

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPONENT:** Potash and Agri Development Corporation of Manitoba Ltd. (PADCOM)  
**PROPOSAL NAME:** PADCOM Potash Mine and Processing Facility  
**CLASS OF DEVELOPMENT:** 2  
**TYPE OF DEVELOPMENT:** Mining  
**CLIENT FILE NO.:** 6126.00

### **OVERVIEW**

The September 2, 2021, Proposal was advertised as follows:

An Environment Act Proposal has been filed by PADCOM for the construction and operation of a potash mine and potash processing plant located on section 28-20-29 WPM in the Hamlet of Harrowby approximately 16 kilometers west of Russell in the Municipality of Russell-Binscarth. The potash will be mined using solution mining and processed to separate the potash from the brine solution in the processing plant. Following an initial mining production test of up to 70,000 tonnes of potash, the mine would be scaled to produce up to 250,000 tonnes per year of potash.

On October 18, 2021, the EAP was placed on the online Public Registry at:  
<https://www.gov.mb.ca/sd/eal/registries/6126/index.html>.

On October 19, 2021, the EAP was distributed to the Technical Advisory Committee (TAC) and a notice of the EAP was advertised in the Winnipeg Free Press on October 23, 2021 and the Russell Banner on October 25, 2021.

The closing date for comments from the public and TAC members was November 15, 2021.

### **COMMENTS FROM THE PUBLIC**

Nine public comments were received during the review period, with six of the comments expressing support for the project. For the purposes of this document, the public concerns have been summarized in general terms. Please review the information on the public registry for complete details of all individual public comments received during the environmental assessment and licensing process. A copy of all individual public comments can be reviewed at the following link:

<https://www.gov.mb.ca/sd/eal/registries/6126/index.html>.

General Public Concern Raised	Mitigation Options	Disposition and Draft Licence Condition
Concerns regarding surface water and groundwater effects.	Development and implementation of an approved groundwater monitoring plan.	<p>Clause 19 of the draft Licence requires silt fences during construction activities to mitigate surface runoff.</p> <p>Clauses 26 and 27 of the draft Licence require sampling and monitoring of the drainage pond water on a regular basis and in the event of a discharge to the environment.</p> <p>Clause 61 of the draft Licence requires the submission, approval and implementation of a groundwater monitoring plan.</p>
Project classification under the Classes of Development Regulation	The mining method for the project is consistent with other class 2 developments in the province.	
Air quality concerns	<p>Potash stockpiles are not permitted at the development.</p> <p>The processing of potash would occur indoors with industry standard air pollution control equipment.</p>	<p>Clause 29 of the draft Licence states that potash material stockpiles are not permitted outdoors at the development at any time.</p> <p>Clauses 35 to 39 of the draft Licence require the use and maintenance of air pollution control devices.</p> <p>Clauses 40 to 48 of the draft Licence set up specific air emission limits, monitoring and reporting.</p>

**SUMMARY OF COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE**

<b>No.</b>	<b>Technical Advisory Committee Member</b>	<b>Response Provided</b>
1	Impact Assessment Agency of Canada	Comments
2	Manitoba Natural Resources and Northern Development	
	<ul style="list-style-type: none"> <li>• Mining, Oil and Gas</li> </ul>	Comments
	<ul style="list-style-type: none"> <li>• Forestry and Peatlands</li> </ul>	No Concerns
	<ul style="list-style-type: none"> <li>• Petroleum Branch</li> </ul>	No Concerns
	<ul style="list-style-type: none"> <li>• Wildlife and Fisheries Branch</li> </ul>	Comments
	<ul style="list-style-type: none"> <li>• Lands Branch</li> </ul>	Comments
3	Manitoba Environment, Climate and Parks	
	<ul style="list-style-type: none"> <li>• Groundwater Management</li> <li>• Air Quality Management</li> <li>• Water Quality Management</li> <li>• Parks and Protected Spaces Branch</li> <li>• Environmental Compliance and Enforcement</li> <li>• Office of Drinking Water</li> <li>• Drainage and Water Rights Licensing</li> </ul>	Comments Comments Comments No Concerns Comments Comments Comments
	<ul style="list-style-type: none"> <li>• Manitoba Sport, Culture, and Heritage Branch</li> </ul>	No Response
4	Manitoba Transportation and Infrastructure	No Concerns
5	Manitoba Labour, Consumer Protection and Government Services	No Response
6	Manitoba Health, Seniors and Active Living – Environmental Health Unit	No Concerns

A copy of the detailed responses from the Technical Advisory Committee and all additional information provided can be reviewed at the following link:

<https://www.gov.mb.ca/sd/eal/registries/6126/index.html>.

For the purposes of this document, the responses have been summarized in general terms. Please review the information on the public registry for complete details.

**SUMMARY OF COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE**

**Impact Assessment Agency of Canada**

On February 14, 2022, the Minister of Environment and Climate Change decided that the project does not warrant designation pursuant to subsection 9(1) of the Impact Assessment Act.

### **Manitoba Natural Resources and Northern Development – Mining, Oil and Gas**

- Requests for clarification on the proposed project details and location.

#### **Proponent Response (February 15, 2022):**

The proponent responded with detailed additional information regarding the project to address the comments raised including processing and drill hole information and the process water pond.

#### **Disposition:**

Clause 18 of the draft Licence requires the licensee to 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.

### **Manitoba Natural Resources and Northern Development – Lands Branch**

- For any occupation to occur on the land, an application to crown land tenure will be required and for any work activity to occur on crown land under the Crown Lands Act will require a Crown Lands Permit.

