

DATE: August 13, 2026

TO: Public Registry

FROM: Bryce Wood  
Environment  
Officer  
Land Use, Waste  
Management, and  
Energy Section

**SUBJECT: File 6236.00 – Sun Gro Horticulture Canada Ltd. – Sugar Creek Bog Peat Harvesting**

Please find attached the public and technical advisory committee (TAC) correspondence related to Sun Gro Horticulture Canada Ltd. – Sugar Creek Bog Peat Harvesting (file 6236.00) for distribution to the public registries.

Please click the following links to be taken directly to the start of either the public or TAC correspondence that are listed in the tables below:

- [Link for public correspondence](#)
- [Link for TAC correspondence](#)

The documents included are:

| No. | Public Comment                                                         | Date Provided     |
|-----|------------------------------------------------------------------------|-------------------|
| 1   | [REDACTED]                                                             | October 17, 2024  |
| 2   | [REDACTED]                                                             | October 19, 2024  |
| 3   | [REDACTED]                                                             | October 23, 2024  |
| 4   | [REDACTED]                                                             | October 29, 2024  |
| 5   | [REDACTED] forwarding comments from neighbours                         | October 29, 2024  |
| 6   | [REDACTED] for Beaver Creek Cottagers' Association                     | November 12, 2024 |
| 7   | [REDACTED]                                                             | November 13, 2024 |
| 8   | [REDACTED]                                                             | November 13, 2024 |
| 9   | [REDACTED] for Gimli Environmental Advisory Committee                  | November 14, 2024 |
| 10  | [REDACTED]                                                             | November 14, 2024 |
| 11  | [REDACTED]                                                             | November 16, 2024 |
| 12  | [REDACTED]                                                             | November 18, 2024 |
| 13  | [REDACTED]                                                             | November 18, 2024 |
| 14  | [REDACTED]                                                             | November 18, 2024 |
| 15  | [REDACTED]                                                             | November 18, 2024 |
| 16  | [REDACTED]                                                             | November 18, 2024 |
| 17  | [REDACTED] for Little Deer and Mill Creek Beaches cottage subdivisions | November 18, 2024 |
| 18  | [REDACTED] for Mill Creek Community Cottage Association                | November 18, 2024 |

|    |                                                                                                                                                                                                                                                                                                        |                   |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| 19 | <div></div> Pebblestone Beach Residents<br>Note: This comment submission also included one video submitted as several video file parts, which are not posted to the public registry. The video shows 2 minutes and 59 seconds of footage similar to the pictures on page 13 of the comment submission. | November 18, 2024 |
| 20 | <div></div>                                                                                                                                                                                                                                                                                            | November 18, 2024 |
| 21 | <div></div>                                                                                                                                                                                                                                                                                            | November 18, 2024 |
| 22 | <div></div>                                                                                                                                                                                                                                                                                            | November 18, 2024 |
| 23 | <div></div>                                                                                                                                                                                                                                                                                            | November 18, 2024 |
| 24 | <div></div>                                                                                                                                                                                                                                                                                            | November 18, 2024 |
| 25 | <div></div>                                                                                                                                                                                                                                                                                            | November 18, 2024 |
| 26 | <div></div>                                                                                                                                                                                                                                                                                            | November 18, 2024 |
| 27 | <div></div>                                                                                                                                                                                                                                                                                            | November 18, 2024 |
| 28 | <div></div>                                                                                                                                                                                                                                                                                            | November 18, 2024 |
| 29 | <div></div>                                                                                                                                                                                                                                                                                            | November 19, 2024 |
| 30 | <div></div>                                                                                                                                                                                                                                                                                            | November 19, 2024 |
| 31 | <div></div>                                                                                                                                                                                                                                                                                            | November 19, 2024 |
| 32 | <div></div> for Fisher River Cree Nation                                                                                                                                                                                                                                                               | November 19, 2024 |
| 33 | <div></div>                                                                                                                                                                                                                                                                                            | November 20, 2024 |

| No. | Technical Advisory Committee Member                                                                 | Response Provided |
|-----|-----------------------------------------------------------------------------------------------------|-------------------|
|     |                                                                                                     |                   |
| 1   | <b>Environment and Climate Change</b>                                                               |                   |
|     | Environmental Approvals Branch                                                                      |                   |
|     | <ul style="list-style-type: none"> <li>Air Quality Management</li> </ul>                            | No response       |
|     | Environmental Compliance and Enforcement Branch                                                     | January 10, 2025  |
|     | Office of Drinking Water                                                                            | December 5, 2024  |
|     | Drainage and Water Rights Licensing Branch                                                          |                   |
|     | <ul style="list-style-type: none"> <li>Drainage Section</li> </ul>                                  | December 4, 2024  |
|     | <ul style="list-style-type: none"> <li>Water Use Licensing Section</li> </ul>                       | December 4, 2024  |
|     | Water Science and Watershed Management Branch                                                       |                   |
|     | <ul style="list-style-type: none"> <li>Groundwater Management Section</li> </ul>                    | No response       |
|     | <ul style="list-style-type: none"> <li>Water Quality Management Section</li> </ul>                  | January 23, 2025  |
|     | Climate and Clean Technology                                                                        | January 10, 2025  |
|     | Parks Branch                                                                                        | January 17, 2025  |
| 2   | <b>Natural Resources and Indigenous Futures</b>                                                     |                   |
|     | Wildlife Branch                                                                                     | January 17, 2025  |
|     | Fisheries Branch                                                                                    | No response       |
|     | Forestry and Peatlands Branch - Forestry                                                            | January 10, 2025  |
|     | Forestry and Peatlands Branch - Peatlands                                                           | January 9, 2025   |
|     | Lands Branch                                                                                        | January 21, 2025  |
| 3   | <b>Natural Resources and Indigenous Futures (Formerly Business, Mining, Trade and Job Creation)</b> |                   |
|     | Mines Program                                                                                       | No response       |
|     | Petroleum Program                                                                                   | December 4, 2024  |
| 4   | <b>Sport, Culture, Heritage and Tourism</b>                                                         |                   |
|     | Historic Resources Branch                                                                           | January 6, 2025   |
| 5   | <b>Municipal and Northern Relations</b>                                                             |                   |
|     | Community Planning Branch                                                                           | January 9, 2025   |
| 6   | <b>Labour and Immigration</b>                                                                       |                   |
|     | Workplace Safety and Health (Mines)                                                                 | No response       |
| 7   | <b>Health, Seniors and Long-Term Care</b>                                                           |                   |
|     | Environmental Health Unit                                                                           | January 22, 2025  |
| 8   | <b>Transportation and Infrastructure</b>                                                            |                   |
|     | Highway Operations Region                                                                           | No response       |
|     | Roadside Development                                                                                | January 16, 2025  |
|     | Water                                                                                               | January 9, 2025   |
| 9   | <b>Impact Assessment Agency of Canada</b>                                                           | No response       |

From: [REDACTED]  
Sent: Thursday, October 17, 2024 7:04 PM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Subject: Sugar Creek EAP

Hi Bryce

We are reaching out to voice our concerns with the proposed Sugar Creek Plans. Environmental side effects aside: R234 is barely driveable lately and with the amount of Peat Moss trucks on it-where is the funding going to come from to get that road repaired? The mining simply ruined Lake Winnipeg and the whole area. Shores are often covered with the black moss remnants making entering the water and using the shore line simply not possible. Wildlife is gone. Instead of looking at the beautiful trees: we are driving by bare fields on a regular basis. This is just heartbreaking.

We do not support any mining in the area.

[REDACTED]



From: [REDACTED]  
Sent: Saturday, October 19, 2024 11:18 AM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Subject: No peat bog destruction

I object to the Sugar Creek Bog Peat Harvesting proposal from Sun Gro Horticulture Canada. First of all, I feel that this proposal is deceptively titled. This is no more of a 'harvest' than mining for coal or sand. The peat will not grow back. The word 'recover' could just as easily and accurately be replaced with the descriptor 'destroyed'. The project title is simply a mask for another bit of environmental destruction that puts short term profit ahead of preservation of an endangered environmental asset. That belongs to every Manitoban of today, as well as all the generations to come. Make no mistake. The unique and rare natural habitat of the Sugar Creek Bog will be destroyed. Sun Gro Horticulture Canada will leave future generations of Manitobans with a missing piece of what is now, our shared environment. Sugar Creek Bog took thousands and thousands of years to create. It is our shared responsibility to protect these irreplaceable pieces of our environment. Let's not trade this jewel of the natural heritage we all share, for a few years of profits for a few.

[REDACTED]

From: [REDACTED]  
Sent: Wednesday, October 23, 2024 9:38 PM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Subject: File No. 6236

[REDACTED]

MB Envir. and Climate Change should not be considering any proposal to excavate peat for any reason, since it is a major source of methane and CO2.

[REDACTED]



From: [REDACTED]  
Sent: Tuesday, October 29, 2024 10:10 PM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Subject: FW: Sugar creek peat moss expansion.

Good evening; I am a cabin owner at Leaside beach (Little Bullhead) north of Pine Dock. We have owned our place for 27 years. I have attached picture of how our beach has been and how we kept it maintained for all those years. I have also attached a picture of hiring a loader recently to try and mitigate the buildup of peat moss and tried burying it to no success. I have attended meetings about future developments and the peat moss companies continued excuses that this buildup is not their fault. Or that the continued destruction of PR 234 is not caused by these operations. All of these claims are false and we all know this to be true.

Please accept this to be total opposition to any future development and expansion of Peat moss farming in the area until they learn how to contain the peat on the sites. And not draining from their sediment ponds down the creek into the lake right beside my cabin. I have walked this creek to their ponds and there can be no denial yards of peat float down the creeks into the lake.

The road speaks for itself. It was never built with the intention of hauling the weights it's been asked to carry and no topping of red river clay gravel will be able to sustain these loads.

I am also going to forward you other emails from my neighbors.

[REDACTED]

[REDACTED]











The challenging aspect of the situation is that it seems that so many of these rights have been granted to these companies without the proper initial environmental assessments that should have been undertaken and notice given including as I understand it to Peguis and Fisher River.... You probably have a much better sense of the background here but this is important moose habitat and an important ecological area which is essentially being destroyed incrementally. I'm not just sure of what you these two first Nation communities are taking in relation to this additional request. But I expect they may have something to say... I presume they are involved

Like my brother [REDACTED] said I respect the fact that there are people in the community that are benefiting from employment and work and I fully respect that. But as he said everyone has a common interest in making sure that these operations are being run commensurate with appropriate oversight responsibilities being exercised by these companies, and by the contractors who are in charge of maintaining the road, especially in light of the potentially hazardous circumstances that could be created in any fire situation, and the overriding responsibility of the problems. If there were a peat fire and it were to begin smouldering out-of-control that would profoundly impact the entire accessibility of both the companies and the communities for a potentially very long period

What I was trying to do my questions was to implicitly link risk considerations in relation to these operations and the integrity of the road. Whatever rights may have been given and I'm not sure that we have any understanding to this day as to what the nature of these leases are, there are still a range of possible areas where the province should be exercising oversight, and their ability to do so and respond to any emergency situations that would arise depends on the status of the road and the accessibility of any necessary equipment to deal with the situation.

We have already had one fire that took out a cottage at Beaver Creek as I gather. But what should be up monumental concern is the possibility that a peat fire would develop which would continue to drill down further and drown the whole region in smoke. This is a well-known characteristic of peat fires. There was 1 Just outside of Riverton 15 or 20 years ago when it burned for a long time with smoke impacting the highway. So what I was trying to do was to open up a conversation about that which was clearly within what I expect should be provincial oversight responsibilities and the road. So please understand the questions in that context

I.e.1. Please advise as to from whom , and in what Department copies of the Leases can be requested and obtained. If your department is not aware of the answer to this, please have your DM send this request to the appropriate Ministry.

2. Were environmental assessment completed prior to the lease being granted, or activities pursuant to them begun? Where can the outcomes of them be obtained. As per above this may need to be directed to your DM. What implications were identified specifically in relation to wildlife habitat, the creeks and the lake.

3. When and by whom were access roads authorized off PR234 to the peat operations? Are all requirements in terms of signage and pull off lanes being met? What consideration was given to the interests of other landowners along the road in the siting of the access roads? In the case of Leaside it seems incredible given the size of the operation that it would be almost immediately proximate to the cottage area, and our own access road.

4. What fire prevention equipment and procedures are in readiness by the Province? What are the requirements on the companies in this regard? I see on the operation in Mill Creek emergency warning signs about severe fire hazards. Given the depth of the peat there, immediately along the road to reach clay in the 50's they dug 15 feet, but I understand from local friends of mine it may be as much as 30 feet. If fire were to next in that peat the Province would have a nightmare on its hands for potentially years in trying to bring it under control and the smoke that would drown the area and come along with dust. Has that risk been factored into the Highway budgets?

5. What is the annual maintenance budget on the road , and what has it been for the last 5 years. Has it been increased since these operations began .

6. Who is the contractor that is responsible for the maintenance of the road and what is the nature of their equipment and operations? Where else do they work under contract to highways? What is their performance record? In terms of quality and timeliness of the service? You mentioned that they were behind in their responsibilities this year – why and what has been done to respond to that?

7. What are the weight restrictions on the vehicles? Are they being complied with by the companies? What oversight is in place to ensure that the trucks are operating within regulatory requirements?

8. What speed restrictions have been imposed on the trucks given that the conditions are so unsafe not only for other user but the drivers themselves. Speed limits are one thing but the obligation is to drive with due care and attention given the conditions on the road. Has monitoring technology been installed on the trucks?

9. Are logs maintained of the number of peat hauling trucks that are on the road daily and weekly and monthly, and are maintenance schedules coordinated to coincide with activity levels? What reporting requirements are on the companies in respect to these operations?

10. Are incident/accident/violation logs maintained both on the road and on site—which is invariably only an indication as who knows how many near misses there may be ,or not reported, including any safety or fire incidents on the mine sites ( anecdotally I have already heard of on fire in a building at one of the operations. I have also heard many stories of people being forced off the road, to intimidated to drive it except at early hours in the morning or late at nights, excessive speed , obnoxious responses when drivers were pursued into the site to lodge a complaint)

11. Has anyone conducted a door to door survey on the experiences people have been subjected to on the road? Have there been any public information sessions ?

12. What are the requirements in terms of restoration and replanting post mining, and mining closure plans to restore the region in so far as possible?

13. When I drove the road a week ago I was met by many of the contractors trucks hauling gravel for the road, themselves moving at very fast speeds and dust billowing around them swallowing me up with a temporary loss of any visibility- what controls are in place in respect to the contractors.

Best regards



[REDACTED]

On Mon, Jun 10, 2024 at 4:52 PM

[REDACTED]

On Wed, Jun 19, 2024 at 9:50 PM [REDACTED] wrote:  
Hi [REDACTED] (and all - note I've added [REDACTED] here as I know this is an issue they're also interested in),

Please accept my apologies for being so late to chime in. We are extremely concerned about the environmental impact of the existing operation and support opposing any proposed expansion. I would be happy to participate in this Friday's meeting (and any meetings after that) but also happy to leave that to you as I see from the email from the Northern Affairs Division that they've asked for the meeting to be with cottage executives and reps only. It's entirely your call as to whether my participation would be useful or appropriate.

My primary concerns about the proposal relate to environmental impacts from a [greenhouse gas emissions](#) standpoint, due to the detrimental impact that peat mining has on [Lake Winnipeg](#), and due to the significant habitat destruction involved. I recently submitted a complaint to the environmental enforcement branch about peat debris across the bay caused by the existing mining operation and received absolutely no response. It is unfortunate that the previous peat mining moratorium in the province expired in 2015. I have seen aerial photos of the mining site closer to Beaver Creek, and they show how vast the expanse of clear cutting at these sites is (see also youtube video linked below).

One thing to note about the original approvals for the sites is that I understand from my previous career as an environmental lawyer (I am still a lawyer but am not called to the bar in Manitoba and cannot provide legal advice on this issue) that many folks at Leaside, Beaver Creek, and elsewhere wrote to the director to object to the projects and, although s 11(10) of the Environment Act requires that if the director receives objections and decides not to hold a public hearing, the director must provide written reasons for his decision, that the individuals I was in contact with back then did not ever receive such written reasons. Had written reasons been provided, any objector would have had the ability to appeal that decision to the Minister pursuant to s 11(10). In my view, we should be voicing our opposition to the proposal and at the very least requesting a public hearing in the alternative.

On the federal side, it appears the Minister [decided](#) last January not to conduct a federal impact assessment of this project which is unfortunate (and because that decision was made over a year ago it likely cannot be challenged at this point). Note that at p17 of the January 2023 [Analysis Report](#) it notes that



the Manitoba Eco-Network and Wilderness Committee (Manitoba) did write to support the designation of the project for a federal impact assessment.

Unless you have any concerns, I propose to reach out to the [Wilderness Committee](#), Manitoba Eco-Network, and the Lake Winnipeg Foundation to see whether any of them are planning on advocating against this proposal given their history of campaigning against peat mining in the province.

Finally, it is worth noting that both [Peguis First Nation](#) and [Fisher River Cree Nation](#) appear to have significant concerns about peat mining in this area. Do you happen to know whether any of the cottager groups have been in contact with them to learn their position on this new proposal?

Thanks very much for taking on this role on behalf of the folks at Leaside.

All the best,

[REDACTED]

On Mon, Jun 10, 2024 at 12:03 PM [REDACTED] wrote:

Gmorning Leaside; Thanks to all who sent information, stories and facts for me to table our concerns on this development. I did this last week via zoom meeting. Really crazy how well we have "stayed under the radar" even to our neighbors. Lol. I have really enjoyed the stories with the history of our bay. Someday we need to write a documentary for future generations of Leasiders. Over the last 34 years I have heard so many different stories as to how the bay got its name I am not sure which one is true? We recently had guests at the Lakehouse and they asked the question and we had to say we did not know! Lol.

Our group, whom is trying to get ahead of any expansion of this industry are looking for any pictures we have of the damaged road, peat moss on beaches, Trucks on road or recordings of the noise they are making to further our Case. Send when you have the opportunity.

Thanks

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: June 7, 2024 2:46 PM

To: [REDACTED]

Cc: [REDACTED]

[REDACTED]

[REDACTED]

**Subject:** Re: Issue for your Attention and Input: Sungro's Proposal for New Sugar Creek Peat Mine and Ramsey Point Peat Mine expansion

[REDACTED] and all,

Thank you and congratulations on taking over for [REDACTED] (and thanks to them for their great work) - and for representing Leaside as our spokesperson. [REDACTED] and I were not at Leaside much for a period of about five years (regrettably), but the last two years we have spent more time, and in particular last year I spent almost two months at Leaside, our piece of northern paradise! We have been Leasiders since 1962 [REDACTED] [REDACTED] [REDACTED] [REDACTED] I have been driving the road for sixty years, and more, as 234 / the north road as we always called it, was the main connection to [REDACTED] [REDACTED] the north basin, the big lake.

In these last two years that we have been back as more loyal Leasiders - we have been stunned, appalled by the extreme adversarial circumstances created by the peat mining operations. There seems to be no respect for the communities - both cottage communities whose existence has depended on the road for more than sixty years - and the historic communities that became connected to 'the south' with the initial building of the road in the 1950's. We only deal with the road for short periods of the year, I cannot imagine traversing it all year!

These peat trucks have destroyed / are destroying the road, no matter how much surface gravel they keep putting on it. The road was not engineered for this level of commercial activity. The south half of the road before Beaver Creek is always the worst because it was literally built through swamp and peat bogs initially in the 50's by draglines, with offtakes towards the lake for drainage. The north half of the road had more stability through the years because there are more limestone rock sections with some swampy areas between. The south part of the road probably got worse when it was rebuilt with scrapers and bulldozers in 70's - but again it was not engineered for the peat operations extent of use of the road. At the same time, the north section of the road past Beaver Creek was never rebuilt, it is generally more stable, but it is narrow, more bush enclosed, never intended for the current commercial use and not safe by any measure proper engineering.

The other stunning issue for [REDACTED] and I on our 'return' to Leaside a couple of years ago - was the placement of the access road within a few hundred yards of our north Leaside entrance. So now every morning starting at 8 am or earlier and all through the day - we hear the tractor trailer trucks throttling up and down leaving and entering the access road! I mean, come on - it's like they purposely built the access road there just to spite the cottagers! It's also a matter of safety where they placed the road, near a rise in the road coming around a corner. They could have just as easily located that access road at least a mile or two away from both the south and the north Leaside entrances!

So a qualifier here - I was born and raised in Riverton - there are certainly sons and daughters of folks that I grew up with that are benefitting from jobs with the peat operations. I am pleased for my friends, and/or

their families that there are likely a variety of good paying jobs with these operations, in relative close proximity to their hometown - they don't have to leave to live in the city, for those that love the rural life.

But we are all stakeholders - the historic communities, the cottage communities, the tourist traveller, the employees of the peat operations and in fact the northern communities along the north part of the lake that also use the road to access towns and the city on the west of the lake, even though there is now a road on the east side of the lake. The road is a disaster - it is a major safety issue - for all stakeholders including the employees of the peat companies!

So where is their responsibility - who negotiated the contract with the peat operations - where is the contract - what are the terms of the contract - what is the financial remuneration to the province - and what are the obligations of the peat companies to the stakeholders that use the road for secondary vacation home access, and more importantly those northern communities that rely upon the road for access to the south, and most importantly for emergency services travelling north. This is or should be public information - the province must have an obligation of disclosure, even a redacted copy of the agreements? My view there should be maximum pressure, including legal process, to force the province to reveal the terms of these agreements. Understanding what (if any!) obligations the peat companies have to the province and stakeholders, would seem to me to be the starting point for negotiations to correct the current 'relationship', and for future consideration of any expanded operations! I mean if they add two more peat mines and/or increase production at existing mines - on a road never engineered and constructed for such level of use - this becomes an even more impossible situation.

Bottom Line - the peat companies and/or the province (responsible for a poorly negotiated agreement) - need to step up and take responsibility for the condition of the road, for the location of access points to the peat mines along the road, for the safe passage corridors in proximity to the access points, for the surfacing material, for the drivers safe operation of the transport trucks. If they want more mines or expanded production at existing mines - any new agreements and all existing agreements need to be negotiated and renegotiated with provision for proper engineering of the road and rebuilding of the road, and safe operations in all regards. Again, the north road 234 was not engineered for its current use!

A starting point would be an independent professional engineering study to determine in light of current and future heavy commercial use of the road, what changes, materials, improvements, rebuilding of the road would be required for safe use - before any consideration of more mines. There are standards for road construction related to use, and presumably liabilities for those responsible for poorly constructed and maintained roads - I would be shocked if north road 234 comes anywhere close to any government standard required for safe use. If the peat companies and the province choose to respect and partner with all stakeholders for safe use and travel on north road 234 - there should be no problem.

My thoughts in response to your request for input, best regards all, 



From: [REDACTED]  
Sent: Tuesday, November 12, 2024 3:33 PM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Cc: [REDACTED]  
Subject: Sun Gro Horticulture Sugar Creek Bog Peat Harvesting File: 6236.00  
Attached are comments from the Beaver Creek Cottagers' Association regarding this application.  
Beaver Creek Cottagers' Association (BCCA)

[REDACTED]

[REDACTED]

[REDACTED]

November 12, 2024

Bryce Wood

Environmental Approvals Branch

Manitoba Environment and Climate Change

Box 35, 14 Fultz Blvd.

Winnipeg, MB R3Y 0L6

Email: Bryce.Wood@gov.mb.ca

Re: Sun Gro Horticulture Canada Ltd-Sugar Creek Bog Harvesting- File 6236.00

Sir:

The Beaver Creek Cottagers' Association represents the 52 families who have cottages within Beaver Creek Provincial Park. We, like other groups, are firmly opposed to the issuance of a licence to Sun Gro to strip mine the boreal forest at Sugar Creek bog.

Greenhouse Gases:

Peat left in its natural state is considered an efficient carbon sink. Peatlands store close to a third of the total carbon found in global soils but cover only 3 % of the world's land base. A fundamental part of the climate solution is keeping carbon in the ground and away from the atmosphere. An important fact is that by harvesting the peat moss we are actually increasing the release of greenhouse gases into our already fragile atmosphere. This has already been studied and we refer the Province to the following:

[Gas Emissions from Canadian Peat Extraction, 1990–2000: A Life-cycle Analysis](#)

Julian Cleary\*, Nigel T. Roulet\*, Tim R. Moore\*

## Abstract

This study uses life-cycle analysis to examine the net greenhouse gas (GHG) emissions from the Canadian peat industry for the period 1990–2000. GHG exchange is estimated for land-use change, peat extraction and processing, transport to market, and the in situ decomposition of extracted peat. The estimates, based on an additive GHG accounting model, show that the peat extraction life cycle emitted  $0.54 \times 10^6$  t of GHG in 1990, increasing to  $0.89 \times 10^6$  t in 2000 (expressed as CO<sub>2</sub> equivalents using a 100-y time horizon). Peat decomposition associated with end use was the largest source of GHGs, comprising 71% of total emissions during this 11-y period. Land use change resulted in a switch of the peatlands from a GHG sink to a source and contributed an additional 15%. Peat transportation was responsible for 10% of total GHG emissions, and extraction and processing contributed 4%. It would take approximately 2000 y to restore the carbon pool to its original size if peatland restoration is successful and the cutover peatland once again becomes a net carbon sink.

Received: February 19, 2004; Revised: May 12, 2004; Accepted: May 21, 2004

AMBIO: A Journal of the Human Environment 34(6):456–461. 2005

doi: 10.1579/0044-7447-34.6.456

Regardless of what the peat industry claims, it would take 2,000 years to restore the peatlands to their original state.

### Sun Gro peat fire:

We, at Beaver Creek, have had a horrible experience caused by Sun Gro. On June 1<sup>st</sup>, 2020, Sun Gro caused a fire that completely destroyed six cottages and severely damaged several others. In the Investigators Report (Beaver Creek Fire 51 22 53 x 96 54 58 Fire 20-304-036 1st June, 2020), it was determined that a tractor used for harvesting, dislodged burning peat, causing the fire.

The residents of Beaver Creek were ordered to evacuate. Provincial Road 234 runs to the north and south only. There is no other way out. Had it not been for the water bombers and the actions of the fire crews, more damage would have been suffered. As it was, we filed insurance claims but were responsible for our individual deductibles. Not once did Sun Gro contact any of our members. It is our collective opinion that they have proven to be poor corporate citizens.

### Semi-trucks on PR 234:

The number of semi-trailers used to haul the peat has magnified in numbers. Considering that there are three huge peat operations and all using huge trucks to haul the peat, it can safely be said that there are well in excess of 150 trucks per day on PR 234. It takes two trips (one empty and one load) to complete a trip. This is a road constructed on a bog. It is not meant to be the Trans-Canada Highway. This new application will only exacerbate this problem. As it is now, there are two graders constantly repairing the road on a daily basis. We have been advised that Sun Gro, along with the other peat companies do not pay any extra fees to assist with road repairs. The trucks are constantly stirring up dust, so much so, that a vehicle encountering one must slow to a stop until the dust dies down. This in itself is a very dangerous thing.

Peat Run-off:

Lake Winnipeg is being degraded due to the peat that is escaping from retention ponds and piling up on the shore. Beaches are covered with peat. Photos of this, we understand, are being forwarded to your office by Pebblestone Beach representatives in their letter concerning the same subject. This never happened prior to these companies operating. In February of 2017, the ditches at Beaver Creek Park were overflowing. According to Environment Canada, the average daily temperature that month was in the minus 20's yet, when we met with government representatives in Gimli, the person responsible for monitoring water quality at the mines told us it was due to spring run-off. And, she kept a straight face while telling us this. The ditches involved all came from the Ramsay Point Sun Gro mine and the entire campground and road was flooded.

Lake Winnipeg is being threatened by these peat mines. The Lake is treasured by many. The commercial fishing industry and the tourism industry, amongst other industries, depend on the Province to make decisions based on the Lake's goodwill.

We urge the Province of Manitoba to deny this application. Should further clarification be required, please do not hesitate to contact us. Thank you for your time and efforts involved in this serious matter.

Original signed

[REDACTED]

[REDACTED]



From: [REDACTED]  
Sent: Tuesday, November 12, 2024 11:01 PM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Subject: EAP 6236.00 Sun Gro Horticulture Sugar Creek Bog Peat Harvesting

Mr. Wood,

I am writing as a concerned citizen to urge you to take immediate action to halt the proposed expansion of peat mining near Lake Winnipeg. As outlined in Sun Gro Horticulture's Environmental Act Proposal (EAP) for the Sugar Creek sub-areas, this project presents serious environmental risks that will impact both our local communities and Manitoba's natural resources for generations to come.

### **Peat Mining and Carbon Emissions**

Peatlands serve as one of the most effective natural carbon sinks on the planet, storing more carbon per hectare than forests. The proposed Sugar Creek peat mine alone is projected to release over 12,201 tons of CO<sub>2</sub> annually—the equivalent of deforesting 6,019 hectares of rainforest over the project's 37-year lifespan. The cumulative effect of all existing and proposed peat mines in the Lake Winnipeg watershed—covering a combined 15,000 hectares—is equivalent to the carbon emissions produced by clear-cutting nearly 120,000 hectares of rainforest. Approving this expansion directly contradicts Manitoba's commitments to climate action and carbon reduction.

