



MANITOBA ECO-NETWORK

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Re: Brandon Dispatchable Capacity Project – MbEN Comments on the Initial Project Description

Thank you for the opportunity to provide comments on the [Initial Project Description for the Brandon Dispatchable Capacity Project](#) (also referred to as the proposed project). Manitoba Eco-Network (MbEN) recommends this project be subject to a federal impact assessment as there are numerous potential impacts within federal jurisdiction that will not adequately be assessed by Manitoba's provincial impact assessment process.

Based on the minimal information included in the [Initial Project Description](#), there appears to be potential impacts within a number of areas of federal jurisdiction, including potential adverse impacts on fish and fish habitat, aquatic species, wildlife and migratory birds, and the environment (e.g., air emissions, greenhouse gas [GHG] emissions), as well as potential impacts for Indigenous rights-holders. The potential direct and incidental adverse effects from the carrying out of the designated project are significant and numerous. This project will quadruple the amount of fossil fuel-powered electricity generation in Manitoba, which will result in a significant impact on the overall emissions of the province of Manitoba. The close proximity to the Assiniboine River as well as the Douglas Marsh means there is potential for significant impact to fish, birds, and other federally protected species. The Assiniboine River is also a place of cultural and historical importance, so there are also potential impacts on the rights of Indigenous peoples. Federal involvement in the impact assessment of this project is necessary as Manitoba's provincial impact assessment process alone will not adequately address the potential federal impacts of this project.

MbEN believes that federal involvement in the impact assessment of the proposed project is required to ensure that all the factors outlined in section 22 of the *Impact Assessment Act* (IAA or simply the "Act") are adequately considered. The federal impact assessment process requires more detailed information about potential impacts than Manitoba's process, and will ensure the potential impacts within federal jurisdiction of the proposed project are properly assessed

before a decision is made. For example, the federal process requires more detailed information about cumulative impacts, gender impacts, and GHG emissions, among other things. Federal impact assessment requirements also ensure more resources (like funding) are available for Indigenous rights-holders who want to get involved.

Given the significant influence that Manitoba Hydro, as a Crown corporation, has on provincial governments and decision makers, federal involvement in the impact assessment of the proposed project will add an outside perspective that will offer more objectivity than if the project was assessed solely at the provincial level.

Ultimately, given potential impacts within federal jurisdiction that will not adequately be assessed by Manitoba's provincial impact assessment process it is incumbent that a federal impact assessment take place. We recognize that this could be a good opportunity for a harmonized assessment under the [Co-operation Agreement between Manitoba and Canada on Environmental and Impact Assessment](#) in accordance with the Part 5(4) of the Agreement and ss. 31 and 33 of the IAA, however, we are not supportive of a substituted process under Part 5(3) of the Agreement. We also note that Parts 6 through 10 of the Agreement provide for coordination between the Agency and Manitoba on potential conditions, permitting, information sharing and communications, and participant funding regardless of process.

Concerns About Timing and Public Consultation

The public comment period for the Initial Project Description was poorly timed and will likely negatively affect the number of public comments received. MbEN suggests the deadline should be extended, or additional consultation undertaken, for a number of reasons. First, the announcement of the consultation period was published near the end of the day on June 30th, just before the July 1st holiday (a popular time for people to take vacations in Manitoba). Second, the public consultation period was limited to 20 days, while other open files in the IAAC registry were assigned longer comment periods.

Most egregiously, this engagement opportunity takes place while the Assiniboine River floods. The City of Brandon and Sioux Valley Dakota Nation issued states of emergency on July 5, 2026, and the crest occurred on approximately July 13th. Out of respect for local residents, who have understandably been dealing with more urgent and pressing matters, the public comment deadline should be extended.

MbEN's final concern about timing is that Manitoba Hydro's Integrated Resource Plan (IRP) and Major New Facilities (MNF) application — which pertains to the Brandon Dispatchable Capacity Project — is presently before [Manitoba's Public Utility Board \(PUB\)](#), with hearings scheduled from July 27th till September 4th. Manitoba Eco-Network, in partnership with Environmental Defence, is an intervenor in these hearings. The PUB process, decision, and recommendations regarding Manitoba Hydro's IRP will directly impact the proposed development and potentially change the baseline information that has been relied upon for the development of the Initial Project Description.

There have also already been updates to the information relied upon in the Initial Project Description, including [updated supply and demand tables](#). It is not clear how, if at all, that these updates have been reflected in the initial project description as filed. Further updates throughout the PUB process are likely. Thus, the project as described may very well be modified or changed before it receives provincial Cabinet approval, and Cabinet approval is in no way guaranteed. Due to the direct influence these hearings have on the proposed project, MbEN feels that this impact assessment has begun prematurely and should be paused until the completion of any relevant PUB proceedings so the Initial Project Description can be updated accordingly.

