

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: RM of Stanley
PROPOSAL NAME: Stanley Regional Wastewater Collection System
CLASS OF DEVELOPMENT: 2
TYPE OF DEVELOPMENT: Wastewater Pipeline
CLIENT FILE NO.: 6248.00

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

The Rural Municipality of Stanley submitted a proposal dated January 28, 2025, to install an 11 km long wastewater forcemain, two lift stations, and low-pressure sewer systems to service the communities of Schanzenfeld and Reinfeld. The goal is to replace the existing network of sewage holding tanks and truck-hauled wastewater with a more efficient and environmentally sustainable Low-Pressure Sewer (LPS) system that connects to the City of Winkler’s Wastewater Treatment Facility (WWTF) via the lift stations and forcemain. The forcemain generally runs along municipal and provincial roads within the Rural Municipality of Stanley and crosses roads, railways (CP Rail), and waterways such as the Hespeler Drain and Deadhorse Creek tributary. Adjacent land use includes privately owned residential lots, agricultural fields, and road rights-of-ways. The area is zoned as Agriculture Limited (AL), Community Residential (RC), and General Development (GD).

The proposal was advertised in the Winkler Morden Voice on March 27, 2025. It was placed in the online Public Registry as follows: <https://manitoba.ca/sd/eal/registries/6248/index.html>.

The proposal was distributed to Technical Advisory Committee (TAC) members on March 19, 2025.

The closing date for comments from members of the public was April 28, 2025.

The closing date for comments from TAC members was April 21, 2025.

COMMENTS FROM THE PUBLIC

No.	Public Comment
	No public comments received during the public comment period

TECHNICAL ADVISORY COMMITTEE COMMENTS

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://manitoba.ca/sd/eal/registries/6248/index.html>.

Table 1 Stanley Regional Wastewater Collection System -TAC Comments

No	Technical Advisory Committee Member	Response Provided
1	Environment and Climate Change	
	Environmental Approvals Branch	
	<ul style="list-style-type: none"> Air Quality Management 	No response
	Environmental Compliance and Enforcement Branch	
	<ul style="list-style-type: none"> ECE – South Central Region 	April 16, 2025
	<ul style="list-style-type: none"> Onsite Wastewater Management 	June 11, 2025
	Office of Drinking Water	March 20, 2025
	Drainage and Water Rights Licensing Branch	
	<ul style="list-style-type: none"> Drainage and Water Rights Licensing Section 	March 25, 2025
	<ul style="list-style-type: none"> Water Use Licensing Section 	April 7, 2025
	Water Science and Watershed Management Branch	
	<ul style="list-style-type: none"> Water Quality Management Section 	No response
	<ul style="list-style-type: none"> Groundwater Management Section 	No response
	Climate Action and Energy Innovation Division	April 16, 2025
	Parks and Trails	April 17, 2025
	Aquatic Invasive Species	No response
2	Natural Resources and Indigenous Futures	
	Wildlife and Fisheries Branch (wildlife)	No response
	Wildlife and Fisheries Branch (fisheries)	April 22, 2025
	Forestry and Peatlands Branch	March 20, 2025
	Lands and Planning	April 11, 2025
	Crown Land Specialist	No response
3	Business, Mining, Trade and Job Creation	
	Mines	March 24, 2025
	Petroleum	April 17, 2025
4	Sport, Culture, Heritage and Tourism	
	Historic Resources Branch	April 2, 2025
5	Municipal and Northern Relations	
	Community Planning Branch	No response
6	Transportation and Infrastructure	
	Highway Operations Region	No response
	Roadside Development	No response
	Hydrologic Forecasting & Water Management Technical	No response

7	Health, Seniors and Long-Term Care	
	South Central Region – Regional Health Authority	No response
8	Environment and Climate Change Canada	
	Impact Assessment Agency of Canada	No response

Climate Action and Energy Innovation Division (CAEI)

GHG Inventory Gaps:

While the EA appears to adequately address many aspects of the Environment Act, it offers minimal coverage of the requirements under the Climate and Green Plan Act, particularly in the areas of climate resilience and GHG emissions. GHGs are discussed qualitatively, without numerical estimates of quantification of GHG emissions.

