

P5

<p>2-5 And Appendix B of Appendix H</p>	<p>"Table 2.2 shows that the most frequent wind direction in from the south" Appendix B Odour Determination Methodology - PROPRIETARY</p> <p>Comments – Email from Environment Canada</p> <p>"Thank you for sending your request to Environment Canada. Here's the explanation about prevailing winds in Winnipeg. There is the possibility that winds in a localized area are different than what is observed at the Winnipeg International Airport due to the position of buildings, trees, etc. However for calculating climate normals, one measures the winds in an open area such as the Winnipeg Airport away from the influence of any buildings or vegetation.</p> <p>Winds at the Winnipeg Airport are measured to 36 points of the compass. To calculate prevailing wind direction (the most frequent direction that the wind blows from), one uses long term weather records, ideally for a 30 year period.</p> <p>For the purposes of the Climate Normals Web site http://climate.weatheroffice.ec.gc.ca/climate_normals/index_e.html the data from these 36 points are combined to 8 main wind directions: South, Southwest, West, Northwest, North, Northeast, East and Southeast. Of these, the most frequent direction over the 30 year period from 1971-2000 is indicated on the Climate Normals Web site by month and for the year.</p> <p>In looking at these data for Winnipeg International Airport, in all months of the year, winds from the South are the most frequent compared to the other directions. However this does not mean that these are the only winds that Winnipeg receives. In all months, winds are also recorded from other directions. North westerly winds are the second most common winds followed closely by North winds and West winds. This probably leads to the perception that winds from the Northwest are the most common.</p> <p>Here are 1971-2000 normals for the entire year for Winnipeg Airport. This indicates the percentages from each of the 8 directions and calm winds. For each month of the year the percentages are quite similar.</p> <p>South 22.7% Southwest 7.2% West 14.0% Northwest 15.8% North 14.6% Northeast 8.1% East 5.5% Southeast 8.6% Calm 3.6%</p> <p>(Total does not equal 100.0% due to rounding)</p> <p>So the most frequent direction is from the south, 22.7% of the time, but winds from the west and northwest (when combined) happen 29.8% of the time.</p> <p>I hope this explanation helps.</p> <p>Yours truly,</p> <p>Bernard Duguay Meteorological Inquiry Specialist</p>
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MSC National Inquiry Response Team
Environment Canada"

Questions – Were other wind directions taken into consideration when modeling odor? How can the community depend on a report that omits methodology? (methodology for distance used to the centre of the property not the perimeter) Why are industry standard (non-proprietary) methodologies not being used?

Please refer to Response T54 and C17.2.

P6

Winnipeg is drained by the Red River and its tributary streams, supplemented by construction of road ditches and artificial channels and culverts that discharge into natural streams (Michalyna et al., 1975).

The Red River originates in Lake Traverse on the Minnesota-South Dakota border, as the Bois de Sioux River joins the Otter Tail River and flows north. It receives its major tributary, the Assiniboine River, at the Forks in Winnipeg and eventually flows into Lake Winnipeg. (Marsh, 2006).

Questions – Have the numerous experts on Lake Winnipeg and Aboriginal rights (fishing) been provided with this report? Has the Ministry of Environment - Oceans and Marine Fisheries Division been provided with this report and asked for comment? Have they had an appropriate time to reply?

The OlyWest environmental assessment report is a public document and is available for all to review. The Federal Government (including the Department of Fisheries and Oceans) has reviewed the report and it was determined that the project did not trigger a federal review under the Canadian Environmental Assessment Act (CEAA).

P7

2-8	"Review of topographic maps and the topographic survey indicates that overall surface drainage at the proposed site would tend to migrate west towards the Seine River, the only significant natural drainage channel in the vicinity of the project area. The Seine River is located approximately 4 km (2.5 mi) southwest of the site, flowing in a northerly direction to its convergence with the Red River. (Figure 2.10)"
2-11	"According to the well records, of the 173 registered wells"

Questions- How many wells are at risk if there was a spill? What would happen to the aqueduct if a spill were to occur?

Please refer to Responses C4.1 and C8.1.

P8

2-13 to 1-17	Five to six year old information is frequently used.
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Questions – Why is current information not used when it is available – for example according to the Canadian Government our current unemployment is 4.5% not 5.7% (Labour Force Survey Highlights For March 2006 Seasonally Adjusted)

http://www1.servicecanada.gc.ca/asp/gateway.asp?hr=en/mb/lmiquarter1_06/wpg03.shtml&hs=mb0#manufacturing

How many of the employees would currently live in Winnipeg or Broken Head? How will people from Broken Head get to work? Why are people able to travel such a long distance from their community when it is insinuated that Winnipeggers' will not travel 5 kilometers?

Information on demographics was obtained from Statistics Canada. The most recent census data available was from 2001. Reports used by Earth Tech were credible.

Employees are expected to reside in the Winnipeg CMA. Statistics for the Brokenhead First Nation Community were included as the advice document prepared by Manitoba Conservation requested information on demographic features be presented and Brokenhead First Nation Community is the closest First Nation Community to the proposed site.

P9

2-13	"Derived from Confidential Social Economic Impact Report."
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Questions – What year? Who created the report? Why can we not see the report? How can we trust the information? Methodology? Etc?

This report was considered proprietary as it contained information regarding incentive packages offered to OlyWest. The report was prepared by Neil Loughran, Ph.D in August 2006 and is now being made available for this project.

P10

"Table 2.9 indicates the Average Weekday Daily Traffic (AWDT) (two way) on the streets in the vicinity of the proposed OlyWest site according to the City of Winnipeg Public Works Department Transportation Division (2005)."

Comment – Please see Appendix C

Questions – Why are these numbers provided with no analysis? What would we normally expect in Winnipeg? Are these roads already to busy for extra traffic as two-lane or four-lane roads? If the roads require expansion – what would be the cost? Will increased congestion impact current or future business? What increase in time/pollution could be expected? Why were roads like Bournais road not included? Analysis Please.

Table 2.9 indicates the existing traffic counts in the vicinity of the proposed OlyWest site. These traffic counts were obtained from the City of Winnipeg's Public Works Department, Transportation Division. The table presents current traffic counts on major routes only. The City of Winnipeg 2005 Traffic Flow map is available at:

http://www.winnipeg.ca/publicworks/Transportation/pdf/2005_Traffic_Flow.pdf

It is up to the City to determine if a road has enough traffic to warrant an expansion of the existing infrastructure. The cost associated would also have to be investigated and determined by the City.

P11

2-20

"The overall goals of the City of Winnipeg are apparent from comments in their Development Plan as shown in the following excerpts:

"Winnipeg is characterized as having the most diverse economy in Canada..."

Comments - OlyWest has included an extensive quote from the City's Development Plan with no analysis on how well or why they think they meet the principles within the quote.

Question - Was an analysis done? How well does the Hog Slaughtering plant fit in Winnipeg and the Winnipeg of the future? If so why was it not included?

OlyWest fits the goal of the Development Plan as they will produce a product that will serve the local economy but also the demand in the external economy, providing sustainable economic growth and increased export-based employment. By processing in Canada, net gains are to the Canadian economy and not a foreign company. OlyWest is following environmental regulations for development of a Class 1 facility. They have chosen a location where infrastructure is located. OlyWest has continued with public, private and government consultation to ensure concerns are dealt with. Further, OlyWest will not construct their facility unless they are granted an environmental licence. Please also refer

to the attached City council resolution of November 23, 2005 adopting the recommendations of the thorough study by the Executive Policy Committee.

P12

2-20	<i>"Local empowerment – encouraging citizens to shape decisions that affect their lives."</i>
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Question – Why was this principle not adhered to?

Through the public consultation process, OlyWest has encouraged public participation in the project. Please refer to Section 12.2.5 for a discussion on issues and changes that were incorporated through the progression of the project.

P13

2-25	"radial distance from the centre of the proposed facility"
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Questions – Why was the centre of the plant used? Will odors not be produced from several areas of the plant and the property? Why was the edge of the property not used?

The regional study area was determined as all areas within a 10 km radius of the proposed facility centre while a greater detail of study was conducted within the 3 km radius of the centre of the proposed facility. The odour modeling was completed using the actual sources and locations of odour, meaning sources were modeled assuming they were emitting from their actual physical locations. For further details on the model configuration including point source emission locations please refer to Appendix H.

P14

2-25	"Using these techniques, it is estimated that within the 3 km (1.9 mi) radius, there is an approximate population of 16,644 residents, 5,962 dwellings, and 755 businesses. Within the business total, 13 shopping malls were counted as a single business, as well as 13 schools, 12 daycare/ nursery schools and
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14 churches. There were no hospitals or personal care homes found within the 3 km (1.9 mi) radius. Only businesses were present within the 1 km (0.6 mi) radius, there were no dwellings, residents, schools, daycares/ nursery schools, or churches."

Question – If the same technique was used except using the edge of the property – how many residents, dwellings, businesses, shopping malls, schools, daycare/ nursery schools and churches would be found in this area?

