that the business in question provides a “range of high quality products and services designed for the needs of commercial horticultural customers.” It also states that the “sale of horticultural mixes (is) primarily to professional greenhouse growers and producers in Canada.” As such, the proposed land use appears to fit within the definition of Agri-business or Agricultural Support Industry. Community Planning Branch therefore has no concerns.

Thank you,

Janis Pochailo, RPP, MCIP

Community Planner, Community Planning Branch
Manitoba Municipal Relations

Janis.Pochailo@gov.mb.ca / Tel: 204-268-6065
Box 50, L01 – 20 First Street, Beausejour, MB R0E 0C0

Facts are key in the fight against COVID-19, visit **Manitoba.ca/covid-19**

From: [Garcia, Norman \(MR\)](#)
To: [Penner, Krystal \(CC\)](#)
Cc: [Morhun, Lisa \(MR\)](#); [Escarlan, Mary Lynn \(MR\)](#)
Subject: RE: Request for Review/Comment - Environment Act Proposal – - File 6055.00 - Due: July 2, 2020
Date: June-26-20 2:18:12 PM

Good afternoon Krystal,

Thank you for the opportunity to review this file and provide comments.

The ITSM recommends that:

- the applicant obtain the required building and occupancy permits from the authority having jurisdiction for any new buildings and the alteration, reconstruction, demolition, removal, relocation, and occupancy of all existing buildings, and
- an emergency plan be filed and approved by the local fire department prior to occupancy in accordance with the Manitoba Fire Code.

Regards,

Norman A. Garcia, P.Eng., LEED AP BD+C

Building and Fire Safety Engineer
Inspection and Technical Services
Municipal Relations
norman.garcia@gov.mb.ca / 204-794-3840
508-401 York Ave., Winnipeg, MB R3C 0P8

From: Escarlan, Mary Lynn (MR) <MaryLynn.Escarlan@gov.mb.ca>
Sent: June 23, 2020 3:33 PM
To: Garcia, Norman (MR) <Norman.Garcia@gov.mb.ca>
Cc: Morhun, Lisa (MR) <Lisa.Morhun@gov.mb.ca>
Subject: FW: Request for Review/Comment - Environment Act Proposal – - File 6055.00 - Due: July 2, 2020
Importance: High

Hi Norman,

Please see email below for response. CC' for tracking. Thank you.

Lynn Escarlan, Scheduling Clerk
Inspection and Technical Services
Municipal Relations



From: Penner, Krystal (CC) <Krystal.Penner@gov.mb.ca>
Sent: June-23-20 3:28 PM
To: Janusz, Laureen R (ARD) <Laureen.Janusz@gov.mb.ca>; Porteous, Marianne (ARD)

<Marianne.Porteous@gov.mb.ca>; Conrod, Matt (ARD) <Matt.Conrod@gov.mb.ca>; Frias, Winifred (ARD) <Winifred.Frias@gov.mb.ca>; Leavesley, Kelly (ARD) <Kelly.Leavesley@gov.mb.ca>; Page, Elaine (ARD) <Elaine.Page@gov.mb.ca>; Phipps, Graham (ARD) <Graham.Phipps@gov.mb.ca>; +WPG1195 - Director Mines (ARD) <DirMines@gov.mb.ca>; Mraz, Peter (ARD) <Peter.Mraz@gov.mb.ca>; Smith, Derek (CC) <Derek.Smith@gov.mb.ca>; Graham, Cory (CC) <Cory.Graham@gov.mb.ca>; McDonald, Christina (CC) <Christina.McDonald@gov.mb.ca>; Harman, Kristal (CC) <Kristal.Harman@gov.mb.ca>; Crocker, Peter (CC) <Peter.Crocker@gov.mb.ca>; Suresh, Nada (CC) <Nada.Suresh@gov.mb.ca>; Molod, Rommel (CC) <Rommel.Molod@gov.mb.ca>; Vitt, Cory (CC) <Cory.Vitt@gov.mb.ca>; Hawryliuk, Yvonne (CC) <Yvonne.Hawryliuk@gov.mb.ca>; Cunningham, Neil (CC) <Neil.Cunningham@gov.mb.ca>; Kelly, Jason (CC) <Jason.Kelly@gov.mb.ca>; +WPG574 - HRB Archaeology (SCH) <HRB.archaeology@gov.mb.ca>; +WPG112 - FireComm (OFC) <FireComm@gov.mb.ca>; Sveinson, Larissa (MR) <Larissa.Sveinson@gov.mb.ca>; Roberecki, Susan (HSAL) <Susan.Roberecki@gov.mb.ca>; Roberts, Tracy (HSAL) <Tracy.Roberts@gov.mb.ca>; +WPG969 - MIT Environmental Services Section (MI) <MITEnviServices@gov.mb.ca>

Cc: Webb, Jen (CC) <Jen.Webb@gov.mb.ca>

Subject: Request for Review/Comment - Environment Act Proposal – - File 6055.00 - Due: July 2, 2020

Importance: High

Your review and comments would be appreciated for the following proposal submitted pursuant to The Environment Act.

Public Registry File 6055.00 - Horticultural Mix Plant - Berger Peat Moss Ltd. - Rural Municipality of Springfield

<https://www.gov.mb.ca/sd/eal/registries/6055berger/index.html>

Please indicate if you are unable to review the proposal. A non-reply will be considered as indicating your department/branch has reviewed the proposal and has no concerns.

Please note all TAC members are being asked to prioritize this review and provide comments by e-mail are requested no later than **Thursday July 2, 2020.**

Thank-you,

Krystal Penner
Pesticide and Agricultural Program Specialist
Environmental Approvals Branch
Department of Conservation and Climate
Government of Manitoba
1007 Century Street, Winnipeg MB R3H 0W4
(204) 945-7107 | Krystal.Penner@gov.mb.ca
www.manitoba.ca

Facts are key in the fight against COVID-19, visit Manitoba.ca/covid19

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: [SPF Softfail] [SPF Softfail] Berger Mixing Plant
Date: July-14-20 7:39:59 AM

Hi Krystal,

I'm writing you this letter to voice my opinion on the Berger Mixing Plant close to our house. We are deeply concerned about the way our lives will be changed if this plant continues its operation.

We were not informed of these changes before they started to happen. Did the company have proper permits in place for the work it's doing? – Beforehand? Was the land properly zoned for this kind of business?

We are concerned about our water supply. Can we be assured that it will stay the same? In the event that it may be contaminated or if our wells run dry, who will be responsible for this? It shouldn't be us.

We are also concerned about noise, light and air pollution as well as the value of our land. We moved out of the city for peace and quiet and to enjoy the outdoors. If this operation changes our quality of life, we need to put a stop to it. Why were we not informed before all of this began? We need a meeting set up so that (we) residents can voice our opinion and do something to help protect our families.

We hope you can help us keep our home and way of living as it was before the plant started operating.

Also my next point is very important. About a year or two ago, I wanted to see if I could get a permit to run a gravel truck from my home. 1 gravel truck. Just one! I was told no. Flat out, 100% NO! I was told that this area was not zoned for that! I was also told that they would come and shut me down right away if I tried it. So why now is this allowed to happen? This is 100 times of a bigger operation than what I wanted to do. I find this very disturbing that this was allowed to happen without consulting any residents in the area. This is very worrisome. I hope you can help us voice our opinion and put a stop to this. This is very, very unfair. Residences in the area should have been taken into consideration beforehand. I would like to know why this big company is allowed to operate the way it is and the way it plans on. I would like to know why I was rejected and they weren't.

Thank you for taking the time to read my letter. If you have any comments, questions or need to get a hold of me, I can be reached at the following:

Willi Hiebert

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: 22054 Oakwood Rd. Berger
Date: July-09-20 6:20:19 PM

Hi,

My name is Andrew Booy. I live on Lorne Hill Rd. I would like to have a location change for the Berger Mixing Plant, or at least a public hearing addresses the concerns with this plant coming in. There will be additional light pollution, water pollution, and heavier traffic in a residential area. There are families with kids in this area who walk, bike and live here.

Thank you,
Andrew Booy

[REDACTED]
[REDACTED]
July 20, 2020

Krystal Penner
Environmental Approvals Branch
Climate and Conservation
1007 Century Street
Winnipeg, MB R3H 0W4

Dear Ms. Penner:

Re: Berger Peat Moss Ltd. File 6055.00

Warning

Article 2 of The Charter of Rights and Freedoms, guarantees me certain fundamental freedoms, to wit, “freedom of...opinion and expression, including freedom of the press and other media of communication “. It has become a perverted policy of the EAB to censor the names and contact information of respondents. Do not censor me and, thereby, violate my Charter freedoms.

Form over Substance

It has also become customary for the EAB to accept rubbish as legitimate environmental analysis. Berger submitted a 170-page document, 90% of which is contained in the “form” of an analysis and only 10% of which can be construed as modestly substantial commentary commensurate with the risks being forced on Manitobans. This is why we must tolerate a report on the emergency response plan at Berger’s Hadashville plant as being, ipso facto, appropriate on Oakwood Road. I expect my public servants to represent Manitobans, not corporations.

Process

Lousy process always yields lousy results. The RM of Springfield (RMS), in a blatant abandonment of democracy, kept the Berger proposal a secret and then modified its definition of agriculture to include peat moss, a natural resource that was “planted” in the Pleistocene epoch, 10,000 years ago. This nonsense enabled Berger to begin developing its Oakwood Road property months before I petitioned the EAB to require an Environment Act Proposal (EAP). This is reprehensible.

Light Pollution

The EAP is silent on light pollution, yet the plant is surrounded by family residences. It has been estimated that 80% of North Americans can no longer see the Milky Way because of light pollution.

Climate Change

Ever heard of this phenomenon? It is conspicuous by its absence from Berger’s 170 pages.

The following comments are referenced to identifiable components of Berger's EAP:

1.2 Corporate Information

Berger is, apparently, a solid, profitable company of long standing. We are told by politicians such as Brian Pallister, and his ilk, that the "economy and the environment go hand in hand." Therefore, it should be no problem for Berger to post substantial bonds to compensate homeowners for damaged wells, polluted water, particulate emissions and so on. Furthermore, Berger should tell us how much they will pay Manitobans in the form of royalties to compensate for permanent loss of non-renewable peat.

No, it is not possible "to harvest and process sphagnum peat moss in a responsible way". Peat moss mining is environmentally bankrupt, especially in southern Manitoba where it filters water destined for Lake Winnipeg and where it holds water in a semi-arid climate. A previous government promised us a "peat strategy". What we got was even more paper pushed hither and yon by uninspired civil servants and clueless politicians.

So, Berger maintains "respect for the environment (incorporating sustainability)" and demonstrates "corporate social responsibility". First, peat moss is not sustainable. Second, no corporation that mines peat moss respects the environment. Third, I wish I had a dime for every gag that I endured upon hearing about "corporate social responsibility".

1.3 Land Use

The treacherous inclusion of "peat moss" in the RMS definition of "agriculture" is positively Trumpian. If the EAB can find a lawyer it must investigate the odour that now accompanies the said definition.

1.5 Public Consultations

Since when do private discussions with the RMS and government "representatives" constitute "public consultations"? Berger is playing fast and loose with its definition of corporate social responsibility, just like the RMS with its definition of agriculture. And Hadashville is irrelevant to an EAP at 22054 Oakwood Road. Wow, even CanWhite Sands (look it up) invoked a virtual public consultation when COVID reared its ugly head. Don't forget that Berger had the time to start well drilling in 2019, long before COVID, but had no time then to undertake real public consultations. (Apparently, Berger has now scheduled a "come and go" consultation in Dugald...2 days before the deadline for public comment. What is this? Somebody's 50th wedding anniversary?)

2.1 Permits Needed

Why are 1000-gallon fuel tanks exempt from licensing? That's a lot of fuel to leak on the ground. I don't suppose that companies would choose to use fuel tanks in 1,000 increments to avoid oversight?

2.2 Schedule and Timeframe

Why is the EAB allowing construction at the site before licensing?

2.4 Chain of Processes

This is a gobsmackingly inadequate description of Berger's presence in an erstwhile pastoral neighbourhood. Berger's brief description seems like whistling past the graveyard. Four million bags of peat and growing media! A massive peat bunker open to the air and constantly disturbed by an endless parade of giant trucks! "Very volatile" peat particles drifting from the site! Ah yes, but it is still "agriculture" is it not? I don't suppose that the EAB would consider chatting with the Municipal Board about this sleight of hand?

2.4.4 Water Inputs and Wastewater

Berger and its hired consultants seem fairly unconcerned about water consumption. Okey dokey, but the license awarded by EAB must include a requirement that the water use be metered and Berger charged for its use. The water is a natural resource owned by Manitobans, and when it is used to generate profit it must be included in Berger's cost of doing business. Berger's assurance about water usage is not good business. Metering is cheap and easy. Manitoba deserves and needs the cash.

2.4.6 Stormwater Management

How effective is a "sedimentation pond" in the winter? Is it bypassed when frozen? Will it be fenced? Will it be inspected regularly?

3.1 Emergency Response Plan

How will the "lake" function as a source of fire-fighting water in winter?

Will sterile fire breaks be created to protect neighbours from grass fires?

Reference to a fire response plan somewhere else is lazy. An environmental assessment must be site specific. This is elementary. Hadashville is irrelevant.

3.3 Atmospheric Environment

A peat bunker without a cover will ensure air pollution regardless of the height of the walls. The bunker must be tarped.

Dominant winds are from the northwest in the winter. In the summer, southern winds dominate.

If dust on facility roads is predicted to be a problem it should be controlled with environmentally safe treatments. Water will settle dust for one day in hot weather. The neighbours deserve better.

A double row of trees, even when they mature 30 years from now will neither prevent the movement of peat particles, nor will it reduce noise pollution. (If trees reduced sound we would not hear the birds.)

3.4 Water Quality

The volume of water consumed by the plant is being used in the context of the Winnipeg Floodway which can be seen from the site. The Floodway damaged the local aquifer forcing nearby residents to drill deeper wells. It is just stupid to introduce a commercial operation into an already compromised aquifer. And I don't give a rat's patoot if the RMS calls it "agriculture".

3.5 Vegetation/Wildlife

What does a “limited natural environment around the site” actually mean? And why should a corporation dedicated to the destruction of unsustainable peat bogs get to make such a value judgement?

3.6 Noise

How is it possible that noise from the plant, which is “expected to be running 24 hours per day at peak operations” can be compared to “typical... agricultural operations currently carried out in the regional area”? Farmers do not drive tractors 24 hours per day. Please don’t treat us like bozos!

Give up the nonsense that trees reduce noise pollution. They do not. Do better research.

3.7 Social Environment

Mixing local employment prospects with the spectre of an enormous increase in vehicle traffic is disingenuous. Thirty employees for 3 shifts, coming and going, is 180 cars at peak production. How “social” is that?

Twenty-five trucks, in and out, is 50 truck trips per day. What size of trucks? Tandem dumps?

But it is nice that Berger will keep in touch.

4.0 Conclusion

Berger concludes that impacts “will be low to non-existent.” Does it mean that the impacts will be non-existent in Saint-Modeste, or on Oakwood Road?

Yours truly,

C. Hugh Arklie, CA (ret.), BA (Env. St.)

CC Shannon Kohler
CC Cordella Friesen
CC Blair McTavish
CC Bruce Gray
CC Rochelle Squires
CC Sarah Guillemard
CC David McLaughlin

[REDACTED]
[REDACTED]
July 22, 2020

Krystal Penner
Environmental Approvals Branch
Climate and Conservation
1007 Century Street
Winnipeg, MB R3H 0W4

Dear Ms. Penner:

Re: Berger Peat Moss Ltd. File 6055.00

This is my second submission on the above abomination. It has been made necessary by a significant contradiction between Berger's Environment Act Proposal (EAP) of June 18, and its "come and go" presentation to Springfield residents on July 21.

In Annex 1 of its EAP, Berger reported that the RMS had (nudge, nudge...wink, wink) included peat moss in its creative definition of "Agricultural Activities". Therefore, no zoning review was technically needed, and residents had no zoning recourse to the RMS council to object to Berger's commercial peat factory.

However, in its publicity presented at the "come and go" Berger used the excuse that the RMS had approved its industrial peat factory as an "Agricultural Support Industry". Please see the attached photo.

There is a world of difference between the official RMS definitions of "Agricultural Activities" and "Agricultural Support Industry".

"Agricultural Activities means a use of land for agricultural purposes. Typical uses include farming, pasturage, agriculture, apiculture, aquaculture, floriculture and horticulture. This Use Class does not include Livestock Operation or Natural Resource Development." (Apparently it now includes peat moss.)

"Agricultural Support Industry means an industry, commercial service or retail business in which the major product or service being bought, sold or processed is intended mainly for, from or by farmers. Typical uses include aerial spraying companies, grain storage including grain elevators, feed mills and seed plants. This Use Class does not include Bulk Storage Facilities or Anhydrous Facilities."

Here are my observations:

1. It is contradictory to include peat moss, a natural resource, in a definition that excludes natural resource development. How can this be defensible to a public relying on zoning legislation to protect their lifestyles and land values? In its EAP, Berger states that it is relying on a new definition produced for it, courtesy of the RMS, specifically for its new factory. Just how democratic is that? In your deliberations this nonsense should count against Berger.
2. However, at the "come and go", Berger's publicity referred to the protection of the definition of "Agricultural Support Industry" which is "an industry, commercial service or retail business in which the major product or service being bought or sold is intended mainly for, from or by

farmers.” Berger’s plant is making mixes for horticulturalists, not farmers. Farmers do not use peat moss mixes to grow fields of grains or vegetables. Horticulturalists use peat moss mixes to grow yard flowers and garden vegetables. “Farming” and “horticulture” are, in fact, included in the RMS definition of “Agricultural Activities”. However, the definition of “Agricultural Support Industry” is clearly limited to farmers and, thereby, excludes horticulturalists.

