

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Minago Development GP Inc.
PROPOSAL NAME: Minago Mining Project
CLASS OF DEVELOPMENT: 2
TYPE OF DEVELOPMENT: Mine
CLIENT FILE NO.: 5463.10

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

INTRODUCTION

The Minago Mine project was originally proposed by Victory Nickel Inc. and following the environmental assessment and licensing process, Environment Act Licence No. 2981 was issued on August 23, 2011, for the construction and operation of a 10,000 tonnes per day open pit nickel ore mining, milling and concentrating development.

On December 8, 2013, Victory Nickel Inc. submitted an environment act proposal to relocate the tailings management area of the licensed development. The environmental assessment process for the proposed changes to the development began and additional information was requested of the licensee.

Under the new ownership of Flying Nickel Inc., a notice of alteration was filed on July 21, 2022, to address the outstanding information of the existing notice of alteration and provide additional information regarding proposed changes to the mine site as licensed.

The information was distributed to Technical Advisory Committee (TAC) members on August 5, 2022, with the closing date for comments on August 19, 2022. As this was the continuation of an ongoing notice of alteration, the documentation was placed in the online Public Registry (<https://www.gov.mb.ca/sd/eal/registries/5463.1minago/index.html>) but not readvertised.

Ownership of the mine changed from Flying Nickel Inc. to Minago Development GP Inc. in 2025.

COMMENTS FROM THE PUBLIC

No public comments were received during the original public 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/5463.1minago/index.html>.

Table 1 Technical Advisory Committee Comments

No	Technical Advisory Committee Member	Response Provided
1	Environment, Climate and Parks	
	Environmental Approvals Branch	
	• Air Quality Management	No Response
	Environmental Compliance and Enforcement Branch	
	• Regional Office	Comments Provided
	Office of Drinking Water	No Concerns
	Drainage and Water Rights Licensing Branch	Comments Provided
	Water Science and Watershed Management Branch	
	• Water Quality Management Section	Comments Provided
	• Groundwater Management Section	No Response
2	Natural Resources and Northern Development	
	Wildlife and Fisheries Branch (wildlife)	Comments Provided
	Wildlife and Fisheries Branch (fisheries)	No Response
	Forestry and Peatlands Branch	Comments Provided
	Lands and Planning	Comments Provided
	Mining, Oil and Gas	Comments Provided
	Petroleum	No Concerns
4	Sport, Culture, Heritage and Tourism - Historic Resources Branch	Comments Provided
5	Municipal Relations	
	Community Planning Branch	Comments Provided
7	Infrastructure and Transportation	Comments Provided
8	Health, Seniors and Long-Term Care - Regional Health Authority	No response

Environmental Compliance and Enforcement Branch

The proposal and draft licence were discussed with the Environmental Compliance and Enforcement Branch throughout the environmental assessment and licensing and Crown-Indigenous consultation processes.

Drainage and Water Rights Licensing Branch

The comments from the Drainage and Water Rights Licensing Branch stated that a Water Rights Licence is required under The Water Rights Act.

Disposition:

The requirement for obtaining Water Rights Licence is stated in the cover letter for the draft licence. Clause 10 of the draft licence requires all necessary provincial and federal permits and approvals for construction of relevant components of the development prior to commencement of construction.

Water Quality Management Section

Detailed comments submitted regarding sampling information, studies conducted, aquatic life guidelines and Manitoba Water Quality Standards, Objectives and Guidelines.

Disposition:

Clause 57 of the draft licence requires the installation and calibration of a continuous effluent flow measuring device at the final discharge point for effluent monitoring.

Clause 58 of the draft licence states that any effluent discharged into the environment cannot be acutely lethal, would contribute to flooding and must meet defined criteria consistent with the federal Metal and Diamond Mining Effluent Regulations.

Clause 59 of the draft licence states that effluent cannot be discharged into the environment if the effluent quality is resulting in, or is likely to directly or cumulatively result in, a downstream degradation of the water quality immediately beyond a maximum 10% mixing zone (by volume) within the Minago River relative to the Manitoba Water Quality Standards, Objectives and Guidelines Regulation under The Water Protection Act and/or nutrient control strategies and regulations developed by the Manitoba Environment and Climate Change.