Potential Impacts Within Federal Jurisdiction

This project should be required to undergo a full federal assessment or a harmonized assessment under the Canada/Manitoba Agreement as there are considerable gaps and inconsistencies in the information provided to the IAAC by Manitoba Hydro about the potential impacts of the proposed project within both federal jurisdiction. As a result, MbEN feels a full federal impact assessment is required to ensure potential impacts with federal jurisdiction are properly addressed by Manitoba Hydro.

Consultation, Accommodation, and Reconciliation

Canada's Constitution requires that obligations to Indigenous Peoples and Nations are paramount. The integration of Indigenous participation in impact assessments supports the Government's commitment to reconciliation by providing tools for effective and meaningful participation with Indigenous peoples during the assessment process.

Reconciliation needs to be at the centre of all aspects of the Government of Canada's relationship with Indigenous peoples, who have a distinct and special Constitutional relationship with the Crown that extends beyond the general principles and requirements of public participation.

MbEN is not a rightsholder, and so we do not purport to speak for Indigenous Rightsholders, but we have committed through our values to "amplify Indigenous voices" and "promote evidence-based solutions" which includes stressing solutions that are supported by Indigenous knowledge.

The proponent hosted a Multi Nation Indigenous Engagement Circle on March 20, 2026. As outlined in the IPD, several concerns were raised:

- concerns related to water quality and quantity for both surface water and groundwater, including potential downstream impacts to the Assiniboine River;
- impacts of the project on culturally important species, including impacts to the movement of moose and elk;
- economic benefits to Nations because of the project;

- ways the engagement process could be made more meaningful, including more Elder, youth, and leadership participation in engagement activities;
- and general routing preferences (which will be elaborated on further below as an illustrative example).

The Engagement Circle only took place four months ago, and it is unclear if and/or how these concerns have been addressed in the material provided by the proponent. There is no further mention of elk or moose in the IPD to address the concerns raised about impacts on those culturally important species. Likewise the proponent acknowledges that a general routing preference to parallel the proposed gas pipeline along highways and existing infrastructure¹ to reduce impacts to grasslands was something which came out of the multi-Nation Indigenous engagement circle held by the proponent. (IPD 1-15). However, no discernible changes to the routing can be identified (see for instance IPD 2-30, 2.8.1.3 Pipeline Routing). It does not seem that the proponent has modified the project to address the preferences expressed at the Indigenous engagement circle (and since only four months has elapsed, the possibility to incorporate them is limited accordingly). Simply recording the concerns raised is not enough, actual changes to the project need to be made in response to this engagement. Failing to address these concerns does not instill confidence that the proponent is actually accommodating Indigenous concerns that have been raised.

Federally Protected Aquatic Species, Fish and Fish Habitat

The Initial Project Description indicates there are potential impacts to aquatic species, fish and fish habitat that fall within federal jurisdiction. However, the information provided by Manitoba Hydro about potential impacts to fish and related habitat is vague. A brief mention is made of species at risk that may be impacted, but nothing is discussed further with respect to how these potential impacts will be addressed. MbEN's concerns about federally protected fish and fish habitat are supported by the comments of Fisheries and Oceans Canada (DFO) filed on the IAAC registry on July 10, 2026 ([Document 167199E](#)). DFO identifies that authorizations under the *Fisheries Act* are likely to be required as the proposed works, undertakings, or activities could result in the death of fish and/or the harmful alteration, disruption, or destruction of fish habitat. Authorizations under the *Species at Risk Act* are also potentially required given the presence of the Mapleleaf Mussel, a threatened aquatic species. The comments of DFO make it clear that there is insufficient information to accurately assess impacts and whether and what federal authorizations will be required. Thus, a federal impact assessment for this project is warranted. The comments of DFO also highlight the importance of including the ancillary works (e.g., new Intake infrastructure in the Assiniboine River) within the scope of the project's impact

¹ For background context there is already an existing pipeline that supplies the existing units 6 & 7. It connects to the TransCanada natural gas pipeline just north of Forrest, Manitoba, close to the intersection of Manitoba Highway #10 and Manitoba Provincial Road #353. The new proposed pipeline will connect at the Moore Park Primary Gate State, which located approximately 12 km to the East on the TransCanada pipeline, just north of Justice, Manitoba, to the northeast of the intersection of Manitoba provincial Provincial Roads #468 and #353. (See IPD Map 1-1: Project Description).

assessment given their likelihood to impact fish and related habitat and/or aquatic species at risk.