What did Shakespeare say about the webs that we create? I think he just said that Berger fails on both definitions.

The zoning of Berger’s industrial operation within an agricultural zone as an approved activity or as a support industry stinks. It should default the entire EAP process as tainted and indefensible.

Yours truly,

C. Hugh Arklie, CA (ret.), BA (Env. St.)

PS Don’t censor this letter either.

CC Shannon Kohler
CC Cordella Friesen
CC Blair McTavish
CC Bruce Gray
CC Rochelle Squires
CC Sarah Guillemard
CC David McLaughlin

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Cc: [REDACTED]
Subject: Berger Facility Concerns
Date: July-13-20 10:51:31 AM

Dear Krystal Penner,

I am writing to you with great concern about the large mining, processing, and packaging company, Berger, that is being built on Oakwood Road. They have purchased pre-existing buildings at 22054 Oakwood Road and are now in construction for a large production facility on that same location.

There are many serious concerns that this construction brings to the residents of the RM of Springfield. I have included many in this letter for your review.

The pollution that will be caused by this large facility is not only a health concern for the residents of the RM of Springfield, but also an environmental hazard, including potentially the Provincial Birds Hill Park that is located close by. The impact it will have on nature and wildlife in the area have not been researched and shared with the residents and community members.

The health risks associated with the future operation of the facility on the surrounding residents of Springfield is not researched or confirmed and could thus have grave results in the coming years, results that could cost the community members greatly on their quality of life.

Furthermore, it is a great worry how the water levels and volumes will be affected when the construction comes to fruition. There has been no guarantee that they will remain the same as we currently have in 2020. If Berger constructs large wells of their own it could cause a massive, unrecoverable drain on the water levels of the residents of Springfield and take away the use of our own private wells.

Lorne Hill and Oakwood Road are secondary roads, made entirely of gravel, and will have a minimum of 6,500 semi trucks going through it to deliver the minerals and raw materials to the production facility of Oakwood Road as required for their annual plant production capacity. This brings grave safety concerns for our children and members of the community who use the roads for recreational activities. This is a huge safety concern that should be discussed with the residents of Springfield as it will impact us daily. The noise and road conditions after 6,500 semi trucks are travelling across these roads is significant for those living close the production facility. Because the production facility is planning to operate 24/7 with 3 daily shifts of 30 people in each shift, this means that the lights and noise of the facility will be an ongoing annoyance for the neighbours of the facility and greatly impact our otherwise quiet and peaceful neighbourhood.

Peat moss is a very flammable resource that can burn for many years if ever on fire. This is a serious fire hazard next door to many residential and farm properties. The pollution that this could cause would be massive and impact the wildlife in the area for many years to come.

Any change in zoning from agricultural to business use must be investigated and checked to see if it follows all provincial regulations, in order to build their processing and packaging operation.

No information has been shared by neither Berger or the council of the Rm of Springfield, giving us residents no room to voice our concerns or address them. This lack of communication is a grave matter as any decision they make will impact us directly and potentially negatively. A public hearing is required in order to properly address our concerns and receive information from Berger executives themselves. We, the residents of Springfield, have the right to be fully, and properly informed of all the impacts of such a large production facility built in our community. We have the right to fully understand the traffic, lights, noise, and pollution that comes and leaves the facility before operation even begins.

Mika Sawatzky

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Cc: [REDACTED]
Subject: Berger Facility Production Concerns
Date: July-13-20 11:44:36 AM

Dear Krystal Penner,

I am writing to you with great concern about the large mining, processing, and packaging company, Berger, that is being built on Oakwood Road. They have purchased pre-existing buildings at 22054 Oakwood Road and are now in construction for a large production facility on that same location.

There are many serious concerns that this construction brings to the residents of the RM of Springfield. I have included many in this letter for your review.

The pollution that will be caused by this large facility is not only a health concern for the residents of the RM of Springfield, but also an environmental hazard, including potentially the Provincial Birds Hill Park that is located close by. The impact it will have on nature and wildlife in the area have not been researched and shared with the residents and community members.

The health risks associated with the future operation of the facility on the surrounding residents of Springfield is not researched or confirmed and could thus have grave results in the coming years, results that could cost the community members greatly on their quality of life.

Furthermore, it is a great worry how the water levels and volumes will be affected when the construction comes to fruition. There has been no guarantee that they will remain the same as we currently have in 2020. If Berger constructs large wells of their own it could cause a massive, unrecoverable drain on the water levels of the residents of Springfield and take away the use of our own private wells.

Lorne Hill and Oakwood Road are secondary roads, made entirely of gravel, and will have a minimum of 6,500 semi trucks going through it to deliver the minerals and raw materials to the production facility of Oakwood Road as required for their annual plant production capacity. This brings grave safety concerns for our children and members of the community who use the roads for recreational activities. This is a huge safety concern that should be discussed with the residents of Springfield as it will impact us daily. The noise and road conditions after 6,500 semi trucks are travelling across these roads is significant for those living close the production facility. Because the production facility is planning to operate 24/7 with 3 daily shifts of 30 people in each shift, this means that the lights and noise of the facility will be an ongoing annoyance for the neighbours of the facility and greatly impact our otherwise quiet and peaceful neighbourhood.

Peat moss is a very flammable resource that can burn for many years if ever on fire. This is a serious fire hazard next door to many residential and farm properties. The pollution that this could cause would be massive and impact the wildlife in the area for many years to come.

Any change in zoning from agricultural to business use must be investigated and checked to see if it follows all provincial regulations, in order to build their processing and packaging operation.

No information has been shared by neither Berger or the council of the Rm of Springfield, giving us residents no room to voice our concerns or address them. This lack of

communication is a grave matter as any decision they make will impact us directly and potentially negatively. A public hearing is required in order to properly address our concerns and receive information from Berger executives themselves. We, the residents of Springfield, have the right to be fully, and properly informed of all the impacts of such a large production facility built in our community. We have the right to fully understand the traffic, lights, noise, and pollution that comes and leaves the facility before operation even begins.

Reinhold Sawatzky

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Berger Mixing Plant in Springfield
Date: July-13-20 11:22:10 PM

Dear Ms. Penner,

We only recently were made aware of the plan for the Berger Peat Moss Mixing Plant in Springfield and would like to make you aware of our very serious concerns regarding the negative impact this plant will have on the aquifer and air quality in our community as well as the fact that the plant will operate 24/7 with up to 6500 semi trucks delivering minerals and raw materials to the production plant on Oakwood Road. In addition, the traffic, light and noise pollution from this kind of operation will have a detrimental impact on the residents in the surrounding area and will adversely affect property values.

It is our understanding that the RM of Springfield Council has not followed the rules and regulations required to allow the Berger Mixing Plant to operate in our community. "By Resolution" the RM of Springfield Council appears to have re classed peat moss from a mined mineral under the provincial act to a harvested agricultural product. We don't believe they have the authority to do this without following provincial rules and regulations related to zoning by-laws. A public hearing process is necessary to ensure adequate research and assessment of the impact of the Berger production facility on aquifer, air quality, noise and light pollution, safety, impact on property value and the quality of life in our community.

In your capacity as Pesticide and Agricultural Program Specialist for the Environmental Approvals Branch we would like to ask you to please follow up on our concerns and make sure that provincial guidelines are followed to protect our community and its environment. Thank you for your attention to this matter

Sincerely,
Walt and Terry McKee

[REDACTED]

Sent from my iPad

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Berger Mixing Plant
Date: July-09-20 6:14:09 PM

Hi Krystal,

My name is Michelle Booy and I live on Lorne Hill Rd. I am concerned about the Berger Mixing Plant going on 22054 Oakwood Rd. The public has received little to no information on this and we would like a public hearing and most likely a location change. There is issues with water to the residence, fire safety, and traffic.

Thank you,
Michelle Booy

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Berger mixing plant
Date: July-13-20 5:16:08 PM

Hi

I have only just heard about this. I am very concerned that the zoning bylaws are apparently being circumvented to allow this project to proceed without hearing from the local residents.

John Greenhill

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Berger Mixing Plant
Date: July-14-20 7:59:56 AM

Hello Krystal,

My name is Shannon Hiebert and I am writing you this email with my concerns regarding Berger Mixing Plant on Oakwood Road.

We have lived at 22075 Springfield Road since 2009. We were very happy to move out of the city where things are peaceful and quiet. However, it has been brought to our attention that the Berger Mixing Plant that is not far from our house may actually have a huge negative impact on our quality of life. As residents to the area, we have the right to know of any changes - before they happen that may effect the area we live in.

Our concerns include quality of water...right now our quality of water is very good and we are happy with that. However, with the wells that have to be dug for the new plant, how will that effect our water? Will it be a problem? Is there a chance that our water may be contaminated? Is there a chance that our wells will run dry? If so, who is going to fix that? At whose expense? It shouldn't be ours. Especially if we never even agreed to the plant making so many major changes to our area. Did this company have a proper permit in place before any wells were dug? Or any future wells that may be dug?

We are also wondering about pollution. Air, noise, light. This is our home. We don't our kids and families breathing in unclean air. Would you? This is our home. We want our families to be safe. We want to be able to sleep at night and enjoy the out doors during the day. That's why we moved here. With all the trucks driving back and forth, it may effect our safety, damage our roads. Also it may affect the value of our land.

Was the land that Berger purchased zoned for this kind of operation or was it changed to accommodate a large company with a lot of money?

We need to have some sort of meeting set up to talk and discuss this matter as it effects a lot of people. Rules need to be followed, peoples voices need to be heard and respected. Negative changes like this should not be allowed to happen.

I hope you take this letter into serious consideration and please consider the residents of our area. This was our home first.

Shannon Hiebert [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Thank you for you time.

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Cc: [REDACTED]
Subject: BERGER PEAT MOSS LTD. - HORTICULTURAL MIX PLANT - FILE: 6055.00
Date: July-13-20 8:31:09 PM

Krystal Penner,
Environment Officer
Environmental Approvals Branch
Manitoba Conservation and Climate

I am writing you in regards to the Environment Act Proposal that has been filed by Berger Peat Moss Ltd. for the construction and operation of a peat screening and mixing plant for horticultural growing media located at 22054 Oakwood Road 64 North, on the NW ¼ Section of 23-11-4 EPM, in the Rural Municipality of Springfield, Manitoba.

As a resident in the vicinity of this facility, I am concerned with the potential environmental impact the proposed plant will have on our quality of life regarding production dust, chemical releases, water contamination.

- In Section 3.3. Atmospheric Environment it states: “The Project could have an impact on the atmospheric environment through the release of peat particles in the air. Berger has implemented several mitigation measures on-site in order to limit the amount of dust generated from the operations:”
 - The proposal does indicate processes will be in place to limit the number of particles released, however there is no indication of independent external monitoring, and what will happen if there is an impact on the local environment.
 - What protections will local area landowners have if they are negatively impacted in any way.
- In Section 3.4. Water Quality it states “ The Project could have an effect on water quality through the contamination of the surface water and/or underground aquifer. Please refer to section 3.1.2 for the mitigation measures for hazardous substances as well as the prevention and emergency response for spills. Surface water quality could also be affected by aerial peat particles depositing into open water areas. Thus, mitigation measures discussed in section 3.3 also applies to water quality. Berger also designed, in collaboration with SBC, sedimentation ponds at the end of the drainage system to ensure that any sediment would be retained within the site.”
 - This section really concerns me as it appears there does not appear to be any guarantee that our water will not be affected. While the drawdown tests indicate water quantity will not be affected, there is concern the additional draw may affect the quality of the water. I question why there is no ability to ensure the water quality is not affected?
 - What happens if our water is contaminated requiring either installation of municipal water or installation of local water storage tanks and delivery of this water?
 - Who will be responsible for the additional costs for the alternate source of water?

Has a baseline been established for all wells within the same aquafier that may be impacted by this proposal, so that there will be an ability to identify any changes in the water quality?

- In section 3.7. Social Environment it states: “A significant increase of trucks along the 207 is also expected. At peak operations, an approximate 25 trucks per day will be coming in and out of the plant. Following one of the conditions of the development permit, Berger will enter into an agreement with the RM regarding maintenance and potential upgrade to the roads around the Project. As of now, road upgrades are not expected, but Berger will stay in close contact with the RM of Springfield should any improvements be necessary because of the Project. “
 - Hwy 207 is already a heavily used route for a large number of gravel trucks that deliver supplies from the local area gavel pits to various areas of the province. The highway itself is in poor condition and has not seen any improvements for at least 20 years. Driving the hwy is akin to riding a bucking horse, depending on the load you are hauling. This also results in a significant amount of noise from the empty trailers bouncing along this highway, due to its poor condition. The additional traffic, as indicated in the proposal, will further increase the wear on an already degraded Hwy. In addition, the intersection of Hwy 207 and Oakwood Rd. may potentially become a high collision area due to the large volume of vehicles coming from Oakbank and surrounding area.
 - What will be done to minimize the additional highway noise.
 - How will the intersection, noted above, be modified to ensure safe interaction of passenger vehicles and the additional truck traffic that will occur.

As of today, I am not aware of any consultations, or public hearings that were held to answer these questions. I find it surprising, in this day and age, there has not been more transparency in the establishment/approval of this facility for those of us that may potentially be negatively impacted.

I am requesting approval of this proposal be deferred until all questions/issues have been resolved to the satisfaction of all those that may be impacted by this project.

Respectfully

John Moehring

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

Email: [REDACTED]
Cell: [REDACTED]

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Berger Peat Moss Ltd.
Date: July-23-20 1:16:36 AM
Attachments: [BergerPeatLtrWFPhae.pdf](#)

[REDACTED]
[REDACTED]
July 23, 2020

Krystal Penner
Environment Officer
Krystal.Penner@gov.mb.ca

Signed paper copy mailed to: Environmental Approvals Branch
Manitoba Conservation and Climate
1007 Century Street Winnipeg MB R3H 0W4

Re: Berger Peat Moss Ltd. - Horticultural Mix Plan - File: 6055.00

Further to my e-mail letter to you dated July 6, 2020, I attended the Berger Peat presentation last evening at the Dugald Community Centre which was advertised as a come and go, and at the 11th hour, so to speak, not a 2 hour presentation and Q and A session. The company spent 2/3 of the time trying to convince residents of Springfield that their company is a responsible, cooperative, and caring corporate entity when their entire process into the purchase and preparation of the facility on Oakwood has been cloaked in secrecy since early in 2019. Attached is my letter published in Letters to the Editor of the Winnipeg Free Press in June 2019 as proof that this initiative was in the works fully a year ago and no effort to advise the public was made. To suggest that only now, just before the COVID 19 lockdown, the company had planned a public "presentation of the Project combined with a job-fair in the town of Oakbank closest to the project in the spring of 2020, but this activity was rescheduled until the situation related to COVID-19 is better suited for such an event" is duplicitous as is their statement their company maintains "respect for the environment (incorporating sustainability) and demonstrating corporate social responsibility".

When I initiated an investigation through the Provincial Department of Agriculture in 2019, they were completely unaware of this supposed reclassification of peat, so that would suggest that Berger, who purchased the property early in 2019 had not spoken to any government department prior to the purchase. Did they not do their due diligence and check into the zoning of the property or had they already negotiated a secret agreement with the municipal council of Springfield? Our Council shares responsibility in not publicizing Berger's plans to the public they supposedly serve the minute they became aware of the plant.

Simply because the RM of Springfield Council passed a unanimous resolution agreeing to the recent reclassification of peat moss by the Manitoba government as an agricultural product does not alter the facts: 1) Peat moss is considered a mineral. 2) The Manitoba Government did not reclassify peat moss. For Berger Peat to justify their actions by stating "peat moss is a defined activity approved by the RM of Springfield (Annex 1), thus granted the Project the status of "permitted use" is unconscionable as they full well know the Council of the RM of Springfield have passed two resolutions that have no basis in fact, the second of which defines peat moss as an agricultural activity. "7 Definition of Agricultural Activities Resolution No: 19-195 Moved By: Howard Bredin Seconded By: Rick Wilson BE IT RESOLVED THAT the definition of agricultural activities within the Springfield Zoning By-law be amended to include peat moss." In fact, peat moss is not an activity, only the mining and processing of it.

To try and convince the audience that "1.5 million bags of loose peat (6 cubic feet compressed to a factor $\frac{1}{2}$, roughly equivalent to 510,000 m³) and 2.5 million bags of growing media (4 cubic feet compressed to a factor $\frac{1}{2}$, roughly equivalent to 570,000 m³) is going to be used to grow vegetables and other produce in large beds of peat moss prepared from product sold in plastic wrap is completely ludicrous. Are those giant greenhouses shown in their presentation with the row upon row of beds containing vegetables such as lettuce prepared by manpower ripping open countless bags of 4 cubic feet or 6 cubic feet containing some type of peat product? No amount of donuts could convince residents of Springfield the truth of that! (Note that no donuts were consumed during the 2 hour presentation by the audience as far as I was able to observe.)

In conclusion, Berger Peat has proven beyond a shadow of doubt that they are anything but a caring, cooperative, and responsible corporate entity as proven by the surreptitious manner in which they proceeded to place their processing plant, a commercial/industrial activity, on land they well knew was zoned agricultural. For our Council to enable them to do so in spite of what they knew would be objections from local residents of Springfield when they have plenty of properties that are correctly zoned Industrial/Commercial or whatever they now term such properties, I believe Employment Lands or some such innocuous title, proves our elected representatives do not have the best interests of the ratepayers at heart but rather are promoting unwanted industries on relatively inexpensive agricultural land regardless of the impact on our drinking water and environment.

