



Stantec Consulting Ltd.
500-311 Portage Avenue
Winnipeg MB R3B 2B9

November 17, 2025

Project/File: 111474734/2754.10

Director: Manitoba Environment and Climate Change

Environmental Approvals Branch
Box 35, 14 Fultz Boulevard
Winnipeg, MB, R3Y 0L6

Agnes Wittman, Director

Reference: HyLife Foods Ltd. – Notice of Alteration, EAL No. 1102 RRR

On behalf of HyLife Foods Ltd., please find attached a request for notice of alteration to Environment Act Licence 1102 RRR for changes to the previously licenced pork processing plant.

The proposed alteration comprises the addition of a second Butina controlled atmosphere stunning system within a small building expansion to provide operational redundancy with the existing system at the HyLife Pork Processing facility in Neepawa, Manitoba. No change in processing capacity is proposed.

The effects of the proposed Project on the biophysical and socio-economic environment are expected to be not significant. It is anticipated that the proposed alteration at the pork processing plant will be considered as a minor alteration to the licenced development.

The notice of alteration application fee of \$500, payable to the Minister of Finance, will follow directly from HyLife Foods Ltd. via credit card payment.

Regards,

Stantec Consulting Ltd.



Stephen Biswanger P.Eng.
Senior Associate, Environmental Engineer
Phone: (204) 924-7061
stephen.biswanger@stantec.com

stantec.com

Attachment: NOA application and supporting documents

cc: Sheldon Stott, HyLife Foods LP

HyLife Butina Line Addition Request for Notice of Alteration



Stantec Consulting Ltd.

Prepared for:
HyLife Foods LP

November 17, 2025

Prepared by:
Stantec Consulting Ltd.

Project/File:
111474734

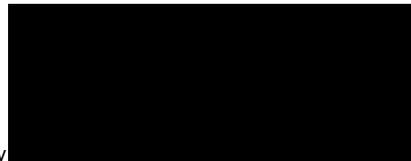
Disclaimer

The conclusions in the Report titled HyLife Butina Line Addition Request for Notice of Alteration are Stantec's professional opinion, as of the time of the Report, and concerning the scope described in the Report. The opinions in the document are based on conditions and information existing at the time the scope of work was conducted and do not take into account any subsequent changes. The Report relates solely to the specific project for which Stantec was retained and the stated purpose for which the Report was prepared. The Report is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient's own risk.

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Prepared by:



Signature

Sean Birkett

Printed Name

Reviewed by:



Signature

Bill Krawchuk

Printed Name

Approved by:



Signature

Stephen Biswanger

Printed Name



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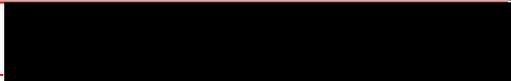
Appendix B Environment Act Licence

Appendix C Certificates of Title



Notice of Alteration Form



File No. : 2754.10	Environment Act Licence No. : 1102 RRR
Legal name of the Licensee: HyLife Foods Ltd.	
Name of the development: HyLife Foods Ltd. Hog Processing Plant	
Category and Type of development per Classes of Development Regulation: Agriculture Meat processing and slaughter plants	
Licensee Contact Person: Sheldon Stott Mailing address of the Licensee: PO Box 100 City: La Broquerie Province: Manitoba Postal Code: R0A 0W0 Phone Number: (204) 424-2313 Fax: Email: Sheldon.Stott@HyLife.com	
Name of proponent contact person for purposes of the environmental assessment (e.g. consultant): Stephen Biswanger. P.Eng.	
Phone: (204) 924-7061 Fax:	Mailing address: 500-311 Portage Avenue Winnipeg, MB, R3B 2B9
Email address: Stephen.Biswanger@stantec.com	
Short Description of Alteration (max 90 characters): Modification to previously licensed facility for a new Butina Line and building addition.	
Alteration fee attached: Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	
If No, please explain: \$500 to follow by credit card payment direct to MECC from HyLife	
Date: November 17, 2025	Signature:  Printed name: Stephen Biswanger, P.Eng.
A complete Notice of Alteration (NoA) consists of the following components: <input checked="" type="checkbox"/> Cover letter <input checked="" type="checkbox"/> Notice of Alteration Form <input checked="" type="checkbox"/> 1 electronic copy of the NoA detailed report (see "Information Bulletin - Alteration to Developments with Environment Act Licences") <input checked="" type="checkbox"/> \$500 Application fee, if applicable (Cheque, payable to the Minister of Finance)	Submit the complete NoA to: Director, Environmental Approvals Branch Environment and Climate Change Box 35, 14 Fultz Blvd Winnipeg MB R3Y 0L6 EABDirector@gov.mb.ca For more information: Toll-Free: 1-800-282-8069 Phone: 204-945-8321 Fax: 204-945-5229 https://www.gov.mb.ca/sd/permits_licenses_approvals/eal/licence/index.html
Note: Per Section 14(3) of the Environment Act, Major Notices of Alteration must be filed through submission of an Environment Act Proposal Form (see "Information Bulletin – Environment Act Proposal Report Guidelines")	

1 Introduction

1.1 Project Overview

HyLife Foods LP (HyLife Foods) operates a pork processing plant along PTH 16 in the Town of Neepawa in southwestern Manitoba (Appendix A, Figure 1). The operation of the existing pork processing facility is governed by Environment Act Licence No. 1102 RRR (Appendix B).

HyLife Foods has recently experienced operational challenges with the existing Butina carbon dioxide (CO₂) asphyxiation process at the plant. The age of the current Butina equipment, a primary step in the operation of the processing plant, presents an operational risk due to increased down-time occurrences and related stand-by costs. The proposed alteration (the Project) involves installing a second parallel Butina line to mitigate dependence on a single line, enabling continued plant operations during maintenance or downtime of the Butina line. The alteration will require a small building addition to accommodate the additional equipment and livestock movement. No increase in licensed processing capacity is proposed.

Section 14(1) of *The Environment Act* requires a proponent to notify the Director (for Class 1 and 2 developments) if the proponent intends to alter a licenced development so that it no longer conforms to licence conditions or has the potential to change the environmental effects. The intent of this NOA application is to obtain an updated Environment Act Licence as defined in *The Environment Act Classes of Development Regulation*, M.R. 164/88. Under this regulation, the existing facility is considered a Class 2 Development.

This NOA report has been prepared by Stantec Consulting Ltd. (Stantec) on behalf of HyLife Foods L.P. in accordance with Manitoba Environment, Climate and Parks (MECP, now Manitoba Environment and Climate Change [MECC]) Information Bulletin, "Alterations to Developments with Environment Act Licences" (2022). This report documents the currently licensed facility operations, the proposed alteration related to the Butina line addition, and the potential environmental effects and planned mitigation measures associated with its operation. This NOA report is submitted as supporting information to the Notice of Alteration Form for licensing consideration by MECC.



1.2 The Proponent

For the purposes of development licensing, the proponent is HyLife Foods LP (hereafter "HyLife Foods"). For further information regarding HyLife Foods, please contact the following:

Mr. Sheldon Stott, P.Ag.
Director of Corporate Sustainability
HyLife Foods Ltd.
PO Box 100
La Broquerie, MB R0A 0W0
Telephone: (204) 424-2313
Email: Sheldon.Stott@HyLife.com

This Notice of Alteration was prepared by Stantec Consulting Ltd. The local contact is:

Mr. Stephen Biswanger, P.Eng.
Senior Project Manager, Environmental Engineer
Stantec Consulting Ltd.
500-311 Portage Avenue
Winnipeg, MB R3B 2B9
Telephone: (204) 924-7061
Email: stephen.biswanger@stantec.com

1.3 Land Ownership and Property Rights

The existing pork processing plant is located in the Town of Neepawa on property owned by HyLife Foods. The legal description for the subject property is described as SW 35-14-15 WPM and Lot 5, Plan 7402 NLTO) encompassing approximately 49.11 hectares. Current Certificates of Title for the property (the site) are CT# 3299179/5 and CT# 3299180/5 (Appendix C). The pork processing plant (and general office) currently occupies approximately 29,300 m² on the site.

1.4 Existing Conditions

The parcel of land for the proposed project, part of SW 35-14-15 WPM, is privately owned and has been occupied by HyLife Foods for industrial food processing since 2007. The land uses adjacent to HyLife Foods' plant site include a mix of commercial/industrial, rural residential, and open space/recreational. The site is located in the Town of Neepawa, zoned "MH – Industrial Heavy" under Zoning By-Law No. 3184-18, and designated as a conditional use. The current use is legally recognized as an existing conditional use under the by-law. The proposed location of the building addition is already developed as part of the HyLife facility compound and is considered previously disturbed. The existing environment in the area has been described in previous HyLife NOA submissions, specifically within the 2016 NOA. Readers are referred to the prior NOA (Stantec 2016) for details if required.



The site is accessible from Provincial Trunk Highway 16 (PTH 16). Major roads surrounding the site include PTH 5 located approximately 3.6 km to the west (running north/south) and Provincial Road (PR) 352 located approximately 12.7 km to the east (running north-northwest/south-southeast). There is no direct rail service at the site. An electric transformer provides power to the processing plant via overhead utility lines located adjacent to the western and southern boundaries of the site. Other utilities on-site include natural gas lines, wastewater treatment at the adjacent R3 Innovations Industrial Wastewater Treatment Facility (IWWTF) and potable water from the Town of Neepawa.

1.5 Scope of the Assessment

1.5.1 Spatial and Temporal Boundaries

For the purposes of this environmental assessment, Local Assessment Area (LAA), and Regional Assessment Area (RAA) have been kept consistent with boundaries as defined in the previous 2022 processing plant NOA. The temporal boundaries for the assessment are defined as Construction phase, Operation phase, and Decommissioning phase. Spatial and temporal boundaries are summarized in Table 1.1.

