SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: PROPOSAL NAME:	Freshwater Fish Marketing Corporation Freshwater Fish Marketing Corporation Fish Packing Facility – The Pas
CLASS OF DEVELOPMENT:	One
TYPE OF DEVELOPMENT:	Agricultural – Food Processing Plant
CLIENT FILE NO.:	4604.00

OVERVIEW:

The Proposal was received on January 11, 2001. It was dated December 27, 2000. The advertisement of the proposal was as follows:

"A Proposal has been filed by the Freshwater Fish Marketing Corporation for the construction and operation of a fish packing facility at The Pas. The facility would be located in the industrial park on Morrish Road. Wastewater (washwater and scales) from the facility would be collected in the Town's sewer system for treatment. Culled fish and offal would be disposed of at the Town's waste disposal grounds. Construction is proposed for the spring and summer of 2001, with operation commencing in the fall of 2001."

The Proposal was advertised in The Pas Opasquia Times on Wednesday, February 21, 2001. It was placed in the Main, Centennial, Eco-Network and The Pas Public Library public registries. The Proposal was distributed to TAC members on February 12, 2001. The closing date for comments from members of the public and TAC members was March 7, 2001.

COMMENTS FROM THE PUBLIC:

No public comments were received.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

<u>Manitoba Conservation – Northern Region</u> No objections, the Licence should address the following concerns: 1. In incidences where fish offal wastes cannot be collected and removed within a reasonable time period, refrigerated facilities should be available to store this waste, until it can be picked up for disposal. Offal must be disposed of at the Town of The Pas waste disposal ground and promptly covered. 2.

Every effort must be made to prevent offensive odours from affecting nearby residential areas. 3. Any odour complaints shall be handled promptly, and to the satisfaction of an Environment Officer. 4. Any future expansions to the facility that will include retail sales to the public, must be addressed by applying for a Food Handling Establishment Permit, as required under Manitoba Regulation 339/88R. 5. The facility shall be registered, inspected and approved by the Canadian Food Inspection Agency (CFIA).

Disposition:

Most of these comments can be addressed through licence conditions. CFIA registration is not required for a packing plant when no processing is to be conducted onsite. Disposal of offal at the Town of The Pas waste disposal ground will be done under an agreement with the Town. Burial of the offal would be the responsibility of the Town, and not the proponent.

<u>Manitoba Conservation – Water Quality Management</u> No surface water quality concerns. All wastewater generated from this facility will be directed towards the Town of The Pas' sewage lagoon.

<u>Manitoba Conservation – Air Quality Management</u> A process description is required describing the handling and storage of fish, fish wastes and wastewater, the transport of fish to and from the site, and building ventilation (which may release odours.) In particular, methods and equipment used to prevent or minimize odour releases from the facility should be described. No information is provided regarding the identification of and distances to other businesses in the Industrial Park, or the distances to the nearest residences, schools or other potentially sensitive receptors in the vicinity. Odour emissions from the proposed facility are of concern and should be adequately addressed before a licence is issued. The Department's odour nuisance clause should be incorporated in the licence for this facility.

Disposition:

Additional information was requested to address these comments.

<u>Manitoba Conservation – Terrestrial Quality Management</u> This proposal does not provide the necessary information with which to make an assessment. 1. Will there be any chemicals used on the site that could cause soil contamination in the event of a spill? If there are, what soil textures are present (surface and subsurface) and are there shallow groundwater aquifers? Are there wells in the area which are the source of domestic water? 2. Are there any processes that may result in contaminants being released into the air? 3. What chemical is used in the refrigeration units and what problems may result if there is a release of chemicals? 4. What is the plan to control odours? 5. Where is the plant located in The Pas? How far is this from residential areas? How far is it from other commercial interests that may be impacted by any odours generated?

Disposition:

Additional information was requested to address these comments.

Manitoba Conservation – Policy Coordination No concerns.

<u>Community Planning Services</u> No land use or development concerns. As indicated in the letter from the Town of The Pas, zoning of the property is to be adjusted.

<u>Medical Officer of Health (Environment)</u> that a public health problem will result. Nothing in the proposal indicates

<u>Canadian Environmental Assessment Agency</u> The application of the Canadian Environmental Assessment Act with respect to this project will not be required.

ADDITIONAL INFORMATION:

Additional information was requested on March 5, 2001. A response was received the same day. The additional information was forwarded to Air Quality Management and Terrestrial Quality Management. The information did not address all process related concerns. In a telephone followup with the FFMC contact person, it was confirmed that the proposed plant is a shipping facility only, and that no cutting of fish is proposed. Small truckloads of fish from fishers are repacked for shipment to the FFMC's Winnipeg processing plant. Wastewater consists of washwater from hosing the work area, and all culled fish and washed off scale are proposed for transport to the Town's waste disposal ground. No further TAC concerns have been identified following the receipt of this information.

PUBLIC HEARING:

As no public concerns were identified, a public hearing is not recommended.

RECOMMENDATION:

All comments received on the Proposal can be addressed as licence conditions. Therefore, it is recommended that the Development be licensed under The Environment Act subject to the limits, terms and conditions as described on the attached Draft Environment Act Licence. It is further recommended that enforcement of the Licence be assigned to the Northern Region.

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