

THE KING'S BENCH
Winnipeg Centre

BETWEEN:

THE CITY OF WINNIPEG,

applicant,

- and -

**CAMBRIA HARRIS, KASYN RAPKE, MELISSA (NORMAND) ROBINSON,
GEORGE ROBINSON, TRE LENNOX DELARONDE, JOSEPH ALEXANDER
MUNRO, JOHN DOE, JANE DOE, and OTHER UNKNOWN INDIVIDUALS,**

respondents.

FILED JUL 11 2023

AFFIDAVIT OF MICHAEL GORDICHUK
Affirmed: July 11, 2023

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[File No. CL.1-2022 (249)]

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AFFIDAVIT OF MICHAEL GORDICHUK

I, MICHAEL GORDICHUK, of the City of Winnipeg, in the Province of
Manitoba, employee of the City of Winnipeg,

AFFIRM AND SAY THAT:

1. I am employed as the Manager of Solid Waste Services, a division of the Water and Waste Department for the City of Winnipeg, which is a municipal corporation (the "City"). As such, I have personal knowledge of the facts and matters hereinafter deposed to by me, except where same are based on information and belief, in which case I verily believe them to be true.
2. Part of my role is to oversee the operation of The Brady Road Resource Management Facility ("Facility").

The Brady Road Resource Management Facility

3. The Facility is owned and operated by the City.
4. The Facility is located at 1777 Brady Road, south of the Perimeter Highway and west of Pembina Highway. The site is bordered by the Perimeter Highway on the North, Waverley Street on the East, Brady Road and the Rural Municipality of Macdonald on the West, and Rue des Trappistes on the South. To enter the Facility, customers must turn onto Ethan Boyer Way from Waverley Street, continue approximately three kilometres (3 KM) to Brady Road and approximately one kilometer (1 KM) to the entrance of the Facility. Attached as **Exhibit A** is an aerial view of the Facility.
5. Although the roadway connecting Waverley Street to the Facility (Ethan Boyer Way and Brady Road) is owned by His Majesty the King, the City has possession and control of the roadway in accordance with sections 136 to 138 of the *City of Winnipeg Charter*.
6. The Facility operates pursuant to Manitoba *Environment Act* Licence No. 3081 R issued by the Province of Manitoba ("Licence"). The Licence prescribes obligations on the City including policies and practices for compliance with the Manitoba *Environment Act* and other related legislation. Attached as **Exhibit B** is a copy of the Licence.
7. At the Facility, there is a 4R Recycling Depot ("the 4R Depot") for residential customers, and a landfill for commercial and residential waste ("Landfill").

8. The Facility is typically open every day except January 1 (New Year's Day), November 11 (Remembrance Day) and December 25 (Christmas Day).
9. Each day, there are approximately 30 to 40 City employees and contractors working at the Facility, whose duties include operating heavy equipment, weighing materials brought to the Facility, processing solid waste, conducting water and air testing, operating and monitoring the Landfill methane gas flair, facilitating leachate removal, and other operations.
10. The 4R Depot is open to residential customers to dispose of solid waste of various kinds, including garbage. There are two other 4R Recycling Depots operated by the City, but the other two do not accept garbage.
11. The Landfill operates an essential service to Winnipeg residents and businesses. The Landfill is the City's only active landfill and the largest landfill in Manitoba.
12. The City has solid waste collection contracts with a number of contractors ("Contractors") to collect and dispose of solid waste from Winnipeg residences. Contractors typically dispose of collected materials at the Landfill on a daily basis. The Landfill is also open to other commercial users.
13. The Landfill receives approximately 1,000 to 1,500 metric tonnes of waste per day and approximately 400,000 metric tonnes per year.
14. Garbage received at the Landfill is deposited in a "cell". Generally, cells are large excavations where a base layer is prepared over time, material is

deposited and compacted. There is generally one cell active at any given time, and the cell known as "Cell 33" is currently active.

15. The construction of Cell 34 is underway and Cell 34 is expected to be active later this year. Attached as **Exhibit C** is the site plan of the Facility.

Safety Sensitive Operations

16. In addition to collecting, sorting and processing solid waste, the operations at the Facility include extensive environmental health and safety activities. In compliance with the Licence and the Facility Operating Plan, the City conducts a number of periodic activities, including, but not limited to:

- a. daily capturing and burning (or "flaring") toxic methane, sulfate and silicate gases released from decomposing waste in the Landfill;
- b. daily capturing and transporting toxic leachate (contaminated liquid) to one of the City's water treatment facility for treatment;
- c. periodic ground and surface water, and air monitoring and sampling;
- d. periodic nuisance management to reduce odours, litter and vectors;
- e. periodic rotation of compostable material to prevent combustion;
- f. periodic excavation of dedicated pits for dead animals and other types of special waste; and

- g. periodic planting of trees and shrubs on the berms along the Facility and relocating barriers located around the Facility.

17. If the City is unable to access and operate the Facility, there are significant environmental and health and safety risks, including, but not limited to:

- a. combustion of waste materials;
- b. excess buildup of toxic gases;
- c. excess buildup and/or leaking of toxic liquids;
- d. increased odours, littering, and vectors present at the Facility; and
- e. inability to conduct necessary water, air and other testing, investigation and mitigation measures.

18. In addition, if the City is unable to operate the Facility:

- a. the City will have to divert solid waste to other landfills;
- b. Winnipeg residents and commercial customers have to travel outside of the City to dispose of any solid waste materials that cannot be processed at the other 4R Winnipeg Depots;
- c. customers who need to dispose of specified risk materials ("SRM"), including diseased animals have to travel nearly 250 KM to Souris, Manitoba, the location of the only other landfill in Manitoba licensed to receive and process SRM;
- d. the City will incur expenses of approximately \$41,000 per day for tipping fees on diverted waste;

- e. the City will lose potential revenue of approximately \$37,000 per day in tipping fees and revenue on recyclable materials;
 - f. the City may have to reduce its residential collection services, including residential yard waste;
 - g. the City's employees and independent contractors may not be able to report for work, potentially impacting the City's contractual relationships with its workers; and
 - h. the City will be at risk of violating the Licence.
19. Since other landfills in Manitoba are smaller than the Brady Road Facility, it is likely that they cannot sustain extended diversion of the City's solid waste.
20. If at any time, other landfills refuse to accept diverted waste, the City will not have a place to dispose of its solid waste, which could within a matter of days delay or halt residential collection, lead to City-wide illegal dumping, pest control issues, civil unrest, and other health and safety issues.

Human Remains at the Facility

21. In May 2022, partial remains of an Indigenous woman, Rebecca Contois were discovered in the 200 block of Edison Avenue in Winnipeg. Shortly after, Jeremy Skibicki was charged with first degree murder of Contois.
22. In June 2022, the Winnipeg Police Service ("WPS") recovered additional partial remains of Contois at the Landfill in Cell 32.

23. After discovering Contois' remains at the Landfill, the City ceased operations in Cell 32 and transitioned its garbage operations to Cell 33.
24. On December 1, 2022, the WPS issued a news release advising that it charged Skibicki with first degree murder of three additional Indigenous women, Morgan Harris, Mercedes Myran, and another unknown woman referred to as Mashkode Bizhiki'ikwe (Buffalo Woman). Attached as **Exhibit D** is a copy of the WPS news release from December 1, 2022.
25. Also around that time, the WPS acknowledged publicly that the remains of Morgan Harris and Mercedes Myran were likely located at the Prairie Green Landfill ("PG Landfill"), but it did not search the PG Landfill as part of its homicide investigation. The PG Landfill is located in Stony Mountain, Manitoba, and is owned by Waste Connections Canada ("PG Landfill").
26. Based on discussions between City employees and representatives from Waste Connections Canada who operate the PG Landfill, I verily believe that Waste Connections Canada transitioned its operations to a different area at the PG Landfill.

Prior Blockades at the Facility

27. On December 11, 2022, some of the Respondents attended and conducted protests near the Facility and blocked roadway access to the Facility. Attached as **Exhibit E** is a copy of an article from the Winnipeg Free Press

on December 11th related to the blocked access and a photo posted on the Facebook page of Joseph Alexander Munro.

28. Based on observations by City employees at the Facility, and related social media activity, I verily believe that in the afternoon on December 13 and 14, 2022, some of the Respondents including, Tre Lennox Delaronde, Joseph Alexander Munroe, Cambria Harris and Melissa (Normand) Robinson attended near the Facility and caused or encouraged a blockade on the roadway at Brady Road. Attached as **Exhibit F** is a photo posted on Facebook showing several Respondents blocking the roadway near the Facility.
29. Due to the blockade, several Contractors and commercial customers traveling in large vehicles were lined up and unable to turn around on Brady Road. This necessitated City employees to guide the trucks back approximately 300 meters to the entrance of the Facility equipment storage building, where the drivers could turn around to exit Brady Road.
30. Thereafter, due to the blockade and concerns with safe access to and from the Facility, I authorized the closure of the Facility. The City notified customers via signage at Ethan Boyer Way and Waverley Street, and diverted waste to other landfills.
31. Based on observations by City employees at the Facility, I verily believe that on December 16, 2022, some of the Respondents attended near the Facility and caused interruptions to roadway access to the Facility. Due to concerns

with safe access to and from the Facility, I authorized the diversion of solid waste to alternate landfills outside of Winnipeg.

32. In the afternoon on December 18, 2022, some of the Respondents including Joseph Alexander Munro attended near the Facility and blocked roadway access to the Facility. As a result, I authorized the closure of the Facility.
33. On most occasions, after a closure of the Facility, to avoid any confrontation or escalation, City employees and contractors exited through an emergency access to the Facility. The emergency access is not suitable for customer traffic or large vehicles.
34. On December 23, 2022, representatives from the City took over 20 guests, including family members of Morgan Harris and Mercedes Myran for a tour of the Facility. The City also provided education related to the Facility operations and confirmation that the City was no longer operating in Cell 32. Also, the guests participated in a smudging ceremony near Cell 32.
35. Between the period of December 18, 2022 and January 5, 2023, me or other City employees observed and I verily believe that some or all of the Respondents stood in the roadway, formed a blockade using vehicles, a tent or other similar structures, and other objects, or otherwise supported the blockade at Brady Road preventing traffic to and from the Facility.

36. During this time, the Facility was closed and the residential waste collected by the Contractors was diverted. The City was able to negotiate with some of the Respondents to permit the City to access and remove leachate from the Facility. Also, City employees were able to access the Facility via the emergency access to attend to other safety sensitive operations.
37. On January 5, 2022, City representatives had discussions with Indigenous stakeholders to facilitate clearing the blockade. Later that day, the City received confirmation that the blockade would be cleared to permit the Facility to open on January 6, 2023.
38. On January 6, 2022, operations at the Facility resumed. Some of the Respondents remained on City lands near the Facility and maintained an encampment near the Facility, which was named Camp Morgan. The encampment has continued to date, and several Respondents, including Joseph Alexander Munroe, Cambria Harris, Tre Lennox Delaronde, Melissa (Normand) Robinson, and George Robinson have maintained an ongoing presence at the encampment.
39. Aside from initial disputes between some of the Respondents and customers accessing the Facility, there were no major issues impacting the ongoing operation of the Facility until April 2023, when the remains of Linda Beardy were discovered at the Landfill.

40. On or about April 3, 2023, the Facility was closed temporarily and remained closed until April 10, 2023. During this time, some of the Respondents promoted a permanent shut down of the Facility.
41. The blockades caused or encouraged by the Respondents on Brady Road between December 13, 2022 and January 6, 2023 cost the City approximately \$1.5 Million, including lost revenue and out-of-pocket expenses. Attached as **Exhibit G** is a copy of an Administrative Report that the City's Public Service submitted to the Standing Policy Committee on Finance and Economic Development as information on April 28, 2023.
42. In addition, the City has incurred security and traffic related expenses of approximately \$600 per day or approximately \$125,000 this year.
43. Several Respondents have posted messages and videos on social media with information about the encampment and their activities at or near the Facility. Attached as **Exhibit H** is a sample of screenshots of the numerous social media posts about the blockade on the roadway at Brady Road and the encampment on nearby lands owned by the City.

The Feasibility Study

44. On or about December 14, 2022, the Federal government committed to fund a study to assess the feasibility of a potential search at the PG Landfill for the remains of the Indigenous women. The scope of the study did not

include a search at the Brady Landfill. Attached as **Exhibit I** is a CBC article regarding the funding commitment.

45. In or about May 2023, the feasibility study was completed. The report included a finding that a search is feasible, but cautioned considerable risks due to exposure to toxic chemicals and asbestos. The report also noted that if a search is conducted, a successful outcome is not guaranteed, and it could take 12 to 36 months and costs between \$84 Million and \$184 Million.
46. On or about July 5, 2023, Premier Heather Stefanson and Eileen Clarke, the Minister for Indigenous Reconciliation and Northern Relations issued a statement regarding the search for human remains at the PG Landfill. Attached as **Exhibit J** is a copy of the Manitoba news release.

Recent Blockade at Facility

47. In late June 2023, through social media, I became aware of the potential for another blockade on the roadway near the Facility. Attached as **Exhibit K** is a social media post on Twitter.
48. On July 6, 2023, some of the Respondents, including Tre Lennox Delaronde, set up, attended or encouraged a partial blockade on Ethan Boyer Way. I attended the blockade with members of the WPS' neutral police liaison team (PLT) to engage in a dialogue with the Respondents. Later in the day, some of the Respondents including Tre Lennox Delaronde, Melissa (Normand) Robinson, and Cambria Harris, attended, maintained or

encouraged a full blockade across the road on Ethan Boyer Way. Members of the WPS PLT again attended the blockade and spoke to some of the Respondents who declined to vacate the roadway. Attached as **Exhibit L** is a sample of photos and videos posted on Facebook on July 6th.

49. To mitigate against further interruption of the operations at the Facility, I authorized the construction of an alternative route to the Facility via Waverley Street and rue des Trappistes. However, the alternative route is not an all-weather road and is susceptible to precipitation. Despite the blockade, the Facility remained open on July 6th, as customers were able to access and exit through the alternative route.
 50. In the evening on July 6th it rained rendering the alternative route unusable. While leaving the Facility via the alternative route, two customers got stuck and City employees had to assist the customers to leave the Facility.
-
51. On July 7, 2023, with the alternative route unusable, and some of the Respondents continuing to block access to the Facility via Ethan Boyer Way, I authorized the closure of the Facility.
 52. I also authorized work to reinforce the alternative route to try to maintain operations and access to the Facility. To date, the cost of construction and maintenance of the alternate route is approximately \$124,000.
 53. In the afternoon on July 7th, the Chief Administrative Officer ("CAO") of the City issued a notice ordering the blockade on the roadway to be cleared

("Order"). I attended the blockade with the Director of the Water and Waste Department and members of the WPS PLT and attempted to serve the Order on the Respondents and others who were present. The Respondents would not accept the Order, so I left the Order on the ground near them and advised them of the Order to vacate the roadway by July 10th at 12:00 PM. Attached as **Exhibit M** is a copy of the Order.


54. Shortly thereafter, one or more of the Respondents started a fire and burned the Order and other materials on the roadway at Ethan Boyer Way. Attached as **Exhibit N** is a copy of video taken from the Facebook page Waabishkaa Ma'iingan Apiichaa showing the fire.
55. On July 8, 2023, the Facility reopened with access via the reinforced alternative route. Some of the Respondents continued the blockade at the roadway on Ethan Boyer Way.
56. Some of the Respondents, including Tre Lennox Delaronde and Cambria have informed me or stated in social media posts that the recent blockade on the roadway was initiated in response to Manitoba's decision to not support a search at the PG Landfill.
57. Despite statements in the media from some of the Respondents on July 8, 2023 that the blockade would be removed prior to the July 10th deadline, on July 9, 2023, a number of activities occurred which I interpreted as increasing activity and conflict near the blockade, including:

- a. the City's digital sign located near the intersection of Ethan Boyer Way and Waverley Street was flipped over;
- b. an unknown individual attended the blockade and dumped what appeared to be yard waste debris on the roadway and engaged in a heated exchange with Respondents at the blockade. Attached as **Exhibit O** is a screenshot of a video posted on Cambria Harris' Facebook page;
- c. unknown individual attended the Facility through the alternative route in a truck and yelled at customers to leave;
- d. the entrance sign for the Facility was defaced. Attached as **Exhibit P** is a photo of the sign;
- e. a post was made on the Facebook page of Kyra Wilson, the Chief of the Long Plain First Nation, soliciting support for Camp Morgan. Attached as **Exhibit Q** is a screenshot of the post; and
- f. the number of individuals present at the blockade was increasing.

58. On July 10, 2023, several Respondents attended and maintained a blockade on Ethan Boyer Way despite the Order and after the 12:00 PM deadline. Over the course of the day, several videos and photos were posted on social media showing larger numbers of individuals present, and more materials in the roadway on Ethan Boyer Way. Attached as **Exhibit R** is a sample of social media posts on July 10th.

59. In addition, the Assembly of Manitoba Chiefs and Chief Kyra Wilson issued a press release expressing disappointment with the City's efforts to clear the blockade. Attached as **Exhibit S** is copy of the press release.
60. Despite the City's attempts to clear the blockade on the roadway at Ethan Boyer Way, I believe that the Respondents will not leave the roadway unless the court intervenes and grants an injunction and permitting the Winnipeg Police Service to enforce the injunction.
61. I am concerned that if an injunction is not granted that the environmental, health and safety and financial risks outlined above herein may occur and the City will continue to suffer irreparable harm.
62. I make this affidavit bona fide.

