

## Technical Advisory Committee Comments - Sun Gro Horticulture Canada Ltd. Evergreen Bog Peat Harvesting

File: 628.10

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DATE: December 8, 2020

TO: Elise Dagdick  
Environmental Approvals  
Conservation and Climate  
1007 Century St.  
Winnipeg MB R3H 0W4

FROM: Eastern Region  
Environmental Compliance and  
Enforcement  
Conservation and Climate  
Unit B – 284 Reimer Avenue  
Steinbach MB R5G 0R5

SUBJECT: Environment Act Proposal – Sun Gro Horticulture – Evergreen Bog Peat Harvesting  
(Client File No. 628.10)

Environmental Compliance and Enforcement Branch, Eastern Region, has reviewed the above noted Environment Act Proposal and does not have any comments to provide at this time

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**Sent:** December-04-20 2:50 PM

**To:** Dagdick, Elise (CC) <Elise.Dagdick@gov.mb.ca>

**Subject:** RE: Request for Review/Comment - Environment Act Proposal – - File 628.10

The eastern region IRMT has the following comments to offer on Environment Act Proposal – File 628.10 - :

- This area is within the Agassiz Provincial Forest and is within an approved area for harvesting within the Eastern Region, Forest Management Unit 24 Timber Sale Plan. A forest harvesting plan will need to be developed in conjunction with Regional Forestry which takes into consideration Provincial Forest timber values within and adjacent to the application area. With seasonal access and winter harvesting within peatland areas as a main driver, it may require a full season or more to accomplish the harvesting plan. As timing is critical, the applicant should contact Regional Forestry as soon as possible to discuss, so that appropriate arrangements are in place to facilitate planned operational timelines.
- A Timber Damage Assessment and Timber Permit may be required based on forest harvesting plan developed.

## Peatlands Program review of Evergreen Bog Peat Harvesting Environmental Act Proposal

November 18<sup>th</sup>, 2020

*Introduction, page 2:* “the proposed development change will require review by the Manitoba Conservation and Climate in accordance with the PHL Guidelines”. This should be Forestry Branch within the Department of Agriculture & Resource Development.

2.3 Existing and Adjacent Land Use, page 3: “This access road terminates approximately 350 north-east of the Evergreen 1 sub-area.” This is likely supposed to be 350 *metres* north-east.

2.5.1 Access Roads, page 4: Recommend that a condition be added to the EAL to follow the Boreal Wetlands Conservation Codes of Practice for all resource and access roads and crossings development.

This condition could be:

“The Licensee will avoid working within or near boreal wetlands. If this is not possible, the Licencee shall, during the planning, construction, operation and decommissioning of resource and access roads and crossings across or adjacent to boreal wetlands, adhere to the mitigation sequence of Avoid, Minimize and Offset as outlined in the Boreal Wetlands Conservation Codes of Practice to achieve a no-net-loss of wetland benefits.”

2.5.7 Schedule of Project Stages and Activities, page 7: My understanding was that Sun Gro is looking for premium peat, and not highly decomposed sedge peat - is it likely that harvesting will occur to the minimum proposed depth of 0.5m given that the peat at these depths would be sedge-dominated peat?

2.7 Other Approvals, page 7: “A General Permit from Crown Lands is required under The Crown Lands Act for the access road.” If it is in a provincial forest, then Forestry Branch can also issue a GP.

2.7 Other Approvals, page 7: “A Timber Appraisal is required to from the Forestry and Peatlands Branch to authorize removal of any timber within the PHL.” The correct Branch name is Forestry Branch.

4.1.5 Groundwater, page 11: “the presence of a single groundwater well within 3 km of the Evergreen 1 sub-area.” How far is within 3 km?

5.2.1 Loss of Wetland, page 24: “Horticultural peat harvesting, in comparison, only accounts for 0.02% (17,000 hectares) of Canada’s total peatland area.” Area under peat harvest has increased in recent years. From a 2017 report by the CSPMA, 30,900 hectares were under harvest – and it has likely increased since that time. Manitoba has approx. 5,400 hectares under harvest (both Crown + private land). In the Northeast Red Watershed District, there are 570 hectares of active peatland harvesting. With the proposed 60 hectares of additional harvest area, that would mean nearly 1% of peatlands under harvest, or 50 times greater than the cited percentage of Canada’s total peatland area.

5.2.4 Release of Greenhouse Gases, page 26: “However, GHG emissions from decomposition are associated with the end use and should not be attributed to the producer.” There is also an argument being put forward from the peat industry that because peat is used to grow other plants – like tree seedlings – that it is not as emissions-heavy when these sequestration effects are taken into account. The industry is currently pursuing a full life-cycle analysis in order to show this. However, when contrasted with the quoted statement above, it seems like the industry is having it both ways. Decomposition of the product should not be associated with them, yet the sequestration effects of their products should.

5.3.2 Air Quality, page 29: “an estimate release of 14,686 t of CO<sub>2</sub>e are expected from land use change.” If the carbon contained within the product itself is included, an additional 192,639 tonnes of CO<sub>2</sub>e would be emitted, which is 1300% higher than the carbon emitted from land use change. This

calculation uses Gorham 1991 method: [Bulk Density] \* [Percent of Carbon] \* [Volume] \* [CO2e Multiplier].

