

Climate and Green Plan Implementation Office
Review of Evergreen Bog Peat Harvesting Environmental Act Proposal
January 15, 2021

In [SunGro's Environment Act Proposal](#) for the Evergreen Bog, they state in section 1.1, page 26: "GHG emissions from decomposition are associated with the end use and should not be attributed to the producer". This doesn't seem right. Can you tell me if this is likely the consultant's opinion, or is this accepted practice when evaluating GHG emissions?

CGPIO recognizes the significance of an empirically-based full life-cycle analysis of GHG emissions and removal (i.e., carbon sequestration or increase in carbon stock) estimates that can be attributed to the project at its every stage- from peat cultivation (land use change), extraction, to processing, transport to market and on-site decomposition of extracted peat. This approach will help determine whether the project as a whole will be a net GHG source or a net GHG sink. However, this life-cycle analysis is at odds to the proponent's claim above that decomposition of the product should not be associated with them, yet the carbon sequestration benefits of their products should.

The proposal also states in this section that "an average year of production at the Evergreen 1 sub-area will account for approximately 0.0002% of the total annual emissions for the country. This quantity of CO2 eq. can be decreased by incorporating mitigation measures to minimize GHG emissions throughout the life cycle of peat harvesting".

The project's estimated total GHG emissions should reflect its relative contribution not only to Canada's but also to Manitoba's annual total GHG emissions to provide a more robust assessment of its potential local impacts and identification of appropriate and measurable mitigation actions. It can be noted though that GHG emissions and removals from the land use, land-use change and forestry (LULUCF) sector are excluded from national totals and are also not currently reflected in the provincial inventory. Notably, the federal government is making good progress in this work.