Table 1.1 *Spatial and Temporal Boundaries*

Spatial Boundaries	Temporal Boundaries
Project Site (PS) – the approximately 12.5 ha developed area occupied by the 30,000 m ² processing facility and office building (approx. 1.6 ha) within the subject property, defined as being within part of SW 35-14-15 WPM (see Figure 2 in Appendix A)	Construction phase – a period of 12 months in 2025/2026 over which construction is planned to occur
Local Assessment Area (LAA) – area up to a three-km radius from the PS (area over which direct effects of the project are expected to occur) (see Figure 3 in Appendix A)	Operation phase – the period over which the facility will be in operation, at least 50 years
Regional Assessment Area (RAA) – area up to a ten-km radius from the PS (area over which direct effects that act on the PS are compared to determine significance of residual effects) (see Figure 3 in Appendix A)	Decommissioning phase – there are currently no plans for the facility to be decommissioned. Should decommissioning occur at some point in the future, it would be anticipated to consist of the removal of all HyLife Foods equipment from the site. Decommissioning would be conducted according to Licence conditions and regulatory requirements at the time.



1.5.2 Assessment Approach

This assessment was completed to meet the requirements of a request for NOA and includes assessing project-specific environmental effects. The assessment focuses on valued components (VCs), which are environmental components of certain value or interest to regulators and other parties and are identified based on the biophysical and socio-economic elements. Project-related effects on these VCs are assessed sequentially in the assessment. Residual effects are characterized using specific, predetermined criteria (e.g., direction, magnitude, geographical extent, duration, frequency, reversibility).

1.5.2.1 Selection of Project Interactions and Valued Components

Biophysical and socio-economic VCs that could be affected through interactions of the environment with the project are identified to scope the assessment. The rationale for selecting each VC is explained and potential interactions between the project and VCs are identified in Table 1.2.

Table 1.2 Designation of Valued Components

Valued Component	Potential Project Interaction	Rationale for Exclusion or Inclusion and Project Potential Effect
Air quality	✓	Construction activities contribute to airshed loading from on-site equipment and truck usage.
Greenhouse gas emissions	✓	Construction and operation activities are expected to generate greenhouse gas (GHG) emissions from on-site equipment and truck use during construction, as well as carbon dioxide (CO ₂) emissions resulting from the operation of the proposed additional Butina line and the increased combustion-sourced heating required for the expansion of the existing building.
Soils/terrain	x	Expansion of the building footprint on the site will result in limited disturbance of soils that have been previously disturbed during past developments on the property. An emergency response spill kit will be maintained and emergency response measures for spill clean-up and remediation will be implemented if necessary.
Surface water/ groundwater	x	The proposed addition will be located on the existing developed property. Stormwater will continue to be managed by surface ditching. The potential to affect surface water quality of the Whitemud River (approximately 1 km away) is considered very low and mitigable with implementation of industry-accepted practices such as silt fences and erosion control measures to manage surface drainage flow. Dewatering will be required during project construction. Water will be redirected to existing on-site surface ditching with silt fencing (if required) to control sediment transport.
Vegetation	x	No native vegetation is present at the proposed project location on the site.



Valued Component	Potential Project Interaction	Rationale for Exclusion or Inclusion and Project Potential Effect
Wildlife and wildlife habitat	x	No substantive wildlife or wildlife habitat is present at the proposed project location on the site.
Property and land use	x	Site activities occur within an existing industrial area that has supported the current land use for many years. The site is zoned for the existing/proposed land use.
Infrastructure and services	✓	The proposed alteration will generate construction traffic. An increase in the size of the plant for the proposed additional Butina line installation will increase the use of electricity, water and natural gas at the site.
Employment and economy	✓	Benefits related to employment, tax generation from construction and continued operation. Installation of an additional Butina line will allow for more efficient/consistent operation of the processing plant, maintaining reliable operations at the plant and consistent employment.
Heritage resources	x	The site is located within an existing industrial area that is already disturbed; there are no heritage concerns.
Aesthetics and Noise	x	The site is located within an existing industrial area with the proposed alteration consistent with current building types and there will be no substantial change to area visual aesthetics. Noise generation will continue to be typical of historic use in the area, and no noise complaints have been received by HyLife during previous construction and plant expansions.
Health and Safety	x	Contractors engaged in the construction phase of the proposed project will be subject to site specific health and safety plans and worker protection standards and procedures under the provincial <i>Workplace Safety and Health Act</i> . The additional Butina line is not expected to present new hazards; the existing worker health and safety programs will be updated (as needed) and maintained.

Following the identification of valued components with identified potential project interactions, an analytical framework is used to evaluate and characterize the potential project effects based on standardized criteria to facilitate quantitative (where possible) and qualitative assessment of residual environmental effects.



1.5.2.2 Residual Effects Description Criteria

Terms used to characterize the residual environmental effects are summarized below.

Table 1.3 Characterization of Residual Environmental Effects

Characterization	Description	Quantitative Measure or Definition of Qualitative Categories
Direction	The long-term trend of the residual effect	Positive— an improvement in the valued component compared with existing conditions and trends Adverse— a decline in the valued component compared with existing conditions and trends Neutral— no change in the valued component from existing conditions and trends
Magnitude	The amount of change in the VC relative to existing conditions	Negligible—no measurable change Low— a change that falls within the level of natural variability Moderate— a measurable change which is unlikely to affect the valued component High— a measurable change which is likely to affect the valued component
Geographic Extent	The geographic area in which an environmental effect occurs	PS—residual effects are restricted to the project site LAA—residual effects extend into the LAA (up to a 3-km radius from center of the PS) RAA—residual effects extend beyond the LAA to other adjacent areas to the property up to a 10-km radius of the PS, inclusive of the LAA
Frequency	Identifies when the residual effect occurs and how often during the project or in a specific phase	Single event— residual effect occurs once throughout the life of the project Multiple irregular event— residual effect occurs sporadically and intermittently (no set schedule) throughout Multiple regular event— residual effect occurs repeatedly and regularly throughout Continuous—residual effect occurs continuously throughout the life of the project
Duration	The period of time required until the VC returns to its existing condition, or the effect can no longer be measured or otherwise perceived	Short-term— residual effect restricted to the duration of construction (assumed to be 12 months) Medium-term— residual effect extends up to 10 years Long-term— residual effect extends for longer than 10 years
Reversibility	Pertains to whether the VC can return to its existing condition after the project activity ceases	Reversible—the effect is likely to be reversed after activity completion and decommissioning Irreversible—the effect is unlikely to be reversed even after decommissioning



Characterization	Description	Quantitative Measure or Definition of Qualitative Categories
Ecological and Socio-economic Context	Existing condition and trends in the area where environmental effects occur	Undisturbed—area is relatively undisturbed or not adversely affected by human activity Disturbed—area has been substantially previously disturbed by human development or human development is still present. For the purposes of this NOA application, all VCs have been assumed to exist in a disturbed ecological and socio-economic context.

1.6 Public Engagement

Public engagement will be fulfilled through the placement of the NOA on the Public Registry (if required) for public review and comment.

1.7 Funding

HyLife Foods will provide funding for all undertakings related to the project.



2 Project Description

2.1 Existing Licensed Development

HyLife Foods has operated the pork processing plant in its present location since 2007 (Appendix A, Figure 1). The plant and general office occupy approximately 3 ha on the site as shown on the site plan provided in Appendix A, Figure 2. The facility is presently approved to process up to 46,385 hogs/week (annual average, MECP 2022).

The plant currently operates with a single Butina line (a controlled atmosphere stunning system using CO₂ for asphyxiation) that can process approximately 700 hogs per hour. Following the receiving and resting of hogs in the receiving facility, the hogs are directed from the receiving facility to the Butina system via a drive alley with auto moving gates. The gates direct the hogs onto an electric powered gondola that lowers groups of seven to eight hogs into a CO₂ supply pit. After the hogs are asphyxiated, they are lifted out of the pit and moved onto a shackling table. Shackled carcasses are placed on a vertical conveyance system in the dirty kill area to be bled and then scalded. Carcasses are then dehaired, singed, and polished before going to the clean kill area and on for further processing in the plant.

More information on the other processes at the facility can be found in previous NOA submissions (Stantec 2016; Stantec 2017; Stantec 2018a, b; Stantec 2019a, b; Stantec 2022).

2.1.1 Chemical Usage

Typical operational chemical inputs for the processing plant operation (excluding fuel) include CO₂ (stunning), CO₂ (dry ice), chlorinated detergent, foaming acid cleaner, and caustic powder cleaner. CO₂ for the Butina system is supplied by aboveground steel tanks (50-tonne) located on the north side of the plant. The CO₂ storage system is presently refilled approximately 12 times per month by truck delivery.

2.1.2 Water Use and Wastewater Production

Water use and wastewater production at the facility has been summarized in previous submissions (see Stantec 2019a). Under the currently licenced production rates, the processing plant is expected to produce up to 2,290 m³/day of wastewater (Stantec 2022). All process and sanitary wastewater is pre-treated at the plant via the existing screen and DAF (Dissolved Air Floatation) units along with pre-treatment equipment (rotary drum screen, lift station, a flow pre-attenuation control tank) prior to discharging to the R3 Innovations IWWTF. The Butina line uses a negligible amount of water for its clean-in-place system (Stott 2025 pers comm.). The estimated annual production day average requirement for sanitation water in the kill floor area is 75 m³ to 100 m³.

2.1.3 Workforce

The dirty kill area (including the Butina line) has a standard shift complement of 15 personnel.



2.1.4 Health and Safety

HyLife Foods' commitment to the ongoing health and safety of its employees remains in place (HyLife Foods 2019). HyLife's health and safety plans are available for review upon request.