Clauses 63 and 64 of the draft licence require weekly, monthly and quarterly sampling of wastewater effluent for specific characteristics listed in within the draft licence.

Clause 65 of the draft licence requires downstream water sampling in the Minago River and analysis for specific parameters.

Clause 67 of the draft licence requires all sampling results to be submitted in an annual report to the environment officer.

Clause 69 of the draft licence requires the environmental effects monitoring program to be carried out in consultation with the Government of Manitoba.

Wildlife Branch

The comments from the Wildlife Branch requested copies of completed studies and that any bat or snake hibernacula observed be buffered by an appropriate distance determined through discussions with the Wildlife Branch.

Disposition:

Clause 34 of the draft licence requires a wildlife monitoring program be prepared in consultation with the Wildlife Branch and shall implement the plan as approved by the director of the Wildlife Branch.

Forestry Branch

Comment that a Timber Damage Appraisal would be needed prior to any cutting/bulldozing.

Disposition:

Clause 10 of the draft licence requires all necessary provincial and federal permits and approvals for construction of relevant components of the development prior to commencement of construction.

Lands and Planning Branch

Comments regarding land tenure, Crown Land general permits, and work permits.

Disposition:

Clause 10 of the draft licence requires all necessary provincial and federal permits and approvals for construction of relevant components of the development prior to commencement of construction.

Mining, Oil and Gas

Comments regarding determining the acid generating potential of rock units and the requirement for an approved mine closure plan.

Disposition:

Clause 66 of the draft licence requires acid rock drainage monitoring and testing in accordance with the Mine Environment Neutral Drainage (MEND) report or other methods approved by the director.

Clause 49 of the draft licence states that all waste rock at the development must be considered as potentially acid-generating rock unless and until it is proven to be non-acid generating through analytical testing.

Clause 51 of the draft licence states that potentially acid-generating rock/materials cannot be used or released as construction material.

Clause 70 of the draft licence requires the approval of a closure plan in accordance with The Mines and Minerals Act.

Historic Resources Branch

The comments provided by the Historic Resources Branch stated the need to follow the requirements of The Heritage Resources Act as well as a heritage resource management plan for the project.

Disposition:

Clause 35 of the draft licence requires compliance with the requirements of The Heritage Resources Act and a heritage resource management plan to be developed for the lifetime of the project to guide on-site operations and, if heritage resources and/or human remains are encountered during the construction of the development, suspend construction and immediately notify the Historic Resources Branch.

Clause 36 of the draft licence requires notification to local Indigenous Nations engaged on the project should heritage resources and/or human remains be uncovered within the project area of the development.

Clause 37 of the draft licence requires training and guidance on recognizing heritage resources (including archaeological, palaeontological, and natural heritage objects) and human remains to all employees and contractors working at the development.

Municipal Relations

General comments provided regarding Provincial Planning Regulations.

Disposition:

Clause 10 of the draft licence requires all necessary provincial and federal permits and approvals for construction of relevant components of the development prior to commencement of construction.

Infrastructure and Transportation

General comments provided regarding the requirements for permits to be obtained from Infrastructure and Transportation.

Disposition:

Clause 10 of the draft licence requires all necessary provincial and federal permits and approvals for construction of relevant components of the development prior to commencement of construction.

PUBLIC HEARING

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

CROWN-INDIGENOUS CONSULTATION

The Government of Manitoba recognizes that 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 concluded that the licensing decision does have the potential to adversely affect the exercise of an Aboriginal or Treaty right. Crown-Indigenous consultation was undertaken and a final consultation report was prepared and shared with the director of the Environmental Approvals Branch.

RECOMMENDATION

It is recommended that the notice of alteration be approved and subject to the specifications, limits, terms and conditions as described in the attached draft revised Environment Act Licence under The Environment Act. It is also recommended that the administration of the revised licence remains with the Environmental Compliance and Enforcement Branch.

Prepared by: Jennifer Winsor, P. Eng.
Senior Environmental Engineer
Environmental Approvals Branch
January 8, 2026