Yours sincerely

Heather A. Erickson

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Berger Peat Moss Ltd
Date: July-15-20 11:18:25 PM

Dear Krystal,

In regards to the Berger Peat Moss Ltd., our concerns are primarily regarding the ground water contamination and any negative impact to our well's ability to draw fresh water for my family's needs. I may be incorrect, but I understand the aquifer runs from Anola in the East to East St. Pall in the West. Whether our home is in the flow path or not, i'm concerned with the acknowledgment in the proposal that ground water contamination is possible.

A second concern is the wear on the road. The extra heavy traffic will cause the roads to deteriorate. This will put more stress on our vehicles and add additional costs for repair. There is also the noise pollution with the use of engine retard brakes at the intersection near our home at Hwy15 and Pr 207.

This may not be your department, but I question if this manufacturing plant can be built on an area zoned for agriculture when it would appear to me as commercial. Is there a reason the RM wants to avoid a public hearing?

Thank you for your time
Darryl Brown

Sent from my Samsung Galaxy smartphone.

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Cc: [REDACTED]
Subject: Berger Peat Moss plant
Date: July-15-20 2:28:33 PM

emails to: Krystal PENNER, Glen FUHL, Ron SCHULAR, Ted FALK, Allan AKINS

This email is to notify you that the municipality has over stepped their mandate by using a "resolution in council" to amend a provincial statute.

I live exactly 1 mile north of the proposed plant and am very concerned about noise, air and water pollution.

A few years back, a business attempted to open a particle board manufacturing plant which was not accepted by the community as industrial use is not a permitted use for this area. That operation would have put micro particles in the surrounding air, thereby causing a local health hazard. I have the same concerns regarding this industrial operation.

Looking at the other Berger plant operations there are open, outdoor drying areas. This would lead to particles being air born and therefore blowing about the area. Not what residents moved to this area for. This is farm/residential not industrial land.

One main concern is the use of water. We have excellent water here. We drink the water straight from the well without filtering. Again from watching the videos of many peat moss plants, not just Bergers, it is noted that there is a very high volume of water usage. This surely must affect the water tables. Would our water table in this area bring in unsuitable water into our water table?

Other areas of concern include;

- noise, with 24/7 operation it means that large loaders will be in the outside yards working at night. That noise carries for miles, especially at night. Local gravel operators do not operate at night nor on Sundays.

- Traffic on Lorne Hill road must not be permitted neither by workers nor semi-trucks. Traffic on Hwy 207 is already heavily used by semi-trucks. This highway is already very rough from their use.

I conclude that this matter requires much more perusal before permits are permitted.

Regards

Gerry PARENT and Joan Parent

[REDACTED]
[REDACTED]

Ph: 2 [REDACTED] Cel: [REDACTED]

[REDACTED]

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Berger peat moss production facility at 22054 Oakwood rd in the RM of Springfield.
Date: July-15-20 11:39:59 AM

This in regards to the Berger peat moss production facility at 22054 Oakwood rd in the RM of Springfield.

It has been brought to my attention that the company started development prior to the RM issuing a building permit. The RM has apparently granted a building permit after the fact but prior to a provincial environment review. It also appears that the council has re-classified peat moss from a mined mineral under the provincial act to a harvested agricultural product. This seems irregular, I am questioning if there was any undue influence that encourage council to behave in a questionable manner.

I do encourage public hearing so that residents can address several issues:

1. Land property values may be adversely affected.
2. Well water quality and volume must be guaranteed.
3. Traffic safety, the number of trucks places additional risk on residents.
4. This is a quiet agricultural community that can be adversely affected by noise from a commercial enterprise.
5. Pollution and negative impact on environment. Peat moss is located in Eastern Manitoba, the packaging should be located close to source. This way we are not adding additional pollution in the transport of loose peat moss. Berger already has a plant located in Hadashville, a much more appropriate location. This reduces transportation costs as compressed packed peat moss is a 2 to 1 ratio? Rural communities need much more support than locations close to Winnipeg.

Sincerely,

Lawrence Skrypetz
Resident close to location

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Berger Peat Plant - RM of Springfield
Date: July-16-20 11:51:41 PM
Attachments: [2020_06_18_eap_berger_peat_moss_ltd_6055.00_jt_comments_reduced.pdf](#)

Good evening Ms. Penner,

I'm responding to the Notice of Environment Act Proposal related to the proposed Berger Peat Moss Ltd. – Horticultural Mix Plant. I have attached a copy of Berger's "Springfield Mixing Plant Development Project – Environmental Act Proposal for Bulk Material Handling Facility" dated June 2020 which contain my comments. Note that the document's size has been reduced by removing some of the drawings, figures, and appendices. The following is a summary of those comments:

- A proper public consultation process has not been afforded the residents living near the proposed peat plant. Residents deserve the right to ask questions and voice their concerns in some type of public forum. The Proponent didn't acquire the property and decide to build the peat plant in the last month and this Project has probably been in the works for some time. Having public consultations after you've drilled test wells and started construction is simply bad form. I understand that that no public consultation may be required because the land use hasn't changed, however, this may a point of contention for some nearby residents.
- The Proponent has indicated that the Project could contaminate the Carbonate Aquifer but that it has mitigation measures in place for hazardous substances. These mitigation measures don't appear to be mitigation measures but rather a description of how hazardous substances are to be stored. The Carbonate Aquifer is a precious resource and any risk of contamination should have suitable and detailed mitigation measures in place and not simply how hazardous substances plan to be stored.
- The process of acquiring the peat appears to fall into the category of mining yet the RM of Springfield has chosen to consider the Project an agricultural activity. This Project is analogous to the removal of rock or gravel from a quarry or borrow area and then transporting it somewhere else to be processed except that the processing of rock or gravel is cleaner and less risky.
- Is there some certainty that in dry period (several years), the pumping from the Carbonate Aquifer for the peat plant won't adversely impact nearby wells?

Best regards,

Jeff Tutkaluk

Darryl Speer

[REDACTED]

[REDACTED]

e-mail: [REDACTED]

July 16, 2020

Krystal Penner, Environment Officer
Environment Approvals Branch
Manitoba Conservation and Climate
1007 Century Street
Winnipeg, MB. R3H 0W4

Re: Berger Peat Moss LTD.-Horticultural Mix Plant-File:6055.00

Attention: Ms Penner

I wish to register my opposition to the proposed Berger Mix Plant. This is not a permitted use on the land zoned as Agricultural as this is a large industrial complex that manufactures peat moss mixes for market.

The RM of Springfield Council following a closed meeting March 28, 2019, chose to bypass due process with Resolution#119-155,"Be it resolved that the RM of Springfield agrees with the recent reclassification of peat moss by the Manitoba Government as an agricultural product". The Province confirmed that peat moss was NOT reclassified but remains classed as a mineral. Following another closed meeting April 25, 2019, Council doubled down with Resolution#19-195,"Be it resolved that the definition of agricultural activities within the Springfield Zoning By-Law be amended to include peat moss". Council was requested to rescind these resolutions June 10, 2019, they chose to not respond.

Both resolutions were passed to facilitate the repurposing of the equestrian property Berger's had just purchased zoned agricultural to a peat processing plant-there by avoiding the required public hearings and rezoning for industrial use. Rate payers especially those adjacent to this proposed plant were totally shut out of the process. Further Berger has proceeded with the construction of their operation prior to applying and receiving their Environmental approvals-some perceive as 'strong arming' the process.

I would request that the first order of business is registering a 'stop order' on Berger as they and RM officials have shown a complete disregard for the proper conduct of this project. I would request that you deny this application for these reasons:

A) It lacks clear science based guide lines for the management of:

- 1) Dust controls(open bunker for intake of raw peat?).
- 2) Fire risks(dust concentrations, finished product bulk storage?).
- 3) Water uptake requirements long term effects on the aquifer.
- 4) Heavy traffic for transporting raw peat in(500,000m3) and finished product out(4.0m bales)

annually.

- 5)Lack of clarity on dealing with the proper handling/disposal of hazardous waste process water.

B) Breach of trust-Berger and the RM of Springfield chose to negotiate in secret to set aside Provincial land use regulations to the detriment of rate payers. There is now NO confidence that no matter how stringent the guidelines that are stipulated for this plant-neither Berger or RM officials will be

committed to compliance.

C) Since April 2019 there was ample opportunity for Berger and Council to be transparent and accountable as per their stated values to provide media releases and host open forums on a development of this magnitude. The only official public information that has surfaced to date was the small notice of the Berger Environment Act Proposal in the June 25, 2020 issue of the local paper. This speaks volumes about how little regard Council and Berger have for those they claim to hold in high regard. Instead the COVID card is now being played to justify their veil of secrecy.

It is a sad day indeed when concerned citizens have to deal with malfeasance on the part of their RM officials and those who would do business in Springfield.

I would ask that you carefully consider all the objections you are receiving and deny Berger's application File: 6055.00.

I thank you for your considerations on all matters bearing on this file.

Yours sincerely,

Darryl Speer

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Berger Production Facility on Oakwood Rd, Springfield, MB
Date: July-10-20 5:40:20 AM

I am contacting you to express my concerns with respect to this new production facility planned for my area. I have grave concerns about the impact of the water supply as well as the increased heavy equipment traffic in the area.

I believe a public hearing must be held in order before any construction is given approval.

Respectfully;

Ken Williams

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Berger Springfield Mixing Plant Development Project
Date: July-14-20 12:38:12 PM

Good After Ms. Penner!

It was brought to my attention by a neighbour that Berger has purchased and is currently in the process of constructing a Peat Mixing Plant on Oakwood Road in our area. This is the first time that I have become aware of this and I am contacting you with concerns that I have in regard to a large industrial type of business being allowed in an area which is zoned to be a residential/agricultural area. I can foresee potentially a variety of issues that could affect the quality of life that we as residents enjoy and the potential impact on our property values. My concerns are as follows:

Environment

The Project could have an impact on the environment through the release of peat particles in the air. Peat particles are very volatile and highly flammable. If dust particles were to be released into the air and/or a fire were to occur the potential for **serious health concerns** exists. In addition to that the harm done by carbon emissions released into the air. These statements and concerns were raised several times throughout the report. Another fire concern seems to be the release of methane gases from existing landfill/transfer stations in the area. To quote "it is HLC's opinion that former and present landfills and dump sites are **not likely** to give rise to potential impacts in connection with the Site". The fact that they say '**not likely**' doesn't give me an assurance that it could not be a problem.

Water Quality/Water Usage/Wastewater Management

How will this potentially affect the wells of residents in the surrounding areas? The amount of water required by the industry, spills, industrial waste from the mix plant (cleaning of the tanks), additional septic field plus potentially enlarging two existing fields.

Friesen Drillers reports states It should be noted that **groundwater quality may change over time**". 2.4.4. Water Inputs..."capacity of 2 new wells is **likely sufficient** to support groundwater pumping " "The projected groundwater level fluctuations resulting from operation of the new water supply are expected to be less than natural seasonal and climatic fluctuations." "The Project **could have an effect on water quality** through the contamination of the surface water and/or underground aquifer. Friesen Drillers....recommendations. "Complete a longer term (4-8 hr) pumping test to assess the overall system capabilities. During the pump test, groundwater levels would be monitored both manually and with automatic pressure sensing transducers in nearby wells." "There are several potential sources of spill contaminant for the project, either from the leeching of the any chemical additives, the mishandling of hazardous substances or a malfunction from either an equipment or the fuel tanks themselves."

All of these statements identify potential water quality and quantity issues and cause me a great deal of concern.

Noise

I think it goes without saying that a 24/7 operation in addition to all this truck traffic is going to create a lot of noise in our peaceful neighbourhoods. This is one of the reasons why we live in a rural area.

Property Values

Lastly, I believe that the introduction of this type of business into our neighbourhood will affect our property values. How is an industry of this type allowed to conduct business in an area zoned as Agricultural.

I think a public hearing should be set to allow residents to voice their concerns and get further information on this project.

Linda Kisil

[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Berger
Date: July-13-20 1:34:35 PM

Hi Krystal,

My husband and I are very concerned about Berger moving into our area. We have lived in Springfield going on 40 years now. We are worried about our well water quality. The aquifer could be easily contaminated or run dry. We have not heard anything about this from the municipality of Springfield. I rely on the well water for my horses as well. We are also concerned about the increase in traffic to an already congested highway. I feel like this is being rushed through and our concerns are going unheard. We are hoping that you will listen to our concerns.

Thank-you
Peg Thom

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Berger
Date: July-16-20 2:46:54 PM

Unfortunately, I have an incorrect phone number for you.

Would you please forward your phone number or call me back on my cell.

Thank you

Gerry PARENT CFP, CLU, CHFC TEP

[REDACTED]

Ph: [REDACTED] Cel: [REDACTED]

[REDACTED]

July 23, 2020

Krystal Penner, Environment Officer
Environment Approvals Branch
1007 Century Street
Winnipeg, MB R3H 0W4

Re: Berger Peat Moss File: 6055.00

Attn: Ms Penner

I have just learned that Berger has revised their proposal item 1.4 Land Use with further inaccurate and misleading information.

Peat moss has NOT been reclassified by the Manitoba Government as an agricultural product-Peat is mined and classed under RM Zoning By-Law NO: 08-01 under 7.6 Natural Resource Development(3) the "removal, extraction, washing, crushing, mixing ... in this class includes..peat moss"

Berger's proposed "Mix Plant" is merely processing this natural resource for markets and does not conform to the definition as an Agriculture Support Industry as "intended mainly for, from or by farmers" RM Zoning By-Law 7.5(7).

Further this Berger Plant is non compliant with the current Planning Act 106(1)(b);

- 1) it is not compatible with the general nature of the surrounding area.
- 2) it will be detrimental to people and properties in the surrounding area.
- 3) it does not conform to the current zoning.

Please add these comments to my previous submission.

I thanks you for your assistance,

Darryl Speer

Comments on EAP for Berger Springfield Mixing Plant Development Project

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former member of the Canadian Society of Safety Engineering

July 8, 2020

The Berger EAP is representative of a systemic problem in environmental review in Manitoba. The EAP is superficial and inadequate in many areas. There is obvious proponent bias and omissions with potential serious repercussions. Public presentations and meetings have not been held. There is no comprehensive governmental or independent expertise applied to the oversight of this Project. There appears to be an ongoing and pervasive problem in the review of major projects and the implementation of regulated safeguards such as mine closure plans that are putting environment and the public at risk of serious harm.
<https://www.gov.mb.ca/sd/eal/registries/6055berger/index.html>

As far as the Springfield Municipality, the detrimental consequences of this Project not properly addressed include plant truck traffic, water withdrawal from two high capacity wells, dust generation, and fire risk. The fire potential hazard has not been examined by experts in fire prevention and plant design to mitigate fire risk. There is a very real danger of a potential massive inferno that would require immediate evacuation due to a deadly smoke plume.

Serious problems related to workplace health and safety are not properly addressed.

The environmental consequences of waste water disposal and leakage prevention are not adequately assessed. The aqua-gro fertilizer additive containing a known endocrine disrupter ethoxylated alkyl phenol should not be allowed.

Truck traffic

The peat will be transported between May and October from the harvesting site near Hadashville. The truck route is not documented. The route will likely be on the TransCanada to Deacon's Corner and then north on Highway 207. Alternatively the perimeter highway could be used then east on highway 15 and north on highway 207. Large volumes of vermiculite, perlite, wood fibre and chemical inputs must also be trucked in. The truck traffic on highway 207 will be of particular local concern. The size and configuration of the trucks is not documented. Figures 1 and 2 illustrate some trucks that are used to haul peat.



Figure 1. Peat haul truck <https://peatlands.org/assets/uploads/2019/06/ipc2008p126-129-moyles-the-corrib-gas-project.pdf>



Figure 2. Sealed Lid End Dump truck for hauling peat <http://cornerstonetransport.ca/services/#tab-f97f840907a6890d239>

Peat dust is a concern in haulage. In section 3.3 the report states, “*Trucks used to haul peat from the Project site to the packaging plant will be covered with a tarp to limit dust and debris during transport.*” The sealed

lid truck shown in Figure 3 would be a better option to minimize road hazard from dust. There is inadequate discussion of the trucking requirements or the road hazards associated with hauling peat.

The EAP states,

“At peak operations, up to 500,000 m³ should be hauled each year from the harvesting sites to the plant.”

End dump trucks typically carry a volume of 10 to 20 cubic meters. Using 20 cubic meters 25,000 truck loads are required over about 180 days to move 500,000 m³ of peat. 138 trucks a day would be required. Over an 18 hour period that would be nearly 8 trucks per hour. Is this not a concern in terms of traffic accidents, road congestion, nuisance to local residents and road maintenance? This volume of trucks covered only by a tarp could present a very real road hazard problem. There will be almost certainly injury and death associated with this volume of continuous truck traffic. The truck traffic issue should be fully discussed in the EAP.

GHG

The large volume of truck traffic will generate significant quantities of greenhouse gas emissions that should be quantified. Consideration should be given to using battery driven haul trucks that could be charged overnight at the facility. Plant operations that will also generate greenhouse gases should be quantified.

Peat Unloading and Handling

The EAP states,

“The loose peat will be loaded on truck, transported to the plant and discharged into a peat bunker near the uppers for loose peat. The peat bunker will consist of a concrete slab of 150' X 170', large enough to adequately store the loose peat. The slab will also be surrounded on all sides by a 16 feet concrete wall, allowing just enough space for the trucks to actually discharge the peat within the bunker. Peat particles being very volatile, this wall will limit the propagation of those particles in the atmosphere”

The method on unloading into a bunker described in the EAP will generate huge amounts of dust that will escape into the nearby area. The bunker does not appear to be covered so that dust emission would be continuous. In rains the peat would absorb moisture. Peat is very hygroscopic. Wet peat will generate methane that is flammable. <https://aem.asm.org/content/84/3/e02218-17>. Dry peat is also very flammable. This description does not appear to be operationally feasible without a cover.