Affirmed before me at the City of)
Winnipeg, Province of Manitoba,)
this 11th day of July, 2023)


_____)

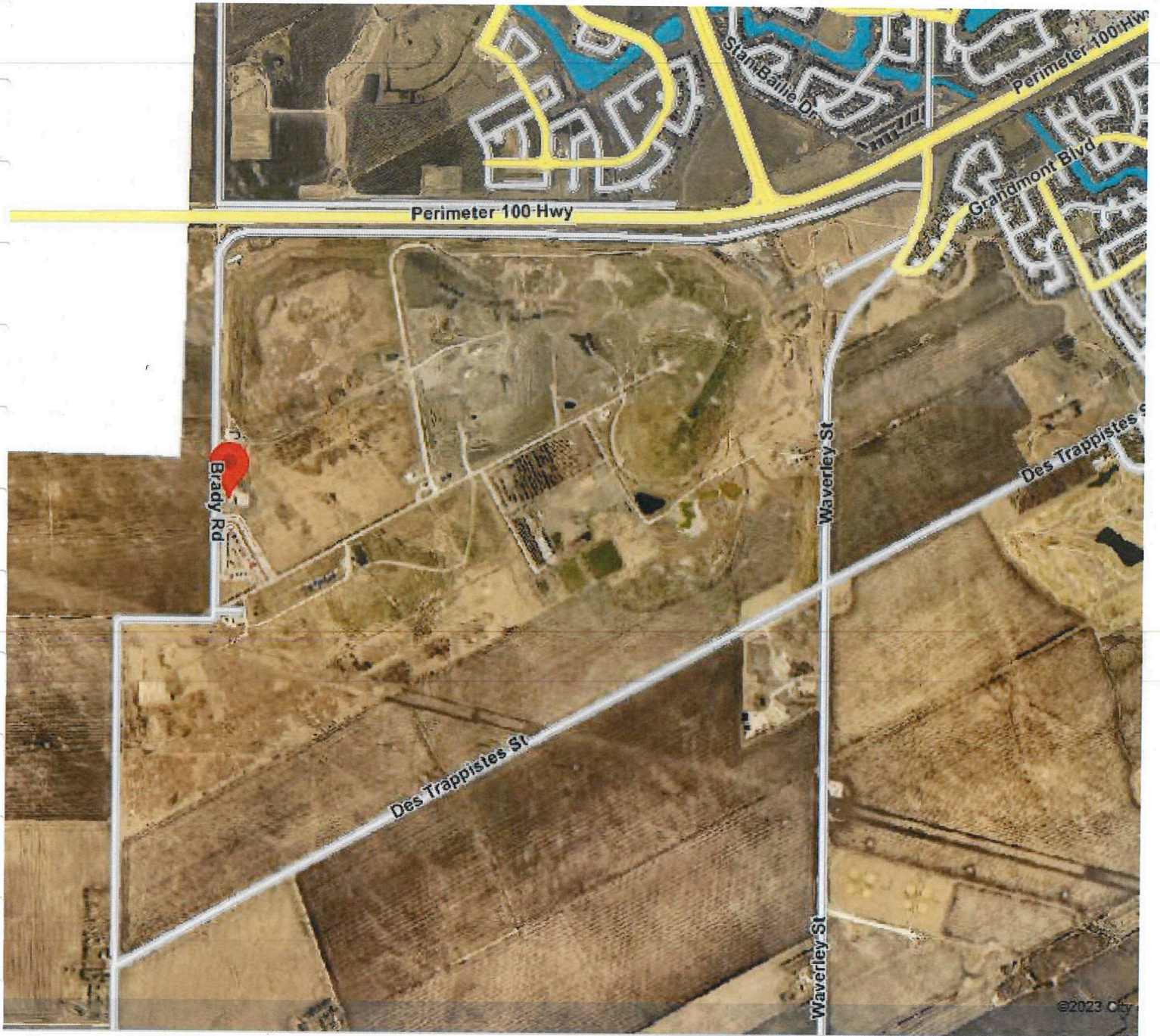

_____)

MICHAEL GORDICHUK

This is Exhibit "A" referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read "A. Sledge", is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba



This is Exhibit "**B**" referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read "A. Pledger", is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba

THE ENVIRONMENT ACT
LOI SUR L'ENVIRONNEMENT

LICENCE



Licence No. / Licence n°

3081 R

Issue Date / Date de délivrance

December 23, 2013

Revised :

April 23, 2014

In accordance with *The Environment Act* (C.C.S.M. c. E125) /
Conformément à la *Loi sur l'environnement* (C.P.L.M. c. E125)

Pursuant to Section 11(1) / Conformément au Paragraphe 11(1)

THIS LICENCE IS ISSUED TO: / CETTE LICENCE EST DONNÉE À:

THE CITY OF WINNIPEG, WATER AND WASTE DEPARTMENT;
"the Licencee"

for the construction and operation of the Development being a Class 1 Waste Disposal Ground and Resource Management Facility to be known as The Brady Road Resource Management Facility located at 1901 Brady Road in Winnipeg, Manitoba in accordance with the Proposal filed under *The Environment Act* on December 23, 2011, and subject to the following specifications, limits, terms and conditions:

DEFINITIONS

In this Licence,

"access road" means a road that leads from a Provincial Trunk Highway, Provincial Road, or a municipal road;

"accredited laboratory" means an analytical facility accredited by the Standard Council of Canada (SCC), or accredited by another accrediting agency recognized by Manitoba Conservation and Water Stewardship to be equivalent to the SCC, or be able to demonstrate, upon request, that it has the quality assurance/quality control (QA/QC) procedures in place equivalent to accreditation based on the international standard ISO/IEC 17025, or otherwise approved by the Director;

"active area" means a designated trench, cell, or berm confined area of a waste disposal ground in which solid wastes are deposited, also known as waste disposal cell or landfill cell;

"affected area" means a geographical area, excluding the property of the Development;

****A COPY OF THE LICENCE MUST BE KEPT ON SITE AT THE DEVELOPMENT AT ALL TIMES****

"all weather road" means a graded and/or graveled road or road of equivalent materials that is passable by vehicles under both wet and dry weather conditions;

"alternative daily cover" means materials approved by the Director for use in temporarily covering waste in an active area;

"approved" means approved by the Director or assigned Environment Officer in writing;

"background water quality" means the quality of water in any geologic zone monitored with regards to the chemical and microbiological parameters specified in a Licence issued pursuant to *The Environment Act* by the Director;

"biosolids" means accumulated organic solids, resulting from wastewater treatment processes, that have received adequate treatment to permit the material to be recycled;

"body of water" means any body of flowing or standing water whether natural or artificially created;

"buffer" means a strip of land that is managed to reduce or eliminate the impacts of land use practices on sensitive areas or natural features;

"bulky metallic waste" means, but is not limited to, derelict vehicles, farm machinery, and large appliances which are capable of being salvaged for recycling or reuse;

"CCME" means Canadian Council of Ministers of the Environment;

"cell" means the location where waste is deposited;

"Class 1 Waste Disposal Ground" means a waste disposal ground serving a population in excess of 5,000 persons;

"Closed Landfill" means the area identified as 'Closed Landfill' shown on the City of Winnipeg Brady Road Resource Management Facility Master Plan Proposed Development Map in Appendix 'C' of this Licence or identified as 'closed' as the status on the Brady Road Resource Management Facility Landfill Cell Location Plan in Appendix 'D' of this Licence or identified on updated closure plans as new areas are closed;

"closure plan" means a plan indicating the actions to be taken for the closure of the Development, or a portion of the Development;

"Community Resource Recovery Centre" means an area within the Brady Road Resource Management Facility that the public will have access to in order to deposit

small loads for segregating materials for recycling, reuse or repurposing and aggregating waste materials to be transferred to a tipping face;

"compliance boundary" means the planar surface that circumscribes the Development, extends vertically downward from the land surface, and constitutes the place at which the parameters of the background water quality as specified in a Licence issued pursuant to *The Environment Act* are not to be exceeded;

"component" means a landfill cell, pad or structure that forms a part of a process or system within an activity area of the Development;

"compost" means solid mature product resulting from composting;

"composting" means a managed process of bio-oxidation of a solid heterogeneous organic substrate including a thermophilic phase;

"concentration value" means a restriction established by a Licence issued pursuant to *The Environment Act* by the Director on quantities, discharge rates and concentrations of pollutants;

"condensate" means liquid created by condensing and removing gases from landfill gas;

"contaminant" means a contaminant as defined in *The Dangerous Goods Handling and Transportation Act*;

"cover material" means material which is non-flammable, does not interfere with landfill gas collection or extraction systems, does not biodegrade to produce landfill gas, is a deterrent to vectors, is free of roots, vegetation and frozen material, or is a material approved by the Director, that is used to cover compacted solid waste;

"CRRC" means Community Resource Recovery Centre;

"daily" means any 24-hour period;

"dangerous goods" means any product, substance or organism designated in the regulations, or conforming with the criteria set out in the regulations, or in any regulation adopted in accordance with *The Dangerous Goods Handling and Transportation Act*, and includes hazardous wastes;

"Director" means an employee so designated pursuant to *The Environment Act*;

"engineer(s)" means an engineer or engineers registered with the Association of Professional Engineers and Geoscientists of the Province of Manitoba;

"engineered wetland" means a designed and man-made system for treatment of impacted water or leachate composed of a basin containing soil at the bottom with emergent and submergent vegetation, animal life, and water that simulates natural wetlands;

"Environment Officer" means an employee so designated pursuant to *The Environment Act*;

"final cover" means earth compacted to a thickness of at least 0.5 metre applied to the surface of the compacted waste cell that has achieved the final elevation for cell closure, and is graded to minimize ponding of water on the surface;

"green waste" means leaf, grass, garden waste, prunings, shrubs, small branches and other yard wastes from residential and commercial generators as identified in the Leaf and Yard Waste Composting Facility and Pilot Biosolids Composting Facility at Brady Road Resource Management Facility document;

"groundwater" means water below the ground surface and within a zone of saturation;

"groundwater monitoring program" means a plan developed for the monitoring and management of groundwater;

"hazardous waste" means any substance or group of substances so designated by the regulations or conforming to criteria set out in regulations, or any future amendments thereof;

"HDPE" means high density polyethylene;

"hydraulic conductivity" means the quantity of water that will flow through a unit cross-sectional area of a porous material per unit of time under a hydraulic gradient of 1.0;

"industrial waste" means waste product generated by industry other than hazardous waste and liquid industrial waste;

"infill waste disposal cell" means an active area that is developed on top of or adjacent to a closed waste disposal cell to maximize use of the space available;

"landfill" see waste disposal ground;

"landfill gas" means a mixture of gases generated by the microbial decomposition and chemical reactions between wastes in a landfill;

"leachate" means liquid that has percolated through solid waste, and that contains dissolved and suspended materials from the solid waste;

"leachate collection system" means a system that gathers leachate so that it may be removed from a landfill and which could include a permeable drainage layer, a network of perforated piping, and sumps or manholes from which leachate can be removed;

"Leachate Management System" means all of the components of a system to transport, collect, and extract leachate from the Development; to include the leachate collection system, and any other infrastructure installed for the purpose of handling leachate;

"liner" means a continuous layer of reworked soil, or manufactured materials, placed beneath and on the sides of a waste disposal ground active area, a compost facility, or a storage area intended to restrict the downward or lateral escape of solid waste, leachate, and or gases, or to restrict the upward movement of groundwater into an area;

"liquid industrial waste" means waste generated by industrial processes that has a slump of more than 150 mm using the slump test method (slump test, C.S.A. Standards Test Method A 23.2-5C), and does not include hazardous waste or industrial waste;

"liquid waste" means sewage, sewage effluent and sludge from septic tanks, holding tanks and municipal sewage treatment systems and that has a slump of more than 150 mm using the slump test method (slump test, C.S.A. Standard Test Method A23.2-5C);

"mil" means one-thousandth of an inch;

"monitoring well" means a well drilled to measure groundwater levels and collect groundwater samples for the purpose of physical, chemical or biological analysis to determine the concentration of groundwater constituents;

"noise nuisance" means an unwanted sound, in an affected area, which is annoying, troublesome, or disagreeable to a person:

- a) residing in an affected area;
 - b) working in an affected area; or
 - c) present at a location in an affected area which is normally open to members of the public;
- if the unwanted sound
- d) is the subject of at least 5 written complaints, received by the Director in a form satisfactory to the Director and within a 90-day period, from 5 different persons falling within clauses a), b) or c), who do not live in the same household; or
 - e) is the subject of at least one written complaint, received by the Director in a form satisfactory to the Director, from a person falling within clauses a), b) or c) and the Director is of the opinion that if the unwanted sound had occurred in a more densely populated area there would have been at least 5 written

complaints received within a 90-day period, from 5 different persons who do not live in the same household;

"odour nuisance" means a continuous or repeated odour, smell or aroma, in an affected area, which is offensive, obnoxious, troublesome, annoying, unpleasant or disagreeable to a person:

- a) residing in an affected area;
- b) working in an affected area; or
- c) present at a location in an affected area which is normally open to members of the public;

if the odour, smell or aroma

- d) is the subject of at least 5 written complaints, received by the Director in a form satisfactory to the Director and within a 90-day period, from 5 different persons falling within clauses a), b) or c), who do not live in the same household; or
- e) is the subject of at least one written complaint, received by the Director in a form satisfactory to the Director, from a person falling within clauses a), b), or c) and the Director is of the opinion that if the odour, smell or aroma had occurred in a more densely populated area there would have been at least 5 written complaints received within a 90-day period, from 5 different persons who do not live in the same household;

"opacity" means the degree to which emissions reduce the transmission of light and obscure the view of an object in the background;

"particulate matter" means any finely divided liquid or solid matter other than water droplets;

"particulate residue" means that part or portion of an atmospheric emission which is deposited onto a surface;

"point source" means any point of emission from a Development where pollutants are emitted to the atmosphere by means of a stack;

"pollutant" means a pollutant as defined in *The Environment Act*;

"post-closure plan" means a plan indicating the actions to be taken for the care, maintenance, and monitoring of the Development after closure, that will prevent, mitigate, or minimize the threat to public health and the environment;

"QA/QC" means quality assurance/quality control;

"qualified professional" means an individual properly trained and authorized to practice in a specific area or field which may include assessment, design, or providing consultation for an aspect of the Development; to include but not be limited to Professional Engineers, Geoscientists or Landscape Architects;

"representative sample" means a sample collected by a methodology acceptable to an Environment Officer;

"Segregated Material Storage Area" means an area for accumulation and temporary storage of materials which have been segregated by type, composition or potential end use, e.g. metal and white goods, tires, glass etc., prior to utilization on site or transfer off site;

"site" means the area both permanent and temporary which is required for the construction and operation of the Development;

"solid waste" means all discarded waste including dead animals and does not include liquid waste, hazardous waste or bulky metallic waste;

"special waste" means bagged asbestos containing materials, dead animals including specified risk materials (SRM), slaughterhouse waste and food products deemed to be unacceptable by the Canadian Food Inspection Agency (CFIA), biosolids, and any other waste identified by the Director;

"Standard Methods for the Examination of Water and Wastewater" means the most recent edition of Standard Methods for the Examination of Water and Wastewater published jointly by the American Public Health Association, the American Water Works Association and the Water Environment Federation;

"Surface Water Management System" means a system that manages surface water and storm water from all areas, within the Development;

"surface water management feature" means an engineer designed element (pond, engineered wetland, drainage channel, etc.) that is included in the Surface Water Management System;

"top soil" means soil that is free of roots, vegetation, weeds and stones larger than 50 mm, is capable of supporting good vegetative growth, and is suitable for use in top dressing, landscaping and seeding;

"Wood Chip Processing and Storage Area " means an area for the receipt, chipping, and storage of wood waste, including Dutch elm disease impacted wood, prior to utilization on site or for transport off site, including but not limited to use as a compost bulking agent or feedstock; and

"waste disposal ground" means a parcel of land that is used for the disposal of solid or industrial waste, also referred to as a landfill.

PROJECT SCOPE

The Development is located within the area bordered by Waverley Street, Provincial Trunk Highway 100, Brady Road and Rue des Trappistes, also to include Parcels A, B, D and E of Plan 20197; individual parcels shown and legal descriptions in Appendix 'A' and Appendix 'B', attached.

Supporting documents and additional information for the Development, filed in accordance with *The Environment Act* include:

- a) Brady Road Resources Management Facility Operating Plan, dated December 2011, received February 3, 2012;
- b) Brady Road Landfill Methane Gas Abatement / Biofuel Plant Project, dated March 16, 2009;
- c) Landfill Gas Collection and Flaring System Design Brief, Brady Road Resource Management Facility, August 21, 2012;
- d) Notice of Alteration – Biosolids Composting Pilot Study Environment Act Licence No. 1089 E RR, January 5, 2012;
- e) City of Winnipeg Biosolids Composting Pilot Study, February 9, 2012;
- f) Leaf and Yard Waste Composting Facility and Pilot Biosolids Composting Facility at Brady Road Resource Management Facility; Draft Conceptual Design and Operations Report, received September 18, 2012;
- g) Winnipeg Water and Waste Department Pilot Biosolids Composting Facility Design Brief dated January 2013;
- h) Brady Environment Act Proposal: Proposed Development Plan and Landfill Cell Location Plan, received November 27, 2012; and
- i) Updated Brady Environment Act Proposal: Proposed Development Plan, received September 23, 2013.

GENERAL TERMS AND CONDITIONS

This Section of the Licence contains terms and conditions intended to provide guidance to the Licencee in implementing practices to ensure that the environment is maintained in such a manner as to sustain a high quality of life, including social and economic development, recreation and leisure for present and future Manitobans.

General Terms

1. The Licencee shall reduce the production and dissemination of wastes by initiating and maintaining waste reduction and waste recycling programs at the Development.

2. The Licencee shall organize, chair and participate on a Community Liaison Committee to be established according to the criteria identified in Appendix 'E' of this Licence.

Reporting Format

3. The Licencee shall provide to the Director, upon request, all information required under this Licence, in writing and in such form and content (including number of copies), as may be specified by the Director and each submission shall be clearly labelled with the Licence Number and File Number associated with this Licence.
4. The Licencee shall carry out any remedial measures, modifications, or alterations, as deemed necessary by the Director, in respect to matters authorized under this Licence.

Future Sampling

5. In addition to any of the limits, terms and conditions specified in this Licence, the Licencee shall, upon the request of the Director:
 - a) sample, monitor, analyse or investigate specific areas of concern regarding any segment, component or aspect of pollutant storage, containment, treatment, handling, disposal or emission systems, for such pollutants or ambient quality, aquatic toxicity, leachate characteristics and discharge or emission rates, for such duration and at such frequencies as may be specified;
 - b) determine the environmental impact associated with the release of any pollutants from the Development; or
 - c) provide the Director, within such time as may be specified, with such reports, drawings, specifications, analytical data, descriptions of sampling and analytical procedures being used, bioassay data, flow rate measurements and such other information as may from time to time be requested.

Sampling Methods

6. The Licencee shall, unless otherwise specified in this Licence:
 - a) carry out all preservations and analyses on liquid samples in accordance with the methods prescribed in the most current edition of Standard Methods for the Examination of Water and Wastewater or in accordance with equivalent preservation and analytical methodologies approved by the Director;
 - b) carry out all sampling of, and preservation and analyses on, soil and air samples in accordance with methodologies approved by the Director;
 - c) have all analytical determinations undertaken by an accredited laboratory; and
 - d) report the results to the Director within sixty (60) days of the samples being taken, or within another timeframe as specified by the Director.

7. The Licencee shall, unless otherwise specified in this Licence carry out all sampling of groundwater, surface water, leachate, soil, air and landfill gas in accordance with methodologies specified in the Operating Plan submitted pursuant to Clause 41 of this Licence.

Equipment Breakdown

8. The Licencee shall, in the case of physical or mechanical equipment breakdown or process upset or in cases where waste management functions are disrupted; where such breakdown or process upset results or may result in the release of a pollutant in an amount or concentration, or at a level or rate of release, that causes or may cause a significant adverse effect, immediately report the event by calling 204-944-4888 (toll-free 1-855-944-4888). The report shall indicate the nature of the event, the time and estimated duration of the event and the reason for the event.
9. The Licencee shall, following the reporting of an event pursuant to Clause 8,
 - a) identify the repairs required to the mechanical equipment;
 - b) undertake all repairs to minimize unauthorized discharges of a pollutant;
 - c) complete the repairs in accordance with any written instructions of the Director; and
 - d) submit a report to the Director about the causes of breakdown and measures taken, within four (4) weeks of the repairs being completed.
10. The Licencee shall implement a high standard of equipment maintenance and good housekeeping and operational practices with respect to the Development, at all times.