2.2 Proposed Alteration

The proposed project is the construction and operation of an additional Butina line and a corresponding electrical room within an approximately 524 m² addition to the north side of the facility. This new line will operate in parallel with the current asphyxiation process, thereby minimising downtime and supporting uninterrupted plant operations during periods when one of the existing Butina lines is offline due to maintenance or unexpected interruptions. There is no increase in the licenced processing capacity of the plant proposed. Figures showing where the planned project addition will occur, the current state of the Butina line area, and the proposed state of the Butina line area can be found in Appendix A (Figure 4 and Figure 5).

The new Butina line project will include the following components:

- An extra drive alley with automated gates for directing hogs from the receiving facility to the Butina line
- An electric gondola system that holds seven to eight hogs in alternating positions, and a CO₂ pit
- An additional shackling table and conveyance system
- An extra blood pan and sticking station
- An approximately 28 m² additional electrical room

The additional processing line will be able to operate at the same speed as the current system and is designed to process up to 700 hogs per hour. During typical operations, both the new and existing Butina lines would function at 50% capacity, with either line capable of running independently at higher speeds during maintenance or downtime. Alternative operation schemes (such as alternating line operations by shift) may be implemented depending on daily operation factors. The shackle conveyance system will facilitate carcass movement, integrating with existing infrastructure to ensure continuous processing through the subsequent processing stages at the plant.

No changes are proposed for the plant's electrical, water or wastewater handling systems, aside from accommodating the sanitation of the additional equipment and building addition. The plant's current electrical supply is adequate to support the new line. Increases in natural gas use for building and water heating are anticipated to be negligible. Increased water use and wastewater generation for equipment, building sanitation, and additional staff are also anticipated to be negligible, and will be accommodated by existing systems. No additional on-site CO₂ storage capacity is proposed as part of this project.

Construction is scheduled to take approximately 12 months, commencing as soon as Fall 2025, subject to regulatory approval.



2.2.1 Construction Inputs and Outputs

During the construction phase of the proposed alteration, materials required will include steel framework and a steel deck roof, concrete flooring, and insulated metal panel walls. These materials will be brought to the site from material suppliers. There may be temporary storage of construction materials in previously developed areas on the site.

Outputs during construction could include surface runoff and fugitive dust and vehicle emissions from construction equipment. Other potential outputs generated from construction work would be related to spent packaging materials, solvents, used oils, surplus building materials, etc.; these will be regularly transported off-site and disposed of or recycled at a waste facility approved to handle the waste materials, according to applicable regulations.

A peak workforce of 35 - 40 construction staff will be involved in project construction. On average, less than 20 additional personal vehicles associated with construction staff travel and less than 10 pieces of additional construction equipment (e.g. excavator, dump truck, skid steer, etc.) are anticipated on-site during the construction phase.

2.2.2 Operation Inputs and Outputs

2.2.2.1 Chemical Usage

Chemicals described in Section 2.1.1 are expected to remain the same and consistent with those described in the 2022 NOA. CO₂ usage is conservatively estimated to increase from 2024 levels of 1,380 tonnes of CO₂ to approximately 1,600 tonnes of CO₂ to accommodate the operation of the second chamber. There will be no change in CO₂ storage capacity. To meet requirements for the additional Butina line, CO₂ deliveries to the plant are expected to increase from approximately 12 shipments per month to about 14 shipments per month. Sanitation chemical usage will increase marginally in proportion to the building expansion size compared to the dirty kill processing area of the existing facility, with the types of chemicals remaining consistent with those already in use. All sanitation chemicals will continue to be stored in designated storage area(s)/room(s), which have adequate capacity.

2.2.2.2 Water Use and Wastewater Production

The operation of the new Butina line does not require an appreciable amount of water; however, the additional equipment and proposed building addition will increase the area to be cleaned as part of the sanitation shift. The change in water use from cleaning is estimated to increase proportionally with expansion of the kill floor area of the existing plant. The proposed 524 m² expansion increases the kill floor area by approximately 496 m² or 23% to approximately 2,686 m². Therefore, the project is expected to increase the production day average requirement for sanitation water within the kill floor from 75 m³ to 100 m³ (as stated in Section 2.1.2) by approximately 17 m³ to 23 m³, for a total of approximately 92 m³ to 123 m³. However, this increase is negligible (<1% increase) compared to the total amount of wastewater generated at the approximately 29,300 m² facility.



Addition of 2 staff per 15-person shift (see Section 2.2.2.5) within the dirty kill processing area will contribute negligibly to increased water use and wastewater generation, compared to the total 2021 staff complement of 1,652 (Stantec 2022).

2.2.2.3 Fuel, Electrical and Gas Utilities

Natural gas demand will rise slightly with the expansion, but no changes to the facility's gas service are required. Existing electricity service to the plant, supplied by a single substation west of the site and the existing transformer, will meet the increased power needs for the Butina line expansion. The project will not affect on-site fuel usage.

2.2.2.4 Waste Management

The composition of generated wastewater is not expected to change substantially. As no new processes are proposed and the increase in wastewater generated is anticipated to be less than 1% of the total wastewater generated at the processing plant, no material changes in operation of the R3 Innovations IWWTF are anticipated.

No additional waste or byproducts will be generated that differ from existing operations. The volumes of domestic waste and recyclables are not anticipated to change with the proposed expansion.

2.2.2.5 Workforce

The additional Butina line will add two additional workers per shift. With two shifts per day, a total of four additional staff will need to be hired.

2.2.2.6 Traffic Volumes

The operation of the project will result in increased inbound and outbound traffic at the site, including additional personal vehicles for four new staff members and an extra 2 truck deliveries per month for CO₂ replenishment of the on-site storage tank serving the Butina lines.

2.3 Project Schedule

The start of the construction phase is expected to be Fall 2025 with completion by Winter 2026, subject to receipt of regulatory approvals.



3 Environmental Effects and Mitigation

This section outlines the assessment of environmental effects for those valued components identified as having potential project interactions (denoted by a ✓ in Table 1.2). Components included in this assessment are Air quality; Greenhouse gas emissions; Infrastructure and services; and Employment and economy.

3.1 Assessment of Environmental Effects

3.1.1 Air Quality

During the construction phase, Project-related changes to air quality can occur due to exhaust emissions from the temporary increase in vehicle and construction equipment at the PS. Effects will be mitigated by using properly maintained equipment and vehicles, and by limiting unnecessary idling of vehicles on the site. With the proximity of the site to traffic on PTH 16 and existing on-site operational traffic, the potential adverse effect of emissions from construction equipment and vehicles is expected to be incremental but negligible, limited to the LAA, short term (limited to the construction phase), multiple irregular in frequency, and reversible upon completion of construction of the project.

The generation of fugitive dust from on-site traffic movements and site excavation and grading can affect local air quality and may result in irritation to nearby residents, particularly during dry periods. The potential changes in local air quality from construction phase fugitive dust emissions will be mitigated by applying water as required to the unpaved portions of the site affected by the project, as necessary. Further, the residual effects from dust emissions are expected to be negligible given the separation of the site from residents, prevailing wind directions, and a lack of dense residential development in proximity. With mitigation in place to address excessive dust generation, resultant air quality effects from construction of the addition are expected to be negligible, limited to the LAA, short term (limited to the construction phase), multiple irregular events, and reversible upon completion of construction of the project.

Operationally, an increase from 12 to 14 truck visits per month for CO₂ replenishment and potential personal vehicle usage for the 4 additional staff for the new Butina line, in the context of current site and highway traffic, is expected to generate a negligible increase in operational exhaust and fugitive dust emissions at the project site. Adverse air quality effects from the increase in operational traffic are expected to be negligible, limited the LAA, occurring with a multiple regular frequency, short-term in duration, and reversible upon decommissioning.

During the operation of the proposed Butina line addition, air quality effects from increased natural gas consumption associated with the slightly larger building and associated heating requirements is anticipated to be an adverse, negligible effect, limited to the LAA, short-term in duration continuous in frequency and reversible upon decommissioning.



The potential adverse effects on air quality from emissions during construction are expected to be negligible, limited to the LAA, short-term in duration, multiple irregular in frequency, and reversible upon decommissioning. During operation, adverse potential effects on air quality from emissions are anticipated to be negligible, limited to the LAA, short-term in duration, continuous in frequency, and reversible upon decommissioning.

Odours typical of some construction processes and materials may also be generated during the construction phase of the project, including those associated with asphalt roofing, adhesives, painting, etc. The activities generating these odours are expected to be short term, occurring multiple times irregularly over the construction phase. The prevailing wind direction for Neepawa (based on the Brandon, Manitoba meteorological station) is principally from the west (Environment and Climate Change Canada 2025). Although the closest residence to the PS is located approximately 336 metres west; the lands surrounding the site are largely agricultural or industrial in nature and are sparsely populated. The prevailing wind direction, combined with the short-term duration of odour-generating activities and a lack of dense residential development mitigates the effect of construction-phase odour generation at the site on air quality in the LAA. Adverse effects associated with odour generation during the construction phase are anticipated to be negligible, limited to the LAA, short-term in duration, multiple irregular in frequency, and reversible upon decommissioning. During operation, no additional adverse effects on odour generation are anticipated.

Overall, adverse effects of the project on air quality during the construction phase are anticipated to be negligible, limited to the LAA, short-term in duration, multiple irregular in frequency, reversible upon decommissioning, and occurring within a disturbed context. During operation, adverse effects are anticipated to be negligible, limited to the LAA, short-term in duration, continuous in frequency, reversible upon decommissioning, and occurring within a disturbed context.

3.1.2 Greenhouse Gas Emissions

Greenhouse gas (GHG) emissions are currently generated at the pork processing facility by natural gas (process water and space heating), electricity use, fuel (on-site vehicle and equipment use), and CO₂ stunning (existing Butina line), and will continue to be generated as part of the proposed project. The natural gas consumption at the plant for process water heating and fuel consumption for on-site vehicle and equipment use is anticipated to remain in line with existing values. In 2024, natural gas usage was reported to be 5,660,000 m³ and diesel usage was reported to be 612,627 L (Stott 2025 pers comm.).

