



# MANITOBA ECO-NETWORK

302 – 583 Ellice Avenue, Winnipeg MB R3B 1Z7

Tel: 204-947-6511 [www.mbeconetwork.org](http://www.mbeconetwork.org)

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Agnes Wittmann  
Director Environmental Approvals Branch  
[Agnes.Wittmann@gov.mb.ca](mailto:Agnes.Wittmann@gov.mb.ca)

Bryce Wood  
Environment and Climate Contact  
[bryce.wood@gov.mb.ca](mailto:bryce.wood@gov.mb.ca)

[publicregistry@gov.mb.ca](mailto:publicregistry@gov.mb.ca)

CC:  
Mike Goffin and Col. Eric Swenson  
Co-Chairs, International Rainy-Lake of the  
Woods Watershed Board  
[rlwwb@ijc.org](mailto:rlwwb@ijc.org)

## **Re: Comments on EAP – Premier Horticulture Ltd. – Poplar Creek Bog Peat Harvesting Expansion**

In this letter, the Manitoba Eco-Network provides comments on Premier Horticulture Ltd.'s proposed Poplar Creek Bog Peat Harvesting Expansion.

We appreciate the ongoing dialogue we have with the Department of Environment and Climate about environmental assessment in Manitoba. We have therefore included some questions that would better help us understand the current assessment process for Premier's proposed Peat Harvesting Expansion. There is a concerning lack of details in the Environment Act Proposal (EAP) that could lead to gaps in the project's technical review. We recommend requesting more information from the proponent to fill gaps before continuing with the assessment process.

We also strongly recommend a public hearing be held, with participant funding, so potentially impacted Indigenous governments and organizations, regulatory bodies (e.g., International Joint Commission), and other governments (e.g., Ontario, USA) can publicly address potential concerns with the proposed development and allow for independent analysis of the EAP.

Overall, the Eco-Network is not convinced that Premier has provided sufficient information to support the approval of their proposed project expansion. The extreme weather events experienced this summer, along with many other impacts of the ongoing climate crisis highlight the need to carefully consider the approval of any activities that will increase Manitoba's GHG emissions, decimate a valuable carbon sink, and impact water quality. A broader discussion about the serious impacts of peat mining that have led to past peat mining moratorium in Manitoba is necessary. Thus, more public information and opportunity for independent review of such information, such as through a public hearing, should be required before the proposed project is allowed to proceed.

## Information in EAP

The Eco-Network regularly reviews EAPs posted on the public registry. Compared to other examples we have seen, Premier's EAP lacked considerable detail in some areas, resulting in significant data gaps. There were also numerous references to a previous EAP prepared in 2010 (when "Jiffy Canada" was the listed proponent), however, the referenced EAP from 2010 does not appear to be available in any related registry files (e.g., File No. 5461.00). This made review of Premier's EAP even more difficult. It is also concerning that there was a lack of information about why previous licences for this project had been rescinded numerous times in the past.

More information should be provided by Premier and added to the public registry before this project progresses further in the assessment process. This includes information about:

- *The location of the project.* Based on the way the project location was described, it was difficult to identify where in Manitoba the project was actually located. To make information about the project more accessible to laypeople and the public, we suggest providing more information in this (and future) EAPs on the location of developments such as the inclusion of detailed maps and more references to identifiable landmarks.
- *Details about previous "discussions with the Manitoba Environmental Approvals Branch".* For example, it would be helpful to know what data was requested by the Department and how the scope of that data was determined.
- *Climate Data.* The data used to establish the "current climate normal" for Poplar Creek Bog ends at 2010 (p. 4-5). It is unclear why a dataset that ended 13 years prior to the submission of the EAP was utilized for this proposed expansion. Human induced GHG intensity is not linear and climate impacts have become more significant over the last decade. A 13 year data gap is no longer acceptable in light of the current climate crisis. We recommend the Department require the proponent to work with Environment Canada and establish its own climate station to record up-to-date data.
- *Potential Impacts.* The potential impacts (see Table 6) are excessively reliant on "new climate observations and projections". Thus, more information is needed about the planned monitoring and adaptive measures that will allow the quick integration of updated information as it becomes available.
- *Adaptation Measures.* There was a missed opportunity in the EAP for Premier to include specific data to reflect on what has been learned based on its existing operation, particularly with respect to the information in Table 6. For example:
  - How does leaving a layer of Peat when the field is abandoned impact soil moisture and temperature?
  - Has transplantation of special status plant species been successful?