The number of residents etc. in the area would change if the edge of the property were used, however the results would be different depending on which edge of the property was used. However, this exercise is not relevant as no significant effects remain after mitigation, therefore further examination of dwellings, businesses, etc in the project area is not necessary.

P15

2-25	"13 shopping malls were counted as a single business"
Questions – Why were the 13 shopping malls counted as a single business? How many businesses actually exist?	

Each shopping mall was counted as a single business for simplicity however the names of all of the shopping malls were indicated Table 2.13. As no significant effects remain after mitigation, the number of businesses within the shopping malls is not relevant.

P16

4-4	"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."
Questions – Why not use the numbers of a fully expanded plant? What will be the real impact of a fully developed hog slaughtering plant?	

As indicated in the last sentence of the quote provided, the report is based on the full capacity of the plant (9,000 hogs/day). Further, all environmental impacts considered the full production capacity of the facility. Should a future expansion of the facility be required, an environmental assessment would be necessary.

P17

5.1.2	<p>"The maximum water consumption per day will be approximately 3,600 m³/day (951,022 US gal/day) and will occur Monday through Friday while processing 9,000 hogs per day. During the weekend, approximately 800 m³/day of water will be used."</p> <p>Winnipeg drinking water... it just keeps getting better http://www.keewatin.ca/Pages/Winnipeg.html</p> <p>"Safe reliable water has been at the center of Winnipeg's success for more than 80 years. In the early part of the 20th century, securing a safe, reliable and abundant water supply was seen as a major challenge to Winnipeg's growth. After much debate, visionary Winnipeggers elected to proceed with a daring proposal to bring water by aqueduct from Shoal Lake on the Ontario-Manitoba boundary to Winnipeg. Shoal Lake was described as one of the best fresh water sources in the world.</p> <p>The route to Shoal Lake lay across 137 kilometers of wilderness with no road access. The Greater Winnipeg Water District railway had to be built to transport the men, equipment and materials to construct the aqueduct. Construction started May 15, 1915 and Shoal Lake water first flowed from Winnipeg taps April 6, 1919. The total cost of the project was 17 million dollars.</p> <p>Since completion in 1919, the aqueduct has provided Winnipeg with its entire water supply. By the 1990s the aqueduct was in need of extensive repairs or replacement. The cost of a new aqueduct was estimated at in excess of 500 million dollars and so the decision was made to rehabilitate the existing aqueduct.</p> <p>The task was challenging since the aqueduct is the primary source of supply for Winnipeg's water and it could not be shut down for periods any longer than 20 days at a time. This 10 year, 57million dollar project is now almost complete and the aqueduct is expected to provide another fifty years of useful service to the 670,000 residents of the City of Winnipeg."</p> <p>Comment – There are numerous on-line resources, however, they are very long.</p>
<p>Questions – How will this additional use of water impact the 50 year plan? Will the allowed shut down period be shortened? Is there a city plan if a spill taints this water source?</p>	

The water consumption by the proposed facility is 1.2% of the City's current demand and 0.7% of the aqueduct capacity. Please refer to Response C8.1.

P18

	<p>“Transcona Yards Industrial Neighbourhood - 2005 Area Redevelopment Plan</p> <p>2.3 Overall Goals The goals of the Area Redevelopment Plan policies outlined here are:</p> <ul style="list-style-type: none"> a) To allow existing industrial operations to continue. b) To mitigate impacts of future developments on adjacent residential areas by implementing design standards and controls around the periphery of the Plan Area. c) To encourage orderly development of the Plan Area. d) To protect the contribution to the economic base for the City of Winnipeg, that is provided for by industrial operations in the Plan Area. e) To respect the integrity of existing and future residential uses surrounding the Plan Area. <p>“6.2.1 Traffic and Transportation Traffic and general transportation issues have been identified as a primary concern and constraint in this area. The issues are wide ranging from the levels of traffic flow both from industrial and residential uses; to limited public pedestrian connectivity between north and south Transcona; to road conditions and safety, and to the need for higher levels of public transportation.</p>
	<p>High traffic volumes have been identified through the public workshop as a priority issue, in particular along Dugald Road, and also to Pandora Avenue to a lesser degree.</p> <p>Industrial uses within the plan area do contribute to the volume of traffic on these routes, however for the most part, and in particular along Dugald Road, the traffic is generated from outside of the plan area. Dugald Road acts as a significant east-west transportation route both within city limits and also extending outside city limits. Highway 15 (Dugald Road) provides the only crossing of the Winnipeg Floodway between Highway 59 to the north, and the TransCanada Highway to the south. Therefore a significant portion of the traffic volume along Dugald Road, particularly during morning and evening peak hours are not generated from within the plan area (note this is an assumption, and would need to be confirmed through traffic analysis). Further traffic volumes from outside the plan area can be expected to increase with the extension of Ravenhurst Street south from Canterbury Park, and also from further residential development in the community of Oakbank in the RM of Springfield.</p> <p>Additional traffic issues have also been identified which tend to be related to the levels of traffic flow. These issues include safety issues for both pedestrians and vehicles, general maintenance of the transportation infrastructure, and access to Dugald at uncontrolled intersections from South Transcona.</p> <p>Public transit to South Transcona has also been identified as a concern, however this issues has no direct impact on the Plan Area. While requests for expanded transit service have been made in the past, Winnipeg Transit has indicated that the small size of the developed area (about 200 homes) makes it very difficult to provide off-peak service in a cost-effective manner in South Transcona.”</p> <p>http://www.winnipeg.ca/PPD/planning/pdf_folder/TransYards.pdf#search=%20winnipeg%20plessis%20road%20current%20peak%20times%20four%20lane%22</p>

Questions – How were the concerns outlined in this report addressed? How would the proposed Pork Processing Facility add to these concerns?

The proposed OlyWest facility is not expected to add to any of these concerns as this article is in relation to Transcona Yards located between Pandora Ave. and Dugald Road, to the northeast of the St. Boniface Industrial Park. A traffic study concerning the proposed OlyWest development and the St. Boniface Industrial Park has been completed and reports that the influx of traffic would be minimal due to the offset of start times. As well, the hog truck route is planned to follow the TransCanada Hwy to avoid adding traffic problems to Dugald Road.

P19

5-23	<p>5.3.7 Decommissioning</p> <p>"Currently, the anticipated lifespan of the proposed facility is well over 50 years. As a result, there are no detailed decommissioning plans in place at this time. Section 10 includes a description of the general steps that will be followed in the decommissioning of the proposed facility. As relevant rules and regulations pertaining to the decommissioning of the proposed facility will be followed, pollutant exposure levels from the proposed facility and site during decommissioning are expected to be minimal."</p>
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Questions - How can they be so sure? Is this not a very competitive industry? What would happen if a "mad-cow" like disease were to occur? What would be the cost of decommissioning? What would happen if Limited Partnership could not pay for it?

Please refer to Response C3.1.

P20

6-4	<p>"A "health effect" refers to a certain health consequence. Bernard and Lauwerys (1986) defined "biological effect" as a "biochemical, functional or structural change resulting from reaction of an organism to exposure"."</p> <p>Comments - Canadian Handbook on Health Impact Assessment states: "Among all the animal production sectors, hog farming, given its constant growth since the 1970s and its expansion in many rural and even near-urban areas, is often publicly perceived as one of the most polluting agricultural activities. With the rise of this industry, environmental problems and perceived health risks have increased to the point where confrontations have occurred in several municipalities..."</p> <p>It has been clearly shown that adverse health effects result from exposure to various air pollutants generated by hog houses. The specific pollutants of concern are ammonia, particulates, and bacterial endotoxins. The people most at risk are those who work inside the livestock buildings and are in direct contact with the animals. Air pollutants can be divided into three categories:</p> <ol style="list-style-type: none"> 1. gases (including odours); 2. non-biological and abiotic aerosols; and 3. bioaerosols. ... <p>Health effects depend on the size of the particulates – whether they are inhalable or respirable and, if so, how far they can penetrate the respiratory tract. It has been shown that exposure to overly high concentrations of particulates can cause lung inflammation and that chronic exposure leads to bronchitis and asthma..."</p> <p>Source: http://www.hc-sc.gc.ca/ewh-semt/pubs/eval/handbook-guide/vol_4/agriculture_e.html#6.2.4.1 - See Appendix D</p>
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Questions – Why was bronchitis and asthma not dealt with? For staff? For people living in the area? Why was non-biological, abiotic aerosols and bioaerosols not dealt with? Could we have the people who wrote this Handbook review the documentation provided by OlyWest?

As a matter of clarification, the proposed facility is not considered a hog farm as no feeding or long term live animal storage will occur on-site. The proposed facility is a food processing facility.

OlyWest has committed to meet workplace health and safety requirements. Please refer to Response C12.3.

As the OlyWest environmental assessment is a public document, it is available for all to review.