Table 1 - Estimated Peat Production Schedule: The table indicates that an addition 51,000 m<sup>3</sup> of peat will be harvested each year as a result of opening Evergreen 1. With respect to the rest of Sun Gro's PHL#3 operations, what is the overall increase in harvested peat each year? As the other areas are scheduled to begin restoration, the total increase should be less as these sites are retired.

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**Sent:** December-04-20 2:47 PM

**To:** Dagdick, Elise (CC) <Elise.Dagdick@gov.mb.ca>

**Subject:** RE: Request for Review/Comment - Environment Act Proposal – - File 628.10

[Eastern Region Forestry]

This area is within the Agassiz Provincial Forest and is within an approved area for harvesting within the Eastern Region, Forest Management Unit 24 Timber Sale Plan. A forest harvesting plan, will need to be developed in conjunction with Regional Forestry which takes into consideration Provincial Forest timber values within and adjacent to the application area. With seasonal access and winter harvesting within peatland areas as a main driver, it may require a full season or more to accomplish the harvesting plan. It is critical applicant discusses with Regional Forestry as soon as possible so appropriate arrangements are in place to facilitate planned operational timelines. A Timber Damage Assessment and Timber Permit may be required based on forest harvesting plan developed.

In addition to that there is a nearby PSP that needs to be buffered by 200m. Coordinates below.  
Easting 700647  
Northing 5553793

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**Sent:** December-04-20 10:48 AM

**To:** Dagdick, Elise (CC) <Elise.Dagdick@gov.mb.ca>

**Subject:** RE: Request for Review/Comment - Environment Act Proposal – - File 628.10

Similar to the Eastern Region IRMT, we [Wildlife and Fisheries Branch] have no wildlife concerns.

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**Sent:** December-04-20 10:09 AM

**To:** Dagdick, Elise (CC) <Elise.Dagdick@gov.mb.ca>

**Subject:** RE: Request for Review/Comment - Environment Act Proposal – - File 628.10

No concerns with the proposed peat harvesting expansion on Crown Lands.

Thank you,  
Manitoba Municipal Relations

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**Sent:** November-27-20 2:50 PM

**To:** Dagdick, Elise (CC) <Elise.Dagdick@gov.mb.ca>

**Subject:** RE: Request for Review/Comment - Environment Act Proposal – - File 628.10

MI's Roadside Development has the following comments:

The subject area does not have frontage along PTH 44, but the road servicing the operation connects onto PTH 44. The proponent is required to provide the following:

We have some concerns that traffic generated by this development may have an impact on the traffic operations of PTH 44. Therefore, we require the developer to provide some preliminary traffic projections. Please contact Karen Toews at (204) 945-0324 or [Karen.Toews@gov.mb.ca](mailto:Karen.Toews@gov.mb.ca). Based on this information, our department will determine if a more detailed Traffic Impact Study is required. If required, this study is to be prepared by a qualified engineer and will determine what impact the traffic generated by this development will have on the traffic operations at this location and what, if any, on highway improvements will be required.

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**Sent:** November-25-20 4:21 PM

**To:** Dagdick, Elise (CC) <Elise.Dagdick@gov.mb.ca>

**Subject:** RE: Request for Review/Comment - Environment Act Proposal – - File 628.10

Further to this request, separate authorization from the Drainage and Water Rights Licensing Branch is not required. Please see the exemption as taken from the Water Rights Regulation.

**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*;

The branch has reviewed the proposal and has no concerns.

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Impact Assessment  
Agency of Canada

Agence d'évaluation  
d'impact du Canada

Prairie and Northern Region  
Canada Place  
Suite 1145, 9700 Jasper Avenue  
Edmonton, Alberta T5J 4C3

Région des Prairies et du Nord  
Place Canada  
Pièce 1145, 9700 rue Jasper  
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February 12, 2021

Tim North  
Natural Resource Manager  
Sun Gro Horticulture Canada Ltd.  
#52080 Peat Moss Road  
Elma, Manitoba R0E 0Z0  
Email: [Tim.North@sunagro.com](mailto:Tim.North@sunagro.com)

Dear Tim North,

On November 4, 2020, December 18, 2020, and January 6, 2021, the Impact Assessment Agency of Canada (the Agency) received information regarding the Evergreen Bog Peat Harvesting Project (the Project) proposed by Sun Gro Horticulture Canada Ltd.

Based on the current information provided regarding the Project, it does not appear to meet the definition of a designated project as described in the *Physical Activities Regulations* under the *Impact Assessment Act* (the IAA). As such, the Agency has determined that the Project, as presented, is not a designated project under the IAA. However, please note that subsection 9(1) of the IAA gives the Minister of Environment and Climate Change the authority to designate the Project if, in the Minister's opinion, the carrying out of Project activities may cause adverse environmental effects or public concerns related to those effects warrant the designation.

Should the Project or any of the planned activities change, or if you have any further questions, please contact me by email at [chelsea.fedrau@canada.ca](mailto:chelsea.fedrau@canada.ca) or by phone at 780-246-7126.

Sincerely,

Chelsea Fedrau  
Project Manager  
Impact Assessment Agency of Canada

C.c.: Shaun Moffatt, KGS Group

