

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Nutrien Ag Solutions (Canada) Inc.
PROPOSAL NAME: Nutrien Ag Solutions (Canada) Inc. – Ninga Bulk Material Handling Facility
CLASS OF DEVELOPMENT: 1
TYPE OF DEVELOPMENT: Bulk Material Handling Facility
CLIENT FILE NO.: 3499.10

As part of the [environmental assessment and licensing process](#), the purpose of this document is to summarize comments received from the public and government's Technical Advisory Committee (TAC), and how they are addressed. It includes a recommendation to inform the director's licensing decision.

INTRODUCTION

On June 3, 2025, Nutrien Ag Solutions (Canada) Inc. submitted a Notice of Alteration, followed by additional information on June 19, 2025. The proposed alteration involves relocating dry fertilizer operations from two existing sites: one in Gladstone and another in Ninga, to an existing Nutrien facility located at SE 06-03-18 WPM in the Municipality of Killarney-Turtle Mountain.

Upon review of the proposed alteration and other relevant information, it was determined that the proposed changes could result in significant environment impacts per Section 14(3) of The Environment Act. As a result, an Environment Act Proposal was requested on July 9, 2025, and submitted on July 10, 2025.

The proposal was advertised in the Killarney Guide and Neepawa Banner-Press on August 22, 2025. It was placed in the online Public Registry as follows:
<https://www.gov.mb.ca/sd/eal/registries/3499.1/index.html>.

The proposal was distributed to Technical Advisory Committee (TAC) members on July 24, 2025.

The deadline for public comments was September 5, 2025. TAC members were initially asked to submit comments by August 26, 2025, but their deadline was later extended to September 10, 2025.

COMMENTS FROM THE PUBLIC

The department did not receive any public comments on the proposal during the comment period.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE

Technical Advisory Committee (TAC) responses are listed in Table 1 below. Substantive comments and their dispositions follow the table. TAC comments are provided in full in the public registries at <https://www.gov.mb.ca/sd/eal/registries/3499.1/index.html>.

Table 1 Nutrien Ag Solutions (Canada) Inc. – Ninga Bulk Material Handling Facility
Technical Advisory Committee Comments

| No | Technical Advisory Committee Member | Response |
|-----------|---|--------------------|
| 1 | Environment and Climate Change | |
| | Environmental Approvals Branch | |
| | • Air Quality Management | No response |
| | Environmental Compliance and Enforcement Branch | |
| | • Regional Office | July 25, 2025 |
| | Drainage and Water Rights Licensing Branch | |
| | • Water Use Licensing Section | No concerns |
| | • Drainage and Water Rights Licensing Section | August 13, 2025 |
| | Water Science and Watershed Management Branch | |
| | • Groundwater Management Section | September 10, 2025 |
| | Climate and Green Plan Implementation Office | No response |
| | Parks Branch | No concerns |
| | Aquatic Invasive Species | No concerns |
| 2 | Natural Resources and Indigenous Futures | |
| | Wildlife Branch | No concerns |
| | Fisheries Branch | No response |
| | Forestry and Peatlands Branch | No concerns |
| | Lands and Planning | No concerns |
| | Crown Land Specialist | |
| 3 | Business, Mining, Trade and Job Creation | |
| | Mines | No concerns |
| | Petroleum | No response |
| 4 | Sport, Culture, Heritage and Tourism - Historic Resources Branch | No concerns |
| 5 | Municipal and Northern Relations | |
| | Community Planning Branch - Brandon | July 28, 2025 |
| | Office of the Fire Commissioner | No comments |
| 6 | Labour and Immigration - Inspection and Technical Services | No comments |
| 7 | Transportation and Infrastructure | |
| | • Transportation Operations Division (Highway Regional Operations) | August 1, 2025 |

| | | |
|---|--|----------------|
| | <ul style="list-style-type: none"> • Highway Design | August 7, 2025 |
| | <ul style="list-style-type: none"> • Hydrologic Forecasting & Water Management Branch | July 28, 2025 |
| | <ul style="list-style-type: none"> • Environmental Services Branch | No concerns |
| 8 | Health, Seniors and Long-Term Care - Prairie Mountain Health | No concerns |

Environment and Climate Change - Environmental Compliance and Enforcement Branch

The Environmental Compliance and Enforcement Branch noted the following:

- The branch has no concerns as long as the new fertilizer area meets the Environment Act requirements for these types of facilities; i.e. concrete underlying loading and blending areas, etc.
- The swale or run off area in the facility looks like it may drain directly into the municipal ditch. They are asking the proponent to confirm that a control structure or gate is available in the case of a large spill.