Since Premier has been required to submit an annual report outlining a range of different information, including information about water quality and adaptive measures, there should have been considerably more information provided in this EAP.

- *Cumulative Impacts.* There was little to no information in the EAP about potential cumulative impacts. The review of other projects in the area, such as the [Manitoba-Minnesota Transmission Project](#), has resulted in recommendations for a regional, multi-sectoral environmental and cumulative impacts study in the area (see p. 9). More information about cumulative impacts should be required, particularly impacts to inter-

jurisdictional water resources. Any applicable regional assessment work should also be referenced in the EAP and used by the Technical Advisory Committee to inform the review of all proposed developments/alterations in the respective area.

We would also like to highlight the inconsistencies between *The Environment Act* licensing process and the requirements under *The Peatlands Stewardship Act* for peat harvesting licences. While the approval process for peat harvesting licences seems to require more detailed information about proposed peat harvesting activities, there is no opportunity for public engagement in this process. The EAP did not contain specific information about peat harvesting licence requirements, including whether or not Premier must apply for a new harvesting licence. There also does not appear to be public access to any peat harvesting licence information through either the Department of Environment and Climate or the Department of Natural Resources and Northern Development websites. More publicly available information is needed about the coordinated efforts of both departments in the assessment, approval, and enforcement of peat harvesting regulatory requirements. This includes more detailed information, along with other applicable permits and licences being available in the Department of Environment and Climate's online public registry.

#### Consultation Activities

Along with the missing information identified above, the EAP also lacked discussion of consultation activities with the public and local Indigenous governments/organizations undertaken by the Premier. Information included in the public registry indicates that there were concerns from Indigenous communities during past reviews of Poplar Creek Bog mining activities. More information should be required from Premier to indicate what, if any, consultation activities have taken place prior to the publication of the EAP. Premier should also be required to describe what the company is doing to work with Indigenous communities to ensure local benefits remain in the community. As currently written, the EAP indicates that meaningful consultation and consideration of potential impacts to Indigenous rights holders has not been undertaken by the proponent.

Given the project's location near the US/Canada and Ontario borders, there are international, and interprovincial implications that do not seem to have been addressed by Premier. More information is needed about the consultation activities that the Proponent and/or the Department have facilitated with potential impacted governments and regulatory agencies (e.g., International Joint Commission - International Rainy-Lake of the Woods Watershed Board). Since Canada is a signatory of the *UNECE Convention on Environmental Impact Assessment in a Transboundary Context* ([Espoo Convention](#)), there is also a need for more information about the Department/Government of Manitoba's activities undertaken to fulfill the consultation requirements associated with the Espoo Convention with respect to potential impacts of the project.

For the reasons above, the Eco-Network feels that Premier has not provided sufficient information to support the approval of their proposed project expansion. More public information and opportunity for independent review of such information, such as through a

public hearing, should be required before the proposed project is allowed to proceed through the assessment process.

The Department of Environment and Climate plays a very important role in protecting the environment in Manitoba. 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 is made.

Sincerely,

Patricia Fitzpatrick, Ph.D.  
Policy Committee Chair

Heather Fast, J.D., LL.M.  
Policy Advocacy Director

***About Manitoba Eco-Network:***

Since 1988, Manitoba Eco-Network has promoted positive environmental action by supporting people and groups in our community. Our programming focuses on policy advocacy, engagement in consultation processes and developing capacity building tools that benefit the environmental non-profit sector and our member groups. We are a public interest environmental organization seeking to promote and facilitate good environmental governance and the protection of Manitoba's environment for the benefit of current and future generations.