Figure 3 illustrates a well developed method for unloading dust generating agricultural material into a silo or elevator.



Figure 3. Truck unloading to minimize dust <https://thumbs.dreamstime.com/z/truck-unloading-grain-elevator-corn-silo-68796190.jpg>

Why would not a dust mitigating well-developed silo method, be used to unloaded and store the peat?

Water

Two fairly high capacity wells of 80 US gallons per minute will be drilled onsite. According to the EAP the total annual allocation would not exceed 100 dam³ per year. A drawdown cone was modelled for the well for 226 days. At half a mile the drawdown was 0.6 feet. This calculation was done in isolation. The drawdown cone will continue to expand as time goes on if the well is continually pumped with no time for recharge.

There was no input from Manitoba Water Stewardship as to the sustainability of the well draw in this area. The municipality did not evaluate the sustainability. Figure 4 shows an area of groundwater vulnerability from a study carried out in Springfield. The Berger wells are being drilled in the Day area that is earmarked for aquifer capacity assessment. No such assessment was done. Figure 5 shows the location of licensed water wells in Springfield. At the very least the capacity of other approximately 15 licensed wells in the Day area illustrated in Figure 5 should have been identified and included in the drawdown study. Figure 6 shows the licensed users in the Springfield area. One licence for industrial-mining has a very large allotment of 4070 dam³ per year. The location of the wells associated with the licences and the water withdrawal of each well is not revealed. This information should have been included in a study of the impact of the new wells for the Berger Plant. Without this detailed information an independent assessment of the hydro-geological effects on the aquifer cannot be done. This information affects the public and has been obtained through public funds. The information should be publically accessible. There is a lack of regional consideration of aquifer sustainability. Large capacity wells cannot be continually added and treated in isolation. This lack of responsibility in aquifer management will lead to overuse that will affect all residents and industries in southeast Manitoba that depend on the carbonate aquifer. There is a systemic abdication of responsibility for water management at all levels, municipal, provincial and in the EAP process itself.

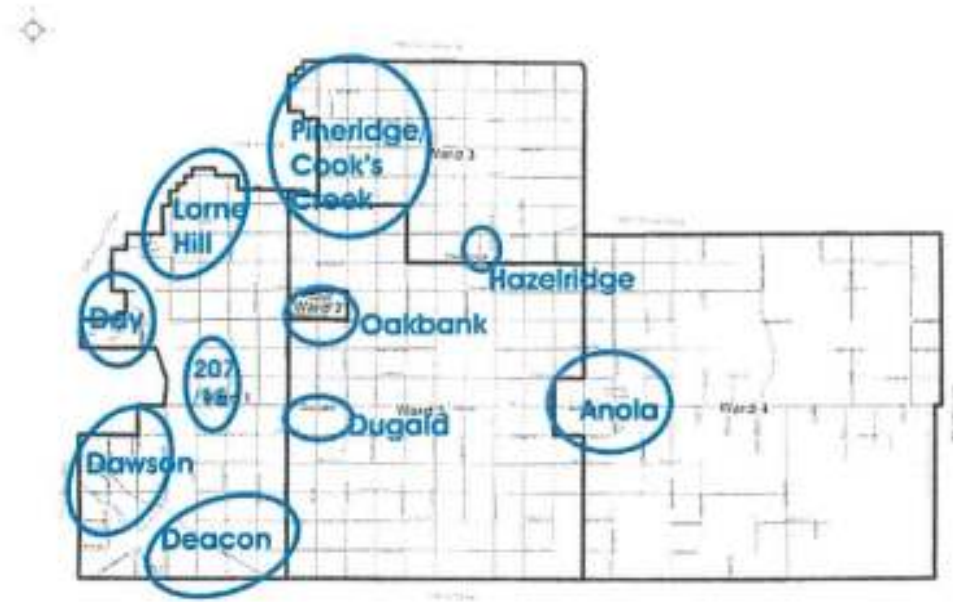


Figure 26 – Ten areas specified for aquifer capacity assessment. (RM of Springfield, 2017)

Figure 4. Aquifer Vulnerable Areas from Aquifer Capability and Groundwater Vulnerability in the Rural Municipality of Springfield by Friesen Drillers 2019 03112020131730 aquifer study.pdf



Figure 25 – License water user locations in the RM of Springfield region. (source – MSD-WUL, 2017).

Figure 5. Locations of License Water Wells in Springfield from Aquifer Capability and Groundwater Vulnerability in the Rural Municipality of Springfield by Friesen Drillers 2019 03112020131730 aquifer study.pdf

| Table 4 Water Use Licenses – Groundwater Users RM of Springfield, Manitoba | | |
|---|---------------------------|--|
| License Category | Number of Licenses | Annual Allotment (dam³/year) |
| Industrial-mining | 1 | 4070.00 |
| Heat/Cool | 4 | 3508.00 |
| Other Industrial | 1 | 1100.00 |
| Municipal | 5 | 750.30 |
| Irrigation | 5 | 380.59 |
| Other | 3 | 272.00 |
| Agricultural | 3 | 99.60 |
| Domestic | 1 | 7.40 |
| Fire Fighting | 3 | 3.42 |
| Total | 26 | 10191.3 |

Table 4 – Licensed groundwater users within the RM of Springfield. (source – MSD-WUL, 2017)

Figure 6. Water User Licences in Springfield reproduced from Aquifer Capability and Groundwater Vulnerability in the Rural Municipality of Springfield by Friesen Drillers 2019 (03112020131730 aquifer study.pdf)

Workplace Health and Safety

The workplace health and safety issues are manifest and inadequately dealt with in this EAP. The section on Workplace Health and Safety is replete with non specific generic platitudes. There will likely be exposure within the plant site to high levels of dust from the vermiculite, perlite and peat. The NIOSH maximum allowed levels of exposure to this dust is 15 mg/m³. <https://www.cdc.gov/niosh/pel88/perlite.html>. Fortunately this dust is not known to cause silicosis. There is no mention in the EAP of a dust level limit or requirements for measurement of the dust levels. Dust can often be mitigated by adequate ventilation. The ventilation requirements in terms of health and safety are not discussed.

Of greater concern is exposure to lime dust. Calcium or dolomitic lime will be stored in silos. There is no description of the potential operational exposure of workers to lime. The material safety sheet for dolomitic lime requires the use of respiratory protection. <https://www.targetproducts.com/PDFs/SDS-Hydrated-Dolomitic-Lime.pdf>. Lime can cause skin burns and respiratory distress and lung damage from the caustic effect. Vague assurances are made in the EAP about the use of personnel protective equipment when necessary with no specifics.

Also of concern is exposure to airborne magnesium nitrate hexahydrate which is considered a hazardous substance according to OSHA 29 CFR 1910.1200 (from Santa Cruz Biotechnology scbt data base <http://datasheets.scbt.com/sc-203127.pdf>) Long term exposure to high dust concentrations may cause

changes in lung function i.e. pneumoconiosis; caused by particles less than 0.5 micron penetrating and remaining in the lung. OSHA permissible level of exposure is 5 mg/m³.

The information from the scbt data sheet on magnesium nitrate contradicts the safety data sheet in the Berger EAP. The safety data sheet states magnific water soluble magnesium nitrate is not a hazardous substance.

In the past vermiculite from Libby Montana and elsewhere contained asbestos.

<https://www.asbestos.com/news/2018/04/24/tool-vermiculite-asbestos/>. This should not be the case now however the potential the asbestos hazard should be acknowledged and discussed. There should be verified analysis that the vermiculite used for this Project contains no asbestos.

Fire

Peat dust is extremely flammable as is wood fibre. A fire destroyed the peat packaging plant in Giroux Manitoba in 2005. <http://www.manitoba.ca/iem/geo/mgstracker/images/region6/PRES2011-13.pdf>. The EAP does discuss the flammability hazard however mitigation measures are not properly documented. For instance ventilation that can mitigate the dust levels is not discussed. A sprinkler system or other fire suppression mechanisms are not evaluated. Sources of ignition are not discussed or identified. A fire safety plan at Hadashville is described in lieu of a plan for this site. A “potential” emergency response map is included that is totally inadequate. What serious EAP would present an evacuation plan at an entirely different location and facility and a “potential” emergency response map? The fire safety plan should be fully developed for this site and subject to fire safety experts for approval. The plant illustrations of the internal structure show many levels with narrow access ways that would impede emergency evacuation. A pump and hoses will be installed at an onsite water body to supply water for a fire. There is no independent review of the adequacy of this source of water for fire protection. The plant design should be reviewed by independent fire safety experts. If a fire started a massive fireball with an extensive deadly smoke plume could result that would require immediate evacuation. A proper evacuation plan must be developed for the pant personnel, nearby residents and road traffic.

Industrial Waste Water

The EAP states,

“Berger has a cleaning plan for the tanks that occurs three times per week. Berger uses a mixture of vinegar and water to clean the tanks. This results in an expected volume of 750 L/week or 200 L/day and a peak day flow of 500L/day of industrial wastewater being generated. The composition of the industrial waste is characterized later in this letter. It has been determined that this wastewater can not be treated on site.”

The industrial wastewater will be stored in a fibreglass tank. The EAP sates, “Berger plans to establish an agreement with the North End Sewage Treatment Plant or other Class II sewage treatment facility” for disposal. The disposal plan is at this point in time merely conjecture. Once again there is unfinished inadequate information in the EAP.

The EAP sates incorrectly the contents of the wastewater are given in annex 4. Once again there is incomplete misleading information.

In annex 3 aqua-gro is given as a fertilizer input. Aqua-gro contains 80% ethoxylated alkyl phenols <https://www.tlhort.com/images/files/label/3583900.pdf>

A peer reviewed paper in the Polish Journal of Veterinary Sciences, 2016, titled, Alkylphenol ethoxylates and alkylphenols – update information on occurrence, fate and toxicity in aquatic environment by Kovarova J., Blahova J., Divisova L., and Svobodova Z. states,

“It has been well established that they have endocrine disruption activity, hepatotoxic, genotoxic and other negative effects on animal and human health. In spite of the effort to reduce their use, they persist in the environment not only in industrial but also in remote regions.”

<http://yadda.icm.edu.pl/yadda/element/bwmeta1.element.agro-7d45a44f-efc7-47e2-83dc-46f199f6d290>

This toxic wastewater is so hazardous it should be stored in a double walled tank with leak detection. All piping to the tank should be double walled with leak detection. Strict volume records should be kept of inputs withdrawals and tank levels to maintain a volume inventory record. The ultimate fate of the wastewater components should be part of the EAP especially the environmentally persistent endocrine disruptive, hepatotoxic, and genotoxic ethoxylated alkyl phenols. To simply ignore the issue by transferring the problem to an industrial waste disposal in the City of Winnipeg is negligent.

Calcium and magnesium nitrate in the waste water is also a concern. Nitrates have a high water solubility and consequent high environmental mobility in soil and water. Nitrate can contaminate groundwater to unacceptable levels. <http://datasheets.scbt.com/sc-203127.pdf>

The aqua-gro will be mixed with the peat product. Wherever the peat is used the persistent toxin ethoxylated alkyl phenol will leach into the environment. The failure to identify the use of ethoxylated alkyl phenol in the EAP is another example of proponent omission of an important issue. The aqua-gro additive should not be allowed.

Public Consultation and Approvals process

The EAP states,

“Berger has already had several exchanges with representatives of the RM of Springfield, Conservation and Climate, Agriculture and Resource Development and other departments of Manitoba government. Berger was also planning to do a presentation of the Project combined with a job-fair in the town of Oakbank closest to the project in the spring of 2020, but this activity was rescheduled until the situation related to COVID-19 is better suited for such an event.”

The public review process ends on July 16. No meeting was held with the public before the review process began. The planned public presentation by Berger if it occurs will be too late to allow effective participation in the review process that has already begun. It almost seems that meaningful thorough review of this Project is being intentionally discouraged and kept from independent public review and scrutiny. There has been no indication that a technical advisory committee (TAC) of government experts will analyze and comment on this Project. There is no independent technical expertise outside of government applied to this Project.

What is even more peculiar that many of the actions recommended in the public review of the original proposal for the Hadashville peat mine in 2001 do not appear to be fully implemented or enforced. <https://www.gov.mb.ca/sd/eal/registries/4673bergerstlabre/Summary.pdf> Of particular concern is the apparent failure to file a mine closure plan and provide financial security in accordance with mine closure regulation 67/99 before commencement of mining. The Manitoba mines and Minerals Act <https://web2.gov.mb.ca/laws/statutes/ccsm/m162e.php> states,

“Filings before commencement of work

74(2)

Subject to subsections (3) and (4), a holder of a claim shall not commence or recommence work on an advanced exploration project until

(a) the holder files with the director

(i) written notice of the intended date of commencement or recommencement of the work, and

(ii) a closure plan prepared in accordance with the regulations; and

(b) the director approves the closure plan and accepts the security provided with the plan for the performance of rehabilitation.”

The licence for the Berger Peat mine updated in 2019 states,

“43. The Licencee shall: a) until such time that a Peatland Recovery Plan is approved pursuant to the Peat Harvesting Licence no. 15 pursuant to The Peatlands Stewardship Act, comply with the Mine Closure Regulation 67/99, or any future amendment thereof”

The Peatland Recovery plan and therefore the Mine Closure Plan are not approved. It may be that the plans have never been filed. Certainly a Peatland Recovery Plan and Mine Closure Plan were not approved at the time of receipt of the proposal in 2001. Eighteen years, later at the time the updated licence was issued, the closure plans were still not approved. There is no mention of a financial security in the updated 2019 licence. It is likely no financial security has been approved and received.

The failure to submit a mine closure plan before receipt of a licence appears to be a systemic issue with the approvals process. The mine closure plan for the CPS Wanipigow Sand Project was not submitted prior to issuance of the licence. <https://www.gov.mb.ca/sd/eal/registries/5991wanipigow/index.html>. The mine closure plan for Wanipigow is a requirement of the licence under condition 97 which states,

“97. The Licencee shall:

b) comply with Manitoba Regulation 67/99, or any future amendment thereto, issued under The Mines and Minerals Act, respecting closure plans for mining”

There seems to be a consistent policy of the Approvals Branch to make the mine closure plan a condition of the licence rather than a requirement prior to receipt of the licence and commencement of mining.

It appears the Berger Peat Mine is in violation of the Manitoba Mines and Minerals Act regarding submission of a mine closure plan. Should not the entire operation including the approvals for a mixing facility in Springfield be suspended until the licence and Act requirements for closure are met?

The Mine Closure Plan and receipt of financial security and should be completed before the approvals process and submitted for public review as part of the approvals process. Without financial security a bankrupt company can leave an unfunded environmental liability that must ultimately be born by the public.

Summary

The EAP is incomplete and inadequate. Many serious hazards that involve worker and public harm are ignored. The large volume of truck traffic is not discussed. A comprehensive evaluation of well water demand with respect to the regional aquifer and local existing demands is not implemented. The peat unloading facility is inadequate and dust generating with no specified covering. Fire safety is inadequately addressed. An evacuation plan for the facility near Hadashville is substituted for a proposed Plant in

Springfield. There is no comprehensive workplace health and safety program with specific detail appropriate to this Project. There are only vague generic platitudes. Dust mitigation and measurement is not adequately considered. Proper protection measures for exposure from caustic lime are not developed. Prevention of industrial wastewater leakage is inadequate. The environmental fate of the industrial wastewater is not fully considered. The aqua-gro fertilizer additive containing a known endocrine disrupter, ethoxylated alkyl phenol, should not be used.

This whole process demonstrates systemic failure. There have been no public presentations to date. The EAP contains omissions such as an appropriate fire evacuation plan, truck traffic hazard, and use of an endocrine disrupter. There is no indication of a TAC review. The mine closure plan and financial security required before the peat mining can begin was never filed. The Berger Mining Project approvals should be suspended until mine closure and financial security for the peat mining operations are fully complied with.

██████████
██████████
██████████
Telephone #s Residence: ██████████, Cellular: ██████████

Dear Krystal Penner Telephone: 204 945-7145, Toll Free: 1 800 282-8069 Fax: 204 945-5229
Environmental Approvals Branch
Manitoba Conservation and Climate
1007 Century Street
Winnipeg, Manitoba
R3H 0W4

RE: Berger – File: 6055.00 – Springfield Bulk Mineral Material Handling and Mixing Plant Development
22054 Oakwood Road 64N, RM of Springfield (NW ¼ Section 23-11-4)

1. **Project Overview** Page 4, 1.1 Berger Peat Moss Ltd. is misleading and is wrongly describing it's proposed description of what it is constructing and operating, it is NOT horticultural or agricultural in nature, it is a **Bulk Mined Mineral mixing plant** with Raw Mined mineral such as vermiculite, lime, perlite and masses of partially carbonized plant tissue(peat moss), Magnesium nitrate, along with Natural Resources (not agricultural) such as wood chips/fiber and plus chemical additives and fertilizers.
For the safety of the residents and environment I request a delay of approval from the Environmental Approvals Branch review of the Berger application for a License as per the Environmental Act so that the Provincial government agencies of the Mines Branch and Manitoba Water Stewardship be consulted prior to the issuance of a development permit in keeping with the RM of Springfield zoning by-law Sections 41-55 Special land use regulations 54.2 Development Permit Review.
2. **Land use** Page 7, 1.4 Land use Falsely stated. There are several long time (40 years +) Springfield residence that live in close proximity. Additionally, omitted is access from Lorne Hill road (gravel). Please note *Peat moss has wrongfully been deemed agriculture by the council of the RM of Springfield (Annex 1) April 25, 2019 when a major resolution was resolved to include peat moss in the Springfield Zoning By-law to accommodate Berger who purchase in March 2019. There was **NO** notification given to the surrounding residents nor were there public hearings.*

The link to *The Planning Act* is: http://web2.gov.mb.ca/laws/statutes/ccsm/_pdf.php?cap=p80.