### **Wildfire Risk to Local Communities**

Peat mining has already proven detrimental to nearby communities. In 2020, a wildfire near Beaver Creek damaged properties and threatened residents, underscoring the increased fire risks that accompany peat extraction. Despite license conditions intended to mitigate these risks, peat mines have exacerbated fire hazards, and the current EAP does not address sufficient preventive measures. We cannot afford to jeopardize community safety with further expansion.

### **Degradation of Lake Winnipeg**

Lake Winnipeg is already experiencing ecological stress, and peat mining contributes to the problem. The sedimentation ponds and drainage systems in place have been ineffective, as seen by the peat effluent that pollutes lake beaches. This impacts water quality and harms the lake's aquatic ecosystems, which provide vital resources for local communities and wildlife. Allowing additional peat mining along Lake Winnipeg threatens not only our waterways but

also Manitoba's tourism, fishing, and recreational industries that depend on a healthy lake environment.

### **Failure of Reclamation Efforts**

While the proposal promises site reclamation following peat extraction, successful restoration of peatlands to their original carbon-storing capacity remains highly uncertain. Reclamation efforts have repeatedly fallen short in restoring natural ecosystems. Without effective and verifiable restoration methods, the proposed peat mining would lead to permanent environmental damage.

### **Request for Action**

In light of these pressing concerns, I urge you to advocate against the Sugar Creek peat mining expansion and similar projects along Lake Winnipeg. Our province should prioritize sustainable alternatives that preserve Manitoba's natural landscapes and align with our climate commitments.

Please, for the health of our communities, our lake, and our environment, halt the expansion of peat mining along Lake Winnipeg.

Thank you for your attention to this critical issue. I would be grateful for any information on how your office plans to address these concerns.

Sincerely,

[Redacted Signature]

[Redacted Title]

From: [REDACTED]  
Sent: Wednesday, November 13, 2024 5:23 AM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Subject: EAP 6236.00 Sun Gro Horticulture Sugar Creek Bog Peat Harvesting

I am writing as a concerned citizen to urge you to take immediate action to halt the proposed expansion of peat mining near Lake Winnipeg. As outlined in Sun Gro Horticulture's Environmental Act Proposal (EAP) for the Sugar Creek sub-areas, this project presents serious environmental risks that will impact both our local communities and Manitoba's natural resources for generations to come.

Peatlands serve as one of the most effective natural carbon sinks on the planet, storing more carbon per hectare than forests. The proposed Sugar Creek peat mine alone is projected to release over 12,201 tons of CO<sub>2</sub> annually—the equivalent of deforesting 6,019 hectares of rainforest over the project's 37-year lifespan. The cumulative effect of all existing and proposed peat mines in the Lake Winnipeg watershed—covering a combined 15,000 hectares—is equivalent to the carbon emissions produced by clear-cutting nearly 120,000 hectares of rainforest. Approving this expansion directly contradicts Manitoba's commitments to climate action and carbon reduction.

Peat mining has already proven detrimental to nearby communities. In 2020, a wildfire near Beaver Creek damaged properties and threatened residents, underscoring the increased fire risks that accompany peat extraction. Despite license conditions intended to mitigate these risks, peat mines have exacerbated fire hazards, and the current EAP does not address sufficient preventive measures. We cannot afford to jeopardize community safety with further expansion.

Ours' was one that was barely missed by that fire/ We lost a lot of the trees on our property, and our neighbour's cabin burned to the ground.

Please stop this stupidity from happening AGAIN!

[REDACTED]



From: [REDACTED]  
Sent: Thursday, November 14, 2024 12:30 PM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Cc: [REDACTED]  
Subject: Fwd: Peat harvesting license

Begin forwarded message:

**Mr. Bryce Wood,**

We object to issuing a license to Sun Gro Horticulture Canada Ltd. -Sugar Creek Bog  
Peat Harvesting - file # 6236.00

My concerns are environmental.

Harvesting peat is an unsustainable non-renewable resource and contributes to climate change by releasing greenhouse gas emissions like carbon dioxide and methane into the air that have been stored in the peat bog. It contributes to the loss of valuable habitats, disrupts ecosystems and degraded water quality.

The mechanized peat removal has a major ecological impact, stripping away the living layer and subsequently exposing large quantities of peat to oxidation and loss of carbon.

Areas of bog can become degraded as a result of the drastically lowered water table.

Peat is an incredibly important ally in the fight against climate change. It's a rich haven for wildlife, it improves water quality and it helps reduce flood risk. Peatlands release water which is cleaner because peat acts as a filter.

In response to the concerns governments USA, Europe, England and many others are taking steps to ban peat harvesting, environmental organizations and industry stakeholders are taking steps to limit or phase out peat harvesting because the extraction of peat has significant environmental consequences.

Regulations and policies aimed at conserving peatlands and promoting sustainable peat free alternatives are being implemented worldwide.

The project for peat harvesting by Sun Gro Horticulture is on crown land. We are asking the Manitoba government to do a complete environmental study, have their own assessment, as usually companies hire consultants that will be in their favour.

We ask to protect and keep the peat bogs intact.

Be environmentally friendly.

The Manitoba government has declared that the environment is very important and is working to keep the environment healthy. Granting the license to let Sun Gro Horticulture expand and harvest the peat bog is not environmentally friendly.

We object to giving Sun Gro Horticultural a license to harvest peat on crown land.

[REDACTED]  
Gimli Environmental Advisory Committee



**From:** [REDACTED]  
**Sent:** Thursday, November 14, 2024 1:01 PM  
**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>  
**Subject:** Sugar Creek bog peat harvesting

I am writing to express my concerns regarding this proposed mining. Environmental concerns and especially the possible discharge into Lake Winnipeg.  
I hope you will listen to the GEAC and have a complete environmental study done ,independent of the interested parties. Thank you

**From:** [REDACTED]  
**Sent:** Saturday, November 16, 2024 5:40 PM  
**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>  
**Subject:** EAP 6236.00 Sun Gro Horticulture Sugar Creek Bog Peat Harvesting

It is with great regret that I learned of the proposed Sugar Creek Bog peat mine. The environmental impacts of peat mining – the release of tons of stored carbons, increased fire hazard, pollution to waterways and the disturbance to the wildlife that depend on peatland habitat, as well as disturbance to local communities, are great. Peatlands are also home to many provincially and/or nationally rare plants and insects.

However lucrative to the Manitoba government, peat mining should be abolished in Manitoba. It is ludicrous to me that peat mining continues in the present age, given all the benefits to wildlife and to humans that peatlands offer, mainly to cater to the every-day gardener/grower even when alternative gardening mediums are available.

SunGro's statement “as an industry leader in sustainable Canadian Sphagnum peat moss, we employ the newest research, developments, and management practices to ensure this valuable natural resource remains plentiful and renewable” is misleading, as peatlands take thousands of years to regenerate and will almost certainly never be as they are at present. Reclamation projects have never been proven to be particularly effective, in the few instances when they have been implemented.

Damage to Lake Winnipeg from effluent is also a real threat. Lake Winnipeg's ecosystem is fragile, and has already been greatly impacted by the increased frequency of algal blooms, and the presence of non-native Zebra Mussels, among other issues.

Peatlands are important to our indigenous peoples for hunting and the cultivation of native plants for medicines, etc. For me, peatlands are magical places full of beauty, and unique flora and fauna.

For the reasons mentioned above, please advocate against the Sugar Creek peat mining expansion. Please protect all our peatlands from degradation, they are too valuable to lose.

Sincerely,

[REDACTED]

**From:** [REDACTED]  
**Sent:** Monday, November 18, 2024 11:54 AM  
**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>  
**Cc:** Premier of Manitoba <premier@manitoba.ca>; Minister of Environment and Climate Change <minecc@manitoba.ca>; Minister of Transportation and Infrastructure <minmti@manitoba.ca>; Minister of Municipal and Northern Relations <minmnr@manitoba.ca> [REDACTED]  
**Subject:** EAP 6236.00 Sun Gro Horticulture Sugar Creek Bog Peat Harvesting

This petition is submitted as a public response to EAP 6236.00 and to request a moratorium on new peat mining (a.k.a. harvesting) licences which expand peat mining operations around Lake Winnipeg.

The change.org petition is attached as a pdf, as well as 765 (and counting) online signatures and comments. The petition can be found online at <https://www.change.org/p/petition-to-halt-the-expansion-of-peat-mining-on-lake-winnipeg>.

Of the 765 signatures, 63% are Manitobans, 25% are Canadians, and the remainder are from outside Canada.

This an overwhelming public response against EAP 6236.00 and peat mining along Lake Winnipeg.

Thank you for your attention to this critical issue. I would be grateful for any information on how your office plans to address these concerns.

Cordially

[REDACTED]





# Petition to Halt the Expansion of Peat Mining on Lake Winnipeg

Started  
Petition to

July 27, 2024  
Tracy Schmidt (Minister of Environment and Climate Change)

765  
Signatures

1,000  
Next Goal

 56 people signed today

Share this petition

## Why this petition matters



Started by [Brock Inahardplace](#)

Stop the Destruction: Protect Lake Winnipeg's Peatlands

Lake Winnipeg's Washow Bay area, a vital ecosystem supporting diverse wildlife and local communities, is under threat from the expansion of peat mining operations. Peat, a non-renewable resource<sup>1</sup>, is being extracted at the cost of our environment and the health of Lake Winnipeg. We call upon the province and responsible authorities to halt the expansion of peat mining by SunGro and other operators to protect Lake Winnipeg.

### Why This Matters:

1. **Lake Winnipeg Pollution:** Peat mining releases stored phosphorus into its runoff, which contributes to algae blooms in Lake Winnipeg. Peat mining degrades water quality by releasing suspended solids and dissolved metals into water bodies. It alters local water tables and drainage patterns, leading to soil erosion and increased sedimentation that harms aquatic life and recreational areas. Peat buildups are already evident on Lake Winnipeg's beaches and shoreline.
2. **Wildfire Risk:** Peat is highly flammable putting local residents at risk of wildfire. Serviced by a single gravel road, [currently in a state of disrepair](#), several Lake Winnipeg communities have no escape route. When [wildfires occurred in June 2020](#)<sup>2</sup>, many cottages were lost or damaged.
3. **First Nations Impact:** Fisher River FN and Peguis FN have expressed concerns over the environmental impact and infringement of Aboriginal and Treaty Rights
4. **Environmental Devastation:** Peatlands are rich ecosystems that support a wide variety of plant and animal species. Peat mining destroys these habitats, leading to significant biodiversity loss and disruption of critical ecosystem services like water regulation, carbon storage, and flood mitigation. Lake Winnipeg peat mines are currently strip mining in a moose conservation area where moose populations have significantly decreased.
5. **Climate Change:** Peatlands act as major carbon sinks, storing immense amounts of carbon. Mining releases this stored carbon into the atmosphere, exacerbating greenhouse gas emissions and accelerating climate change. The process of drying and processing peat further increases CO2 emissions.

### Our Demands:

1. **Immediate Moratorium:** Implement an immediate moratorium on new peat mining licenses and the expansion of existing operations in the Lake Winnipeg area.

2. **Sustainable Alternatives:** Promote and support the use of sustainable alternatives to peat, such as typha, composting, and coconut coir, which can provide similar benefits without environmental harm.

## Join Us in Protecting Lake Winnipeg:

By signing this petition, you are standing up for the protection of Lake Winnipeg's precious peatlands and supporting the health and well-being of local communities. Together, we can advocate for sustainable practices and prevent further environmental degradation.

For more information please refer to our [Frequently Asked Questions](#).

## Sign Now to Stop the Expansion of Peat Mining on Lake Winnipeg!

**Share this petition** with your friends, family, and social networks to amplify our call for action. Together, we can make a difference.

### Footnotes:

1. It takes thousands of years to form substantial peat deposits. Due to its extremely slow rate of accumulation, it cannot be replenished on a human timescale, making it non-renewable
2. The Fire Commissioner's [report](#) indicated that the June 2020 Beaver Creek fire was started at the peat mine located ~1km away



Share this petition in person or use the QR code for your own material.

[Download QR Code](#)

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## Decision Makers



**Tracy Schmidt**

Minister of Environment and Climate Change



[illegible]

[illegible]

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|      |      |          |             |         | 2024-08-09 | "Digging out even more of the kidneys of a profoundly sick, contaminated lake is criminally stupid. This is exactly the kind of heedless, thoughtless damage to our lands, waters, and ecosystems that we have to STOP committing, not increase it. Plus, of course, all the important issues already" |
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|      |      |          |             |         | 2024-08-23 | "Peat is not needed in compost anymore and these guys can figure something else out. Its time we caught up here in Canada." |
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[illegible]

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From: [REDACTED]  
Sent: Monday, November 18, 2024 4:32 PM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Subject: Protest Letter, Sugar Creek Bog Peat Harvesting, File 6236.00

Dear Mr Wood,

Please find attached our letter of submission provided in protest and opposition to the proposed Sun Gro Horticulture Canada, Sugar Creek Bog Peat Harvesting development, submitted as required by today's date, November 18, 2024.

I would be pleased to speak with you in greater detail with regards to the attached letter.

Thank You, [REDACTED]



[LinkedIn](#) | [WHY Video](#)

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Delivered: November 18, 2024  
By Email to: [Bryce.Wood@gov.mb.ca](mailto:Bryce.Wood@gov.mb.ca)

Bryce Wood Environmental  
Officer  
Environmental Approvals Branch  
Manitoba Environment and Climate Change Box  
35, 14 Fultz Boulevard  
Winnipeg, MB R3Y 0L6 Dear

Sir:

Re: By this letter to the Province of Manitoba's Environmental Approvals Branch with respect to Sugar Creek EAP (File No 6236.00) - We protest and oppose the proposed Sun Gro Horticulture Canada proposal to construct and operate a peat harvesting development at the Sugar Creek bog. Given significant existing peat operations along Hwy 234, related heavy commercial vehicular traffic, and catastrophic unresolved dangerous issues with Highway 234, approval of any additional peat operations that significantly increases heavy truck traffic on Highway 234 is some kind of insanity! Unless and until Hwy 234 is completely reengineered and rebuilt to safely accommodate the heavy-duty commercial activity of existing and proposed peat operations - no new peat mining operations should be approved.

My wife [REDACTED] and I are members of the cottage community that has grown significantly over the past sixty years along the west shores of Lake Winnipeg from Beaver Creek to Matheson Island. My parents, [REDACTED], built their cottage at Leaside Beach [REDACTED]  
[REDACTED]  
[REDACTED]

By some accounts there are more than 250 cottage properties from Beaver Creek to Island View at the end of the road, including Beaver Creek, Mill Creek, Little Deer, Pebblestone, Leaside and Island View beaches, and as many as 42 and 93 private dwellings at Pine Dock and Matheson Island respectively. In addition, there are seasonal fishing operations based out of camps and infrastructure at Frog Bay, Calder's Dock and other locations along Hwy 234. All those property owners, both residents, seasonal residents and fishers, have made significant investments in the original construction of their properties, and continue to make significant contributions to the local Interlake communities of Riverton, Arborg, Gimli and others annually, with respect to purchases of goods and services. Also, the fishers contribute significant additional seasonal economic activity to the Province of Manitoba.

Tens of millions of dollars have been invested by those property owners on initial cost of construction and ongoing costs of ownership. The average cost per square foot to build a cottage in Manitoba is reported to be as much as \$350/sf, with the average falling around \$200/sf, with range of size reported as 400sf to 2000sf. As such at least \$50 million would have been the minimum total initial investment by 250 cottage owners for average 1000sf cottage (250 x 1000sf x \$200/sf), and with the higher cost of northern construction perhaps as much as \$87.5 million at \$350/sf. On similar basis at least \$14 million (70 X 1000sf x \$200/sf), and as much as \$24.5 million at \$350/sf would have been invested by the residents of just the reported 'occupied dwellings' of Pine Dock and Matheson Island. *[In the 2021 Census of Population conducted by Statistics Canada, Pine Dock had population of 38 living in 18 of its 42 total private dwellings, and Matheson Island had a population of 136 living in 52 of its 93 total private dwellings, Wikipedia.]*

As to the seasonal residents, the Government of Manitoba sold them their properties, obligated them to construct approved buildings within a certain time period, and by doing so implicitly promised property rights that would rightly include safety, access and certain services. The historic communities of Pine Dock, Matheson Island and the seasonal fisher communities share the same expectations. Whereas the Province of Manitoba is receiving

some amount of economic contributions from the peat operations, the long-time existing cottage communities, the settlements at Pine Dock, Matheson Island and seasonal fishers have made very significant investments, collectively much more than \$100 million by the conservative estimates above. We the property owners along Hwy 234 have contributed significantly to the Province of Manitoba, to the Interlake community-we have rights too!

I have travelled on Hwy 234, 'the north road' as my family calls it, for my entire life as I grew up in Riverton, and my extended family was involved in the Lake Winnipeg fishing business for over a hundred years. Our family operated multiple fishing stations throughout Lake Winnipeg, including extensively the north basin. Our freight boats [REDACTED] used to deliver fish to the pier at Island View, where it was loaded onto transport trucks for delivery to the FFMC in Winnipeg. I have traveled Hwy 234 countless times in connection with the family fishing business, as well as to the family cottage [REDACTED] [REDACTED] [REDACTED] [REDACTED]

The last two years my wife [REDACTED] and I have spent more time at our cottage, more than five months in total, primarily July, August and into early September. During that time, we have been stunned, appalled, devastated by the extreme adversarial and increasingly dangerous vehicular conditions created by the peat mining operations. There seems to be no respect for the communities by the Government of Manitoba or the peat mining companies - both the seasonal cottage communities, whose existence has depended on the road, from the first cottages built along the road more than 60 years ago - and the historic communities of Matheson Island and Pine Dock, the fishing camps and the many northern Lake Winnipeg communities that were connected to 'the south' with initial building of the road in the 50's.

Highway 234 was never engineered for extreme commercial use by the heavy-duty transport trucks required for the peat operations. The peat trucks have destroyed / are destroying the road, and no amount of periodic surface gravel and repair improves the conditions, other than for one or two days. The section of the road from Sugar Creek to Beaver Creek has always been the worst because it was literally built through swamp and peat bogs by draglines in the 1950's, and mostly too close to the lake. Although the entire south part of the road to Beaver Creek was rebuilt and widened, reality is it made the road worse because it was rebuilt with existing material, rather than with new heavy aggregate. The section from Sugar Creek to Beaver Creek should have been relocated further from the lake to the west and/or it should have been rebuilt like the Hecla causeway with very heavy limestone aggregate! Although north half of the road, from Beaver Creek to Island View has been more stable through the years (more limestone rock sections), and never rebuilt, it is very hazardous because it is narrow and enclosed by bush, resulting in many 'blind' curves where oncoming traffic is not visible until the last moment. Highway 234 is not safe for residential (or commercial) traffic by any measure of professional road engineering!

As to the specific problems that have been created by the peat operations along Hwy 234, that [REDACTED] experienced (and similarly other members of our cottage community have reported), they are as follows:

- The road is treacherous and periodically almost completely impassable. The large heavy peat transport trucks bounce on the rutted road, making long stretches of very

large potholes and abscesses in the road. Even after gravel is applied and the road graded, within one or two days of the heavy transport trucks pounding the road it becomes severely rutted again, and it gets completely destroyed by heavy rain.

- The heavy peat transport trucks are dangerous, particularly on the northern portion of the road past Beaver Creek where the road narrows significantly, with overgrown brush and 'blind curves', whether meeting head-on or following behind.
- Meeting the peat transport trucks, or following behind, stones are frequently thrown up by the transport truck tires onto wind shields, especially after fresh gravel.
- During periods of drier weather the peat transport trucks produce enormous dust clouds that hang in the air and don't dissipate, both on the wide dusty gravel south portion, and on the narrow northern portion with many 'blind curves' - such that when driving and fully enveloped by the dust clouds, you have to slow to a crawl, but dare not for not knowing if more transport trucks are bearing down behind you.
- Hwy 234 becomes extremely dangerous during those periods when the road is being repaired - where large semi-trailer dump trucks are laying down gravel, one or two graders are spreading the gravel- heavy peat transport trucks are coming and going, as well as other vehicular traffic - and you are forced to continue in zero visibility for long stretches, where slowing is hazardous and stopping not an option.
- There are now several peat operations along Hwy 234, with access/egress to the peat operations mostly on the west, but some also on the east side of the road, where the large peat trucks entering onto Hwy 234 are very hazardous when the air is thick with dust clouds.

As a result of the extreme treacherous conditions created by the peat operations along Hwy 234, our personal safety, damage to vehicles, value of our property and quiet enjoyment of our cottage has been very significantly impacted as follows:

- Three years ago I used my lighter SUV [REDACTED] travel to and from our cottage. When transitioned off the gravel road and onto pavement the vehicle vibrated so badly that I had to stop at KAL Tire, where it took the mechanics three hours to remove the concrete-like limestone gravel/dust (and perhaps dust inhibitor chemical) from my wheels, that was causing the imbalance.
- The past two years I have been driving a [REDACTED] and last summer I blew out the CV joint on one of my front wheels, requiring a complete rebuild including the wheel bearing, for cost of \$1,000. Fearing the other CV joint and wheel bearing had been degraded by constant hammering on severe ruts and potholes I proactively replaced the other front wheel CV and bearing for added \$1,000 cost.
- It is dangerous driving Hwy 234 at any time, and advisable to only do so with a large SUV or truck, and certainly inadvisable to do so in any car, especially a small car.



- As a result of the dangerous conditions of Hwy 234, our friends and relatives are reluctant to visit, where cottage life is all about such 'get togethers', and quite frankly we don't want to bear the worry and responsibility of our friends and family risking the safety of their lives, or cost of vehicle damage, especially if not an SUV or truck.
- As a result of the ridiculously dangerous conditions of Hwy 234, created by the peat operations (whether Sun Glo, Sunterra, Berger or any other) and the Province of Manitoba by permitting such operations and allowing life threatening vehicular conditions to exist for travelers along Hwy 234 - the value of our very significant investment in our Leaside Beach cottage has been greatly diminished.

Another stunning issue for [REDACTED] and I and our Leaside neighbors - was the placement of the access road for the Little Bullhead peat mine - located within a hundred or so yards of our north Leaside entrance, on the downside of a curve. The location of that entrance is clearly in violation of road building regulations, due to proximity of the Leaside Beach north access road. Also, every morning starting as early as 7 am and all through the day-we loudly hear the tractor trailer trucks throttle up and down as they access and depart Hwy 234. It's like they built the access road in that location to spite the cottagers, or otherwise with no common courtesy given to our quiet enjoyment! The peat operation access road could just as readily be located a mile or two further north. It is unconscionable!

We leave it to others to protest and oppose any additional peat operation permits because of environmental degradation - other than to comment that we have also been impacted by the black peat sludge that accumulates on the shoreline of Leaside Beach. There is a creek that separates the north and south Leaside Beach subdivisions, that has been observed to carry the peat from the operation across the road to the lake, and there have also been claims that during particularly dry times the peat is carried air borne by prevailing winds from the west into our Leaside Beach bay, and washes onto the sand. Leaside Beach is very special because of its great sand beach, now spoiled by residual peat.

We are all stakeholders - the cottage communities, the historic communities of Pine Dock and Matheson Island, the fisher camps, tourist travelers, and some of the northern Lake Winnipeg communities that also access the road. The road is a total disaster - it is a major life-threatening safety issue - for all stakeholders including the employees of the peat companies! One has to wonder - why would the Province of Manitoba have entered into agreements with the peat companies without incorporating into such agreements the cost of rebuilding the road and/or the province undertaking to properly reengineer and rebuild the road for what they would have known to be such a major requirement!?

In summary, we reiterate our protest and opposition to the approval and permitting of any new peat operations along Hwy 234 by any peat company- until the Province of Manitoba and/or the peat companies undertake the complete reengineering and rebuild of Hwy 234. Hwy 234 must be rebuilt just for current circumstances, where the Province of Manitoba should never have permitted the extent of the existing peat operations - and where it was clearly known that the road was never engineered for such extreme commercial use.

As referenced, the residents, seasonal residents and fishers have contributed greatly to the economy of the Interlake and the Province of Manitoba, by much more than \$100 million of initial investment by very conservative estimate, and likely hundreds of thousands if not millions more every year. We deserve consideration for our contributions, as we are very significant stakeholders, with long term permanent contributions that are far greater than the peat companies that are opportunistically exploiting resources with egregious consequences to all other Hwy 234 stakeholders.

We would be pleased to speak directly with you about any of the information presented in our letter in support of our opposition and protest against any further peat permits.

Very Truly Yours,

A black rectangular redaction box covering the signature area.

From: [REDACTED]  
Sent: Monday, November 18, 2024 7:50 PM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Subject: Sugar Creek

Dear Mr. Wood,

I have just reviewed my brother [REDACTED] letter to you, attach below and want to confirm all of the information in it and to fully endorse his views about the totally inappropriate nature of any expansion of this facility, for all of the reasons he indicates.

I have written in past years, extensive letters to the Ministry in connection with the road, and these operations, particularly highlighting some of the safety considerations both with respect to potential hazards existing from these kinds of operations and the dangerous conditions on the road.

I have literally been on this road from its first vehicular traffic in 1955. I know this road like few could, and never could I have imagined that all these years later, it would be in this deplorable state with the vast amount of industrial activity going on on these lands

It really is astonishing. But the simple reality is that the road was never built,( and the “upgraded” version from Beavercreek South, which was very inadequately designed and constructed through some of the worst bog areas in the 70’s) for this kind of traffic and operation . This portion of the road literally was just papered on top of the bog with no borrow pits to provide a solid foundation. Graveling this road as I saw yet again this summer is like throwing a layer of dust on it.

In earlier years, there was at least a greater permanently located on that road with a wonderful man from Riverton operating day in and day out. That does not even happen now and they’re simply called out on I guess an as required basis.

The simple reality is that if a significant fire where to happen in one of these operations, it would be almost impossible to extinguish, and the smoke generated would make the road essentially impossible all the more so when combined with the dust

i have work globally with respect, a large mining operations and their interface with communities, and I have never seen a circumstance, no matter what part of the world I have been in, for an operation of this magnitude to operate without substantial infrastructure and community support by the companies.

My final point is this. The environmental assessment to what extent are carbon emissions being taken into account and reckoned with in terms of the overall responsibility that Manitoba and Canada has in terms of our treaty commitments on climate change. This is a vast area. There must be a huge amount of carbon emissions that are generated daily and I would very much like to know what those numbers are because those are definitely pertinent in any environmental assessment in today’s context.

For years, I practice lawn in Winnipeg and was a founding partner of Taylor McCaffrey. I have done extensive work in the province, dealing with indigenous and environmental issues from the early 70's

I am still bewildered at the fact that when these licenses were granted, apparently no notice was given, and I certainly was not aware until many years later from their granting that this potential was in the offing

Thank you very much for your attention to this. I'm happy to speak to anybody at any time at any level anywhere within the province or federally or any first nation communities that have an interest in this directly.

I would be prepared to participate in a Zoom call on this or if necessary flight to Winnipeg to make an appearance before body that is charged with responsibility of dealing with this

Yours truly

[REDACTED]

[REDACTED]

[REDACTED]

Delivered: November 18, 2024  
By Email to: [Bryce.Wood@gov.mb.ca](mailto:Bryce.Wood@gov.mb.ca)

Bryce Wood Environmental  
Officer  
Environmental Approvals Branch  
Manitoba Environment and Climate Change Box  
35, 14 Fultz Boulevard  
Winnipeg, MB R3Y 0L6 Dear

Sir:

Re: By this letter to the Province of Manitoba's Environmental Approvals Branch with



respect to Sugar Creek EAP (File No 6236.00) - We protest and oppose the proposed Sun Gro Horticulture Canada proposal to construct and operate a peat harvesting development at the Sugar Creek bog. Given significant existing peat operations along Hwy 234, related heavy commercial vehicular traffic, and catastrophic unresolved dangerous issues with Highway 234, approval of any additional peat operations that significantly increases heavy truck traffic on Highway 234 is some kind of insanity! Unless and until Hwy 234 is completely reengineered and rebuilt to safely accommodate the heavy-duty commercial activity of existing and proposed peat operations - no new peat mining operations should be approved.

My wife [REDACTED] and I are members of the cottage community that has grown significantly over the past sixty years along the west shores of Lake Winnipeg from Beaver Creek to Matheson Island. My parents, [REDACTED]

By some accounts there are more than 250 cottage properties from Beaver Creek to Island View at the end of the road, including Beaver Creek, Mill Creek, Little Deer, Pebblestone, Leaside and Island View beaches, and as many as 42 and 93 private dwellings at Pine Dock and Matheson Island respectively. In addition, there are seasonal fishing operations based out of camps and infrastructure at Frog Bay, Calder's Dock and other locations along Hwy 234. All those property owners, both residents, seasonal residents and fishers, have made significant investments in the original construction of their properties, and continue to make significant contributions to the local Interlake communities of Riverton, Arborg, Gimli and others annually, with respect to purchases of goods and services. Also, the fishers contribute significant additional seasonal economic activity to the Province of Manitoba.