GHG emissions associated with personal vehicles and heavy construction vehicles travelling to and from the construction site are anticipated to be negligible. Although negligible, greenhouse gas emissions associated with CO₂ trucking deliveries are anticipated to increase, due to the increase in trucking delivery frequency of 12 trucks per month to 14 trucks per month.



The use of natural gas to heat the buildings and generate process heat on-site produces CO₂, CH₄, N₂O, NO_x, CO emissions, volatile organic compounds (VOCs), trace sulphur dioxide (SO₂) and particulate matter (PM). Natural gas usage at the plant during 2024 was 5,660,000 m³ (Stott 2025 pers comm.). It is anticipated that the proposed alteration would result in a negligible increase (<1% of natural gas consumption in 2024) in annual plant natural gas usage.

Previous total annual operational GHG emissions at the HyLife Foods facility were 14,531 tonnes of CO₂e in 2023 and 13,967 tonnes of CO₂e in 2024) (Stott 2025 pers comm.). With an additional 220 tonnes of CO₂e to be emitted (associated with the increase of Butina line CO₂ usage), the total annual operational GHG emissions at the HyLife Foods facility is estimated to increase by approximately 2% compared to the previous two calendar years.

GHG emissions reported in 2023 by the Province of Manitoba in Canada's National Inventory Report 1990-2023 totaled 21,300,000 tonnes of CO₂e (Environment and Climate Change Canada 2025). HyLife Foods' facility GHG emissions remain negligible in comparison to total provincial greenhouse gas emissions, being <0.001% of Manitoba's annual greenhouse gas emissions. As such, both the existing plant and the Butina line addition are not considered a major contributor of greenhouse gas emissions.

The proposed alterations during construction are expected to have a negligible adverse effect on GHG emissions in the RAA (provincially), long-term in duration, multiple irregular in frequency, irreversible upon project decommissioning, and occurring within a disturbed context. During operation, effects are anticipated to be adverse, negligible, limited to the RAA, long-term in duration, continuous in frequency, and irreversible upon decommissioning, and occurring within a disturbed context.

3.1.3 Infrastructure and Services

During the construction phase, there will be an increase in the vehicle traffic along PTH 16 associated with transportation of construction equipment, personnel, and associated materials to and from the PS. On average, less than 20 additional personal vehicles associated with construction staff travel and less than 10 pieces of additional construction equipment (e.g. excavator, dump truck) are anticipated to operate on the site for the construction phase. Vehicular access to the construction area will be limited to existing access points to reduce potential conflicts with local traffic from turning vehicles. The potential adverse effects of the <1% increase in vehicle traffic along PTH 16 over existing levels (i.e., 3,260 vehicles/day maximum annual average daily traffic, last recorded in 2012 [MTI and UMTIG 2024]) during construction are anticipated to be negligible, limited to the LAA, short-term in duration, multiple regular in frequency, and reversible upon decommissioning.

The existing electrical service is considered sufficient to supply the additional power demands of the proposed project. Other existing utility services on-site, including natural gas, wastewater treatment at the adjacent R3 Innovations treatment facility, and potable water from the Town of Neepawa are also sufficient for the proposed project. Waste generated from construction activities will be gathered and properly disposed of at a licenced landfill. Recycling of construction waste will be encouraged to the extent possible. Proper procedures for storage and handling of hazardous materials (i.e., fuels, chemicals) in designated areas will be adhered to.



The adverse effects on utility usage during operation are expected to be negligible, limited to the PS, long-term in duration, continuous in frequency, reversible upon decommissioning, and occurring within a disturbed context.

Overall, adverse effects of the project on infrastructure and services during construction are anticipated to be negligible, limited to the LAA, short-term in duration, multiple regular in frequency, reversible upon construction completion, and occurring within a disturbed context. During operation, adverse effects are anticipated to be negligible, limited to the PS, long-term in duration, continuous in frequency, reversible upon decommissioning, and occurring within a disturbed context.

3.1.4 Employment and Economy

A peak workforce of 35 - 40 construction staff is expected to be involved in project construction. Construction-related jobs will be short-term in nature with a 12-month construction phase expected to commence in fall 2025 (pending regulatory approval) and ending in summer 2026. The effect of this employment will be positive but negligible relative to the RAA. There is potential for the purchase/contract of local goods and services related to the project consistent with project size and scale.

The continued operation of the expanded plant will support the present positive effects related to employment of the workforce at the plant and its ongoing contribution to the local and regional economy (i.e., through the purchase of goods and services and tax generation). The proposed Butina line addition is anticipated to result in the addition of four operational full-time staff. Compared to the total HyLife Foods processing plant staffing of 1,652 personnel (Stantec 2022), this staffing increase accounts for a <1% increase and is considered negligible.

The potential residual effect on employment and economy is anticipated to be positive, negligible in magnitude, extending to the RAA, short-term during construction and long-term during operation, continuous in frequency, and would be reversible upon decommissioning.

3.1.5 Summary of Mitigation Measures

Proposed mitigation measures incorporated as part of this NOA include general mitigation measures that are typically applied in the course of project construction and operation. Mitigation measures to be employed to prevent or mitigate adverse effects identified in the sections above include the following:

- Stormwater will continue to be managed by surface ditching.
- Silt fences, erosion control measures, and potentially other industry accepted practices will be implemented to manage surface drainage flow, as necessary.
- Water will be redirected to existing on-site surface ditching with silt fencing (if required) to control sediment transport.
- An emergency response spill kit will be maintained and emergency response measures for spill clean-up and remediation will be implemented if necessary.



- Dust generation from exposed or disturbed areas will be kept to a minimum; additional dust suppression measures will be undertaken at the construction site as required (i.e. spraying material stockpiles and work areas with water).
- Excavated soil will be stockpiled separately on the plant site for future use in leveling activities.
- Material stockpiles will be placed in areas identified and approved by HyLife Foods; stockpile heights will be limited.
- Exhaust emissions from construction will be reduced through the proper maintenance of vehicles and equipment and restricting vehicle idling.
- Construction waste will be gathered and properly disposed of at a licensed landfill; recycling of construction waste will be encouraged to the extent possible.
- Construction activity will be limited to normal daylight working hours only in accordance with local municipal by-law provisions.
- Proper procedures for storage and handling of hazardous materials (i.e., fuels, chemicals) in designated areas will be adhered to.
- Contractors engaged in construction activities at the PS will adhere to a project-specific safety plan developed as appropriate and will adhere to applicable federal and provincial Health and Safety legislation.
- Site employees will be kept aware of safety requirements and on-site construction works to ensure worker safety.
- Traffic management procedures will continue to be adhered to; carpooling for employees will continue to be supported/encouraged.

3.2 Summary of Residual Effects Characterization

A summary of residual environmental effects characterization is found in Table 3.1. Residual effects related to air quality, greenhouse gas emissions, infrastructure and services, and employment and economy are characterized.



Table 3.1 Summary of Residual Environmental Effects

Project Effects	Project Phase	Residual Environmental Effects Characterization						
		Direction	Magnitude	Geographical Extent	Duration	Frequency	Reversibility	Ecological & Socio-economic Context
Air Quality	C/O	A	N	LAA	S	MI/C	R	D
Greenhouse Gas Emissions	C/O	A	N	RAA	L	MI/C	IR	D
Infrastructure and Services	C/O	A	N	LAA/ PS	S/L	MR/C	R	D
Employment and Economy	C/O	P	N	RAA	S/L	C	R	D

KEY

Direction

P Positive
 A Adverse
 N Neutral

Magnitude

N Negligible
 L Low
 M Moderate
 H High

Geographical Extent

PS Project Site
 LAA Local Assessment Area
 RAA Regional Assessment Area

Duration

S Short-term
 M Medium-term
 L Long-term

Frequency

S Single event
 MI Multiple irregular event
 MR Multiple regular event
 C Continuous

Reversibility

R Reversible
 IR Irreversible

Ecological/Socio-Economic Context:

U Undisturbed
 D Disturbed



3.3 Accidents and Malfunctions

The effects of accidents and malfunctions for the project are primarily related to the potential for mechanical equipment failure, fuel or other chemical spills, and transportation accidents. During construction and operation, there exists the potential for fires at the PS involving mechanical equipment and fuels, potential for environmental effects due to fuel and chemical spills and/or leaks from equipment, and transportation accidents that can result in the release of vehicle fluids to the environment (i.e., diesel, gasoline, oils, etc.) and the materials the vehicles were transporting. Accidents and malfunctions can potentially result in harm to on-site personnel, damage to equipment, the release of contaminants and hazardous materials from equipment/vehicles due to leaks or improper storage and handling and degradation of the environment and human health and safety.

Potential effects resulting from spills occurring in the construction phase is anticipated to be irregular and short-term in duration. The potential for an increase in vehicle traffic along PTH 16 over existing levels that could lead to transportation accidents is anticipated to be negligible. Operational traffic at the plant site operating at slow speeds and the utilization of qualified transport companies reduces the potential for on-site transportation accidents and risks. Measures to prevent adverse effects associated with fire/explosion, spills and transportation accidents are as follows:

- Flammable waste and materials will be removed on a regular basis and disposed of at an appropriate licensed disposal facility.
- Appropriate fire extinguishers are available on-site during operations and are maintained to manufacturer's standards.
- Potentially hazardous materials and chemicals are stored and handled at dedicated areas and labelled in accordance with applicable regulatory requirements.
- Refueling of construction vehicles and equipment will adhere to proper procedures and will use designated refueling areas or will be refueled off-site.
- Emergency spill kits will be maintained on-site and staff will be trained to properly deploy spill kit materials and clean-up spills.
- Inspections of hydraulic and fuel systems on equipment and machinery will be undertaken on a regular basis. Leaks detected will be repaired immediately by trained personnel.
- Existing traffic control measures (i.e., speed limits, signage) will be adhered to.
- HyLife Foods continues to maintain policies related to emergency preparedness, workplace hazardous materials information system (WHMIS) and spill response procedures.