Zoning By-Laws and amendments to zoning by-laws are required to be by a by-law (not a resolution) and follow a public hearing process. See sections 46 to 55 with respect to passing a zoning by-law. Section 57 says the process also applies to an amendment. It appears that the processes in *The Planning Act* were not followed for the amendment referred to above.

¹An amendment to a zoning by-law must be generally consistent with provincial land use policies (see s. 62(2).

The link to the Provincial Planning Regulation is: <http://web2.gov.mb.ca/laws/regs/current/081.11.pdf>

Peat moss mining in that regulation is in Policy 8 under Mineral Resources (see pages 39 and 40 of the regulation). The definition of "agricultural operation" (see page 3 of the regulation) does not reference peat moss.

Therefore, I am requesting a public hearing to legally address the major improper amendment/change to the

By-law (Annex 1) and a deferral of the Environmental Approvals Branch review of the Berger application for a License to address this concern.

3. **Public Consultations** Page 7, 1.5 **No** notification and /or public consultation has been done with the residents, all meetings with the Councillors of the RM of Springfield has been done in camera, therefore council is not willing to discuss.
The Vail of Covid-19 has been used as the reason to have no consultation and to reschedule an alleged public presentation/job fair with no other tentative dates given, hence the project should also be delayed until consultation can be honored. Additionally, Berger could have easily mailed out information to a minimum of residents i.e. to the residents listed on the Well Inventory – 1-mile radius which appears in Annex 2. Note the Proposal's Advertisement posted June 23, 2020 was place in a paper not delivered to the surrounding neighbours, why?
4. **Services Usages** Page 8, 2.3 The two new wells that Berger drilled are 5-inch wells into the existing aquafer to approximately 300', the wells capacity will top out at 4800 gallons an hour, (2 wells @ 80 gallons per minute). As Berger stated in its application that it is *not certain* that the rate of water usage can be supported, under 2.4.4 Water Inputs and Wastewater Berger states that it "**is likely sufficient.**" This is extremely concerning for the residents as wells will go dry!

Water Quality

The Berger's report did not contemplate the effects to the 50 plus residential wells identified by Friesen Drilling in the environmental report.

Water levels of existing residential wells may be impacted by the addition of these 2 high volume wells Berger has put in.

Residential wells have been compromised in the past during the construction of the floodway and most have been re-drilled by the Province due to fracturing in the aquifer.

A more comprehensive test for water flow and recovery for residents' wells must be required to fully understand the potential impact and protect the rights of the residents. As Friesen Drilling Report states, its report is only for their client Berger, and Friesen does not stand by its findings for anyone else, so what good is it?

Residents are additionally concerned about water quality and well head pressure and volume of the current wells. The Berger report does not accurately reflect these concerns.

- **Who will pay if all the residents' wells dry up or become contaminated?**

Should the Environmental Approvals Branch, Manitoba Conservation and Climate approve Berger proposal will the branch cover the costs of: re-drilling wells deeper and or hauling in water and the water storage units and the retrofitting that would be required for the effected residents? Will Environmental Approvals Branch, Manitoba Conservation and Climate pay wages if someone becomes sick from drinking contaminated water? Berger openly acknowledges, refer to section 3.4 that the project could affect the water quality through contamination of the surface water and/or underground aquifer. This alone should be a reason to stop the Berger development. Berger also acknowledges that the aerial peat particles contaminate surface water. Mitigating the problem with a couple of rows of trees and not working on windy Manitoba days (Berger did not mention which wind velocity would shut them down) the plan is weak and very concerning.

Water testing of resident's wells should be done at Berger's expense prior to approval of the commencement of operation and there after yearly for a period of years Berger operates for comparison.

I request additional time so that an engineering firm can be hired to determine an estimate to the above concerns' costs: drilling, hauling, retrofitting and extras. Once the above cost is determined Berger should be required to hold a bond based on the estimate of the engineering firm to protect and cover all costs to the existing residents. Will the approval board delay approval and cover the cost of hiring an independent engineering firm on behalf of the residents to protect our rights?

Services Usages 2.3 a new large septic infrastructure is proposed which refers you to section 2.4.5 Waste Water Management and informs us that industrial waste will be held in holding tanks and will be hauled away and not put to the septic field, however section 3.4 Berger states "finally domestic and industrial wastewater will be handled through existing and a new septic field installation". Berger has made a **very** concerning contradiction, which is it hauled away or into a septic field? Berger report then referring you to annex 4 for the exact composition of this industrial wastewater. Annex 4 does not describe the industrial mining waste; it talks about rain/storm water. Sision Blackburn Consultant also failed to mention that along Lorne Hill directly across from the proposed plant are residential homes.

Which government agency will monitor the industrial mining waste discharge; what licenses will be required? Dumping Industrial mine waste into septic fields above our aquifer is unacceptable, know wonder Berger states section 3.4 the project could have an effect on water through contamination to the underground aquifer.

For the safety and protection of the residents I request a delay of the Environmental Approvals Branch review of the Berger application for a License as per the Environmental Act so that the Provincial government agencies of the Mines Branch and Manitoba Water Stewardship can be notified and be consulted prior to the issuance of a development permit. Berger may be required to make application through the Energy and Mining.

5. Raw Material Inputs Page 9 2.4.2

The dangers of allowing the increase mining of peat moss in Manitoba, to supply Berger with its needed product for operation will not only cause the destruction of the delicate peat bogs ecosystem but most importantly peat moss has a high content of carbon and will release vast amounts of **greenhouse** gases methane. Global warming is of great concern for everyone and especially our youth who look to our grass root politicians and government agencies for leadership to protect the quality of their future.

The European Union and the United Kingdom have already moved to banning the mining of peat moss.

References:

hotbincomposting.com/blog/peat-good-or-bad-what-you-nee-to-know

gardenrant.com/2009/04/ken-druse-dishes-the-dirt-about-peat-moss

treehugger.com/natural-sciences/the-potential-danger-of-peat-moss
gadenguides.com/123924-dangers-peat-moss

Innovations Report: Peat Moss—A Ticking Time Bomb

6. Chemical Inputs Page 9, 2.4.3 Chemical storage capacity should be given for each type of chemical that will be stored. There is an insufficient list of chemical to properly address all the concerns that could arise with water pollution, air pollution and fires. Berger refers readers twice to view figure 4 for more information regarding chemical silos and location however figure 4 is **not included** in the Berger report. Berger states that it would be difficult to pinpoint exact quantity of chemicals that will be stored, regardless Berger must be required to give the minimum and maximum of each chemical that will be stored and it's location as this information will be extremely important for the fire department and the safety of our fire fighters! Berger openly states that the operation is very volatile (Raw material inputs 2.4.2). Berger laissez-faire attitude that "it is difficult to pinpoint" is truly disturbing and concerning, this is the way lives can be lost in a fire emergency. This issue must be addressed, and missing document submitted for all to review before the Environmental Approvals Branch review of the Berger application for a License is granted.
7. Water Inputs and Wastewater Page 10, 2.4.4. All wells on the Berger property should be metered and Berger must pay a fair market value for the water, similar to what a business would pay in Winnipeg. A bond (for an amount base on a value determined by an engineering firm of what it would cost to re-drill, haul and retrofit residents water supply), must be secured, this would be used to pay for any future upgrades or change that will be required or occur to the water supply. The bond must be bought and held by Berger for the duration of there operation and/or the RM of Springfield and/or the Province of Manitoba (Environmental Approvals Branch Manitoba Conservation and Climate) to secure and protect the safety, quality and quantity of the water for a minimum for the 50 residents listed in the 1-mile radius well inventory report (report is out dated) pages 42 and 43. A extension should be granted, this will allow residents the time to have their well water tested. Testing should be at the expense of Berger. Testing should be completed and part of the Environmental Act Proposal application. The Environmental Approvals Branch, Manitoba Conservation and Climate should request and secure at the expense of Berger and or the RM of Springfield yearly residents water testing to protect the rights of the residents for the duration of Berger's operation so that changes can be monitored.
8. Water waste Management Page 14 2.4.5 Independent Inspectors should be hired at the expense of Berger to unannouncedly inspect a minimum of 5? times a year and residents notified of the finding. Berger calculations are base on 1 shift of 30 people, however they will be having 3 shifts so the have grossly under stated their volume of the industrial mining wastes and domestic waste. The Mixing Plant should be 3,675 L/day x 3 = 11,025 L/day. This one calculation makes its waste over the trivializing summary of under 10,000L/day. Berger states wastewater management should be managed and approved under the Onsite Wastewater Management Systems Regulation. Well should be and is are two different things. Has the non-profit educational Onsite Wastewater Management Association been notified, has the association visited the site and have they been given Berger a certification certificate? Should be and calculation errors sounds like Berger has not followed through and more insight is required by the Environmental Approvals Branch, Manitoba Conservation and Climate prior to completion of Berger application.
9. Decommissioning and Reclamation Page 15, 2.5 Once again this is just a maybe, could be, should be statement, that Berger will put the prime agricultural land back to the original state. Berger will discuss this with the RM of Springfield and your agency. Then now is the time for The Environmental Approvals Branch, Manitoba Conservation and Climate to act and have **caveats** place on the property prior to passing the

environmental review to assure the property will be properly decommissioned and the prime agriculture land repaired at the cost of Berger before they can sell the property.

10. Emergency Response Page 17, 3.1.1 Fire Oh my, once again Berger falls short and does not take the fire issue seriously. When lives are at stake Berger must be, not should be proactive, the number of available **filled** pumper trucks should be known. The amount of chemical on hand (*'as difficult as it might be'*) should be known and identified for the fire departments so that they can combat the fires appropriately with water or with fire retardant chemicals. Consultation with Oakbank's small fire department as well as Birds Hill and Winnipeg's Fire departments should have already been done. Fire departments should be consulted prior to the completion of the review. Berger has clearly stated, and more than once, that the mined product is very volatile and highly flammable, now add some fertilizer and other chemicals into the mix and we have figuratively a ticking time BOMB! Which may not be put out with water alone. In the spring, summer or fall a fire at the plant may additionally spark grass fires so response times must be swift to protect the residential homes next to the plant and the homes across the road. Berger may aim to be as self-reliant as possible regarding firefighting but when a fire breaks out with very volatile and highly flammable product it can become violently out of control too quickly for inexperienced employees whether called a Team leader or not, to be expected to stay and fight the fire, their aim will be to the nearest exit, as it should be. Responsibilities and RULES TO FOLLOW IN THE EVENT OF FIRE go out the window when your life is on the line. The link below is an article of a smaller Plant that burned. The co-owner states that "It was just a matter of time". It took 22 fighters from two fire departments to put it out. <https://www.cbc.ca/news/canada/new-brunswick/theriault-and-hachey-peat-moss-plant-fire-baie-sainte-anne-1.4589400>
- Note there is NO lake on the property for a pump to operate from, there is a small man made pond, and Berger does not address what they will be doing to stop the small pond from freezing in the winter (6 months of the year), a question that needs to be asked?
- Note the fire fighting procedures have just been taken from the Hadashville Plant which is not the same as the proposed Oakwood Road Bulk Mine Mineral Packaging Plant. A cookie cut approach to fire fighting and saving lives should not be taken, consultation must be explored with Oakbank, Birdshill and Winnipeg Fire department and Berger complete a proper Emergency Response Plan before Environmental Approvals Branch, Manitoba Conservation and Climate reviews and concludes on the Berger application for a License.
11. Atmospheric Environment Page 21, 3.3 A better description of the in plant dust collectors should be given i.e. make, type, and quality of exhaust, the collectors may work to improve the air quality within the plant but what is it expelling into the exterior air that the neighbours breathe, will scrubbers be used to clean the exhaust? At what height (level) will the peat be stored within the bunkers? What is the volume of water that will be used to mitigate dust? The volume of water used to mitigate dust was not calculated in section 2.4.4. Water Inputs and Wastewater nor in section 2.4.5. Wastewater Management. At what wind velocity will operations stop, and will this apply to all directions? Planting a double row of trees (what size?) might mitigate some peat particles 15 to 20 years from now and it will not mitigate the sound from the industrial trucks, loaders and other heavy equipment that have high pitched back up noise. Plum coming from the plant can be stopped with a proper exhausting system, and plums from the bunker can be stopped with screening. The Atmospheric Environment pollution must be and can be considerably better handled more

review is required.

12. Water Quality Page 21, 3.3 **'This Project could contaminate the surface and/or underground aquifer.'**

Berger just writing the above underline statement in their proposal sounds alarm bells & whistles! ALL must, at this time, be concern not just for the residents next to Berger's Bulk Mining Packaging Plant but additionally the town of Birdshill have wells that they draw water from that aquifer for their residents, has the council of Birdshill being notified? If not, the Environment Approvals Board should have an obligation to let the Council of Birdshill know that their water source could be contaminated by this project.

We are referred to section 3.1.2. for some mitigation measure please note brooms and paper towels on concrete floors may work well for small spills but informing us that the are going to use contaminants (2- cubic-foot bags of peat to clean up contaminants does not make sense to me or are these mitigate measure just for interior plant spills? More explanation needs be given in this area.

As Berger says Finally, domestic and industrial wastewater will be handled through sceptic fields. Once again, the alarm bells and whistles are sounding industrial mining waste must not be allowed to enter sceptic field and seep down into the aquifer. Referring us to section 2.4.5. to prevent any contamination this is a section that give us volumes of wastewater (with miscalculations I might add) not more information contamination prevention. Note regarding a list of chemicals, chemical silos and location regarding figure 4 is **not included** in the Berger report.

One thing I will give credit to Berger for, is that they have *told us so* and their *I told you so* attitude is concerning because should the Environmental Approvals Branch give approval who is liable, Berger or the Branch when the water is poisoned or wells go dry? Remember Berger has openly told us that the amount of water they will be taking out of the aquifer could be more than what mother nature will put back into it "is likely sufficient." Remember Berger *told us so* the Project could contaminate both surface water and/or the underground aquifer!

Once again, I request a deferral of approval until Provincial government agencies of the Mines Branch and Manitoba Water Stewardship be consulted prior to the issuance of a development permit. At this time, I ask is the Environmental Approval Branch notifying the Mines Branch and Manitoba Water Stewardship? Should it not be the responsibility of the Environmental Approval Branch to notify the Mines Branch and Manitoba Water Stewardship I request that I be notify quickly, so I may take necessary steps.

13. Vegetation/Wildlife Page 21, 3.5 The Berger Project is large, with a lot of drainage that will inevitably have poisonous wastewater draining into the ditches and eventually into the Red River floodway. The contaminated surface water will be drunk by the abundance of wildlife that lives in the area: deer, fox, coyotes, muskrat, beaver, woodchuck, racoon along with a large variety of bird, eagle and osprey and waterfowl to name some. Berger does not mention a single word about wildlife. The wildlife is a great value to the quality of life for the Residents in the area. Residents will also have to now be concerned with their children and family pets playing in this contaminated water, very concerning.

14. Noise Page 22, 3.6 The noise coming from the plant will NOT be typical of agriculture operation the noise level will be in keeping with **Bulk Mined Mineral mixing plant** with Raw Mined mineral such as vermiculite, lime, perlite and masses of partially carbonized plant tissue(peat moss), Magnesium nitrate, along with Natural Resources (not agricultural) such as wood chips/fiber and plus chemical additives and fertilizers, will require heavy mining equipment with loud sounding alarm back up systems. The loud sounding alarm back up systems working 24 hours a day will most definitely destroy the quality of life for the residents. Not only

will it make the daytime unpleasant, but it will interrupt sleeping, this will be very disturbing! Especially for the residents directly across from the project. Berger said they will stay in close contact with local residents well to date they have not contacted any of us! I do know of a resident who went to ask the plant manager if Berger could redirect a light down to the ground, as this light shines directly into their window, he was told to go plant trees, not very considerate. Hopefully if we ask for less noise at night, we won't be told to go buy ear plugs.

- 15 Social Environment Page 22, 3.7 The amount of minimum wage jobs, road destruction and **Traffic** 6500 plus Semi trailers will be loaded or unloaded at the packaging plant a year = 35 Trucks/day
Employee vehicles traffic will exceed 150 return visits a day

The Berger environmental report does not address:

1. Safety concerns of increased traffic on gravel roads
2. Noise levels should not exceed current levels
3. Dust control needs, road improvements and repairs need to be addressed with the significant rise in traffic before approval is granted. Note Highway 207 is a Provincial road and The Highways Department should be notified to assess the dangers regarding the increased turning onto a gravel road and whether a turn lane is required? The safety of the roads must be reviewed before a child riding their bicycle or a horse back rider is KILL as they have long shared the road.

Loss of Property Value

The Berger environmental report does not consider the impact to property values if this packing plant is allowed to continue. A professional land and property appraiser should be commissioned to report to how property value may be affected and how residents should be compensated.

- 16 Summary

I respectfully request that the Berger application be delayed until missing documents can be provided i.e. Figure 4, and the full list of Chemicals that will be on site, a readable copy of Sison Blackburn Consulting overall grade plan, the report written only in French be translated to English and a revision of wastewater calculation errors be corrected. I respectfully request that the Berger application for a License be delayed until the Provincial government agencies of the Mines Branch and Manitoba Water Stewardship and the Provincial Highways Department be consulted and the Council of Birdshill be notified prior to the issuance of a development permit. I also request that a Public Hearing be held by the Province of Manitoba and the RM of Springfield to address the multitude of concerns: Protection of Water supply, a variety of Pollutions, Improper amendments changes, Improper use of agriculture land, NO public notification or consultation. It is concerning that the RM of Springfield has lack of regard for procedure regarding the Environmental Approvals Branch, note that this is the third large project that has started development before building permit and Environmental Approval: 1.) the P & H elevator on Poplar Road 2.) The Silica Sand Wells south of Vivian and 3.) Berger Industrial Bulk Mineral Packing Plant who are building as I type. This 'Wild Wild West' approach must be questioned, and the rule of procedure and law respected as well as the rights and protection of the Residents.