P21

6-43	"In 2001, Statistics Canada reports almost 270,000 dwellings in the City of Winnipeg. Around 177,000 dwellings were owner occupied and 93,000 were
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rented. The average value of a dwelling in 2001 was just over \$105,000. The average gross monthly rental payment in 2001 was about \$540. More recently there have been substantial increases in the rate of sales and housing prices in Winnipeg. Concerning prices, in May of 2006 the average price of a Winnipeg house was around \$140,000 (a 33% increase from 2001, still low by national urban standards) and housing prices have been increasing at a rate of almost 10% before inflation.

That said, housing ownership remains generally affordable with only 12.9% of pre-tax income going to ownership costs. In October 2005, the average rental rate for a 2-bedroom apartment was \$683 (a 26% increase from 2001). Concerning availability within the Winnipeg CMA, in the spring of 2006 there was just over a seven-month supply of complete and unoccupied, single-family detached homes at the recent 12-month rate of absorption of unoccupied units (148 units), while there was an 18-month supply of multiple-family rental accommodations at the recent 12-month rate of absorption of unoccupied units (30 units)."

Questions – Why were current numbers not used? Does any of this information reflect the current situation? Are you using five year old data to support your business plans for the bank?

Recent data has been utilized where available and appropriate. It is common practice to utilize statistical information for demographic information provided by Statistics Canada. The most recent Statistics Canada census data is from 2001. Reports utilized by Earth Tech were credible.

P22

6-43	<p>"Regarding Maple Leaf Foods, in addition to his finding that around 30% of the employees moved to the area, Rounds (2000) also found:</p> <ul style="list-style-type: none"> • Around 84% of the employees live in Brandon and 16% commute (of which almost all commute within a distance of 100 kilometres) • 82% of the employees are 20-44 years of age • About 50% of the employees are married • About 50% of all employees have children and these employees have an average of 2.0 children • 60% of the employees planned to buy or build a home, 30% plan to rent an apartment, and 10% plan to purchase or rent a mobile home or in-house room or suite"
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Question: If Maple Leaf Foods could be successful 5 kilometers from Brandon – Why can OlyWest not be successful 5 kilometers from Winnipeg?

Please refer to Response P3.

P23

6-45	<p>"The above tax revenue estimates are very sensitive to the assumptions made about financial flows, family characteristics and enacted tax rates and conditions, therefore, the amounts should be read as estimates of approximate magnitude only.</p> <p>This one-time, though positive, Environmental Impact Assessment August 2006 tax revenue to Manitoba of \$11.2 million is not significant given budgeted 2006 revenue of over \$2.6 billion and budgeted tax revenue of over \$4.7 billion."</p>
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Questions – What are the assumptions? Where is the math?

The assumptions included corporate and personal income tax rate, capital and payroll tax rate, fuel purchased and fuel tax rate, and education and utility rates. The exact numerical assumptions and the analysis is included in the socio-economic study.

P24

6-50	Table 6.17 and 6.18 Summary of Environmental Impacts
<p>Question – Which independent organization, not paid for by OlyWest, is going to check the accuracy and completeness of these charts?</p>	

The OlyWest environmental assessment report will be reviewed by a Provincial Government interdepartmental Technical Advisory Committee as well as the Clean Environment Commission.

P25

Early on they sent a glossy brochure to people's homes (Excluding some homes nearest to the plant) that touted it was 1.5 kilometers to the nearest home. This is misleading as it is 1.5 km to a pin point dot in the middle of a field, not a 300,000 sq.ft hog plant. Now in Earth Tech's report this 1.5 km circle has now been expanded to 3 km and stating this is the area most likely to be impacted. This area now includes thousands of homes, hundreds of businesses, churches, schools, and a golf course.

Olywest provides quotes in their brochures that imply that not only will property values not decrease they may actually increase due to the increased demand from workers of this plant. There are many homes at approx \$120 000 up to \$600,000 +/- . I have a hard time believing that our homes will increase because \$9 per hour employees will be house shopping in our neighborhood. Olywest was very careful not to make this claim themselves but only to quote other people. I assume this is to prevent being sued if property values decline.

The distance from the closest edge of the proposed OlyWest facility to the closest land zoned residential is 1,176 m. The 3 km radius discussed in the report and presented in the Figures is the detailed area of study requested in the advice document prepared by Manitoba Conservation and does not represent the area most likely to be impacted.

Based on the results of the socio-economic report, summarized in Section 6.8, the facility itself is expected to have no negative effect on surrounding land or properties (Section 6.8.1, pages 6-30 and 6-31).

The same study then predicts a potential increase in the lower-middle to middle house price range in Transcona and River East areas from pressure applied by OlyWest staff moving into the area. The impact is predicted as positive or negative depending on several factors including financial interest, business interest, a person's view of new comers and increasing housing prices and rental rates. Please review Section 6.8.10 starting on page 6-43 for further details.

P26

Earth Tech made very public comments about how they are scientifically neutral and unbiased yet as I go through these reports it appears they have gone out of their way to ignore any reports which do not support their client's position and focuses only on reports which are favorable. In some cases outdated studies have been used where more current reports are available.

Earth Tech is owned by Tyco International, a publicly traded corporation whose mandate is profit to its share holders. Earth Tech knows very well it would not be profitable to prepare unfavorable reports for its clients.

Reports used by Earth Tech are considered to be credible.

P27

Also there are two sections of this document missing and marked "Proprietary". These are "Socioeconomic" and "Mass index" This secrecy is unacceptable and is in keeping with Olywest's pattern of secrecy since the start of the deal.

The mass balance is considered proprietary as it contains trade secrets related to meat cuts. The socio-economic report is considered proprietary as it contains information regarding incentive packages offered to OlyWest. The socio-economic report will be made available for review.

P28

Olywest states that it is impossible for them to locate anywhere else but inside the city. To accept this one would have to deny the existence of Maple Leaf in Brandon which is 5 km out of town. If all things were equal, Olywest would still have a competitive edge over Brandon due to Winnipeg's large labour pool.

Please refer to Response P3.

P29

Enclosed is a Province Of Manitoba guide to siting livestock operations where they state a minimum set back to livestock buildings of 1.6 km and possibly more depending on density of homes and the proximity to recreational areas (Like our golf course). A 4000 head hog barn is clearly a livestock building, Why is this "Guideline" being ignored?

I realize this was written for rural areas but shouldn't the guidelines be at least as stringent for the city?

The guideline pertains to livestock operations, not to food processing facilities. Though the facility contains a holding facility, it is not considered a farm as no feeding or long-term animal storage occur on-site. The site is zoned M3 which is compatible zoning for a processing facility. As a matter of clarification, the maximum capacity of the holding facility is 2,780 hogs not 4,000 hogs.

P30

The location of this plant poses a unique problem in its location. Common city planning practice is to put all slaughter houses, rendering plants, stock yards etc. into one area (A meatpacking district) This plant is being put outside of Winnipeg's existing meat packing district because it was deemed "too dirty". The city of Winnipeg E.P.C. report stated that the old Packer's site wasn't chosen as they envisioned "cleaner and lighter industry" for this area in the future. No one in our area has ever had to tolerate livestock or rendering odors in the past. This should not be permitted.

The site is zoned M3 which is compatible zoning for a processing facility. Please also refer to the attached City council resolution of November 23, 2005 adopting the recommendations of the thorough study by the Executive Policy Committee.

P31

If, despite all the promises and best intentions of the C.E.C. this plant degrades our quality of life who will compensate us?

Please refer to Response C12.4.

P32

If the C.E.C. does their job well and this plant is built with no negative impacts on the community, all of us stakeholders break even. We are no further ahead or behind after the plant is built. However if there are problems, Olywest will profit on the backs of thousands of innocent home owners. Who will compensate us? If laws need to be changed to provide for this so be it. This situation would not be ethically right or morally right even though our current laws make it legal.

Please refer to Response P31. In addition, positive impacts are anticipated in terms of economics and employment as a result of the plant construction and operation.

P33

The clause on Drought outlines the fact that Olywest has signed an access agreement which gives them first right to the City of Winnipeg water supply in event of Draught. Residents would be told not to water lawns or wash cars. Existing businesses could be forced to close so that Olywest could operate at full capacity. The wording of this clause states this is necessary as there will be a large number of animals on site and that it is a food production facility.
The implication here is that the animals are in danger of dying from thirst before they could be killed. Also that somehow if they didn't keep producing food people could starve. This bit of spin is an insult to every intelligent person.

Please refer to Response C8.2.

P34

Olywest also claims that in the event of a malfunction in the odour control system of the rendering plant, they would shut down. Here is a company not willing to risk shutting down in the event of Drought but asks us to trust that they will shut down to protect the community from odour.

In the event of a major malfunction of the air emission control system, the temperature in the protein recycling facility would be such that operations would need to cease.

P35

It is imperative that the recommendation from Brandon/ Maple Leaf license to a sustainability report of the hog industry in the Assiniboine basin be completed before the license application is reviewed. Gary Doer and Stan Struthers assured me in a face to face meeting that this would be done. It was originally to be done by the end of '05. This is the problem with making recommendations after a license is granted and not before.