4 Summary Conclusions

Stantec has prepared this environmental assessment report on behalf of HyLife Foods LP, in support of the NOA application for the proposed new Butina line addition. The NOA application is filed in accordance with Section 14(1) of *The Environment Act* which requires a proponent to notify the Director (for Class 1 and 2 developments) if the proponent intends to alter a licenced development (MECP 2022).

Potential interactions of the proposed project and the environment were evaluated with likely interactions examined to assess residual effects. Those interactions deemed to potentially generate adverse effects were described and evaluated with the assumption of typical mitigation measures representative of best practices and previous construction methods employed at the site.

On the basis of the desktop studies undertaken and information available to date as presented in this report, the proposed alteration is not expected to create significant adverse effects to the biophysical and socio-economic environment. It is anticipated that the proposed alteration at the plant, the addition of a new Butina line and building expansion at the plant site and its potential environmental effects, will be considered as a minor alteration to the licensed development.



5 References

5.1 Literature Cited

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Stantec Consulting Ltd. 2018a. HyLife Foods LP Processing Plant Notice of Alteration. Final Report. Prepared for HyLife Foods LP. February 20, 2018. Neepawa, MB.

Stantec Consulting Ltd. 2018b. R3 Innovations Inc. IWWTF Notice of Alteration. Final Report. Prepared for HyLife Foods LP and R3 Innovations Inc. February 20, 2018. Neepawa, MB.

Stantec Consulting Ltd. 2019a. HyLife Foods LP Processing Facility Notice of Alteration. Final Report. Prepared for HyLife Foods Ltd. Neepawa, MB.

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Stantec Consulting Ltd. 2022. HyLife Foods Plant Expansion Notice of Alteration. Final Report. Prepared for HyLife Foods Ltd. Neepawa, MB.

The Town of Neepawa. 2018. Town of Neepawa Zoning By-law No. 3184-18, Part 6 Zoning Map. Prepared for the Neepawa and Area Planning District by WSP. November 2018. Neepawa, MB.

5.2 Personal Communications

Stott, Sheldon. 2025. Director of Corporate Sustainability. Email correspondence.





Appendices





Appendix A

Figures



G:_GE_Projects_Eritha\111474734_HyLifeFoods_AerialMap\2025\111474734-LS_SitePlan_20250902.mxd - Reviewed: 2025-09-02 By: ACampigotto



- Legend**
-  Rural Municipality
 -  Industrial Heavy Zone
 -  HyLife Foods PDA (Approximate)



Project Location Prepared by ACampigotto on 2025-09-02
 Town of Neepawa, Reviewed by SBirkett on 2025-09-02
 Manitoba

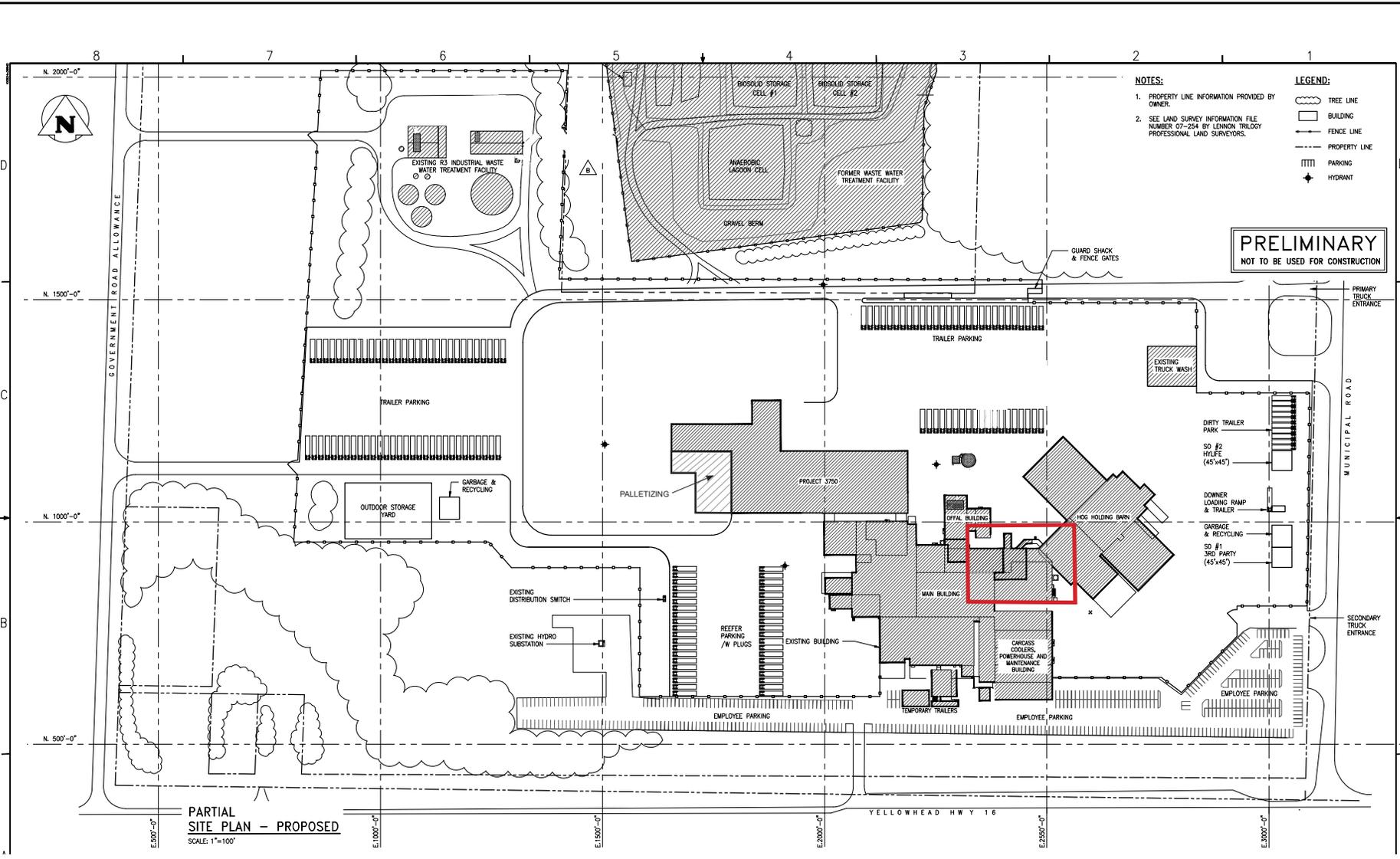
Client/Project 111474734
 HYLIFE FOODS LTD.
 HyLife Foods Butina Line Addition
 Notice of Alteration

Figure No.
 2

Title
 Site Plan

- Notes**
1. Coordinate System: NAD 1983 UTM Zone 14N
 2. Base Data Sources: Government of Manitoba.
 3. Aerial imagery Source: Microsoft product screenshot reprinted with permission from Microsoft Corporation.

Disclaimer: This document has been prepared based on information provided by others as cited in the Notes section. Stantec has not verified the accuracy and/or completeness of this information and shall not be responsible for any errors or omissions which may be incorporated herein as a result. Stantec assumes no responsibility for data supplied in electronic format, and the recipient accepts full responsibility for verifying the accuracy and completeness of the data.



- NOTES:**
1. PROPERTY LINE INFORMATION PROVIDED BY OWNER.
 2. SEE LAND SURVEY INFORMATION FILE NUMBER 07-254 BY LENOX TRIOLOGY PROFESSIONAL LAND SURVEYORS.
- LEGEND:**
- TREE LINE
 - BUILDING
 - FENCE LINE
 - PROPERTY LINE
 - PARKING
 - HYDRANT

PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION

PARTIAL SITE PLAN - PROPOSED
SCALE: 1"=100'

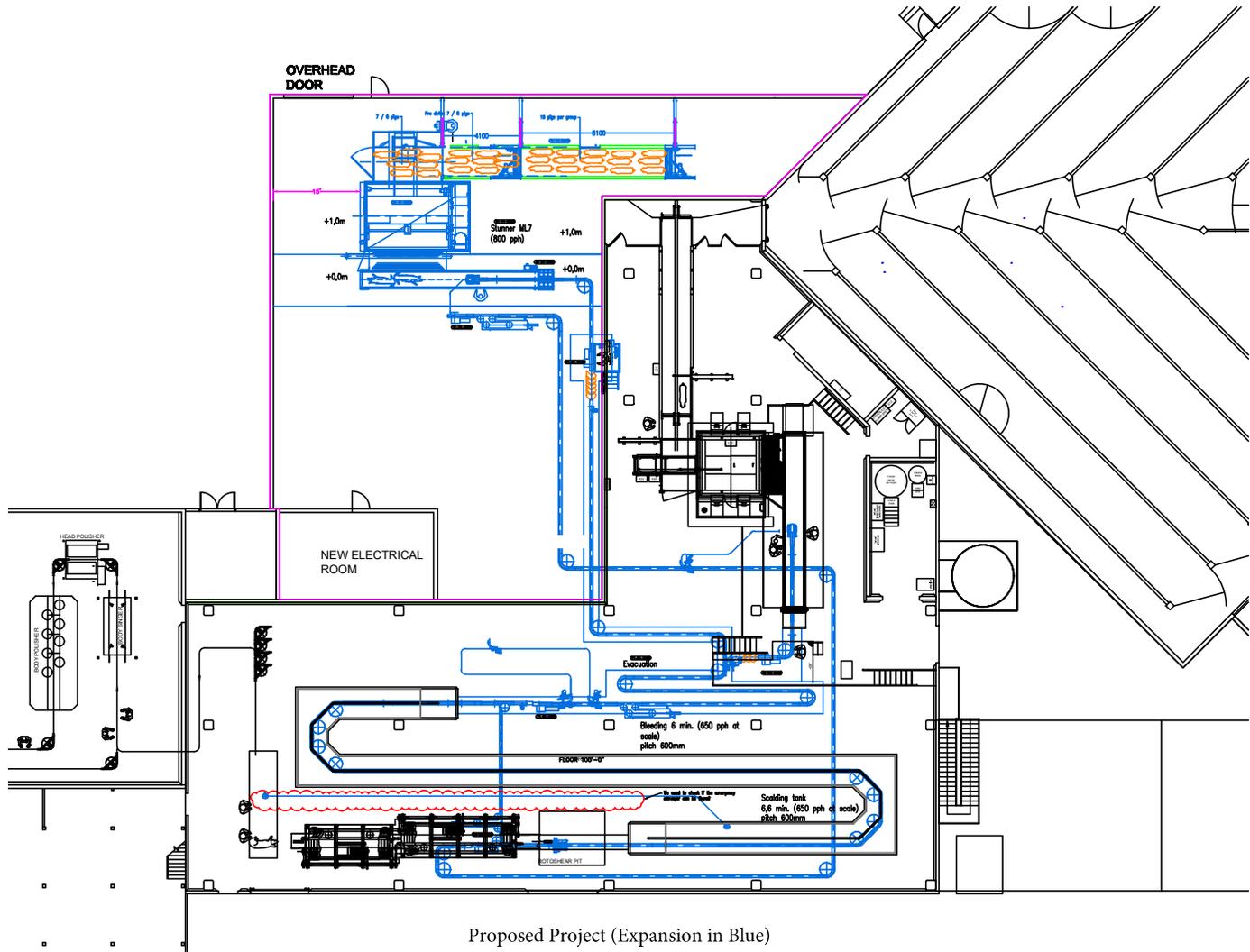
Legend
 Planned Area of Project Addition

