

October 10, 2006

Honourable Stan Struthers  
Minister of Conservation  
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Ms. Tracy Braun  
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Dear Minister Struthers and Ms. Braun;

**Re: Comments – Review of Environmental Impact Statement (EIS) for the OlyWest Hog Slaughtering / Processing Plant (Public Registry File # 5155.00)**

We are writing to provide comments on the environmental impact statement (EIS) for the OlyWest Hog Slaughtering / Processing Plant (which OlyWest has mislabeled as ‘Supporting Documentation’) (Public Registry File # 5155.00). Please place our comments in the public registry file for the proposed OlyWest project (PR File #5155.00).

We are providing a set of general comments that apply to OlyWest’s overall EIS as well as some comments that apply to specific sections of OlyWest’s EIS. These comments are organized into headings below. It is our expectation that supplementary filings by Oly West will result from the public review of their ‘documentation’ and that all supplementary information will be in the public registry, and filed on the Manitoba Conservation web site. This expectation applies to any identification of a lack, gap or deficiency in the information filed in our comments that follow.

***Overarching Comments – Proposed OlyWest Hog Slaughtering / Processing Plant***

***Process Issues***

We have several process concerns regarding the review of OlyWest’s proposed Hog Slaughtering / Processing Plant. To date, public information as to the activity of the federal-provincial technical

Manitoba Wildlands continues the work of WWF Canada and Nature Canada for new Manitoba Protected Areas.

advisory committee (the TAC) has been completely lacking, despite the fact that the usual practice for licensing under the Manitoba Environment Act has been to make this information available. In particular, public access to the comments from the TAC and from government branches and departments regarding OlyWest's EIS has not been filed in the public registry file and made publicly available on the Environmental Assessment and Licencing Branch webpage for OlyWest (<http://www.gov.mb.ca/conservation/envapprovals/registries/olywest/index.html>).

The absence of any references to the Manitoba Conservation draft advice document for OlyWest on the Environmental Assessment and Licencing Branch webpage for OlyWest; absence of information concerning the public review of that document and public comments provided on the webpage; and the requests for changes and response by the proponent on the webpage and in the public registry file are of serious concern. We are formally requesting that all information regarding the draft advice document be filed in the public registry file and that all information in the public registry file be posted on the Environmental Assessment and Licencing Branch webpage for OlyWest.

We also note that public information regarding the schedule for the OlyWest review and hearings – the overall sequence of steps, deadlines etc has not been made available at any time this year.

Much of the content references and provides information regarding the 3 mile radius for the project areas. This project area is clearly too small. What is absent is a clear discussion about the potential impacts on people within that radius. While it is fine to list all the churches, schools, traffic and homes in that radius a cohesion discussion about risk and impacts in that radius or project area is missing. We suggest that this is a serious deficiency.

Finally, despite public 'open houses', meetings with stakeholders, concerned citizens, environmental organizations to address specific concerns and be available to answer questions have not occurred. Oly West needs to understand that these kinds of steps are usual in our province, and actually aid the public processes under our Environment Act.

### ***EIS Format***

The ('Advice Document') was intended to guide OlyWest's submission of its environmental impact statement (EIS). The Advice document provided by Manitoba Conservation contained a variety of requirements that OlyWest's EIS was expected to fulfill. However, **OlyWest has not provided a response to each element in the advice document** in a way where this information is clear, transparent and easily accessible when reviewing the EIS. In the interest of presenting information in such a way as to readily evaluate how and whether Manitoba Conservation's requirements were being met, OlyWest should have cross referenced the Advice Document in those sections of the EA where a particular Manitoba Conservation requirement was being addressed. We suggest that one effective way to accomplish this would be to use notations that correspond to the numbered sequence for each element in the Manitoba Conservation Advice Document. NO such notation is evident in OlyWest's EIS.

To illustrate our point, there are several instances in the EIS where it is unclear why certain information is being provided. We have been unable to figure out why information about Brokenhead First Nation is provided in Section 2.11.5, when Roseau River First Nation is actually the First Nation in closer proximity. Proximity aside, it is not clear what the relevance of the information presented here to OlyWest's project. There are also several pages where there seems to be no apparent reason for including the information. It is these instances in particular where the information in OlyWest's EIS should include a clear indication of its relationship to information Manitoba Conservation has requested in the Advice Document. Further, the relationship and relevance to the proposed project and its environmental impacts etc. should also be explained following the explanation of the connection to the Advice document.