Fire Reporting

11. The Licencee shall in the event of a fire which continues in excess of thirty (30) minutes, or requires implementation of the Emergency Response Plan in Clause 130, or requires fire suppression assistance from personnel outside of the Development (e.g. fire department) report the fire by calling (204) 944-4888 (toll free 1-855-944-4888), identifying the type of materials involved and the location of the fire.

Approvals and Permits

12. The Licencee shall locate fuel storage and equipment servicing areas established for the construction and operation of the Development in compliance with the requirements of *Manitoba Regulation 188/2001* respecting *Storage and Handling of Petroleum Products and Allied Products* or any future amendments thereof.
13. The Licencee shall obtain approval in writing from the Director for any proposed alteration to the Development before proceeding with the alteration.

SPECIFICATIONS, LIMITS, TERMS AND CONDITIONS

Odours and Air Emissions

14. The Licencee shall not burn waste or combustible materials, or allow the burning of waste or combustible materials at the Development unless approved by the Director.
15. The Licencee shall not cause or permit an odour nuisance to be created as a result of the construction, operation, or alteration of the Development, and shall take such steps as the Director may require to eliminate or mitigate an odour nuisance.
16. The Licencee, upon written request of and in a timeframe stipulated by the Director, shall comply with any air emission or ambient air quality criteria specified by the Director for any pollutant of concern to the Director which has been identified pursuant to Clauses 5 or 108 of this Licence.
17. The Licencee shall take action to minimize the entrainment of particulate matter into the air at the Development resulting from the operation of vehicles or the transportation, storage or handling of compost feedstock, wood wastes, construction and demolition waste or other materials.

Noise

18. The Licencee shall not cause or permit a noise nuisance to be created as a result of the construction, operation, or alteration of the Development, and shall take such steps as the Director may require to eliminate or mitigate a noise nuisance.

Responsible Party

19. The Licencee shall assign an engineer(s) or a qualified person(s) to be responsible for the construction of the Development and any required remediation action in accordance with the plans, specifications and design report(s) submitted in support of the proposal or this Licence.
20. The Licencee shall designate an employee, within sixty (60) days of the date of issuance of this Licence, as the Licencee's Environmental Coordinator, whose job description will include assisting the Licencee in complying with the limits, terms and conditions in this Licence and assisting Senior Management of the Licencee to manage environmental issues at the Development. The name of the Environmental Coordinator shall be submitted in writing to the Director within fourteen (14) days of appointment.

Landscaping Plan

21. The Licencee shall submit to the Director, within one (1) year of the date of this Licence, a Landscaping Plan that includes information respecting the establishment of physical and visual buffers from the operations at the Development to adjacent properties. This plan shall include but not be limited to: construction of berms, tree plantings, vegetation of exposed soils, landscaping and timeframes for completion of each component of the plan.
22. The Licencee shall implement the Landscaping Plan as submitted pursuant to Clause 21 of this Licence.

Construction

23. The Licencee shall, prior to initiating any construction at the Development, submit two paper copies and one electronic copy of final engineering design plans, sealed by an engineer(s), to the Director. The plans will show the engineering details of each new component and the location of each new component with respect to other components.
24. The Licencee shall construct the Development in accordance with the design plans submitted to the Director pursuant to Clause 23 of this Licence.
25. The Licencee shall, to facilitate inspection of the Development during construction and operation, provide such access as the Director deems necessary, to an Environment Officer throughout the duration of construction and operation of the Development.

Site Preparation

26. The Licencee shall, prior to any new construction of any component of the Development, remove all top soil to a minimum depth of 150 mm and store this top soil at a suitable location for future use.

Clay Components of the Development

27. The Licencee shall, where a component of the Development is to be constructed with a clay liner; construct the liner underlying the component as described in Clauses 28 to 31 of this Licence. For any component of the Development that is to be constructed with scarified in situ clay, the component shall be subject to Clauses 28 b), and 29 to 31 of this Licence.
28. The Licencee shall construct and maintain all clay lined component(s) of the Development in accordance with the following specifications:
 - a) the clay liner is recompacted to a minimum thickness of one (1) metre for the side slopes and for the base;

- b) the hydraulic conductivity of the clay is 1×10^{-7} cm/second or less;
- c) the liner extends a vertical distance of one (1) metre above normal operating level for any leachate storage component other than a landfill cell liner; and
- d) the clay liner is installed under the entire base and side wall or berm of any waste containment cell(s).

29. The Licencee shall arrange with an Environment Officer a mutually acceptable time and date for any required soil sampling between the 15th day of May and the 15th day of October of any year, unless otherwise approved by an Environment Officer.

30. The Licencee shall take and test undisturbed soil samples, in accordance with Appendix 'H' attached to this Licence, from:

- a) the clay of new waste disposal cell(s);
- b) the clay of the compost pad(s) and compost leachate pond, if applicable;
- c) leachate treatment wetlands; and
- d) any clay component of the Development requiring testing by the Director.

The number and location of samples and test methods will be specified by an Environment Officer up to a maximum of twenty (20) samples per cell, pond, compost pad or clay component of the Development.

31. The Licencee shall, prior to operation of the area tested in accordance with Clause 30, receive the approval of the an Environment Officer for the results of the tests carried out pursuant to Clause 30 of this Licence.

Synthetic Lined Components of the Development

32. The Licencee shall, where a component of the Development is to be constructed with a synthetic HDPE liner; construct the liner underlying the component as described in Clauses 33 to 37 of this Licence and establish that the synthetic material is compatible with landfill leachate.

33. The Licencee shall construct and maintain a continuous liner underlying the component of the Development, such that:

- a) the liner is constructed from HDPE geomembrane;
- b) the liner has a minimum thickness of 60 mil;
- c) all sections of the liner are joined by double channel fusion seaming;
- d) the liner is installed under the entire base and side wall or berm of any waste containment cell(s);
- e) in accordance with ASTM Standard D-4437, the integrity of all field seams are tested by non-destructive test methods, a testing report is prepared and submitted to an Environment Officer within 30 days of commencing the installation of the liner; and
- f) the liner is secured to prevent lifting of the liner.

34. The Licencee shall complete the installation of the synthetic liner on any component at the Development in accordance with manufacturer recommendations regarding temperature and environmental conditions. Installation shall be completed between the 15th day of May and the 15th day of October of any year, unless otherwise approved by an Environment Officer.
35. The Licencee shall not cover the synthetic liner or use a synthetic lined component of the Development until receiving written approval of the report submitted pursuant to sub-Clause 33 e) of this Licence from an Environment Officer.
36. The Licencee shall notify an Environment Officer two (2) weeks prior to commencing the installation of the synthetic liner.
37. The Licencee shall cover all surfaces of the synthetic liner of a component of the Development with 0.3 metre of sand, other non-angular granular material, or material approved by an Environment Officer.

Alternative Liners for Components of the Development

38. The Licencee, upon written request and approval by the Director, may utilize an alternative geomembrane, synthetic or composite liner system that is at minimum equivalent to the hydraulic conductivity of one metre of 1×10^{-7} cm/s compacted clay or a 60 mil HDPE liner; is compatible with landfill leachate; and subject to terms and conditions set by the Director at the time of approval.

Mitigating Erosion and Runoff

39. The Licencee shall with respect to on-site earthen construction works, construct and maintain silt fences in the drainage routes transporting surface runoff off the property of the Development until vegetation has been re-established on the disturbed areas.
40. The Licencee shall construct and maintain the final side slopes of the above ground deposit of waste, including final cover, in the waste cell to not exceed one unit vertical to four units horizontal (1V:4H) and the final top slope to not less than one unit vertical to twenty units horizontal (1V:20H), unless otherwise specified in the Closure Plan by the qualified professional, or approved by the Director.

Operating Plan

41. The Licencee shall submit to the Director, within six (6) months of the date of issuance of this Licence, an Operating Plan that includes information regarding all aspects of the Development, to include but not be limited to:
 - a) operational parameters and objectives, including method of tracking placement of special wastes and those wastes requiring unusual management considerations;

- b) waste type acceptance parameters and limitations;
 - c) restrictions and procedures (if applicable) on volumes or ratios for organic based wastes;
 - d) incident tracking and reporting parameters;
 - e) all weather access roads;
 - f) composting and biosolids composting parameters, objectives, standards and ultimate use;
 - g) dust and litter control procedures;
 - h) vector control procedures;
 - i) leachate and landfill gas handling and management;
 - j) surface and ground water management;
 - k) monitoring and reporting parameters;
 - l) identification of operational records to be maintained; and
 - m) an overview of staffing qualifications and positions.
42. The Licencee shall implement the Operating Plan submitted pursuant to Clause 41 of this Licence.

Operation and Monitoring Records

43. The Licencee shall have available for inspection by an Environment Officer or the Director upon request, records of all operational activities, monitoring and analytical results, reports, certifications and documents identified in this Licence.
44. The Licencee shall keep for inspection, operating and monitoring records at the Development site office including:
- a) as-built drawings showing the location and development of excavation, fill area, final grades and structural components;
 - b) records of annual waste tonnage received at the site;
 - c) records of handling of any wastes (including special wastes) accepted at the landfill including the amounts accepted and the disposal locations within the landfill;
 - d) all Certifications and permits for acceptance of regulated materials (SRM permits, weigh scale certification);
 - e) an initial topographic survey and plans showing the areas where waste has been disposed in the current and previous years;
 - f) an annual update survey of active areas, or areas receiving cover;
 - g) nuisance records;
 - h) monitoring results;
 - i) complaints received and actions taken; and
 - j) a statement of compliance with Licence conditions.

Signage and Site Security

45. The Licencee shall post adequate signage at the entrance to the Development indicating, but not limited to the following:

- a) the types of wastes not accepted at the site;
- b) the hours and days of operation; and
- c) 24-hour telephone numbers to be called in the event of an emergency occurring at the site.

46. The Licencee shall staff and secure the Development so that:
- a) an attendant is on duty at the scale at all times during hours of acceptance of materials to the Development;
 - b) gates are provided for all access locations to the site;
 - c) the gates are kept locked when the attendants are not on duty or the Development is closed; and
 - d) other attendants to direct traffic and operate heavy equipment are on duty as necessary.

Materials Handling

47. The Licencee shall deposit all waste, other than material intended for recycling, composting or processing, in an active area within the Development.
48. The Licencee shall position fencing, including adequate portable litter fences around the active area or other locations where unloading or handling of materials occur, to prevent litter or other material from collecting on or escaping from the boundaries of the Development.
49. The Licencee shall not accept the following wastes at the Development:
- a) hazardous waste;
 - b) biomedical waste;
 - c) liquid industrial waste;
 - d) liquid waste;
 - e) radioactive waste or materials;
 - f) unbagged asbestos; or
 - g) soils or sediments containing contaminants at concentrations in excess of the criteria specified for industrial occupancy in the Canadian Council of Ministers of the Environment (CCME) Environmental Quality Guidelines (latest edition), and the CCME Canada Wide Standards.
50. The Licencee may receive wastes prohibited in Clause 49 of this Licence if appropriate provisions have been made in the Operating Plan for the Development submitted pursuant to Clause 41 of this Licence, or if a separate proposal has been submitted and approved by the Director.

Special Wastes

51. The Licencee shall not excavate in areas where special wastes have been previously buried without approval from an Environment Officer.
52. The Licencee shall keep record, by Global Positioning System (GPS), of the locations of buried special wastes.

WEIGH SCALES AND FACILITY BUILDINGS

Construction – Weigh Scales and Facility Buildings

53. The Licence shall install radiation detectors on all inbound traffic lanes.

Operation – Weigh Scales and Facility Buildings

54. The Licencee shall maintain federal certification of the weigh scales utilized at the entrance of the Development.

LANDFILL CELLS

Construction – Landfill Cells

55. The Licencee shall submit to the Director, at least sixty (60) days prior to construction of a new waste disposal cell or an infill waste disposal cell, the engineering design plans, sealed by an engineer(s) which address construction specifications of any new active area and include, but are not limited to the following:
 - a) engineering design with respect to construction of the waste disposal cell base and sides;
 - b) engineering design with respect to the construction of the leachate collection system in each new cell, and connections, if applicable, to the Leachate Management System;
 - c) location of access road(s) to the waste disposal cell;
 - d) details of the location of the waste disposal cell with respect to property lines; and
 - e) details of a drainage system to prevent water from entering the waste disposal cell and to channel the surface run-off into the Surface Water Management System for the Development.
56. The Licencee shall construct new waste disposal cells in accordance with the design plans submitted pursuant to Clause 55 of this Licence.

Operation – Landfill Cells

57. The Licencee shall restrict the maximum elevation of the above ground deposit of waste, including the final cover, to not exceed thirty (30) metres above grade.
58. The Licencee shall minimize the working face of each cell to reduce the generation of litter and leachate from the Development.
59. The Licencee shall compact waste deposited in the active area and cover the waste daily with cover material or alternative daily cover.
60. The Licencee, upon a written request to an Environment Officer, may, during extreme weather conditions, utilize temporary covering of wastes deposited in an active area. Such temporary covering material shall be replaced with permanent cover material when the extreme weather conditions cease, unless otherwise specified by an Environment Officer.

CLOSED LANDFILL CELLS

61. Any new waste cell or active area developed over an area that is identified as “closed landfill” on the map in Appendix ‘C’ or the Table of Appendix ‘D’; must be developed in accordance with a design plan for an infill cell, as submitted pursuant to Clause 55 of this Licence.

LEAF AND YARD WASTE COMPOSTING FACILITY

Construction – Leaf and Yard Waste Composting Facility

62. The Licencee shall submit to the Director, at least sixty (60) days prior to construction, engineering design plans, sealed by an engineer(s), which address construction specifications of the composting facility and includes, but are not limited to the following:
 - a) engineering design with respect to construction of the composting facility components;
 - b) specifications with respect to construction of a compost pad, designed with a minimum of 0.5-metre thick compacted clay liner with a hydraulic conductivity of not greater than 1×10^{-7} cm/sec or equivalent;
 - c) the location of all weather road(s) to the composting area;
 - d) details of the compost facility drainage system and integration into the Surface Water Management System for the Development; and
 - e) specifications with respect to construction of the onsite compost leachate basin designed with a minimum one (1) metre thick compacted clay liner or equivalent as approved by the Director.

63. The Licencee shall construct the Leaf and Yard Waste Composting Facility in accordance with the design plans submitted pursuant to Clause 62 of this Licence.

Operation – Leaf and Yard Waste Composting Facility

64. The Licencee shall operate the ditches for the collection and conveyance of impacted water off the Leaf and Yard Waste composting pad in such a manner that no standing water is present in the ditches.
65. The Licencee shall only accept and use green waste as compost feedstock for the Leaf and Yard Waste Composting Facility. The Licencee shall obtain written approval from an Environment Officer prior to the use of any other feedstock materials.
66. The Licencee shall not sell or make available, to any third party, leaf and yard waste compost generated at the Facility that does not achieve the quality requirements and specifications as contained in the most recent edition of the CCME publication entitled "*Guidelines for Compost Quality – PN 1340*" or equivalent standard approved by the Director.

BIOSOLIDS COMPOSTING FACILITY

Study - Biosolids

67. The Licencee shall submit to the Director a study within thirty (30) months of the issuance of this Licence, to include but not be limited to;
- a) any operational recommendations for biosolids compost utilization;
 - b) long term options for utilization of biosolids compost; and
 - c) timelines for developing and implementing the recommendations and options of the study.

Construction – Biosolids Composting Facility

68. The Licencee shall construct the pilot Biosolids Composting Facility in accordance with the Draft Conceptual Design and Operations Report entitled Leaf and Yard Waste Composting Facility and Pilot Biosolids Composting Facility at Brady Road Resource Management Facility dated August 2012, and the Pilot Biosolids Composting Facility Design Brief dated January 2013.

Operation – Biosolids Composting Facility

69. The pilot study shall run for a duration of two (2) years from commissioning, as identified in the alteration request for Environment Act Licence No. 1089E RR dated January 5, 2012.
70. The Licencee shall, during the pilot study, restrict the annual flow of biosolids to the Biosolids Composting Facility to a maximum of twenty percent (20%) of the biosolids that are generated from the City of Winnipeg's three water pollution control centres.
71. The Licencee shall operate the Biosolids Composting Facility activities separate from the Leaf and Yard Waste Composting Facility activities.
72. The Licencee shall operate the pilot Biosolids Composting Facility in accordance with the operations manual acceptable to the Director pursuant to the City of Winnipeg Biosolids Composting Pilot Study, and the Letter of Authorization dated April 30, 2012.
73. The Licencee shall not stockpile biosolids at any location at the Facility unless approved pursuant to Clause 72 of this Licence.
74. The Licencee shall not remove biosolids or biosolids compost from the Facility in any form, unless approved by an Environment Officer.
75. The Licencee shall utilize all biosolids compost products as landfill cover or as approved by the Director within the Facility for the duration of the pilot study.
76. The Licencee shall assess the quality (chemical and microbiological properties) of the used biofilter material in order to determine a suitable disposal or end use for the material. Proposed use or disposal method must be approved by an Environment Officer.
77. The Licencee shall haul all leachate collected in the underground leachate storage tank at the Biosolids Composting Facility and treat at a Wastewater Treatment Facility Licenced in accordance with *The Environment Act*. The Licencee shall operate the ditches for the collection and conveyance of impacted water off the biosolids composting pad in such a manner that no standing water is present in the ditches.

Monitoring and Reporting – Biosolids Composting Facility

78. The Licencee shall submit to the Director for approval, a report with respect to the pilot project's activities and proposed plans for continuing with the pilot study implementation or site remediation within 30 months of commissioning.

WOOD CHIP PROCESSING AND STORAGE AREA

Operation – Wood Chip Processing and Storage Area

79. The Licencee shall submit to the Director, within six (6) months of the date of issuance of this Licence an Operating Plan, to address design, operation and maintenance specifications of the Wood Chip Processing and Storage Area and include, but not be limited to the following:
- a) design with respect to site layout of the Wood Chip Processing and Storage Area;
 - b) location of all weather road(s) and method to maintain site access and security of the Wood Chip Processing and Storage Area;
 - c) methods to effectively produce, use and store materials;
 - d) methods to control or manage airborne particulates, noise, fire hazards, and management of Dutch Elm disease contaminated materials and other tree wastes and
 - e) details of the Wood Chip Processing and Storage Area drainage system and methods by which the runoff, impacted and non-impacted, is managed.
80. The Licencee shall operate the Wood Chip Processing and Storage Area in accordance with the Operating Plan submitted pursuant to Clause 79 of this Licence.
81. The Licencee shall operate the Wood Chip Processing and Storage Area to minimize airborne particulate and shall restrict hours of operation to the hours the Development is open to the public or as approved by the Director to reduce the potential for noise.

CONSTRUCTION MATERIAL AREA

Study – Construction Material Area

82. The Licencee shall submit to the Director a study within one (1) year of the issuance of this Licence, to include but not be limited to; any operational recommendations and plans for utilization, recycling or limitations for acceptance, handling or disposal of construction materials at the Development.