Project Location 11144734
Town of Neepawa, Manitoba
Prepared by AC on 2025-09-02
Technical Review by SB on 2025-09-02

Client/Project
HYLIFE FOODS LTD.
HyLife Foods Butina Line Addition
Notice of Alteration



Figure No. 4
Title
HyLife Foods Processing Capacity Increase



Proposed Project (Expansion in Blue)

Project Location 111474740
 Town of Neepawa,
 Manitoba
 Prepared by AC on 2025-11-14
 Technical Review by SB on 2025-11-14

Client/Project
 HYLIFE FOODS LTD.
 HyLife Foods Butina Line Addition
 Notice of Alteration



Figure No.
 5
 Title
 HyLife Foods Butina Line Area
 Current State and Proposed Project



Appendix B

Environment Act Licence





Sustainable Development

Environmental Stewardship Division
Environmental Approvals Branch
1007 Century Street, Winnipeg, Manitoba R3H 0W4
T 204 945-8321 F 204-945-5229
www.gov.mb.ca/sd

CLIENT FILE NO: 2754.10

May 31, 2019

Carlie Pauls
HyLife Foods
Box 1000
623 Main Street
Neepawa, MB R3C 1A5

Dear Ms. Pauls:

Re: HyLife Foods LP (HyLife Foods) –Environment Act Licence No. 1102 RR – Notice of Alteration

Receipt of your May 3, 2019 submission is acknowledged as a notice of alteration in accordance with Section 14 of The Environment Act.

The requested change to the Development as Licensed is to increase the hog processing capacity at the plant from 7500 hogs/day to 8000 hogs/day to accommodate growing consumer demands.

Specifically, the request includes the increased delivery of hogs to the receiving facility of up to 2,500 hogs per week, changing variable cuts to take advantage of existing cut floor capacity infrastructure and increase operating staff by approximately 99 employees over two shifts to accommodate the increase in processing.

The increase in wastewater production as a result of the increase in hog processing will be accommodated by alterations at the R3 Innovations Industrial Wastewater Treatment Facility operating in accordance with Environment Act Licence No. 2870 RR.

The potential environmental effect of the requested changes to the Development as Licensed is insignificant and considered to be a minor alteration in accordance with Section 14(2) of The Environment Act. Approval is hereby granted for the alteration to the Development as described in the May 3, 2019 submission and in accordance with revised Environment Act Licence No. 1102 RRR (attached).

If you have any questions, please contact Jennifer Winsor, P.Eng. at 204-945-7012.

Yours truly,



Cordella Friesen
Director
The Environment Act

c. Scott Davies, A/Director - Environmental Compliance and Enforcement
Peter Crocker – Environmental Compliance and Enforcement
Public Registry

LICENCE

Licence No. / Licence n°	<u>1102 RRR</u>
Issue Date / Date de délivrance	<u>March 24, 2017</u>
Revised / Révisé	<u>May 31, 2019</u>

In accordance with *The Environment Act* (C.C.S.M. c. E125) /
Conformément à la *Loi sur l'environnement* (C.P.L.M. c. E125)

Pursuant to Section 11(1) and 14(2) / Conformément au Paragraphe 11(1) et 14(2)

THIS LICENCE IS ISSUED TO: / CETTE LICENCE EST DONNÉE À:

HYLIFE FOODS LP;
"the Licencee"

for the operation of the Development being a hog processing plant located in SW 35-14-15WPM in the Town of Neepawa with all wastewater being discharged to the R3 Innovations Inc. & Town of Neepawa industrial wastewater treatment facility (IWWTF) for treatment and in accordance with the Proposal filed under The Environment Act on June 12, 2013 and additional information provided on November 25, 2013 and notices of alteration submitted on May 22, 2015, May 18, 2016, February 8, 2017 and May 3, 2019 and subject to the following specifications, limits, terms and conditions:

DEFINITIONS

In this Licence,

"**accredited laboratory**" means an analytical facility accredited by the Standards Council of Canada (SCC), or accredited by another accrediting agency recognized by Manitoba Sustainable Development to be equivalent to the SCC, or be able to demonstrate, upon request, that it has the quality assurance/quality control (QA/QC) procedures in place equivalent to accreditation based on the international standard ISO/IEC 17025, or otherwise approved by the Director;

"**affected area**" means a geographical area, excluding the property of the Development;

"**approved**" means approved by the Director or assigned Environment Officer in writing;

"ASTM" means the American Society for Testing and Materials;

"day" or "daily" means any 24-hour period;

"Director" means an employee so designated pursuant to The Environment Act;

"dissolved air floatation (DAF) system" means an aeration component in an industrial wastewater pre-treatment system;

"effluent" means wastewater flowing or pumped out of the hog processing plant;

"Environment Officer" means an employee so designated pursuant to The Environment Act;

"Environmental Management System (EMS)" means the part of the overall management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes, and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy;

"hog processing" means the slaughtering, bleeding, scalding, de-hairing, pasteurization, splitting, eviscerating, cutting or packaging of hogs, the processing or rendering of edible materials, or any combination of these activities;

"hog processing plant" means the main hog processing plant structure;

"Industrial Services Agreement" means a signed and legally binding agreement, arrived at between R3 Innovations Inc. and the Town of Neepawa and the Licencee which outlines clear limits respecting the maximum daily and maximum weekly flow rates, as well as maximum daily and maximum weekly loading limits on such physical, chemical and biological parameters as may be requested of the Licencee by R3 Innovations Inc. and the Town of Neepawa;

"industrial wastewater" means wastewater derived from an industry which manufactures, handles or processes a product and does not include wastewater from commercial and residential buildings;

"IWWTF" means the Industrial Wastewater Treatment Facility owned by the Town of Neepawa and R3 Innovations Inc. and operating under Environment Act Licence No. 2870 RR or subsequent revised licence;

"mg/L" means milligrams per litre;

"noise nuisance" means an unwanted sound, in an affected area, which is annoying, troublesome, or disagreeable to a person:

- a) residing in an affected area;
- b) working in an affected area; or

- c) present at a location in an affected area which is normally open to members of the public;
- if the unwanted sound
- d) is the subject of at least 5 written complaints, received by the Director in a form satisfactory to the Director and within a 90-day period, from 5 different persons falling within clauses (a), (b) or (c), who do not live in the same household; or
 - e) is the subject of at least one written complaint, received by the Director in a form satisfactory to the Director, from a person falling within clauses (a), (b) or (c) and the Director is of the opinion that if the unwanted sound had occurred in a more densely populated area there would have been at least 5 written complaints received within a 90-day period, from 5 different persons who do not live in the same household;

"odour nuisance" means a continuous or repeated odour, smell or aroma, in an affected area, which is offensive, obnoxious, troublesome, annoying, unpleasant or disagreeable to a person:

- a) residing in an affected area;
 - b) working in an affected area; or
 - c) present at a location in an affected area which is normally open to members of the public;
- if the odour, smell or aroma
- d) is the subject of at least 5 written complaints, received by the Director in a form satisfactory to the Director and within a 90-day period, from 5 different persons falling within clauses (a), (b) or (c), who do not live in the same household; or
 - e) is the subject of at least one written complaint, received by the Director in a form satisfactory to the Director, from a person falling within clauses (a), (b) or (c) and the Director is of the opinion that if the odour, smell or aroma had occurred in a more densely populated area there would have been at least 5 written complaints received within a 90-day period, from 5 different persons who do not live in the same household;

"process wastewater" means a liquid stream, containing or comprised of process water or any chemicals used by the Development, which is designated for release into the environment;

"pollutant" means a pollutant as defined in The Environment Act;

"record drawings" means engineering drawings complete with all dimensions which indicate all features of the Development as it has actually been built;

"SDS" means safety data sheets;

"sewage" means household and commercial wastewater that contains human waste;

"**solid waste**" means solid waste as defined in Manitoba Regulation 37/2016, or any future amendments thereto, respecting waste disposal grounds, excluding waste rock;

"**Standard Methods for the Examination of Water and Wastewater**" means the most recent edition of Standard Methods for the Examination of Water and Wastewater published jointly by the American Public Health Association, the American Waterworks Association and the Water Environment Federation;

"**waste disposal ground**" means an area of land designated by a person, municipality, provincial government agency, or crown corporation for the disposal of waste and approved for use in accordance with Manitoba Regulation 37/2016, or any future amendments thereto, or a Licence pursuant to The Environment Act;

"**wastewater**" means the spent or used water of a community or industry which contains dissolved and suspended matter;

"**wastewater collection system**" means the sewer and pumping system used for the collection and conveyance of domestic, commercial, industrial and process wastewater; and

"**WHMIS**" means Workplace Hazardous Materials Information System.