Manitoba Conservation has prepared a report titled “An Examination of the Environmental Sustainability of the Hog Industry in Manitoba” and is available at:

http://www.gov.mb.ca/conservation/envprograms/livestock/pdf/pig_policy.pdf

P36

Also if the C.E.C. though it was prudent to review hog production in the Assiniboine basin, it is only logical that a study be done on the Red River basin. Again this should be done before a license is granted not after.

Please refer to Response P35.

P37

Gary Doer and Stan Struthers both stated in a face to face meeting that water quality and Lake Winnipeg were their foremost concern.

Why is there no mention of their foremost concern in the scoping document?

The advice document was prepared by Manitoba Conservation. Several areas of the advice document request consideration of surface water quality impacts. Please refer to Response T14.

P38

Olywest indicates to the City of Winnipeg that new hog barns will need to be built within 100 kms to supply the plant (See enclosed) is this of no concern?

Even if only the weanling pigs being shipped to the U.S. are raised locally the resulting increase in manure will be huge.

As a matter of clarification, OlyWest has not stated that hog barns will need to be built within 100 kms of the City of Winnipeg. OlyWest has always stated that there will be enough market hogs available between Manitoba and Saskatchewan to fill the plant. There is an immediate need for additional processing capacity in Western Canada given there is in excess of 5 million hogs being exported to the United States per year. Further to that, given the future plans by Maple Leaf Foods to rationalize older processing plants in Western Canada, hog exports are expected to rise, further compounding the need for additional processing capacity.

P39

Olywest has said odour shouldn't be an issue yet they have taken measures to move the Hog Barn to the far West side of the property. If there is no concern over odor why the need for the increased buffer zone?

Please refer to Response C1.2.3.

P40

Explain why Brokenhead reserve has been singled out for their labour statistics.

Statistics for the Brokenhead First Nation Community were included as the advice document prepared by Manitoba Conservation requested information on regional demographic features be presented and Brokenhead First Nation Community is the closest First Nation Community.

P41

Explain exactly where and how waste remove from site will be disposed of.

Please refer to Response T21 and T42.

P42

Construction tender process needs to be public to ensure Olywest is putting in the full 200 million they have committed to in exchange for the incentives from the Province and city. Also with the large amount of public tax dollars in this deal the cost of construction should be public.

This is outside of the scope of the environmental assessment.

P43

We have been told over and over about the new "Hi-tech" "State of the art" mitigation measures that will be in place at this plant yet the hog barn is ventilated using nothing but fans, no filters, no scrubbers. This is definitely not high-tech.

This barn will smell the same as any other barn with 4000 hogs.

The holding facility is not considered a barn as no feeding or long term live animal storage occurs on site. Further, the holding facility utilizes chimney-like stacks which increase dispersion of emissions. The pens are washed every time they are emptied with a wash water containing a deodorizer. Please refer to Response C1.2.3. As a matter of clarification the maximum capacity of the holding facility is 2,780 hogs not 4,000.

P44

To leave it up to Olywest to be in charge of monitoring their own emissions and housekeeping is ludicrous. They have shown what kind of corporate citizens they are when they locked us out of City Hall.

Please refer to Response T20.

P45

As Olywest currently operates no other rendering plants. This one will be its first. We will be the guinea pigs for this operation. The only thing we can do is compare them to their competitors. Do your research on Rothsay's plant in Dundas Ontario which continues to be fined millions of dollars for odour violations even after recent multimillion dollar upgrades to try to control odour. I believe this plant is also touted as state of the art.

Please refer to Responses T23, T56 and C1.2.3.

P46

The practice of feeding rendered beef remains back to cows is what caused mad cow disease and has since been outlawed. Why do we have to wait for something bad to happen before the law is changed for pigs. Everyone knows the practice of feeding animals back to themselves is wrong.

The Canadian Food Inspection Agency (CFIA), under the federal Feeds Act “administers a national livestock feed program to verify that livestock feeds manufactured and sold in Canada or imported into Canada are safe, effective and are labelled appropriately”.

OlyWest has committed to follow all requirements of the CFIA.

P47

Olywest says that because they plan to be around for at least 50 years there is no need for a decommissioning plan. Tell that to the taxpayers of Winnipeg in 50 years (Or ten years) when they are stuck with clean up costs exactly like Canada packers.

Please refer to Response C3.1.

P48

There should be redundant systems put in place in the event of breakdown or maintenance so that no unfiltered air is permitted out of the building. I realize Olywest is saying that they will simply shut down in the event of a malfunction or interruption of the odour control equipment but, and there is no nice way to say this but I believe they are lying. Again here is a company that won't even slow down in the event of a drought, conspired with Sam Katz to fill City Council seats with hog proponents from Steinbach and Labroquerie and lock Winnipeg citizens out. Now they say trust us. Also, odour control specifications are being provided by the equipment manufacturer. This should be confirmed by independent sources.

Please refer to Responses C8.2 T23 and P34.

P49

Based on water quantities presently being used in Brandon I believe that their estimates on water consumption is in the range of 750 to 1000 liters per hog, not 400 as Olywest states.

OlyWest water consumption was determined by OlyWest based on experience at other Olymel pork processing facilities.

P50

Table 2.1

This table is not correct, the wind directions were gathered at the Wpg regional airport and are not correct for the east end of the city as confirmed by environment Canada.

Please refer to Response C1.2.2.

P51

Section 2.6.2

Earth Tech has downplayed the importance of habitat on site. An independent study needs to be done on this topic.

Please refer to Response T17.

P52

Section 2.8

Upper carbonate aquifer runs 50 to 100 ft below proposed plant, water in test holes found at 46 to 50 ft. Is there risk of contamination to ground water wells?

Please refer to Response T14.

P53

Table 2.3

Alarm bells should be ringing here. There are 125 domestic wells here, can they guarantee no risk to drinking water of wells and aquifer?

Please refer to Response T14.

P54

Section 2.10

2001 information used, info is now incorrect.

Please refer to Response P26.

P55

Section 2.11.5

Does Olywest have a signed contract or agreement with Brokenhead Ojibway Nation in regard to employment? Or is it just verbal?

Please refer to Response P8.

P56

Table 2.9

I would like to see copies of the traffic studies used to complete this table. I reside in this area and do not believe this is true and correct.

Please refer to Response P10.

P57

Section 2.14.1

This project does not comply with Plan Winnipeg 2020 vision and is in violation of several parts of it.

Please refer to Response P11.

P58

Section 2.14.3

Last paragraph sums up why this plant should not be built on this site.

As demonstrated in the environmental assessment report, no significant environmental impacts remain after mitigation.

P59

Section 3.2

Wastewater from truck wash will be discharged directly into the sewer system. Will this water be pre-treated fro nitrogen and phosphorus?

As discussed in section 3.2 on page 3-2, wastewater from the truck wash will be screened using a rotary screen and will pass through an oil/sand interceptor prior to sewer discharge. The trucks are pre-cleaned before being washed to reduce solid material left in the trucks. Please refer to Section 5.3.2.3 starting on page 5-17 for further information on wastewater.

P60

The wastewater and rendering facility will have air scrubbers to filter air, how often are they

Unable to answer this question as it seems pages are missing or only half a sentence was submitted to Earth Tech.

P61

What is the plan when trucks are backed up on the roadways?

Please refer to Response T51.

P62

Section 5.1.2

Table 5.1

This amount of water is incorrect, Please provide documentation as to how figures were arrived at?

Please refer to Response P49.

P63

Section 5.1.3

What is the plan to prevent ground contamination from the diesel fuel tank on site?

To prevent ground contamination from spills, the aboveground diesel tank, will be provided with secondary containment, have concrete stoppers to prevent collisions, and have a limit switch to prevent overfilling. The tank installation will also be in accordance with existing regulations. Further information regarding the aboveground diesel tank is presented in Section 5.1.3.

P64

Section 5.1.4

I would need to hire a scientist to begin to understand this section. What is the risk to the public by having all these chemicals in one location?

As this is a food processing facility, all the chemicals used onsite must comply with Canadian Food Inspection Agency requirements. As well, the majority of the chemicals are contained in a chemical storage rooms which are equipped with chemical product recovery systems. All chemical storage will follow the requirements of the Manitoba Fire Code.

P65

Section 5.1.5

Traffic is already congested to the point of extreme frustration, residences on Plessis Rd south of Dugald road have complained over and over about truck traffic to and from CN Intermodal. We do not need any more traffic in this area, never mind a semi every 4 minutes. What do they intend to do when it becomes unbearable?

Please refer to Response P10. The traffic study found that the additional traffic due to the proposed OlyWest facility would not be significant.

P66

Section 5.3.2.1.

What is this all about? Who considers them minor? Should a proper study not be done on emissions from these types of facilities be done before a licence is even considered? THERE ARE NO EMISSION FACTORS IN THE LITERATURE FOR RENDERING RECYCLING FACILITIES.

A study of the odour emissions was completed for this facility for the purpose of the environmental assessment.

P67

VOC's

What are the effects on all living things?

Please refer to Response C1.2.3 and C1.2.7.