Tens of millions of dollars have been invested by those property owners on initial cost of construction and ongoing costs of ownership. The average cost per square foot to build a cottage in Manitoba is reported to be as much as \$350/sf, with the average falling around \$200/sf, with range of size reported as 400sf to 2000sf. As such at least \$50 million would have been the minimum total initial investment by 250 cottage owners for average 1000sf cottage (250 x 1000sf x \$200/sf), and with the higher cost of northern construction perhaps as much as \$87.5 million at \$350/sf. On similar basis at least \$14 million (70 X 1000sf x \$200/sf), and as much as \$24.5 million at \$350/sf would have been invested by the residents of just the reported 'occupied dwellings' of Pine Dock and Matheson Island. *[In the 2021 Census of Population conducted by Statistics Canada, Pine Dock had population of 38 living in 18 of its 42 total private dwellings, and Matheson Island had a population of 136 living in 52 of its 93 total private dwellings, Wikipedia.]*

As to the seasonal residents, the Government of Manitoba sold them their properties, obligated them to construct approved buildings within a certain time period, and by doing so implicitly promised property rights that would rightly include safety, access and certain services. The historic communities of Pine Dock, Matheson Island and the seasonal fisher communities share the same expectations. Whereas the Province of Manitoba is receiving some amount of economic contributions from the peat operations, the long-time existing

cottage communities, the settlements at Pine Dock, Matheson Island and seasonal fishers have made very significant investments, collectively much more than \$100 million by the conservative estimates above. We the property owners along Hwy 234 have contributed significantly to the Province of Manitoba, to the Interlake community-we have rights too!

I have travelled on Hwy 234, 'the north road' as my family calls it, for my entire life as I grew up in Riverton, and my extended family was involved in the Lake Winnipeg fishing business for over a hundred years. Our family operated multiple fishing stations throughout Lake Winnipeg, including extensively the north basin. Our freight boats [REDACTED] used to deliver fish to the pier at Island View, where it was loaded onto transport trucks for delivery to the FFMC in Winnipeg. I have traveled Hwy 234 countless times in connection with the family fishing business, as well as to the family cottage since [REDACTED] [REDACTED] [REDACTED]

The last two years my wife [REDACTED] and I have spent more time at our cottage, more than five months in total, primarily July, August and into early September. During that time, we have been stunned, appalled, devastated by the extreme adversarial and increasingly dangerous vehicular conditions created by the peat mining operations. There seems to be no respect for the communities by the Government of Manitoba or the peat mining companies - both the seasonal cottage communities, whose existence has depended on the road, from the first cottages built along the road more than 60 years ago - and the historic communities of Matheson Island and Pine Dock, the fishing camps and the many northern Lake Winnipeg communities that were connected to 'the south' with initial building of the road in the 50's.

Highway 234 was never engineered for extreme commercial use by the heavy-duty transport trucks required for the peat operations. The peat trucks have destroyed / are destroying the road, and no amount of periodic surface gravel and repair improves the conditions, other than for one or two days. The section of the road from Sugar Creek to Beaver Creek has always been the worst because it was literally built through swamp and peat bogs by draglines in the 1950's, and mostly too close to the lake. Although the entire south part of the road to Beaver Creek was rebuilt and widened, reality is it made the road worse because it was rebuilt with existing material, rather than with new heavy aggregate. The section from Sugar Creek to Beaver Creek should have been relocated further from the lake to the west and/or it should have been rebuilt like the Hecla causeway with very heavy limestone aggregate! Although north half of the road, from Beaver Creek to Island View has been more stable through the years (more limestone rock sections), and never rebuilt, it is very hazardous because it is narrow and enclosed by bush, resulting in many 'blind' curves where oncoming traffic is not visible until the last moment. Highway 234 is not safe for residential (or commercial) traffic by any measure of professional road engineering!

As to the specific problems that have been created by the peat operations along Hwy 234, that Wendy and I have experienced (and similarly other members of our cottage community have reported), they are as follows:

- The road is treacherous and periodically almost completely impassable. The large heavy peat transport trucks bounce on the rutted road, making long stretches of very large potholes and abscesses in the road. Even after gravel is applied and the road

graded, within one or two days of the heavy transport trucks pounding the road it becomes severely rutted again, and it gets completely destroyed by heavy rain.

- The heavy peat transport trucks are dangerous, particularly on the northern portion of the road past Beaver Creek where the road narrows significantly, with overgrown brush and 'blind curves', whether meeting head-on or following behind.
- Meeting the peat transport trucks, or following behind, stones are frequently thrown up by the transport truck tires onto wind shields, especially after fresh gravel.
- During periods of drier weather the peat transport trucks produce enormous dust clouds that hang in the air and don't dissipate, both on the wide dusty gravel south portion, and on the narrow northern portion with many 'blind curves' - such that when driving and fully enveloped by the dust clouds, you have to slow to a crawl, but dare not for not knowing if more transport trucks are bearing down behind you.
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As a result of the extreme treacherous conditions created by the peat operations along Hwy 234, our personal safety, damage to vehicles, value of our property and quiet enjoyment of our cottage has been very significantly impacted as follows:

- Three years ago I used my lighter SUV, a [REDACTED], to travel to and from our cottage. When transitioned off the gravel road and onto pavement the vehicle vibrated so badly that I had to stop at KAL Tire, where it took the mechanics three hours to remove the concrete-like limestone gravel/dust (and perhaps dust inhibitor chemical) from my wheels, that was causing the imbalance.
- The past two years I have been driving a heavier Toyota SUV AWD, and last summer I blew out the CV joint on one of my front wheels, requiring a complete rebuild including the wheel bearing, for cost of \$1,000. Fearing the other CV joint and wheel bearing had been degraded by constant hammering on severe ruts and potholes I proactively replaced the other front wheel CV and bearing for added \$1,000 cost.
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- As a result of the dangerous conditions of Hwy 234, our friends and relatives are

reluctant to visit, where cottage life is all about such 'get togethers', and quite frankly we don't want to bear the worry and responsibility of our friends and family risking the safety of their lives, or cost of vehicle damage, especially if not an SUV or truck.

- As a result of the ridiculously dangerous conditions of Hwy 234, created by the peat operations (whether Sun Glo, Sunterra, Berger or any other) and the Province of Manitoba by permitting such operations and allowing life threatening vehicular conditions to exist for travelers along Hwy 234 - the value of our very significant investment in our Leaside Beach cottage has been greatly diminished.

Another stunning issue for [REDACTED] and I and our Leaside neighbors - was the placement of the access road for the Little Bullhead peat mine - located within a hundred or so yards of our north Leaside entrance, on the downside of a curve. The location of that entrance is clearly in violation of road building regulations, due to proximity of the Leaside Beach north access road. Also, every morning starting as early as 7 am and all through the day-we loudly hear the tractor trailer trucks throttle up and down as they access and depart Hwy 234. It's like they built the access road in that location to spite the cottagers, or otherwise with no common courtesy given to our quiet enjoyment! The peat operation access road could just as readily be located a mile or two further north. It is unconscionable!

We leave it to others to protest and oppose any additional peat operation permits because of environmental degradation - other than to comment that we have also been impacted by the black peat sludge that accumulates on the shoreline of Leaside Beach. There is a creek that separates the north and south Leaside Beach subdivisions, that has been observed to carry the peat from the operation across the road to the lake, and there have also been claims that during particularly dry times the peat is carried air borne by prevailing winds from the west into our Leaside Beach bay, and washes onto the sand. Leaside Beach is very special because of its great sand beach, now spoiled by residual peat.

We are all stakeholders - the cottage communities, the historic communities of Pine Dock and Matheson Island, the fisher camps, tourist travelers, and some of the northern Lake Winnipeg communities that also access the road. The road is a total disaster - it is a major life-threatening safety issue - for all stakeholders including the employees of the peat companies! One has to wonder - why would the Province of Manitoba have entered into agreements with the peat companies without incorporating into such agreements the cost of rebuilding the road and/or the province undertaking to properly reengineer and rebuild the road for what they would have known to be such a major requirement!?

In summary, we reiterate our protest and opposition to the approval and permitting of any new peat operations along Hwy 234 by any peat company- until the Province of Manitoba and/or the peat companies undertake the complete reengineering and rebuild of Hwy 234. Hwy 234 must be rebuilt just for current circumstances, where the Province of Manitoba should never have permitted the extent of the existing peat operations - and where it was clearly known that the road was never engineered for such extreme commercial use.

As referenced, the residents, seasonal residents and fishers have contributed greatly to the



economy of the Interlake and the Province of Manitoba, by much more than \$100 million of initial investment by very conservative estimate, and likely hundreds of thousands if not millions more every year. We deserve consideration for our contributions, as we are very significant stakeholders, with long term permanent contributions that are far greater than the peat companies that are opportunistically exploiting resources with egregious consequences to all other Hwy 234 stakeholders.

We would be pleased to speak directly with you about any of the information presented in our letter in support of our opposition and protest against any further peat permits.

Very Truly Yours,

A black rectangular redaction box covering the signature area.

From: [REDACTED]  
Sent: Monday, November 18, 2024 10:52 PM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Cc: [REDACTED] Johnson, Derek (PC Caucus) <derek.johnson@leg.gov.mb.ca>  
Subject: Comments on Public Registry Posting 6236.00-Sugar Creek Bog Peat Harvesting

Dear Mr. Wood,

Please find enclosed comments regarding the Sugar Creek Bog Peat Harvesting project proposed by Sun Gro Horticulture Canada Ltd. I will send additional photographs of peat build up in and around Little Bullhead Bay by separate email.

Yours truly,

[REDACTED]

November 18, 2024

Bryce Wood  
Environmental Approvals Branch  
Manitoba Environment and Climate Change Box 35,  
14 Fultz Boulevard  
Winnipeg MB R3Y 0L6

Via email: [Bryce.Wood@gov.mb.ca](mailto:Bryce.Wood@gov.mb.ca) Dear Mr.

Wood:

**Re: Sugar Creek Bog Peat Harvesting, Sun Gro Horticulture Canada Ltd (Public Registry 6236.00)**

Please accept these comments regarding Public Registry posting 6236.00 - Sun Gro Horticulture Canada Ltd's proposal to operate a peat mining operation in the Sugar Creek Bog. We wish to oppose this proposed operation in the strongest possible terms due to the significant risks posed with respect to: (1) water quality in Lake Winnipeg, (2) destruction of wildlife habitat, (3) greenhouse gas emissions, (4) impacts to the local ecosystem and shoreline, and (5) adverse impacts to highway 234 and other public safety concerns. The cumulative impacts of existing peat mining operations in this area are already well over what could be considered sustainable or environmentally acceptable. Adding yet another development to this region would cause catastrophic impacts to the local environment and nearby communities, and would put further pressure on Lake Winnipeg as well as wild animals, including moose, who are already facing many threats to their survival.

We have reviewed the more detailed comments submitted by cottage owners at Little Deer and Mill

Creek Beaches Cottage Subdivisions, and fully support those comments. At a fundamental level, the information contained in the Public Registry posting is insufficient for any member of the public to objectively assess the risks posed by this project given that the only report available was paid for by the proponent Sun Gro and drafted by KGS Group for the express purpose of enabling Sun Gro “to obtain the required Environment Act Licence for peat harvesting at the Sugar Creek sub areas B, C, D and E.” That is, the purpose of the Report is not to objectively weigh the risks of the project and inform the public about its impacts, but rather to ensure the proponent gets the approvals that it needs to proceed.

It should come as no surprise that a company hired by Sun Gro to ensure Sun Gro obtains these approvals would conclude that the project “will not likely result in significant adverse environmental effects”. Unfortunately, this conclusion is not plausible in light of the existing science regarding environmental risks posed by peat mining activities, particularly in close proximity to Lake Winnipeg. Nor is it plausible in light of experience in this region with existing peat mining operations and the significant cumulative effects these operations are already having on the environment and local residents.

### **Need for a public hearing**

For the reasons stated below, we oppose this proposed peat mining development. In the event that you consider allowing it to proceed despite opposition from First Nations, impacts to the local environment and Lake Winnipeg, associated greenhouse gas emissions, and impacts to highway 234, we request that at the very least you refer the proposal to the Clean Environment Commission for a public hearing pursuant to section 11(10) of the *Environment Act*, which states as follows:

11(10) Notwithstanding subsection (9), where the director receives objections and reasons for the objections with respect to a proposed development, the director may, within such time as set out in the regulations recommend that the minister cause the commission to hold a public hearing; but where the director decides not to recommend a public hearing be held, the director shall provide written reasons to the objector, and advise the objector that the decision can be appealed to the minister.

As noted above, the KGS Group Report prepared for the proponent Sun Gro is not sufficient to ensure Manitobans can determine the likely impacts of this project and to weigh those impacts against its benefits. The Report is not an objective, science-based assessment of likely environmental impacts and impacted residents have had no opportunity to test and question the claims contained therein.

Peat mining is a hugely controversial activity in the province, including in this area in particular. Given the stakes for Lake Winnipeg, wild animals, and Manitoba’s contributions to global climate change, at the very least we and other impacted individuals, communities, and First Nations deserve the opportunity to test the arguments advanced by Sun Gro in support of this proposal and seek the opinions of objective experts to ensure any decision reached reflects a clear and unbiased understanding of the environmental risks associated with the project, as well as the precautionary principle of international and domestic environmental law.

### **Impacts of existing operations**

Peat mining has already caused extensive damage to highway 234, and released peat and other sediment into Lake Winnipeg and the air in and around the Sugar Creek Bog. Our extended family has had a cottage at Leaside Beach on Little Bullhead Bay (Lot #2) [REDACTED] and we have regularly spent time in the area since then. We purchased our own cottage at Leaside Beach [REDACTED] Since the existing peat mining operations began clearcutting and harvesting

operations, we and our neighbours have observed three main impacts. First, the water in and around Little Bullhead Bay and its tributaries are increasingly saturated with peat. There is often a wall of peat along the water that is so wide and high as to prevent any recreational access to the Lake at all. There are two main creeks that enter the Bay from the west and we have observed that they are overloaded with peat at times as well. There has been significant discussion amongst cottagers at Leaside about what to do when we observe these high concentrations of peat, given the general lack of information about how to report these problems to environmental enforcement officers. We have tried to report these concerns to the general environmental compliance email address for the Interlake (and have been advised that others on the Bay have similarly attempted to do so) and have received no response. As a result, the vast majority of significant peat build up incidents go unreported.

Similarly, we are increasingly observing a layer of peat distributed on vehicles, decks, and other outdoor surfaces, suggesting that there is a significant amount of peat being released to air from the nearby operations.

Second, we have observed a noticeable change and decrease in wild animal populations present in the area. While we appreciate that these observations are anecdotal, it appears that there are fewer large mammals (including moose), small mammals (including northern flying squirrels and chipmunks), frogs, and snakes than there were prior to these operations. At a minimum, a comprehensive study of local wildlife populations and the impacts of existing peat mining operations on these populations should be conducted before further peat mining operations are approved in this area.

Third, highway 234 is now extremely dangerous and often impassable without a large truck or similar vehicle (which we do not have). This is not only an inconvenience but also a safety hazard. There have been numerous accidents that we are aware of, and given the lack of cell phone coverage on the road the risks are particularly high. Our vehicles and those of visitors to our cottage are frequently damaged from the increasingly significant bumps in the road. While cottager traffic on highway 234 is higher than it was twenty years ago, we would note that in the past the ferry to Bloodvein was still operational so there is likely a similar level of recreational vehicle traffic on the road now as there was in decades previous, yet before the peat mining operations commenced the highway was nonetheless in generally good condition. It would appear that the significant number of peat mining trucks on the road are the cause of the road's worsening condition. This is a significant inconvenience and expense to us, but more importantly it impacts year-long residents of Pine Dock, Matheson Island, and other communities and represents a safety hazard.

### **Destruction of wildlife habitat**

The KGS Report concedes that clearcutting the Sugar Creek site will result in loss and disturbance of



mammal habitat. However, the Report on the whole appears to downplay the importance of the Sugar Creek Bog as habitat essential to the survival of many birds, reptiles, insects, plant species, and small mammals.

The proposed mining site is located within Moose Creek Provincial Forest as well as the Moose Creek Wildlife Management Area (WMA). Bogs such as Sugar Creek are known to provide habitat to species such as muskrat, beaver, moose, deer, and small rodents. Though peatland habitat is used by moose and moose populations are rapidly declining across the province due to a range of causes, the KGS Group's Report focuses on a lack of studies proving that peat harvesting itself causes a decline in moose populations. This conclusion ignores the cumulative risks facing moose populations in Manitoba, and the reality that peat harvesting is far from the only threat that they face. Destroying moose habitat will undoubtedly exacerbate the perilous situation faced by moose in this region.

The KGS Group's conclusion is also at odds with the precautionary principle of environmental law, which is clear that a lack of scientific certainty regarding the harm caused by destroying bog habitat on which moose and other animal populations depend should not be used to delay action to protect these animals. To conclude that the project will not cause adverse environmental impacts because the company did not happen to observe rare or at risk wildlife species during the baseline investigation does not accord with the precautionary principle and is inadequate to accurately assess the likely ecosystem impacts of the proposed project.

The KGS Group's Report indicates that eight mammal species were documented within the Sugar Creek sub-areas, including beaver, black bear, bobcat, muskrat, gray wolf, moose, red squirrel and white-tailed deer. We have also observed lynx and many other mammal species in this area. Peat mining activities in the area surrounding the Sugar Creek Bog have already destroyed significant swaths of habitat for moose and other animals and the impacts of the destruction of the Sugar Creek Bog must be assessed in light of this cumulative habitat destruction.

The KGS Group's Report notes that no rare amphibian or reptile species have been documented at or within 3 km of the project site. However, we would note that we have observed red-sided garter snakes in this area, as well as northern leopard frogs and western painted turtles. Amphibians tend to be most visible in the region during the summer months, though it appears the KGS data was based only on site visits during four dates in April and May. Again, this is entirely insufficient to justify a finding that the proposed mining operation will not adversely impact amphibians and reptiles.

### **Risks to Lake Winnipeg**

The proposed mining site is currently a forested wetland covered predominantly with black spruce. Wetlands such as this play a vital function as wildlife habitat, as well as in improving water quality in lakes and rivers. This includes reducing blue-green algae blooms which are of increasing concern in Lake Winnipeg. Mining of the Sugar Creek Bog will remove the Bog's filtering capacity while increasing sediment run-off from the area.

The KGS Group Report notes that following the removal of surface vegetation, exposed peat particles can be transported into the drainage system, thus increasing suspended particles and other chemical parameters (primarily pH) in surface water. Certainly this has been the experience for residents at Leaside Beach on Little Bullhead Bay following peat mining operations nearby and we understand that those near other peat mining operations in the region have observed similar impacts. Photos of peat buildup on our Bay are enclosed with these comments by way of example. This is an increasingly frequent occurrence that is damaging creeks on the bay and significantly impeding the use and enjoyment of the Lake for all residents. Approving yet another peat mining operation in this area would add to this already unacceptable burden and should not be allowed.

### **Greenhouse gas emissions**

According to the IUCN, peatlands are a type of wetland which are critical for both preventing and mitigating the effects of climate change, as well as preserving biodiversity, minimizing flood risk, and ensuring safe drinking water.<sup>1</sup> They are the largest natural terrestrial carbon store, storing more carbon than all other vegetation types in the world combined. They store twice as much carbon as all forests in the world.<sup>2</sup> Draining and mining peatlands causes the release of significant amounts of carbon dioxide and other greenhouse gasses, turning carbon sinks into carbon emission sources. For these reasons, the IUCN has called upon countries to commit to peatland conservation.

In 2021, national carbon emissions from peat production in Canada were estimated to be 2.1 million tonnes - roughly the equivalent of consuming nearly five million barrels of oil.

Extracting peat from the Sugar Creek Bog will result in the emission of significant amounts of carbon. Even if at some point in the distant future the Sugar Creek Bog ecosystem - which formed over the course of thousands of years - can be restored, it will be too late to mitigate the project's contribution to global climate change.

### **Safety concerns**

Existing peat mining traffic on highway 234 is not only inconvenient and disruptive, but also poses a serious public safety risk. We are aware of cottagers who have had accidents on the road due to its increasingly poor state and are concerned that road users may ultimately become

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<sup>1</sup> See, e.g. <https://iucn.org/resources/issues-brief/peatlands-and-climate-change>

<sup>2</sup> <https://www.unep.org/news-and-stories/story/peatlands-store-twice-much-carbon-all-worlds-forests>

injured or even die because of the road's deteriorating quality and due to the near-constant presence of large trucks associated with nearby peat mining operations. Many of these trucks are driven excessively fast down the road and drivers often fail to make adequate room for other passing vehicles on the road, leaving families traveling in cars and smaller vehicles at risk.

The KGS Group report acknowledges that the project will cause an increase in road traffic and it is our view that the project should be firmly rejected on that basis alone - highway 234 simply cannot handle more truck traffic. With respect, the Report significantly downplays the impact of this traffic (which would include an additional 125 trucks per week as well as additional employee personal vehicle traffic)

and does not acknowledge or assess at all the already dismal state of the road due to peat mining operations. Paving the road would be extremely expensive and should not fall to the public purse, given that the poor state of the road is primarily due to the operations of large, private peat mining companies (Sun Gro Horticulture's annual revenue is approximately \$376M) that rely on highway 234 for their operations.

The fire at Beaver Creek has been noted in other comments. We would note as well that a fire was observed this summer at the peat mining site near Leaside Beach. Thankfully, it was reported quickly and no damage to homes or cottages was caused but there has been no communication with residents about that fire, what caused it, and what measures (if any) are being taken to ensure no fires occur at the site in the future.

### **Conclusion**

The environmental risks posed by this project are significant and simply cannot be justified. We ask that you deny the requested approvals and that the province introduce a moratorium on new peat mining licences near Lake Winnipeg. At the very least, we ask that a public hearing be held to enable public participation in this decision-making process and to facilitate a thorough and objective review of the risks posed by this proposed peat mining project.

Yours truly,

[Redacted signature block]

CC: MLA Amanda Lathlin MLA  
Derek Johnson

















From: [REDACTED]  
Sent: Monday, November 18, 2024 6:50 PM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Cc: [REDACTED]

**Subject: Sugar Creek Bog Peat Harvesting Proposal File 6236.00**

Dear Bryce,

Sending today, on the November 18th, 2024 deadline for your reference to the above proposal which we both protest and oppose for Sun Gro Horticulture Canada to construct and operate a Peat Moss Harvesting Development at Sugar Creek Bog.

We, [REDACTED] and myself [REDACTED] have owned our lakefront beachfront property on Leaside Beach Road, [REDACTED]

Moving forward to today's issues, the road, hwy 234, has become extremely dangerous in it's almost undriveable condition, without fear of an accident since owning our property. The carelessness and recklessness of the many semi truck drivers that go to and from the Peat Moss plant sites is without a doubt hazardous to anyone driving on Hwy 234. Most follow no legalities/driver rules or etiquette on that road when it comes to approaching other vehicles, of persons that travel the road seasonally or year round. Personally I'm afraid to drive on this road.

One excavation Sun Gro site entrance is literally parallel to our cottage access road and the noise begins early morning until late evening. No more sounds of birds and nature just the noise of semi trucks coming and going and heavy equipment sounds all day long.

Our beachfront is no longer the "Grand Beach" quality to give you a comparison, like it was when we first purchased it. I invite you to come swim in our corner. In front of our [REDACTED] But first you'll have to walk through the sludge and toxins of the peat. It's completely taken over our beautiful beach. No longer a valuable selling feature for when the time comes. Definitely decreasing property values and our physical health. Breathing in that peat is definitely a toxic health hazard.

Also, this summer on August 4th, 2024 myself, our company and fellow cabin owners from Lot # 3 had a scare with lots of black smoke billowing upward behind all the cabins whereby I contacted conservation which I had to call back for answers which never came. They told me a helicopter was sent up. None of us heard or saw a helicopter. It appeared to be coming from the west portion of Little Bullhead Peat Moss excavation plant that is situated directly behind the cabins. Keeping in mind one road access- hwy 234 in and out, north and south. Someone should have taken it seriously as we did, awaiting a call at our cabin that never came.



We also endure peat moss inside the cabin and on the outside of our cabin depending on the wind directions of any given day. It covers the windows comes inside as we love to have the windows open, it covers the siding and the decks. So naturally we're all breathing it in.

Completely unacceptable, all over the above.

Please see my attached photographs from this season, year 2024. I will attempt to send a short video to you separately if size limitations allow.

I and we all, speaking for myself and all the Leaside Beach property owners await and deserve a viable and agreeable appropriate response and solution to these above issues.

The Province of Manitoba Environmental Approvals Branch needs to step in and step up for all of the property owners affected, off hwy 234, south of Sun Gro Peat Moss plant.

I can be reached at this email or on my cell at [REDACTED]

Thank you kindly,

[REDACTED]















From: [REDACTED]  
Sent: Monday, November 18, 2024 3:37 PM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Subject: Response to Sun Gro EAP 6236.00 from Little Deer & Mill Creek Beaches

Dear Bryce,

I am submitting a response to Sun Gro's Sugar Creek EAP 6236.00 on behalf of cottagers at Little Deer and Mill Creek Beaches cottage subdivisions (pdf, attached).

Please acknowledge the receipt of our submission.

As mentioned in the response, we are requesting a public hearing by the Clean Environment Commission.

Sincerely,

[REDACTED]

**Response to Environment Act Proposal 6236.00  
Sun Gro Horticulture, Inc.  
Sugar Creek Bog Peat Harvesting**

**from Cottage Owners  
at Little Deer and Mill Creek Beaches Cottage Subdivisions**

**November 18<sup>th</sup>, 2024**

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## 2 Overview

Peat mining on the Washow Bay Peninsula occurs on the shores of Lake Winnipeg in close proximity to a number of cottage areas and communities. As peat mining has expanded over the past 15 years, a number of negative externalities have developed which compromise the natural value, recreational opportunities, and infrastructure in the area. Sun Gro Horticulture, Inc. has been operating on the Washow Bay Peninsula since 2015. In the present Environment Act Proposal (EAP) for Sugar Creek [1], Sun Gro proposes to increase its footprint in the area which will result in further environmental damage.

Peat mines should limit their impact to removing peat. If and when their EAPs are approved, they should not have destructive effects outside the leased area. The mitigation plans and licence conditions are intended to prevent this, but they do not.

There is cumulative damage from all the peat mines in our area. Peat is washing up on the shores of Beaver Creek Provincial Park and several cottage areas nearby. The only road serving our area, Provincial Road 234, was nearly impassable this summer due to the damage caused by heavy transport trucks delivering peat. In 2020, a fire started at Sun Gro's Ramsay Point site, which destroyed six cottages in Beaver Creek Provincial Park.

Cottagers understand the value of economic development in the area, but the Environmental Approvals Branch (EAB) must stop approving new peat mine EAPs until they have acknowledged and remedied the damage that has already been caused by peat mining on the Washow Bay Peninsula. This includes setting licence conditions to prevent destructive externalities which are borne by the rest of society, securing commitments from relevant government departments to maintain the area's infrastructure, and remediating the existing damage.

Cottagers on the Washow Bay Peninsula have been expressing opposition to the expansion of peat mining in our area since 2011, as more and more peat mines have been established and the environmental toll increases. The EAB has neither acknowledged nor addressed our concerns during this time. There is no mechanism in the Environmental Assessment and Licencing (EAL) process to address the cumulative damage caused by all the peat mines operating in our area.

A public hearing must be held by the Clean Environment Commission, through which our concerns will be acknowledged and addressed in our presence.

Peat mining is harming the Washow Bay Peninsula and Lake Winnipeg. It harms permanent residents, cottagers, and recreational users. Manitobans are justifiably concerned about the destruction of Lake Winnipeg's wetlands and the damage done to the area. A petition to halt the expansion of peat mining on the Washow Bay Peninsula has gathered over 800 signatures [2]. Sun Gro's Sugar Creek proposal was the subject of a recent news article describing cottagers' frustration with local peat mines and the Manitoba government's apparent unwillingness to address the damage peat mining causes to the local environment [3].



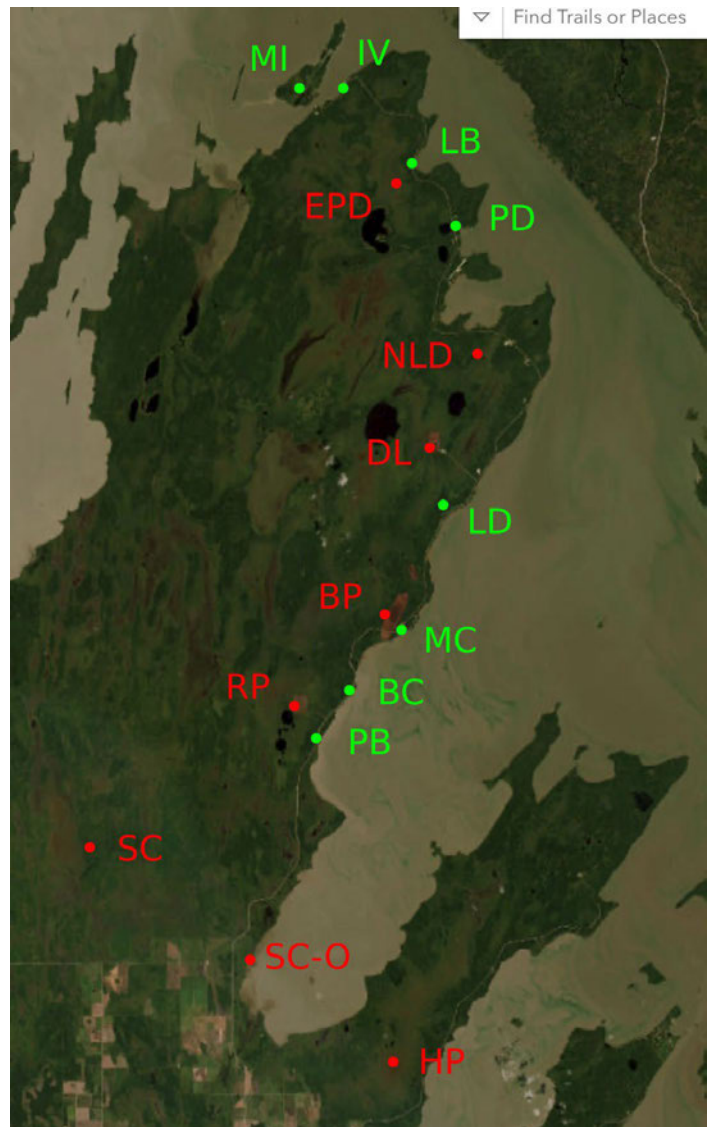
### 3 Cumulative Effects of Peat Mining on the Washow Bay Peninsula

The Manitoba government has established a number of cottage areas along the west shore of Lake Winnipeg on the Washow Bay Peninsula including Islandview, Leaside Beach, Little Deer, Mill Creek Beaches, and Pebblestone Beach (Figure 1). These recreational areas, as well as the communities of Matheson Island and Pine Dock and nearby Beaver Creek Provincial Park, are located along Provincial Road 234, which follows the eastern shoreline of the peninsula.