GENERAL TERMS AND CONDITIONS

This Section of the Licence contains requirements intended to provide guidance to the Licencee in implementing practices to ensure that the environment is maintained in such a manner as to sustain a high quality of life, including social and economic development, recreation and leisure for present and future Manitobans.

Retain Copy of Licence

1. The Licencee shall at all times maintain a copy of this licence at the Development or at the premises from which the Development's operations are managed.

Future Sampling

2. In addition to any of the limits, terms and conditions specified in this Licence, the Licencee shall, upon the request of the Director:
 - a) sample, monitor, analyze and/or investigate specific areas of concern regarding any segment, component or aspect of pollutant storage, containment, treatment, handling, disposal or emission systems, for such pollutants or ambient quality, aquatic toxicity, leachate characteristics and discharge or emission rates, for such duration and at such frequencies as may be specified;
 - b) determine the environmental impact associated with the release of any pollutant(s) from the Development; or
 - c) conduct specific investigations in response to the data gathered during environmental monitoring programs.

Reporting Format

3. The Licencee shall submit all information required to be provided to the Director or Environment Officer under this Licence, in written and electronic format, in such form (including number of copies) and of such content as may be required by the Director or Environment Officer, and each submission shall be clearly labelled with the Licence Number and Client File Number associated with this Licence.

Equipment Breakdown

4. The Licencee shall, in the case of physical or mechanical equipment breakdown or process upset where such breakdown or process upset results or may result in the release of a pollutant in an amount or concentration, or at a level or rate of release, that causes or may cause a significant adverse effect, immediately report the event by calling the 24-hour environmental accident reporting line at 204-944-4888 (toll-free 1-855-944-4888). The report shall indicate the nature of the event, the time and estimated duration of the event and the reason for the event.
5. The Licencee shall, following the reporting of an event pursuant to Clause 4,
 - a) identify the repairs required to the mechanical equipment;
 - b) undertake all repairs to minimize unauthorized discharges of a pollutant;
 - c) complete the repairs in accordance with any written instructions of the Director; and
 - d) submit a report to the Director about the causes of breakdown and measures taken, within one week of the repairs being done.

Safety and Security

6. The Licencee shall continually maintain an up-to-date inventory of any process and cleaning chemicals used and/or stored on-site that would be captured by any applicable federal/provincial WHMIS regulations and protocols, and make this information and applicable MSDS sheets available to an Environment Officer upon request.
7. The Licencee shall prepare, within 90 days of the date of issuance of this Licence, and maintain an emergency response contingency plan in accordance with the Canadian Centre for Occupational Health and Safety "Emergency Response Planning Guide" or other emergency planning guidelines acceptable to the Director.
8. The Licencee shall, at all times during the operation of the Development, implement a high standard of equipment maintenance and operational practices.
9. The Licencee shall implement and continually maintain in current status, an Environmental Management System (EMS) for the Development which is acceptable to the Director.

Environmental Coordinator

10. The Licencee shall designate an employee, within 60 days of the date of issuance of this Licence, as the Licencee's Environmental Coordinator, whose job description will include assisting the Licencee in complying with the limits, terms and conditions in this Licence and assisting Senior Management of the Licencee to manage environmental issues at the Development. The name of the Environmental Coordinator shall be submitted in writing to the Director within 14 days of appointment and any subsequent appointment.

Industrial Services Agreement

11. The Licencee shall:
 - a) prepare and execute a current comprehensive and enforceable Industrial Services Agreement to be legally entered into with R3 Innovations Inc. and the Town of Neepawa, which is acceptable to the Director, for the purposes of defining maximum daily and maximum weekly influent limits respecting volume and pollutant loading rates which would protect the operational integrity of the IWWTF in terms of the design capability and/or in consideration of the actual performance of the IWWTF relative to the effluent quality limits as specified in Environment Act Licence No. 2870 RR, or any revision thereof;
 - b) provide the Director with a copy of the Industrial Services Agreement upon being signed by all parties; and
 - c) provide the Director with a copy of any future revised Industrial Services Agreement.

SPECIFICATIONS, LIMITS, TERMS AND CONDITIONS

Respecting Construction

12. The Licencee shall notify the designated Environment Officer not less than two weeks prior to beginning construction of the Development. The notification shall include the intended starting date of construction and the name of the contractor responsible for the construction.
13. The Licencee shall obtain all necessary federal, provincial and/or municipal licences, authorizations, permits and/or approvals for construction of relevant components of the Development prior to commencement of construction.
14. The Licencee shall locate fuel storage and equipment servicing areas established for the construction and operation of the Development a minimum distance of 100 metres from any waterbody, and shall comply with the requirements of Manitoba Regulation 188/2001 respecting Storage and Handling of Petroleum Products and Allied Products or any future amendment thereof.
15. The Licencee shall, during construction of the Development, operate, maintain and store all materials and equipment in a manner that prevents any deleterious substances (fuel,

oil, grease, hydraulic fluids, coolant, paint, uncured concrete and concrete wash water, etc.) from entering watercourses, and have an emergency spill kit for in-water use available on site during construction.

Respecting the Operation of the Development

16. The Licencee shall limit the rate of hog processing at the Development to no more than 40,000 hogs per week averaged over any 12 month period.
17. The Licencee shall direct all delivered, live and unloaded hogs as soon as possible into the hog receiving facility and not exceed the storage of 7,500 hogs at any time.
18. The Licencee shall remove all offal, bones, dead-on-arrival animals and solids regularly from the Development to a third party rendering facility, approved by the Director, which is licensed under The Environment Act.
19. The Licencee shall not direct pollutants into any surface drainage route leading off the property of the Development or into the local groundwater.
20. The Licencee shall actively participate in any future watershed based management study, plan or nutrient reduction program, approved by the Director.

Respecting Air Emissions

21. The Licencee shall not cause or permit an odour nuisance to be created as a result of the construction, operation or alteration of the Development, and shall take such steps as the Director may require to eliminate or mitigate an odour nuisance.
22. The Licencee shall not cause or permit a noise nuisance to be created as a result of the construction, operation or alteration of the Development, and shall take such steps as the Director may specify to eliminate or mitigate a noise nuisance.

Respecting Blood Collection

23. The Licencee shall minimize the loss of blood to the process wastewater sewers by maximizing the efficiency of the blood collection to the satisfaction of the Director.
24. The Licencee shall dispose of the blood collected at the Development by having the blood hauled to a facility specializing in blood collection as approved by the Director, using vehicles utilizing containment provisions satisfactory to the Director.

Respecting Solid Wastes

25. The Licencee shall not undertake any on-site burning of solid waste.
26. The Licencee shall minimize the generation of domestic solid waste and maximize, wherever possible, the collection and recycling of recyclable wastes generated through the operation of the Development.

27. The Licencee shall:
- a) collect, store and land apply all dry hog manure and bedding from the unloading docks, truck trailers and holding pens in accordance with the Livestock Manure and Mortalities Management Regulation MR 42/98 or any future amendment thereof; and
 - b) direct all of the hog manure collected inside the hog processing plant, or washed off the floor of the hog holding pens, or washed out of the transporting truck trailers, to the process wastewater sewers, unless otherwise approved by the Director.
28. The Licencee shall dispose of all solid waste generated at the Development, which is not recycled, only to a waste disposal ground operating under the authority of a permit issued pursuant to Manitoba Regulation 37/2016 respecting Waste Management Facilities or any future amendment thereof, or a Licence issued pursuant to The Environment Act.

Respecting Dangerous Goods or Hazardous Waste

29. The Licencee shall not release dangerous goods or hazardous wastes into the wastewater collection system.
30. The Licencee shall comply with all the applicable requirements of:
- a) The Manitoba Dangerous Goods Handling and Transportation Act, and regulations issued thereunder, respecting the handling, transport, storage and disposal of any dangerous goods brought onto or generated at the Development; and
 - b) Manitoba Storage and Handling of Petroleum Products and Allied Products Regulation 188/2001, or any future amendments thereto.
31. The Licencee shall collect, transport and store used oil or hydraulic fluids removed from on-site machinery in secure, properly labeled, non-leaking containers and shall regularly send them to a recycling or disposal facility approved to accept hazardous wastes.
32. The Licencee shall install and maintain spill recovery equipment at the Development at all times.

Respecting Process Wastewater

33. The Licencee shall operate and maintain the screening and DAF unit to pre-treat all process wastewater prior to discharging to the IWWTF.
34. The Licencee shall direct all solids from the DAF unit to an off-site rendering facility that is licensed under The Environment Act or under the appropriate legislation of another corresponding jurisdiction.
35. The Licencee shall not release any process wastewater or sanitary wastewater from the Development except through the wastewater collection system to the industrial wastewater treatment facility (IWWTF).

MONITORING AND REPORTING

Respecting Monitoring

36. The Licencee shall:
- a) monitor, determine and record the number of hogs processed by the end of each week;
 - b) monitor, determine and record the total weekly quantity (cubic meters) of raw water used by the Development; and
 - c) maintain the recorded information in a monthly report and make the report available to the Environment Officer upon request.