Sincerely,
Margaret Marion-Akins

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Cc: [REDACTED]
Subject: Concerns/Concerns re Berger Peat Mixing Plant
Date: July-22-20 8:47:37 PM

Dear Krystal,

We attended the Berger Information session in Dugald last night and want to follow up on our previous email and phone call regarding the proposed Berger Mixing Plant in Springfield. We left the meeting with more concerns than when we arrived.

Does the Provincial government do their own testing of the impact on the aquifer or do you rely on the Friesen Drilling report provided by Berger? The end of their report states that the assessment was only for Berger and was not to be used by other organizations or persons as Friesen Drillers would not be held liable. Many residents are concerned about what happens if their wells drop. Who will cover the cost of re-drilling wells if required? One of the individuals attending the meeting expressed concern regarding a chemical or additive which is an endocrine disruptor being used in the mixing process. Is it being used and what are the risks of this contaminating the aquifer? Do you assess the environmental safety of the materials Berger uses in the mixing process?

Although the Berger trucks delivering peat are covered with tarps there will still be dust escaping and with the volume of peat being delivered and processed the peat dust will end up along the route. Can this dust be harmful to the residents along the route? What bacteria or spores are being spread? Who is measuring this?

Another serious concern of ours is the increased traffic. Highway 207 is a very rough highway (concrete slabs) with plenty of traffic already from gravel trucks from the surrounding gravel pits. Empty trucks are incredibly noisy as they bang along that highway. Berger reports they will have an average of 25 semis delivering peat daily which will only add to the "din". There is also the traffic from employees at every shift change and additional traffic moving finished product to the city. With increased traffic also comes increased likelihood of accidents.

We have concern regarding the possibility of a peat fire and lack of sufficient resources In our Municipality (Springfield only has 2 pumper trucks and volunteers) to fight a fire. What is the short and long term impact of a peat fire and the smoke it generates to the residents living near the facility? It appeared that Berger did not have a plan for evacuation of residents near the facility.

Thank you for addressing these concerns.

Sincerely,
Walt and Terry McKee

Sent from my iPad

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Environmental concern
Date: July-13-20 6:31:37 PM

Please include me on the petition to stop the water being contaminated

Sent from my iPhone

Krystal.penner@gov.mb.ca
Berger Peat Moss Ltd. – Horticultural Mix Plant – File: 6055.00
Environmental Approvals Branch
1007
Century Street
Winnipeg, MB R3H 0W4

Attention Krystal Penner:

The mining and production of peat is unacceptable in today's climate. Peat land is amongst the most valuable ecosystems on Earth as they are critical for preserving global biodiversity, provide safe drinking water, minimize flood risk, act as natural fire breaks and of course, address climate change. Their very destruction from mining and agricultural expansion make them a major source of greenhouse gas emissions. Peatland restoration is often talked about by the Canadian Sphagnum Peat Moss Association but restoration only brings about a wetland or a marsh, never a bog. They cannot be restored, they are irreplaceable.

1.4. Land use

The Berger EAP states, *"The area of the project is currently zoned as "AG" (Agriculture General Zoning District) in which peat moss is a defined activity approved by the RM of Springfield (Annex 1), thus granted the Project the status of permitted use"*.

The RM of Springfield is in direct contravention of The Planning Act due to the way they granted Berger a permitted use;

"#19-195; Be it resolved that the definition of agricultural activities within the Springfield Zoning By-law be amended to include peat moss. Moved by Howard Bredin, Seconded by Rick Wilson. Dated April 25, 2019."

Zoning By-Laws and amendments to zoning by-laws are required to be completed by a by-law and not a resolution and follow a public hearing process as per section 46(1). There has yet to be a public hearing held on this change to the zoning bylaw. However, a public hearing is not required if the alteration is a minor adjustment that does not change the intent of the bylaw, 74(3). To define peat moss as an agricultural activity is not a minor alteration, it changes the intent of agricultural activity! Peat moss is a mined substance. It is not grown in rows, harvested and seed collected. It is unsustainable.

The RM, seemingly under the direction of CAO Colleen Draper, also held In Camera sessions throughout the process to discuss this change. The Municipal Act is specific about the topics that council may discuss in camera.

It seems only 152(3)(b)(iii) *"a matter that is in its preliminary stages and respecting which discussion in public could prejudice a municipality's ability to carry out its activities or negotiations"*, and (iv) *"the conduct of existing or anticipated legal proceedings"* could be construed as reasons to meet in camera. But there are limits to that interpretation. The following quote from Thompson, Dorfman and Sweatman Law, regarding in camera sessions states, *"if the discussion relates to a possible zoning by-law change or development approval that the municipality is considering, it is most likely that the meeting must be held in public."* <https://www.tdslaw.com/site-content/uploads/candid-about-in-camera2.pdf> The article explains that just because there is a statutory right of appeal, does not grant that all subjects discussed by council will be up for litigation. It seems the way in which the RM of Springfield aided Berger Peat Moss contravenes The Planning Act, The Municipal Act and is a betrayal of public trust. Before any decision on

this development is made by the EAB, the actions of the RM of Springfield need to be investigated. It could very well be illegal to allow this plant to be constructed on this site.

2.4.5. Wastewater Management, Mixing Plant (industrial):

The EAP states that the mixing plant *“wastewater (all the added water and additives are kept within the final product), cleaning of certain fertilizer drums and tanks will release industrial wastewater that Berger will handle through holding tanks.”*

Of course, more than vinegar will be in the waste water because of residue build up as per the letter from Stantec Consulting Ltd. The following are the list of additives.

“5. Additional Info:

a. Fertilizer Concentrations (full specifications attached):

- i. Aqua-Gro, 100 L of water mixed with 9.5L of Aqua-Gro*
- ii. Calcium Nitrate, 100 L of water mixed with 60.4 pounds of calcium nitrate powder*
- iii. Magnesium Nitrate, 100 L of water mixed with 60.4 pounds of powder*

b. Vinegar Wash Concentrations (specification attached):

- i. 250 L of water mixed with 1.25 L of vinegar (5% acetic acid)”*

The safety data sheet for AquaGro shows it is AquaGro 2000M. The safety data sheet fails to list the chemical components. Only the word “proprietary” is shown in that section however, upon a quick inquiry into AquaGro 2000M, it is 99% Ethoxylated alkylphenol and 1% water.

<https://aquatrols.com/wp-content/uploads/2016/10/AquaGro-2000-M-US-Label.pdf>

This group of manmade chemicals are well known to be endocrine disruptors, hepatotoxic, genotoxic and have been detected in air, water, soil, food products and human blood and urine worldwide. They are especially deleterious to aquatic environments.

The Lake Winnipeg Foundation has raised concerns and continues to do so about the inadequacies in sewage treatment facilities. Sadly, this insidious chemical’s destructive properties will continue to be released through Berger’s final peat products. There are alternatives that can and should be used to replace this chemical.

Annex 2: Hydrogeological Investigation Results by Friesen Drillers

I found Friesen Drillers study inadequate. Berger plans on running this plant for 24 hours 7 days a week with 3 waste cleanings per week. Friesen Drillers is treating the introduction of two new industrial wells as if they would only effect those within a one-mile radius. The cumulative effects of water usage throughout the Aquifer is more appropriate in acquiring correct data and the true effects that these two new wells will bring and in confirming the sustainability of the aquifer. This has not been undertaken in their report. It is essential that Manitoba Water Stewardship respond to the sustainability of these wells.

Table 3 has not been included in the EAP. If the reason is due to property owner names perhaps removing the names and NOT THE ENTIRE DOCUMENT would be more appropriate.

Section [12.0.2](#) of The Environment Act, “Climate change considerations”;

The amount of greenhouse gases to be generated by the mining of the raw product that will supply this plant, the transportation of both raw and finished product and the energy consumption involved in all aspects of the plant must be measured.

In conclusion, this development is taking prime agricultural land out of production. Another toxic manmade element is to be released into our environment. Two more industrial wells will take water out of the aquifer without a proper study undertaken on the aquifer’s sustainability. Mining and producing peat products are passé and dangerous. Public opinion has changed due to the large amounts of information and the concrete evidence to the negative effects from peat mining and its production. Losing peatland is avoidable. There are many alternatives that can be substituted for peat. We should be looking at those, instead my provincial government entertains the idea of continuing to mine and produce peat.

I am against Berger Peat Moss Ltd. – Horticultural Mix Plant – File: 6055.00

In the interest of public and environment health, deny File: 6055.00

Sincerely,

Tangi Bell

Since this is a public review, include our names with our letters. Eliminating names from letters is not in keeping with “public” reviews. Having names associated with the letter is a brilliant way of keeping the process honest otherwise you create an atmosphere of social media anonymity.

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Date: July-06-20 8:54:14 AM

[REDACTED]
[REDACTED]

July 6, 2020

Krystal Penner
Environment Officer
Krystal.Penner@gov.mb.ca

Paper copy mailed to: Environmental Approvals Branch
Manitoba Conservation and Climate
1007 Century Street Winnipeg MB R3H 0W4

Re: Berger Peat Moss Ltd. - Horticultural Mix Plan - File: 6055.00

I wish to express my opposition to this proposal. It is wrong on so many levels, commencing with the fact that peat bogs are again being stripped which is not good for the environment, not good for the area in which the mining extraction is taking place, it not only pollutes our air but it deprives it of the very thing that works to keep our air quality good and our water clean. You are selling our heritage out to big corporate entities without any consideration of the future of our children. You cannot breathe money, you cannot drink money, and it has no value but that which mankind assigns to it, unlike air and water and the subject in question, peat.

A mile away from this peat plant is a facility that caters to children, Deer Meadow Farms. You are polluting the air they are ultimately breathing as they play on the straw bales. The land on which this former horse facility sits was taken out of production years ago by another company in business to make money, not to produce crops that feed humans and animals.

Peat mining leaves miles of devastation. I myself visited the site of a huge operation in Reynolds that removed a small lake and stripped off the topsoil, leaving a depression miles and miles long, nothing but devastation. In my area there is a much smaller piece of land that was mined for peat. It has sat, for 40 years, unproductive. In the spring, it sits full of water and the remainder of the time, nothing but the hardiest of weeds grows, a mile of devastation and whoever was responsible for the mining did nothing to rehabilitate the land. I would argue there is not much you can do with land that has been deprived of the soil which nurtures life and the peat below which holds moisture for the roots. The failure of rehabilitation efforts in the aggregate industry tells it all.

There is no point in dwelling on or reminding you of the harm this industry does to the environment, the carcinogens in the chemicals being used in the process, the draw down on the aquifer that is already under threat from the aggregate industry. You are well aware and frankly, just don't care. However, there are volumes of proof of the devastation caused by disturbing more than just the very top of the soil cover. The Province of Saskatchewan soon learned what happens when you remove trees and natural vegetation and over cultivate large tracts of land. Sloughs, swamps, bogs are all part of the natural order and provide habitat for wildlife. All life on planet Earth is interconnected and dependent on each other's survival with the possible exception of mankind who tries to alter the state in which they find everything. Species are being lost in alarming numbers and people like me pour millions into trying to preserve what is left while Berger Peat gets licenses to raze huge tracts of our natural spaces.

As an Environment Officer, hopefully one with integrity, I do not need to tell you that this application MUST be denied. Our flower gardens have survived nicely for many decades without commercial peat products.

Yours sincerely

Heather A. Erickson



MANITOBA ECO-NETWORK

3rd Floor 303 Portage Ave., Winnipeg MB R3B 2B4

Tel: 204-947-6511 www.mbeconetwork.org

Comments on Berger Peat Moss Ltd. Horticultural Mix Plant

July 13, 2020

The Manitoba Eco-Network (MbEN) appreciates this opportunity to comment on the Environment Act Proposal (EAP) for Berger Peat Moss Ltd.'s proposed Horticultural Mix Plant in Springfield, Manitoba. Since 1988, MbEN has promoted positive environmental action by supporting people and groups in our community. MbEN is currently transitioning our programming to focus more on policy advocacy, engagement in consultation processes and developing capacity building tools that benefit the environmental non-profit sector and our member groups. It is important to ensure organizations like ours have the ability to engage in the environmental decision-making processes that impact citizens and provide a voice for our public environmental interests. We welcome more opportunities in the future to engage with Manitoba Conservation and Climate in the assessment of projects in Manitoba to ensure strong and effective environmental protection measures are required.

Local residents of the RM of Springfield have contacted us and expressed serious concerns about Berger's proposed development and its potential impacts on the environment and human health. This includes plant truck traffic, water withdrawal from two high capacity wells, dust generation and bioaerosols, wastewater treatment and fire risk. We briefly reviewed the EAP for the project and found it lacks considerable detail and does not contain sufficient information to ensure an informed decision about the project and its potential impacts can be made. We ask that the Director require the preparation of a detailed Environmental Impact Statement (EIS) for the project, with public input into the scope before such a report is undertaken. We have outlined some specific areas of concern below.

Public Engagement

It was concerning that the EAP stated that no public consultation events have been held. While the current COVID-19 situation has made public engagement challenging, there are many electronic tools available that could have been utilized by Berger to allow for some form of public education and consultation event to occur prior to the submission of the EAP. There is a need for public engagement opportunities and input into the scope of a more detailed EIS for this development. MbEN requests that a Clean Environment Commission public hearing be held to ensure meaningful public participation opportunities occur before any licensing decisions are made.

Climate Considerations

The EAP does not contain sufficient information about climate change considerations. *The Environment Act* (s 12.0.2) requires the Director or Minister to consider the amount of greenhouse gases to be generated by a proposed development and the energy efficiency of the proposed development when making licensing decisions. MbEN recommends Berger be

required to provide such information in a more detailed EIS for the development to ensure this regulatory requirement is fulfilled.

Cumulative Impacts

The cumulative impacts of the proposed development must be considered, especially since there will be trucks delivering peat mined from the wilderness on a twenty-four hour basis during growing months. Peat mining will add GHG emissions into the atmosphere, increased truck traffic will add GHG emissions into the atmosphere. It is unclear if there will be an increase in peat mining in the province with the establishment of additional processing capacity, which is also a potential impact that should be considered before any licensing decisions are made. Other cumulative impacts include stresses to the aquifer.

Policy Considerations

There is a need to consider this proposed development within a broader regulatory and environmental policy context. The EAP does not contain enough information about potential cumulative, climate and environmental impacts so there is a need for more information from Berger, ideally in a more detailed EIS. This information is necessary to allow for better consideration of whether a development of this type should be approved within the current environmental and climate context in Manitoba. MbEN does not think a development of this nature aligns with current environmental policy including the Southeast Regional Groundwater Plan for Manitoba, the Made-in-Manitoba Climate and Green Plan, which proposes to reduce GHG emissions, and Manitoba's Boreal Wetlands Conservation Code of Practice.

Based on the deficiencies outlined above and the significant public concern surrounding the project, MbEN recommends that the Director consider the proposal as a Class 2 Development in accordance with section 11 of *The Environment Act*. MbEN also requests that the Director recommend that the Minister require the Clean Environment Commission to hold a public hearing to allow for public scrutiny of a more detailed EIS. It is in the public interest to ensure proposed developments of this nature are given the highest level of scrutiny possible to ensure environmental impacts, climate impacts, cumulative impacts and broader environmental policy implications are considered before a final licensing decision is made.

MbEN appreciates the Department's consideration of these comments and welcomes future opportunities to engage with the Department in the assessment of projects in Manitoba to ensure the highest level of environmental protection measures are required. Under *The Environment Act*, the Department is tasked with protecting the quality of the environment and environmental health of present and future generations and providing the opportunity for all citizens to exercise influence over the quality of their living environment. We are confident you will adhere to these principles and ensure an informed decision about the proposed development can be made.

Sincerely,

Glen Koroluk, Executive Director
Heather Fast, Policy Chair

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Proposed Berger Peat Moss plant in the RM of Springfield
Date: July-10-20 11:20:34 PM

To Ms Penner,

We are residents of the RM of Springfield and have just been made aware of the proposed peat moss plant at 22054 Oakwood Rd by Berger Peat Moss Ltd.

We are very concerned and disappointed that so many changes were made without consultation of the area residents. We have several questions:

How is it possible that construction began before receiving a building permit?

Why was there no provincial environmental review?

How is it possible that a building permit (for a project that has a major environmental impact) was granted by the RM of Springfield without a review?

This property is zoned agricultural. It will have to be rezoned to "business" to meet provincial regulations.

There are strict bylaws regarding the changing of zoning which includes public hearings.

Land values will be affected. The quality, volume and safety of our well water will be in jeopardy.

The increased traffic, ie. semi trailers would be of grave concern to all area residents.

It is very disturbing that this has been going on without any public hearings, proper consultation and transparency.

We believe a public hearing is essential before Berger continues.

Thank you.

Roland and Simone Gerl

[REDACTED]

Ph. [REDACTED]

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: proposed Berger Peat Moss plant in the RM of Springfield
Date: July-10-20 9:23:08 AM

Hello Ms Penner,

We are residents of the RM of Springfield, and we are writing this letter to you to express our concerns about the proposed peat moss plant being established by Berger Peat Moss Ltd at 22054 Oakwood Rd.

We believe several things have been done improperly, somewhat secretly, and without proper consultation with and consideration for the area residents.

These concerns include.....