#### **Disposition:**

Clause 5 of the draft Licence requires the licensee to acquire any necessary land agreements prior to constructing the Development.

Clause 18 of the draft Licence requires the licensee to 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.

### **Manitoba Environment, Climate and Parks – Groundwater Management Section**

- Requests for additional information regarding the brine injection well, hydrogeology and the process water pond.

#### **Proponent Response (February 15, 2022):**

The proponent responded with detailed additional information regarding the project to address the comments raised including the process water pond, the brine injection wells, and proposed groundwater monitoring plan.

#### **Groundwater Management Branch Response (March 23, 2022):**

No further concerns.

Disposition:

Clause 19 of the draft Licence requires silt fences during construction activities to mitigate surface runoff.

Clauses 26 and 27 of the draft Licence require sampling and monitoring of the drainage pond water on a regular basis and in the event of a discharge to the environment.

Clause 61 of the draft Licence requires the submission, approval and implementation of a groundwater monitoring plan.

**Manitoba Environment, Climate and Parks – Air Quality Management Branch**

- Suggestion that the proponent should conform to Environment and Climate Change Canada (ECCC)'s "Code of Practice for the Management of PM2.5 Emissions in the Potash Sector in Canada" appropriately.

Proponent Response (February 15, 2022):

The proponent responded that they acknowledge and confirm that they will adhere to Environment and Climate Change Canada's "Code of Practice for the Management of PM2.5 Emissions in the Potash Sector in Canada" where appropriate and related to solution mining.

Disposition:

Clauses 35 to 39 of the draft Licence require the use and maintenance of air pollution control devices.

Clauses 40 to 48 of the draft Licence set up specific air emission limits, monitoring and reporting.

**Manitoba Natural Resources and Northern Development – Wildlife and Fisheries Branch**

- Requests for additional information regarding potential endangered species, species at risk, ecosystems, wildlife, and habitat assessments.

Proponent Response (February 15, 2022):

The proponent responded with detailed additional information regarding the project to address the comments raised regarding the ecosystems, wildlife and habitat assessments.

Wildlife and Fisheries Branch Response (March 23, 2022):

No further concerns.

Disposition:

Clause 18 of the draft Licence requires the licensee to 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.

**Manitoba Environment, Climate and Parks – Water Quality Management Section**

- Requests for additional information and details regarding how the development would potentially affect surface water quality.

Proponent Response (February 15, 2022):

The proponent responded with detailed additional information regarding surface water management and mitigation measures.

Water Quality Management Branch Response (March 22, 2022):

No further comments.

Disposition:

Clause 19 of the draft Licence requires silt fences during construction activities to mitigate surface runoff.

Clauses 26 and 27 of the draft Licence require sampling and monitoring of the drainage pond water on a regular basis and in the event of a discharge to the environment.

Clause 61 of the draft Licence requires the submission, approval and implementation of a groundwater monitoring plan.

**Manitoba Environment, Climate and Parks – Environmental Compliance and Enforcement**

- Requests for clarification on dust management product to be used at the development and wastewater hauling volumes.

Proponent Response (February 15, 2022):

The proponent responded with detailed additional information regarding use of dust suppressant material and the onsite wastewater system.

Disposition:

Clause 12 of the draft Licence requires the licensee to comply with the provisions of the Onsite Wastewater Management Systems Regulation or any future amendment thereto.

Clause 54 of the draft Licence requires the licensee to use onsite holding tanks and have all wastewater removed regularly by a licensed hauler to a wastewater treatment facility operated under the authority of a Licence issued under The Environment Act.

**Manitoba Environment, Climate and Parks – Office of Drinking Water**

- Requested additional information to assess potential impacts to drinking water resulting from the development.

Proponent Response (February 15, 2022):

The proponent responded with detailed additional information regarding the project and potential drinking water impacts.

Office of Drinking Water Response (March 17, 2022):

No further comments.

Disposition:

Clause 19 of the draft Licence requires silt fences during construction activities to mitigate surface runoff.

Clauses 26 and 27 of the draft Licence require sampling and monitoring of the drainage pond water on a regular basis and in the event of a discharge to the environment.

Clause 61 of the draft Licence requires the submission, approval and implementation of a groundwater monitoring plan.

**Manitoba Environment, Climate and Parks – Drainage and Water Rights Licensing**

- Comments that any water control works would require a license or registration and the application for a water rights license is required.

Disposition:

Clause 18 of the draft Licence requires the licensee to 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.

## **PUBLIC HEARING**

The Director made the decision to not recommend to the Minister of Environment, Climate and Parks that a public hearing be held and that decision was communicated to the members of the public who made the initial requests.

## **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 Crown-Indigenous Consultation Initial Assessment, prepared by Manitoba Natural Resources and Northern Development, was completed for this project and sent to the Environmental Approvals Branch.

The initial assessment report concluded that no formal Crown-Indigenous Consultation was recommended as the proposed project would be developed on previous commercial/industrial use lands adjacent to the CP Rail line within the old town site and surface rights are privately held. The report also recommended that the company keep the First Nations and Metis informed of all activities they propose to do in the area and continue discussion with these communities.

## **RECOMMENDATION**

The attached draft Environment Act Licence contains specifications, terms and conditions for the Director of The Environment Act's consideration for licensing of the construction and operation of the PADCOM potash mine and processing facility.

Should an Environment Act Licence be issued for the proposed Development, enforcement of the Environment Act Licence should be assigned to the Environmental Compliance and Enforcement Branch of Manitoba Environment, Climate and Parks.

Jennifer Winsor, P.Eng.  
Manitoba Environment, Climate and Parks  
May 24, 2022