COVER MATERIAL STOCKPILE AREA

Construction - Cover Material Stockpile Area

83. The Licencee shall construct and maintain the geometry of the Cover Material Stockpile Area to allow for maximum recovery of the material and minimize erosion.

Operation – Cover Material Stockpile Area

84. The Licencee shall operate the Cover Material Stockpile Area to minimize soil erosion and sedimentation into any surface water features of the Development, and minimize any particulate matter from becoming airborne.

SAND/STREET SWEEPING STOCK PILE AREA

Operation – Sand / Street Sweeping Stock Pile Area

85. Prior to processing or cleaning the sand or street sweeping material for reuse; the Licencee shall submit to the Director, a plan identifying and mitigating potential environmental effects.
86. The Licencee shall operate the Sand / Street Sweeping Stock Pile Area in accordance with the Operating Plan submitted pursuant to Clause 85 of this Licence.

COMMUNITY RESOURCE RECOVERY CENTRE

Operation – Community Resource Recovery Centre

87. The Licencee shall operate the Community Resource Recovery Centre in a manner to prevent windblown waste, litter, odour generation, fire and other hazards, as well as preventing spills from contaminating runoff.

SEGREGATED MATERIAL STORAGE AREA

Operation – Segregated Material Storage Area

88. The Licencee shall not accept any materials which are not listed in the Operating Plan, pursuant to Clause 41, into the Segregated Material Storage Area unless otherwise approved by an Environment Officer.

89. The Licencee shall operate the Segregated Material Storage Area in a manner to prevent windblown waste, litter, odour generation, fire and other hazards.
90. The Licencee shall remove ozone depleting substances from appliances using a certified contractor in accordance with *Manitoba Regulation 103/94*, or any future amendment thereof, respecting *Ozone Depleting Substances and Other Halocarbons*.

LEACHATE MANAGEMENT SYSTEM

Operation – Leachate Management System

91. Unless otherwise approved by the Director, the Licencee shall haul and treat leachate collected in the sump manholes or any other component of the Leachate Management System at the City of Winnipeg North End Water Pollution Control Centre.
92. The Licencee shall submit a Leachate Management Plan, to the Director, within one (1) year of issuance of this Licence, to include, but not be limited to:
 - a) design, construction, operation and maintenance procedures complete with proposed frequencies;
 - b) proposed performance criteria for maximum leachate head on the liner for all new cells;
 - c) proposed methods for reducing leachate head in existing cells;
 - d) pumping schedules;
 - e) methods to reduce potential chemical precipitation and clogging of collection components;
 - f) leachate line clean out methodologies;
 - g) inspection methodologies and frequency; and
 - h) processes to prevent landfill gas escape from leachate collection components.
93. The Licencee shall inspect the leachate collection and extraction system in the frequency and with the methodology as identified in the Leachate Management Plan, submitted pursuant to Clause 92 of this Licence.
94. The Licencee shall not recirculate leachate or contaminated water collected at the Development through the landfill cells unless approved by the Director.
95. The Licencee shall operate the Leachate Management System in accordance to the Plan submitted pursuant to Clause 92 of this Licence and shall not implement any alternative method of leachate treatment without receiving prior approval of the Director.

Monitoring and Reporting – Leachate Management System

96. The Licencee shall report an occurrence of leachate breakout which leaves the Development to an Environment Officer within 24 hours.
97. The leachate collection system shall be designed to monitor leachate head according to the Leachate Management Plan submitted pursuant to Clause 92.
98. The Licencee shall report if the maximum depth of leachate in any waste cell, developed after August 1, 2013, exceeds the maximum head, as indicated in the approved Leachate Management Plan, above the crown of the collection system cell bottom piping; for a period of seven (7) days to an Environment Officer within 24 hours.
99. The Licencee shall record all events that require reporting, as per Clause 96 and 98, the elevation of the leachate in all waste disposal cells twice per year, in spring and fall, and after each maintenance clean out of the leachate system. The leachate elevation, historical trends and an assessment of the effectiveness of the leachate collection system in maintaining less than the maximum specified head shall be included in the annual report.
100. The Licencee shall develop a Leachate Sampling and Analysis Plan and submit to the Director within one (1) year of the date of issuance of this Licence. The Plan shall include but not be limited to:
 - a) the location, type and number of samples from the leachate collection sump manholes or other leachate collection components;
 - b) the parameters to be analysed; and
 - c) the frequency of analysis.
101. The Licencee shall implement the plan submitted in accordance with Clause 100 of this Licence.

LANDFILL GAS COLLECTION AND FLARING SYSTEM

Construction – Landfill Gas Collection and Flaring System

102. The Licencee shall submit to the Director a copy of authorization for construction, expansion or major modification of a component which is under pressure, of the Landfill Gas Collection and Flaring System, issued by the Office of the Fire Commissioner, prior to any construction, expansion or major modification of the landfill gas system at the Development.
103. The Licencee shall, at least sixty (60) days prior to any future construction, major modification or expansion, provide to the Director complete design and

construction details for the Landfill Gas Collection and Flaring System. The design and construction details shall include at a minimum:

- a) number and location of landfill gas extraction wells;
- b) configuration of landfill gas extraction wells;
- c) design and construction details of landfill gas extraction wells;
- d) location of condensate traps;
- e) description of pipe network; and
- f) location, design, and construction details of blower and flare station.

104. The Licencee shall construct or modify the Landfill Gas Collection and Flaring System in accordance with the design plans submitted pursuant to Clause 103 of this Licence.

Operation – Landfill Gas Collection and Flaring System

105. The Licencee shall, in the event of an environmental, mechanical, electrical or human condition which causes a shutdown or malfunction of a component of the Landfill Gas Collection and Flaring System, lasting greater than 72 hours, report the condition to an Environment Officer within the next 24 hours. The report shall include the nature of the shutdown or malfunction, the time and estimated duration of the event, the cause for the event and the proposed actions for return to operation.
106. The Licencee shall not combust landfill gas at any location other than the enclosed landfill gas flare or other combustion equipment as approved by the Director.
107. The Licencee shall combust only landfill gas or propane for startup in the enclosed landfill gas flare.
108. The Licencee shall not emit particulate matter from the Development such that:
- a) particulate matter:
 - i) exceeds 0.23 grams per dry standard cubic metre calculated at 25 degrees Celsius and 760 millimetres of mercury, corrected to 12 percent carbon dioxide for processes involving combustion, from any point source of the Development;
 - ii) exhibits a visible plume with an opacity of greater than 5 percent at any point beyond the property line of the Development; or
 - iii) results in the deposition of visible particulate residue at any time beyond the property line of the Development; or
 - b) opacity from any point source of the Development equals or exceeds:
 - i) 20 percent as the average of any 24 consecutive opacity observations taken at 15 second intervals;
 - ii) 20 percent for more than 16 individual opacity observations within any 1 hour period; or
 - iii) 40 percent for any individual opacity observation.

109. The Licencee shall manage condensate from the landfill gas collection system in accordance with the Operating Plan submitted pursuant to Clause 41 of this Licence.

Monitoring and Reporting – Landfill Gas Collection and Flaring System

110. The Licencee shall submit to the Director for approval, within six (6) months of the date of issuance of this Licence, an operating plan which includes information respecting activities to be implemented in the event that the monitoring program identifies any pollutant in air emissions, as a result of the operation of the Development, in excess of the specifications of Clause 108 of this Licence.

Monitoring and Reporting – Subsurface Landfill Gas Monitoring Program

111. The Licencee shall submit to the Director, within six (6) months of the date of issuance of this Licence, a monitoring program which includes:
- a) methodology for detection of lateral landfill gas migration;
 - b) proposed monitoring well locations;
 - c) sampling frequency;
 - d) development of a Subsurface Landfill Gas Contingency Plan for migration occurrence; and
 - e) an annual report for subsurface gas migration including collected data and analysis.

SURFACE WATER MANAGEMENT SYSTEM

Surface Water Management

112. The Licencee shall manage surface water, both impacted and non-impacted, at the Development to prevent uncontrolled release from the Development.
113. The Licencee shall construct and maintain permanent and temporary dyke structures and surface drainage to divert non-impacted surface water runoff away from active areas and Development components under construction to the Surface Water Management System of the Development, in accordance with the Surface Water Management Plan.
114. The Licencee shall:
- a) not construct ditch or surface water management features during periods of heavy rain;
 - b) place and/or isolate all construction material where it will not erode into any watercourse;
 - c) implement effective long-term sediment and erosion control measures such as sedimentation ponds and short-term sediment and erosion control measures such as silt fencing to prevent soil-laden runoff, and /or silt from

- entering any watercourse during construction and operation of a component of the development and maintain the control measure until vegetation is established; and
- d) routinely inspect all erosion and sediment control structures and complete any necessary maintenance or repair within 15 days of identification of the deficiency.

Construction – Surface Water Management System

115. The Licencee shall submit to the Director, within six (6) months of the date of issuance of this Licence, a Surface Water Management System design plan including engineered wetlands for the Development on the basis of a 1 in 25 year rainfall event. The plan shall include three tiers of water management addressing clean, impacted and leachate water with water management from all surface elevations of the Development. The plan shall include the source, any conveyance methods, treatment, monitoring parameters and discharge routes. Sealed engineering design plans shall be provided to address construction specifications of all surface water management features and include, but not be limited to the following:
- a) engineering design with respect to the ponds, engineered wetlands, if included in the design, and conveyance routes;
 - b) location of all weather road(s) to the surface water management features;
 - c) details of the location of the surface water management features with respect to the property lines; and
 - d) details of fencing, if required, around surface water management features.
116. The Licencee shall construct the Surface Water Management System in accordance with the design plan submitted pursuant to Clause 115 of this Licence.
117. The Licencee shall obtain a Water Rights Licence from the Water Resources Branch, Conservation and Water Stewardship, if required, for drainage works that cause water to leave the Development. The Licencee shall provide to the Director, a copy of the Water Rights Licence at minimum ten (10) days prior to any construction identified within that Licence.

Operation – Surface Water Management System

118. The Licencee shall operate and maintain the Surface Water Management System to minimize sedimentation within the waterways, odour and pest problems and to maximize nutrient reduction.

Monitoring and Reporting – Surface Water Management System

119. The Licencee shall, for the parameters listed in Appendix 'G', attached to this Licence, sample and evaluate for the 2014 and 2015 monitoring season; and submit a report, prior to February 2016, the water quality criteria objectives for the Development, to be approved by the Director.
120. The Licencee shall develop a surface water sampling and analysis plan and submit it for approval within six (6) months of the date of issuance of this Licence. The plan shall propose the location, type and number of locations to be sampled from the surface water management system, the parameters and frequency of sampling. The Licencee shall maintain records of the results of all such analyses.
121. The Licencee shall undertake, at a frequency deemed appropriate by the Director, the sampling and analysis of water flowing onto and off the Development from the Surface Water Management System, for the parameters and at a frequency identified in the plan submitted and approved pursuant to Clause 120 of this Licence.

GROUNDWATER

Monitoring and Reporting – Groundwater

122. As a result of the operation of the Development, the Licencee shall not cause the concentration values of the parameters listed in Appendix 'F', attached to this Licence, to exceed background levels in groundwater at the compliance boundary.
123. The Licencee shall develop a groundwater monitoring, sampling and analysis plan and submit it for approval within six (6) months of the date of issuance of this Licence. The plan shall propose the location, type and number of locations to be monitored and sampled, the parameters and the frequency of sampling. The Licencee shall maintain records of the results of all such analyses.

**GROUNDWATER AND SURFACE WATER REPORT
AND CONTINGENCY ACTION PLAN**

Monitoring and Reporting

124. The Licencee shall prepare a report which compares the analytical results obtained for the sampling with the results from previous sampling events, and shall provide annually to the Director a report summarizing the results in the report pursuant to Clause 127 of this Licence.

125. The Licencee shall submit to the Director for approval, within six (6) months of the date of issuance of this Licence, a plan that includes a Contingency Action Plan to be implemented in the event that the monitoring program identifies any parameter in surface or groundwater at the property boundary, as a result of the operation of the Development, in excess of background levels. The Contingency Plan shall assess the significance of the exceedance in relation to applicable groundwater and surface water criteria, and action to be taken to mitigate the contamination, if required.
126. The Licencee shall notify an Environment Officer of all incidents requiring Contingency Action Plan implementation regarding groundwater or surface water pollution within seven (7) days of identification of an incident; notification shall include the nature of the incident, the area affected (when determined), immediate actions taken and follow up action proposed to be taken.

ANNUAL REPORT

127. The Licencee shall, unless otherwise approved by the Director, on or before the 15th day of April of each year and beginning in 2015, prepare an annual report with respect to all activities at the Development conducted pursuant to this Licence during the previous calendar year. The format of the report shall be approved by the Director and contain information as identified in the Operating Plan approved pursuant to Clause 41 to this Licence.
128. The Licencee shall compare the results included with the report pursuant to Clause 127 of this Licence with annual reports submitted in previous years to show trends and variances. The reports shall identify, at minimum, any significant variations, the cause of the variations and any actions taken.
129. The Licencee shall create an Executive summary from the previous year's annual report, pursuant to Clause 127 of this Licence; the Executive summary is to be submitted to the Director, and made available to the public:
- a) by posting on the City of Winnipeg's website;
 - b) by deposit at the City of Winnipeg Millennium Library; and
 - c) at the Development site office.

EMERGENCY RESPONSE PLAN

130. The Licencee shall maintain an Emergency Response Plan, in accordance with the Canadian Centre for Occupational Health and Safety emergency planning guidelines or other document acceptable to the Director, outlining procedures to be used in the event of leak, spill, fire, flood or other hazardous condition at the facility, or if waste management functions are disrupted.

131. The Licencee shall have available for inspection by an Environment Officer, upon request, records of the details of all incidents requiring the implementation of the Emergency Response Plan at the Development site office.

SITE SAFETY PLAN

132. The Licencee shall maintain a Site Safety Plan in the Operating Procedures in accordance with Provincial and City requirements.

CLOSURE AND POST CLOSURE

133. The Licencee shall submit to the Director, within one (1) year of the date of issuance of this Licence, a Preliminary Closure and Post Closure Plan for the Development. The plan shall address the closure of the existing and closed waste disposal cells and provide a preliminary plan for the closure of the new waste disposal cells.
134. The Licencee shall submit to the Director, not less than one (1) year prior to closure of an active waste disposal cell of the Development, an updated engineering design for Closure and Post Closure Plan for that component of the Development.
135. The Licencee shall, where an increase in the slope of the final cover due to settlement, or erosion of the final cover occurs during the post-closure period, take remedial action to correct the situation and maintain the design.
-
136. The Licencee shall implement and maintain the approved Closure and Post Closure Plan for the Development pursuant to Clause 133 or 134 of this Licence.

FINANCIAL ASSURANCE/INSURANCE

137. The Licencee shall provide to the Director confirmation of financial insurance coverage in the form of: Environmental Impairment Liability insurance providing coverage subject to a minimum limit of \$1.0 million per occurrence or claim, including coverage for gradual, and sudden and accidental pollution. Coverage to include on-site and off-site clean up costs, and be placed with insurers satisfactory to the Province of Manitoba. The Province of Manitoba shall be added as an Additional Insured on the policy. The policy shall contain a clause stating that the Insurer will give Manitoba 60 days prior written notice in case of significant reduction in coverage or policy cancellation.
138. During the term of the Licence, the City of Winnipeg, as Licencee, may self insure for environmental impairment liability. Such self-insurance shall satisfy

Manitoba's requirement for Environmental Impairment Liability insurance as set out in Clause 137 of this Licence.

RECORD DRAWINGS

139. The Licencee shall:

- a) prepare "record drawings" for the Development and label the drawings "record drawings"; and
- b) provide to the Director, within six (6) months, or as otherwise approved by the Director, after completion of construction of each component of the Development, two paper copies and one electronic copy of the "record drawings" of the component of the Development.

REVIEW AND REVOCATION

- A. This Licence replaces Licence No. 3081 and No. 2890 R issued to The City of Winnipeg – Water and Waste Department, which is hereby rescinded.
- B. This Licence replaces Operating Permit No 1-015 issued to The City of Winnipeg, which is hereby rescinded.
- C. If, in the opinion of the Director, the Licencee has exceeded or is exceeding or has or is failing to meet the specifications, limits, terms, or conditions set out in this Licence, the Director may, temporarily or permanently, revoke this Licence.
- D. If, in the opinion of the Director, new evidence warrants a change in the specifications, limits, terms or conditions of this Licence, the Director may require the filing of a new proposal pursuant to Section 11 of *The Environment Act*.

