



# MANITOBA ECO-NETWORK

302 – 583 Ellice Avenue, Winnipeg MB R3B 1Z7

Tel: 204-947-6511 [www.mbeconetwork.org](http://www.mbeconetwork.org)

July 24, 2023

Agnes Wittmann  
Director Environmental Approvals Branch  
[Agnes.Wittmann@gov.mb.ca](mailto:Agnes.Wittmann@gov.mb.ca)

Bryce Wood  
Environment and Climate Contact  
[bryce.wood@gov.mb.ca](mailto:bryce.wood@gov.mb.ca)

[publicregistry@gov.mb.ca](mailto:publicregistry@gov.mb.ca)

## **Re: Comments on EAP – Alamos Gold Inc. – Lynn Lake Gold Project Substation**

In this letter, the Manitoba Eco-Network provides comments on Alamos Gold Inc.'s proposed Lynn Lake Gold Project Substation. We appreciate the ongoing dialogue we have with the Department of Environment and Climate about environmental assessment in Manitoba. We have therefore included some questions that would better help us understand the current assessment process for the Lynn Lake Gold Project as a whole. There is a lack of details in the EAP, as discussed below. We recommend requesting more information from the proponent to fill gaps before continuing with the assessment process.

### **Project Splitting & Different Standards of Assessment**

It is our understanding that the related Lynn Lake Gold Project has been recently received federal approval from the Minister of Environment and Climate Change, which resulted in provincial licenses being issued for the Gordon Mine (3390) and MacLellan Mine and Processing Facility (3391) components of the project.

We are confused why the proposed substation and transmission line was not included in the federal impact assessment process. This situation where a proposed development has been split into multiple parts, with different levels of government assessing and approving the different parts, causes significant confusion on the part of citizens and public interest organizations seeking to engage in approval processes. The federal Summary of the Environmental Impact Statement for the Lynn Lake Gold Project noted that the “[r]equired upgrades to the power distribution system are expected to be assessed, built, owned and operated by Manitoba Hydro” (p. 2.10), and yet the proponent of record for the Substation Project is Alamos Gold.

**Questions:**

- Why has the Environmental Approvals Branch allowed the project to be split and the substation and transmission lines excluded from the federal application for the Lynn Lake Gold Project?
- How will the identified “equipment and transmission modifications made by Manitoba Hydro to existing transformer station to accommodate the proposed substation” (EAP, p 2) be assessed and approved?

**Consideration of Alternatives**

In the Substation EAP, project alternatives and site selection were discussed. Three hydroelectric options and one on-site diesel generator were identified. The existing distribution line and on-site ROW were ultimately selected. We found this section to lack details which made it difficult to understand how these alternatives were selected and how they were considered. We would recommend requesting more information from the proponent, in particular, more details about the three hydroelectric options and the impact on Manitoba’s electrical grid. For example, is there generation and transmission capacity to support the overall Gold Project and expanded demand growth in associated communities? Information from Manitoba Hydro’s 2023/24 & 2024/25 General Rate Application indicates that Manitoba is going to face electricity supply issues. (Public Utilities Board, MFR 43, November 15, 2022)

**Questions:**

- Did the proponent include a mix of green alternatives besides hydroelectricity, such as wind and solar?
- How will the preferred alternative impact Manitoba’s electrical grid since it will be connected and draw energy from provincial energy systems?

**Public Engagement and Indigenous Consultation**

The very brief public engagement section of the EAP seems to indicate that there was very little discussion of the proposed substation as part of the larger Gold Project. For example, the EAP indicates that, “To date, there has been little specific engagement with Marcel Colomb First Nation on the substation” (p 30) despite the fact that “Mathias Colomb Cree Nation expressed some concern as to whether all the infrastructure associated with substation and distribution line have been accounted for in the estimated area of disturbance for the Project (i.e., LLGP).” (p 30) There also appears to have been no public meetings held or other opportunity for public engagement beyond a public notice placed around town that invited emails with concerns about the project.

The lack of public consultation and Indigenous engagement is very concerning. If this is to be treated as a separate component of the overall Gold Project, then there is a need for a separate and meaningful engagement opportunities for the public and Indigenous communities.

**Questions:**

- What is the status of Indigenous Consultation processes for this proposed development?

- Have other opportunities for public engagement been provided, such as an in-person event?

The Department of Environment and Climate plays a very important role in protecting the environment in Manitoba. Under *The Environment Act*, the Department is tasked with protecting the quality of the environment and environmental health of present and future generations and providing the opportunity for all citizens to exercise influence over the quality of their living environment. We are confident you will adhere to these principles and ensure an informed decision about the proposed development is made.

Sincerely,

Patricia Fitzpatrick, Ph.D.  
Policy Committee Chair

Heather Fast, J.D., LL.M.  
Policy Advocacy Director

***About Manitoba Eco-Network:***

Since 1988, Manitoba Eco-Network has promoted positive environmental action by supporting people and groups in our community. Our programming focuses on policy advocacy, engagement in consultation processes and developing capacity building tools that benefit the environmental non-profit sector and our member groups. We are a public interest environmental organization seeking to promote and facilitate good environmental governance and the protection of Manitoba's environment for the benefit of current and future generations.