**All licences, permits and contracts / agreements required for the construction and operation of OlyWest's project should be listed** together with clear information as to their status as of fall 2006. There is no such listing in the EIS. Further, where permits and agreements are referenced, the organization of the project description and environmental assessment (EA) information fails to clearly identify what is a City of Winnipeg agreement or permit, and what is a province of Manitoba agreement or permit. It should be noted that Oly West has apparently decided to ignore federal standards which Manitoba is party to – this pattern also points to the complete lack of a public policy framework for information provide in the 'documentation'. We would point out that Manitoba Conservation failed to provide clear information about the public policy framework relevant to this proposal.

### *Accessibility of EIS Information*

**We are concerned about the failure of the proponents to cross-reference and make accessible** from within the text – both Volume 1 and 2 – all repeating elements of the assessment. This deficiency is a barrier to full technical review and obscures information. For example, impacts regarding greenhouse gas emissions are discussed in at least four different places in the EIS, yet there is little in the way of cross-referencing to indicate the other sections where additional /complementary information can be found. This is unfortunate and needs to be corrected in a supplemental filing. Simply indicating climate change information as part of the Table of Contents is NOT sufficient in this regard.

We also note that not all pages in the EIS are numbered; there are surveys from the open houses which don't include any page numbers on them. Every effort needs to be made to provide EIS information so that it can be referenced later as part of the review and hearings process. Also with regard to surveys, samples of surveys used in 'consultation' and all materials on display and handed out at open houses are not included in the EIS. These should be provided, and should have been part of the public registry since June, 2006.

**OlyWest's Socio-Economic Study is identified as being proprietary.** Yet certain results from this study are included in the EA and the reviewer is expected to accept this information without question. Either this information should be omitted, or it should be verified by access to the full report (especially OlyWest's claim of creating 5200 jobs). There is no precedent for this in licensing under Manitoba's Environment Act, and there are many precedents for details studies regarding employment, economic impacts and social impacts being provided as part of the public review and government / TAC review of projects. These materials in Appendix E must be made available.

**Finally, the text of OlyWest's EIS is inconsistent with regard to the use of acronyms.** All and any text that is submitted for public review should be clear and consistent in this regard and should be presented in a style that is understandable to a layperson. Acronyms should be spelled out in full at least once on every page where they appear. The Glossary and list of Acronyms provided mean that those preparing the 'documentation' for Oly West could easily have made sure that text followed usual standards for use of acronyms.

### ***Public Policy Framework – Absent***

OlyWest essentially does not provide any information as to how its proposed project fits into the City of Winnipeg or the Province of Manitoba's public policy framework. At a minimum, the proponents should explain how this project fits into the City of Winnipeg's land use plans and waste management plans, and Plan Winnipeg, - and how it supports the Province of Manitoba's public policy objectives concerning, for example water and climate change. We would suggest that a review and comment on the relevance of this proposal/ project to Manitoba's lands use policies should also have been included. OlyWest's EIS does not even name city and provincial policies that apply to its proposed project. This is clearly a significant failure.

We note that the response by Oly West to a requirement to comments on fulfillment of Manitoba's Sustainable Development Principles and Guidelines is merely token. We would challenge the company and its consultants to review the detailed and thorough response of other proponents seeking environmental licences in Manitoba. In preparation for the next stage of review this section is an example of a deficiency which Manitoba Conservation needs to request an updated version for.

### ***Disclosure & Assumptions***

**Disclosure as to the ownership of the three partners in OlyWest is necessary,** especially given the level of subsidy from the City of Winnipeg and the Government of Manitoba. We note that the Saskatchewan partner is 80% owned by the Saskatchewan government. Since public tax dollars from Manitoba are being provided to a majority Saskatchewan government owned operation, full disclosure as to ownership must be part of the due diligence of this consortium.

The proponent has repeatedly avoided indicating the level of operation (animals per week) to which the figures in their Tables through out the EIS refer. This means that none of this information can be connected to level of operation.

The stated assumptions regarding the City of Winnipeg waste water treatment agreement are not substantiated or referenced.