"original signed by"

Tracey Braun, M.Sc.
Director
Environment Act

File No.: 5556.00

APPENDIX 'A'
TO ENVIRONMENT ACT LICENCE NO. 3081 R

Misc. Plan No. 10998/1
Brady Land Fill Title Plot

APPENDIX 'B'
TO ENVIRONMENT ACT LICENCE NO. 3081 R

**Legal Description of Land Parcels for
Brady Road Resource Management Facility**

Title No:	Legal Description
1050929	Parcels D and E Plan 20197 WLTO in OTM Lots 79-82 Parish of St. Norbert
1233636	Parcels A and B Plan 20197 WLTO in OTM Lots 79 to 82 Parish of St. Norbert
1387181	OTM Lots 83, 84 and 85 of the Parish of St. Norbert, exc out of said Lot 83, Firstly: All that portion taken for Public Road Plan 7169 WLTO and secondly: all that portion shown as the Right-of-way of a Power Transmission Line Plan 10328 WLTO and exc out of all of said lots, firstly: all those portions taken for the Right-of-way of Power Transmission Line Plan 9349 WLTO and secondly: all mines and minerals that may be found to exist within upon or under the above described land.
1233778	All that portion of the SLY 132 feet perp of OTM lot 86, of the Parish of St. Norbert which lies to the east of a line drawn parallel to the eastern limit of said lot and distant wly therefrom 1650 feet measure on the southern limit of said lot
1233776	All that portion of nly 132 feet perp of the sly 264 feet perp of OTM Lot 86 Parish of St. Norbert which lies to the east of a line drawn parallel to the eastern limit of said lot and distant wly therefrom 1650 feet measured on the course of the southern limit of said lot.
1233783	All that portion of OTM Lot 86 Parish of St. Norbert which lies to the east of a line drawn parallel to the eastern limit of said lot and distant wly therefrom 1650 feet on the course of the southern limit of said lot exc of the land above described firstly: the sly 264 feet perp and secondly: the nly 10 feet perp
1387227	OTM Lot 86 Parish of St. Norbert, exc firstly: all that portion thereof lying to the east of a line drawn nly parallel to the eastern limit of said lot from a point in the southern limit of said lot distant wly thereon 1650 feet from the said eastern limit, which lies to the south of a line drawn south of parallel with and perp distant 10 feet from the northern limit of said lot and secondly: all those portions thereof taken for the Right-of-way for Transmission Line Plans 9349 and 15762 WLTO.
1387230	OTM Lot 87 Parish of St. Norbert, exc Right-of-way for Power Transmission Line Plans 9349 and 15762 WTLO.
1387091	OTM Lots 88, 89 and 90 Parish of St. Norbert exc firstly: Power Transmission Line Right-of-way (Pink and Green) Plan 9349 WLTO and secondly: Road Plan 24391 WLTO

**APPENDIX 'B' (cont'd.)
TO ENVIRONMENT ACT LICENCE NO. 3081 R**

**Legal Description of Land Parcels for
Brady Road Resource Management Facility**

- | | |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1387094 | All that portion of OTM Lot 91 Parish of St. Norbert which lies to the west of the western limit of Road Plan 24391 WLTO exc parcel "B" Plan 13724 WLTO |
| 1233799 | Parcels "A" and "B" Plan 13724 WLTO exc Public Road Plan 24391 WLTO in OTM Lot 91 Parish of St. Norbert and in closed government road allowance between OTM Lot 91 and 92 of said Parish |
| 1233807 | All that portion of parcel "A" Plan 19793 WLTO which lies to the west of the western limit of Road Plan 24391 WLTO in OTM Lots 92 and 93 Parish of St. Norbert |
| 1240481 | All that portion of OTM Lot 94 Parish of St. Norbert taken for Public Work Plan 6493 (now closed) exc public road plans 6788 WLTO and 24391 WLTO |
| 1240483 | OTM Lot 94 Parish of St. Norbert exc firstly: Public Work Plan 6493 WLTO (Closed) and secondly: Public Road Plans 6788 WLTO and 24391 WLTO |
| 1233797 | All that portion of OTM Lot 95 Parish of St. Norbert which lies to the south west of the north eastern limit of Public Road Plan 6788 WLTO exc firstly: said Road Plan 6788 and secondly: Public Road Plan 24391 WLTO |
| 1233785 | All those portions of OTM Lot 101 and of the S ½ of OTM Lot 102 of the Parish of St. Norbert which lie to the south west of the south-western limit of Public Road Plan 6788 WLTO |
| 1233784 | All those portions of OTM Lot 103 and of the N 1/2 of OTM Lot 102 Parish of St. Norbert which lie to the south west of the south-western limit of Public Road Plan 6788 WLTO |
| 1240478 | All those portions of OTM Lots 104, 105 and 106 Parish of St. Norbert which lie to the SW of Public Highway Plan 6788 WLTO exc all mines and minerals as the same are more fully setforth in transfer No. A37539 WLTO and Exc out of said Lot 106, Plan 21972 WLTO |

APPENDIX 'C'
TO ENVIRONMENT ACT LICENCE NO. 3081 R

**City of Winnipeg Brady Road Resource Management Facility
Master Plan**

APPENDIX 'D'
TO ENVIRONMENT ACT LICENCE NO. 3081 R

City of Winnipeg Brady Road Resource Management Facility
Landfill Cell Location Plan

APPENDIX 'E'
TO ENVIRONMENT ACT LICENCE NO. 3081 R

**City of Winnipeg Brady Road Resource Management Facility
Community Liaison Committee**

Responsibility

The City of Winnipeg will establish and chair the Community Liaison Committee for the Brady Road Resource Management Facility.

Representation

The Committee shall consist of the following representatives, at minimum:

- City of Winnipeg Water and Waste Division, Chair
- Rural Municipality of Macdonald
- Rural Municipality of Ritchot
- LADCO Representative
- Citizen Representatives – 1 appointed by each Rural Municipality that participates and 3 appointed by the City of Winnipeg
- Manitoba Conservation and Water Stewardship

A secretary will be assigned, by the Chair, to record discussion and decisions for each meeting when the meeting is called to order.

Terms of Reference

The Committee shall meet as required by planning, construction and operational activities, but not less frequently than twice a year for the first five years. The first meeting shall occur within six (6) months of the issuance of this Licence. Following construction; meeting frequency is to be determined by the Committee.

The Chair of the Committee shall notify Manitoba Conservation and Water Stewardship 14 days prior, of the time and location of the next meeting. Minutes from the meetings shall be documented and the Chair will be required to have meeting minutes submitted to an Environment Officer within sixty (60) days following a meeting called by the Chair.

The Committee shall provide advice to the Licencee and the Director respecting the following:

1. The development of the landscaping plan required in Licence Clause 21.
2. The extent and frequency of noise and odour monitoring required in Licence Clause 41.
3. Measures to mitigate the impact of construction activities on the local environment.
4. Measures to mitigate the impact of operational activities on the local environment.

APPENDIX 'F'
TO ENVIRONMENT ACT LICENCE NO. 3081 R
COMPREHENSIVE WATER QUALITY CHEMICAL
AND MICROBIOLOGICAL PARAMETERS

Parameter	Notes
Alkalinity-bicarbonate	Dissolved
Alkalinity-carbonate	Dissolved
Alkalinity-hydroxide	Dissolved
Alkalinity-total	Dissolved
Hardness- as CaCO ₃	Dissolved
pH-units	Dissolved
Specific Conductivity	Dissolved
Turbidity-NTU	
Residue-filterable	
Residue-non filterable	
Residue-total	
Chloride	Dissolved
Sulphate	Dissolved
Cyanide-total	Dissolved
Ammonia	Dissolved
Nitrate-Nitrite-Nitrogen	Dissolved
Total Kjeldhal Nitrogen	
Phosphorus	Dissolved
Arsenic	Dissolved
Barium	Dissolved
Beryllium	Dissolved
Cadmium	Dissolved
Calcium	Dissolved
Chromium	Dissolved
Copper	Dissolved
Iron	Dissolved
Lead	Dissolved

APPENDIX 'F' (cont'd.)
TO ENVIRONMENT ACT LICENCE NO. 3081 R
COMPREHENSIVE WATER QUALITY CHEMICAL
AND MICROBIOLOGICAL PARAMETERS

Parameter	Notes
Magnesium	Dissolved
Manganese	Dissolved
Mercury	Total
Nickel	Dissolved
Potassium	Dissolved
Selenium	Dissolved
Silver	Dissolved
Sodium	Dissolved
Zinc	Dissolved
Naphthalene	
Benzo a pyrene	
Anthracene	
CCME Petroleum Hydrocarbon Fraction 1	
CCME Petroleum Hydrocarbon Fraction 2	
CCME Petroleum Hydrocarbon Fraction 3	
CCME Petroleum Hydrocarbon Fraction 4	
Leachable Lead	
Benzene	
Ethylbenzene	
Toluene	
Xylene	
Vinyl Chloride	
Diazinon	
2, 4-D	
Coliforms	Fecal & Total
<i>E.Coli</i>	

APPENDIX 'G'
TO ENVIRONMENT ACT LICENCE NO. 3081 R

**SURFACE WATER QUALITY CHEMICAL
AND MICROBIOLOGICAL PARAMETERS**

Parameter	Notes
Alkalinity-bicarbonate	Dissolved
Alkalinity-carbonate	Dissolved
Alkalinity-hydroxide	Dissolved
Alkalinity-total	Dissolved
Hardness as CaCO ₃	Dissolved
pH-units	Dissolved
Specific Conductivity	Dissolved
Turbidity-NTU	
Residue-filterable	
Residue-non filterable	
Residue-total	
Chloride	Dissolved
Sulphate	Dissolved
Cyanide-total	Dissolved
Ammonia	Dissolved
Nitrate-Nitrite-Nitrogen	Dissolved
Total Kjeldhal Nitrogen	
Phosphorus	Dissolved
Arsenic	Dissolved
Barium	Dissolved
Beryllium	Dissolved
Cadmium	Dissolved
Calcium	Dissolved
Chromium	Dissolved
Copper	Dissolved
Iron	Dissolved
Lead	Dissolved
Magnesium	Dissolved
Manganese	Dissolved
Mercury	Dissolved
Nickel	Dissolved
Potassium	Dissolved
Selenium	Extractable
Sodium	Dissolved
Zinc	Dissolved
Coliforms	Fecal & Total
COD & BOD	
<i>E. Coli</i>	

APPENDIX 'H'
TO ENVIRONMENT ACT LICENCE NO. 3081 R

SOIL SAMPLING

1. The Licencee shall provide a drilling rig, acceptable to the designated Environment Officer, to extract soil samples from the specified liner of the structure. This includes all liners constructed with clay. The drill rig shall have the capacity to drill to the maximum depth of the clay liner plus an additional 2 metres. The drill rig shall be equipped with both standard and hollow stem augers. The minimum hole diameter shall be 5 inches.
2. For liners placed or found at the surface of the structure, the Licencee shall provide a machine, acceptable to the designated Environment Officer, capable of pressing a sampling tube into the liner in a straight line motion along the centre axis line of the sample tube and without sideways movement.
3. Soil samples shall be collected and shipped in accordance with ASTM Standard D 1587 (Standard Practice for Thin-Walled Tube Sampling of Soils), D 4220 (Standard Practice for Preserving and Transporting Soil Samples) and D 3550 (Standard Practice for Ring-Lines Barrel Sampling of Soils). Thin-walled tubes shall meet the stated requirements including length, inside clearance ratio and corrosion protection. An adequate venting area shall be provided through the sampling head.
4. At the time of sample collection, the designated Environment Officer shall advise the Licencee as to the soil testing method that must be used on each sample. The oedometer method may be used for a sample were the Environment Officer determines that the soil sample is taken from an undisturbed clay soil which has not been remoulded and which is homogeneous and unweathered. The triaxial test shall be used for all samples taken from disturbed and remoulded soils or from non homogenous and weathered soils.
5. The Licencee shall provide a report on the collection of soil samples to the designated Environment Officer and to the laboratory technician which includes but is not limited to: a plot plan indicating sample location, depth or elevation of sample, length of advance of the sample tube length of soil sample contained in the tube after its advancement, the soil test method specified by the Environment Officer for each soil sample and all necessary instructions from the site engineer to the laboratory technician.
6. All drill and sample holes shall be sealed with bentonite pellets after the field drilling and sampling has been completed.

**APPENDIX 'H' (cont'd.)
TO ENVIRONMENT ACT LICENCE NO. 3081 R**

SOIL TESTING METHODS

1. Triaxial Test Method

- a) The soil samples shall be tested for hydraulic conductivity using ASTM D 5084 (Standard Test Method for Measurement of Hydraulic Conductivity of Saturated Porous Materials Using a Flexible Wall Permeameter).
- b) Soil specimens shall have a minimum diameter of 70 mm (2.75 inches) and a minimum height of 70 mm (2.75 inches). The soil specimens shall be selected from a section of the soil sample which contains the most porous material based on a visual inspection. The hydraulic gradient shall not exceed 30 during sample preparation and testing. Swelling of the soil specimen should be controlled to adjust for: the amount of compaction measured during sample collection and extraction from the tube and the depth or elevation of the sample. The effective stress used during saturation or consolidation of the sample shall not exceed 40 kPa (5.7 psi) or the specific stress level, that is expected in the field location where the sample was taken, whichever is greater.
- c) The complete laboratory report, as outlined in ASTM D 5084, shall be supplied for each soil sample collected in the field.

2. Oedometer Test Method

- a) The soil samples shall be tested for hydraulic conductivity using ASTM D 2435 (Standard Test Method for One-Dimensional Consolidation Properties of Soils).
- b) Soil specimens shall have a minimum diameter of 50 mm (2 inches) and a minimum height of 20 mm (0.8 inches). The soil specimens shall be selected from a section of the soil sample which contains the most porous material based on a visual inspection. The soil specimen shall be taken from an undisturbed soil sample. The soil specimen shall be completely saturated.
- c) The complete laboratory report, as outlined in ASTM D 2435, shall be supplied for each soil sample collected in the field.

This is Exhibit “C” referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read 'A. P. Jones', is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba



THE CITY OF WINNIPEG
WATER AND WASTE DEPARTMENT
SOLID WASTE

BRADY ROAD RESOURCE MANAGEMENT FACILITY – SITE PLAN

This is Exhibit “D” referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read "A. Pledger", is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba

Homicide Investigation – Update: C22-103187

Thu, Dec 1 2022, 1:23pm

As previously released on May 16, 2022, the Winnipeg Police Service provided information regarding the murder investigation of 24-year-old Rebecca CONTOIS of Winnipeg (a member of Crane River First Nation) after her partial remains were discovered in the 200 block of Edison Avenue.

On May 18, members of the Homicide Unit arrested and charged a 35-year-old male, **Jeremy Anthony Michael SKIBICKI**, of Winnipeg, for First Degree Murder, and he was detained in custody.

Due to the nature of the circumstances of this investigation, Homicide investigators did not rule out the possibility of additional victims.

The Homicide Unit continued the investigation and established that three additional victims were murdered by Jeremy SKIBICKI between March and May 2022.

Morgan Beatrice HARRIS, a 39-year-old female of Winnipeg and a member of Long Plain First Nation, is believed to have been killed on or about May 1, 2022.

Mercedes MYRAN, a 26-year-old female of Winnipeg and a member of Long Plain First Nation, is believed to have been killed on or about May 4, 2022.

A fourth female victim has been confirmed but has yet to be identified. She is believed to have been killed on or about March 15, 2022.

On December 1, 2022, the Homicide Unit, in conjunction with Manitoba Justice, attended Milner Ridge Correctional Centre and executed a warrant charging SKIBICKI with three further counts of First Degree Murder. He remains in custody.

Police are now at a point in the investigation where the public's assistance is being sought to help identify this victim. We have provided a photograph of a jacket as we believe the victim wore a similar jacket. Any information may significantly progress this investigation.

The jacket is reversible: Please note the black and white pattern along with the words "baby phat" and the cat-like logo on the front and back of the jacket. There is also a fur hood.



Outside of jacket (front and back)





Inner/reversible side of jacket (front and back)

Anyone with information about this investigation, specifically about this jacket, is asked to contact the Homicide Unit at 204-986-6508 or Crime Stoppers at 204-786-TIPS (8477).

Was this information helpful?

This is Exhibit “E” referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read "A. Pledger", is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba

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Victim's relatives block landfill

Supporters demand operational halt and a search for missing, murdered Indigenous women

By: [Chris Kitching](#)

Posted: 7:02 PM CST Sunday, Dec. 11, 2022

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Hey there, time traveller!

This article was published **11/12/2022** (211 days ago), so information in it may no longer be current.

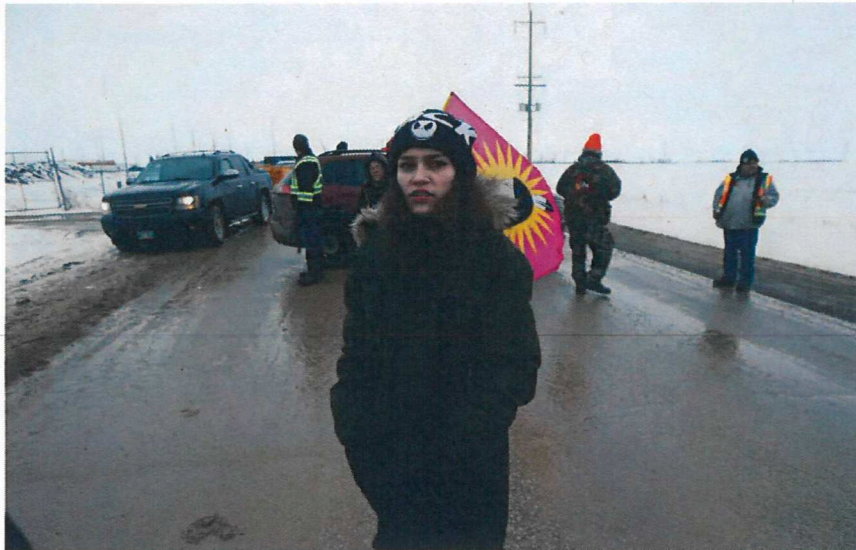
Morgan Harris's relatives and their supporters blocked access to a Winnipeg landfill Sunday to escalate calls for searches of two sites, including one where her remains are believed to be.

About two dozen people took part in a blockade of the Brady Road landfill on Winnipeg's southern limits to demand a halt to operations and a search for missing or murdered Indigenous women who may be there, including Tanya Nepinak.

"How many other women are they not looking for? What we're dealing with here, potentially, is a mass burial site," said Harris's daughter, Cambria, noting the group is prepared to stay there for a lengthy period.

RELATED ITEMS

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JOHN WOODS / WINNIPEG FREE PRESS

Cambria Harris, daughter of Morgan Harris, stands at the entrance to the Brady Road landfill Sunday, where about two dozen people took part in a blockade.

A second group gathered at the privately-owned Prairie Green Landfill just north of the city, where city police believe the remains of Harris, 39, and Mercedes Myran, 26, are located.

A sacred fire was lit near the entrance to Prairie Green.

Their call for action demanded police services and governments do more to bring an end to violence against Indigenous women and girls.

After blocking Brady Road around 1:45 p.m., participants explained their reasons to drivers while turning private and commercial vehicles away.

Police were aware of the situation, but did not attend as of late afternoon.

"We support our citizens' right to peacefully, legally and safely protest," spokesman Const. Claude Chancy wrote in an email.

Alleged serial killer Jeremy Skibicki, 35, is charged with four counts of first-degree murder in the deaths of Indigenous women Harris, Myran, Rebecca Contois and an unidentified victim who's been named Buffalo Woman by elders.

The investigation began when Contois's partial remains were found in a garbage bin in North Kildonan in May. Additional remains belonging to the 24-year-old were found when police searched the city-run Brady Road landfill in June.

Detectives believe Buffalo Woman was killed in mid-March. They do not have a definitive location of her remains.

Landfill pauses operations amid calls to search for slain women's remains



Landfill 'dynamic, dangerous place' for search: Prairie Green manager



Police forced to defend decision not to search landfill for slaying victims



Indigenous leaders, government to decide on landfill search; police board 'not the arbiter,' chairman says



Police chief extends olive branch to slaying victims' families



Ottawa to fund study of landfill search for victims' remains



Crown tasked with rare case of no body and no identity in alleged serial killer case



Protesters demanding search for women's remains shut down access to Brady Road landfill



City appeals to activists blockading Brady landfill



Prairie Green landfill resumes partial operations



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Police suspect Harris and Myran's remains were deposited at Prairie Green, in the Rural Municipality of Rosser, after they were killed in May.

Both women were members of Long Plain First Nation.

Family members held search parties for Harris, who was reported missing May 1.

"We didn't want to give up. I believed we were going to find her," said her cousin, Melissa Normand.

Cambria Harris recalled her mother's sense of humour and kind nature, while explaining how the woman was failed by a number of systems.

A third-generation residential school survivor who was placed in foster care, Morgan Harris experienced homelessness and addiction, her family said.

"She wasn't given the best hand in life, but she always tried to do the best she could," said her cousin, Kirstin Witwicki. "She was so funny and so loyal. I always say she was so fearless, and it was true."

Prairie Green's owner, Waste Connections of Canada, halted operations last week amid ongoing discussions at various levels about the possibility of searching the four-acre landfill.