Starting in 2011, there has been a dramatic increase in peat mining on the Washow Bay Peninsula. Every community and cottage area is now in close proximity to a peat mine (Figure 1). Sun Gro Horticulture [4], Sunterra Horticulture [5], and Berger Peat Moss [6] all have active operations in the area. Sun Gro's Sugar Creek EAP [1] proposes to extend the swath of active mines southward toward Hecla-Grindstone Provincial Park.

All these peat mines in a delicate wetland environment, in such close proximity to recreational and residential areas, are causing problems. In addition to destruction of Lake Winnipeg's wetlands and animal habitat, P. R. 234 has been poorly maintained and cannot withstand the heavy trucks transporting peat. Peat is accumulating on Lake Winnipeg's shoreline and in cottagers' lots. A fire at Sun Gro's Ramsay Point Site destroyed six cottages in Beaver Creek Provincial Park.

EAPs for these projects have been approved without regard for the cumulative effects they are having on peat pollution of Lake Winnipeg, safety of the surrounding communities, and the poor condition of P. R.



**Figure 1.** Cottage areas, communities, and peat mines on the Washow Bay Peninsula. Communities and cottage areas (green, top to bottom): Matheson Island, Islandview, Leaside Beach, Pine Dock, Little Deer, Mill Creek, Beaver Creek Provincial Park, and Pebblestone Beach. Peat mines (red, top to bottom): Sunterra's East Pine Dock and North Little Deer Lake mines, Berger's Deer Lake and Beaver Point mines, and Sun Gro's Ramsay Point mine. Sun Gro's proposed Sugar Creek site (SC) and its drainage outlet (SC-O) and Hay Point site (HP), the proposal for which was not approved, are also shown in red.

234. In addition to the mines in operation today, there are even more leases held by these and other peat mine companies (Figure 2). If these leases are developed, the extent of the damage will worsen unless the cumulative effects of peat mining are taken into consideration when evaluating new EAPs. The Technical Advisory Committee (TAC) for Sun Gro's Ramsay Point EAP raised the issue of cumulative effects:

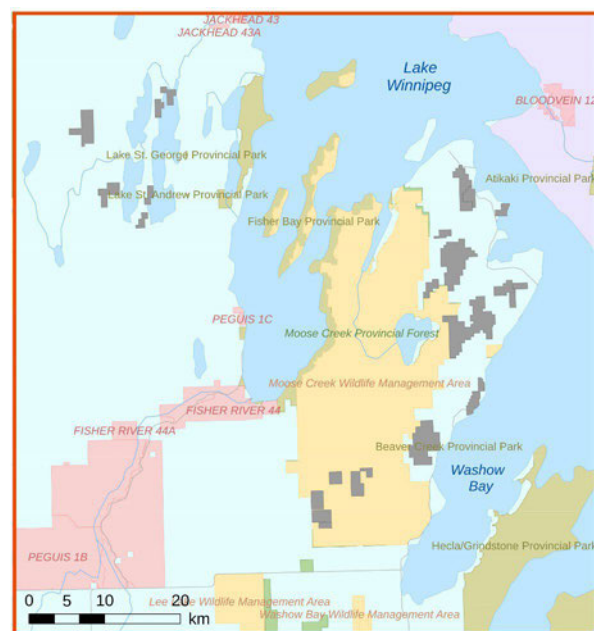
As identified in 6.2.1 although the proponent indicates that the total and potential peat development as proposed is far below the actual areas of bog habitat within the study area the report does not indicate that most if not all the large bogs on Washow-Fisher Peninsula are all held under current valid quarry leases. Based on this if the remaining bogs are commercially developed the cumulative effects on the overall areas of bog habitat will be significant. - Manitoba Conservation Sustainable Resources and Policy Management Branch and Land Programs Branch [8]

The EAPs for Berger [9], Sunterra [10], and Sun Gro's Ramsay Point site [11] all reported in-house cumulative effects assessments which found no major effects and proposed no additional mitigation measures. These results are incompatible with the observations of residents, cottagers, and recreational users of the Washow Bay area. The EAL process must include an independent assessment of the cumulative local effects of the proposed project in combination with all other activities in the area.

### Recommendations

The Director of Environmental Approvals should immediately review the licence conditions of Sun Gro's, Sunterra's, and Berger's licences to operate in the Washow Bay area. New licence conditions and mitigation plans should be developed to prevent further damage to the area.

An independent, on-site evaluation of the cumulative local effects of all the peat mines on the Washow Bay Peninsula is needed. Effects of peat mining on the environment, infrastructure, pollution, and safety must be determined. This assessment must be used in current and future EAP decisions regarding approvals of peat mines in our area.



### Manitoba's Peat Harvest Licences



**Manitoba**  
Sustainable Development

Forestry and Peatlands Branch  
Date Produced: October 6, 2017  
Projection: UTM NAD83 - Zone 1

**Figure 2.** Peat leases (shaded in grey) on the Washow Bay Peninsula, adapted from [7].

## 4 Damage to Provincial Road 234

Provincial Road 234, the only road serving the Washow Bay Peninsula, was built through wet, boggy terrain with no expectation that it would receive heavy truck traffic. Because of its poor foundation, constant grading is required from the moment it thaws in the spring until it freezes again each winter. In wet weather, it becomes a single muddy track (Figure 3) and overflowing ditches cause washouts. In dry weather, dust limits visibility (Figure 4) and loose gravel presents a safety hazard. Dust control application is of limited utility, since grading is needed after every significant rainfall (i. e., every few days during the summer). It is on this unsafe road that a



**Figure 3.** Provincial Road 234 reduced to a single track with foot-deep ruts, July 3 2024 [12].

parade of transport trucks are hauling peat, causing further damage and presenting safety hazards to other traffic. On July 25th this year, the Winnipeg Free Press published an article, "Fed up with Herky-Jerky Ride - Interlake Drivers Lobby for New Highway," describing the dismal state of this road [14].

P. R. 234 has deteriorated steadily in parallel with the expansion of peat mining in the Washow Bay area over the past 15 years. Truck traffic has increased from 20 truck trips per day in 2011 [10] to 134 truck trips per day in 2024 [15], during which time there has been no change in overall traffic [16]. Since ruts over a foot deep can only be caused by heavy vehicles with high clearance, the damage can be confidently attributed to transport trucks. Although grading costs have dramatically increased with increasing peat truck traffic [17], P. R. 234 remains in poor condition. The foundation of the road needs to be rebuilt.



**Figure 4.** Oncoming trucks reduce visibility on P. R. 234 to zero during dry weather, 2019 [13].

The Sugar Creek mine, if approved, will contribute 50 additional trips per day in its peak production years [15]. In addition to putting additional pressure on P. R. 234, this traffic will also use P. R. 325 [1], another gravel highway which was not constructed with heavy traffic in mind. If there is no plan to maintain P. R. 325, it will suffer the same fate as P. R. 234.

As peat mining has expanded, Manitoba Transport and Infrastructure (MTI) has neglected the maintenance of P. R. 234. Application of low-quality, muddy gravel has resulted in deep ruts and a slippery surface during wet weather. Constant grading with insufficient gravel application has resulted in exposed, torn geo-cloth foundation material. The annual budget for summer maintenance of P. R. 234 is approximately \$700K, most of which is spent on grading and gravel application [17]. There has been no increase in funding over the years to address the increased load of heavy trucks [17]. Recently, MTI committed \$2.25M for repairs during 2025-2026 [18]. Obviously, a much greater investment than this will be needed to make noticeable improvements to the entire 92-km length of P. R. 234.

Cottagers communicated with MTI this summer, resulting in application of larger-than-usual amounts of gravel this year. This made the highway passable for the rest of the season, but it is only a temporary solution; that gravel will have disappeared into the ground by next year. The foundation of P. R. 234 needs to be improved if it is going to sustain this level of heavy traffic. To date, we have received no information about future repairs. A petition, "Immediately rebuild Manitoba Provincial Highway 234 to ensure that the highway is safe," was started on Change.org this summer, which now has over 1000 signatures [19]. A paper petition to repair P. R. 234 will be presented to the Manitoba Legislature on behalf of cottagers by Derek Johnson, MLA for Interlake-Gimli.

MTI has an important role to play in the EAP process, which is to establish conditions for these proposals such that P. R. 234 is safe to use. In its response to Sun Gro's Sugar Creek EAP, MTI must provide a costed plan for the repair and maintenance of P. R. 234 and 325, such that they can withstand the volume of heavy trucks serving all the peat mines in the area.

The EAB, in turn, must ensure that MTI fulfills its obligations to Manitobans. It must not ignore the advice of the Technical Advisory Committee, who raised the concern that truck traffic will impact users of Beaver Creek Provincial Park in the TAC report for Sun Gro's Ramsay Point mine:

It is proposed that traffic flow into the development will be low initially but will increase to 196 haul trucks at peak production. Proposed seasonal operation of the peat mine (April through October) coincides with peak park usage times. Increased large truck traffic going into and out of the proposed peat mine so close to the park entrance has the potential to greatly impact park users. PR 234 is also a gravel road and even with the proposed mitigation measures for dust control there is the potential for increased amounts of dust in the air to impact visitor experiences. - Parks and Natural Areas Branch [8]

Despite this warning by the committee chosen to evaluate the EAP, no action to protect local users was taken. MTI and the EAB are failing to support the cottage areas and communities along P. R. 234,



as well as Beaver Creek Provincial Park. We need this road to be in better condition. It's the only road serving the area, and is therefore a vital link in an emergency.

*Recommendations*

MTI must commit to maintaining P. R. 234 and P. R. 325 in a state fit for ordinary passenger vehicle traffic. Residents and cottage owners need a safe, well-maintained road. In its response to Sun Gro's Sugar Creek EAP, MTI should advise the EAB what repairs and maintenance are needed, and what it will cost, to maintain PR 234 given the cumulative amount of heavy truck traffic from all the peat mines on the Washow Bay Peninsula.

The EAB must take these costs into consideration while evaluating the EAP. The EAB must ensure that the projects they approve do not destroy public infrastructure. If the costs outweigh the benefits, the EAP should not be approved.

## 5 Peat Accumulation on the Lake Winnipeg Shoreline

Peat has been accumulating on the beaches of cottage areas on the Washow Bay Peninsula (Figure 5). Pebblestone Beach, Beaver Creek Provincial Park, Mill Creek Beaches, and Leaside Beach, all of which are close to peat mines and their drainage outlets (Figure 1), have experienced peat buildup on their beaches in the past few years, as peat mines have expanded their operations. Peat dust is also accumulating on cottage properties at Mill Creek. This pollution compromises the quality of recreational opportunities for cottagers and provincial park guests.

Peat was collected from the shoreline at Pebblestone Beach and presented at the Stakeholder Engagement meeting held for Sun Gro's Sugar Creek EAP at Pine Dock on April 15th, 2024. Sun Gro employees acknowledged that it was peat. It is likely that the origin of the peat at Pebblestone Beach is the Sun Gro's nearby Ramsay Point mine, which discharges its drainage water into Beaver Creek and an unnamed drain, both of which open into Lake Winnipeg near Pebblestone Beach (Figure 6).



**Figure 5.** Peat accumulation on the shore of Lake Winnipeg at Pebblestone Beach, 2023 [20].

Cottagers at Mill Creek Beaches have experienced peat accumulation in their cottage lots. Since Sunterra's Beaver Point operation is immediately adjacent to Mill Creek, it is the most likely source of this presumably airborne peat. It is also possible that some of the peat deposition into Lake Winnipeg may be airborne.

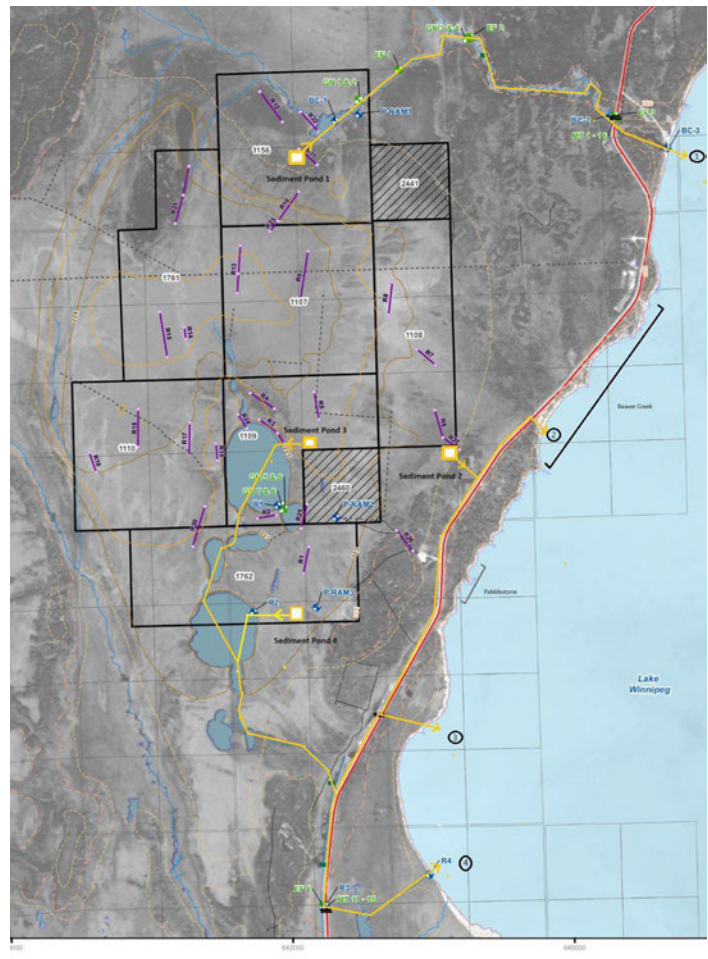
Peat mines drain the peat bogs prior to harvesting. Ditches are cut into the bog and connected to drainage outlets which empty into Lake Winnipeg. Drainage outlets from peat mines are permitted to contain 25 mg/L Total Suspended Solids (TSS) over baseline measurements [1, 9-11], most of which is presumably peat.

While most of the solids are released during the initial drainage of the bog, significant solids are also released during periodical deepening of the drainage ditches to allow continued harvesting.

Considering only peat released during these two phases of harvesting, the amount of peat permitted to be released into Lake Winnipeg from the peat mines in the Washow Bay area was calculated using data provided in Sun Gro's Sugar Creek EAP [15].

In 2024, Sun Gro's Ramsay Point mine was permitted, by the licence conditions set by the EAB, to release approximately 13 tons of peat into Lake Winnipeg. Total permitted peat release into the lake in 2024 by all peat mines operating in the Washow Bay area is 24 tons. It is no surprise, therefore, that peat is accumulating on nearby shorelines.

If Sun Gro's Sugar Creek mine is approved with the same licence conditions, it will be permitted to release as much as 15 additional tons of peat yearly into Lake Winnipeg while it simultaneously prepares new fields and deepens the drainage of existing fields. This peat will likely wash up on the shores near the proposed drainage outlet at Sugar Creek [1], adjacent to Hecla-Grindstone Provincial Park (Figure 1). In fact, the Sugar Creek outlet is in close proximity to Sun Gro's proposed Hay Point mine site [21], which was not approved in 2013 due to the risks of environmental damage to Hecla-Grindstone Provincial Park.



**Figure 6.** Four drainage pathways (shown in yellow) from Sun Gro's Ramsay Point site. Adapted from [11], Figure 8.

Destruction of fragile wetlands and deposition of peat into Lake Winnipeg are the direct result of the peat mining industry. It is proof that Sun Gro, as well as the other peat mine companies in the area, are not adequately controlling their impact on the environment, and that further regulatory measures are required. It is unacceptable for the EAB to allow such large amounts of peat to be dumped into Lake Winnipeg.

### *Recommendations*

Immediately stop approving new peat mines until the problems with the existing mines are resolved.

Immediately initiate a review of the licence conditions of existing peat mines. Create and enforce mitigation and licence conditions which prevent future peat accumulation, whether water-borne or airborne. Apply these conditions to existing and new peat mines.

Remove the peat from Lake Winnipeg's shorelines and from cottagers' properties.

Provide the public with the water sampling reports from the peat mines operating on the Washow Bay Peninsula. With actual TSS measurements, more accurate modeling of peat deposition could be done than is possible using projections based on projected harvest activity, which would help in setting an appropriate TSS limit.



## 6 Fire and Safety

On June 1, 2020, a fire destroyed six cottages in Beaver Creek Provincial Park [22]. It started at Sun Gro's Ramsay Point site, where a tractor set fire to a pile of harvested peat. Inadequate communications equipment delayed the reporting of the fire, allowing it to get out of control. For two days, the cottage areas and communities north of the fire were trapped behind an RCMP roadblock without hydro or phone service.

There had been two safety inspections at the Ramsay Point site before the fire, the last one in 2018 [23]. Neither of the inspection reports mentioned communications equipment or fire safety. The licence conditions for Ramsay point do not mention communications equipment or fire safety [4].

There has been one safety inspection since the fire, in 2021 [23], the report of which did not mention communications equipment or improvements to equipment to minimize fire risk. Immediately following the fire, Sun Gro prepared a new Emergency Response Plan [24]. No changes to communication equipment were mentioned. No changes to equipment or procedures to minimize fire risk were mentioned. It is clear that the plan was written without the knowledge that there is neither cell phone service nor 911 service in the area.

Draining wetlands to harvest peat dries out the area, increasing the risk of wildfire. Peat extraction processes expose dry, flammable soil that can easily lead to wildfires or dust clouds during strong winds. If approved, Sun Gro's Sugar Creek project will expand the drained, dry area southward toward Hecla-Grindstone Provincial Park, as well as farms and residences along P. R. 325.

What needs to be done differently to prevent another fire?

### *Recommendations*

Place safety reports, emergency response plans, and all other required reports on the EAL public registry, as Sun Gro agreed to do in its Ramsay Point EAP [11].

Immediately review Sun Gro's operating procedures at Ramsay Point. Add new mitigation and licence conditions as necessary to reduce the probability of another fire.

## 7 Information and Compliance

The public is at a systematic disadvantage in the EAP process. Our main sources of information are the peat mine companies and the EAB, neither of which reliably provides meaningful information in a timely manner.

The EAB is well aware of the existence of cottage areas on the Washow Bay Peninsula which are administered by Municipal and Northern Relations (MNR), if only through their opposition to earlier peat mine EAPs. However, MNR-administered cottage areas have never been included in stakeholder engagement sessions, nor are they mentioned as stakeholders in EAPs. The newest cottage areas on the Washow Bay Peninsula were established in 2005, which is ample time for them to be recognized. Although these cottage areas are in close proximity to the peat mines, they must learn of plans for new peat mining projects second-hand, and contact the EAB on their own initiative to be included in stakeholder engagement meetings to learn more about these projects. The EAB should ensure that all stakeholders are offered the same opportunities to participate in the EAL process.

As the municipal authority for the cottage areas it administers, MNR has a duty to advocate for them, especially when they have been asked repeatedly to do so. MNR should ensure that cottage areas are listed as stakeholders in the peat mining EAPs and ensure they have the information they need to develop an informed opinion on the impacts of peat mining in the area. MNR should ensure that, when they submit our opinions to EAPs, they are taken seriously.

It is unnecessarily difficult and time-consuming for the public to obtain reliable information on the EAP process and the activities of peat mines. Files are missing from Environment and Climate Change's public registry:

The entry for Berger's Deer Lake Bog project lists only three files, all related to a recent alteration request [25]. The EAP, TAC comments, information requests and their corresponding responses, and earlier versions of the licence are all missing.

The entry for Sun Gro's Ramsay Point Bog project lists only four files; the summary document and the three versions of the licence [26]. The EAP, TAC comments, public comments, information requests and their corresponding responses are all missing.

How can the public learn about these projects if the public registry is poorly maintained?

Given the peat accumulation on Lake Winnipeg's shoreline near the peat mines' drainage outlets (Section 4) and the fire at Sun Gro's Ramsay Point site (Section 5), there are legitimate concerns regarding Sun Gro's adherence to the conditions of their existing licence. However, their water testing reports, safety inspection reports, and their emergency response plan are accessible only through FIPPA, which embeds a 45-day delay into each request. The public can't access this information in time to prepare a well-researched response within the 30-day consultation period. This is not the intended use of FIPPA. Information intended for public benefit should be readily available.

The public does not have access to reliable information about the water testing being done by Sun Gro at their Ramsay Point site. While their licence lists three sites for water sampling [3], attendees of the stakeholder engagement meeting (April 15th, 2024, Pine Dock) that testing is only being done at two sites [27]. There are at least four drainage outlets from the Ramsay point site (Figure 6). Without access to the water testing reports, it is unknown which outlets are being monitored and whether they are exceeding the EAB's accepted limits for pollutants.

Sun Gro has not fulfilled its reporting requirements as outlined in their Ramsay Point EAP:

Reporting requirements for the proposed peat mine development will be placed in the public registry for the project and an annual summary of the detailed reports filed immediately following incidents that require implementation of the emergency response plan.

Reporting requirements for the proposed development will also likely include an annual compliance surface water quality report, summary of annual generation of peat and a detailed report following incidents that require implementation of the emergency response plan. Sun Gro will be responsible for submitting all required reports to Manitoba Conservation as specified in the Environment Act Licence. [10]

However, A FIPPA request for reports of testing their emergency response plan and reports following the implementation of the emergency response plan returned the following result:

Be advised that records of testing the plans or reports following incidents requiring activation of these plans do not exist. [28]

Presumably, the fire started at Sun Gro on June 1, 2024 (Section 5), required implementation of Sun Gro's emergency response plan. Where is that report?

Other documents intended for the public registry are also unavailable:

Reporting in the context of environmental assessment follow-up includes documentation and communication that mitigation measures and follow-up are implemented and whether or not they have been effective. Such reports are normally required by the Manitoba Conservation Environment Act Licence and are placed in the public registry for the project. [10]

Do these reports exist?

### *Recommendations*

All of the cottage areas on the Washow Bay Peninsula should be included as stakeholders in every EAP filed for the area.

MNR should advocate for its cottage areas. That's one of the responsibilities of a municipal authority. MNR should be included in the TAC for EAPs submitted near the cottage areas under its authority and

it should forcefully oppose the development of industries which harm the environment, recreational opportunities, and the cottage areas themselves.

Information on the safety and environmental effects of peat mines should be publicly available through a mechanism other than FIPPA. Unnecessary firewalling of information breeds distrust, and hampers the public's ability to evaluate and address problems. This includes water sampling results, measurements of air quality, and all reports filed by the peat mine companies. The public registry, if it is well-maintained, is a suitable location for these files.

The public registry should be maintained regularly. All files related to peat mine projects should be available as expected from ECC's guidelines and peat mine company documents.



## 8 Public Involvement in the EAP Process

Since the beginning of the expansion of peat mining on the Washow Bay Peninsula in 2010, residents and cottagers have opposed peat mining in the Interlake because of its potential negative impacts on Lake Winnipeg, its commercial and recreational fisheries, infrastructure, and its cottage and recreational areas. No changes to the licence conditions were made. No changes to the mitigation conditions were made. Insufficient maintenance of infrastructure was undertaken. Now, peat is accumulating on Lake Winnipeg's shoreline, P. R. 234 is in its worst condition ever, and a fire at Sun Gro has destroyed cottages in Beaver Creek Provincial Park. Yet, the mitigation measures proposed for Sun Gro's Sugar Creek project [1] are essentially the same as for its Ramsay Point project [10], written in 2011. It is the EAB's responsibility to ensure that Sun Gro and the other peat mining companies in the area are good neighbors.

The Information Bulletin on Environmental Assessment and Licensing under The Environment Act states:

The [EAL] process exists to ensure environmental and human health protection, encourage early consultation, allow for full public participation, and ensure economic development occurs in an environmentally responsible manner. [29]

Yet, this document does not describe meaningful opportunities for the public to interact with the EAL contact or the TAC who will be evaluating the EAP. Aside from posting public comments on the public registry after the 30-day consultation period is over, there is no mention of how they will be incorporated into the decision-making process. Public responses to EAPs aren't given enough consideration in the EAL process.

The flow chart of EAL process [30] shows that all public comments are filtered through the project's EAL contact. It is at his/her sole discretion whether any public comments are distributed, in whole or in part, to the technical advisory committee (TAC) who evaluate the EAP and advise the EAL contact. This is not a transparent process with full public participation.

The EAL contact for Sun Gro's Sugar Creek EAP has stated that public comments will not be passed on to the TAC during the EAL process [31]. How can the TAC make appropriate recommendations to the EAB if all they are allowed to see is the EAP, which is written from the perspective of the applicant? Without full access to public comments, the EAL process is biased toward approval without meaningful consultation with negatively affected parties.

The public needs to know how their submissions to the EAL process will be distributed and considered during the evaluation of the EAP. The public needs to see that they were read, considered by the appropriate TAC, and factored into their recommendations. There must be a mechanism to hold the TAC and EAL contact accountable when they fail to take public comments into consideration. As the process is structured today, the public doesn't have access to the TAC comments until the decision has been made.

### *Recommendations*

A site visit during review of the EAP, as described in the Information Bulletin [29] is required. The site visit must involve the TAC, the EAL contact, and members of the public, and it must include an evaluation of peat on Lake Winnipeg's shoreline and the dismal state of P. R. 234.

The public should be formally included in the EAL process. Public comments to the EAP must be distributed to the TAC before they write their recommendations. Meetings and/or direct correspondence with TAC before they write their recommendations are required. The public must be able to comment on TAC opinions before their final submission to the EAB. The public must be able to question the project's contact person in the EAB before the final decision is made. These changes will allow the public to explain their concerns to the TAC and EAB who are acting on their behalf, and to evaluate whether their concerns have been appropriately taken into account.

Since there is no such system in place for the evaluation of Sun Gro's present EAP for Sugar Creek, the public's concerns cannot be addressed by the assessment process and a public hearing by the Clean Environment Commission is therefore needed, during which stakeholders' concerns will be evaluated publicly, with their participation.