See our comments below regarding materials labeled as Proprietary.

### ***Traffic & Road Infrastructure***

**All traffic assumptions are based on the repeated statement that all staff will arrive 45 minutes** before their shift starts. There are no qualifying statements included to indicate that this time is part of the shift and wages paid will include this lead time. If this requirement amounts to 45 minutes of unpaid time, there is no basis to impose such a requirement. This leads us to wonder whether there are Labour Law issues that are of concern regarding OlyWest's labour practices. This should be clarified in the proponent's supplementary filing.

The distinction between kinds of traffic and kinds of trucks is wholly insufficient.

Traffic data provided by the proponent suggests that there will be only a 1% increase in traffic resulting from the operation of OlyWest's Hog Slaughtering / Processing facility. However, this data is from a study conducted by OlyWest's consultants. No additional data, projections, comparisons of traffic patterns from plants of similar capacity, etc. are included to balance, support data provided by its own consultants. Nor is there sufficient discussion of other causes for increases in traffic levels over time. And depending on which section of the documentation you are reviewing figures as to increase in traffic may be as high as 6 or 7 %.

**The EIS does not include a discussion about other costs to the City of Winnipeg and Province of Manitoba** in terms of impacts of increased traffic on the need for road maintenance and construction costs. Certainly the change in type or traffic also needs to be considered. Overall there is no accurate and complete detailing of the costs to Manitoba and Winnipeg for this project. We do see substantial documentation of the economic benefits or revenues to Winnipeg and Manitoba. The EIS should contain information that starts with all cost to both levels of government, and projected future costs.

There appears to be a tendency in the OlyWest EIS to state that no significant impacts will occur as a result of various aspects of construction or operation. We find it odd that that nowhere in the EIS are there references to moderate or minor impacts.



### ***Benefits vs. Costs***

OlyWest's EIS assumes that the community, the city and province will only benefit from its proposed project. However, the EIS is largely silent and does not describe the ongoing and/or one-time costs of its project to the surrounding community and levels of government.

There is a pattern that emerges with respect to the data and statistics (and references) used throughout the EIS where much of the **information is 5 or 6 years out of date**. We recommend that the TAC, the CEC and Manitoba Conservation request more up to date comparisons and sources for the assumptions in the Oly West 'documentation'.

The discussion regarding the sufficiency of the labour force available for OlyWest – skilled and otherwise – needed to build the plant is lacking in clarity. A discussion about competition between other major construction projects that will or may be taking place during the same time period is completely absent. **OlyWest needs to provide its contingency plan for delays in construction** should there be a shortage of skilled workers. Also OlyWest needs to become much clearer about its tendering processes, and its difficult to understand comments about whether there will be *any* Manitoba preference in contracting services and goods.

### ***Information Gaps***

Information regarding **solid waste management and disposal** is largely missing from various sections of OlyWest's EIS. Information regarding the amount, composition and frequency of transport of solid wastes to all landfill facilities should be clearly explained in the EIS. Any animals, materials or waste going into the facility needs to be clearly explained as to management and waste disposal. Details as to how much waste will be going into landfills and where those landfills are located is needed, especially as the public needs to understand how much waste that is when operations are 45,000 animals per week. The proportion of animal wastes in landfills, which may not have been designed for this kind of waste should also be explored.

OlyWest completely **fails to reference government regulations, standards and policies** regarding chemicals in its EIS despite including many pages of industry standards and directions regarding the many chemicals on site in Volume II. The usual standards for licensing under Manitoba Environment Act are omitted and the proponent has NOT included any government standards, policies or directives regarding these chemicals. We would like the proponent to explain why. We would also like Manitoba Conservation to make sure this is corrected immediately.

The section on **Endocrine Disrupters** (6-16 to 6-19) is lacking – and data used to support the proponent's assertions regarding impacts is out of date. The proponent should be required to present technical information regarding human impacts from endocrine disrupters. In particular, the Alberta government report and others appear to be selective. In its discussion of endocrine disruptors as they relate to Manitoba Water Quality Standards, Objectives and Guidelines (MWQSOG), the proponents

fail to acknowledge the fact that the MWQSOG are under review and that the previous standards will change. This is another example of the proponent's failure to acknowledge the current status and implications of Manitoba's public policy framework.