- 1) Berger began construction of the facility on Oakwood Rd before applying and receiving building permits from the RM of Springfield.
- 2) The RM of Springfield council appears to have subsequently granted the building permits before a provincial environmental review.
- 3) The RM of Springfield council appears to have willingly re-classified ("by resolution") peat moss from a mined mineral under the provincial act to a harvested agricultural product. This appears to be improper and invalid, as the natural resources development designation of peat moss is a provincial statute, and one that municipalities cannot counteract or change simply with a council resolution.
- 4) A change in zoning from agricultural to business use will be required for this address/area in the RM to meet provincial regulations for Berger to operate their mixing plant. The changing of zoning bylaws must follow a strict public hearing process, and must not, cannot, and should not be done simply with a council resolution. A public hearing is essential for good governance, transparency, community feedback, and all relevant information to be shared and discussed. Zoning bylaws are in place to protect local citizens.
- 5) The wisdom of establishing a commercial processing and packaging plant in a residential/agricultural setting.
- 6) The impact on residential property values of establishing a commercial processing and packaging plant in a residential/agricultural setting.
- 7) The impact of the operation of this plant on the water levels (volume) and water quality in the surrounding area. The plant will be digging wells up to 300 feet deep.....what impact will this have on local residents, as they draw their water from wells on their own properties? What impact will these deep Berger wells have on the underground aquifer, which supplies water to many residents in the RM of Springfield and the RM of East St Paul?
- 8) The impact of this plant on the local air quality.
- 9) The impact of a plant that operates 24/7 on the local residents.....traffic, road safety, sound/noise levels and light.

Because of these many concerns, we believe a public hearing is essential before Berger proceeds any further.

Thank-you,

Rick and Petra Pedde

[REDACTED]
[REDACTED]
[REDACTED]
PH: [REDACTED]

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Re Environmental act Proposal for Berger Peat Moss Ltd.
Date: July-14-20 7:34:43 AM

Dear Ms Penner,

It was brought to my attention that a Berger peat moss plant is being proposed for a location on Oakwood Road in the western part of the RM Springfield. I had a chance to look over the submission from the company and have some serious concerns regarding their intent to deal with several key issues that impact the surrounding community.

First and foremost, is their statement that their wells COULD impact aquifer water supplies and quality. While they have identified private wells within a mile, there are a far greater number of private wells extending past that perimeter for several miles around the site beyond the 1 mile radius (presumably contamination could travel beyond that distance if significant ... we need clear ideas of where they will be accessing the aquifer and how that relates to what private wells that may be sharing that water. A far denser number of residences are just out of that one mile perimeter. It would be most useful to know more exactly what portion of the aquifer they are accessing and how that links with wells at least within a 3 mile radius ... I have heard the water source is extensive and so many more well could well be impacted. We need clear independent information/confirmation as to the possible impact beyond their immediate area, if such an assessment is possible. Furthermore, they do not state how they will monitor the water supply for the surrounding residents ...vague reference to monitoring does not tell us if private wells will be regularly tested for pressure/supply as well as quality, who would pay for the costs and who would report/share the testing results. Extensive regular testing was done during the years of expansion of the Red River Floodway and as a resident living next to the floodway, I am well aware of the impact that periodically occurred. Furthermore, some clear criteria for defining unacceptable water quality changes should be identified as as to make clear for all parties what any changes would mean, particularly in terms of responsibility for the changes (ie. Berger's impact should be quantifiable and not simply open for debate if any impact/changes in water in the area occur). It would need to be a coordinated testing and reporting program for an agreed upon period of time involving all signed on participants. Individuals should not be alone in challenging a large corporation in terms of an environmental impact should one occur.

In terms of atmospheric impact, the Berger document is vague to say the least. Two lines of trees on the north and west side, to abate dust from the plant, is naïve at best. The Hadashville facility is in the midst of a forest, the Oakwood site is in a field, with the floodway and perimeter highway west of it and largely open farmland for about a mile. Anyone who lives on property in an open area, well knows that trees, even many rows, barely make an impact on dust; any tree planted will clearly take at least 15 years to be of significant height and presumably, evergreens would be needed since the problem of the peat dust etc would be year round. One could argue that the tree idea would perhaps help the look of the site, if they were kept up appropriately, but would have little impact as a dust control strategy. So this raises the question as to how serious they are in addressing the issue.

Oakwood road is a minor gravel road and the dust from heavy truck traffic will be significant in all but winter. Berger's proposal for watering the road for dust control is just naïve. Having recent first hand experience with dust from developments on HWY207 when large trucks are hauling land fill and earth on gravel roads, watering road surfaces is cheap but at best, diminishes the problem for a few hours depending upon the temperature ... it is near useless in warm summer months. Clearly a Dust Suppression method of low environment impact and high efficiency would be needed and at a cost. . presumably the municipality would be in a position to pay for this as it is a municipal road ... or a clear agreement with Berger would be needed. Dust created or moving onto the intersection of Oakwood and PR 207 would create significant visibility issues. Add to that the crossing and movement of large trucks at a corner with stop signs on Oakwood only, raises the issue of traffic safety.

Noise from the plant and the heavy truck traffic is also of concern to the area residents. It is already a challenge given the condition of PR HWY 207 creating "bouncing" load noise, air brake usage for those living between Garvin Road and Dugald Road (PR 15). Presumably the heavy transport traffic mentioned in the proposal would be using those routes – on a 24 hour day. A few more trees around the property as proposed again, will not muffle the truck travel noise on Oakwood and PR 207.

While I realize road issues are not likely within the realm of your concern, but someone in Infrastructure and Highways should be made aware of these concerns. With the continuing deterioration of PR 207, the heavy industrial as well as pleasure/regular traffic on this route, the addition of the Berger facility and planned traffic will have an impact on traffic safety for residents and the general community, add significant noise and emissions to the immediate area.

It would be most helpful if public meetings with Berger, residents and appropriate municipal and provincial representatives (environment and highways) were arranged. Yes we have challenges of the Covid 19 pandemic, but that should not be seen as an opportunity to take short cuts and compromise consultation with the community who will be impacted for years, decades to come. Berger states in their proposal they will work with Springfield residents, but clearly, that has not been the case experienced for the residents within the immediate and surrounding area up to this point, leaving open the question about how seriously they do take the community in which they are planning to use for their purposes.

Thank you for your attention in this matter,

Stay safe!

Sincerly

Susan Shefchyk

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Re: Berger Facility Production Concerns
Date: July-13-20 1:04:46 PM

Stop at at this time. Ok

Sent from my iPhone

On Jul 13, 2020, at 11:44 AM, reinhold sawatzky <[REDACTED]> wrote:

Dear Krystal Penner,

I am writing to you with great concern about the large mining, processing, and packaging company, Berger, that is being built on Oakwood Road. They have purchased pre-existing buildings at 22054 Oakwood Road and are now in construction for a large production facility on that same location.

There are many serious concerns that this construction brings to the residents of the RM of Springfield. I have included many in this letter for your review.

The pollution that will be caused by this large facility is not only a health concern for the residents of the RM of Springfield, but also an environmental hazard, including potentially the Provincial Birds Hill Park that is located close by. The impact it will have on nature and wildlife in the area have not been researched and shared with the residents and community members.

The health risks associated with the future operation of the facility on the surrounding residents of Springfield is not researched or confirmed and could thus have grave results in the coming years, results that could cost the community members greatly on their quality of life.

Furthermore, it is a great worry how the water levels and volumes will be affected when the construction comes to fruition. There has been no guarantee that they will remain the same as we currently have in 2020. If Berger constructs large wells of their own it could cause a massive, unrecoverable drain on the water levels of the residents of Springfield and take away the use of our own private wells.

Lorne Hill and Oakwood Road are secondary roads, made entirely of gravel, and will have a minimum of 6,500 semi trucks going through it to deliver the minerals and raw materials to the production facility of Oakwood Road as required for their annual plant production capacity. This brings grave safety concerns for our children and members of the community who use the roads for recreational activities. This is a huge safety concern that should be discussed with the residents of Springfield as it will impact us daily. The noise and road conditions after 6,500 semi trucks are travelling across these roads is significant for those living close the production facility. Because the production facility is planning to operate 24/7 with 3 daily shifts of 30 people in each shift, this means that the lights and noise of the facility will be an ongoing annoyance for the neighbours of the facility and greatly impact our otherwise quiet and peaceful neighbourhood.

Peat moss is a very flammable resource that can burn for many years if ever on fire. This is a serious fire hazard next door to many residential and farm

properties. The pollution that this could cause would be massive and impact the wildlife in the area for many years to come.

Any change in zoning from agricultural to business use must be investigated and checked to see if it follows all provincial regulations, in order to build their processing and packaging operation.

No information has been shared by neither Berger or the council of the Rm of Springfield, giving us residents no room to voice our concerns or address them. This lack of communication is a grave matter as any decision they make will impact us directly and potentially negatively. A public hearing is required in order to properly address our concerns and receive information from Berger executives themselves. We, the residents of Springfield, have the right to be fully, and properly informed of all the impacts of such a large production facility built in our community. We have the right to fully understand the traffic, lights, noise, and pollution that comes and leaves the facility before operation even begins.

Reinhold Sawatzky

From: [REDACTED]
To: [Penner, Krystal \(CC\)](#)
Subject: Re: Berger Facility Production Concerns
Date: July-13-20 1:36:05 PM

Stop for now. Ok

Sent from my iPhone

On Jul 13, 2020, at 11:44 AM, reinhold sawatzky <[REDACTED]> wrote:

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I am writing to you with great concern about the large mining, processing, and packaging company, Berger, that is being built on Oakwood Road. They have purchased pre-existing buildings at 22054 Oakwood Road and are now in construction for a large production facility on that same location.

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Reinhold Sawatzky

Allan and Margaret Akins



July 15, 2020

Environmental Approvals Branch
Manitoba Conservation and Climate
1007 Century Street
Winnipeg, MB R3H 0W4

Attention: Krystal Penner, Environment Officer

The undersigned are residents of the Oakbank area. We respectfully make this submission in response to the Environment Act Proposal (the “**Proposal**”) that has been filed by Berger Peat Moss Ltd. (“**Berger**”) for the construction and operation of a peat screening and mixing plant for horticultural growing media located at 22054 Oakwood Road 64 North, on the NW ¼ Section of 23-11-4 EPM, in the Rural Municipality of Springfield, Manitoba (the “**Development**”). As residents and property owners in the immediate area, we are affected by the Development and we are very troubled by what is being proposed.

We have reviewed the Proposal and it fails to adequately address the concerns that residents of the area have in connection with the Development. We submit that, for the reasons set out below, an Environment Act licence should not be issued by Manitoba Conservation and Climate (“**Manitoba Conservation**”) and the Development should not be permitted to proceed. In the alternative, we request that a full public hearing be held so that the Proposal can be subjected to the further scrutiny that it warrants.

We submit that the Development should not be allowed to proceed because:

1. it endangers the local water supply;
2. there are a number of serious safety issues;
3. it will diminish the quality of life for local residents;
4. the land on which the Development is to be constructed is not properly zoned for the proposed use;
5. it may lower property values in the area;
6. the report prepared by Berger does not provide sufficient information on which to base a valid assessment; and

7. there is significant community resistance to the Development.

ARGUMENTS FOR NOT ISSUING AN ENVIRONMENT ACT LICENCE:

1. Concerns about Water:

Many residents in the local area use and rely on well water. The Development could negatively impact our water supply and jeopardize water quality.

The assessment report prepared by Berger did not fully contemplate the effects to the 50 plus residential wells identified by Friesen Drilling in the Proposal.

We understand that Berger will drill two 5" wells into the aquifer to approximately 300 feet. The capacity of these wells will top out at 4,800 gallons an hour (2 wells @ 80 GPM).

We are very concerned that the water levels of existing residential wells may be impacted by the addition of these two high volume wells. A more comprehensive test for water flow and recovery for residents' wells must be performed in order to fully understand the potential impact.

In addition, the potential impact of this Development on water quality needs to be properly assessed by an impartial, qualified assessor. The release of contaminants into the water supply by Berger's operations could have a devastating impact on the community.

As you may be aware, residential wells have been compromised in the past during the construction of the floodway and most have been re-drilled by the Province to over 300 foot depths due to fracturing in the aquifer.

On this basis of risks to water and quality alone, it would be foolhardy to allow the Development to proceed. At the very least, there must be further study. Even if such a study were to conclude that the Development was completely safe, there should be a significant bond or letter of credit posted by Berger as security for any damages residents would suffer as a result of any degradation to water quality or water supply.

2. Safety Concerns:

(a) Traffic:

We understand that, once operational, there will be more than 6,500 semi-trailers which will be loaded and unloaded at the proposed Development per year. This means an average of approximately 35 trucks per day. We also understand that employee vehicles traffic will exceed 150 return visits per day.

Many of the roads in the area are gravel. Oakwood Road and Lorne Hill Road are gravel secondary roads and are the two primary roads that will bear all the significant traffic to and from the Berger

plant. We have serious safety concerns arising from the increased traffic which could result in dangerous conditions for local families.

At the very least, a complete review needs to be conducted to determine how this significant rise in traffic will affect our roads and safety of our residents.

(b) Fire:

As you are aware, peat moss is highly flammable. Peat moss particles can easily ignite. The site that the proposed Development is to be constructed on does not have adequate fire protection services and infrastructure available to it. The R.M. of Springfield's pumper truck would have limited impact on the containment of a major peat fire at the site.

Given this risk, the Development would be better located in a commercial mixed-use zoning area with fire hydrants.

3. Quality of Life Concerns:

Many residents are concerned that this Development will negatively impact our quality of life. We understand that the Berger plant is designed to operate twenty four hours a day, seven days a week. These operations and the increased traffic on gravel roads will cause:

- (a) noise pollution;
- (b) dust pollution; and
- (c) light pollution.

This is a rural, agricultural community. One of the reasons we live here is because it is quiet. We enjoy leaving our windows open in the summer. Berger's facility would be better suited in an industrial area where it is not going to disturb an established community.

At a minimum, a comprehensive study by professional engineers needs to be prepared to ensure that the Berger operations will not diminish the quality of life for residents.

4. Zoning Concerns:

The Development is located on land that is zoned "AG" Agricultural General Zoning District pursuant to the R.M. of Springfield's Zoning By-Law No. 08-01 (the "**Zoning By-Law**").

The term "peat moss" is not referenced in the Agricultural Use Classes at pages 41 – 43 of the Zoning By-Law. Specifically, the defined term "Agricultural Activities" means a use of land for agricultural purposes. Agricultural Activities specifically exclude "Natural Resource Developments". The definition of Specialized Agriculture does not reference peat moss.

We submit that what is proposed to be done by Berger on the site falls within a Natural Resource

Development. As such, the zoning for the proposed facility are inconsistent with zoning intent and incompatible with surrounding uses.

At its March 28, 2019 planning meeting, at item 6.1, a resolution was passed whereby the R.M. of Springfield “agrees with the recent reclassification of peat moss by the Manitoba Government as an agricultural product.” The source of that information is not disclosed.

Our understanding is that the Manitoba Government had not recently reclassified peat moss as an agricultural product. Therefore, in an apparent attempt to address the fact that the Manitoba Government did not consider peat moss as an agricultural product, at its April 25, 2019 planning meeting, at item 7, the R.M. of Springfield purported to amend its Zoning By-Law, by resolution 19-195: “that the definition of agricultural activities within the Springfield Zoning By-Law be amended to include peat moss.”

Pursuant to *The Planning Act* (Manitoba), zoning by-laws and amendments to zoning by-laws are required to made by a by-law (not a resolution) and following a public hearing process. Section 57 of *The Planning Act* (Manitoba) expressly provides that this process applies to an amendment. As such, it does not appear that the processes in *The Planning Act* (Manitoba) were followed for the amendment referred to above and residents have been denied the opportunity to a public hearing.

In addition, pursuant to section 62(2) of *The Planning Act* (Manitoba), an amendment to a zoning by-law must be generally consistent with provincial land use policies. We refer you to the Provincial Planning Regulation – specifically Policy Area 8: Mineral Resources. Peat moss harvesting and operations are referenced in Policy Area 8: Mineral Resources. The definition of “agricultural operation” in this Regulation does not reference peat moss.

As such, we submit that, notwithstanding the efforts of the R.M. of Springfield, the site on which the Development is to be constructed is not properly zoned for the proposed use and could be subject to potential legal challenges.

5. Property Values:

Once Berger is in full operation, local residential property values may be adversely impacted. For the reasons noted above, if the Development does proceed, life in the immediate area could be less safe and less pleasant. This could have an negative affect on the market value of our properties. Qualified appraisers representing residents will be required to review the impact of this large commercial operation.

6. Report Prepared by Berger is Insufficient:

With respect, the report included with the Proposal is insufficient and deficient in many respects. It appears to have been prepared in-house by an employee of Berger. No qualifications of the person who prepared the report are listed.

While Berger did retain Friesen Drillers to provide advice regarding hydrological matters, the Friesen report dated March 20, 2020 was prepared with the sole purpose of providing Berger with guidance on the feasibility of constructing their two proposed wells. The Friesen report does not include any analysis of the risks that the Development may pose to the local community. In addition, we note that the disclaimer on page 13 of their report heavily limits the right of Manitoba Conservation (and any person other than Berger) to rely on their report.

Likewise, the materials from Stantec Consulting and HLC Consulting that are attached to the Proposal also appear to be informational in nature and do not include any analysis of the potential risks associated with the Development.

To state the obvious, Berger cannot be relied upon to prepare an impartial environmental assessment of its own Development. Berger's motivation in preparing the report included with its Proposal is to ensure that the Development proceeds. Berger's actions to date lead us to conclude that they have a casual approach when it comes to following the rules. For example, we understand that they commenced construction without obtaining a building permit and without applying for an Environment Act licence.

As noted above, the assessment that Berger has submitted leaves many questions unanswered. Most importantly, it fails to provide sufficient information on which Manitoba Conservation can base a valid assessment. If Manitoba Conservation relies entirely on this report without further independent scrutiny, it will be guilty of neglecting its duty to protect the environment and the safety of the residents of the Oakwood area.

