



Minister of Environment and Climate Change

Minister responsible for Efficiency Manitoba

Legislative Building, Winnipeg, Manitoba R3C 0V8 CANADA

August 28, 2026

Alexis Kanu
alexis@lakewinnipegfoundation.org

Dear Alexis Kanu:

I am writing in response to your appeal of the Director's decision to accept the City of Winnipeg's North End Water Pollution Control Centre (NEWPCC) Upgrade Plan Update and Design and Construction Schedule as an updated compliance plan under Environment Act Licence No. 2684 RRR.

After careful consideration, I have decided to dismiss the appeal in accordance with section 27(2)(d) of The Environment Act. In reaching this decision, I reviewed all matters raised in the appeals received. My reasons are outlined below.

As a preliminary matter, I considered the scope of the Director's decision. The decision under appeal did not amend the existing Environment Act licence, change the applicable effluent limits, or remove the City's obligation to achieve compliance with those limits. Rather, the decision was limited to determining whether the City's updated compliance plan represented an acceptable pathway for achieving the existing licence requirements. Those requirements remain unchanged.

A key concern raised in the appeal was whether the City should be required to increase use of the chemical phosphorus-removal system installed in 2024 to achieve greater phosphorus reductions while the plant upgrade is being completed. While the interim phosphorus-removal system remains operational and continues to reduce phosphorus discharges, information before the Director indicated that increased chemical treatment would also increase sludge production and create additional operational demands for the treatment plant. In assessing the updated compliance plan, the Director considered the performance and reliability of the treatment system as a whole, rather than focusing solely on phosphorus removal, and concluded that the approved compliance plan represents the most reliable pathway to achieving long-term compliance with the full suite of licence requirements.

The appeal also raised concerns about continued phosphorus discharges to Lake Winnipeg, project delays, accountability and the extension of the anticipated compliance schedule from 2030 to 2032. The department recognizes the importance of reducing phosphorus inputs to Lake Winnipeg and the accepted compliance plan does not remove the requirement to achieve the licence limits. In evaluating the updated schedule, the Director reviewed constructability assessments and market analyses, which indicated that alternatives intended to achieve completion by 2030 carried substantially greater procurement, construction, cost, and scheduling risks. The Director concluded that the accepted schedule provides the greatest likelihood of successful project completion and achieving the licence requirements. The City remains subject to ongoing project milestones, reporting obligations and enforcement under The Environment Act.

Questions were raised regarding the delay in posting the Director's decision to the Public Registry and whether this affected the ability of interested persons to exercise their appeal rights under The Environment Act. I considered this issue in reaching my decision. While the posting occurred after the decision was issued, the information before me does not indicate that the delay impaired the appeal process or affected the Director's consideration of the compliance plan. I note that 100 appeals were received with respect to the decision, demonstrating that affected persons were able to bring their concerns forward through the appeal process.

Having considered the matters raised in the appeal, I am satisfied that the Director reasonably concluded that the City's updated Upgrade Plan and Design and Construction Schedule provides an acceptable pathway toward achieving the existing licence requirements. For these reasons, I find that the Director's decision was reasonable and dismiss the appeal.

I appreciate the time you took to raise your concerns and to participate in the environmental review process.

Kind Regards,

A handwritten signature in blue ink, appearing to read 'Mike Moyes', with a stylized flourish at the end.

Honourable Mike Moyes
Minister of Environment
And Climate Change