We suggest that much of the **content regarding particulate matter is unclear** – and does not explain clearly what particulate matter is expected to be discharged by the plant's system, when, and its potential effects. Health risks, especially to children, and those with chronic health conditions should be discussed. Separating the particulate matter in emissions information from the content regarding all the chemicals stored, and used at the plant could be taken as an unfortunate approach in public review materials. The link between the two needs to be explored, and the information must be organized in such a fashion so that it can be used in the hearings.

**Re: Table 2.9**

This table provides information about the average weekday daily traffic, without indicating that information about increases in traffic levels, types of traffic or increases in truck traffic due to OlyWest can be found elsewhere in the EIS. This is another instance of the need for cross-referencing, which we have noted above.

**Re: Section 4.4 Future Expansion**

Page 4-13 of Section 4 states,

*The proposed OlyWest facility is expected to start processing hogs in 2009 running at a capacity of 18,000 hogs per week (3,600 hogs/day). The capacity is scheduled to increase over the next three to five years, until reaching a maximum of 45,000 hogs per week (9,000 hogs/day). The proposed facility building and property has been designed to accommodate the physical space requirements necessary for future expansion if deemed necessary and pending additional environmental reviews and approvals. This report is based on the full capacity of the plant (9,000 hogs/day), including the input and output mass balance in Section 5.3.5.*

The information provided above for the assumed staged expansion and licensing described is insufficient. All impacts should be assessed for the operation of the facility at 18,000 hogs a week AND then at 45,000 hogs a week. We have noted above that many of the charts, and much of the text in this set of documents is not clear as to whether the content applies to 18,000 or 45,000 hogs per week.

This should include a detailed analysis for all aspects of operation and impacts including noise, odour, impact on roads, traffic, waste (solid and waste water) for operating at 18,000 hogs a week and then at 5,000 hogs a week increments up to 45,000 hogs/week.

If the plant is only operating 5 days a week initially, then detailed information as to which days, which holidays, and how the shut down and start up of operations after 2 or 3 day breaks will be handled must be part of documentation provided by the proponent.

**Re: Section 5.1.2.1 Water Metering Devices**

Page 5-2 states,

*There will be several water metering devices throughout the proposed facility. The main entrance of potable water from the City will have a volumetric flow meter. This meter will monitor the ongoing and cumulative flow rates to the facility. In addition to these metering devices, there will also be similar types of flow metering devices in several other locations including the holding facility, the kill area, the cut area, the blood and protein recycling area, and the exit of the pressure sanitation pumps to allow OlyWest to manage their systems.*

What is glaringly absent from the information provided in this section is any information as to procedures and standards for the monitoring of water use or what OlyWest will be paying for its water usage.

**Re: Section 5.1.4 Chemicals and Table 5.2**

This section raises questions as to the disposal of chemicals listed in Table 5.2. (e.g. in our waste water systems, in the air, or to land fill etc). More information in this section or in Section 6.0 is needed to clearly explain the treatment and disposal process as it applies to each of the chemicals indicated in this chart.

Specific to Table 5.2, information as to the purpose and need for such quantities of Anhydrous Ammonia Fertilizer is not provided, nor are the uses (aside from rates of usage) explained for any of the chemicals listed. What is being fertilized?

We were also very surprised that information regarding the federal and provincial regulations regarding these chemicals is absent.

**Re: Section 5.1.5 Traffic**

Page 5-6 states,

*As with any new development, traffic is expected to increase with the operation of the proposed OlyWest facility. Roads surrounding the area, Dugald Road and Plessis Road, are expected to experience the greatest influx of traffic, with Dugald Road having a larger increase from commuter traffic and Plessis Road having a larger increase from truck traffic.*



*The annual average daily traffic (AADT) has been analyzed for when the proposed facility is operating at full production capacity in 2011 and is shown in Table 5.3. It is expected that over a 24 hr period, 2-way truck traffic as a percentage of total traffic may increase by 1%, from 8 to 9%, on Plessis Road, and have no noticeable change on Dugald Road.*

The traffic analysis provided by OlyWest is insufficient. Further, OlyWest attempts to emphasize the most innocuous of the statistics, while ignoring the more significant implications of the data presented.

