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To: Impact Assessment Agency of Canada

Re: Brandon dispatchable capacity project

From: Dr. John Sinclair, Professor and Director, Natural Resources Institute, University of Manitoba

Thank you for the truncated opportunity to comment on the initial project description for the Brandon dispatchable capacity project proposed by Manitoba Hydro. My students and I have been working on impact assessments and impacts assessment processes for over thirty years. I have participated in many Federal Minister and Agency led activities including the Strategic Assessment of Climate (SACC).

I will limit my comments on this proposed project to the one issue of climate (i.e. greenhouse gas emissions). Having said that, this one issue is perhaps "the issue" given the continued effects of climate change on the planet, in Canada, Manitoba and the project area itself. There is little doubt that any additional GHGs emitted through burning more fossil fuels need to be very carefully considered, no matter how small because the cumulative effects of more emissions are now well documented.

In this regard, the summary of Project Description says:

> 6.0 Strategic Assessment
> No strategic assessments have been carried out that are relevant to the project. However, a Strategic Assessment of Climate Change (Government of Canada [GOC] 2020) conducted under Subsection 95(2) of the Impact Assessment Act could be applicable to the project.

I would argue that "could" should surely be "will" or "shall". There is no question that there are climate change dimensions here, including the very issues covered by the SACC, and that therefore the SACC should be applied. In fact, this project provides the ideal opportunity to "get it right" in terms of how the SACC ought to now be applied in today's IAA post-amendment period since this is a smaller project and does not carry with it the controversy of a pipeline or bitumen project. As made very clear by the Supreme Court of Canada, there are ZERO constitutional/jurisdictional constraints on the inclusion of climate and GHG aspects by the

IAAC in the assessment phase. The importance of this approach to this IA is also underscored by the stated fact that no regional assessment of any sort has been undertaken around the proposed development.

The proposed project also stands in stark contrast to the policy direction the provincial government has set on lowering GHG emissions. The Mandate letter to the Minister of Manitoba Hydro indicated that they should,

> *Examine options for increasing low-carbon energy generation and storage, including wind and solar, to grow Manitoba's electrical supply to meet energy transition and clean grid requirements without the need for new natural gas plants.*

Manitoba's path to Net Zero plan indicates that the province will,

> *Work toward making a net-zero electricity grid by 2035.*
> *Manitoba will modernize and expand its hydroelectric system while adding new renewable electricity generation. Investments in a provincial smart grid will enhance storage, improve reliability, and increase efficiency.*

This was to be achieved in part through a distributive energy supply.

Given this and other like policy directions, one must question why this proposal is coming forward since if the project proceeds it will not help us lower our GHG emissions or meet stated policy goals. This makes it very hard to assess how Manitoba will action in a meaningful way the information provided to satisfy Clause 12.0.2 of the *Environment Act* which requires proponents to provide "…the amount of greenhouse gases to be generated by the proposed facility". Based on experience, in looking at recent projects in the registry files the only one where GHGs received attention was the Keeyask project, a process that was strongly influenced by the federal government as it was also subject to a CEAA comprehensive study. For other projects where GHG emissions were reported there are no reasons for decision offering insight as to how the potential GHGs emissions reported were considered. And with no access to mitigation and monitoring plans, it is very difficult to determine what, if anything, happened after licencing in relation to the GHG emission numbers reported. This illustrates how collecting GHG numbers in the abstract is virtually meaningless without a way for decision makers to contextualize them. The is no consistency or standard comparable to the SAAC for considering GHG emissions in Manitoba.

Lastly, when I visited the project Agency website about this project proposal a few days ago I noted that there were no comments on the project and currently just two posted. With a 20 day comment period that started the day before Canada Day, which sees many take long weekends, the Winnipeg Folk Fest and perhaps most importantly record flooding in Southwestern Manitoba in and around the proposed site, as well as the wildfire situation affecting the province, it is perhaps not at all surprising and should not be taken as disinterest in the project. I assume the comment period will be extended due to the disruptive climate educed events.