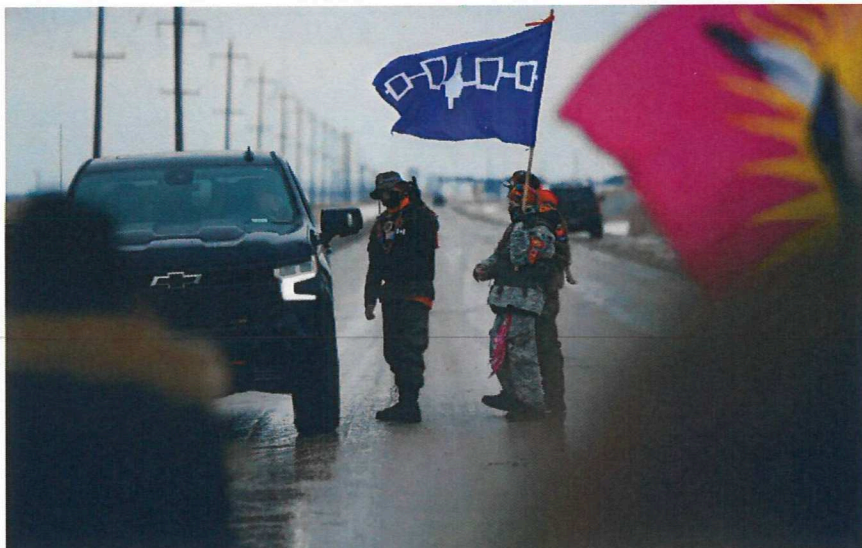
Indigenous leaders, the city, province and Ottawa are involved in exploring options, after police said a search wasn't feasible.

Harris's relatives said Long Plain Chief Kyra Wilson has received offers of help from search and recovery experts.

The pause in operations at Prairie Green is meant to give time to identify "what groups and what expertise" need to be consulted, and that will happen over the next few days, said Colin Fast, a spokesman for Mayor Scott Gillingham.

Coun. Markus Chambers, who chairs the Winnipeg Police Board, said chiefs of the impacted First Nations have been asked to contact the WPS for additional briefings that were given to the board.

"At this point and time we will listen to the community to find a path forward," he wrote in an email. "This may also involve consulting with industry experts to determine if a search can be done and the feasibility of actually finding remains."



JOHN WOODS / WINNIPEG FREE PRESS

Vehicles were turned around as about two dozen people took part in a blockade of the Brady Road landfill Sunday.

"We will also consider other options if remains cannot be found, but I cannot speculate what those other options may be at this time."

A spokesman for the Manitoba government said the WPS is the lead agency on the matter, but the province is prepared to provide any required or requested assistance.

Police Chief Danny Smyth previously said a site assessment by the forensic unit found there was "no hope" of finding remains for reasons including the overwhelming amount of waste at the site and safety concerns.

Police said a total of 34 days had elapsed before officers learned, on June 20, that Harris and Myran's remains were believed to be there.

In that time, about 10,000 truckloads of waste was disposed of at the site. Refuse has been compacted with 9,000 tonnes of wet clay.

The devastated families of Harris and Myran, along with Indigenous leaders, are urging police to reconsider.

"It is feasible and it can be done. Our family deserves that," said Normand.

"We'll (search) it ourselves. We'll take it into our own hands," said Cambria Harris, who noted the remains of Nepinak, who went missing in Winnipeg in 2011, are believed to be at Brady Road.

Police did not find the missing 31-year-old's remains during a search that lasted about a week in 2012.

A second-degree murder charge against Shawn Lamb was later stayed due to a lack of evidence. He pleaded guilty to manslaughter in the deaths of Indigenous women Carolyn Sinclair and Lorna Blacksmith.

Cambria Harris travelled to Ottawa with her sister, Kera, other family members and Indigenous leaders last week to call for action amid the Assembly of First Nations special chiefs assembly.

During a private meeting, she said, Prime Minister Justin Trudeau offered condolences and pledged his government will look into what it would take to search Prairie Green.

Before relatives left for Ottawa, police officers met them at Winnipeg's airport to explain the reasons for not searching Prairie Green.

"It's so disappointing, but not surprising, we're in a place in the world, in this city where they thought they were going to sit there and tell us they weren't going to search for the women, and that we're going to take that," said Witwicki. "I hope our words are enough to spur them into action."

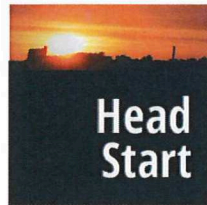
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Head Start

WEEKDAY MORNINGS

A quick glance at the news for the upcoming day.

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Cambria Harris is willing to meet with Smyth, who last week said he is open to discussions with Indigenous groups and further exploring whether it is possible to recover the women's remains, while resisting calls to resign.

Cambria Harris said she will hold the police chief to his pledges to protect women and pursue justice for the families of the women Skibicki is accused of killing.

"This is an opportunity to realize your words have value," she said.

chris.kitching@freepress.mb.ca

Twitter: @chriskitching

Chris Kitching

Reporter

As a general assignment reporter, Chris covers a little bit of everything for the Free Press.

 [Read full biography](#)

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This is Exhibit "F" referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read 'A. Pledge', is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba



Joseph Alexander Munro
December 11 at 10:09 PM · 🌐

👍❤️🔥 85

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👤 Author
Joseph Alexander Munro
First Nation Indigenous Warriors at Brady Landfill in support for searching the Landfills for the remains of Morgan Harris Rebecca Contois ... [See more](#)

6d 👍❤️🔥 28



J-Mish Leblanc
Love and respect for you guys 🙏
🇺🇸 United ❤️🐾🙌

6d 👍❤️ 5



Mary Starr
Right on for the awesome support 🙏🙏

6d 👍❤️ 3



Candace Hill
Love you brothers much respect 🙏❤️



Taylor Orpin is with **Korey Benoit** and **9 others**.

3d · 🌐



This week, we blockaded the road to the Brady Landfill, not allowing any commercial or residential dumping at the landfill where the remains of our sisters Morgan Harris, Mercedes Myran and Buffalo Woman are believed to lie.

Today, Thursday at 1pm, we stand together at City Hall and demand that all dumping on the previously used areas ceases immediately and remains a dump-free zone until we bring our sisters home.

The landfill has 30 more years worth of free space at its ... [See more](#)



This is Exhibit "G" referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read "A. Pledge", is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba

**Minutes – Standing Policy Committee on Finance and Economic Development –
April 28, 2023**

REPORTS

**Item No. 1 Financial Impact Associated with Brady Road Resource Management
Facility Blockade and Protest**

STANDING COMMITTEE DECISION:

The Standing Policy Committee on Finance and Economic Development concurred in the recommendation of the Winnipeg Public Service and received the report as information.

**Minutes – Standing Policy Committee on Finance and Economic Development –
April 28, 2023**

DECISION MAKING HISTORY:

Moved by Councillor Lukes,

That the recommendation of the Winnipeg Public Service be concurred in.

Carried

ADMINISTRATIVE REPORT

Title: FINANCIAL IMPACT ASSOCIATED WITH BRADY ROAD RESOURCE MANAGEMENT FACILITY BLOCKADE AND PROTEST

Critical Path: Standing Policy Committee on Finance and Economic Development

AUTHORIZATION

Author	Department Head	CFO	CAO
L. Szkwarek, CPA, CGA, Manager Finance and Administration	T. W. Shanks, M. Eng., P. Eng. Director, Water and Waste Department	C. Kloepper	M. Jack

EXECUTIVE SUMMARY

In December 2022, a blockade was established at the Brady Road Resource Management Facility (BRRMF) supporting families of missing and murdered Indigenous women, girls, and 2SLGBTQQIA persons (MMIWG2S+). As waste collection is an essential service, collection and disposal continued by diverting material from BRRMF to two privately owned Class 1 landfills in the metro region. The blockade was lifted on January 6, 2023.

The total financial impact to the City includes both the actual cost incurred and the estimated revenue loss during the closure. The expenditures incurred include the net cost to tip at private landfills rather than at BRRMF, signage, security, and extra collection cost. The total financial impact of the closure is \$1,509,513 as shown in the following table:

	Dec 2022	Jan 2023	Combined 2022/23
Total cost incurred	\$461,211	\$212,728	\$673,939
Lost revenue (estimated)	\$454,733	\$380,841	\$835,574
Total financial impact	\$915,944	\$593,569	\$1,509,513

RECOMMENDATIONS

That this report is received as information.

REASON FOR THE REPORT

On January 12, 2023, The Standing Policy Committee on Finance and Economic Development directed the Winnipeg Public Service to provide a written report to its meeting on February 13, 2023 with the following:

1. A breakdown of all costs associated with the blockade and protest at the Brady Road Resource Management Facility during 2022.

2. A verbal report on the preliminary impacts to date in 2023.

On February 13, 2023, The Standing Policy Committee on Finance and Economic Development received the verbal report of the Winnipeg Public Service as information, and granted an extension of 60 days for the Winnipeg Public Service to report back on the following:

1. A breakdown of all costs associated with the blockade and protest at the Brady Road Resource Management Facility during 2022.

IMPLICATIONS OF THE RECOMMENDATIONS

There are no implications arising from receiving this report as information.

HISTORY/DISCUSSION

On December 11, 2022, protestors supporting the families of missing and murdered Indigenous women, girls, and 2SLGBTQQIA persons (MMIWG2S+) blockaded the entrance to the Brady Road Resource Management Facility (BRRMF) Landfill for a short period. The protestors temporarily returned on December 13, 2022, and December 14, 2022. Subsequently, a permanent encampment was established on December 18, 2022, resulting in the closure of the BRRMF Landfill and 4R Winnipeg Depot. The blockade was lifted on January 6, 2023.

Residential solid waste collection is an essential City service. During the blockade, waste disposal was diverted away from the BRRMF Landfill to the two other Class 1 landfills in the region. Waste Connections of Canada Inc. operates the Prairie Green Landfill, located north of the City of Winnipeg and GFL Environmental Inc. operates the Mid Canada Landfill located in Ile Des Chenes, Manitoba.

Under regular operating conditions, residential garbage collection is disposed of at the BRRMF and is charged a tipping fee for disposal that is less than the tipping fee at the private landfills. In addition, the loss of these tipping fees at the BRRMF will result in a reduction of revenue in the Solid Waste Utility, which operates the BRRMF.

The financial impact of the blockade for December 2022 is as follows:

Redirection of residential, multi-family and commercial waste to external landfills	\$405,385
Redirection of glass from material recycling facility	\$ 15,565
Other costs	\$ 40,261
Lost revenue (estimated)	\$454,733
Total Financial Impact, December 2022	\$915,944

Of the total cost, \$405,385 impacted the tax-supported solid waste collection budget.

- There was a total of 6,837 tonnes of residential, multi-family and commercial waste collected under contract with the City of Winnipeg. This waste was disposed of at the Prairie Green Landfill and the Mid Canada Landfill. The cost per tonne charged varied from \$84.00 per tonne to \$85.19 per tonne. The amount reported here is the net difference between the per tonne rate less the internal tipping rate of \$26.60 per tonne should the waste have been disposed of at the BRRMF.

The remaining \$510,559 impacted the Solid Waste Utility.

- The material recycling facility (MRF) had to redirect 230 tonnes of glass to the Mid Canada Landfill at a cost of \$15,565. Glass would typically be repurposed at the BRRMF and accepted free of charge, however this material was disposed of for a fee. This cost was charged to the Solid Waste utility similar to the shipping of any marketable commodity from our recycling program.
- Other costs of \$40,261 absorbed by the Solid Waste Utility included signage, transportation for a site tour, security, delay of contracted capital projects at the BRRMF landfill as well as overtime costs for staff.
- The Solid Waste Utility lost revenue estimated at \$454,733 for materials diverted to other landfills. This included:
 - 445 tonnes at a rate of \$59 per tonne for residue redirected from the MRF
 - 6,837 tonnes at a rate of \$16.60 per tonne for residential, multi-family and commercial waste to external landfills
 - Approximately 3,860 tonnes at a rate of \$75 per tonne for commercial waste, and
 - Approximately 1,800 residential customers paying the minimum fee at the 4R Winnipeg Depot at BRRMF.

Commercial waste and 4R Winnipeg Depot customer visits were based on averages of prior years and months to estimate customers that redirected their waste to other landfills.

The financial impact of the blockade for January 2023 is as follows:

Redirection of residential, multi-family and commercial waste to external landfills	\$166,258
Additional collection contractor costs	\$ 15,888
Redirection of glass from material recycling facility	\$ 10,134
Other costs	\$ 20,448
Lost revenue (estimated)	\$380,841
Total Financial Impact, January 2023	\$593,569

Of the total cost, \$182,146 impacted the tax-supported solid waste collection budget.

- There was a total of 2,682 tonnes of residential, multi-family and commercial waste collected under contract with the City of Winnipeg. This waste was disposed of at the Prairie Green Landfill and the Mid Canada Landfill. The cost per tonne charged varied from \$87.45 per tonne to \$93.00 per tonne. The amount reported here is the net difference between the per tonne rate less the internal tipping rate of \$26.60 per tonne should the waste have been disposed of at the BRRMF.
- Additional collection contracts costs totalling \$15,888 have been submitted from one contractor for two collection contracts. It is unknown if further costs are expected from other contractors.
- An over-expenditure report may be required later in 2023.

The remaining \$411,423 impacted the Solid Waste Utility.

- The material recycling facility (MRF) had to redirect 136 tonnes of glass to the Mid Canada Landfill at a cost of \$10,134. Glass would typically be repurposed at the BRRMF and accepted free of charge, however this material was disposed of for a fee. This cost was charged to the Solid Waste Utility similar to the shipping of any marketable commodity from our recycling program.
- Other costs of \$20,448 absorbed by the Solid Waste Utility included signage and security. These costs will continue until protesters end the demonstration.
- The Solid Waste Utility lost revenue estimated at \$380,841 for materials diverted to other landfills. This included:
 - 272 tonnes at a rate of \$61 per tonne for residue redirected from the MRF
 - 2,682 tonnes at a rate of \$16.60 per tonne for residential, multi-family and commercial waste to external landfills
 - Approximately 3,840 tonnes at a rate of \$78 per tonne for commercial waste, and
 - Approximately 1,250 residential customers paying the minimum fee at the 4R Winnipeg Depot at BRRMF.

Commercial waste and 4R Winnipeg Depot customer visits were based on averages of prior years and months to estimate customers that redirected their waste to other landfills.

FINANCIAL IMPACT

Financial Impact Statement

Date: March 6, 2023

Project Name:

**FINANCIAL IMPACT ASSOCIATED WITH BRADY ROAD RESOURCE
MANAGEMENT FACILITY BLOCKADE AND PROTEST**

COMMENTS:

There are no financial implications associated with the recommendations of this report.

Lucy Szkwarek, CPA, CGA

Lucy Szkwarek, CPA, CGA
Manager of Finance and Administration

CONSULTATION

This Report has been prepared in consultation with:

N/A

OURWINNIPEG POLICY ALIGNMENT

This report is in accordance with the OurWinnipeg 2045 policies through

N/A

WINNIPEG CLIMATE ACTION PLAN ALIGNMENT

N/A

WINNIPEG POVERTY REDUCTION STRATEGY ALIGNMENT

Consideration was given as to whether this report connects to the Winnipeg Poverty Reduction Strategy (PRS) and its Goals and Objectives, and it was determined that the PRS is not applicable to this specific report.

SUBMITTED BY

Department: Water and Waste
Division: Finance and Administration
Prepared by: Melissa Bunkowsky
Date: March 6, 2023
File No.: G-288

This is Exhibit “H” referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read 'Sledge', is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba

Posts

Photos



Taylor Orpin



1 hr · 

Hey folks! I'm in desperate need of a winter sleeping bag for the week until I can get my hands on one of my own.

We're camping out at Brady Landfill to ensure no more dumping on our sisters' remains occurs.

Please please let me know if you can help.
Thank you! ❤️

 6

2 Comments



Like



Comment



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Taylor Orpin is with Travis Barsy and 19 others.



Yesterday at 9:18 PM · 

Tomorrow, we are setting up a permanent blockade at the Brady Landfill to protect the remains of our sisters Buffalo Woman, Morgan Harris, Mercedes Myran and other MMIWG2S+ that will undoubtedly be found until a search of the grounds is





Taylor Orpin is with **Mashkode Bizhiki Kapitaatoong** and **18 others**. ...

10h · 🌐

Tomorrow, we are setting up a permanent blockade at the Brady Landfill to protect the remains of our sisters Buffalo Woman, Morgan Harris, Mercedes Myran and other MMIWG2S+ that will undoubtedly be found, until a search of the grounds is completed. Our sisters are not trash!

At City Hall on Thursday, we stood together and demanded that dumping at the landfill ceases immediately. We told our politicians that if they didn't shut it down, we would.

And we meant it. ... [See more](#)





Joseph Alexander Munro is at Brady Landfill.

19h · Winnipeg · 🌐



[#FNIW](#) will be setting up a permanent Blockade at the Brady Landfill, Sunday December 18, 2022.