For instance, the analysis fails to account for traffic increases resulting from indirect suppliers and services associated with servicing its staff.

OlyWest skews its traffic study results in the text by emphasizing the increase in truck traffic as a percentage of total traffic, which is ‘only’ an increase of 1%. It does not discuss the implications of the overall increase in traffic as a result of the proposed project (both trucks and staff traffic), which a more significant figure of 6.1% or 5.7%, depending on the road under consideration.

We also wish to again suggest that the City of Winnipeg would be able to provide additional independent traffic projections and review OlyWest’s projections.

It is also not clear whether OlyWest’s definition of truck traffic associated with the project includes traffic increases not only due to staff and suppliers, but also trucks arriving with hogs, trucks leaving, trucks leaving with product. This lack of clarity is a significant weakness and the proponents should address this lack of clarity in their supplemental filing.

Overall, Table 5.3 is wholly unbelievable and the information provided to support the statistics gathered in the traffic study is insufficient.

This section on traffic does not provide any information or discussion regarding increased costs for road maintenance as a result of the project and fails to discuss the climate change implications of the traffic (greenhouse gas emissions), which is an issue that is separate from the emissions from the operation of the plant itself.

**A credible and thorough climate change assessment** would include an assessment of emissions during construction, emissions during operation, emissions from upkeep and maintenance, emissions from trucks coming and going from the plant, emissions from hogs and manure. The assessment would compare the current situation to the various stages projected over the life of the plant.

A similar sort of thorough assessment is needed in terms of traffic flow.

We note that today all environmental assessments and requirements for proponents must include clear climate change information. Ideally a carbon budget for all aspects of the project should be included.

Ideally a corporate citizen such as Oly West would be interested in determining how to neutralize as much of its emissions as possible.

**Re: Table 5.7 & Table 5.8**

Table 5.7 and the Section on greenhouse gas (GHG) emissions fails to describe the GHGs that will result from the construction of the plant. Therefore the assessment of the project in terms of climate change impacts is incomplete.

**Table 5.8: Anticipated Wastewater Effluent Characteristics from the Proposed OlyWest Pork Processing Facility** lists quantities based on operation of the facility 7 days per week, when OlyWest's documentation boasts a 5 day per week operation. Therefore this table should provide information for a 5 day work week of average operations in order to be more relevant to the assessment and information regarding weekend operations should be separate. Clarity on operations over weekends is needed.

**Re: Section 5.3.2.4 Surface Runoff**

Page 5-19 states, that "A detailed design of the surface drainage plan has not been completed as of yet". This surface drainage plan includes a retention pond for surface runoff. **The surface drainage plan must be filed as supplementary** information by the proponent, and public participants will require sufficient time to review supplemental information prior to the commencement of the hearings.

**Re: Section 5.3.2.5 Sludge and Solid Wastes**

Page 5-19 states,

*As the proposed OlyWest pork processing facility will utilize an on-line continuous protein recycling system, all pork by-products that cannot be sold will be processed on-site. There are no animal by-products that cannot be sent to the protein recycling facility for processing.*

*Sludge generated from the on-site wastewater pre-treatment will be sent on a continuous basis to the protein recycling facility for processing. It is estimated that approximately 90 m<sup>3</sup> per day of wastewater pre-treatment sludge will be generated with an approximate solids content of 6%. Dead on arrival hogs and hogs that arrive sick at the facility and the veterinarian deems unfit for processing will also be sent on a regular basis to the protein recycling facility for processing. It is estimated that 2-3 hogs will be considered too sick to be sent for processing per day and that there will be approximately 8-15 DOA hogs per day see references to 'per day'*

The documentation is full of references to per day output or activity where there is no qualifier as to level of operation the plant would be at for such a 'per day' reference. We assume this is about full capacity and 45,000 hogs / week. It is noteworthy how little content in the documentation actually discusses manufacture of animal products.

**Re: Section 5.3.3.1 Fire**

Page 5-21 states,

*In the event of a fire at the proposed facility, it is expected that similar pollutants released in any fire will be present. Bulk masses of all chemicals are not anticipated to be affected by a fire as the chemical storage rooms will be designed following Manitoba Fire Codes, and chemicals stored outside of this room all have a concrete secondary containment, so pollutants should not be released from these chemicals.*

**The above is wholly insufficient information, particularly given the 4-page list of chemicals** indicated in a previous section of the EIS, and that few details are provided as to how those chemicals will be stored, etc. The proponents should be required to file a comprehensive fire/emergency plan for review as part of the assessment process.