Disposition:

These comments were shared to the proponent on July 28, 2025. The proponent indicated on the same day that the fertilizer plant will be built in concrete, with concrete under all bins and loading areas. The proponent also confirmed that in the event of a major spill, secondary containment is in place around the AWSA shed. Additionally, the proponent indicated that the site has a containment berm along the north side that serves to collect any spilled or released material. They also added that if the volume of material exceeds the berm’s capacity and begins to flow toward the northeast corner, following the natural swale, the equipment is available on site to move earth and construct a temporary barrier, which will prevent any foreign material from entering nearby waterways. Environmental Compliance and Enforcement Branch reviewed the additional information on August 7, 2025, and did not have any other concerns.

Environment and Climate Change - Drainage and Water Rights Licensing Branch, Drainage and Water Rights Licensing Section

The Drainage and Water Rights Licensing Section noted that new water control works are being proposed and indicated that they will require the proponent to obtain authorization under the Water Rights Act.

Disposition:

This comment was shared with the proponent on August 13, 2025. Drainage and Water Rights Licensing Section indicated on September 15, 2025, that they have been in contact with the proponent and that the proponent has addressed their concern.

Environment and Climate Change - Water Science and Watershed Management Branch, Groundwater Management Section

The Groundwater Management Section noted the following:

- The proponent’s emergency plan focused on surface containment measures and does not explicitly address the risk to shallow groundwater or provide mitigation strategy for possible infiltration to saturated sand/silt units identified in the test holes.
- The proponent should conduct additional site investigations, such as more test holes, installation of piezometers, and groundwater sampling to better delineate shallow groundwater pathways and assess risk to aquifers.

- It is recommended that shallow monitoring wells be installed, screened in the perched or saturated sand/silt units, and, if feasible, in the deeper sand/gravel aquifers if present. Perform baseline and periodic water quality monitoring for nitrate, ammonia, chloride or hydrocarbons.
- Update emergency response plan to include specific actions for spills that could affect shallow groundwater (e.g. rapid excavation, absorbents, groundwater authority notification). Incorporate groundwater risk assessment into emergency planning. Include monitoring and contingency measures for subsurface contamination.
- Compile a local well inventory and establish notification protocol for nearby well owners in case of a significant spill. The request can be submitted to groundwater@gov.mb.ca.

Disposition:

These comments were shared with the proponent and additional information was requested on September 11, 2025, to address these comments. The information received was shared with the TAC member. Groundwater Management Section are satisfied with the response.

- Clause 10 of the draft licence addresses the emergency plan specific requirements that Groundwater Management Section recommended.
- Clauses 51 – 57 of the draft licence address the requirements for additional site investigation, more test holes, groundwater monitoring, initial sample reading/testing and local well inventory.

Sport, Culture, Heritage and Tourism - Historic Resources Branch

The Historic Resources Branch noted that under Section 46 and 51 of the Heritage Resources Act (the Act), if at any time, heritage resources are encountered in association with these lands during testing and development, there is an obligation to report any heritage resources and a prohibition on destruction, damage or alteration of said resources. HRB may require that an acceptable heritage resource management strategy be implemented by the proponent/developer to mitigate the effects of their activity on the heritage resources.

Disposition:

These comments were shared with the proponent for their information on August 15, 2025.

Municipal and Northern Relations, Community Planning Branch - Brandon

Community Planning Branch – Brandon recommended the following:

- The proponent obtains a Conditional Use for the facility and any other permits from the Killarney-Turtle Mountain Municipality to ensure compliance with the Zoning By-law.
- Additionally, the proponent must ensure that the underground water is protected from any potential pollution risks associated with the activity.

Disposition:

These comments were shared with the proponent for their information and additional information was requested on August 14, 2025. A copy of the Conditional Use permit was submitted on November 7, 2025.

Manitoba Transportation and Infrastructure - Hydrologic Forecasting & Water Management Branch

The Hydrologic Forecasting & Water Management Branch noted the following:

- Provided the transport route and installation of the bins adhere to the site map drawing, they have no concern.

- Because a small portion of the site at the west end is quite close to a creek, which may be susceptible to flooding/erosion, they recommended that no activity for this operation/installation take place within a setback distance of 30m from the top of bank.

Disposition:

These comments and resources were shared with the proponent on August 14, 2025.