[#searchthelandfills](#) [#MMIWG](#) [#NoMoreStolenSisters](#)

[#justiceforMorganHarris](#) [#justiceforMercedesMyran](#)

[#justiceforRebeccaContois](#)

[#justiceforBuffaloWoman](#)



SEARCH THE LANDFILL



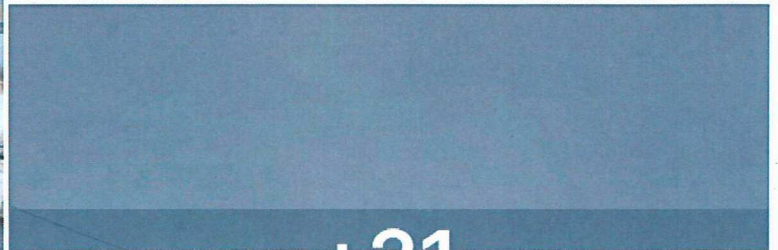
Joseph Alexander Munro

4d · 🌐



Brady Landfill blockade

#searchthelandfills #MMIWG #justiceforRebecca #justiceforMercedes
#justiceforMorgan #justiceforBuffalowoman



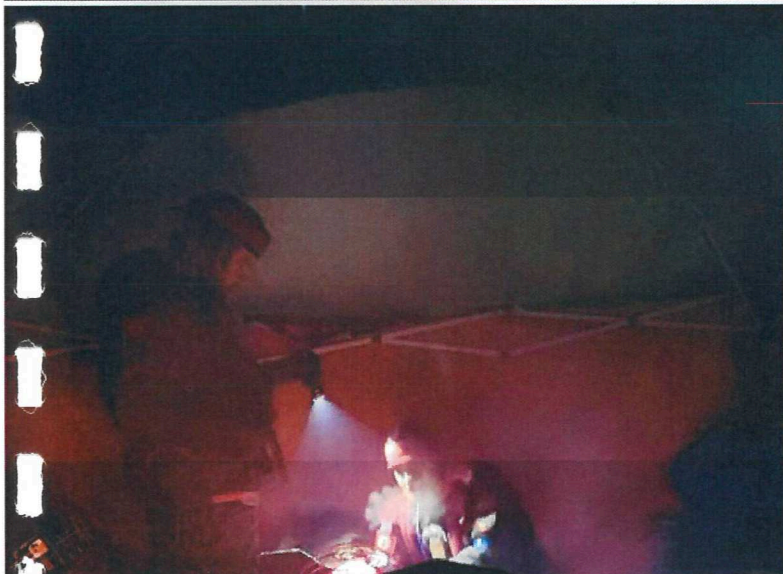
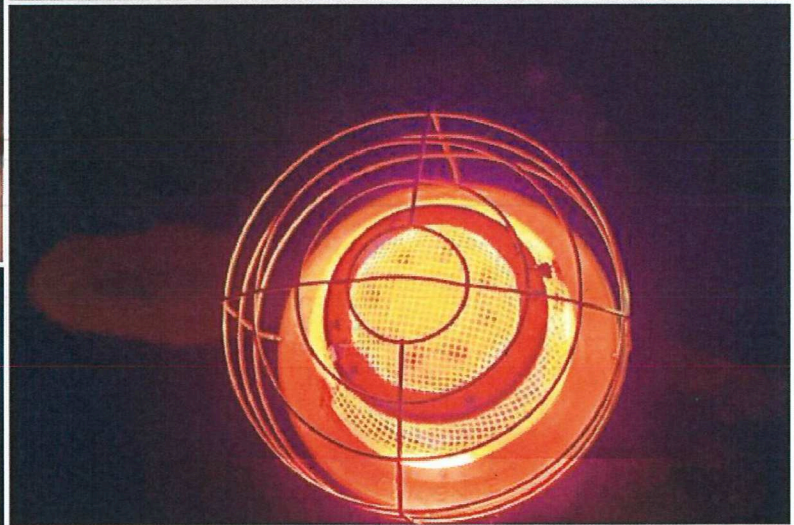
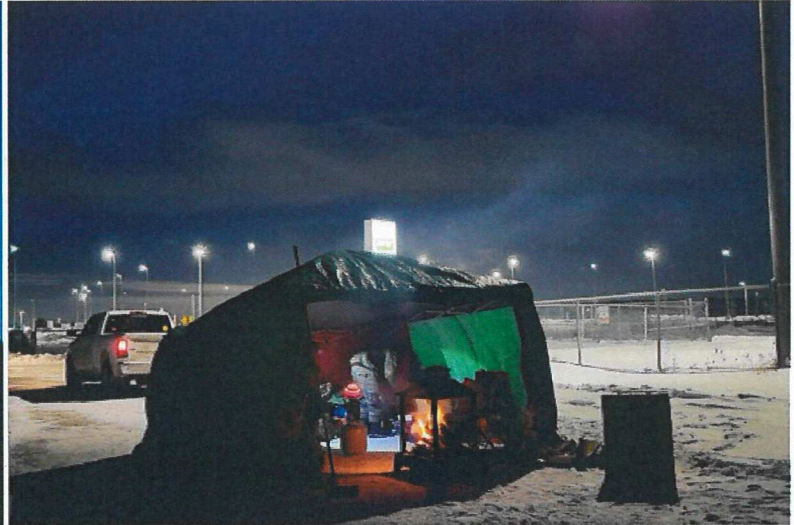
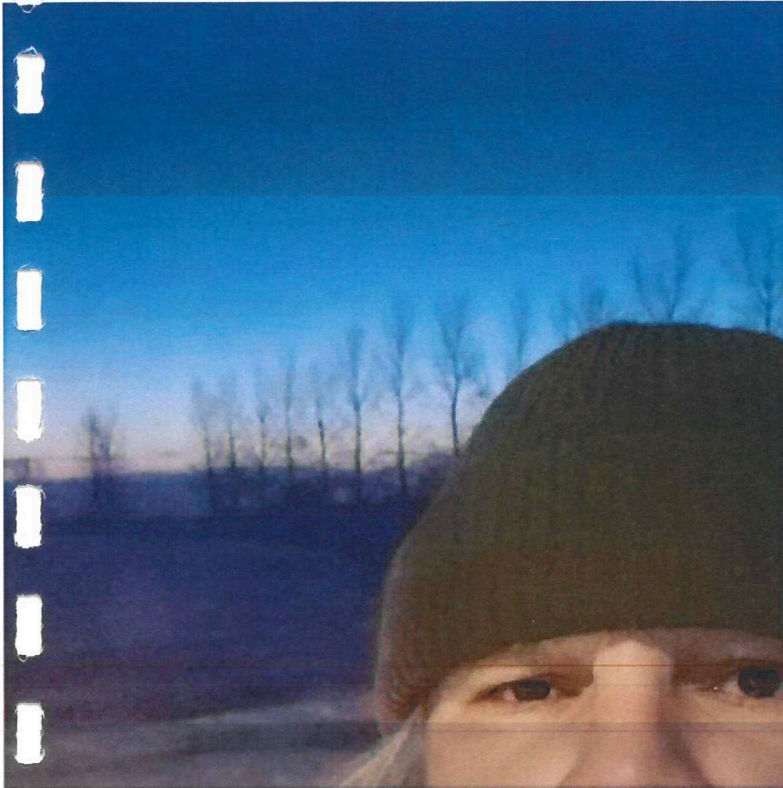


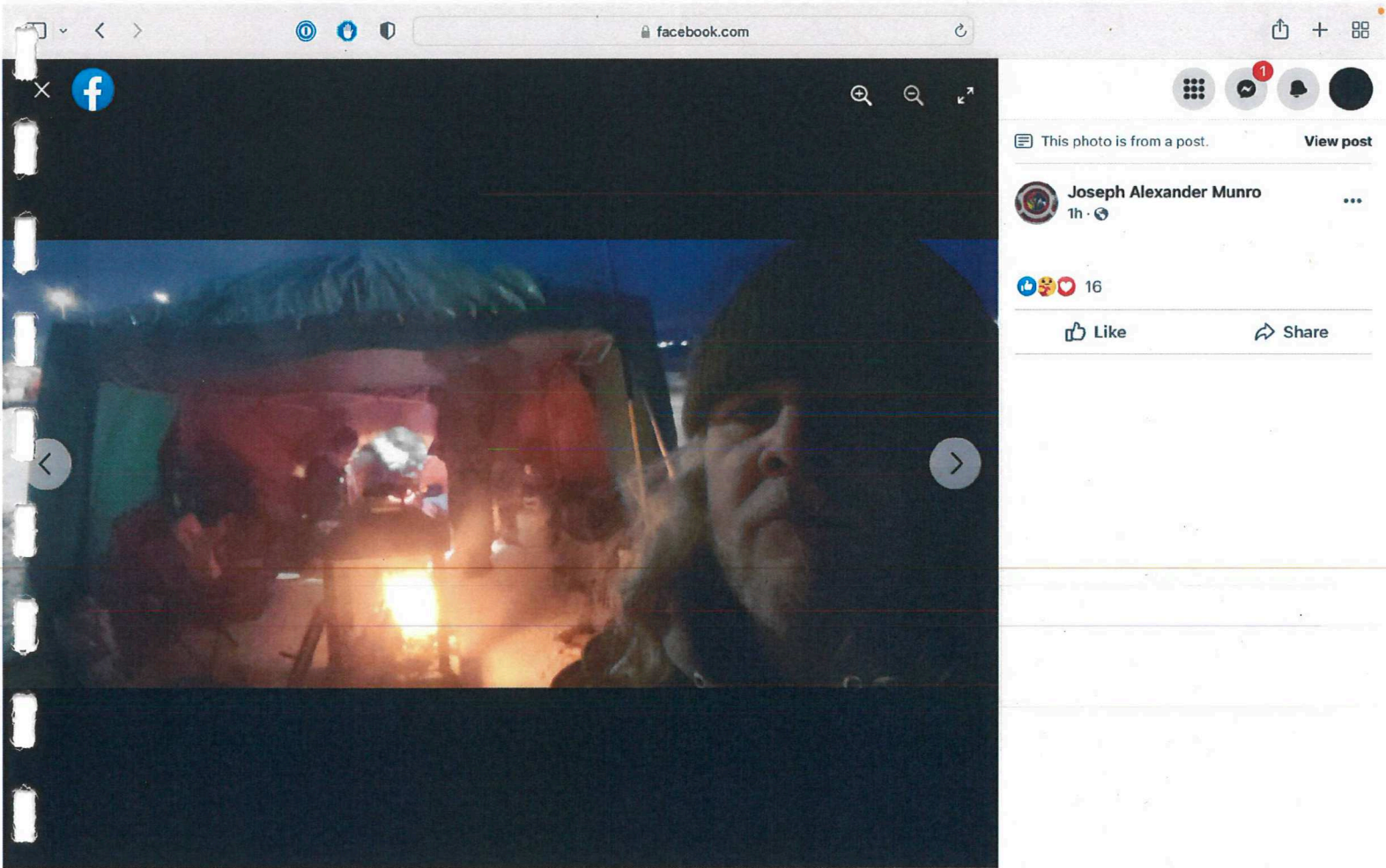
Joseph Alexander Munro

1h · 🌐



The sun setting on the first night
[#FNIW](#) Brady Landfill Encampment
[#searchthelandfills](#)





10:06



Tweet



Waabishkaa Ma'iingan Naakshig

@CrazyNative1492



Rcmp better stay the fuck away from
our territories!

.especially in Manitoba camp

[#Morgan](#)

We are armed this time!

5:31 PM · 2023-03-29 · **105** Views

1 Like



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Tweet your reply





Waabishkaa Ma'iingan Apiichaa



Like



Share



Waabishkaa Ma'iingan Apiichaa



2h ·

Brady landfill will be a fine battle ground between indigenous Resistance and the Army,

I'll die for my sisters as they died for me.

I'll lay my life down & lay up on the cold ground with my mmiw sisters



9 comments 1 share



Like



Share



Waabishkaa Ma'iingan Apiichaa



22h ·



gofundme.com

Children of Linda Beardy Fundraiser OFFICIAL,
organized by Ryan Beardy



5 shares



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Marketplace

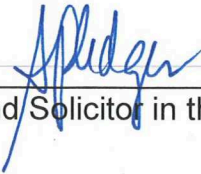


Notifications



Menu

This is Exhibit "I" referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read "J. Plidgen", is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba

Manitoba

Ottawa confirms it will pay for feasibility study of landfill search for women's remains

Assembly of Manitoba Chiefs announced the agreement on Wednesday

[Caitlyn Gowriluk](#) · CBC News · Posted: Dec 15, 2022 3:39 PM CST | Last Updated: December 15, 2022



A small group of demonstrators lit a sacred fire and laid tobacco down on Dec. 11 outside the Prairie Green landfill, where the remains of two First Nations women allegedly killed by the same man are believed to be. (Randall McKenzie/CBC)

WARNING: This story contains distressing details.

The federal government has confirmed it will cover the cost of a feasibility study for a potential search of a landfill near Winnipeg that's believed to contain the remains of two First Nations women police allege were killed by the same man.

Marc Miller, Canada's minister of Crown-Indigenous relations, said on Thursday the federal government confirmed that agreement on Wednesday with Cathy Merrick, grand chief of the Assembly of Manitoba Chiefs.

Merrick had already [announced the agreement](#) herself that day, saying a local anthropologist would conduct the study along with members of the Winnipeg Police Service, members of Long Plain First Nation — which the slain women were also members of — and a member of the Assembly of Manitoba Chiefs.

Miller said the feasibility study on the potential search of the Prairie Green landfill north of Winnipeg "will set the stages for the next conversations that we'll have with the families, foremost, in the search for closure."

"It's a site that is full of a number of complexities and we're glad to deploy the resources the federal government can," he said after question period in Ottawa.

WATCH | Federal minister pledges to pay for feasibility study on landfill search:



Ottawa to fund study into landfill search for murdered women's remains

7 months ago | 2:04

The federal government says it will provide funding for a feasibility study into the potential search of a landfill near Winnipeg believed to contain the remains of two First Nations women police say were killed by the same man.

Miller had previously [promised support of some kind](#), but stopped short of committing specifically to federal money to cover any costs of a search, while Prime Minister Justin Trudeau had suggested federal cash may be coming.

Manitoba Premier Heather Stefanson said operations at Prairie Green landfill were [paused last week](#), meaning nothing new has been coming into the site.

Only one victim's remains found

The study will be the first step in determining what will happen at the Prairie Green landfill, which police say they believe holds the remains of Mercedes Myran and Morgan Harris, two of the four victims of alleged serial killer Jeremy Skibicki.

Skibicki is charged with first-degree murder in those women's deaths and in the deaths of Rebecca Contois and an unidentified woman who members of the Indigenous community [have](#)

[named Mashkode Bizhiki'ikwe, or Buffalo Woman.](#)

Skibicki's lawyer has said his client [intends to plead not guilty](#) to all four charges.

Contois's partial remains were [located in June at the Brady Road landfill](#) in south Winnipeg. Police have said they don't know where Buffalo Woman's remains are.



Elle Harris, 18, is one of the daughters of Morgan Harris, who police allege was one of four women killed by Jeremy Skibicki. She wants the landfill believed to hold her mother's remains to be searched. (Fernand Detillieux/Radio-Canada)

And while they believe Myran and Harris's remains are at Prairie Green, police said it [wouldn't be feasible to search](#) for them there.

That decision has left families like that of Elle Harris, the daughter of Morgan Harris, unable to properly mourn their loss.



Demonstrators called for a search of both the Prairie Green and Brady Road landfills at a rally outside Winnipeg's city hall on Thursday. (Bartley Kives/CBC)

"We all want to have funerals. We want the closure, which we can't get because nobody's looking for them," the 18-year-old said at a rally Thursday outside city hall, where demonstrators called for a search of both the Prairie Green and Brady Road landfills.

While Harris's daughter said she was glad to see support for the feasibility study, she's not convinced a search will happen.

"They say they care, but they don't. Because if they cared, we wouldn't have to be coming out for these rallies. We wouldn't have to be protesting about finding our mother's body," she said.

Next steps

Miller said the federal government plans to work with the Winnipeg Police Service, the province of Manitoba and the mayor's office in Winnipeg to ensure a co-ordinated approach to "what is a very, very difficult situation."

"We don't want to be tripping over each other. We want to make sure we're doing this in a way that is sensitive to the needs of the families," he said.

Winnipeg Mayor Scott Gillingham said he's been in regular contact with Grand Chief Merrick, who he said has been leading the conversations around the potential landfill search along with Long Plain First Nation Chief Kyra Wilson.

- [A timeline of what we know about 4 slain Winnipeg women and alleged serial killer Jeremy Skibicki](#)

A committee struck to guide those discussions was scheduled to meet later Thursday, he said during a break of a council meeting at city hall.

Gillingham said the scale, timing and cost of a potential search have not yet been determined, and a decision hasn't yet been made on whether the study will include the city's Brady Road landfill.

If that site does end up being searched, Gillingham said he's communicated he wants to find a way to isolate the areas in question and keep using the parts of the landfill that aren't needed for the search.

Miller said the culturally sensitive feasibility study will determine what resources are available through police, the province and the federal government and "to see what resources are necessary to recover bodies."

The update comes after [Manitoba First Nations leaders and Indigenous groups sent a letter](#) earlier this week calling on the federal government to fund their landfill search and to call in the United Nations for support.

Support is available for anyone affected by details of this case. If you require support, you can contact Ka Ni Kanichihk's Medicine Bear Counselling, Support and Elder Services at 204-594-6500, ext. 102 or 104, (within Winnipeg) or 1-888-953-5264 (outside Winnipeg).

Support is also available via Manitoba Keewatinowi Okimakanak's Missing and Murdered Indigenous Women and Girls Liaison unit at [1-800-442-0488](tel:1-800-442-0488) or [204-677-1648](tel:204-677-1648).

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This is Exhibit "J" referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read 'A. Pledes', is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba



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Public information, contact
Manitoba Government Inquiry:
1-866-626-4862 or 204-945-
3744.

Media requests for general
information, contact
Communications and
Engagement:
newsroom@gov.mb.ca.

Media requests for ministerial
comment, contact
Communications and
Stakeholder Relations: 204-451-
7109.

Twitter Feed

News Release - Manitoba

July 5, 2023

STATEMENT FROM PREMIER HEATHER STEFANSON AND INDIGENOUS RECONCILIATION AND NORTHERN RELATIONS MINISTER EILEEN CLARKE ON THE FINAL REPORT OF THE LANDFILL SEARCH FEASIBILITY STUDY COMMITTEE

On behalf of our government and all Manitobans, our deepest condolences continue to go out to the families and loved ones mourning the tragic loss of Morgan Harris, Mercedes Myran, Rebecca Contois, and Buffalo Woman.

Today, we met with a number of family members and Indigenous leadership. In that meeting, we stressed the Manitoba government is prepared to support a memorial, which we hope other levels of government and Indigenous leadership will support as well.

We further committed to continuing and enhancing our comprehensive approach to preventing these types of tragedies from happening, and we wish to work closely with the leadership we met with today, and the families, to ensure this approach is working. We will continue to address the many sources of violence against Indigenous women and girls, including domestic and partner abuse, and other exploitation, while continuing our collaboration and investments in mental health supports and to address homelessness.

For those families whose pain we cannot imagine, we have also offered supports from the Department of Mental Health and Community Wellness to help with their healing process.

We understand that federal Crown-Indigenous Relations Minister Marc Miller is in the process of reviewing the federally funded feasibility study and recommendations surrounding the Prairie Green landfill, and that a federal decision is forthcoming. We look forward to receiving those federal conclusions.

While we await the federal government's response, we also emphasize the importance of focusing on ensuring an effective judicial process to ensure justice is served. We note that the technical subcommittee has named safety as the highest priority. We understand the desire to leave no stone unturned. However, the search process described in the report is complex, and comes with long-term human health and safety concerns that simply cannot be ignored.

Based on the report, we cannot knowingly risk Manitoba workers' health and safety for a search without a guarantee. As stated in the report, the emotional costs associated with conducting a search and not recovering remains must be considered, as should the emotional costs associated with potential delays and the duration of a search.

Again, our hearts go out to the families and communities, and we will continue our efforts to create a Manitoba where everyone feels safe and valued.

- 30 -

Send an email / Envoyer un courriel



Tweets from @MBGov



Nothing t yet

When they Tweet, thei

[View on Twitter](#)

For more information:

- Public information, contact Manitoba Government Inquiry: 1-866-626-4862 or 204-945-3744.
- Media requests for general information, contact Communications and Engagement: newsroom@gov.mb.ca.
- Media requests for ministerial comment, contact Communications and Stakeholder Relations: 204-451-7109.

Quick Links

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[Manitoba Advocate for Children
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[Manitoba Public Insurance](#)

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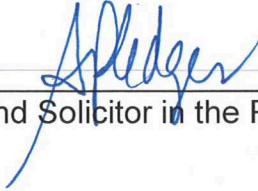
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This is Exhibit “K” referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read 'A. Pledger', is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba

< Waabishkaa Ma'iingan Apiic... 🔍

Apiichaa

1d · 🌐

At last, if the meeting for July 5th doesn't go well! If Heather Stefanson fails this meeting to address both the Brady landfill & Prarie green land fills! Definitely shutting shit down by force & highways could be occupied & if police cause tensions, we will barricade things up... idk depends on how things go... but a call to action will be announced after the meeting in July, when the family of Morgan Harris attends, we will be their for them & with them 🦊 🦊 ❤️ ❤️
Camp #Morgan will prevail !