## 9 References and Notes

- [1] Environment Act Proposal 6236.00, Sun Gro Horticulture Canada Inc., Sugar Creek Bog Peat Harvesting (2024)
- [2] [Petition · Petition to Halt the Expansion of Peat Mining on Lake Winnipeg - Canada · Change.org](#)
- [3] <https://www.winnipegfreepress.com/breakingnews/2024/11/16/proposed-peat-mine-near-lake-winnipeg-sparks-concern>, Winnipeg Free Press and <https://thenarwhal.ca/manitoba-peat-mine-opposition/>, The Narwhal (November 16 2024)
- [4] Environment Act Licence No. 2964ER, Sun Gro Horticulture Canada Inc. (2018)
- [5] Environment Act Licence No. 2288RRR, Sunterra Horticulture (Canada) Inc. (2018)
- [6] Environment Act Licence No. 2969ER, Berger Peat Moss Ltd. (2018)
- [7] Manitoba's Peat Harvest Licences, Manitoba Sustainable Development, Forestry and Peatlands Branch (2017)
- [8] Ramsay Point Technical Advisory Committee Comments (2011)
- [9] Environment Act Proposal 5507.00, Berger Peat Moss Ltd., Deer Lake Bog (2011)
- [10] Environment Act Proposal 4254.10, Sunterra Horticulture, Beaver Point Bog (2011)
- [11] Environment Act Proposal 5496.00, Sun Gro Horticulture, Ramsay Point (2010 )
- [12] Brock Huebner (2024)
- [13] Bill Martin (2019)
- [14] [Fed up with herky-jerky ride, Interlake drivers lobby for new highway – Winnipeg Free Press](#), Winnipeg Free Press (July 25 2024)
- [15] Cumulative effects calculations: (i) The EAPs for Sun Gro (Ramsay point [11] and Sugar Creek [1]), Sunterra [10], and Berger [9] provide an estimated peat production schedule, listing truckloads of peat produced per year, which can be converted to truckloads per day using their expected operating season of April to October. These values can be summed to provide the total number of truckloads per day for all peat mines combined (and multiplied by two to yield truck trips per year for comparison to Manitoba highway traffic data). (ii) Sun Gro's Sugar Creek EAP describes the process of draining the peat fields prior to harvesting, and of the periodical deepening of the drainage ditches, during which the majority of peat is released. From the data provided in Section 2.5.3 (Field Drainage Ditches), it is possible to calculate the volume of water released during these two phases of harvesting and, therefore, the amount of peat released if it contained the maximum allowed total suspended solids (TSS) of 25 mg/L. Data from Sun Gro Ramsay Point [11], Sunterra [10], and Berger [9] allow the amounts of peat they are permitted to release into Lake Winnipeg to be similarly calculated.
- [16] Traffic on Manitoba Highways 2019, Manitoba Infrastructure, Traffic Engineering; University of Manitoba Transport Information Group, Department of Civil Engineering (2020)
- [17] FIPPA request 2425-MTI-0644 - PR 234 Activity Expenditures 2004 to 2024 (2024)
- [18] Manitoba Transportation and Infrastructure 2023 Multi-year Infrastructure Investment Strategy 5-Year Capital Investment Plan (2023)
- [19] [Petition · Immediately rebuild Manitoba Provincial Highway 234 to ensure that the highway is safe - Canada · Change.org](#)
- [20] Pebblestone Beach cottagers (2017 and 2023)
- [21] Environment Act Proposal 5548.00, Sun Gro Horticulture, Hay Point (2011)
- [22] Beaver Creek Fire Investigators Report, Ryan Kopchuk (2020)

- [23] FIPPA request 2425-ECC-0241 Safety Inspections at Sun Gro Ramsay Point (2024)
- [24] FIPPA request 2425-ECC-0642 Emergency Response Plan All Locations, Sun Gro Horticulture Canada Ltd. (2015, 2020)
- [25] Environment and Climate Change Public Registry 5507.00, [Province of Manitoba | Sustainable Development](#) , accessed Nov 11, 2024
- [26] Environment and Climate Change Public Registry 5496.00, [Province of Manitoba | Environment and Climate Change](#) , accessed Nov 11, 2024
- [27] Sun Gro's summary of the Pine Dock stakeholder engagement meeting, April 15th, 2024
- [28] FIPPA request 2425-ECC-0642 - Response Letter, 2024
- [29] Information Bulletin - Environmental Assessment and Licensing under The Environment Act, 2018
- [30] Environmental Assessment and Licensing Process, Manitoba Sustainable Development, [EAL Process flow chart 2017 10.pdf](#), 2017
- [31] Bryce Wood, email correspondence



From: [REDACTED]  
Sent: Monday, November 18, 2024 1:57 PM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Cc: [REDACTED] Premier of Manitoba <premier@manitoba.ca>; minied@mantioba.ca;  
Minister of Transportation and Infrastructure <minmti@manitoba.ca>; Minister of Environment and Climate  
Change <minecc@manitoba.ca>; [REDACTED]  
Subject: Sun Gro Horticulture Canada Ltd Sugar Creek Bog Peat Harvesting File 6236.00-Letter of Opposition  
Importance: High

Greetings Bryce,

I have attached our letter of opposition in response to the Sun Gro peat harvesting application



Mr. Bryce Wood

Environment Officer

Province of Manitoba

November 17, 2024

Re: Sun Gro Horticulture Canada Ltd-Sugar Creek Bog Peat Harvesting- File: 6236.00

Greetings Bryce,

I represent the Mill Creek Cottage Subdivision [REDACTED] I'm sending this correspondence in accordance with the Environmental Act Proposal presented by Sun Gro Horticulture regarding further expansion of peat harvesting along Lake Winnipeg.

We are a lakefront subdivision consisting of 71 titled lots. Our subdivision along with other subdivisions in our vicinity are in once pristine boreal forest. We were also fortunate to have two large expansive, clean sand beaches within the boundaries of our subdivision.

As a result of increased peat harvesting our residents have been forced to endure hazardous travel conditions on PR234 because of heavy truck traffic on a deteriorating road surface, noise pollution, dust pollution, lake water pollution and live in fear of another peat harvesting fire destroying our properties and endangering our lives

Our 71 lot owners have been specifically impacted by the existing expansion of the Sunterra peat harvesting operations adjacent to our subdivision and other peat harvesting operations throughout the area. Although, there was an attempt by Manitoba to have mitigation strategies in place to reduce any negative impacts of peat harvesting to the environment and residents, they are grossly inadequate as conditions in the area continue to rapidly deteriorate.

The following concerns were directed to me from property owners within the Mill Creek subdivision. The

### Condition of Provincial Road 234

As a result of increased heavy truck traffic PR 234 has become almost unusable during and after rain events. The heavy truck traffic leaves the road slimy with huge ruts making travel for passenger vehicles extremely dangerous and in some cases impossible. PR 234 needs to be upgraded to handle the increases in truck traffic associated with the increase in peat harvesting.

Rapid emergency response on deteriorated road conditions would be difficult if not impossible.

The narrow bridges on PR234 require passenger vehicles to yield to the 100 plus transport trucks that use the road daily.

There is no cellular service available while traveling on PR 234. When vehicles are forced into the ditch or become stuck on the road, travellers must rely on passing vehicles to call for assistance when they reach an area where cellular service is available.

Also, the speed in which the transport trucks pass vehicles on narrow slippery sections, forces vehicles onto the soft road shoulder. There have also been many reports of vehicle damage from the flying rocks and debris from these speeding transport vehicles.

### Noise Pollution

The Mill Creek subdivision is directly across the road from the Sunterra peat harvesting operation. Our subdivision is now exposed to the industrial type of noise associated with an expanded large-scale peat harvesting operation. Transport trucks are arriving at the site from both directions. Often drivers are using their engine brakes when slowing down to enter the site. The noise has become so loud that it shakes the windows of the homes in our subdivision. There is also the constant sound of industrial equipment and back-up alarms coming from the site. We have had several unsuccessful attempts to have Sunterra address our noise concerns.

### Dust Pollution

As the Sunterra operation has expanded to both sides of PR234 the Mill Creek Subdivision is exposed to airborne dust blowing off the peat harvest area located on the southern side of the subdivision. Homeowners are now forced to breathe in the fine dust entering their homes through screen windows which also covers the inside of their dwellings.

### Water Pollution

The two large public beaches within the Mill Creek subdivision were pristine just a few years earlier. The beaches are now covered with a thick layer of peat that has made large sections of beach unusable. This is related to the drainage from the peat harvesting areas that don't have adequate provincial oversight to ensure outflow is within the established parameters.



Mill Creek Beaches July7, 2024

### Emergency Preparedness

We had seen a few years earlier with the peat harvesting fire that destroyed several cottages inside Beaver Creek Provincial Park, there is a need for enhanced emergency preparedness. This needs to not only involve the peat harvesting companies and the province but also include cottage owners in the pre-planning process. Notification of an approaching fire is almost impossible as cellular networks are unavailable to all subdivisions along PR234

For all the above reasons, the 71 lot owners of the Mill Creek Cottage Subdivision are strongly apposed to any further expansion of peat harvesting operations until Manitoba is better able to mitigate environmental damage and address safety concerns related to the existing peat harvesting operations. In addition, we request Manitoba can ensure our safety through the required upgrades to PR234, increase cellular coverage in the event of a vehicle accident or fire and make cottage owners aware of the emergency notification plans and evacuation procedures in the event of a fire caused by peat harvesting operations.

We are also respectfully requesting a public hearing to allow the communities an opportunity to voice their concerns directly to the provincial government.

Regards,

[Redacted Signature]

Mill Creek Community Cottage Association

Cc [Redacted]

Cc Mill Creek Beaches Cottage Association Cc Hon. Wab Kinew

Cc Honorable Ian Bushie

Cc Hon. Lisa Naylor

Cc Hon. Tracy Schmidt

**From:** [REDACTED]  
**Sent:** Monday, November 18, 2024 9:24 AM  
**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>  
**Subject:** Re Proposed new peat mine north of riverton at the Sugar Creek Bog.

Please do a thorough assessment of this proposal as it appears to us it will have a negative effect on the environment. There are many concerns for wildlife, The health of Lake Winnipeg and the loss of the bog itself. Thank you [REDACTED], Winnipeg Beach, MB



**From:** [REDACTED]  
**Sent:** Monday, November 18, 2024 6:32 PM  
**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>  
**Subject:** EAP 6236.00 Sun Gro Horticulture Sugar Creek Bog Peat Harvesting

To whom it may concern,

I am writing as a concerned citizen to urge you to take immediate action to halt the proposed expansion of peat mining near Lake Winnipeg. This project presents serious environmental risks that will have local impacts to the community and ecosystem, and a global impact by contributing to climate change.

### **Peat Mining and Carbon Emissions**

Peatlands serve as one of the most effective natural carbon sinks on the planet, storing more carbon per hectare than forests. The proposed Sugar Creek peat mine alone is projected to release over 12,201 tons of CO<sub>2</sub> annually—the equivalent of deforesting 6,019 hectares of rainforest over the project's 37-year lifespan. The cumulative effect of all existing and proposed peat mines in the Lake Winnipeg watershed—covering a combined 15,000 hectares—is equivalent to the carbon emissions produced by clear-cutting nearly 120,000 hectares of rainforest. Approving this expansion directly contradicts Manitoba's commitments to climate action and carbon reduction.

### **Wildfire Risk to Local Communities**

Peat mining has already proven detrimental to nearby communities. Peat mining dries out the peat making it much more susceptible to wildfire and far more likely to pose an ignition risk. In 2020, a wildfire near Beaver Creek damaged properties and threatened residents, underscoring the increased fire risks that accompany peat extraction. Despite license conditions intended to mitigate these risks, peat mines have exacerbated fire hazards, and the current EAP does not address sufficient preventive measures. We cannot afford to jeopardize community safety with further expansion.

### **Degradation of Lake Winnipeg**

Lake Winnipeg is already experiencing ecological stress, and peat mining contributes to the problem. The sedimentation ponds and drainage systems in place have been ineffective, as seen by the peat effluent that pollutes lake beaches. This impacts water quality and harms the lake's aquatic ecosystems, which provide vital resources for local communities and wildlife. Allowing additional peat mining along Lake Winnipeg threatens not only our waterways but also Manitoba's tourism, fishing, and recreational industries that depend on a healthy lake environment.

### **Failure of Reclamation Efforts**

While the proposal promises site reclamation following peat extraction, successful restoration of peatlands to their original carbon-storing capacity remains highly uncertain. Reclamation efforts have repeatedly fallen short in restoring natural ecosystems. Without effective and verifiable restoration methods, the proposed peat mining would lead to permanent environmental damage.

### **Request for Action**

In light of these pressing concerns, I urge you to advocate against the Sugar Creek peat mining expansion and similar projects along Lake Winnipeg. Our province should prioritize sustainable alternatives that preserve Manitoba's natural landscapes and align with our climate commitments.

Please, for the health of our communities, our lake, and our environment, halt the expansion of peat mining along Lake Winnipeg.

Thank you for your attention to this critical issue. I would be grateful for any information on how your office plans to address these concerns.

Sincerely,

[REDACTED]



**From:** [REDACTED]  
**Sent:** Monday, November 18, 2024 6:08 PM  
**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>  
**Subject:** EAP 6236.00 Sun Gro Horticulture Sugar Creek Bog Peat Harvesting

To whom it may concern,

I am writing as a concerned citizen to urge you to take immediate action to halt the proposed expansion of peat mining near Lake Winnipeg. As outlined in Sun Gro Horticulture's Environmental Act Proposal (EAP) for the Sugar Creek sub-areas, this project presents serious environmental risks that will impact both our local communities and Manitoba's natural resources for generations to come.

### **Peat Mining and Carbon Emissions**

Peatlands serve as one of the most effective natural carbon sinks on the planet, storing more carbon per hectare than forests. The proposed Sugar Creek peat mine alone is projected to release over 12,201 tons of CO<sub>2</sub> annually—the equivalent of deforesting 6,019 hectares of rainforest over the project's 37-year lifespan. The cumulative effect of all existing and proposed peat mines in the Lake Winnipeg watershed—covering a combined 15,000 hectares—is equivalent to the carbon emissions produced by clear-cutting nearly 120,000 hectares of rainforest. Approving this expansion directly contradicts Manitoba's commitments to climate action and carbon reduction.

### **Wildfire Risk to Local Communities**

Peat mining has already proven detrimental to nearby communities. In 2020, a wildfire near Beaver Creek damaged properties and threatened residents, underscoring the increased fire risks that accompany peat extraction. Despite license conditions intended to mitigate these risks, peat mines have exacerbated fire hazards, and the current EAP does not address sufficient preventive measures. We cannot afford to jeopardize community safety with further expansion.

### **Degradation of Lake Winnipeg**

Lake Winnipeg is already experiencing ecological stress, and peat mining contributes to the problem. The sedimentation ponds and drainage systems in place have been ineffective, as seen by the peat effluent that pollutes lake beaches. This impacts water quality and harms the lake's aquatic ecosystems, which provide vital resources for local communities and wildlife. Allowing additional peat mining along Lake Winnipeg threatens not only our waterways but also Manitoba's tourism, fishing, and recreational industries that depend on a healthy lake environment.

### **Failure of Reclamation Efforts**

While the proposal promises site reclamation following peat extraction, successful restoration of peatlands to their original carbon-storing capacity remains highly uncertain. Reclamation efforts have repeatedly fallen short in restoring natural ecosystems. Without effective and verifiable restoration methods, the proposed peat mining would lead to permanent environmental damage.

### **Request for Action**

In light of these pressing concerns, I urge you to advocate against the Sugar Creek peat mining expansion and similar projects along Lake Winnipeg. Our province should prioritize sustainable alternatives that preserve Manitoba's natural landscapes and align with our climate commitments.

Please, for the health of our communities, our lake, and our environment, halt the expansion of peat mining along Lake Winnipeg.

Thank you for your attention to this critical issue. I would be grateful for any information on how your office plans to address these concerns.  
Sincerely [REDACTED]

--

[REDACTED]



**From:** [REDACTED]

**Sent:** Monday, November 18, 2024 8:15 PM

**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>

**Subject:** FW: EAP 6236.00 Sun Gro Horticulture Sugar Creek Bog Peat Harvesting

Dear Mr. Wood:

I am writing as a concerned citizen to urge you to take immediate action to halt the proposed expansion of peat mining near Lake Winnipeg. As outlined in Sun Gro Horticulture's Environmental Act Proposal (EAP) for the Sugar Creek sub-areas, this project presents serious environmental risks that will impact both our local communities and Manitoba's natural resources for generations to come.

**Peat Mining and Carbon Emissions**

Peatlands serve as one of the most effective natural carbon sinks on the planet, storing more carbon per hectare than forests. The proposed Sugar Creek peat mine alone is projected to release over 12,201 tons of CO<sub>2</sub> annually—the equivalent of deforesting 6,019 hectares of rainforest over the project's 37-year lifespan. The cumulative effect of all existing and proposed peat mines in the Lake Winnipeg watershed—covering a combined 15,000 hectares—is equivalent to the carbon emissions produced by clear-cutting nearly 120,000 hectares of rainforest. Approving this expansion directly contradicts Manitoba's commitments to climate action and carbon reduction.

**Wildfire Risk to Local Communities**

Peat mining has already proven detrimental to nearby communities. In 2020, a wildfire near Beaver Creek damaged properties and threatened residents, underscoring the increased fire risks that accompany peat extraction. Despite license conditions intended to mitigate these risks, peat mines have exacerbated fire hazards, and the current EAP does not address sufficient preventive measures. We cannot afford to jeopardize community safety with further expansion.

**Degradation of Lake Winnipeg**

Lake Winnipeg is already experiencing ecological stress, and peat mining contributes to the problem. The sedimentation ponds and drainage systems in place have been ineffective, as seen by the peat effluent that pollutes lake beaches. This impacts water quality and harms the lake's aquatic ecosystems, which provide vital resources for local communities and wildlife. Allowing additional peat mining along Lake Winnipeg threatens not only our waterways but also Manitoba's tourism, fishing, and recreational industries that depend on a healthy lake environment.

**Failure of Reclamation Efforts**

While the proposal promises site reclamation following peat extraction, successful restoration of peatlands to their original carbon-storing capacity remains highly uncertain. Reclamation efforts have repeatedly fallen short in restoring natural ecosystems. Without effective and verifiable restoration methods, the proposed peat mining would lead to permanent environmental damage.

**Request for Action**

Considering these pressing concerns, I urge you to recommend against the Sugar Creek peat mining expansion and similar projects along Lake Winnipeg. Our province should prioritize sustainable alternatives that preserve Manitoba's natural landscapes and align with our climate commitments.

Thank you for your attention to this critical issue. I would be grateful for any information on how your office plans to address these concerns.

Sincerely,

[REDACTED]

**From:** [REDACTED]  
**Sent:** Monday, November 18, 2024 6:09 PM  
**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>  
**Subject:** EAP 6236.00 Sun Gro Horticulture Sugar Creek Bog Peat Harvesting

To whom it may concern,

I am writing as a concerned citizen to urge you to take immediate action to halt the proposed expansion of peat mining near Lake Winnipeg. As outlined in Sun Gro Horticulture's Environmental Act Proposal (EAP) for the Sugar Creek sub-areas, this project presents serious environmental risks that will impact both our local communities and Manitoba's natural resources for generations to come.

#### Peat Mining and Carbon Emissions

Peatlands serve as one of the most effective natural carbon sinks on the planet, storing more carbon per hectare than forests. The proposed Sugar Creek peat mine alone is projected to release over 12,201 tons of CO<sub>2</sub> annually—the equivalent of deforesting 6,019 hectares of rainforest over the project's 37-year lifespan. The cumulative effect of all existing and proposed peat mines in the Lake Winnipeg watershed—covering a combined 15,000 hectares—is equivalent to the carbon emissions produced by clear-cutting nearly 120,000 hectares of rainforest. Approving this expansion directly contradicts Manitoba's commitments to climate action and carbon reduction.

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Peat mining has already proven detrimental to nearby communities. In 2020, a wildfire near Beaver Creek damaged properties and threatened residents, underscoring the increased fire risks that accompany peat extraction. Despite license conditions intended to mitigate these risks, peat mines have exacerbated fire hazards, and the current EAP does not address sufficient preventive measures. We cannot afford to jeopardize community safety with further expansion.

#### Degradation of Lake Winnipeg

Lake Winnipeg is already experiencing ecological stress, and peat mining contributes to the problem. The sedimentation ponds and drainage systems in place have been ineffective, as seen by the peat effluent that pollutes lake beaches. This impacts water quality and harms the lake's aquatic ecosystems, which provide vital resources for local communities and wildlife. Allowing additional peat mining along Lake Winnipeg threatens not only our waterways but also Manitoba's tourism, fishing, and recreational industries that depend on a healthy lake environment.

#### Failure of Reclamation Efforts

While the proposal promises site reclamation following peat extraction, successful restoration of peatlands to their original carbon-storing capacity remains highly uncertain. Reclamation efforts have repeatedly fallen short in restoring natural ecosystems. Without effective and verifiable restoration methods, the proposed peat mining would lead to permanent environmental damage.

#### Request for Action

In light of these pressing concerns, I urge you to advocate against the Sugar Creek peat mining expansion and similar projects along Lake Winnipeg. Our province should prioritize sustainable alternatives that preserve Manitoba's natural landscapes and align with our climate commitments.

Please, for the health of our communities, our lake, and our environment, halt the expansion of peat mining along Lake Winnipeg.

Thank you for your attention to this critical issue. I would be grateful for any information on how your office plans to address these concerns.

Sincerely,

A large black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**Sent:** Monday, November 18, 2024 6:38 PM  
**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>  
**Subject:** EAP 6236.00 Sun Gro Horticulture Sugar Creek Bog Peat Harvesting

To whom it may concern,

I am writing as a concerned citizen to urge you to take immediate action to halt the proposed expansion of peat mining near Lake Winnipeg. As outlined in Sun Gro Horticulture's Environmental Act Proposal (EAP) for the Sugar Creek sub-areas, this project presents serious environmental risks that will impact both our local communities and Manitoba's natural resources for generations to come.

#### Peat Mining and Carbon Emissions

Peatlands serve as one of the most effective natural carbon sinks on the planet, storing more carbon per hectare than forests. The proposed Sugar Creek peat mine alone is projected to release over 12,201 tons of CO<sub>2</sub> annually—the equivalent of deforesting 6,019 hectares of rainforest over the project's 37-year lifespan. The cumulative effect of all existing and proposed peat mines in the Lake Winnipeg watershed—covering a combined 15,000 hectares—is equivalent to the carbon emissions produced by clear-cutting nearly 120,000 hectares of rainforest. Approving this expansion directly contradicts Manitoba's commitments to climate action and carbon reduction.

#### Wildfire Risk to Local Communities

Peat mining has already proven detrimental to nearby communities. In 2020, a wildfire near Beaver Creek damaged properties and threatened residents, underscoring the increased fire risks that accompany peat extraction. Despite license conditions intended to mitigate these risks, peat mines have exacerbated fire hazards, and the current EAP does not address sufficient preventive measures. We cannot afford to jeopardize community safety with further expansion.

#### Degradation of Lake Winnipeg

Lake Winnipeg is already experiencing ecological stress, and peat mining contributes to the problem. The sedimentation ponds and drainage systems in place have been ineffective, as seen by the peat effluent that pollutes lake beaches. This impacts water quality and harms the lake's aquatic ecosystems, which provide vital resources for local communities and wildlife. Allowing additional peat mining along Lake Winnipeg threatens not only our waterways but also Manitoba's tourism, fishing, and recreational industries that depend on a healthy lake environment.

#### Failure of Reclamation Efforts

While the proposal promises site reclamation following peat extraction, successful restoration of peatlands to their original carbon-storing capacity remains highly uncertain. Reclamation efforts have repeatedly fallen short in restoring natural ecosystems. Without effective and verifiable restoration methods, the proposed peat mining would lead to permanent environmental damage.

#### Request for Action

In light of these pressing concerns, I urge you to advocate against the Sugar Creek peat mining expansion and similar projects along Lake Winnipeg. Our province should prioritize sustainable alternatives that preserve Manitoba's natural landscapes and align with our climate commitments.

Please, for the health of our communities, our lake, and our environment, halt the expansion of peat mining along Lake Winnipeg.



Thank you for your attention to this critical issue. I would be grateful for any information on how your office plans to address these concerns.

Sincerely,

A large black rectangular redaction box covers the signature. To the right of the box, there are two small, vertical yellow rectangular marks, one above the other.

From: [REDACTED]  
Sent: Monday, November 18, 2024 5:52 PM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Subject: Response: EAP 6236.00 Sugar Creek Bog Peat Harvesting

Public Registry 6236.00

## **Sugar Creek Bog Peat Harvesting Sun Gro Horticulture Canada Ltd**

Dear Bryce Wood:

I am writing to urge you to not to approve the proposed expansion of peat mining near Lake Winnipeg. This project presents environmental risks that will impact local communities, **the health of Lake Winnipeg** and release large amounts of CO<sub>2</sub>. Approving this expansion directly contradicts Manitoba's commitments to improving the condition of Lake Winnipeg, environmental stewardship, climate action and carbon reduction.

### **Protect Lake Winnipeg**

Lake Winnipeg is already experiencing ecological stress, and peat mining contributes to the problem. The sedimentation ponds and drainage systems in place have been ineffective, as seen by the peat effluent that pollutes lake beaches. This impacts water quality and harms the lake's aquatic ecosystems, which provide vital resources for local communities and wildlife. Allowing additional peat mining along **Lake Winnipeg** threatens not only our waterways but also Manitoba's tourism, fishing, and recreational industries that depend on a healthy lake environment.

### **Carbon Emissions**

Peatlands serve as one of the most effective natural carbon sinks on the planet, storing more carbon per hectare than forests. The proposed Sugar Creek peat mine alone is projected to release over 12,201 tons of CO<sub>2</sub> annually—the equivalent of deforesting 6,019 hectares of rainforest over the project's 37-year lifespan. The cumulative effect of all existing and proposed peat mines in the Lake Winnipeg watershed—covering a combined 15,000 hectares—is equivalent to the carbon emissions produced by clear-cutting nearly 120,000 hectares of rainforest.

### **Wildfire Risk**

Peat mining has already proven detrimental to nearby communities. In 2020, a wildfire near Beaver Creek damaged properties and threatened residents, underscoring the increased fire risks that accompany peat extraction. Despite license conditions intended to mitigate these risks, peat mines have exacerbated fire hazards, and the current EAP does not address sufficient preventive measures. We cannot afford to jeopardize community safety with further expansion.

### **Failure of Reclamation Efforts**

While the proposal promises site reclamation following peat extraction, successful restoration of peatlands to their original carbon-storing capacity remains unclear. Reclamation efforts have repeatedly fallen short in restoring natural ecosystems. Without effective and verifiable restoration methods, the proposed peat mining would lead to permanent environmental damage.

**Request for Action**

In light of these pressing concerns, I urge you to recommend against the Sugar Creek peat mining expansion and similar projects along Lake Winnipeg. Our province should prioritize sustainable alternatives to peat that preserve Manitoba's natural landscapes and align with our climate commitments.

Please, for the health of our communities, our Lake Winnipeg, and our environment,

**halt the expansion of peat mining.**

Thank you for your attention to this critical issue. I would be grateful for any information on how your office plans to address these concerns.

Sincerely,

[Redacted signature]

[Redacted signature]

[Redacted signature]

[Redacted signature]

To whom it may concern,

I am writing as a concerned citizen to urge you to take immediate action to halt the proposed expansion of peat mining near Lake Winnipeg. As outlined in Sun Gro Horticulture's Environmental Act Proposal (EAP) for the Sugar Creek sub-areas, this project presents serious environmental risks that will impact both our local communities and Manitoba's natural resources for generations to come.

### **Peat Mining and Carbon Emissions**

Peatlands serve as one of the most effective natural carbon sinks on the planet, storing more carbon per hectare than forests. The proposed Sugar Creek peat mine alone is projected to release over 12,201 tons of CO<sub>2</sub> annually—the equivalent of deforesting 6,019 hectares of rainforest over the project's 37-year lifespan. The cumulative effect of all existing and proposed peat mines in the Lake Winnipeg watershed—covering a combined 15,000 hectares—is equivalent to the carbon emissions produced by clear-cutting nearly 120,000 hectares of rainforest. Approving this expansion directly contradicts Manitoba's commitments to climate action and carbon reduction.

### **Wildfire Risk to Local Communities**

Peat mining has already proven detrimental to nearby communities. In 2020, a wildfire near Beaver Creek damaged properties and threatened residents, underscoring the increased fire risks that accompany peat extraction. Despite license conditions intended to mitigate these risks, peat mines have exacerbated fire hazards, and the current EAP does not address sufficient preventive measures. We cannot afford to jeopardize community safety with further expansion.

### **Degradation of Lake Winnipeg**

Lake Winnipeg is already experiencing ecological stress, and peat mining contributes to the problem. The sedimentation ponds and drainage systems in place have been ineffective, as seen by the peat effluent that pollutes lake beaches. This impacts water quality and harms the lake's aquatic ecosystems, which provide vital resources for local communities and wildlife. Allowing additional peat mining along Lake Winnipeg threatens not only our waterways but also Manitoba's tourism, fishing, and recreational industries that depend on a healthy lake environment.

### **Failure of Reclamation Efforts**

While the proposal promises site reclamation following peat extraction, successful restoration of peatlands to their original carbon-storing capacity remains highly uncertain. Reclamation efforts have repeatedly fallen short in restoring natural ecosystems. Without effective and verifiable restoration methods, the proposed peat mining would lead to permanent environmental damage.

### **Request for Action**

In light of these pressing concerns, I urge you to advocate against the Sugar Creek peat



mining expansion and similar projects along Lake Winnipeg. Our province should prioritize sustainable alternatives that preserve Manitoba's natural landscapes and align with our climate commitments.

Please, for the health of our communities, our lake, and our environment, halt the expansion of peat mining along Lake Winnipeg.

Thank you for your attention to this critical issue. I would be grateful for any information on how your office plans to address these concerns.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** Monday, November 18, 2024 10:41 PM  
**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>  
**Subject:** EAP 6236.00 Sun Gro Horticulture Sugar Creek Bog Peat Harvesting

To whom it may concern,

As a concerned citizen I am writing to urge you to take immediate action to halt the proposed expansion of peat mining near Lake Winnipeg. This project outlined in Sun Gro Horticulture's Environmental Act Proposal (EAP) for the Sugar Creek sub-areas presents serious environmental risks that will impact both our local communities and Manitoba's natural resources for generations to come.

### **Manitoba Peat Mining and Carbon Emissions**

Peatlands serve as one of the most effective natural carbon sinks on the planet, storing more carbon per hectare than forests. The proposed Sugar Creek peat mine alone is projected to release over 12,201 tons of CO<sub>2</sub> annually—the equivalent of deforesting 6,019 hectares of rainforest over the project's 37-year lifespan. The cumulative effect of all existing and proposed peat mines in the Lake Winnipeg watershed—covering a combined 15,000 hectares—is equivalent to the carbon emissions produced by clear-cutting nearly 120,000 hectares of rainforest. Approving this expansion directly contradicts Manitoba's commitments to climate action and carbon reduction.