Federally Protected Birds

There is a federal authority and responsibility to protect migratory birds (*Migratory Birds Convention Act*) and bird species that are listed under the *Species At Risk Act*. The IPD, pg 3-21 acknowledges “[t]he ranges of at least 144 migratory bird species overlap the wildlife study area (eBird 2026), some of which may breed within (Cornell Lab of Ornithology 2026).

There is insufficient information to accurately assess impacts and whether and what federal authorizations will be required. Thus, a federal impact assessment for this project is warranted given the potential for non-negligible adverse changes to federally protected birds.

Federally Protected Wildlife

There are also other species of concern for which federal approvals may be required. In addition to the fish and bird species already identified, other noteworthy species that are recognized as being in need of protection under federal laws were identified in the IPD. “The ranges of 44 wildlife SAR (those listed as Endangered, Threatened, or Special Concern under SARA) overlap the wildlife study area, including 2 amphibians, 2 reptiles, 23 birds, 3 mammals, and 14 insects (Appendix E)” (IPD 3-21). Notable species include the eastern tiger salamander, northern leopard frog, and endangered bat species. Also not identified is the Northern Prairie Skink, whose habitat includes the Brandon Sandhills area which is not far from the proposed project, see the [Management Plan for the Prairie Skink \(*Plestiodon septentrionalis*\) in Canada 2025](#). Once again the insufficient amount of information, when federal impacts may occur and federal approvals may be required, necessitate a federal impact assessment.

GHG Emissions

Canada has obligations under the *Paris Agreement* and the *United Nations Framework Convention on Climate Change* to reduce GHG emissions. A thorough GHG analysis including an estimate of all GHG emissions is required for a proper impact assessment. This is supported by the [Information and Management of Time Limits Regulations](#) under the Act, and Schedule 1, Part E-23 in particular that requires “[a]n estimate of any greenhouse gas emissions associated with the project (emphasis added).” This information is required by regulation to be in the IPD so the agency has the information it needs to make a s. 16 IAA decision.

This proposed project has the potential to be among the largest, if not the largest single point-source emitter in the province (particularly in a drier year when the utilization rate might be higher). We are facing a planetary crisis, and any unnecessary GHGs emitted through burning more fossil fuels needs to be avoided as the cumulative effects of more emissions are well documented.

The GHG emissions analysis provided in the Initial Project Description has a myriad of problems and deficiencies that prevent understanding of the full scope of impacts, as outlined below.

Project Specific Analysis Required

The Initial Project Description outlines that operational GHG emissions are modelled and presented on an annual and cumulative basis at a system level, rather than on the basis of this individual project (IPD 5-19). The fact that modelled operational GHG emissions are presented on an annual and cumulative basis on a system level for the entirety of the proponents operations, does not negate the need for a project specific GHG analysis. The GHG emissions impacts of this particular project over the entire lifecycle of the project should be clearly laid out, as is required by the [Information and Management of Time Limits Regulations](#).

Decommissioning Emission Omitted

The Initial Project Description does not contain information about GHG emissions associated with the decommissioning of the proposed project. To adequately assess the potential impacts of the project, emissions data associated with decommissioning needs to be included.

More Data for Project Construction Lifecycles Emissions Required

The information provided with respect to the lifecycle emissions from construction is not adequate. The proponent has estimated lifecycle GHGs from construction on a “high-level” based on a literature review. The proponent claims that detailed project specific data will be provided at a later date as part of the provincial assessment process (IPD 5-25). This is not adequate. This information should have been included in the project description as is required by the *Information and Management of Time Limits Regulations*.

Operational Emissions Beyond 2035 Are Excluded

The Initial Project Description provides no information about operational emissions beyond 2035, on the basis that a regulated net-zero grid will be in place beyond 2035 (IPD 5-19). This is completely nonsensical. The existence of a net zero grid does not stop the emissions from being created. They are simply offset by other activities, but offsetting does not break the association between the project and the emissions created by that project. Therefore ignoring emissions after 2035 does not adequately meet the regulatory requirement to provide an “estimate of any greenhouse gas emissions associated with the project.” There also needs to be details about how this offsetting will be achieved. A vague statement that “strategies in the form of offsets or other environmental commodities may be employed to satisfy the net-zero grid requirement” (IPD 5-22) beyond 2035 provides little information. Offsets may be a mitigation strategy in some circumstances, but if offsets are to be used then a reasonably detailed plan regarding the particular offsets or other environmental commodities that are anticipated needs to be included in the Initial Project Description. It is not enough for a proponent to merely say “trust us, we will figure out some offset or other environmental commodity strategy in the future” as Manitoba Hydro is doing here. For the Agency (or anyone else) to be able to assess the viability of offsets as a mitigation strategy requires an estimate of the total lifecycle emissions created by the project, so one can assess the volume of offsets that would be required to be purchased. It also requires a clearly articulated plan for what offset strategies will be pursued so the viability of the offset strategy as well as its ability to have capacity to handle offsetting the lifecycle emissions of the project. The project has an anticipated in-service date of 2030, an anticipated