Record Drawings

37. The Licencee shall:
- a) prepare "record drawings" for the Development and shall label the drawings "Record Drawings"; and
 - b) provide to the Director, within six months from the date of this Environment Act Licence, two electronic copies of the "record drawings".

REVIEW AND REVOCATION

- A. This Licence replaces Environment Act Licence No. 1102 RR which is hereby rescinded.
- B. If, in the opinion of the Director, the Licencee has exceeded or is exceeding or has or is failing to meet the specifications, limits, terms, or conditions set out in this Licence, the Director may, temporarily or permanently, revoke this Licence.
- C. If, in the opinion of the Director, new evidence warrants a change in the specifications, limits, terms or conditions of this Licence, the Director may require the filing of a new proposal pursuant to Section 11 of The Environment Act.



Cordella Friesen
Director
The Environment Act



Appendix C

Certificates of Title



STATUS OF TITLE

Title Number **3299179/5**
Title Status **Accepted**
Client File MISC



1. REGISTERED OWNERS, TENANCY AND LAND DESCRIPTION

HYLIFE FOODS INC.

IS REGISTERED OWNER SUBJECT TO SUCH ENTRIES RECORDED HEREON IN THE FOLLOWING DESCRIBED LAND:

SP LOT 5 PLAN 7402 NLTO
IN SW 1/4 35-14-15 WPM

The land in this title is, unless the contrary is expressly declared, deemed to be subject to the reservations and restrictions set out in section 58 of *The Real Property Act*.

2. ACTIVE INSTRUMENTS

Instrument Type: **Caveat**
Registration Number: **83-4840/5**
Instrument Status: **Accepted**

Registration Date: 1983-06-29
From/By: MANITOBA TELEPHONE SYSTEM
To:

Amount:
Notes: AFF: ELY 40' PERP
Description: No description

Instrument Type: **Caveat**
Registration Number: **85-3176/5**
Instrument Status: **Accepted**

Registration Date: 1985-05-27
From/By: MANITOBA TELEPHONE SYSTEM
To:

Amount:
Notes: AFF: PART
Description: No description

Instrument Type: **Caveat**
Registration Number: **86-1191/5**
Instrument Status: **Accepted**

Registration Date: 1986-03-21
From/By: THE TOWN OF NEEPAWA
To:

Amount:
Notes: No notes
Description: No description

Instrument Type: **Caveat**
Registration Number: **86-2833/5**
Instrument Status: **Accepted**

Registration Date: 1986-06-24
From/By: THE RM OF LANGFORD
To:

Amount:
Notes: No notes
Description: No description

Instrument Type: **Caveat**
Registration Number: **86-5122/5**
Instrument Status: **Accepted**

Registration Date: 1986-11-14
From/By: MANITOBA HYDRO-ELECTRIC BOARD
To:

Amount:
Notes: No notes
Description: No description

Instrument Type:	Caveat
Registration Number:	1017447/5
Instrument Status:	Accepted
Registration Date:	2001-08-23
From/By:	MTS COMMUNICATIONS INC.
To:	
Amount:	
Notes:	AFF: SLY 20M PERP
Description:	EASEMENT AGREEMENT
<hr/>	
Instrument Type:	Mortgage
Registration Number:	1165389/5
Instrument Status:	Accepted
Registration Date:	2024-07-24
From/By:	Freezerco Inc., Hylife Ltd., et al
To:	Royal Bank Of Canada
Amount:	\$1,000,000,000.00
Notes:	No notes
Description:	Debenture. Includes land in WLTO, BLTO, PLTO & MLTO
3. ADDRESSES FOR SERVICE	
HYLIFE FOODS INC. 30 Market Blvd. Steinbach MB R5G 2X9	
4. TITLE NOTES	
MORTGAGE 1063384/5 IS SECURITY FOR THE SAME INDEBTEDNESS THAT IS ALSO SECURED BY MORTGAGES 1450837/2, 5110660/1, 4994629/1, 1214700/2, 1063385/5, 3770271/1, 3565848/1 AND 1214702/2	
5. LAND TITLES DISTRICT	
Neepawa	
6. DUPLICATE TITLE INFORMATION	
Duplicate not produced	
7. FROM TITLE NUMBERS	
2522732/5 All	

8. REAL PROPERTY APPLICATION / CROWN GRANT NUMBERS	
No real property application or grant information	
9. ORIGINATING INSTRUMENTS	
Instrument Type:	Request To Issue Title
Registration Number:	1164379/5
Registration Date:	2024-05-15
From/By:	HYLIFE FOODS INC.
To:	
Amount:	
10. LAND INDEX	
Lot 5 Plan 7402 IN SW 35-14-15W	

CERTIFIED TRUE EXTRACT PRODUCED FROM THE LAND TITLES DATA STORAGE SYSTEM OF TITLE NUMBER 3299179/5

STATUS OF TITLE

Title Number **3299180/5**
Title Status **Accepted**
Client File MISC



1. REGISTERED OWNERS, TENANCY AND LAND DESCRIPTION

HYLIFE FOODS INC.

IS REGISTERED OWNER SUBJECT TO SUCH ENTRIES RECORDED HEREON IN THE FOLLOWING DESCRIBED LAND:

THE SW 1/4 OF SECTION 35-14-15 WPM
EXC FIRSTLY: SP PLAN 7402 NLTO
SECONDLY: PLANS 23208 AND 48468 NLTO
AND THIRDLY: ROAD PLAN 4611 NLTO

The land in this title is, unless the contrary is expressly declared, deemed to be subject to the reservations and restrictions set out in section 58 of *The Real Property Act*.

2. ACTIVE INSTRUMENTS

Instrument Type: **Caveat**
Registration Number: **30550/5**
Instrument Status: **Accepted**

Registration Date: 1952-08-01
From/By: CROWN TRUST COMPANY
To:

Amount:
Notes: No notes
Description: No description

Instrument Type: **Caveat**
Registration Number: **83-4838/5**
Instrument Status: **Accepted**

Registration Date: 1983-06-29
From/By: MANITOBA TELEPHONE SYSTEM
To:

Amount:
Notes: AFF: PART
Description: No description

Instrument Type: **Caveat**
Registration Number: **85-3172/5**
Instrument Status: **Accepted**

Registration Date: 1985-05-27
From/By: MANITOBA TELEPHONE SYSTEM
To:

Amount:
Notes: AFF: PART
Description: No description

Instrument Type: **Caveat**
Registration Number: **86-1191/5**
Instrument Status: **Accepted**

Registration Date: 1986-03-21
From/By: THE TOWN OF NEEPAWA
To:

Amount:
Notes: No notes
Description: No description

Instrument Type: **Caveat**
Registration Number: **86-2833/5**
Instrument Status: **Accepted**

Registration Date: 1986-06-24
From/By: THE RM OF LANGFORD
To:

Amount:
Notes: No notes
Description: No description

Instrument Type: **Caveat**
Registration Number: **86-5122/5**
Instrument Status: **Accepted**

Registration Date: 1986-11-14
From/By: MANITOBA HYDRO-ELECTRIC BOARD
To:

Amount:
Notes: No notes
Description: No description

Instrument Type: **Caveat**
Registration Number: **1017447/5**
Instrument Status: **Accepted**

Registration Date: 2001-08-23
From/By: MTS COMMUNICATIONS INC.
To:

Amount:
Notes: AFF: PART
Description: EASEMENT AGREEMENT

Instrument Type: **Easement**
Registration Number: **1106610/5**
Instrument Status: **Accepted**

Registration Date: 2014-04-30
From/By: HYLIFE FOODS INC.
To: THE MANITOBA HYDRO-ELECTRIC BOARD

Amount:
Notes: AFF: PART IN PLAN 55707
Description: No description

Instrument Type: **Caveat**
Registration Number: **1138280/5**
Instrument Status: **Accepted**

Registration Date: 2019-05-17
From/By: HYLIFE FOODS INC.
To:

Amount:
Notes: Dominant Land
Description: Easement (including Rights-of-Way)

Instrument Type: **Caveat**
Registration Number: **1139810/5**
Instrument Status: **Accepted**

Registration Date: 2019-08-22
From/By: HYLIFE FOODS INC.
To:

Amount:
Notes: Dominant Land
Description: Easement (including Rights-of-Way)

Instrument Type: **Mortgage**
Registration Number: **1165389/5**
Instrument Status: **Accepted**

Registration Date: 2024-07-24
From/By: Freezerco Inc., Hylife Ltd., et al
To: Royal Bank Of Canada

Amount: \$1,000,000,000.00
Notes: No notes
Description: Debenture. Includes land in WLTO, BLTO, PLTO & MLTO

3. ADDRESSES FOR SERVICE

HYLIFE FOODS INC.
30 Market Blvd.
Steinbach MB
R5G 2X9

4. TITLE NOTES

MORTGAGE 1063384/5 IS SECURITY FOR THE SAME INDEBTEDNESS

<p>THAT IS ALSO SECURED BY MORTGAGES 1450837/2, 5110660/1, 4994629/1, 1214700/2, 1063385/5, 3770271/1, 3565848/1 AND 1214702/2</p>	
5. LAND TITLES DISTRICT	Neepawa
6. DUPLICATE TITLE INFORMATION	Duplicate not produced
7. FROM TITLE NUMBERS	2522733/5 All
8. REAL PROPERTY APPLICATION / CROWN GRANT NUMBERS	No real property application or grant information
9. ORIGINATING INSTRUMENTS	<p>Instrument Type: Request To Issue Title Registration Number: 1164379/5</p> <p>Registration Date: 2024-05-15 From/By: HYLIFE FOODS INC. To: Amount:</p>
10. LAND INDEX	<p>SW 35-14-15W EX SP 7402 EX PL'S 23208 & 48468 EX RD PL 4611</p>

CERTIFIED TRUE EXTRACT PRODUCED FROM THE LAND TITLES DATA STORAGE SYSTEM OF TITLE NUMBER 3299180/5