

July 24, 2012

Mr. Darrell Ouimet
Manitoba Conservation
Environmental Assessment & Licensing Branch
123 Main St Suite 160
Winnipeg, MB R3C 1A5

**Re: File Number 4254.10
Sunterra Horticulture (Canada) Inc. Peat Mine Development**

Dear Mr. Ouimet,

The Lake Winnipeg Foundation opposes the Sunterra Horticulture (Canada) Inc. Peat Mine Development proposal on the grounds that it will have significant negative environmental impact and is contrary to the Lake Winnipeg Foundation's position on wetland protection and the Save Lake Winnipeg Act. According to the mission of the Environmental Assessment and Licensing Branch - **The Environmental Assessment & Licensing Branch will ensure that developments are regulated in a manner that protects the environment and public health, and sustains a high quality of life for present and future Manitobans**- this development cannot be regulated in a way that protects the environment.

The Lake Winnipeg Foundation encourages the preservation of existing wetlands, the restoration of degraded wetlands, and the development of new wetlands centered on technological and institutional requirements for wetland management and governance. As Peat extraction is destructive of wetlands the LWF does not endorse peat operations being permitted *anywhere* in the Province.

A recent report by ICF Marbek for Environment Canada assesses the cost effectiveness of different strategies for **reducing nutrient discharges** to Lake Winnipeg (cost per tonne of phosphorus removed). This confirms previous Environment Canada conclusions (Wilson 2009) for water regulation, where wetlands and water filtration by forests provided the best cost-effectiveness, better than man-made management systems.

The province of Manitoba included a section in the Save Lake Winnipeg Act which places a 2 year moratorium on any new leases for peat mining in Manitoba. By simple virtue of the fact that this section is within the Save Lake Winnipeg Act, it validates the fact that peat mining is damaging to water quality. Although we cannot measure exactly how

much excess nutrients would be getting into the lake as a result of this particular peat mine, there would be more run-off from the area of land that has been cleared and stripped of peat. Any possible filtering effects from the peat would be lost and there would be more sediment running off during heavy rain events.

Premier Selinger recently announced that the provincial government had set a goal of a reduction of 50% of nutrients getting into Lake Winnipeg. The peat mine operation would not aid in meeting this goal but would add further burden of nutrients to the water.

Beyond the significant water quality concerns to an already severely stressed lake, this peat mine would contribute substantial amounts of carbon emissions to Manitoba's cumulative greenhouse gas emissions. The provincial government legislated a goal of reducing Manitoba's greenhouse gas emissions to 6% below our 1990 emission levels. However instead of moving towards that goal we have done the opposite. Overall, Manitoba's GHG emissions **increased 10% from 1990 to 2009**. Also, in 2009 our emissions were **16% above** the level we need to be at by 2012 to achieve our [Kyoto Protocol](#) target. Allowing new peat mines to operate would go against our legislated goal of reducing emissions.

In summary, the LWF considers peat extraction to be unnecessary and unsustainable and urges the Manitoba Government to support development and use of alternative processes and products, such as the conversion of dairy manure into horticultural products and bio-gas. Nutrient reduction to Lake Winnipeg would be a welcome co-benefit of this approach. We are opposed to the issuing of a permit to Sunterra Horticulture (Canada) Inc. to expand their peat mining operations.

Yours truly,
Karin Boyd
President
The Lake Winnipeg Foundation