economic lifecycle of 30 years, and operations of 50 years or more is possible. Stopping the analysis at 2035 (after less than 5 full years of operation) therefore only captures a small proportion (one-sixth to one-tenth or less) of the total operational emissions associated with this project (i.e. emissions created through the burning of fossil fuels to generate electricity). Including a short time frame of five years, rather than a longer and more appropriate timeframe of 30 years (or even 50 years), distorts the presentation of the lifecycle emissions presented (see Figures 5-8, 5-9, 5-10, and 5-11). By using such a short timeframe, most if not all of the construction related emissions are captured, but very little of the operational emissions are captured as these would continue on in each year throughout the entirety of the 30 years or more of operation.

Model Prefers Operation of Older Turbine First

The GHG modelling in the Initial Project Description has the existing older combustion turbines as the first source of energy. No explanation is provided as to why older turbines would be used as a primary source of energy and new, presumably more efficient, turbines would have the limited role of topping up energy needs. This allows for potentially misleading GHG figures for this project (see the Initial Project Description, Figure 5-5 and Table 5-7 [IPD 5-24]). At the very least, it appears the GHG impacts of the project are being understated or incompletely captured. This has the effect of lessening the emissions attributable to the Project. The entire emissions from this project should be ascribed to this project, regardless of which turbines are used.

Utilization Rate May Be Underestimated

As acknowledged by the proponent, the operational GHG emissions are also very sensitive to the utilization factor, or what proportion of time the turbines will be in operation over a period of time. Under typical conditions the proponent claims the project will operate at a utilization factor of between 0.5% and 5% (IPD 5-23). In the event that hydraulic inflows, similar to the lowest hydraulic flows on record, occur for 5 consecutive years, the utilization factor is modelled to be as high as 18.86% (IPD 5-23). This may be relatively unlikely as noted by the proponent, but climate change is making extreme weather events more and more frequent, so the possibility cannot be totally discounted. It is also possible that 0.5% to 5% may understate the reality. While acknowledging that other jurisdictions' grids are different than Manitoba's, it seems worth noting that natural gas peaker plants have an average utilization factor of [10% to 20% in Ontario](#) and [13% in the U.S.](#). The proponent may be underestimating the utilization factor (UF), and changes in the actual UF can significantly change emissions. Using the operating GHG emission intensity calculation of 532 kgCO₂e/MWh from the IRP ([Appendix 6, pg 21](#)), assuming a 0.5% utilization factor (UF) annual emissions would be about 17,336 t CO₂e per year (or 520,091 over 30 years of anticipated operation), at 2.75% UF it would increase to 95,350 t CO₂e per year (or 2.86 kt CO₂e over 30 years), at 5% UF it increases to 173,364 t CO₂e per year (or 5.2 kt CO₂e over 30 years), and at 20% UF annual emissions would be 693,455 t CO₂e per year (making it the largest single point source emitter in the province), with cumulative 30-year emissions totalling 20.8 kt CO₂e.

MW	Utilization factor	Hours/year	MWh	kg CO ₂ e per year	t CO ₂ e per year	Cum. t CO ₂ e over 30 years
744	0.50%	43.8	32,587.20	17,336,390.40	17,336.39	520,091.71
744	2.75%	240.9	179,229.60	95,350,147.20	95,350.15	2,860,504.42
744	5%	438	325,872.00	173,363,904.00	173,363.90	5,200,917.12
744	10%	876	651,744.00	346,727,808.00	346,727.81	10,401,834.24
744	20%	1752	1,303,488.00	693,455,616.00	693,455.62	20,803,668.48

Hours in year: 8,760.00

Emissions intensity: [532.00](#) kg CO₂e/MWh ([Appendix 6, pg 25](#))

Given the regulatory requirement for an estimate of the GHG emissions associated with the project, and the inadequacy of the GHG estimates and modelling in the Initial Project Description as outlined above, the proponent should be required to resubmit information that meets the regulatory requirements.

