



September 22, 2014

Ms. Tracey Braun, Director
Environmental Approvals
Manitoba Conservation
123 Main Street, Suite 160 (Box 80)
Winnipeg, MB R3C 1A5

Re: Request for alteration to Environment Act Licence No. 2518 R7

Dear Ms. Braun,

As a potato processing facility located in Portage la Prairie, Manitoba, Simplot Canada produces over 300 million pounds of deep fried potato products annually. As a byproduct of the manufacturing process, Simplot generates an average 15,000 pounds of raw potato waste per day. Since our opening, as specified in our Environment Act Licence, Simplot has disposed of collected raw waste as livestock feed.

For the past few years, Simplot has partnered with feedlots to collect raw potato waste for use as livestock feed. And in cases where contaminants such as plastic; metal shavings or other contaminants are found in the waste, the raw potato waste is deemed unfit for animal consumption and is diverted to the local landfill as per clause 56 of licence # 2518 R7. As part of Simplot's efforts to manage our waste streams more sustainably, we have evaluated composting as a viable solution to consolidating our organic waste streams. Composting will allow for the controlled biological, breakdown of this material and transformation of the waste into high quality and high value compost material.

Proposed Solution:

Simplot Canada has worked to identify composting as a sustainable end use for the raw potato waste generated. The company remains committed to sustainable waste management practices. To be effective in the long term, our raw potato waste management approach must allow for flexibility in end use, be acceptable to Manitoba Conservation and ultimately provide environmental protection. To this end, Simplot staff has identified composting as a value added sustainable outlet for our raw potato waste.

Alteration to Environmental Licence #2518 R7:

To improve Simplot's flexibility in raw potato waste disposal while maintaining compliance with our Environment Act Licence, Simplot proposes the following changes to the text of clause 56 of licence # 2518 R7:

Currently clause 56 is as follows:

Simplot Canada (II) Ltd.
Environmental Department
Box 1180 Portage la Prairie, MB R1N 3J9
Phone: 204-857-1475 Fax: 204-857-1499

56. The Licencee shall ensure that livestock feed material identified in Clause 53 of this licence:

- a) Is disposed of as livestock feed;
- b) Is not disposed of by application to land; and
- c) Is disposed at a waste disposal ground pursuant to Clause 52 of this Licence, is disposed in accordance with any requirements specified by an Environment Officer.

Proposed amendments to clause 56:

56. The Licencee shall ensure that livestock feed material identified in Clause 53 of this licence:

- a) Is disposed of as livestock feed;
- b) Is disposed of at a licensed composting facility for the purpose of composting;
- c) Is not disposed of by application to land; and
- d) Is disposed at a waste disposal ground pursuant to Clause 52 of this Licence, is disposed in accordance with any requirements specified by an Environment Officer

To ensure a sustainable outlet for our raw potato waste, Simplot Canada is requesting that Manitoba Conservation consider revising our Environment Act Licence to improve the flexibility for disposal options while maintaining environmental protection.

If you have any further questions or require more information I can be reached at 204-871-1056.

Sincerely,



Femi Ferreira
Environmental Manager

Cc. Tyler Kneeshaw, Regional Supervisor
Cc: Donna Smiley, Provincial Manager
Cc: Audrey Comte, Unit Director – Simplot Canada II