The Province of Manitoba has committed to a Carbon Savings Account Target of 5.6 MT for the period 2023-2027. As such, the province needs to understand potential GHG savings or increases associated with proposed developments across their construction, operation, and decommissioning phases. While the document mentions that the proposed system would reduce GHG emissions by eliminating the need for wastewater hauling by diesel trucking, it does not include an estimation of GHG reduction that quantifies the benefit between a scenario including the proposed development and a scenario without the project.

Recommendation: Provide an addendum that includes an estimate of GHG emission reductions relative to baseline trucking operations. Include estimates for emissions related to construction, operations, diesel generator use, net emission reductions from displaced truck transport.

1. Lack of Alignment with Net-Zero Pathways:

The assessment lacks discussion on the project's alignments with Manitoba and Canada's targets for net-zero emissions by 2050.

Recommendation: Provide scenario analysis discussing project's alignment with 2050 Net-zero pathways, and identify measures undertaken to minimize GHG emissions associated with the project.

2. Incomplete Climate Resilience Assessment:

While the Environment Act Proposal (EAP) identifies basic risks related to accidents, malfunctions, and operational continuity, it does not incorporate a climate resilience lens in accordance with the expectations under Manitoba's *Climate and Green Plan Act*. The submitted EAP assumes baseline environmental and operational conditions will remain static and does not evaluate how climate-exacerbated risks (i.e., increased flooding, prolonged power outages, or extreme weather variability) could increase the probability or severity of accidents and infrastructure failures.

Specifically:

- The accidents and malfunctions section assumes that power failures and extreme weather events are rare and manageable under current conditions only.
- No references made to climate projections for the region.

- The discussion does not consider how climate change, impacts such as more frequent or prolonged extreme weather events could increase the likelihood or severity of accidents and malfunctions.
- There is no assessment of where the diesel generator backup capacity (fuel supply, generator runtime) is sufficient for longer or multiple outages anticipated in future climate scenarios.
- No adaptation measures proposed to enhance resilience against future climate-exacerbated risks including compound flooding, service interruptions or infrastructure failures.

Recommendation: Conduct a screening-level climate change vulnerability assessment for the project infrastructure, including lift stations, forcemains and low-pressure sewer systems.

A screening-level assessment should cover projected climate change impacts for southern Manitoba (e.g., increased precipitation intensity, freeze-thaw variability, more frequent and intensified extreme weather events) across the project's operational life. Climate Profiles for Manitoba Municipalities and regions have been prepared by the Prairie Climate Centre through their Climate Atlas of Canada, please see [Climate Cards for Manitoba RMs | Climate Atlas of Canada](#). The Prairie Climate Centre also provides Climate Resilience Vulnerability Assessment Guidance on their website. Based on the findings of this assessment, the proponent should identify any necessary adaptive measures (e.g. flood proofing at lift stations, enhancing backup power supply redundancy, etc.) to provide long-term operational resilience and regulatory compliance with the Climate and Green Plan Act. Incorporating resilience screening will align the project's environmental review with provincial policy objectives for climate adaptation, critical infrastructure protection, and risk reduction.

Disposition:

The comments were shared with the proponent. The requirements to submit GHG emissions assessment report is included in the draft licence.

ADDITIONAL INFORMATION

The branch requested additional information on March 7, 2025, and October 29, 2025, and received responses on March 10, 2025, and November 25, 2025. Responses were satisfactory.

PUBLIC HEARING

A public hearing is not recommended, as no public requests for a hearing were received.

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 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 Stanley Regional Wastewater Collection System licensing decision. The project would occur on municipal road rights-of-way and on 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 South-Central Region of the Environmental Compliance and Enforcement Branch.

Prepared by:

Desalegn Edossa, P. Eng.
Senior Environmental Engineer
Land Use, Waste Management and Energy Section
Environmental Approvals Branch

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E-mail: Desalegn.Edossa@gov.mb.ca || Telephone: 204-945-7021