Manitoba Transportation and Infrastructure, Transportation Operations Division and Highway Design

Highway Design Division noted that:

- They are concerned that traffic generated by this development may have an impact on the traffic operations of Provincial Trunk Highway (PTH) 3 and on Provincial Road (PR) 346.
- The proponent must provide preliminary traffic projection. Based on this, the Region has decided that a detailed traffic impact study is needed. The study will assess traffic impact and identify any necessary highway improvements.
- The proponent must obtain a written confirmation from the Region that either drainage is not an issue or that any potential drainage issues have been addressed.
- Permits are required from MTI's Highway Design for construction activities required to construct a new access, modify an existing, intensify its use or relocate an existing access connection onto PTH 3 and/or PR 346. A permit may also be required for:
 - Any construction (above or below ground level) within 38.1 m (125 ft) from the edge of right-of-way of PTH 3 and/or PR 346. Information regarding control areas and circles can be found at the following link: <https://www.gov.mb.ca/mti/hpd/resources.html>
 - Any plantings within 15.2 m (50 ft) from the edge of right-of-way of PTH 3 and/or PR 346.
 - Discharge of water or other liquid materials into the ditch of PTH 3 and/or PR 346.
- For any Utility Installations crossing or paralleling PTH 3 and/or PR 346, a permission/agreement will be required from MTI before works may commence.
- The proponent is requested to provide the following information regarding the current traffic at the location:
 - The type of traffic/vehicles currently
 - The frequency of the traffic/vehicles entering and exiting the property daily
 - What direction will the traffic be coming from (right/left turn)
 - What direction will the traffic go when it leaves (right/left turn)
 - Hours of operation
 - Anticipation of higher volumes of traffic on specific days
- After reviewing the above, MTI Highway Design group confirmed that a full traffic impact study must be prepared by a qualified transportation engineer. It will identify the amount and type of traffic that will be generated by the development and its potential impact on the adjacent road network. The study will identify the type of on-highway improvements that will be required to safely accommodate the traffic generated by this development. The traffic impact study must be submitted prior to construction commencing.

Disposition:

These comments were shared with the proponent on August 1, 2025. The proponent provided the additional information to MTI Highway Design. After review of the additional information MTI Highway Design group indicated that a tentative approval will be issued while the proponent work on the Traffic Impact Study requirement. The cover letter of the licence

includes the requirement to obtain prior to construction the Traffic Impact Study required by Manitoba Transportation and Infrastructure and submit it to trafficimpactstudy@gov.mb.ca.

ADDITIONAL INFORMATION

In response to TAC comments, the Environmental Approvals Branch requested additional information request regarding:

- Submission of a Conditional Use Permit as required by the Community Planning Branch.
- Groundwater Monitoring and Emergency Response Plan

Proponent's Response to Information Request

On November 7, 2025, the proponent submitted a copy of the Conditional Use Permit issued by the Municipality of Killarney-Turtle Mountain.

On September 22, 2025, the provided the following:

- The proponent will collaborate with Machibroda to conduct additional site investigations such as more test holes and install monitoring wells.
- Request to delay drilling of additional monitoring holes until after project completion to avoid disturbing monitoring areas during construction. Preferred timing is post-spring thaw due to weather concerns.
- The on-site retail team will review and update the Emergency Response Plan updates after the project is completed and will include the new tank system, update site drawings, and contact surrounding residents in the event of a spill that could leach, similar to NH₃ release protocols considering wind direction.

Disposition:

The additional information was reviewed by Groundwater Management Section. The submission was deemed satisfactory provided:

- Initial sample reading is taken prior to the operation/storage phase
- Once the additional test holes are in place and a better delineation of the sandy aquifer extent, the proponent can plan the monitoring wells (both up and downstream) accordingly.

The draft licence includes conditions addressing these requirements.

PUBLIC HEARING

As no public comments were received, a public hearing is not recommended.

CROWN-INDIGENOUS CONSULTATION

The Government of Manitoba recognizes it has a duty to consult in a meaningful way with Indigenous communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of the Indigenous rights of that community.

The Initial Assessment conducted for this project has concluded that the licensing decision does not have the potential to adversely affect the exercise of an Aboriginal or Treaty right. Crown-Indigenous consultation will not be undertaken for the Nutrien Ag Solutions (Canada) Inc. – Ninga Bulk Material Handling Facility licensing decision. The project will be located on privately owned land that is currently disturbed and used for agricultural crop production.

RECOMMENDATION

Comments received have been addressed through the provision of information and licence conditions. I recommend that the development be licensed under The Environment Act subject to the specifications, limits, terms and conditions as described on the attached draft Environment Act Licence. I also recommend assigning the administration of the licence to the Western Region of the Environmental Compliance and Enforcement Branch.

Prepared by:

Donna Garcia
Pesticide and Agricultural Program Specialist
Livestock, Agriculture and Pesticides Section
Environmental Approvals Branch

December 19, 2025

E-mail: Donna.Garcia@gov.mb.ca | Telephone: 204-945-7065