P68

Transportation Emissions

What is the effect of truck and vehicle emissions on all living things?

The trucking industry is a highly regulated industry The trucks transporting the hogs will be regulated under the trucking regulation for truck emission rates. Please see section 7.1.3.2 Hog Delivery and Trucks on page 7-6 for more information on mitigative measures to reduce impacts.

P69

Noise emissions

How is 1000 m used to determine ACCEPTABLE levels? The closest residence is 400 m. Has the noise level of hogs squealing been taken into account? Refrigeration units on the building and refer trucks?

Please refer to T27 and C1.1.

P70

Section 5.3.2.2

Unable to answer this question as it seems pages are missing or only half a sentence was submitted to Earth Tech.

P71

Section 6.3.3.2

The upgrades will not be completed until 2015, what will they do up until that point? What amount of effluent will go into lake Wpg untreated?

What will the odour levels be along the sewage lines to the north end treatment plant?

How can they guarantee EDC's will be treated properly before entering lake Wpg?

Please refer to Response C7.1.

Odour levels are not normally determined for sewage lines. However, it is not anticipated that discernible differences will occur as a result of the OlyWest plant.

Please refer to Response T10.

P72

Section 6.4.2

This location is not consistent with current land use applications and should be put forth as a conditional use within the city of wpg by-law review.

The current City of Winnipeg Zoning By-law 6400/94 lists slaughtering facilities as approved for zoning as an M3 site. Under the new draft By-law 200/2006, slaughtering is listed under heavy manufacturing, which will be zoned as M3. Under the current zoning maps, and draft zoning maps, the site is zoned M3, and is suitable for the proposed facility.

P73

Section 6.4.3

Distance to closest business in the park. A pharmaceutical co is situated 400 m from the proposed facility. Have all health aspects been looked at in this case?

The environmental assessment reviewed both a local study area (3 km radius from the plant), and a regional study area (10 km radius from the plant), where required by the advice document for the proposed facility.

P74

Section 6.5.1.5

There were several species of animal that will be affected by this operation.

Please refer to Response T17.

P75

Section 6.6.2

How can they quarantine the trucks will use the route “they tell them to”?

Please refer to response T30.

P76

Section 6.8.1

How can they guarantee the aqueduct will not be compromised?

Please refer to Response C8.1.

P77

Section 6.8.2

These numbers are not correct based on 4.5 millions hogs, and incoming and outgoing product trucks, blood carrying tankers, etc. Provide an accurate measurement of traffic.

Traffic projections are based on a Traffic Study completed for the project area and included supply and final product trucks. As a matter of clarification the maximum production capacity of the facility is 2.25 million hogs annually not 4.5 million.

P78

Section 6.8.3

The nearest residence is 400 m from the site, others are within 1 km. What gives them the right to justify noise effects based on the fact there are already existing businesses in the area? What will the effect of this plant be on the surrounding areas, exclusive of existing noise?

Please refer to T27 and C1.1.

P79

Section 6.8.4

Define barely perceptible in regard to odour?

Please refer to Response C1.3.7.

P80

Operations

What are the plans to use guest workers, temporary workers, etc as employees in this plant?

There are no plans for guest workers, temporary workers etc. employed at the plant. As a matter of clarification, this question has no relevance to the environmental assessment of the project.

P81

Section 7.1.2

Who will conduct the groundwater monitoring on potential contamination?

Please refer to Response T13 and P44.

P82

Hog Barn

It is indicated that hogs will not be fed for 12 hours prior to shipping to minimize odour. Is it not true this is done to reduce pale, soft, exudative meat and not to reduce the odour issue?

Section 7.1.3.2 on page 7-6 discusses mitigative measures implemented to reduce odour impacts during transportation. Not feeding the hogs reduces the manure produced, and as a result odour. The additional benefit derived from an empty stomach is reduced bacterial counts in the kill floor which in turn enhances the shelf life of pork products. This practice is not intended to influence PSE.

P83

Section 7.1.3.3

The nearest residence is 400 m from the site. What was used to measure the distance to residence and business?

The nearest residence is more than 1,000 m from the proposed facility based on zoning maps and aerial photographs.

P84

Section 8.6

How will the traffic be rerouted when accidents occur with live hog trucks, etc when the route is a main route used by all residences?

As the private road option is still under negotiation with the City of Winnipeg, routes to the proposed facility have not been finalized. Should a traffic accident occur, traffic would be rerouted by City of Winnipeg authorities as required similar to any other accident.

P85

Section 8.9

Drought

Why should Olywest be considered to be a primary customer of water in the event of a drought? Due to the holding of animals? Which will be killed within a short period of time. Are you insinuating the animals need water or they will die? Why should the residents of Wpg play second fiddle to Olywest when it comes to water?

Please refer to Response C8.2. It should be noted that adequate water is vital to protecting the cleanliness of the meat products that are produced for human consumption.

P86

Section 8.10

How will you address the issue of odour in this situation? Why should the city of Wpg accept less than treated water to the sewage system? Has an agreement been signed in this regard?

As described in Section 4.3.1.2 odorous emissions generated in the wastewater pre-treatment facility will be exhausted to the protein recycling facility air emission control system for treatment.

P87

Section 8.14

Where will the BFI bins be transported to dispose of the manure and bedding materials? Which route will they follow? Will they pass by any operations that may pose health problems to its occupants?

Please refer to Response T21.

P88

Section 9

Would it not be wiser to have an independent third party monitoring all aspects of this operation? When the proponent monitors it's own, will there not be room for misinformation?

Please refer to Response P44.

P89

Section 10

Unable to answer this question as it seems pages are missing or only half a sentence was submitted to Earth Tech.

P90

1. Study Area 2.1 No information was supplied by Earth Tech in regards to the social, business, health issues, churches, schools etc. in the 10 km. (6.3miles) radius. This area will effects 352,000 plus people of Winnipeg. This report did ask for this information but Earth Tech and Olywest chose not to supply this because it is half the population of Winnipeg. We need this updated information so the public knows the facts on which this will effect.

As discussed in section 2-1, the 10 km radius was utilized as a regional study area, with a greater detail of study completed on a local 3 km radius. As no significant effects remain after mitigation, the 3 km local radius is sufficient for detailed study.

P91

2. Site Description Pages 2.5 and 2.6 the studies for this survey do not reflex the true wind direction for the city of Winnipeg. Please have EarthTech supply us with all the direction of the compass. N, S, E, W, NE, NW, SE, SW and the % that the wind blows from these directions. It will show that more areas of Winnipeg will have to deal with the hazard odor issues. This is very important.

Please refer to [Figure 4.3 of Appendix H](#).

P92

3. Species at Risk 2.6.2 page 7 this report states that there is a species of frogs (Northern Leopard) that exist on the proposed site. This species is on Canada's endangered species list. The site may be one of the few areas in Canada that these frogs can exist. We should look into this matter closer before we build on this site.

Please refer to [Response T17](#).

P93

4. Section 2.8 Retention pond drainage to the Seine River. The report states that the over flow will run to the Seine River. This could be a hazard to every living thing in that echo system. This retention pond should have some kind of sand filters to help filter the water before we have two river systems that are dying. There should be more information on what will get into the river system there.

The retention pond will collect surface runoff from the site, as well as from other surrounding sites. The retention pond will drain to the other ponds located within the St. Boniface Industrial Park which are pumped into a drain which runs in an east to west direction along Dugald Road which discharges to the Seine River. The retention pond will be owned and operated by the City of Winnipeg. As indicated in Section 5.3.2.4, the pollutants that may accumulate and be transported off the property to the retention pond would be typical of other storm water retention ponds within the City. Please refer to [Response T15 and C9.1](#).

P94

5. Section 2.2.5 Dwellings and Business this section does not address the 10KM. (6.3miles) Radius around the slaughter and rendering plant. It was asked for in the report but Earth Tech and Olywest chose not to supply this information because it deals with 352,000 plus people of Winnipeg. Half the population of Winnipeg! I think that they need this information and I would think that the CEC would want to see some information on these facts.

Please refer to Response P90.

P95

6. Section 3.1 This section gives references to an optional road at the southeast corner of the proposed property. Who will maintain this road? Who will pay for this road? And where exactly will it be located? It also states in this section that a spur rail line could be built also. I have the same question for that also. Please have Earth Tech supply this information for the commission and the public.

The private road option is still under negotiations. Figure 3.2 illustrates the proposed road option and location. The spur line is an option for the future which would require negotiations for its development, however is not currently proposed as part of the development.

P96

7. Section 3.2 Specific provisions for air point source air emission-monitoring facilities. This should be a major point because the area is zoned M 3 hazardous odor area. No study was done. Why shouldn't Olywest be held accountable for this study?

M3 zoning is for industrial use. Please refer to Response T20 and T23.

P97

8. Section 4.2.1 Approximately 210 trucks each with 240 hogs on them will attempt to unload these hogs from only three unloading areas. This study suggests that there will be 8-15 (Dead on Arrival) per day. At 15 per day that is 5475 per year. At 90 pounds at dead weight that would be 492,750 pounds, at 90 cents a pound and that estimate would be low that is \$4,434,750 million per year. Multiply that by 20 years and the number is staggering \$88,695,000 million. Olywest should be made to add at least two more unloading areas to the proposed site for a more humane handling of the hogs.