Air Pollution

There are serious concerns about the usefulness of the air quality data that was relied upon in section 3.6.1 of the Initial Project Description (IPD 3-6). The Brandon monitoring station only provided data with respect to Nitrogen Dioxide (NO₂), Sulfur Dioxide (SO₂). Because ambient concentrations of carbon monoxide (CO) are not measured at the Brandon Station measurements from the Winnipeg Ellen Street monitoring station were used to determine the baseline CO concentrations. Likewise the Scotia Street monitoring station in Winnipeg measurements of particulate matter were used to establish a baseline, particulate matter measurements in 2025 were excluded as the wildfire season made them outliers, and data from Brandon Station for particulate matter from 2021 to 2024 was either entirely missing or largely incomplete. Given the inconsistency of the data and the difference in collection location (Winnipeg being more than 200 km to the east of Brandon) the data should not be used as evidence to support the approval of the proposed project. Manitoba Hydro could have consulted citizen-collected data through [PurpleAir.com](#) or better yet they should have outsourced an independent study of air quality in Brandon near the proposed project area to obtain credible baseline data.

Consideration of Alternative Options Required

In accordance with section 3 of the [Information and Management of Time Limits Regulations](#), information for the initial description of a project must include current and representative information, and must “include the information related to any option that the proponent is

considering in respect of any item in the description of the project.” The Initial Project Description does not meet this regulatory standard.

MbEN submits that meeting this standard requires a proper need for and alternatives to (NFAT) analysis, and furthermore that the IPD does not meet this standard. A proper NFAT analysis requires consideration of doing nothing. Even if the do-nothing scenario is not viable or feasible it still serves to provide a bookend scenario for analytical purposes. Manitoba Hydro however refuses to consider a “do nothing” scenario (IPD 5-19). Manitoba Hydro generally avoids discussing alternatives to the project, instead focusing more on alternative means of carrying out the project (IPD 2-28), or alternative locations (IPD 2-29). We submit this is not adequate as it does not highlight other less impactful options that may be available.

We feel that other options such as energy demand shifting, enhanced energy efficiency, and further wind and solar in conjunction with grid scale battery energy storage offer opportunities that are not being considered by the proponent. The ongoing review by the Manitoba PUB of the proponents IRP and MNF will provide opportunities to investigate this further. For example MbEN has recently filed an affidavit from Jason Rioux, Chief Development Officer at NRStor, one of the leading battery storage developers in Canada as part of the review of the IRP and MNF by Manitoba’s PUB which outlines some of the ways that Manitoba Hydro may be overestimating the costs and obstacles to pursuing battery energy storage in Manitoba.

Even options that are clearly being considered by the proponent are not adequately addressed in the Initial Project Description. The proponent claims there will be the option to convert the simple cycle turbines to combined cycle turbines, and for alternative fuel integration (IPD 2-25), but no further information is provided as to how those considered options will be achieved. And this is contradicted by statements elsewhere in the IPD that alternative fuels are “[n]ot feasible due to limited fuel supplies in Manitoba and challenging or uncertain logistics in fuel procurement” (IPD 2-34). If alternative fuel and carbon sequestration are not feasible options, then this also likely means achieving net-zero through offsets is also not feasible.

All of this highlights that the proponent has not met its regulatory burden of outlining “any option that the proponent is considering”. MbEN recommends that the impact assessment of the proposed project be paused until after the PUB hearings conclude.

Conclusion

Thank you for considering the feedback of MbEN on the Initial Project Description for the Brandon Dispatchable Capacity Project. MbEN recommends that this project be subject to a full federal impact assessment due to the potential for adverse effects within numerous areas of federal jurisdiction. We have also outlined a range of additional reasons for federal involvement in the impact assessment process of this project, including significant gaps in information on the public record and the potential for provincial bias as Manitoba Hydro is an important Crown Corporation. We do not support a substituted process under the Manitoba/Canada Cooperation Agreement, but recognize the potential for a harmonized assessment that would require that the standards of both provincial and federal impact assessment statutes are met.

MbEN also recommends the impact assessment of the Brandon Dispatchable Capacity Project be paused until the completion of the provincial Public Utilities Board proceedings related to Manitoba Hydro's Integrated Resource Plan and Major New Facilities applications, as both of these processes could have direct implications for the proposed project and could result in changes to the baseline information on which the Initial Project Description is based.

We welcome future opportunities to engage with the Impact Assessment Agency of Canada to ensure the highest level of environmental and health protection measures are implemented for the benefit of current and future generations.

Sincerely,

James Beddome, Executive Director

Heather Fast, Policy Advocacy Director