7. Community Concerns:

For the reasons set out above, this Development is not in the public interest, nor does it have community support. Upon news of the Development becoming known, alarmed residents prepared and circulated a petition expressing their opposition to the Development proceeding. To date, this petition has been signed by 320 area residents. Eight-five percent (85%) of the residents within one mile of the proposed facility have signed the petition.

If this Development is approved by Manitoba Conservation, you may be setting the stage for future conflicts between the community and Berger, and complaints to regulators in connection with the impact of the proposed facility.

CONCLUSION:

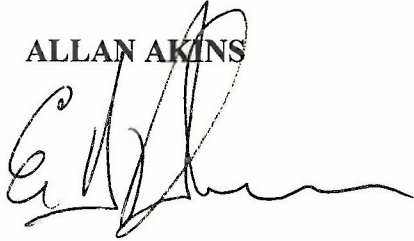
We submit that the Development should not proceed or alternatively, there should be a full public hearing to explore these issues in greater depth and allow for greater public consultation. We urge Manitoba Conservation not to issue an Environment Act licence to Berger for this Development.

We trust that Manitoba Conservation will do the right thing and reject the Berger Proposal or, at the very least, delay the Development until it is approved following a full public hearing.

We appreciate the opportunity to make this submission.

Yours truly,

ALLAN AKINS

A handwritten signature in black ink, appearing to read 'Allan Akins', with a stylized, flowing script.

MARGARET AKINS

A handwritten signature in black ink, appearing to read 'Margaret Akins', with a stylized, flowing script.

www.manitoba.ca

<https://www.gov.mb.sd/eal/registries/6055/index.html>

We request that Public Hearings be held by the Province of Manitoba and the RM of Springfield Council so that we can fully understand how this commercial project, if approved, will affect our quality of life, and what further remedies may be negotiated to have a more positive outcome.

[illegible]

The Names collected on this petition is to notify
Environmental Approvals Branch, Department of Conservation and Climate Government of Manitoba
1007 Century Street, Winnipeg MB R3H 0W4, 204 945-7107 Krystal.Penner@gov.mb.ca
www.manitoba.ca

That we are not in favor of the Environment Act Proposal by Berger Peat Moss Ltd.
<https://www.gov.mb.ca/eal/registries/6055/index.html>

Please be advised we are concerned there currently is not enough information available to Springfield Residents on how the Berger Commercial Packing Plant will affect our quality of life. Air quality, Noise Pollution, Light Pollution, Road Safety and Residents current clean well water & flow rates must remain at their current levels prior to consent being given to move forward. Time must be allowed for Residents to retain engineering and environmental firms to assess the environmental impact as it related to our Community.

We respectfully request the application be deferred to a later date.
We request that Public Hearings be held by the Province of Manitoba and the RM of Springfield Council so that we can fully understand how this commercial project, if approved, will affect our quality of life, and what further remedies may be negotiated to have a more positive outcome.

| NAME | EMAIL | PHONE# |
|----------------------|-------|--------|
| Maurice Vasas | | |
| Alex VASAS | | |
| Emily Vasas - Parent | | |
| Sebastian Bodnar | | |
| Rock Fontaine | | |
| G. L. PARENT | | |
| JOAN PARENT | | |
| Kayla Vasas - Parent | | |
| Matt Meyers | | |
| | | |
| | | |
| | | |

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| NAME | EMAIL | PHONE# |
|-------------------|-------|--------|
| L'ANA RATTAI | | |
| Reinhold Sawatzky | | |
| Nika Sawatzky | | |
| Sarah Johnston | | |
| Darren Johnston | | |
| Linda Sybil | | |
| Kristi Hofer | | |
| Kris Nober | | |
| Siegfried Pajouk | | |
| Tutta Pajouk | | |
| Marie Hunter | | |
| Amber Gibbons | | |

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| NAME | | |
|-----------------|---|--|
| Rob Gauthier |  | |
| [Signature] | | |
| [Signature] | | |
| [Signature] | | |
| Bruce Nicholson | | |
| [Signature] | | |
| [Signature] | | |
| [Signature] | | |
| [Signature] | | |
| Rob Gagne | | |
| AL TOMIUK | | |

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| NAME | EMAIL | PHONE# |
|---------------------|-------|--------|
| Maria Wiebe | | |
| Heinrich Tögers | | |
| Robyn + Sheila Cook | | |
| Neil & Jan Downie | | |
| C. Parkinson | | |
| Vince Roberts | | |
| Danuel Brown | | |
| Leah Brown | | |
| ROBERT THOM | | |
| Valerie Kapke | | |
| Stacie Jennings | | |
| Joel Jennings | | |

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| NAME | EMAIL | PHONE# |
|------------------|-------|--------|
| Donald Ducharme | | |
| Shirley Ducharme | | |
| Corey Parent | | |
| Jennifer Fillion | | |
| Chris Ducharme | | |
| Christine Lam | | |
| Wade Ducharme | | |
| Lauren Hamrick | | |
| Kelly Horvath | | |
| Chris LBN | | |
| E. Maralewski | | |
| Michael | | |

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| NAME | EMAIL | PHONE# |
|-------------------|-------|--------|
| FRED Colucci | | |
| Rawleigh Clements | | |
| Celine Cote | | |
| Amanda Ducharme | | |
| Sarah Singbeil | | |
| GAVIN SHIRTLIFF | | |
| NICK DUCHARME | | |
| Dr. MACTAVISH | | |
| FRANK PROUTY | | |
| Lisa Reimer | | |
| Max Dupas | | |
| JENNIFER KRECK | | |

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| NAME | EMAIL | PHONE# |
|-------------------|-------|--------|
| JOHN SPEER | | |
| RIC BOXER | | |
| PERRY DUCHARME | | |
| DEREK CARMAN | | |
| Denis Bacon | | |
| Karen Lalonde | | |
| Jim Hault | | |
| Ken Brown | | |
| ROLLY TOUGAS | | |
| Ken Stojak | | |
| Henry Pyskal | | |
| Robert MacFarlane | | |

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|----------------|-------|--------|
| Patricia Zogut | | |
| Terese Lawson | | |
| Veronika Sabo | | |
| Nick Lawson | | |
| Frank Solo | | |
| David Lawson | | |
| Bethany Taylor | | |
| Adrian | | |
| Chace | | |
| Gordon Simon | | |

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| NAME | EMAIL | PHONE# |
|-----------------------|-------|--------|
| IDAUNA (ELBIE) BIESHA | | |
| Catherine Booy | | |
| Jen Skelly | | |
| Kevin Skelly | | |
| Glen Johnson | | |
| Monica Chappell | | |
| DIANA SOSNOVSKA | | |
| Alexander Sosnovsky | | |
| Tetyana SOSNOVSKA | | |
| Braden Toet | | |
| ANNA ZARETSKI | | |
| Jason Tower | | |

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|----------------|-------|--------|
| Dave Fast | | |
| Matt Mcsherry | | |
| Dusty Rege | | |
| Gary Campbell | | |
| Zach Joss | | |
| Geil Macdonald | | |
| Kyle Macdonald | | |
| Snah Warrenner | | |
| Don Warrenner | | |
| Kristen Litwin | | |
| Amanda Relf | | |
| Lance Relf | | |

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|------------------|-------|--------|
| Cheryl Edwards | | |
| ROD OWENS | | |
| Kathy Owens | | |
| ROSS OWENS | | |
| Rosera Owens | | |
| Normie Grundmann | | |
| Bunda George | | |
| Fred Savage | | |
| Robert Gouge | | |
| Lynn Gouge | | |
| Robert Poreluzny | | |
| Shonda Poreluzny | | |

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|-----------------|-------|--------|
| JOE KUFFNER | | |
| COLLEEN KUFFNER | | |
| Angela Enns | | |
| Barry Enns | | |
| FRANK VINCI | | |
| GISELE VINCI | | |
| Kylie Wasiuta | | |
| Shelley Demski | | |
| ERIN FUNK | | |
| BRUCE FUNK | | |
| WALLY ZIRK | | |
| LEA ZIRK | | |

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|----------------|-------|--------|
| Darryl SPEER | | |
| K. Howson | | |
| Vince Bennic | | |
| GARY MCCALLUM | | |
| Krystle Cramer | | |
| BH CRAMER | | |
| Heli Giro | | |
| Barb Long | | |
| J. B. O'Leary | | |
| Phil Dobson | | |
| James Farkas | | |
| T. BELL | | |

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|--------------------|-------|--------|
| Peter J. Hanuschuk | | |
| Ashley Costik | | |
| DONAVON GIESBRECHT | | |
| Shane Shumsky | | |
| Shy Vout | | |
| Sharon Vouriot | | |
| GORD FUNK | | |
| Katie Funk | | |
| Ray Bateman | | |
| Donna Jean Bateman | | |
| Ruth Kuchars | | |
| Kelly Humme | | |

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|------------------------------------|-------|--------|
| Amy Deane | | |
| Dylan Campbell | | |
| Marcy Valmoe | | |
| Don Campbell | | |
| Debbie Debbie Campbell | | |
| Jeremy Peabody | | |
| Michael Petrynko | | |
| Debbie Delaney Campbell | | |
| Sam Girden | | |
| Kolten Courtney | | |
| Braden Link | | |
| Trey Fortin | | |

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|-----------------------|-------|--------|
| | | |
| Lisa Douma | | |
| Ray Virginia Zelinsky | | |
| S. M. | | |
| ANOP KUCZYNSKI | | |
| PAT Pat Burbach | | |
| TAMSYN BOUS | | |
| Ronda Turenne | | |
| Marty Turenne | | |
| Donna and Barry Cook | | |
| Barry Cook | | |
| | | |

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|-------------------|-------|--------|
| Jarice Gibbons | | |
| Kevin Gibbons | | |
| Jacob Kolody | | |
| Murray Kolody | | |
| Alex Kolody | | |
| Matt Kolody | | |
| David Wrenn | | |
| Jeff Tutkaluk | | |
| Rachelle Tutkaluk | | |
| GILBERT BLOSTERN | | |
| Nadine C Vasas | | |
| Peg Thom | | |

Berger Petition

08-Jul-20


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|--|-------|--------|
| RALF OZARAK | | |
| Leona Dwzerek | | |
| Petra Pedde | | |
| Rick Pedde | | |
| Angela Neufeld | | |
|  | | |
| Sylvia Camacho Tavares | | |
| Dino Tavares | | |
| Larah Tavares | | |
| Nancy Bodner | | |
| Brittini Dohanne | | |
| MATT AKINS | | |

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|-----------------|-------|--------|
| M. MARION AKINS | | |
| Andrew Booy | | |
| Michelle Booy | | |
| Leonard de Haan | | |
| Suzanne Fiola | | |
| M. Regala | | |
| Maria Bailey | | |
| Linda Kisil | | |
| Gloria Dunian | | |
| Paul Geiger | | |
| John R. R. R. | | |

Blue
-spring

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|---------------------------|-------|--------|
| Courtney Lechman | | |
| Jeremiah Lechman | | |
| Alex Carriere | | |
| Sam Carriere | | |
| George d'Ignia Prudnikova | | |
| Ricardo Teixeira | | |
| HARRY NEESEFOR | | |
| Susan Neesefer | | |
| KELLY + LISA WADE | | |
| WES REDEKOPP | | |
| MARLIA REDEKOPP | | |
| Ken Williams | | |

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|----------------------|-------|--------|
| Michelle [Signature] | | |
| Nathan Bell | | |
| Isabelle Poulin | | |
| Yvonne Kamerman | | |
| Colin Kamerman | | |
| Arnold Kamerman | | |
| Robyn Zeliasky | | |
| Lynda Hunt | | |
| [Signature] | | |
| John E. Sobal | | |
| Linda [Signature] | | |
| [Signature] | | |

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|------------------------|-------|--------|
| Dakota Hunter | | |
| Colton Bost | | |
| HARRY KASCH | | |
| Alan + Elizabeth Koski | | |
| Salvatore + C. Hall | | |
| Mike Hall | | |
| Pina Seestrich | | |
| Jennifer Spruyt | | |
| Al + Jazzy Michael | | |
| Jill | | |
| Linda Jackson | | |

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| L. Baigoh | | |
| Bryan Heckett | | |
| Emily Sitko | | |
| Marya Shufchuk | | |
| J. Shufchuk | | |
| SA Shufchuk | | |
| Shufchuk | | |
| Sandi Tataruk | | |
| Artisim Hutyko | | |
| Kim BERGEN | | |
| Be Berger | | |

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|-----------------------|-------|--------|
| Peter & Blondina Falk | | |
| Bary Sean | | |
| Seamus | | |
| Raf | | |
| Ken & Pal Sonntag | | |
| Lesley Balgosa | | |
| Joe Zaretski | | |
| D. Pennycook | | |
| Paul Dyck | | |
| Margan Young | | |
| Rowan Young | | |
| John B... | | |

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|-------------------|-------|--------|
| Helene E Marsh | | |
| Daryl Marsh | | |
| George Sewelle | | |
| J Burelle | | |
| David Beunw | | |
| Karen Dunn | | |
| Caitlyn Bonneteau | | |
| Bruce Bonneteau | | |
| Ben Dounie | | |
| Neal Dounie | | |
| James P. Mallory | | |
| HLAAR DUN | | |

The Names collected on this petition is to notify

Environmental Approvals Branch, Department of Conservation and Climate Government of Manitoba
1007 Century Street, Winnipeg MB R3H 0W4, 204 945-7107 Krystal.Penner@gov.mb.ca

www.manitoba.ca

That we are not in favor of the Environment Act Proposal by Berger Peat Moss Ltd.

<https://www.gov.mb.ca/eal/registries/6055/index.html>

Please be advised we are concerned there currently is not enough information available to Springfield Residents on how the Berger Commercial Packing Plant will affect our quality of life.

Air quality, Noise Pollution, Light Pollution, Road Safety and Residents current clean well water & flow rates must remain at their current levels prior to consent being given to move forward. Time must be allowed for Residents to retain engineering and environmental firms to assess the environmental impact as it related to our Community.

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| NAME | EMAIL | PHONE# |
|----------------|-------|--------|
| KEITH DIXON | | |
| DEB MOEHRING | | |
| JOHN MOEHKIN | | |
| Mary Beers | | |
| Daryl Beers | | |
| Emily Skrypetz | | |
| Donna Skrypetz | | |
| Karen Watchorn | | |
| Colin Watchorn | | |
| Debra Page | | |
| Daniel Page | | |
| Wilma Geschier | | |

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| NAME | EMAIL | PHONE# |
|-----------------|-------|--------|
| WANDA COMRIE | | |
| Brad Jackson | | |
| Nathalie Buors | | |
| Paul Jackson | | |
| Emilie Buors | | |
| Lauraine Berard | | |
| Rod Berard | | |
| Cheri Jackson | | |
| Brooke Jackson | | |
| Bruce Jackson | | |
| IRVIN JACKSON | | |
| TERRY BARKMAN | | |

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| NAME | EMAIL | PHONE# |
|-------------------|-------|--------|
| Steve Wasiuta | | |
| Cole Wasiuta | | |
| Gloria Wasiuta | | |
| Wayne Hall | | |
| SHEILA TRADY | | |
| Bob Smith | | |
| Ball | | |
| | | |
| | | |
| Larissa Robertson | | |
| Ch. Beckus | | |
| WALTER COMPTON | | |

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[illegible]

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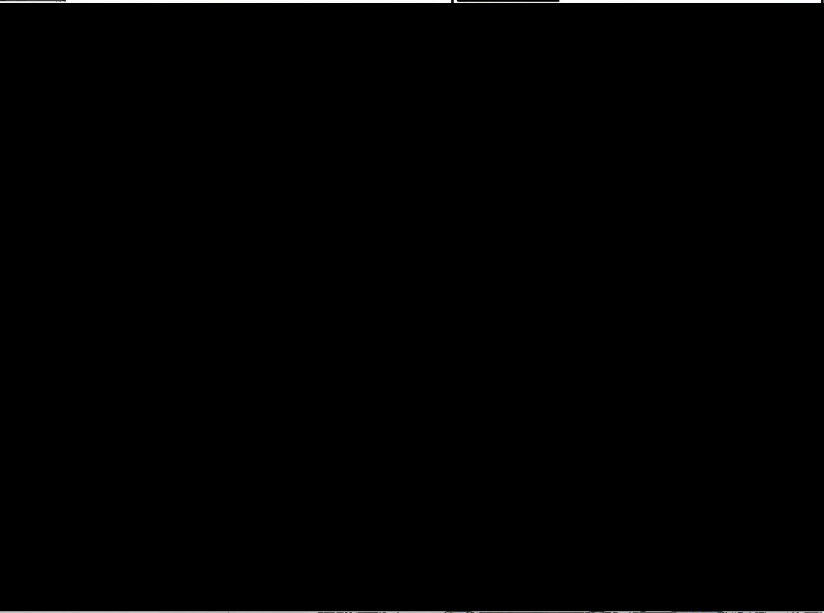



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| NAME | EMAIL | PHONE# |
|--|---|--------|
| Shea Marchuk  |  | |
| Austin Klassen  | | |
| Scott Magnusson | | |
| Bryce Bolin | | |
| Mike Larkin | | |
| Alex Petkau | | |
| Peter Tereck  | | |
| Kristina Manegre  | | |
| | | |
| | | |
| | | |
| | | |

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| NAME | EMAIL | PHONE# |
|---------------|-------|--------|
| Alan Farrell | | |
| off 8-11 | | |
| John | | |
| C. Sussler | | |
| Pe | | |
| NEIL KUYBERS | | |
| Fayre Wolfe | | |
| ALEX BELYAKOV | | |
| John Smith | | |
| | | |
| | | |
| | | |
| | | |

That we are not in favor of the Environment Act Proposal by Berger Peat Moss Ltd.

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[illegible]

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[illegible]