

July 23, 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,

I am writing to express opposition to the Sunterra Horticulture (Canada) Inc. Peat Mine Development proposal on the grounds that it will have significant negative environmental impact. 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.

By including a section in the Save Lake Winnipeg Act which places a 2 year moratorium on any new leases for peat mining in Manitoba, the province of Manitoba has acknowledged the fact that peat mining is damaging to water quality. Any possible filtering effects from the peat would be lost and there would be more sediment running off during heavy rain events.

The peat mine operation would add further burden of nutrients to the water at a time when Premier Selinger announced that the provincial government had set a goal of a reduction of 50% of nutrients getting into Lake Winnipeg.

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.

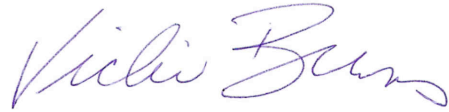


The satellite image above, from July 17 2012, shows a significant blue-green algae bloom in and around the narrows of Lake Winnipeg. Allowing further peat mining operations in this area can only exacerbate this problem.

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.

I am opposed to the issuing of a permit to Sunterra Horticulture (Canada) Inc. to expand their peat mining operations and instead encourage government to support research and development into alternative, sustainable products.

Yours truly,



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