



MANITOBA ECO-NETWORK

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Comments on Berger Peat Moss Ltd. Horticultural Mix Plant

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

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

Public Engagement

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

Climate Considerations

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

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

Cumulative Impacts

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

Policy Considerations

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

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

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

Sincerely,

Glen Koroluk, Executive Director
Heather Fast, Policy Chair