At full operational capacity, the facility will require three trucks to unload hogs per hour to meet the production requirements. There currently are three unloading bays proposed for the processing facility. It is in OlyWest's best interest to reduce the number of dead on arrival hogs per day. As indicated in Section 5.2.2, Canadian Food Inspection Agency inspectors will observe operations at the OlyWest facility including hog unloading to ensure that the animals are treated humanely.

P98

9. Section 4.3.1 holding facility. The product called SFA should be explained better. What is it? Is it going to cause more health issues with people who have breathing problems? Have Earth Tech supply more details here please.

SFA is a deodorizing product that is non-toxic, biodegradable, and will not harm the environment. It is approved for use in processing facilities by the Canadian Food Inspection Agency.

P99

10. Section 4.3.3 Solid Waste also in 5.3.2.5. It is suggested that Olywest would like to ship 469 tones of solid bedding material to the Brady landfill site. Earth Tech really needs to explain this to the citizens of Winnipeg. The other options are to ship this material to the factory farms that Olywest owns. I find it hard to believe that the small rural communities will allow this. Seeing that the hogs that are on the farms now will have to be larger and the amount of manure that is left on there farms will far exceed the allowable amounts of nutrients that the government will allow them how is this going to work. We need studies on the environment if we plan to dump millions of tones of manure into the Brady dump. I guess that the areas of south Winnipeg might have something to say about the smell of this. The CEC has to request a lot more information on this subject.

Please refer to Response T21 and T42.

P100

11. Section 5.1.2 I believe that the water consumption graphs are very wrong. The water required for each hog to be slaughtered from start to finish should be in the 900 to 1000 litres. I believe that Earth Tech underestimated this figure and that Olywest also told the city of Winnipeg low figures for water consumption so that there water rate that the city of Winnipeg is charging them is lower than it should be. Earth Tech and Olywest should have to come up with better figures a new water s established for them. Verification of the water consumption is very important to both the city of Winnipeg in the rates that they would charge Olywest and to the public interests.

Please refer to Response P49.

P101

12. Section 5.3.2.3 Wastewater. This section mentions the words Endocrine Disrupting Compound. (EDC) Earth Tech needs to explain this compound and what it does. This section also mentions that there has not been any surveys done about this product. Please make Olywest explain this to the CEC and the people of Winnipeg.

Please refer to Response T10.

Endocrine Disrupting Compounds (EDCs) are not a single product but are a group of substances that include pesticides, herbicides, food supplements, natural and artificial hormones, plastic manufacturing products and pharmaceuticals. Over 87,000 such substances have tentatively been identified by the US EPA. Several excellent primers regarding EDCs exist including the following website:

http://www2.ec.gc.ca/eds/strat_e.htm

The OlyWest plant does not expect to discharge any significant amounts of EDCs, due to the variety of processes utilized including protein recycling, primary treatment, and animal delivery and management systems that minimize waste byproducts.

P102

13. Surface Runoff. Seeing that Manitoba has snow for an average 5 months and sometime 6 the snow removal has not been mention in this report. If the snow gets taken away to the snow dumping areas of the city this will contaminate these areas. Seeing that the closest site for Olywest to dump at is right behind the Casino in Transcona this will be interesting when the smell in the spring drives people away from this location. Another 200 million-dollar industry will be affected. Earth tech needs to supply the CEC and the people of Winnipeg with answers to snow problem. If the snow stays on their property it will now be considered runoff to the Seine River. We are back to the contamination issue again. What will Olywest do here?

Please refer to Response C9.1 and C9.2.

P103

14. Decommission. I recommend that Olywest be asked to place a \$30,000,000 million bond to be held by the province to take care of any possible problems in the decommission of the slaughter and rendering plant. Any company that has the M 3 zoning with the words Hazardous waste should be made to hold responsible for all their actions. We are now being asked to clean up a few gold mines in the north country to the tune of 70 million dollars. See the Attached Free Press article dated September 29/06. Olywest advertisements over the past 10 months have said that they are a good corporate citizen let them show Manitoba, the city, and it citizens that this is true with the bond held in trust. The CEC should ask for this from every corporation that comes into our province that has the word hazardous waste or M 3 zoning in its application for a license.

Please refer to Response C3.1.

P104

15. Section 6.1 the Environmental Impact Assessment(EIS) the CEC should ask Olywest to have a panel of people from each of the areas in the 10Km radius from the proposed site. This would give Winnipeggers an insight to what goes on in these hearings.

The CEC Hearings will be public and anyone can attend.

P105

16. Page 6.3 Scaled mapping and its affects on a 10KM. Radius should have been supplied. Earth Tech chose to do it on the smallest scale because the 3-km. radius has only 16,000 people living here. The 10km. radius will affect 352,000 people of the city of Winnipeg. Why was this not done? This report fails the CEC requests for this information and does not give the demographics that we need to make presentation to the CEC.

Please refer to Response P90. Further refer to Figure 2.2 for the 10 km radius scaled mapping.

P106

17. Section 6.3.1.2 page 6.7 Earth Tech assumes that no significant background odor will exist. This statement is totaling wrong. On about the third page in the first volume it states the five areas that odors will exist. Olywest has been telling us for 10 months that we will have NO hazardous odors. Guess what Winnipeg. It will smell!

Please refer to Appendix H which includes the results of the odour modeling conducted on the proposed facility. Please refer to Response C1.2.3.

P107

18. Operation 6.8 Sound levels from the refer trucks will have a direct impact on the residents within 1.5 radius from the proposed plant. The sound will travel more in the wintertime. I suggest that Olywest be made to put up a sound fence around the area that these units will sit in.

Comment noted. Please refer to response T27 and C1.1.

P108

19. Water Vapor sections 6.3.1 page 6.10 why are the studies for photochemical smog not to be found from the NO_x emission listed? This is commonly called hog dust. It has major impacts on peoples health. There are a number of schools within the 10km. Radius and this will cause problems with our children play in this product. Earth Tech should have to supply more information about hog dust and its studies with health concerns.

As is stated in the aforementioned section, a potential exists for photochemical smog to form from NO_x (nitrogen-oxides) emissions. However, as the NO_x emissions did not exceed the acceptable levels, the formation of photochemical smog is not anticipated.

“Hog dust” is particulate matter and mainly consists of feed components and dried waste material (includes undigested feed, gut cells), but may also contain skin cells, insect parts, molds bacteria (endotoxins), viruses, mineral ash, hair, fungi, and pollen (source: Rural Health Extension Program, Centre for Agricultural Medicine, University of Saskatchewan). The practice of misting the hogs in the holding pens will help to mitigate fugitive hog dust emissions.

P109

20. Effects of Runoff 6.3.3.1 why is Earth Tech only considering a 1 in 25 year rain. We are having more weather issues each year and to say the least the weather is changing. With heavy down pours of rain the holding ponds could have a spill over problems. This would contaminate any areas of the city and remember that everything from this plant will flow to the Seine River. The holding ponds need safety factors built into them. Earth Tech needs to address this problem with studies and a safety plan.

The proposed retention pond will be designed to meet City of Winnipeg requirements of two-consecutive 1 in 25 year storm events. The retention pond will drain to the other ponds located within the St. Boniface Industrial Park which are pumped into a drain which runs in an east to west direction along Dugald Road which discharges to the Seine River. Please refer to Response P93.

P110

21. Effluent Impact to Surface Water and Sewage system section 6.3.3.2 Page 6.13 Why hasn't Earth Tech done any studies on what extra protein and animal effluent will have on the sewage lines that will run from the proposed site to the North Main Treatment Plant. The CEC should have the facts on what the maintenance will be to keep the sewage lines clean. Olywest should be made to pay for this extra cost to the city.

Once the pre-treated effluent leaves the OlyWest site via the interceptor sewer, it is considered the responsibility of the City of Winnipeg. The cost to maintain sewer lines utilized by OlyWest will be part of OlyWest's user fees.

P111

22. Nitrogen and Phosphorous loads. Section 6.3.3.4 Page 6-14 and 6-15 EarthTech has failed to give any studies what the extra nutrients loads level would have on the fishing industries. This is a 200 million dollar industry and the extra manure from there factor farms and the extra nutrients levels in our river system will have a large effect on the algae blooms we are now have in Lake Winnipeg. The CEC should wait for the studies that will tell them what if anything is an acceptable and if in fact that the hog industry hog kill our 6th. Great lake Lake Winnipeg. If this study slows the building of the proposed hog plant so be it. See article dated September 29/06 from the Free Press.

Please refer to Response T14.