### **Wildfire Risk to Local Communities**

Peat mining has already proven detrimental to nearby communities. In 2020, a wildfire near Beaver Creek damaged properties and threatened residents, underscoring the increased fire risks that accompany peat extraction. Despite license conditions intended to mitigate these risks, peat mines have exacerbated fire hazards, and the current EAP does not address sufficient preventive measures. We cannot afford to jeopardize community safety with further expansion.

### **Degradation of Lake Winnipeg**

Lake Winnipeg is already experiencing ecological stress, and peat mining contributes to the problem. The sedimentation ponds and drainage systems in place have been ineffective, as seen by the peat effluent that pollutes lake beaches. This impacts water quality and harms the lake's aquatic ecosystems, which provide vital resources for local communities and wildlife. Allowing additional peat mining along Lake Winnipeg threatens not only our waterways but also Manitoba's tourism, fishing, and recreational industries that depend on a healthy lake environment.

### **Failure of Reclamation Efforts**

While the proposal promises site reclamation following peat extraction, successful restoration of peatlands to their original carbon-storing capacity remains highly uncertain. Reclamation efforts have repeatedly fallen short in restoring natural ecosystems. Without effective and verifiable restoration methods, the proposed peat mining would lead to permanent environmental damage.

### **Request for Action**

In light of these pressing concerns, I urge you to advocate against the Sugar Creek peat mining expansion and similar projects along Lake Winnipeg. Our province should prioritize sustainable alternatives that preserve Manitoba's natural landscapes and align with our climate commitments.

Please, for the health of our communities, our lake, and our environment, halt the expansion of peat mining along Lake Winnipeg.

Thank you for your attention to this critical issue. I would be grateful for any information on how your office plans to address these concerns.

Sincerely,

[REDACTED]

[REDACTED]



**From:** [REDACTED]  
**Sent:** Tuesday, November 19, 2024 9:32 AM  
**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>  
**Subject:** Stop the Sugar Creek Peat Mine and Protect Lake Winnipeg

To whom it may concern,

I am writing as a concerned citizen to urge you to take immediate action to halt the proposed expansion of peat mining near Lake Winnipeg. As outlined in Sun Gro Horticulture's Environmental Act Proposal (EAP) for the Sugar Creek sub-areas, this project presents serious environmental risks that will impact both our local communities and Manitoba's natural resources for generations to come.

### **Peat Mining and Carbon Emissions**

Peatlands serve as one of the most effective natural carbon sinks on the planet, storing more carbon per hectare than forests. The proposed Sugar Creek peat mine alone is projected to release over 12,201 tons of CO<sub>2</sub> annually—the equivalent of deforesting 6,019 hectares of rainforest over the project's 37-year lifespan. The cumulative effect of all existing and proposed peat mines in the Lake Winnipeg watershed—covering a combined 15,000 hectares—is equivalent to the carbon emissions produced by clear-cutting nearly 120,000 hectares of rainforest. Approving this expansion directly contradicts Manitoba's commitments to climate action and carbon reduction.

### **Wildfire Risk to Local Communities**

Peat mining has already proven detrimental to nearby communities. In 2020, a wildfire near Beaver Creek damaged properties and threatened residents, underscoring the increased fire risks that accompany peat extraction. Despite license conditions intended to mitigate these risks, peat mines have exacerbated fire hazards, and the current EAP does not address sufficient preventive measures. We cannot afford to jeopardize community safety with further expansion.

### **Degradation of Lake Winnipeg**

Lake Winnipeg is already experiencing ecological stress, and peat mining contributes to the problem. The sedimentation ponds and drainage systems in place have been ineffective, as seen by the peat effluent that pollutes lake beaches. This impacts water quality and harms the lake's aquatic ecosystems, which provide vital resources for local communities and wildlife. Allowing additional peat mining along Lake Winnipeg threatens not only our waterways but also Manitoba's tourism, fishing, and recreational industries that depend on a healthy lake environment.

### **Failure of Reclamation Efforts**

While the proposal promises site reclamation following peat extraction, successful restoration of peatlands to their original carbon-storing capacity remains highly uncertain. Reclamation efforts have repeatedly fallen short in restoring natural ecosystems. Without effective and verifiable restoration methods, the proposed peat mining would lead to permanent environmental damage.

### **Request for Action**

In light of these pressing concerns, I urge you to advocate against the Sugar Creek peat mining expansion and similar projects along Lake Winnipeg. Our province should prioritize sustainable alternatives that preserve Manitoba's natural landscapes and align with our climate commitments.

Please, for the health of our communities, our lake, and our environment, halt the expansion of peat mining along Lake Winnipeg.



Thank you for your attention to this critical issue. I would be grateful for any information on how your office plans to address these concerns.

Sincerely,

[REDACTED]

From: [REDACTED]  
Sent: Tuesday, November 19, 2024 12:03 AM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Subject: Sun Gro Horticulture Canada Ltd-Sugar Creek Bog Harvesting- File 6236.00

[REDACTED]

Bryce Wood  
Environmental Approvals Branch  
Manitoba Environment and Climate Change  
Box 35, 14 Fultz Blvd.  
Winnipeg, MB R3Y 0L6  
[Email: Bryce.Wood@gov.mb.ca](mailto:Bryce.Wood@gov.mb.ca)

Re: Sun Gro Horticulture Canada Ltd-Sugar Creek Bog Harvesting- File 6236.00

My name is [REDACTED] I am contacting you today regarding the expansion of SunGro Peat mines.

I am requesting another IISD (International Institute Sustainable Development) report done in the peat mining areas before expansions are approved.

I am more concerned about potential damages to surrounding areas.

\* Peguis First nation is very close to the proposed expansion and already had significant flooding in past years. This plant will affect water absorption in the area and could create more frequent flooding. (Creating costs for Manitoba)

\* Im also concerned with the runoff of the water in Lake Winnipeg as it will be unfiltered; whereas left natural, sphagnum peat moss absorbs and filters the runoff water.

This can cause contaminants in Lake Winnipeg, increasing the risk of algae blooms, ecoli from high levels of iron. Not to mention risks of other heavy metals in the water. (Creating risks for fisheries, drinking water. Shut down of beaches/swimming, etc)

\* There is a high risk a wildfires with peat mining. We know this personally having been affected by the June 1, 2020 wildfire as a cottage owner at Beaver Creek Provincial Park. These peat mines are far too close to our community. The only reason that fire got under control was due to the excellent work of firefighters, which wouldn't have been able to do anything had that fire spread at night!

Wildfires can and have taken out an entire communities. Peguis (The largest First Nations community in Manitoba) is very close to the expansion

\* Let's not forget the land they are planning to expand on is protected moose land. A area that used to be an abundance of moose, deer, etc in the area. KGS and SunGro tried stating the loss of habitat was due to sickness. There is no sickness in that area, the population is low because they are

**unsympathetically**, clear cutting thousands of hectares of land.

I strongly urge the government to take the initiative and protect the land. At the very least another IISD report before allowing them to expand.

I think the risks far outweigh the reward.

Peat mining is not environmental friendly.

\* It releases carbon monoxide onto our environment.

Thousands of tonnes that have been stored for centuries, are being released each year. It is my belief that if all peat mining around the world was halted, we would meet the reduced carbon emissions global goal. That is how much is released each year!

\* For the Environmental Approvals Branch to approve this expansion proposal before doing your due diligence is quite frankly irresponsible.

We urge the Province of Manitoba to deny this application.

And would like to request a hearing to discuss further,

Thank you for your time,

[REDACTED]

From: [REDACTED]  
Sent: Tuesday, November 19, 2024 12:00 AM  
To: Wood, Bryce <Bryce.Wood@gov.mb.ca>  
Subject: Sun Gro's Sugar Creek Peat Harvest, Public Registry File 6236

I'm writing to object to this proposed new peat mine, Sun Gro's Sugar Creek Peat Harvest, Public Registry File 6236.

The draining of peat bogs for harvest begin an immediate release of greenhouse gasses, which is leading to the climate catastrophe we are currently experiencing.

On page 29, it states that this single peat mine will release more than 42,000 tonnes of carbon emissions each year.

Coupled with the Sun Gro's Julius Lake peat mine being proposed and Sun Gro's Evergreen peat mine that was approved in 2023, Sun Gro would move into the large final emitters category in Manitoba. Nearly 2 million tonnes of carbon will be released.

The cumulative impacts of Sun Gro's carbon release from all their operations must be reviewed before any new peat mines can be authorized.

--

[REDACTED]



**From:** [REDACTED]  
**Sent:** November 18, 2024 4:46 PM  
**To:** +WPG569 - Environmental Approvals Branch Director <[EABDirector@gov.mb.ca](mailto:EABDirector@gov.mb.ca)>; Epp, Brad  
<[Brad.Epp@gov.mb.ca](mailto:Brad.Epp@gov.mb.ca)>  
**Cc:** [REDACTED]  
**Subject:** Fisher River Cree Nation Comments on Sun Gro EA Peat Mining Application

Good afternoon,

I am sending the attached comments on behalf of Chief and Council of Fisher River Cree Nation. The copy with the signatures of Chief and Council will follow tomorrow. Please feel free to contact me if you have any questions.

Sincerely,

[REDACTED]



# Fisher River

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## CREE NATION

Agnes Wittman, Director  
Environmental Approvals Branch  
Environment and Climate Change  
Box 35, 14 Fultz Boulevard  
Winnipeg MB R3Y 0L6  
[EABDirector@gov.mb.ca](mailto:EABDirector@gov.mb.ca)

Brad Epp, Director  
Forestry and Peatlands Branch  
14 Fultz Boulevard  
Winnipeg, MB R3Y 0L6  
[brad.epp@gov.mb.ca](mailto:brad.epp@gov.mb.ca)

November 18, 2024

Dear Ms. Wittman and Mr. Epp:

**Re: Sun Gro's Sugar Creek Environment Act Proposal**

Please find attached our preliminary comments on the Environment Act Proposal (EAP) posted late Friday, October 11, 2024 for Sun Gro's Sugar Creek peat mining proposal. These comments are from a previous submission to the Impact Assessment Agency of Canada (IAAC) in which we requested Sun Gro's Sugar Creek Peat Mine proposal be designated under the federal Impact Assessment Act. With respect to that federal submission, we wish to provide the following clarification as the Sun Gro EAP may give a reader unfamiliar with the federal Impact Assessment Act designation process the false impression that the federal government determined there were no issues of concern regarding the proposed Sun Gro peat mine.

What IAAC decided, in fact, was that since Manitoba already has formal environmental review and Indigenous consultation processes in place that can deal with peat mine proposals, there was no need for the federal government to get involved. All of the concerns identified in the submission to IAAC were serious, valid concerns and remain so as it does not appear that Sun Gro's EAP has addressed any of them.

We were not surprised that our request to IAAC was refused as nearly all designation requests to the IAAC minister are denied. Our main purpose, which we accomplished, was to have our concerns formally documented and registered with the federal Impact Assessment Agency, as

Canada has legal fiduciary responsibilities to our Cree Nation with respect to actions that may potentially infringe or impact our treaty and aboriginal rights, or socio-economic conditions.

A second reason for the request was that the federal environmental impact assessment requirements for proponents are far more rigorous and effective than those under the provincial process. The EAP that Sun Gro has now submitted is a glaring example of how inadequate the provincial requirements are for Environment Act Proposals in comparison to IAAC requirements.

A brief scan of the EAP identified numerous areas of concern with Sun Gro's environmental assessments; of special note is the fact that no cumulative effects assessments whatsoever were undertaken. We will conduct a thorough review of Sun Gro's EAP as part of the Crown-FRCN consultation and accommodation process, and will provide further comments at that time. Unfortunately, Forestry and Peatlands Branch (FPB) has advised us that they will be leading the consultation process in collaboration with EAB, and that it will likely be a few months before the consultation will begin. We find this totally unacceptable. The Crown has a duty to consult at the earliest opportunity after becoming aware of a proposal that may affect the rights of Indigenous peoples. FPB has known about the Sun Gro proposal for over two years: they should have initiated Crown consultation with FRCN immediately after the EAP was submitted or preferably much earlier. FPB was also aware of the pending Sun Gro EAP submission to EAB, as Sun Gro communicated the proposal to them in 2023 or earlier. Furthermore, FPB was also aware that Sun Gro had begun stakeholder engagement meetings in early 2024.

Peat mining has literally destroyed what was once pristine boreal wilderness surrounding our community: a wilderness with abundant wetlands, boreal forests and healthy moose and wildlife populations that had remained constant from the time we settled along the Fisher River in 1875, up to the time peat mining began. The Fisher River Cree Nation will no longer tolerate the environmental devastation and the infringement of our inherent and constitutional rights caused by peat mining operations in our Traditional Territory. Our demands are as follows:

1. That the Sun Gro EAP be denied outright, or at a minimum, rejected until Sun Gro provides comprehensive studies and assessments, including cumulative effects assessments (CEA), of potential impacts on environmental valued components and on FRCN's Treaty and Aboriginal rights and socio-economic interests. All studies and impact assessments must include proven mitigation options and reasonable accommodation proposals.
2. That all studies, impact assessments, and mitigation and accommodation proposals referred to in item 1. be subject to a full review by independent experts contracted by FRCN and paid for by Sun Gro and or Manitoba.

3. That if the EAP is not immediately denied or rejected, that the public comments period for the EAP posted on the EAB's Public Registry be left open until the Crown has entered into and completed a meaningful consultation and accommodation process with FRCN. The closing date for comments posted on the Public Registry is currently November 18, 2024. This is unacceptable considering the fact no consultation has taken place with FRCN.
4. That FPB immediately negotiate a fair, legally binding consultation agreement with FRCN, which will include community participation funding to enable FRCN to contract independent environmental experts and consultants.

Regardless of how EAB and FPB decide to proceed, this letter serves as formal notice to Manitoba that no more peat mining operations will be allowed in our Traditional Territory Notice Area without the free, prior and informed consent of the Fisher River Cree Nation.

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Chief [REDACTED]

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Councillor [REDACTED]

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Councillor [REDACTED]

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Councillor [REDACTED]

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Councillor [REDACTED]

cc. The Honourable Wab Kinew, Premier of Manitoba  
Honourable Tracey Schmidt, ECC  
Honourable Ian Bushie, NRIF  
[REDACTED] Consultant

(attachment)





## **MANITOBA ENVIRONMENTAL APPROVALS BRANCH**

### **SUBMISSION**

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**DATE: NOVEMBER 18, 2024**

**SUBJECT: INITIAL COMMENTS ON SUNGRO ENVIRONMENT ACT LICENCE APPLICATION**

#### **INTRODUCTION**

#### **Impacts on the Environment and Infringements on Fisher River Cree Nation's Aboriginal and Treaty Rights, and Socio-Economic Interests**

##### **1. CONTRAVENES THE FEDERAL POLICY ON WETLAND CONSERVATION**

The objective of the Federal Government with respect to wetland conservation is to: *promote the conservation of Canada's wetlands to sustain their ecological and socio-economic functions, now and in the future.*

All of the important Ecological Functions listed in the federal policy apply to the wetlands surrounding FRCN. These include

- water recharge, providing natural purification and storage of freshwater for humans and wildlife
- natural shoreline protection from wave action and erosion
- natural flood reduction and control, through water storage and retention
- important source of oxygen, and a vital element of the natural evapotranspiration and climatic cycles
- habitats for a wide range of waterfowl, flora, furbearers, reptiles and fish
- refugia for rare and endangered species
- preservation of biodiversity and vitality of species
- natural storage base for carbon
- natural sinks for pollutants such as sulphur from acid rain and heavy metals
- nutrient source for connected waters
- soil and water conservation

The proposed peat harvesting projects will impact all of the above ecological functions of the affected wetlands in FRCN's traditional territory, and as such are contrary to the federal policy.

##### **2. GROUNDWATER, SURFACE WATER AND WETLANDS**

The Canadian Institute of Forestry National Electronic Lecture Series 2019 by Marcel Darveau, & Kylie Mcleod of Ducks Unlimited Canada includes these statements:

- ◆ Water may be redistributed between uplands and wetlands through groundwater, surface runoff, and root processes (Devito et al. 2012, Wells et al. 2017)

- ◆ Following harvest (Petrone et al. 2016), regenerating aspen may use adjacent wetlands as water sources; trees from forest lands may lay 'root pipelines' through riparian zones to wetlands to access wetland water sources.
- ◆ Peatlands serve as water reservoirs, providing water to the surrounding landscape during droughts and absorbing extra water during wet years.
- ◆ In many undisturbed peatlands, thick wet soils and moss limit wildfire frequency and prevent deep burning (Johnston et al. 2010, Schiks 2016). Peatlands in their natural state may act as fire breaks. When peatlands undergo drying, warming, or disturbance they may act as fire propagators.

On a local scale, peat extraction significantly alters hydrological and ecological functions, and "...many of the changes are irreversible, such as changes to the soil structure (Okrusko, 1995; Gottlich et al., 1993)". The peat bogs in FRCN's Traditional Territory are unique, ecologically fragile and sensitive areas, and require exhaustive studies in order to understand the linkages between the various eco-systems that make up the Washow-Fisher Peninsula and be able to assess their true values in terms of biodiversity, carbon storage and sequestration, water filtering and flood control.

The interaction between groundwater, surface water, bogs, wetlands, forests, and vegetation is extremely complex and there has been minimal, if any, study done to better understand these interactions. Likewise, there are many wildlife and plant species that depend on, and in some cases are only found in these wetland peat bog areas, some of which are undoubtedly designated species at risk protected under federal legislation. The project area, and in fact the entire Washow-Fisher peninsula is an ecologically sensitive area that needs full protection from peat mining. Any impact on one environmental value component (EVC) can have a domino effect on the other EVCs, and ultimately a devastating cumulative effect on the environment and the FRCN peoples.

Based on consultation with FRCN Elders, Traditional Knowledge holders, Resource Users, and other research, it is the opinion of Chief and Council that any additional peat harvesting in this area will have serious, long-lasting, and likely irreversible adverse effects on the sensitive and fragile natural ecosystems of not only the specific project sites but also the entire peninsula.

An existing operation that began in 1997, 25 years ago, still has not begun any restoration work on their depleted peat areas. In fact, not a single peat company that is actively harvesting in FRCN's territory has begun any restoration work. Even assuming restoration efforts are successful, which is extremely questionable based on comments by Manitoba government experts in 2011 – 2014 peat application reviews, it will likely be 100 years or more before the mined areas will provide any of the ecological values and resources that

have supported the Fisher River Cree Nation and other Indigenous communities for countless generations.

### **3. AQUATICS – FISH AND FISH HABITAT**

Aquatic biota and habitat, particularly fish and fish habitat are protected under the Fisheries Act. The Peat Harvest Lease (PHL) areas are in the midst of the Sugar Creek watershed system which is a major spawning area. The proposed peat harvesting will have significant if not devastating adverse effects on fish habitat and spawning, which is a federal jurisdictional concern. The FRCN community has always been heavily reliant on a healthy and sustainable fishery for both sustenance and income. FRCN members currently hold over 150 commercial fishing quota licences for Lake Winnipeg commercial fishery, making this FRCN's main industry that plays a critical role in sustaining the economic viability of the community.

Fish travel from Lake Winnipeg up the Sugar Creek and its branches. The southern branch connects to the drainage ditch that runs east-west along PR 325 which in turn is intersected by large north-south drainage systems. The northern branch meanders for miles, with the visible stream course eventually disappearing into the vast bogs and wetlands that make up the Sugar Creek watershed. The full extent of the fish migration and spawning areas, and species of fish that use the Sugar Creek system requires comprehensive studies.

### **4. IMPACT ON WILDLIFE**

**Moose:** The significant adverse impacts of peat harvesting on moose migration patterns, populations and habitat became readily apparent in the Washow-Fisher peninsula region after peat harvesting operations opened up in this area. Moose populations decreased to the point where a full moose hunting conservation closure was implemented in the area. The closure applies equally to Indigenous treaty rights holders as well as non-Indigenous hunters. Additional peat operations will further exacerbate an already critical condition.

In addition to avoiding peat harvesting sites for the 30 years of harvest operations, moose will not return to the harvested sites until they are in an advanced stage of restoration, which means that important moose habitat is effectively destroyed for up to 100 years. Furthermore, it is not only the immediate area being harvested that impacts moose and other EVCs; extensive non-licensed areas surrounding the physical operations are also impacted by the noise, commotion and alteration of wetlands, water and in some cases fish and aquatic habitat. In addition, the heavy truck traffic on the more than 100 km of roads that service the operations results in moose avoiding several hundred meters of lands on either side of the roadways.

Moose use wetlands extensively in the summer months and feed on vegetation around marshes, shallow lakes and swamps. Meanwhile, woodland caribou, a threatened species under Canada's federal Species at Risk Act (2002), use peatlands, typically forested peatlands, as refugia from

predators such as wolves and bears. In addition to ungulates, other large mammals such as bears utilize wetlands. Many small mammals also utilize wetlands such as shrews, lemmings, voles, muskrats and beavers. (Ducks Unlimited Canada)

Manitoba has provisions under *the Water rights Act* and Regulation that prohibit the drainage of certain classes of wetlands and imposes penalties and compensation requirements for loss or alteration of other wetland classes. The peat companies are not being required to comply with these rules.

**Birds:** Kingfishers, owls, ospreys and other predators use wetlands to feed, whereas many waterfowl use wetlands as habitat as well as refugia from predators while molting. Many water birds, such as the sandhill crane, use wetlands during migration, as stopover areas to rest and feed, and for nesting habitat.

**Amphibians:** Boreal wetlands provide critical amphibian habitat for several frog species, including boreal chorus frogs, wood frogs and occasionally, leopard frogs. (Ducks Unlimited Canada)

**Other Wildlife:** Local trappers have advised that other wildlife commonly found in peatlands and bogs during the winter trapping season includes wolves, foxes, lynx, rabbits, squirrels, mink, fisher and ermine.

**Medicine Plants:** Wetlands, including peat bogs, are a traditional source of many medicine plants, berries, etc. that are used by FRCN members.

## 5. ECONOMIC IMPACTS

Chief Crate and Council of Fisher River Cree Nation have long recognized the importance of developing a sustainable tourism and recreation-based economy for their community. Their successful efforts working in partnership with the Manitoba government have resulted in the designation of Fisher Bay Provincial Park (FBPP), development of the Bay River Cottage Subdivision, commercial timber harvesting allocations, resource tourism (outfitting and ecotourism) licences are some of the examples of their successful resource-based economic initiatives.

Chief and Council are currently planning the development of a campground on lakefront land owned by FRCN, a tree seedling nursery, and a food security program for the community to grow and harvest their own country foods. The food security program requires that the traditional plants and medicines found in the peat bogs and wetlands are protected in order that traditional gathering practices can continue in a sustainable manner.

The peat mining developments in FRCN's Traditional Territory Notice Area will not only adversely affect FRCN's current economic programs but also plans for new initiatives.



FRCN's community development strategy relies heavily on ecotourism potential and pristine environmental conditions of the region. Peat mining operations are in direct conflict with FRCN's ability to develop its land and economic plans.

## **6. IMPACTS ON SOCIAL AND CULTURAL CONDITIONS**

### **Cultural and Historical Importance**

The Sugar Creek and Ramsay Point areas have been well known for several generations as prime moose habitat, and in fact Ramsay Point is named after John Ramsay who was a famous moose hunter who lived for a time at that point. Ramsay supplied the entire community of Icelandic immigrants at the new Icelandic River settlement (now named Riverton) with moose meat throughout their first winter in 1876. He also showed the Icelanders how to hunt and how to fish through the ice on Lake Winnipeg, as well as other traditional ways to survive in the harsh winters in their New World. It is well documented in numerous history books that without his help, many of the Icelandic settlers surely would have perished during those first bitter cold winters. Sadly, John Ramsay's village at Sandy Bar, situated on the shores of Lake Winnipeg two miles from Icelandic River, was decimated by smallpox and most of the people in the village died, including Ramsay's wife and three of his four children. Ramsay and his surviving daughter Mary moved for a time to Fisher River, Matheson Island and then to what is now officially known as Ramsay's Point.

The purpose in providing this brief history of John Ramsay is to show that in addition to the significant environmental values of the Ramsay Point and Sugar Creek areas, this area also has very important historical and cultural values to not only the FRCN and other Indigenous communities but also to the ancestors of the original Icelandic settlers who continue to this day to honour and pay tribute to John Ramsay, and care for the graves of his wife Betsey and her children.

**Impact on Fisher Bay Provincial Park and Proposed Expansion:** FRCN is currently working in partnership with the Manitoba government, Peguis First Nation and Canadian Parks and Wilderness Society on protected area designations of lands in FRCN's Traditional Territory Notice Area. This project is in advanced stages of consultation and engagement with Indigenous and non-Indigenous communities, municipalities and cottage owners. Increased peat mining will jeopardize this project and severely limit the areas that can be protected.

## **7. IMPACTS ON INFRASTRUCTURE**

Access roads to the various PHL areas will need to be constructed, resulting in further degradation of the lands, wetlands, and fish and wildlife habitat.

## **8. GREENHOUSE GAS AND CLIMATE CHANGE**

## Ecological Goods and Services Value

COUNTING CANADA'S NATURAL CAPITAL: ASSESSING THE REAL VALUE OF CANADA'S BOREAL ECOSYSTEMS

**TABLE 23: SUMMARY OF CANADA'S BOREAL WETLAND ECOSYSTEM SERVICE VALUES (CURRENT ESTIMATED VALUE OF CONSERVING NATURAL CAPITAL IN CANADA'S BOREAL REGION)**

| Type of Good or Service                                                                  | Total Area (hectares)           | Total Value (billions, 2002\$)                                      | Value per Hectare (2002\$)                                           |
|------------------------------------------------------------------------------------------|---------------------------------|---------------------------------------------------------------------|----------------------------------------------------------------------|
| Non-peatland wetland ecosystem values (flood control, water filtering, and biodiversity) | 2,836,800                       | 3.4/year                                                            | 1,189/year                                                           |
| Peatland carbon storage value                                                            | 83,199,800                      | 349.1                                                               | 4,196                                                                |
| Peatland carbon sequestration value                                                      | 83,199,800                      | 0.4/year                                                            | 4.6/year                                                             |
| Peatland flood control and water filtering services                                      | 83,199,800                      | 77.0/year                                                           | 926/year                                                             |
| Total                                                                                    | 86,036,600 (total wetland area) | 349.1 for peatland carbon storage plus 80.6/year in annual benefits | 4,196 for peatland carbon storage plus 2,119/year in annual benefits |

Source: See above sections for sources used to estimate values for peatlands and non-peatland wetland values.

The above table from Counting Canada's Natural Capital: Assessing the Real Value of Canada's Boreal Systems by Mark Anielski and Sara Wilson, the Pembina Institute shows the value of wetlands and of peatlands. The values are in terms of 2002 dollars so it is expected that those values would be considerably higher in 2022.

### Soil Organic Carbon Estimates in the Fisher River Cree Nation Notice Area

The following is taken from a study prepared for CPAWS Manitoba by Ducks Unlimited Canada in April 2021.

The Fisher River Cree Nation Notice Area watershed comment zones contain an estimated combined 360.7 million tonnes of soil organic carbon, which is equivalent to the emissions of 287.4 million typical passenger vehicles annually (Table 2).

Bogs contribute the most carbon with 112.6 million tonnes followed by 104.3 million tonnes from fens, 67.5 million tonnes from uplands, 61.6 million tonnes from mineral wetlands, and 14.6 million tonnes from open water bodies (Table 3).

Out of the 11 watershed comment zones, zone 1 has the highest soil organic carbon density of 622 tonnes/ha followed by zone 2 and 3 at 583 and 557 tonnes/ha respectively (Table 2). Zones 7, 10, and 11 have the lowest soil organic carbon density at 304, 233, and 263 tonnes/ha respectively (Table 2).