***Ventilation System***

*The holding facility ventilation is achieved through roof mounted intakes with louvered controls, heat exchangers and numerous exhaust fans with check valves mounted within the exhaust chimneys. The exhaust chimneys are located over the entire holding pen area. While holding pens at other facilities have wall mounted exhaust ports, the roof mounted system aids in dispersing any odour generated in the pens. The louvers are controlled by multi-zone thermostats within the holding area (with a target temperature of approximately 18 to 23 oC (65 to 75 oF)) and a room air change rate of 6 exchanges per hour in the winter and 60 exchanges per hour in the summer. The temperature controlled louvers, the heat exchangers and the check valves all assist in increasing the energy efficiency of the facility.*

An explanation is needed as to why there are 6 exchanges per hour in winter and 60 in summer. What about spring and fall, what is the rationale or definition for these two rates. There needs to be an explanation as to humid or wet weather and how the ventilation system in the holding facility will be operated under these circumstances.

***Re: Table 5.9: Water Requirements and Wastewater Production***

This chart does not indicate what level of operation of the plant (18,000 or 45,000 hogs a week) the water use information relates to

***Re: Table 6.2: Greenhouse Gas Emissions***

Please see our previous comments regarding the failure of the proponent to account for the increase in GHGs that will result from all aspects of construction and operation of the plant. The emissions assessment should reflect GHG emissions from trucks, staff traveling, animal gas and methane etc. in addition to GHG produced as a result of plant operation.

To illustrate our point, page 6-8 states,

*Sound from the proposed OlyWest pork processing facility will be a result of the reefer units on truck and transportation vehicles, the movement of the vehicles themselves and from mechanical equipment such as the evaporative condensers, holding facility exhaust and the protein recycling facility exhaust. The plant has been orientated such that the hog shipping trucks will access the site and idle on the south east side of the proposed building near CN Railway's Symington Yard's to provide noise mitigation by increased residential separation.*

The proponent clearly acknowledges that trucks will spend time not only in transit, but idling as a result of the proposed project. **The GHG emissions resulting from idling** activity need to be quantified and an assessed as part of this environmental review process. More information from the proponents regarding this issue must be forthcoming in a supplemental filing. Also there is an opportunity for the proponent to state now what its policy regarding idling vehicles will be, in relating to the GHG emissions that could be reduced.

#### ***Re: Section 6.3.3.2 Effluent Impacts to Surface Water***

*Effluent is only produced during the operational phase of the proposed project. Integral to the proposed OlyWest facility operational design has been the ability of the City of Winnipeg to accept and adequately treat the effluent from the operation. Agreement between the City of Winnipeg and OlyWest has been reached such that the all effluent from the proposed OlyWest operation will be directed towards the City of Winnipeg NEWPCC. In total, the effluent from the proposed facility will represent 1.6% of the current treatment volume at the NEWPCC, making potential for impacts in the medium category.*

There is no date, no point in time re effluent impacts, no projections provided. Also again no indication of whether the 1.6% pertains to 18,000 hogs or 45,000 hogs

We recommend that the details of the effluent agreement between Oly West and City of Winnipeg should be made available, should have been part of the 'documentation'.

*Most of the ammonia and nitrogen load from the proposed OlyWest processing facility would pass through the mainstream NEWPCC and into the Red River, with little reduction occurring in the mainstream portion of NEWPCC. To compensate for the additional nutrient loading imposed on the river by the proposed OlyWest processing facility, the City is prepared to increase the removal of nitrogen from the centrate to offset the increase in nitrogen loading to the river due to the proposed OlyWest facility.*

Verification of what the City of Winnipeg will do must be supplied. TAC comments on this issue will need to be public. Has Manitoba agreed to allow the daily nutrient load to increase as described by the proponent?

Is OlyWest paying for, being charged for the extra construction and treatment, maintenance costs regarding additional nutrient loading? What are OlyWest sewage charges from City of Winnipeg? We would suggest that the total figure for sewer and water charges from City of Winnipeg provided are not sufficient information.