P112

23. Soils 6.3.4 There are major problems in this report. New government regulations on nutrients are now going into place. The hog industry will have no choice but to follow them to the letter. Small rural communities now have their own agendas on what can be built in their areas and what can be spread on the land around their communities. Our own landfill site falls under close supervision from the Conservation and Environmental Commission. We just cannot dump 469 tonnes of manure and animal byproducts into the landfill site and not suffer any consequence. These are Olywest numbers on what would be going into a dump site. Earth Tech has not supplied any information on what effect this would have on our city landfill site, or any of the small communities around the province. This report also mentions composting on the proposed site. There is absolutely no mention on how this would happen, where it would be located or what the additional smell would cause to the residents of the surrounding areas. The CEC cannot issue a license to Olywest without having them explain their plan to get rid of their waste onto the soil of our province.

Please refer to Response T21 and T42.

P113

24. Drinkable Water 6.5.1.3 the CEC is being asked to allow a single business to dictate water usage for all the city of Winnipeg. The Olywest site will use 1.2% of all the drinkable water that Winnipeg uses in a year. We are being asked that if there is a drought that Winnipeg supply all the water Olywest needs to keep their business running. This company had sales of 2.5 billion dollars. These are their figures from this report from the Free Press article Dated September 29/06. The CEC should set standards that if we have a major drought that Olywest would have to scale back their business until the drought is over. Why should the taxpayers of the city and province have to pay to keep Olywest in business? What benefit is it to Manitoba or Winnipeg for that matter?

Please refer to response C8.2.

P114

25. Section 7 Construction and Operations. Earth Tech has failed to supply information on the aqueduct that runs on the north side of the proposed site. Olywest will have to cross this structure countless times to build there plant. I foresee many problems here. In the 1200 plus pages of this report the word aqueduct is mentioned 5 times. 3 of the times it is for a direction from the main plant site and the other two times is in the history of the property. Earth Tech has failed to include and kind of safety protocols if any sewage would get into our drink water. This aqueduct supplies half the potable drinking water to the city of Winnipeg and some surrounding communities. Earth Tech fails to mention if the 36-inch sewage line will go over or under the aqueduct. I see another Warkington Ontario happening here in Winnipeg. Who will be held responsible? It will be the CEC, Olywest, Earth Tech, the city and the province that's who. It's a long list but someone would have to pay. We need the CEC to ask for a detail plan for safety and anything else that should be in this study. This application should be hauled until this issue is properly answered.

Please refer to Response C8.1.

P115

26. Socioeconomic Impact Mitigation. Olywest should be made to have communications with all the areas of the city within the 10km. radius of the proposed plant. The report suggests that it be limited to 1 year. If Olywest plans to is in our city for a large number of years why would they not want to be good corporate citizens and keep an open dialog with the community.

Section 7.6 on page 7-11 states that OlyWest will communicate with local landowners and residents within a 3 km radius after the first year, and keep the CAC active during the first year to provide input regarding socio-economic and environmental issues. It did not state that communications would be limited to 1 year. As no significant effects remain after mitigation, active communication within a 3 km radius is expected to be sufficient.

P116

27. Contingency Planning Section 8 page 8.1 this section has to do with the water issue again. It talks about drought situation and the fact that Winnipeg will supply water to the plant. Olywest should be made to have a plan in hand to handle this situation. Earth Tech has failed to supply this and should be asked to write a plan for the city and the CEC.

Please refer to Response C8.2.

P117

28. Decommission Page 10-1 this section was addressed earlier. Have Olywest supply a 30 million bond to be held by the province to handle any problems in the decommission of their plant. The article in the Free Press about the 70 million clean of the gold mines comes to mind. We are paying for this Manitoba. We need to take it away from the public to pay for this and put the onus back on the company that caused the problems in the first place.

Please refer to Response C3.1.

P118

29. Air Quality Impact Assessment of the proposed Olywest slaughter and rendering plant. Book 2 section 1.0 page 1-1 Why wasn't the data required on airborne emissions for hog pens, kill and cut operation, boilers dyers and singers. Earth Tech should have to supply this information to the CEC.

As described in Appendix H, section 1.0 on page 1-1, this data is not generally a collection requirement which demonstrates the very low significance of perceived impact that these operations have on the environment. The government does not typically regulate this equipment.

P119

30. Section 4.4 page 4-6 Earth Tech should have to supply detail information on how far the odors will be carried with stack height of 9.6 meters. It should also be asked to include information on higher stacks for better performance. This study should also include every stack for the proposed site. It should also include wind direction information for the CEC to assess. The wind in Winnipeg does not always blow from the South. Winnipeg and the CEC need to know this information before and license can be issued.

As indicated in Appendix H, Section 4.5, meteorological data was used in the odour modelling. This data included hourly information over the 5 year model length. Table 4.1 starting on page 4-1 lists the position of all the sources modeled. It can be seen that all the stacks were modeled as separate stacks. Please refer to Response C1.2.3.

P120

31. Section 4 Model Configuration 4.3 Receptors. The receptor grid for air dispersion should include the 3-km.-radius area. Earth Tech did all the modeling and much smaller area. It should also the 10-km. radius in the model. The 32 discrete receptors should be located east of Plessis Road for the residents that live in South Transcona. There should be receptors on the north side of Dugald Road for the Mission Garden residents and units should also be placed in the Windsor Park and the St. Boniface areas. This would give a model that the CEC has asked for. It would also help with any problems the area residents could have down the road.

Please refer to C1.2.3.

P121

32. Section 3 Book 2 Page 11-4 Access to Information. Olywest is committed to the EA process as a way to supply accurate project information to the local community as well as to all interested individuals. Section 6 11-5 states that Olywest is committed to continue research and development that will encourage new technology and innovation which will further the economic environment, human health, and social well being of our community. These two statements are Olywest own words. Here is what the public will say about this report. It is missing section E and K. Information that the public is not supposed to see. A report that was written by a company that is bias to Olywest. It few recommendation for increase concrete pad depth, a second air scrubber that should have been in place anyway and a road on the south end of Plessis road is not looking after the public interests or answer all the questions that we asked at the two community meetings. I feel that Earth Tech and Olywest have not supplied all the facts, studies and graphs that this report request of them. I am asking you Tracey to halt this application from Olywest until all the questions from the public and the interest groups are answer in full. I also request the missing section E and K and all documents that pertain to those sections. I have requested these three times now by E-mail.

Please refer to Response P27. Section E will be released shortly, while information in Section K contains trade secrets and will be withheld. It should be noted that regulators and the CEC have been privy to the full content of the application including the proprietary sections.

P122

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.

Each section of the report corresponds to a component of the advice document.

P123

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.

As per the publication "First Nation Community Profiles: Manitoba Region – 2004-05" by Indian and Northern Affairs Canada, the Brokenhead Ojibway Nation is approximately 82 km north, while Roseau River Anishinabe First Nation is approximately 92 km south. Please refer to Response P8.

P124

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.

No permits have been issued as an environmental licence has not been granted. Some agreements and contracts are under negotiations.

P125

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.

This is not relevant to the environmental assessment.

P126

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.

Public consultation materials are included in Appendix N.

P127

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.

Please refer to Response P27. As a matter of clarification, OlyWest intends to employ 1,100 people when operating at full production capacity.

P128

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.

This comment has no relevance to the environmental assessment. Acronyms utilized in the report are included in the glossary.

P129

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.

Please refer to Response P11.

P130

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.

The review of environmental licence applications by other proponents is outside of the scope of the environmental assessment.

P131

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.

Hytek Ltd. was previously the majority owner of OlyWest and as of December 5, 2006, Hytek Ltd. has assumed full control of OlyWest, a Manitoba limited partnership. OlyWest is a Manitoba limited partnership which is duly registered with the Department of Finance, Companies Office, to carry on business in the Province of Manitoba. OlyWest, as a legal entity exists and will continue to exist as a limited partnership.

P132

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.

Please refer to Response P16.

P133

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

As indicated in Section 6.3.3.3, the City of Winnipeg operates under an environmental licence. The City of Winnipeg has committed to accept OlyWest's pre-treated effluent and will meet the requirements of their environmental licence. See response C7.2.

P134

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 45 minute time is based on experience at other Olymel facilities.

P135

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

During construction, section 6.6.1 on page 6-22 describes truck traffic as including raw material shipments, construction equipment transportation and dump trucks. Contractor and sub-contractor vehicles are other types of traffic.

P136

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 final traffic study will be released shortly.

P137

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.

Please refer to Section 6.8 for a discussion on the socio-economic impacts of the project.

P138

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.

Mitigation measures were considered and the residual impacts after mitigation were determined. Please review Sections 6, 7 and 8, and/or the impact summary Tables 6.17 and 6.18 for information on mitigation measures utilized at the proposed facility.

P139

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.

Please refer to Response P137.

P140

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'.

Please refer to Response P21.

P141

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.

For information on labour force during construction, please see section 6.8.7 starting on page 6-37. Competition towards other potential construction activities is discussed starting on page 6-38. Please refer to Response P42 information about construction tenders.

P142

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.

Please refer to Section 5.3.2.5 and 5.3.2.6 for information regarding the amount of waste generated and disposal options. Please also refer to Response T21 and T42.

P143

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.