Table 2: Watershed Soil Organic Carbon and Equivalents.

| Watershed<br>Comment Zones | Area           | Soil Organic<br>Carbon | Soil Organic<br>Carbon Density | CO <sub>2</sub> Equivalent | Annual Emissions<br>Equivalent | Emissions Over 20<br>Years Equivalent |
|----------------------------|----------------|------------------------|--------------------------------|----------------------------|--------------------------------|---------------------------------------|
|                            | Hectares       | Tonnes                 | Tonnes/Hectare                 | Tonnes                     | Number of Cars                 | Number of Cars                        |
| 1                          | 18,094         | 11,259,421             | 622                            | 41,277,036                 | 8,973,269                      | 448,663                               |
| 2                          | 40,196         | 23,452,691             | 583                            | 85,977,564                 | 18,690,775                     | 934,539                               |
| 3                          | 23,419         | 13,050,221             | 557                            | 47,842,109                 | 10,400,458                     | 520,023                               |
| 4                          | 114,753        | 49,877,050             | 435                            | 182,849,265                | 39,749,840                     | 1,987,492                             |
| 5                          | 104,897        | 48,594,760             | 463                            | 178,148,389                | 38,727,911                     | 1,936,396                             |
| 6                          | 30,617         | 14,059,632             | 459                            | 51,542,612                 | 11,204,916                     | 560,246                               |
| 7                          | 223,270        | 67,763,202             | 304                            | 248,419,899                | 54,004,326                     | 2,700,216                             |
| 8                          | 95,346         | 41,523,579             | 436                            | 152,225,439                | 33,092,487                     | 1,654,624                             |
| 9                          | 127,829        | 54,700,636             | 428                            | 200,532,531                | 43,594,029                     | 2,179,701                             |
| 10                         | 148,741        | 34,613,810             | 233                            | 126,894,227                | 27,585,702                     | 1,379,285                             |
| 11                         | 7,018          | 1,847,492              | 263                            | 6,772,904                  | 1,472,370                      | 73,619                                |
| <b>Combined Total</b>      | <b>934,180</b> | <b>360,742,492</b>     | <b>386</b>                     | <b>1,322,481,974</b>       | <b>287,496,081</b>             | <b>14,374,804</b>                     |

Table 3: Watershed Soil Organic Carbon by Wetland Type.

| Watershed<br>Comment Zones | Tonnes of Soil Organic Carbon |                    |                   |                   |                   |
|----------------------------|-------------------------------|--------------------|-------------------|-------------------|-------------------|
|                            | Bog                           | Fen                | Open Water        | Mineral Wetland   | Upland            |
| 1                          | 3,992,817                     | 4,811,268          | 220,237           | 1,322,353         | 912,746           |
| 2                          | 15,278,537                    | 1,849,733          | 1,009,389         | 3,467,139         | 1,847,893         |
| 3                          | 8,552,199                     | 856,322            | 738,273           | 1,815,133         | 1,088,293         |
| 4                          | 13,189,809                    | 16,568,960         | 1,148,850         | 14,634,859        | 4,334,571         |
| 5                          | 19,616,355                    | 12,290,946         | 3,327,630         | 8,881,635         | 4,478,193         |
| 6                          | 7,835,982                     | 1,109,777          | 1,873,502         | 1,920,531         | 1,319,839         |
| 7                          | 6,817,799                     | 27,345,703         | 1,474,856         | 11,145,823        | 20,979,021        |
| 8                          | 15,488,327                    | 12,587,024         | 1,868,955         | 7,101,327         | 4,477,945         |
| 9                          | 19,991,980                    | 17,053,743         | 1,834,534         | 8,525,552         | 7,294,828         |
| 10                         | 1,511,991                     | 9,486,233          | 920,569           | 2,801,349         | 19,893,668        |
| 11                         | 386,767                       | 360,403            | 183,412           | 43,590            | 873,319           |
| <b>Combined Total</b>      | <b>112,662,563</b>            | <b>104,320,112</b> | <b>14,600,207</b> | <b>61,659,293</b> | <b>67,500,317</b> |

## 9. CUMULATIVE EFFECTS

Cumulative environmental effects are defined as effects that are likely to result from the proposed project in combination with the effects of other projects or activities that have been or will be carried out in the foreseeable future. Existing projects, activities and decisions that need to be considered in the cumulative effects assessment of impacts to the Fisher River Cree Nation are extensive. Most of these were not considered in previous provincial environment licensing processes.

It is FRCN's opinion that the cumulative effects of existing peat harvesting operations, combined with future developments of existing peat licence areas in the Washow-Fisher Peninsula would be significant and likely irreversible, or at the very least not restorable for well over 100 years. Peat harvesting is not a truly sustainable use of natural resources. The intrinsic economic, cultural and environmental values of the peatlands far outweigh the minimal benefits that the province receives from its very low royalties.

Prepared by: [REDACTED] Consultant [REDACTED]

From: [REDACTED]

Sent: Wednesday, November 20, 2024 4:30 PM

To: Wood, Bryce <Bryce.Wood@gov.mb.ca>

Subject: EAP 6236.00 Sun Gro Horticulture Sugar Creek Bog Peat Harvesting

To whom it may concern,

I am writing as a concerned citizen to urge you to take immediate action to halt the proposed expansion of peat mining near Lake Winnipeg. As outlined in Sun Gro Horticulture's Environmental Act Proposal (EAP) for the Sugar Creek sub-areas, this project presents serious environmental risks that will impact both our local communities and Manitoba's natural resources for generations to come.

### **Peat Mining and Carbon Emissions**

Peatlands serve as one of the most effective natural carbon sinks on the planet, storing more carbon per hectare than forests. The proposed Sugar Creek peat mine alone is projected to release over 12,201 tons of CO<sub>2</sub> annually—the equivalent of deforesting 6,019 hectares of rainforest over the project's 37-year lifespan. The cumulative effect of all existing and proposed peat mines in the Lake Winnipeg watershed—covering a combined 15,000 hectares—is equivalent to the carbon emissions produced by clear-cutting nearly 120,000 hectares of rainforest. Approving this expansion directly contradicts Manitoba's commitments to climate action and carbon reduction.

### **Wildfire Risk to Local Communities**

Peat mining has already proven detrimental to nearby communities. In 2020, a wildfire near Beaver Creek damaged properties and threatened residents, underscoring the increased fire risks that accompany peat extraction. Despite license conditions intended to mitigate these risks, peat mines have exacerbated fire hazards, and the current EAP does not address sufficient preventive measures. We cannot afford to jeopardize community safety with further expansion.

### **Degradation of Lake Winnipeg**

Lake Winnipeg is already experiencing ecological stress, and peat mining contributes to the problem. The sedimentation ponds and drainage systems in place have been ineffective, as seen by the peat effluent that pollutes lake beaches. This impacts water quality and harms the lake's aquatic ecosystems, which provide vital resources for local communities and wildlife. Allowing additional peat mining along Lake Winnipeg threatens not only our waterways but also Manitoba's tourism, fishing, and recreational industries that depend on a healthy lake environment.

### **Failure of Reclamation Efforts**

While the proposal promises site reclamation following peat extraction, successful restoration of peatlands to their original carbon-storing capacity remains highly uncertain. Reclamation efforts have repeatedly fallen short in restoring natural ecosystems. Without effective and verifiable restoration methods, the proposed peat mining would lead to permanent environmental damage.

### **Request for Action**

In light of these pressing concerns, I urge you to advocate against the Sugar Creek peat mining expansion and similar projects along Lake Winnipeg. Our province should prioritize sustainable alternatives that preserve Manitoba's natural landscapes and align with our climate commitments.

Please, for the health of our communities, our lake, and our environment, halt the expansion of peat mining along Lake Winnipeg.

Thank you for your attention to this critical issue. I would be grateful for any information on how your office plans to address these concerns.

Sincerely,





# Memorandum

Date: January 8, 2025

To: Bryce Wood  
Environmental Approvals Branch  
Environment and Climate Change  
14 Fultz Blvd.  
Winnipeg, MB R3Y 0L6

From: Kim Kmet  
Environmental Compliance and Enforcement  
Environment and Climate Change  
Box 6000  
Gimli MB R0C 1B0

**SUBJECT: Environment Act Proposal - Client File 6236.00 – Sun Gro  
Horticulture Canada Ltd. - Sugar Creek Bog Peat Harvesting**

Environmental Compliance and Enforcement has reviewed the Environment Act Proposal (EAP) and has the following noted concerns:

- Page 6, 2.5.5 Outlet Ditch – The report states the control culvert with sliding gate can be used to reduce or stop discharge in the event of a major precipitation event which exceeds design flow criteria
  - ECE requests a protocol be developed when this would be utilized and address in what manner this could be implemented to utilized management of TSS exceedances
- Page 7, 2.5.7 Staging Area – The report states a building will be equipped with an office and a lunchroom with a septic tank installed and maintained by a local authorized contractor.
  - As per the Onsite Wastewater Management Systems Regulation (M.R. 83/2003), any new onsite wastewater management system must be registered with Environment and Climate Change prior to installation. Please visit [www.gov.mb.ca/onsite](http://www.gov.mb.ca/onsite) or contact an Environment Officer for more information on registration and regulatory requirements for onsite wastewater management systems. (This just an FYI and does not need to be in the EAL)

**From:** +WPG569 - Drinking Water - Approvals <drinkingwater.approvals@gov.mb.ca>  
**Sent:** Thursday, December 5, 2024 1:50 PM  
**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>  
**Subject:** RE: Please comment on the Sugar Creek Bog Peat Harvesting Project - File #6236.00

No concerns.  
Office of Drinking Water (ODW)

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

(pronouns: they/them; please don't use "Mr. Vitt")  
Senior Approvals Engineer  
Office of Drinking Water  
Cell: 204-806-1363  
Email: [Cory.Vitt@gov.mb.ca](mailto:Cory.Vitt@gov.mb.ca)

NEW ADDRESS:  
Box 19  
14 Fultz Blvd  
Winnipeg, MB R3Y 0L6

**From:** Osborne-Anderson, Daniel <Daniel.Osborne-Anderson@gov.mb.ca>  
**Sent:** Wednesday, December 4, 2024 9:29 AM  
**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>  
**Subject:** RE: Please comment on the Sugar Creek Bog Peat Harvesting Project - File #6236.00

Good Morning,

On behalf of Drainage and Water Rights Licencing, there is a concern that class 6, 7 or unimproved organic soils and regulated wetlands will be impacted by this proposal which is likely to have a negative impact on the local drainage conditions. An authorization under the Water Rights Act would not be issued for this type of project. That being said, if the water control works are authorized under the Environment Act there is no requirement for an additional authorization under the Water Rights Act as stated in section 5.1 of the Water Rights Regulation below;

**When licence or registration not required**

**5.1** A person does not require a licence or registration

- (a) to construct, establish, operate or maintain water control works that are the subject of a licence issued under *The Environment Act*;
- (b) to construct, establish, operate or maintain water control works in urban areas, as long as those water control works do not drain class 3, 4 or 5 wetlands or outlet onto areas outside of the urban area; or
- (c) to replace a culvert with a culvert of the same size, as long as there is no change in invert elevation or the location of the culvert.

Thank you,

**Daniel Osborne-Anderson**  
**A/Senior Water Resource Officer**  
**Manitoba Environment & Climate Change**  
**(204) 641-3663**  
**[manitoba.ca/drainage](http://manitoba.ca/drainage)**



**From:** Butterfield, Tamara <Tamara.Butterfield@gov.mb.ca>  
**Sent:** Wednesday, December 4, 2024 9:28 AM  
**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>  
**Cc:** Wiseman, Kylene <Kylene.Wiseman@gov.mb.ca>  
**Subject:** FW: Please comment on the Sugar Creek Bog Peat Harvesting Project - File #6236.00

Good Morning Bryce,

The Drainage and Water Rights Licensing Branch (Water Use Licensing Section) has reviewed the proposal. Based on the project description, should there be a need for dust suppression or fire fighting, a Licence or a Temporary Water Use Permit may be required. There is no threshold for any of these purposes. Applications can be submitted via our online portal – <https://web22.gov.mb.ca/Sso/Account/LogOn>

The proponent can also contact the Water Use Licensing Section at [wateruse@gov.mb.ca](mailto:wateruse@gov.mb.ca) or 204-945-3983 to discuss.

Thanks,

Tamara

Cell 204-918-6273



**Environment and Climate Change**

Box 12, 14 Fultz Blvd., Winnipeg, Manitoba, Canada R3Y 0L6

T 204-945-0002 F 204-948-2357

[www.manitoba.ca](http://www.manitoba.ca)

January 23, 2025

Bryce Wood

Environmental Approvals Branch

Manitoba Environment and Climate Change

Box 35, 14 Fultz Blvd, Winnipeg, MB R3Y 0L6

[bryce.wood@gov.mb.ca](mailto:bryce.wood@gov.mb.ca)

Dear Bryce Wood:

Thank you for the opportunity to review the Sun Gro Horticulture Canada Ltd. (the Proponent) Sugar Creek Bog Peat Harvesting Project Environment Act Proposal (EAP) (File #6236.00), as prepared by KGS Group. Staff in the Water Quality Management Section (WQMS) reviewed the EAP and supplemental materials and would like to offer the following comments from a surface water quality perspective.

In general, the WQMS does not have any major concerns with the EAP. According to the EAP, the potential adverse environmental effects to surface water quality is expected to be minor. However, the WQMS is concerned about the potential for adverse impacts to downstream water quality, including Sugar Creek and Lake Winnipeg, associated with site drainage and harvesting operations. The WQMS would appreciate the opportunity to work with the Proponent, during the licensing process, to develop a surface water quality monitoring program to ensure that downstream aquatic ecosystems are protected. Additional, more detailed, comments are provide below related to concerns with the EAP.

Detailed Comments:

1. Surface water quality monitoring in downstream aquatic environments is required to properly assess the impacts of site drainage and harvesting operations.

The WQMS would appreciate the opportunity to review the Environment Act Licence that is prepared for the Sugar Creek Bog Peat Harvesting Project, including making recommendations on the water quality sampling locations, frequency of sampling, and parameters to be analyzed along with their detection limits.

Some surface water quality monitoring results were presented in the EAP to establish baseline water quality conditions within and nearby the proposed sub-areas. Water samples were collected on July 4, 2022, from five locations. The EAP mentions that these water quality results will form a baseline for comparison of any future surface water sampling at the Sugar Creek sub-areas. However, it is important to note that a single sampling event is not representative of baseline conditions. Additional sampling would be required to better understand the natural variability throughout the seasons. There is considerable variability in water quality results for the duplicate sample. It is recommended that additional monitoring occur throughout 2025/2026 to understand the variability in surface water quality conditions.

Field measurements (pH, dissolved oxygen) and laboratory analyses of the surface water samples suggest exceedances of provincial water quality guidelines and objectives for some parameters (e.g., suspended sediment; total and dissolved metals - aluminum, cadmium, copper, iron, lead, mercury, zinc; nutrients – phosphorus) in one or more of the samples. It will be important to continue to monitor these parameters for changes during site preparation, harvesting operations, and post-harvest. While exceedance of water quality guidelines and objectives may be a common occurrence in natural peatland environments, it is important to continue to monitor to ensure that an increasing trend in concentrations (and loading) does not occur. The elevated concentrations of mercury in the surface water samples are particularly concerning and something to keep an eye on. Altered hydrological regimes and shifting vegetation communities as a result of site drainage and peat harvesting operations are likely to enhance Hg transport from peatlands to downstream aquatic ecosystems. Mercury is a contaminant that may bioaccumulate and/or biomagnify up the food chain; ultimately affecting wildlife and humans.

A review of the surface water quality sampling results indicates that, for some parameters, detection limits were higher than the limits specified in the Manitoba Water Quality Standards, Objectives, and Guidelines. It is recommended that the proponent work with their contracted laboratory to achieve lower detection limits to ensure that guidelines are not exceeded as this could impact key decisions to limit adverse impacts to the environment from site operations.

2. Annual compliance surface water quality reporting should be incorporated into the Environment Act License

It is recommended that the Proponent submit an annual compliance surface water quality monitoring report to the Manitoba Environmental Approvals Branch (EAB). The contents of the report should be agreed upon during the licensing process. Note that the WQMS has reviewed annual compliance surface water quality reports prepared by the Proponent and/or their consultants and issues have been brought forward such as inappropriate comparison to provincial objectives and guidelines, or missing critical information outlined in an Environment Act License.

3. There is no mention of the new Nutrient Targets Regulation in the EAP

On August 23, 2024, the Manitoba government registered the [Nutrient Targets Regulation](#) under [The Water Protection Act](#), establishing nutrient loading targets for the Red, Winnipeg, Saskatchewan, and Dauphin rivers flowing into Lake Winnipeg and nutrient concentration targets for total phosphorus and total nitrogen in Lake Winnipeg. Improving the health of Lake Winnipeg and our waterways are a high priority for the Department of Environment and Climate Change. It is important that the EAB inform the Proponent of the new regulation. The WQMS would be concerned if the concentration and loading of nitrogen or phosphorus discharged to Lake Winnipeg were to increase as a result of peat harvesting operations. Note that the Nutrient Targets Regulation was registered after the submission of the Proponent's EAP, which is likely why this regulation was not discussed.

4. Additional details are required on mitigation measures to address surface water quality concerns

The WQMS recommends water quality monitoring of the sedimentation pond (or effluent discharge) on a weekly basis (for pH and total suspended solids) and seasonally (3x per year) for general chemistry, nutrients, metals, and trace elements. Additional monitoring should be conducted during extreme snowmelt and precipitation events to conduct a proper assessment of contaminants released to the bog surrounding the site. The EAP is proposing monthly samples for pH and total suspended solids.

The use of a gated culvert to manage water flows and contaminant releases is essential. The gate not only allows suspended sediments to settle, but it will also lower the loading of metals, trace elements, and nutrients from the site. It will also help with flooding issues downstream. However, further clarification is required to understand when the gate will be used. Is there research that shows how long it takes for contaminants to settle in a sedimentation pond before release? How long is the Proponent planning to afford contaminants to settle in these ponds? It is recommended that additional details regarding the use of the gated culvert be provided.

The EAP suggests the Proponent will clean drainage ditches and sedimentation ponds on a regular basis. Additional details are required to better understand what will be done with the sediments removed from these locations? Will these sediments be stored and ultimately reused during the closure / restoration phase?

Sincerely,

Digitally signed by  
Andrew Burton  
Date: 2025.01.23  
15:04:48 -06'00'

Andrew Burton



**Comments and Recommendations from Climate Action and Energy Innovation Division on  
ENVIRONMENTAL ACT PROPOSAL FOR DEVELOPMENT OF Sugar Creek Peat Harvesting operated by  
Sun Gro Horticulture Canada Ltd. EAP prepared by KGS - August 16, 2024**

**CAEI comments prepared: January, 2025.**

Following review of the document “**August 16, 2024 : ENVIRONMENTAL ACT PROPOSAL FOR PROPOSED SUN GRO HORTICULTURE CANADA LTD SUGAR CREEK PEAT HARVESTING PROJECT**”, the Climate Action and Energy Innovation Division provides the following comments and recommendations to minimise the carbon footprint of Sun Gro Horticulture Ltd.’s (Sun Gro) peat harvesting operations:

1. The EAP’s projected GHG emissions from equipment and activities involved in Sun Gro peat harvesting operations begin in 2026 and increase every year to a maximum of 7,958 tCO<sub>2</sub>e in each year from 2035 extending through to 2052. No restoration activities are indicated to occur until 2053, which is the first year where projected GHG emissions begin to reduce.

The provided EAP offers minimal detail on intended actions to reduce GHG emissions from operational activities including peat extraction, restoration of peat extracted areas, and the ongoing operation of fossil fuel-fired machinery intended for the proposed operations.

An operational approach that does not include ongoing GHG emission reduction efforts in operations planning departs from requirements requested of other industrial sectors that are now making efforts to reduce carbon emissions associated with their extraction and processing operations. The proponent should manage their operations following the requirements of the **Certification for Responsibly Managed Peatlands**. ([Certification - CSPMA \(peatmoss.com\)](https://peatmoss.com))

From previous studies, land use change (as caused by peatland draining and peat extraction activities) is responsible for about 15% of total lifecycle GHG emissions of peat-mining operations. This is more than peat harvesting and processing (4%) and transportation to market (10%), combined. Land use change is therefore the most significant GHG-generating activity that is directly under the control of the peat-mining company. Implementing enhanced mitigation measures (e.g., improved management of the site hydrology, for example through drain blocking to rewet the peatland site using a variety of techniques including peat dams, plastic piling and bunding, plantation removal, pollution control, sphagnum transfer and/or control of grazing, burning, water quantity and quality, etc.) through a Peatland Management Plan should help to lower GHG emissions. **Due to projected climate changes, their related impacts and to minimize GHG emissions from land use change, CAEI recommends that Sun Gro include GHG mitigation / climate adaptation measures in the proposed Peatland Management Plan and Peatland Recovery Plan for enhanced climate resiliency of its operations.**

It should also be noted that, in addition to methane (CH<sub>4</sub>) and carbon dioxide (CO<sub>2</sub>), peatlands can also act as a source of nitrous oxide (N<sub>2</sub>O), a potent GHG. In an undisturbed state, losses of N<sub>2</sub>O from most peatlands are small. However, drainage and fertilization (depending on chosen post-harvest restoration mode) of peatlands can greatly increase N<sub>2</sub>O emissions, making an important contribution to the overall peatland GHG balance.

Current operational assumptions based on unavoidable and unmanaged GHG emissions will not be sufficient to support Manitoba’s commitment to the newest (announced in January of 2023)

GHG Carbon Reduction Targets set for Manitoba's economic sectors. Also, given Canada's stated objective for net-zero emissions (or carbon neutrality) at the horizon 2050, even relatively small amounts of GHG emissions may have a material impact. **Consequently, CAEI recommends that Sun Gro consider Canada's net-zero aspirations in the development of an emissions reduction strategy.**

**We request an Emissions Reduction Plan to be provided for implementation on proposed operations, with the emissions reduction plan to be updated every 3 years. We also request that the proponent provide an annual emissions report to the province so it can review the effectiveness of Sun Gro's GHG emissions reduction strategy from year to year, as applied to proposed operations.**

2. In accordance with the pertinent Manitoba legislation (please see excerpts below), **CAEI encourages Sun Gro to make peatland protection, conservation, sustainability, and recovery a part of its Peatland Management Plan and Peatland Recovery Plan. Further, Sun Gro is encouraged to also include preserving or restoring disturbed peatlands' carbon-sink function (carbon sequestration), their biodiversity, minimising the release of GHGs into the atmosphere (i.e., combating climate change and global warming), and complying with the requirement of "no net loss of wetland benefits" as part of the above-mentioned plans.**

#### **Excerpts from relevant Manitoba legislation**

The Peatland Stewardship Act states that:

*3(1) The purposes of this Act are (a) to protect and conserve Crown peatland; (b) to regulate the commercial development of peat on Crown peatland to ensure that it is carried out in a sustainable manner; and (c) to ensure that the recovery of Crown peatland takes place.*

*3(2) In administering this Act, regard must be had to the following principles: (a) peatlands play a significant role in storing carbon, preserving biodiversity and maintaining the health of wetlands and ground and surface waters; (b) peatlands that are disturbed or destroyed release carbon into the atmosphere, resulting in increased greenhouse gas emissions.*

The Water Rights Act includes restoring affected wetlands as a condition of issuing a licence.

*5.1(1) Before the minister issues a licence that authorizes activities that would result in the loss or alteration of a prescribed class of wetland, the applicant must have taken one of the actions specified in subsection (2) to ensure that there is no net loss of wetland benefits.*

Carbon sequestration is a wetland benefit that could be lost during harvesting. Sun Gro should monitor carbon sequestration throughout the restoration phase to ensure that restoration is effective and carbon sequestration rates are approaching pre-harvest levels. If not, Sun Gro could be out of compliance with their Water Rights licence and an alternative plan may require consideration through a wetland restoration and enhancement agreement.

3. Projected climate changes are anticipated to bring significant impacts to harvesting and maintenance activities associated with the proposed operations. For example, flooding mitigation measures such as gated culverts and emergency planning are proposed, however given increased rainfall extremes and variability due to climate change, adaptive management of drainage systems will be critical to prevent

local flooding. We recommend the EAP include specific measures for climate adaptation and resilience regarding Sun Gro peat harvesting operations as well as in measures contained within the Environmental Protection Plan Sun Gro is reported to be developing (Section 6.4 on page 48 of the EAP PDF submission).

**Potential climate change impact management measures are listed in Table 15 of the EAP document. Additional details on these measures are requested:**

- a. For the soil quality and integrity component, what were the specific considerations applied to development of the **progressive decommissioning** measures to account for anticipated changes in climate?
- b. For the **drainage component, what extreme rainfall assumptions and projections** were considered to reflect anticipated changes in extreme rainfall events in the operating location?
- c. For the microclimate component, what **specific** mitigation measures will be implemented to respond to impacts resulting to operations from:
  - i. extreme high temperatures,
  - ii. drought conditions, wildfire, and
  - iii. localised flooding from extreme rainfall events in the event on-site drainage is overwhelmed?
- d. For the business opportunities component, what mitigation plans are currently being considered for application to Sun Gro operations to respond to anticipated transitional risks associated with climate change? To what extent has Sun Gro assessed and identified its physical and transitional risks related to this operation? If this these risks have not been assessed, when will these risks be evaluated and prioritized?

**From:** +WPG137 - Parks Circulars <ParksCirculars@gov.mb.ca>

**Sent:** Friday, January 17, 2025 3:06 PM

**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>

**Subject:** RE: Please comment on the Sugar Creek Bog Peat Harvesting Project - File #6236.00

Hello,

Thank you for confirming that comments can be submitted on file #6236.00 until today January 17, 2025.

Parks Branch is concerned about the potential impacts of the proposed activities on the Lake Winnipeg shoreline. Peat sedimentation discharging into Lake Winnipeg has been raised as a concern by Beaver Creek Provincial Park cottage owners. Beaver Creek Provincial Park's primary objective is "to provide outdoor recreational opportunities and experiences in a natural setting."

Parks Branch recommends that Sun Gro utilizes additional mitigation measures of gated culverts in the design of the drainage system to account for possible downstream flooding, major precipitation events and climate change variability throughout the operational lifetime.

Sincerely,

Jessicca Lagimodiere

**Park Ecologist**

Parks Branch | Environment and Climate Change

258 Portage Ave, 4<sup>th</sup> Floor, Box 50, Wpg MB, R3C 0B6

[Jessicca.Lagimodiere@gov.mb.ca](mailto:Jessicca.Lagimodiere@gov.mb.ca) | pronouns: she/her

**ManitobaParks.com**



**From:** Davis, Tim <Tim.Davis@gov.mb.ca>

**Sent:** Friday, January 17, 2025 4:21 PM

**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>

**Cc:** Maksymchuk, Michael <Michael.Maksymchuk@gov.mb.ca>; Brannen, Dennis <Dennis.Brannen@gov.mb.ca>

**Subject:** RE: Please comment on the Sugar Creek Bog Peat Harvesting Project - File #6236.00

Tim Davis

Wildlife Lands Specialist, Wildlife Branch

[Tim.davis@gov.mb.ca](mailto:Tim.davis@gov.mb.ca)

14 Fultz Blvd, Winnipeg, MB

(204) 945-6525

Due to the remote location of the proposed sugar creek peat harvesting area, Wildlife Branch (WB) does not have data on many of the flora and fauna contained in the area. That is not to say there is or is not species of concern in the area only that we do not have data for the area.

One animal population that WB does have information on is moose. Moose populations are at a critical level in game hunting area (GHA) 21A in which this proposal is located. Since 2018, GHA 21A has been under a moose conservation closure which restricts harvest of moose by licenced and indigenous harvesters. Sadly the population has experienced further declines of approximately 66% since the closure was enacted. Previous activities such as collaring and aerial surveys relating to moose populations indicate that moose have been present and utilizing areas adjacent to these proposed harvesting operations and within the peat harvesting licence area. The aerial survey undertaken in early 2024 only had a single occurrence of two individuals along the entire Fisher Bay peninsula. Both individuals were observed near the peat harvesting licence area, east of the proposed harvesting fields. Further fragmentation of the moose habitat through this proposal would likely have negative consequences on our already critical population.

Another key concern of the project would be the increased access it would create. Wildlife branch is not in support of creating all weather roads/trails into key undisturbed habitat within the WMA. Increasing access to the area will likely lead to further declines in the moose population or at least will not aid in the recovery. The preference of the wildlife branch would be for the operation to utilize existing trails if this project is to proceed. If additional trails or roads are created, efforts must be taken to avoid utilization of the road for purposes other than the peat harvesting operation.

Wildlife branch is not in support of development of the peat harvesting area at Sugar Creek as it would have negative effects to the already moose population in the area which is already at a critical level.

Under the Peatlands Stewardship Act, Wildlife Management Areas cannot be used for peat extraction or exploration. The Sugar Creek site was granted a license under transitional provisions when all quarry leases issued under the Mines and Minerals Act were cancelled and converted to Peat Harvest Licenses. The underlying leases were issued in 1996 and not utilized for two decades, and remained unused for a further decade under PHL-4.

Considering the low priority given to developing this project over 30 years, and the vast availability of peatlands located on undesignated crown land in Manitoba, there does not seem to be an economic imperative to allow the peat harvest to proceed in an area designated for wildlife and enjoyment of nature. The ecosystem services provided by peatlands in carbon storage, drainage, and fire management should weigh heavily against the economic value of the peat resource.

The Environment Act application does not reference the Wildlife Act and its regulations when discussing pertinent legislation or permitting requirements. Under the Use of Wildlife Lands Regulation M.R. 99/77, extractive activity is prohibited in a WMA unless authorized.

If the applicant is granted a license, they should obtain a WMA Use Permit before commencing operations.

The project should minimize the impact of increased access by:

- 1) Using existing roads, trails, and corridors;
- 2) Restricting and monitoring access during operational periods;
- 3) Installing barricades to prevent vehicular access outside of operational periods (boulders placed by heavy equipment
- 4) promptly rehabilitating new access.

In order to preserve moose, owl, and eagle habitat in the general operating area, disturbance or clearing of forested area adjacent to the harvest areas should be avoided.

**From:** +WPG569 - Forestry and Peatlands Circulars <FPB.circulars@gov.mb.ca>

**Sent:** Friday, January 10, 2025 9:12 AM

**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>

**Subject:** RE: Please comment on the Sugar Creek Bog Peat Harvesting Project - File #6236.00

Hi Bryce,

Forestry and Peatlands has reviewed the project proposal as follows:

Forestry:

No objections to the activity.

Proponent to maintain contact with Region Forester relating to timber management.

Peatlands:

No objections and provided comments in separate email from Peatlands program lead.