**Re: Table 6.5: Wastewater Quantity Phosphorous Loads**

This table again does not indicated operation/ hogs load for the figures - 18,000 or 45,0000 a week ?

**Re: Section 6.4.3 Proximity to Other Businesses**

*A distance of approximately 440 m (1,444 ft) exists between the animal holding area for the proposed facility and nearest commercial structure in the St. Boniface Industrial Park. A listing of businesses in the St. Boniface industrial park can be found in Section 12.2.4 and maps illustrating proximity to other infrastructure and zoning areas can be found in Figures 1.1 and 2.1 of this report.*

Text above fails to discuss impacts on other businesses from traffic, odour, noise, infrastructure failure, spills, etc etc (including combined projected increase in waste water treatment needs).

**Re: Section 6.5.1.1 Groundwater**

Page 6-21 states,

*No use of groundwater during the construction or operation of the plant is anticipated. Existing uses of groundwater in the area will not be impacted.*

These statements completely miss the point concerning groundwater. What is missing is an **assessment of the risks OlyWest's project poses to groundwater**, what potential exists for groundwater contamination (from spills, etc.) and what OlyWest intends to do in order to eliminate any potential risks. This is a very important aspect of the proposal, as contaminated groundwater is not a simple matter to address and remediate. Additional information from the proponent is required.

**Re: Section 6.6.2 Operational Phase**

*Employee and general delivery truck traffic to the facility will enter the industrial park from both Dugald Road and Plessis Road. While both Dugald Road and Plessis Road are designated as full time truck routes (City of Winnipeg Traffic By-law 1573/77, 1999), hog delivery vehicles will avoid travel through populated areas by traveling to the proposed facility northbound on Plessis Road and turning left either onto Camiel Sys Street and left again onto a proposed extension of Ray Marius, or left onto a proposed private road off the Manitoba*



What methods will Oly West employ to make sure that hog delivery trucks do not go into Winnipeg after they have delivered their loads ?

**Re: Table 6.11: Number of Intersection Accident Reports**

This table is based on flawed analysis as if accidents only occur at intersections. What about vehicle accidents on the site or involving vehicles that have been at the plant, and have accidents within the project area?

**Re: Section 6.7.2 Air Emissions**

*The principle potential environmental impacts from the air emissions are the possible effects on human health. The air emissions that primarily have health implications are PM2.5, PM10, NOX, CO, SO2, odour, and noise and have been assessed in the Environmental Health Impacts Category. The following assessment considers those possible effects by comparing the computer predicted ambient air quality during operation of the plant to the Manitoba Air Quality Guidelines or other criteria where appropriate.*

Oly West needs to tell us what ‘ other criteria where appropriate’ means. . Does this means that Oly West investigated and applied CEPA or CEAA or CCME standards? A discussion of human health risks should be part of this section.

**Re: Section 6.8.1 Land and Property Effects**

This section mentions Winnipeg’s aqueduct. We suggest that Oly West should be required to post a **bond to guarantee that ‘care will be taken not to damage the City of Winnipeg aqueduct.’** Should such damage occur Oly West should be required to cover all damages, costs, etc.

A detailed discussion of impact and risk to ground water is lacking in the EA. As noted before a full list of all approvals, agreements, contracts, permits and licences which cover activities that may impact ground water should be included in the documentation.

**Re: Table 6.15: Value of Annual Purchases of Materials and Services**

*The \$645 million estimated value of OlyWest’s proposed production implies an annual increase in Manitoba’s GDP of roughly \$270 million, an increase in Manitoba household income of almost \$160 million, and roughly 5,200 additional person-years of employment in Manitoba. These estimates pertain to hog processing only, it is assumed that in the absence of the proposed OlyWest facility, the 2.25 million hogs will be produced and sold to other non- Manitoba processing facilities. It is anticipated that the current Manitoba live market hog exports will offset the need for expansion of the hog industry within Manitoba. These GDP, income and employment values are positive and continuing.*

*According to OlyWest, no formal preference will be given to local firms and suppliers during bidding processes. All other things being equal, however, local firms normally will be selected over non-local firms for material supply and maintenance contracts.*

Given that **the Socio Economic Report was not provided** and there are two options: Accept what OlyWest has provided as information based on access to the Socio Economic Report *OR* delete this information. Details as to how the aggregate numbers were arrived at are missing. The plant is between 400 and 1000 jobs depending on level of operation. So an explanation is required. The usual standard for these kinds of details in a Manitoba Environment Act proposal is to include indirect jobs, direct jobs, and identification of types of jobs, so details must be filed. Or they will be considered to be absent.