As this is a food processing facility, all chemicals that will be utilized must be approved by the Canadian Food Inspection Agency. Storage of the chemicals must meet the requirements of the Manitoba Fire Code.

P144

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 disruptors. 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 disagree with the assertion that we do not acknowledge the potential for changes to regulations as science evolves. In Section 6.3.3.4 we state that the City of Winnipeg, (who will be responsible for the effluent treatment once the OlyWest plant is online) have clearly acknowledged the need to keep abreast of EDC science and to make changes if and when they become necessary.

Please refer to Response T10.

P145

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.

For information about particulate matter, please reference sections 6.3.1.4 and 6.7.2 of section 6. See also response T29.

P146

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.

Please refer to response P10. Further, Section 2 “Site Description” discusses the existing conditions in the vicinity of the site, whereas increases due to the facility are included in Section 5 “Inputs/Outputs”.

P147

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.

Please refer to Response P16.

P148

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 issued, the environmental licence would be for the maximum production capacity of the plant (9,000 hogs/day) and as such, the assessment was completed assuming the full production capacity.

P149

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.

As outlined in section 4.1 on page 4-1, the plant will operate on a five day work week from Monday to Friday for 250 days per year. The environmental assessment was completed using this operation schedule.

P150

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.

OlyWest will hook up to the City of Winnipeg water supply and will be paying applicable City rates.

P151

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.

Please refer to response P143. Information regarding waste disposal is included in Section 5.3.2.6. OlyWest will comply with National Pollutant Release Inventory reporting requirements.

P152

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?

Table 5.2 lists the uses for all the chemicals under the chemical description. Anhydrous Ammonia fertilizer is used for landscaping purposes.

P153

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

Please refer to Response P151 and P143.

P154

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.

Please refer to Response P136.

P155

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.

Please refer to Response P136.

Please refer to section 6.6.2 and table 6.18 for the impact analysis on the increased traffic.

P156

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.

Please refer to Response P136.

P157

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.

Please refer to response P136.

P158

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

Please refer to response P136.

P159

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.

The City and OlyWest will negotiate for an agreement over maintenance and installation of new infrastructure.

Earth Tech has calculated the greenhouse gas emissions according to standard industry reporting guidelines developed by Environment Canada. Transportation emissions are considered minimal as discussed in section 5.3.2 on page 5-16.

P160

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.

Earth Tech has calculated the greenhouse gas emissions according to standard industry reporting guidelines developed by Environment Canada. Transportation emissions are considered minimal as discussed in section 5.3.2 on page 5-16. Other greenhouse gas emissions are discussed in section 5.3.2 starting on page 5-13. Environmental impacts from greenhouse gas are discussed in section 6.3.1.1 on page 6-5, where it was determined the impact is near the negligible range of greenhouse gas emissions of <1% of the provincial total with a total CO₂ equivalent of 0.06%.

P161

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

Earth Tech has calculated the greenhouse gas emissions according to standard industry reporting guidelines developed by Environment Canada. Transportation emissions are considered minimal as discussed in section 5.3.2 on page 5-16. Please refer to Response P136.

P162

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.

The requirements for an environmental assessment vary depending upon the nature of the project. The environmental assessment for this proposal was prepared using the guidance document provided by Manitoba Conservation, included as Appendix L.

P163

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

Section 7 summarizes some of the planned mitigative techniques to reduce environmental impacts. Air emissions have been mitigated through best available control technology in the protein recycling facility. Please refer to Section 4.3.1.3 starting on page 4-8 for more information on the protein recycling facility air emission control technology. Please refer to Section 5.3.2.1 starting on page 5-11 and table 5.6 on page 5-13 for information on the expected emissions from the facility.

P164

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.

Earth Tech has calculated the greenhouse gas emissions according to standard industry reporting guidelines developed by Environment Canada. Transportation emissions are considered minimal as discussed in section 5.3.2 on page 5-16.

P165

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.

Page 10 of 19 in Appendix L, the advice document specifies “the quantification and likely characterization of the pre-treated process wastewater...and average weekly discharge rates and loading rates”.

P166

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.**

Though the detailed drainage plan has not been finalized, measures have been incorporated to minimize impacts to surface water. Please refer to Section 5.3.2.4 on page 5-19, Section 6.3.3 starting on page 6-12, and Section 7.1.1.1 starting on page 7-1 for further information regarding potential impacts, and mitigative measures in place for potential surface runoff impacts.

P167

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 m³ 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.

Please refer to Response P16. Please refer to Section 4.2 Detailed Process Description for information regarding processing operations at the proposed facility.

P168

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.

The chemical storage room is discussed in Section 5.1.4 on page 5-3. All MSDS sheets for the chemicals listed in table 5.2 starting on page 5-3 are available in Appendix F. A sample emergency response plan is available in Appendix G. Please also refer to Response P143.

P169***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.

Section 4.3.1.1 on page 4-8 states that ventilation rates will be dictated by temperature in three zones in the holding pen area. The ventilation rates provided in the report were specified by OlyWest and represent the ventilation rates which will best manage the facility.

P170***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

Please refer to Response P16.

P171***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.

Please refer to P164.

P172

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 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.

Please refer to Response P164.

P173

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

Please refer to P16.

P174

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'.

Please refer to Response C7.1.

P175

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?

The City of Winnipeg has committed to treating OlyWest's pre-treated effluent and will continue to meet the requirements of their environmental licence. Please refer to Response C7.1. For further information on the system upgrades to the City NEWPCC please refer to Section 6.3.3.3 starting on page 6-13, and figure 6.1.

P176

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.

Please refer to Response P175.

P177

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 ?

Please refer to Response P16.

P178

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).

The environmental assessment assessed the impacts to the environment, with a detailed study of the area within a 3 km radius. This radius included residential receptors, as well as business receptors. Please refer to Section 6 for further information.

P179

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.

Please refer to Responses C4.1, C8.1, and T14.

P180**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 ?

Please refer to Response T30.

P181**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?

The information available in table 6.11 was provided by the City's Public Works Department. Historical collision reports are available on the City website at:

http://www.winnipeg.ca/publicworks/Transportation/collisions_rep_system.asp

Section 8.6 "Transportation Accidents" describes the mitigation measures employed to minimize transportation accidents on-site and within the vicinity of the site.

P182**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.

Air quality guidelines were obtained from Manitoba Conservation Ambient Air Quality Criteria. Noise screening was completed using the Ontario Ministry of the Environment Noise Screening Process for S.9 Application Supplement to Application for Approval and calculated noise emissions were compared to Manitoba Conservation's Guidelines for Sound Pollution. Please refer to page 5-16 and/or Appendix I for further information on noise screening. As mentioned in Section 6.7.1 on page 6-26, this section assesses the health risks

of pollutants released. However, the risk is considered minimal as the majority of the parameters assessed were below acceptable levels.

P183

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.

Please refer to Response C8.1.

P184

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.

Please refer to Responses C4.1, C8.1, and T14.

P185

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.

The socio-economic report was considered proprietary as it contained information regarding incentive packages offered to OlyWest. This information is now being made available for the public.

P186

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.

The information presented regarding the Brandon pork processing facility was used to generate a likely composition of the proposed OlyWest facility labour force. This information is relevant and credible.

The most recent Statistics Canada census data is from 2001 and is still considered relevant until new census data is released.

P187

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.

This is outside of the scope of the environmental assessment. The terms of the loan are still under negotiations and are considered confidential between the Province of Manitoba and OlyWest.

For further information on MIOP, please refer to the following website:

http://www.cbsc.org/servlet/ContentServer?pagename=CBSC_MB%2Fdisplay&lang=en&c=Finance

P188

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.

This is outside of the scope of the environmental assessment. The terms of several agreements/loans etc. are still under negotiations. Information on some of the agreements will be available at the hearings. The socio-economic report will be made available to the public.

P189

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

Please refer to Table 6.1 for an explanation of terms used in impact assessment.

P190

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.

If you are having trouble rotating the pdf, please try printing the pages in question or rotate view on the toolbar menu.

P191

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. .

The listing of media coverage were used to illustrate the extensive coverage and public debate that has taken place from project announcement to July 2006, as mentioned on page 12-1 and 12-5. It was not utilized as proof of consultation. Public consultation is outlined in Section 12.2 starting on page 12-13 and includes information on the public Open Houses, the Community Advisory Committee (CAC), the environmental assessment website and the St. Boniface Industrial Park survey conducted by OlyWest.

P192

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.

The two Open House events were advertised and were open for all to attend where questions could be asked directly to the proponent and the environmental assessment team. Further, the environmental assessment website provided an opportunity for people with questions to send emails directly to the environmental assessment team.

P193*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.

Please refer to Response P16.

The odour modeling considered the emissions of the plant as a whole entity.

P194*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)

Please refer to Response T54 and C17.2.

P195*Appendix K*

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

Please refer to Response P27.

P196*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.**

As indicated in Section 8.13 “Accident Prevention” a sample Health and Safety Policy for the Olymel Red Deer facility was included and OlyWest has committed to employ a similar Health and Safety Policy.”