Jane Epp

Comments on the report: Errors and Errata

- Page 11: List of Tables/Figures/Appendices
  - There are only a couple of line items that have page numbers associated with them. All others are missing. For completeness, all items should have associated page numbers.
- Page 15 – Makes reference to the Department of Environment and Climate Change being the responsible authority for the approval of Peatlands Management Plans and Peatlands Recovery Plans.
  - The authority is the Forestry and Peatlands Branch in the Department of Natural Resources and Indigenous Futures.
- Page 18: 2.5.3 Field Drainage Ditches
  - Text reads “the total volume of peat to be drained annually is approximately 1,200,000 m<sup>3</sup>.”
  - Check to ensure that this statement is correct. Is the annual volume of water drained going to be 1.2 million cubic metres of water? Does this mean that the total volume of water that will be drained from the site, over the 37 years of operation, will be 44.4 million cubic metres of water?
- Page 38: 4.2.6.5 Parks, Recreation and Snowmobiling
  - Text states “The Julius Sugar Creek sub-areas are in part within the Moose Creek Provincial Forest.”
  - The mention of “Julius” should be deleted.
- Page 38: 4.2.7 Wildlife Management Areas and Areas of Interest
  - Text states that the Moose Creek WMA overlaps “in part” with the Sugar Creek sub-areas.
  - The Sugar Creek sub-areas overlap completely with Moose Creek WMA, not in part.
- Page 45: 5.3.2 Air Quality
  - Text states that “42,0753 CO<sub>2</sub> eq/yr” will be released, on average, from the project.
  - Should this be “42,073” instead?



**From:** Fedorchuk, Lee <Lee.Fedorchuk@gov.mb.ca>  
**Sent:** Thursday, January 9, 2025 10:33 AM  
**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>  
**Subject:** RE: Sun Gro Julius West and Sugar Creek Advertisements

Lee Fedorchuk  
Lead – Peatlands Program  
Forestry & Peatlands Branch  
14 Fultz Boulevard, Winnipeg, MB R3Y 0L6  
Natural Resources & Indigenous Futures  
(204)782-3485

Comments on the content of the report:

- Page 15 – Sun Gro Horticulture must submit updated Peatlands Management Plans and Peatlands Recovery Plans to Forestry and Peatlands Branch; these updated plans must include the required information on the Sugar Creek sub-areas that Sun Gro Horticulture plans to develop. These documents will be necessary for the Crown-Indigenous consultation process.
- Page 19: 2.5.7 Facility and Equipment Required at Proposed Peat Development Site
  - The staging area that will be used for employee vehicle parking, equipment storage and maintenance will need a Peat Surface Lease.
  - If the area planned for staging is within a provincial forest, then the Forestry and Peatlands Branch can issue a Peat Surface Lease; if not, then Crown Lands Branch is the appropriate issuing authority.
- Page 21: Temporal Boundaries
  - In addition to Environment and Climate Change being satisfied with restoration, Forestry and Peatlands Branch, in the Department of Natural Resources and Indigenous Futures, must be satisfied with the restoration progress. Only when Forestry and Peatlands Branch is satisfied with restoration success is surrender of the license possible.
- Page 21: Other Approvals
  - A list of “other approvals” is provided.
  - The Peat Surface Lease is also required for the planned staging area.
  - Text states a work permit from “Natural Resources and Northern Development” is required. This is now “Natural Resources and Indigenous Futures”.
- Page 27: 4.1.5 Groundwater
  - Text states that “the presence of three registered groundwater well within 5 km of the Sugar Creek sub-areas.”
  - Where are these groundwater wells in relation to the project area? Can a map be provided?
- Page 38: Hunting, Fishing and Trapping
  - This section suggests that hunting within the Moose Creek Provincial Forest and Moose Creek WMA is available to the public for hunting.
  - The project area is located within GHA21, and, at least for moose, hunting is currently closed.

- Page 38: Hunting, Fishing and Trapping
  - Text states that the project area is within Peguis First Nation's Community Interest Zone.
  - Although the disposition for the Sugar Creek sub-areas have already been issued, and therefore TLE selection cannot occur, this may not be the case for the access roads planned. Given that the access road will also be in Peguis's CIZ, it may be necessary to circulate this area to Peguis in accordance with the Treaty Land Entitlement Framework Agreement.
- Page 41: 5.2.2 Loss of Wildlife Habitat
  - The text states that "Based on information provided by Forestry and Peatlands Branch, the decline in moose populations occurring throughout Manitoba is not thought to be due to peat harvesting activities."
  - It would be more correct to state that peat harvesting is not the only thing that can impact moose populations. One of the factors that can influence moose populations is "habitat change", of which peat harvesting activities is included. So, it is not that peat harvesting could *not* impact moose populations, but that it is one, among many, factors influencing moose populations.
- Page 44: 5.2.8 Reclamation and Restoration
  - Text states: "... in accordance with the peatland restoration methods described in CSPMA Peatland Restoration Guide (Quinty and Rochefort, 2003)".
  - There are newer versions of Rochefort's restoration guidelines, published in 2020, which supplement the 2003 version. These are available to download at [www.gret-perg.ulaval.ca](http://www.gret-perg.ulaval.ca).
- Page 44: 5.2.9 Peat Fire
  - Text states that Sun Gro has a 2024 version of its Fire Response Procedures.
  - Please share this document with Forestry and Peatlands Branch, and include details of this document in the Peatlands Management Plan that will be submitted.
- Page 62: 6.5 Recovery Plan
  - Text states that the "PRP will be amended to include additional information regarding the restoration of Sugar Creek sub-areas."
  - Sun Gro Horticulture is reminded that this should be submitted to Forestry and Peatlands Branch, and that these documents will be important for the Crown-Indigenous consultation process.



DATE: January 21, 2025

TO: Bryce Wood, P.Ag.  
Environment Officer - Land Use  
and Forestry Specialist  
Land Use Waste Management,  
and Energy Section  
Environmental Approvals Branch  
Manitoba Environment and Climate  
Change  
Box 35, 14 Fultz Blvd  
Winnipeg, MB R3Y 0L6

FROM: Patrick Watson  
A/Manager  
Lands and Planning Branch  
Natural Resources and Indigenous  
Futures  
Box 25, 14 Fultz Boulevard  
Winnipeg MB R3Y 0L6

PHONE NO.: 204-232-3635

EMAIL: [Patrick.Watson@gov.mb.ca](mailto:Patrick.Watson@gov.mb.ca)

**SUBJECT: Sugar Creek Bog Peat Harvesting Project — Environment Act Proposal - File number 6236.00**

The Lands and Planning Branch of Manitoba Natural Resources and Indigenous Futures has reviewed the Sugar Creek Bog Peat Harvesting Project proposal - File number 6236.00 and has the following comments:

- The Environment Act Proposal (EAP) identifies access to the Peat Harvest Licence (PHL) area through an existing trail. The branch does not have a record of Crown land tenure for the trail, or knowledge of traditional and current trail use.
- To accommodate long-term (>40 years) access to the PHL area, the Lands and Planning Branch recommends that the proponent develops the access road within a Government Road Allowance, north from PR 325.
- Government Road Allowances, by definition, are designated strips of land, typically 99 feet wide, generally reserved for future road construction, situated between properties or boundaries.
- Any new disposition on Crown land within Peguis First Nation Notice Area will require written notification to Peguis First Nation in accordance with Section 5 of the Peguis First Nation Treaty Entitlement Agreement.
- Before initiating any work on Crown land, a Crown Land Work Permit is required. An application form can be found at: <https://manitoba.ca/iem/mines/pubs/app-workpermit.pdf>, and submitted to Krisjan Hepples, Crown Land Specialist for the Central Region at [Krisjan.Hepples@gov.mb.ca](mailto:Krisjan.Hepples@gov.mb.ca).

Patrick Watson  
A/Manager

OA

**From:** Leonen, Leonardo <Leonardo.Leonen@gov.mb.ca>

**Sent:** Wednesday, December 4, 2024 9:13 AM

**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>

**Subject:** RE: Please comment on the Sugar Creek Bog Peat Harvesting Project - File #6236.00

Petroleum Branch has no concerns.

Leo

**DATE:** 2025-01-06

**TO: Bryce Wood**  
 Environmental Officer – Land Use and Forestry  
 Specialist  
 Land Use, Waste management, and Energy  
 Section  
 Environmental Approvals Branch  
 Manitoba Environment and Climate Change  
 Box 35, 14 Fultz Blvd  
 Winnipeg, MB R3Y 0L6

**FROM: Archaeological Assessment Services Unit**  
 Historic Resources Branch  
 Manitoba Sport, Culture, Heritage and Tourism  
 Main Floor – 213 Notre Dame Avenue  
 Winnipeg, MB  
 R3B 1N3

T: (204) 945-2118 F: (204) 948-2384  
 e: HRB.archaeology@gov.mb.ca

**SUBJECT: File: 6236**  
**AAS File: AAS-24-22829**  
**Sugar Creek Bog Peat Harvesting RM of Bifrost-Riverton**

## Conditional approval

Further to your e-mail regarding the above noted application, the Manitoba Historic Resources Branch (HRB) has examined the locations in conjunction with Branch records for areas of potential concern.

*Table 1 Screening Summary*

| Area/<br>project<br>component                                   | Proposed activity                                                                                                                                                                                                                                              | HRB screening and actions to be taken                                                                                                                                                     |
|-----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sugar Creek<br>Bog Peat<br>Harvesting<br>Sub-area B             | <ul style="list-style-type: none"> <li>Independent drainage network</li> <li>a single sediment pond to handle the peatland drainage from the proposed 133.6 ha harvest area (120 m long x 4 m deep)</li> <li>Bog roads</li> </ul>                              | <ul style="list-style-type: none"> <li>Conditional approval               <ul style="list-style-type: none"> <li>Implement an HRPP</li> <li>Can proceed as planned</li> </ul> </li> </ul> |
| Sugar Creek<br>Bog Peat<br>Harvesting<br>Sub-area C,<br>D and E | <ul style="list-style-type: none"> <li>sub-areas C, D and E will have interconnected drainage networks with a common discharge location - four sedimentation ponds will be constructed to be approximately 140 m long x 4 m deep</li> <li>Bog roads</li> </ul> | <ul style="list-style-type: none"> <li>Conditional approval               <ul style="list-style-type: none"> <li>Implement an HRPP</li> <li>Can proceed as planned</li> </ul> </li> </ul> |



**Sub-area B - Conditional approval**

The potential to impact heritage resources is believed to be low based on analysis of current data, therefore, the Historic Resources Branch has no concerns with the proposed project at this time. HRB recommends a HRPP be included in planning, development, and operations, in the event heritage resources (including human remains and palaeontological resources) are accidentally encountered.

**Sub-area C, D and E - Conditional approval**

The potential to impact heritage resources is believed to be low based on analysis of current data, therefore, the Historic Resources Branch has no concerns with the proposed project at this time. HRB recommends a HRPP be included in planning, development, and operations, in the event heritage resources (including human remains and palaeontological resources) are accidentally encountered.

**Changes to current proposed activities and/or footprint**

If any details of the current application undergo modification or if future work necessitates a change to the plans, the applicant is to contact HRB for re-evaluation.

**Legislation**

Under Section 12(2) of [The Heritage Resources Act](#) (the Act), if there is reason to believe that heritage resources or human remains upon or within or beneath lands are likely to be damaged or destroyed by any work, activity, development or project, then the Minister may require a proponent to apply for a heritage permit and conduct at his/her own expense, a heritage resource impact assessment (HRIA) and mitigation, prior to the project's start. As per sections 46 and 51 of the Act, there is an obligation to report any heritage resources and a prohibition on destruction, damage or alteration of said resources.

A Heritage Resource Impact Assessment (HRIA) is an assessment showing the impact that proposed work is likely to have upon heritage resources or human remains. HRIAs must be conducted by a qualified archaeological consultant under a heritage permit. Please find attached a flow chart outlining the general process of an HRIA.

If you have any questions, please contact as above for proper assignment and queueing. Historic Resources

Branch

Archaeological Assessment Services Unit

# Heritage Resources Protection Plan (HRPP) Guidelines

## Purpose of HRPP – Preventative Action:

To assist [insert company name] with informing managers, employees, contractors on what to do and whom to call should heritage resources accidentally be encountered when testing and development is underway on site. The HRPP consists of operational procedures to limit damage or destruction of heritage resources accidentally found during site work.

## Key Steps:

1. All workers on-site should be informed of the HRPP in advance of work proceeding and who to contact should there be a chance encounter during on-site activity.
2. If heritage objects or human remains are discovered on site, activities are to stop at that location immediately and the Historic Resources Branch be notified. ([HRB.archaeology@gov.mb.ca](mailto:HRB.archaeology@gov.mb.ca), (204) 945-2118)
3. In the case of human remains, the nearest law enforcement agency (i.e., RCMP or local police department) must be contacted to first rule out any forensic issues.

## Why Report? :

Many people find heritage objects accidentally. If these items are reported to the Historic Resources Branch, their significance can be assessed and the resulting information can generally be shared with the public. Some heritage objects can be several thousand years old.

## Legislation and Policy:

*The Heritage Resources Act (The Act) and the Province of Manitoba Policy Concerning the Reporting, Exhumation and Reburial of Found Human Remains (Burials Policy) apply to protecting heritage resources.*

## Preparing the HRPP

*These are basic guidelines to help developers draft an HRPP. This is a non-exhaustive guideline involving a single stakeholder. Projects involving multiple stakeholders/ community partners will require more detail.*

*Provide purpose/intent of HRPP to general user.*

*Explicitly state key message/ takeaway for user*

*All on-site workers should be aware of or briefed about the protocol.*

*Introduce the need to report findings.*

*Identify the relevant legislation pertaining to heritage resource protection.*

## What are Heritage Resources? :

Heritage resources and heritage objects are defined under the *Heritage Resources Act*:

"heritage resource" includes

- (a) a heritage site,
- (b) a heritage object, and
- (c) any work or assembly of works of nature or of human endeavour that is of value for its archaeological, palaeontological, pre-historic, historic, cultural, natural, scientific or aesthetic features, and may be in the form of sites or objects or a combination thereof

"heritage object" includes

- (a) an archaeological object,
- (b) a palaeontological object,
- (c) a natural heritage object, and
- (d) an object designated as a heritage object by the Lieutenant Governor in Council under subsection (2);

"archaeological object" means an object

- (a) that is the product of human art, workmanship or use, including plant and animal remains that have been modified by or deposited due to human activities,
- (b) that is of value for its historic or archaeological significance, and
- (c) that is or has been discovered on or beneath land in Manitoba, or submerged or partially submerged beneath the surface of any watercourse or permanent body of water in Manitoba;

"palaeontological object" means the remains or fossil or other object indicating the existence of extinct or prehistoric animals, but does not include human remains.

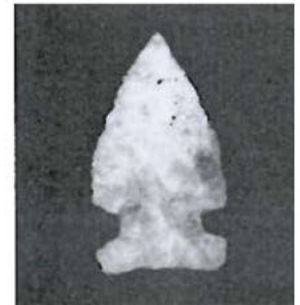
"natural heritage object" means a work of nature consisting of or containing evidence of flora or fauna or geological processes;

"human remains" means remains of human bodies that in the opinion of the minister have heritage significance and that are situated or discovered outside a recognized cemetery or burial ground in respect of which there is some manner of identifying the persons buried therein;

## Notes/Comments

*Provide verbatim definitions of heritage language as presented within The Heritage Resources Act.*

Examples of heritage resource objects (below)



Examples of Archaeological Objects (above)



Example of a Palaeontological Object



### Discovery and notification structure:

*Better safe than sorry: do not hesitate to report potential or suspected finds. The Historic Resources Branch is here to provide advice and expertise at no cost to the developer.*

1. If heritage resources, including human remains are encountered, stop work immediately.
2. Notify the on-site manager about the discovery.  
  
[Insert contact information here, including names, position, and phone numbers]
3. Mark-off area with “flagging tape” to identify and restrict the area.
4. The on-site manager will contact the Historic Resources Branch at (204) 945-2118
5. In the case of possible found human remains, the on-site manager will contact
  - a. Historic Resources Branch at (204) 945-2118
  - b. [Insert local police authority name and contact information here.]

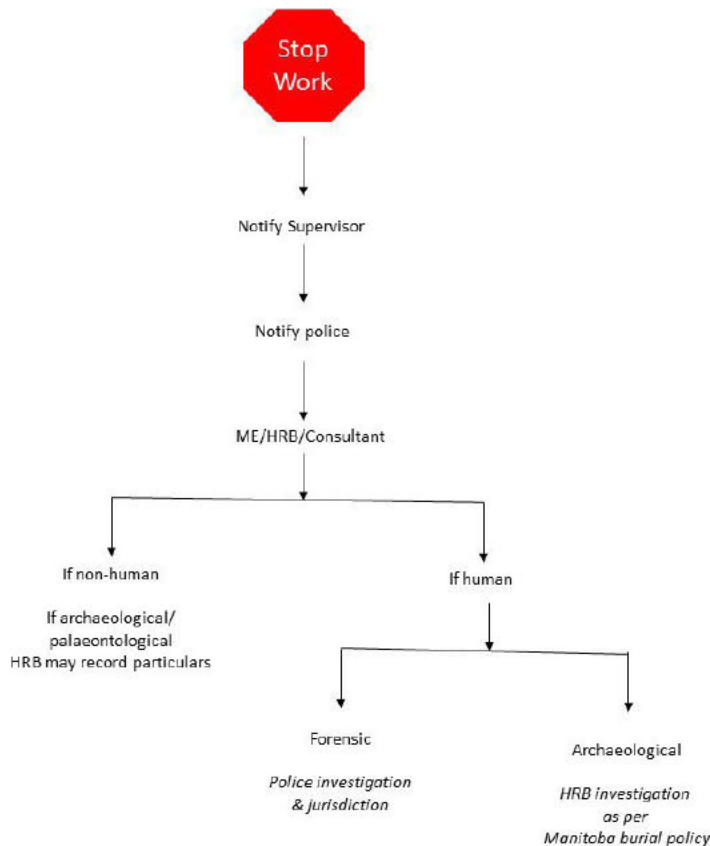
### Notes/Comments

*Provide step-by-step instruction on what to do and who to contact should heritage resources be accidentally encountered.*

- *Who is the site supervisor?*
- *Who do you contact if supervisor is unavailable?*
- *What are the phone numbers for these individuals?*
  
- *What is the name of the local police authority?*
- *What is the phone number during the day and after hours?*

### What to expect after notification for possible found human remains:

1. The local police authority will immediately attend the site and further secure the site.
2. The local police authority may notify the Medical Examiner's (M.E.) Office of a potential case of founding human remains as per *The Fatalities Inquiries Act*.
3. The local police authority and/or the ME's office may contact the Historic Resources Branch (HRB) or their own forensic anthropology consultant.
4. The police and their consultant will determine if the remains are:
  - a. Human or animal
  - b. Forensic or archaeological in nature.
5. If the remains are forensic in nature or cannot be immediately assessed, the police authority and ME will have jurisdiction over the area.
6. If remains are determined to be non-forensic (i.e., archaeological) in nature and their removal is required, HRB will be responsible for their exhumation and reburial as per Manitoba Burial Policy



### Notes/Comments

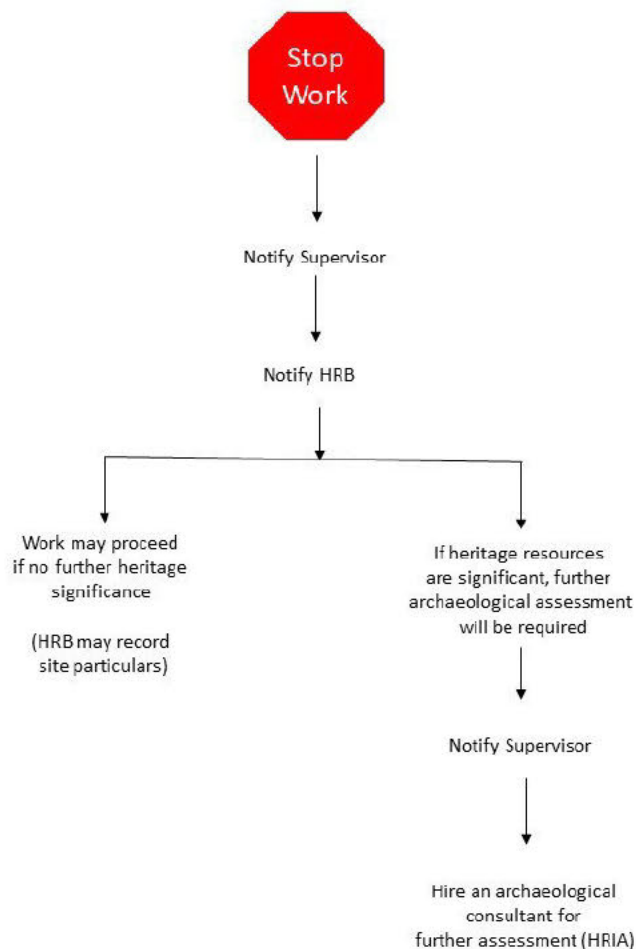
*Under no circumstances should site information be shared with the media or the public. Site locations are protected by the Freedom of Information and Protection of Privacy Act (FIPPA).*

*Communication should be limited to the local police authority or the Historic Resources Branch.*



What to expect after notification for heritage objects other than human remains:

1. The Historic Resources Branch (HRB) will visit the site
2. The HRB will determine if additional heritage mitigation work will be required.
3. If further mitigation work is required, the developer may need to contract a qualified archaeological consultant to conduct a Heritage Resources Impact assessment (HRIA) of the proposed development location, in order to identify and assess any heritage resources that may be negatively impacted by development. If desirable, the Branch will work with the developer/land owners and its consultant to draw up terms of reference for this project.



## Notes/Comments

*The HRB will determine if a heritage resource management strategy needs to be implemented by the developer to mitigate the effects of the development on the heritage resources.*

### Potential penalties

Under the *Manitoba Heritage Resources Act* 69(1), any person who contravenes or fails to observe a provision of this Act or a regulation, order, by-law, direction or requirement made or imposed thereunder is guilty of an offence and liable, on summary conviction, where the person is an individual, to a fine of not more than \$5,000 for each day that the offence continues and, where the person is a corporation, to a fine of not more than \$50,000 for each day that the offence continues.

### Useful Resources:

#### Government of Manitoba

Heritage Objects: A Precious Resource for all Manitobans.  
Winnipeg, Manitoba: Manitoba Culture, Heritage and Citizenship,  
1996. Accessible online at:  
[www.gov.mb.ca/chc/hrb/pdf/heritage\\_objects.pdf](http://www.gov.mb.ca/chc/hrb/pdf/heritage_objects.pdf)

Managing Our Heritage Resources: Impact Assessment. Winnipeg,  
Manitoba: Manitoba Culture, Heritage and Citizenship, 1993.  
Accessible online at:  
[www.gov.mb.ca/chc/hrb/pdf/impact\\_assessment\\_booklet.pdf](http://www.gov.mb.ca/chc/hrb/pdf/impact_assessment_booklet.pdf)

### Notes/Comments

*Identifying potential penalties serves to emphasize the importance of this legislation*

*Additional information about heritage objects or the heritage resource impact assessment process can be found online*

**From:** +SEL1081 - Selkirk CRP <SelkirkCRP@gov.mb.ca>

**Sent:** Thursday, January 9, 2025 11:33 AM

**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>

**Cc:** +SEL1081 - Selkirk CRP <SelkirkCRP@gov.mb.ca>

**Subject:** RE: Please comment on the Sugar Creek Bog Peat Harvesting Project - File #6236.00

Good morning,

I have reviewed Environment Act Proposal File #6236 on behalf of the Community Planning Branch of Manitoba Municipal and Northern Relations. Sun Gro Horticulture Canada Ltd. is seeking an Environment Act licence to construct, operate and recover a peat harvesting development at Sugar Creek bog. The applicant is proposing to conduct peat harvesting on parts of Sections 18, 19, 28 and 29 27-3 EPM and part of Section 29, 30, 31 and 32 26-3 EPM, which is Crown land.

The Planning Act sets out of the legislative framework for land use planning in Manitoba. One of its regulations, the Provincial Planning Regulation, identifies the province's interest in land and resources through the Provincial Land Use Policies (PLUPs). The PLUPs are based on the principles of sound land use planning and are meant to guide ongoing land use and development decisions to ensure they support the province's strategic priorities and prevent undesirable outcomes. While Crown lands are not subject to The Planning Act and its regulations, the legislation states that the province will *give the PLUPs full consideration when undertaking planning activities and making land-use decisions on Crown lands*.

The following PLUPs are applicable:

*4.1.1 Provincial natural land* [such as provincial forests and lands designated as wildlife management areas] *and critical and significant wildlife habitat* [defined as habitat type crucial to the size, distribution or stability of a wildlife species in an area and includes land with a Canada Land Inventory class designation 1, 2, 3 or 4 for wetlands, and habitat important to migratory species and for the maintenance of a wildlife population in a local area] *must be identified and protected from incompatible land uses and developments*.

*4.1.2 If the adverse impacts of development on provincial natural land and critical and significant wildlife habitat cannot be avoided, the impacts must be minimized and mitigated by using appropriate measures to preserve, create or restore the value of the land and habitat.*

*8.1.6 Before establishing a land use that will permit a commercial sphagnum peat most harvesting operation, consideration should be given to such things as access requirements and potential offsite drainage impacts.*

The Community Planning Branch notes the land subject to peat extraction and much of the surrounding Study Area is located within the Moose Lake Wildlife Management Area (WMA) and partially within the Moose Lake Provincial Forest. The WMA supports a variety of species as well as land uses such as nature and wildlife-based recreation, hunting, trapping, and foraging. Per the PLUPs, Provincial Forests and WMAs are to be protected from incompatible land uses and developments. It is not clear if peat harvesting is a compatible land use, therefore our office expresses concern regarding the project's impact on these protected areas. If approval is granted, the impacts must be minimized and mitigated. Our office defers to the departments of Environment and Climate Change, and Natural Resources and Indigenous Futures to advise on methods to minimize impacts and identify appropriate mitigation measures.

Thank you for this opportunity to comment.

**Jessie Russell-Edmonds, MCP** (she/her)

Community Planner

Community Planning Branch

Manitoba Municipal & Northern Relations

103 – 235 Eaton Avenue | Selkirk, MB R1A 0W7

P: (204) 785-5131

**From:** Robinson, Karen <Karen.Robinson@gov.mb.ca>

**Sent:** Wednesday, January 22, 2025 4:07 PM

**To:** Wood, Bryce <Bryce.Wood@gov.mb.ca>

**Cc:** Sturgess, Yvonne <Yvonne.Sturgess@gov.mb.ca>; Hilderman, Tim <Tim.Hilderman@gov.mb.ca>; Benoit, Peter <Peter.Benoit@gov.mb.ca>

**Subject:** RE: Please comment on the Sugar Creek Bog Peat Harvesting Project - File #6236.00

Hi

I have no concerns with this proposal.

Karen

Karen Robinson MD, CCFP, FRCPC

Medical Officer of Health

589 3<sup>rd</sup> Ave South

Stonewall, MB,

R0C 2Z0

Phone: 204-467-4410

Cell: 204-918-1051

**From:** DiNella, Jeff <[Jeff.DiNella@gov.mb.ca](mailto:Jeff.DiNella@gov.mb.ca)>

**Sent:** Thursday, January 16, 2025 12:55 PM

**To:** Wood, Bryce <[Bryce.Wood@gov.mb.ca](mailto:Bryce.Wood@gov.mb.ca)>

**Subject:** RE: Please comment on the Sugar Creek Bog Peat Harvesting Project - File #6236.00

Hi Bryce

We have reviewed EAP 6236 for Sugar Creek Bog Peat Harvesting Project and have the following comments:

- A proposed access road is proposed to connect the harvest site to PR 325. A permits is required from Manitoba Transportation and Infrastructure for the proposed access connection onto PR 325. Permits can be applied for at <https://www.gov.mb.ca/mti/hpd/permits.html>
- The Hodgson Road Drain runs along the north side of PR 325, parallel to the highway. Water then continues easterly to bridge site 482-10 over the Sugar Creek Diversion on PR 234, then into Lake Winnipeg. All drainage from the site shall be reviewed by the Northern Region and Provincial Waterways. Please contact Warren Radbourne, Technical Services Engineer at [Warren.Radbourne@gov.mb.ca](mailto:Warren.Radbourne@gov.mb.ca)) and Provincial Waterway [MITWaterReview@gov.mb.ca](mailto:MITWaterReview@gov.mb.ca) regarding site drainage.
- The proposed truck hauling route from the site to Winnipeg includes PR 325, PR 234 and PTH 8. PR 325 and PR 234 are gravel surfaced roadways which depending on the year, weather and season, the conditions of the gravel surface can deteriorate with the increase in heavy traffic.

Please note the following statutory requirements affecting PR 325, PR 234 and PTH 8.

**Statutory Requirements:**

Under the Transportation Infrastructure Act, a permit is required from Manitoba Transportation and Infrastructure to construct, modify, relocate, remove or intensify the use of an access. A permit is also required from Manitoba Transportation and Infrastructure to construct, modify or relocate a structure or sign, or to change or intensify the use of an existing structure (including the alteration of existing buildings) within **38.1m** (125ft) controlled area from the edge of the highway right-of-way's.

In addition, a permit is required from the Manitoba Transportation and Infrastructure for any planting placed within **15 m** (50 ft) from the edge of the highway right-of-way's.

Please e-mail or call if you have any questions regarding our comments.

Thank You

**Jeff DiNella**

*Senior Development Review Technologist  
Manitoba Transportation and Infrastructure  
Highway Design*

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