***Re: Section 6.8.10 Effects Resulting from the Housing of Employees***

The comparison to a Brandon plant and housing issues there is 6 year old information. To be relevant it should be updated and related to Winnipeg.

***Re: Section 6.8.12 Effects on Provincial, Municipal and School Division Budgets***

**Province of Manitoba**

*The Province of Manitoba is considering a loan (with security) to OlyWest. The principles of an agreement have been discussed, but an agreement has not been finalized. This assistance would be delivered through the longstanding Manitoba Industrial Opportunities Program (MIOP) operated by Manitoba Industry, Economic Development and Mines. MIOP is designed to “secure significant business investments which would not occur in Manitoba without provision of some level of government assistance.” The business investment must be commercially viable, and it must deliver fixed asset investment and long- term job creation .The interest rates charged depend on current market rates and security offered by the borrower among other factors.*

**Details of this loan should be made public immediately.** The information is another example of a deficiency to be corrected in supplemental filings from Oly West.

**City of Winnipeg**

*The City of Winnipeg Council approved construction-stage related financial benefits to bring the proposed OlyWest facility to Winnipeg. These negative, one-time and short-term amounts are not significant in light of a 2006 operating budget of \$721 million in expenditures. Through its Local Improvement District program, a program in place for many years, the City will finance public infrastructure necessary to a development. City financing is amortized over 20 years at the interest rate the City pays for borrowing on capital markets plus 1% for administrative costs. This amount will be approximately cash flow neutral to the City. Post-construction financial impacts on the City of Winnipeg are discussed in the next section.*

*School Divisions*

*The educational property tax will not be payable until construction is complete. As noted above, construction employees will either have been residing within a reasonable commuting distance from the site and those residing beyond a reasonable commuting distance from the site will not likely relocate their family for the short construction period.*

**OlyWest needs to supply a chart showing all subsidy, loan and gifts from governments, including valuation of land where the plant will be located.**

***Re: Section 6.9 SUMMARY OF IMPACTS***

Oly West and Earth Tech need to provide information as to its criteria for insignificant, moderate and significant impacts. Not provided anywhere

***Re: Tables 6.17 and 6.18***

These will not rotate inside the pdf and are therefore not accessible or able to be easily viewed on screen. Must be corrected as this is the full listing of environmental impacts – and participants will be aiming to comment.

***Re: Section 12. Public Consultation***

Pgs 188 + includes a listing of media coverage of the Oly West project and is used as a proof of full public information and debate and therefore consultation There is no known precedent under Manitoba's Environment Act for a proponent using media coverage as a proof of their good will and public access to information. .

Section 12.2 details public consultation steps. Manitoba Wildlands and other environmental organizations in Manitoba or Winnipeg were never contacted by the proponent. It is usual practice in Manitoba for environmental organizations and the scientific community to be provided with information, and an opportunity to ask questions of the proponents in advance of the public review.

***Re: Volume 2***

***Emissions Report***

Charts do not indicate what level of operation these data apply to. Emissions data does not appear to be separated out between slaughtering operation and manufacturing.

***Re: Appendix B Odour Remediation Methodology***

This information is also identified as proprietary. This information will need to be made public or else all claims and assumptions regarding odour will need to be dropped from this review. It is not

appropriate to suggest that the public should accept the assurance of the proponent on faith without the opportunity to have such claims independently evaluated. (scan 597)

***Appendix K***


Is also Proprietary (scan 661) and same comments apply.

***Appendix M***

This is NOT a health and safety policy for this proposed plant, but lots of scans of material from other plants. **Oly West will need to provide its health and safety policy.**

Manitoba Wildlands appreciates the opportunity to participate in this environmental review process and we trust that our comments will be considered carefully. We assume that our comments / this letter will be posted to the file in the public registry for this project.

Yours truly,



Gaile Whelan Enns  
Director, Manitoba Wildlands