👍❤️ 30

2 comments 2 shares



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Dating



Notifications

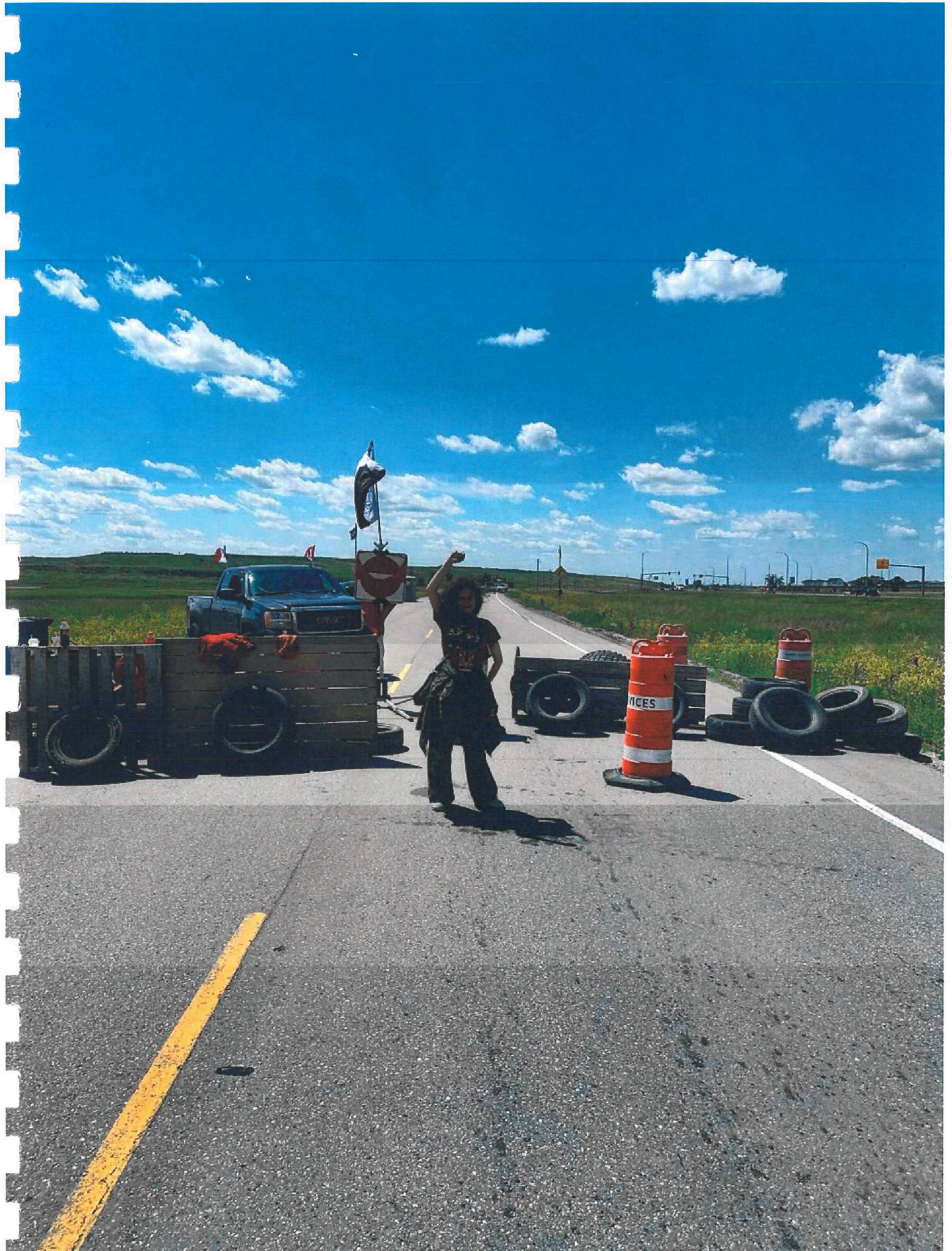


Menu

This is Exhibit "L" referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read "A. Sledge", is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba





Cambria Harris

4 days ago · 🌐

...

You can thank Heather Stefansson for this, this is a inconvenience for the dump, but so is leaving indigenous women's body in a landfill, like my mother Morgan Harris and Mercedes Myran.

Come support and help block this road today with our warriors.

[#searchthelandfills](#) [#campmorgan](#)



28

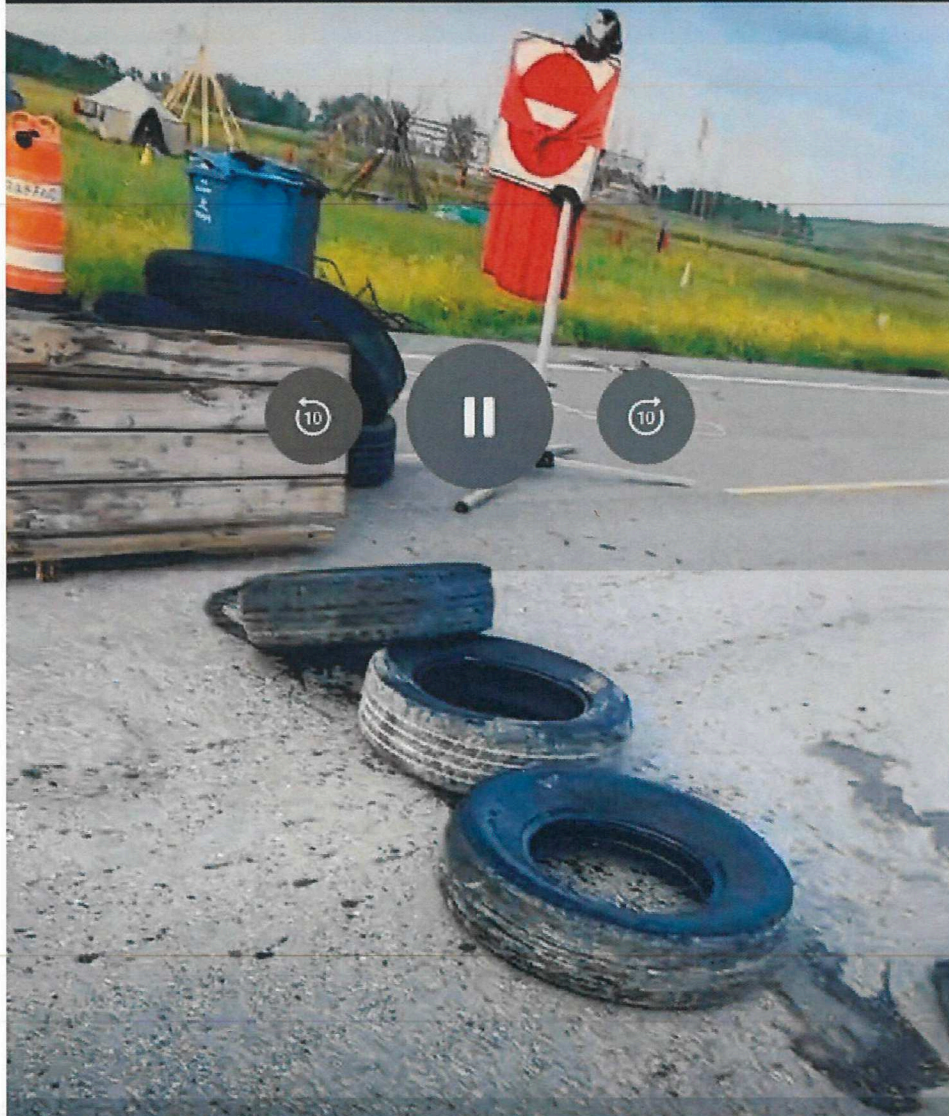
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9:15



Was live



Waabishkaa Ma'iingan A...

Follow

Barricades beginning

👍 62

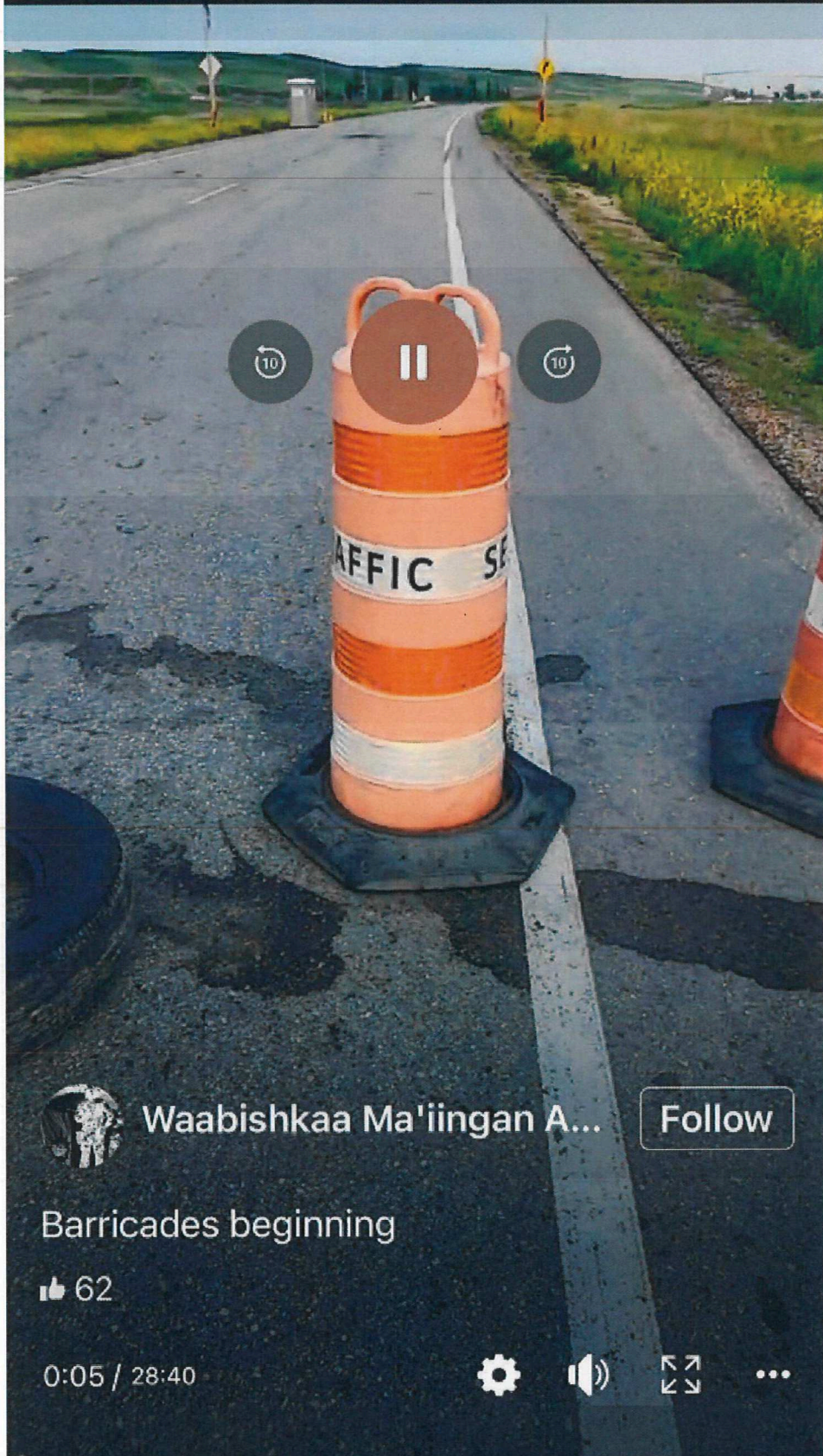
0:07 / 28:40



9:15



Was live



Waabishkaa Ma'ingan A...

Follow

Barricades beginning

👍 62

0:05 / 28:40



9:16



Was live



Comment...



Comments

9:15



< Waabishkaa Ma'iingan Apiich... 🔍



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Waabishkaa Ma'iingan Apiichaa ...

was live.

18h · 🌐

Camp Morgan update blockade up



Add friend



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Marketplace



Notifications



Menu

See attached USB for video

This is Exhibit "**M**" referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read 'A. Pledge', is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba



**Chief Administrative Office
Direction municipale**

July 7, 2023

Re: Blockade at Brady Road Resource Management Facility

The operation of the Brady Road Resource Management Facility by the City of Winnipeg is an essential service for the residents of Winnipeg and surrounding area, to collect waste and to prevent contamination of the environment and ground water.

Over the past seven months, the City of Winnipeg has cooperated with individuals who wished to conduct peaceful protests near the Facility, in a manner that does not pose a risk to the environment or the public.

On or about July 7, 2023, individuals have fully blocked access to the Facility by placing obstacles and other items on the main roadway. Information received by the City of Winnipeg suggests an intention to block access to the Facility for an unspecified period of time. The blocking of the roadway is preventing the continued uninterrupted operation of the Facility, and these recent actions have required the City of Winnipeg to close the Facility for an unspecified period of time.

These actions are violations of both City By-laws and provisions of provincial legislation. These actions also place the City of Winnipeg at risk of violating the environmental licence required to operate the Facility.

I have determined these actions constitute an emergency to the health and safety of the citizens of Winnipeg and users of the Facility as defined in The City of Winnipeg Charter and the Emergency Management By-law 59/2020.

NOTICE OF IMMEDIATE ACTION

All individuals occupying the roadway, causing the roadway to be blocked, or otherwise preventing access to the Facility are hereby required to vacate the roadway and restore full access to Facility no later than Monday July 10, 2023 at 12:00 p.m.

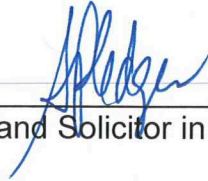
In the event the blockade remains, the City of Winnipeg may take further action, including through the courts, without further notice.

Michael A Jack
Chief Administrative Officer

—
Office of the Chief Administrative Officer
2nd Floor, 510 Main St., Winnipeg, MB R3B 1B9
Bureau de directeur municipal
2^e étage, 510, rue Main, Winnipeg (Manitoba) R3B 1B9

T. | Tél. : 204-986-2323
F. | Fax : 204-944-1174
winnipeg.ca

This is Exhibit “N” referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to be 'J. P. [unclear]', written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba

See attached USB for video

This is Exhibit "O" referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read "A. Pledge", is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba



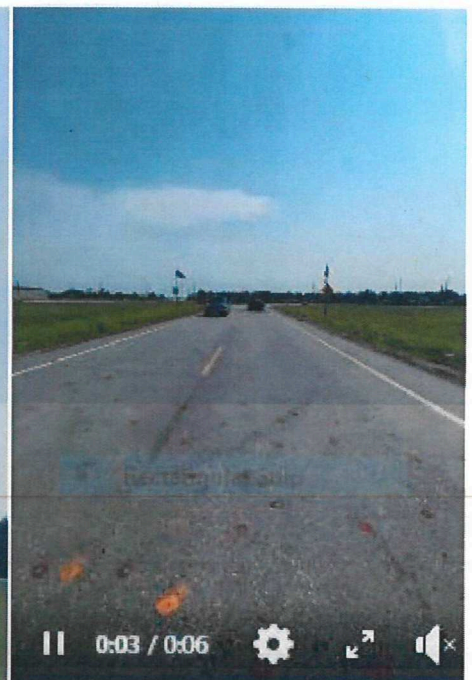
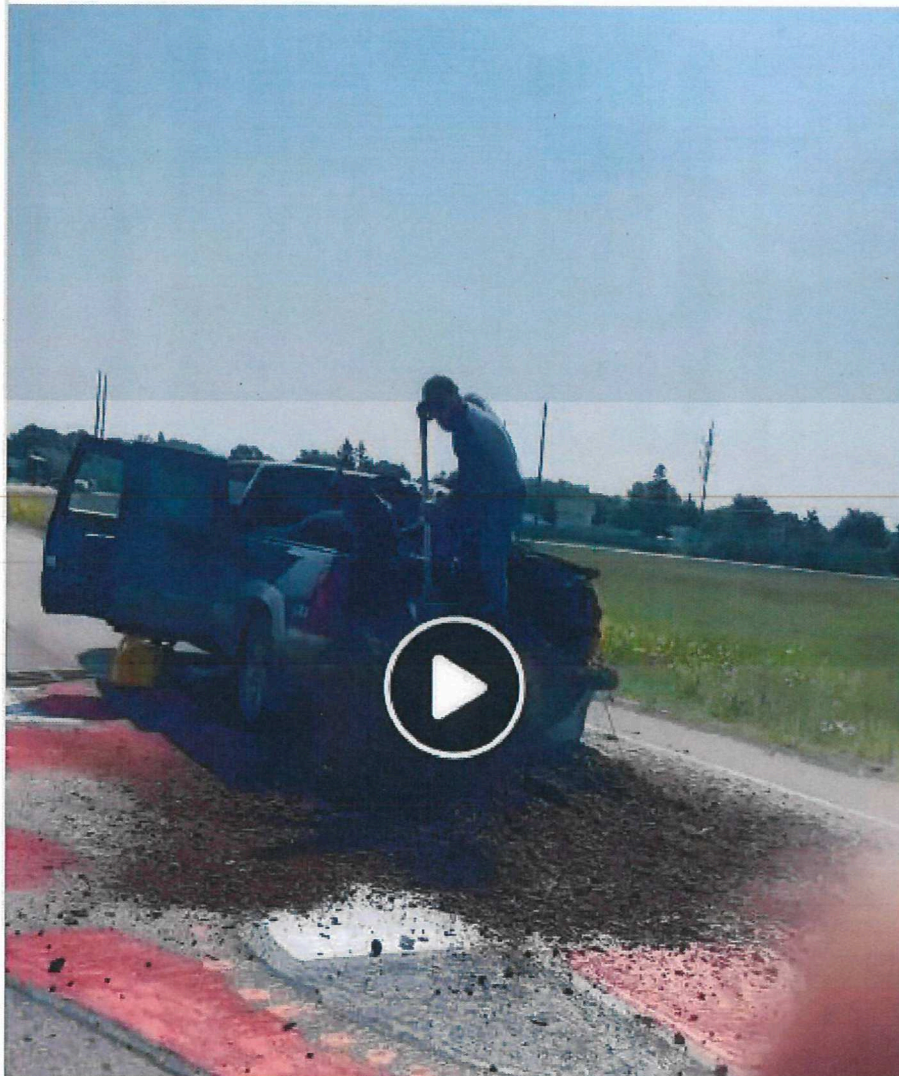
Cambria Harris

a day ago · 🌐

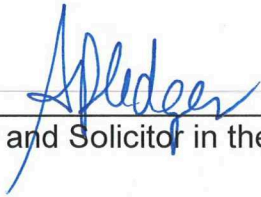


BACKUP NEEDED! COMMUNITY, ITS TIME TO RISE UP!

An angry settler has been spotted at camp Morgan going passed impact security, towards camp and dumped on top of a ceremonial red dress symbol with his soil as he screamed profanities at the warrior present holding the blockade down. The man who sits there with that ideology so proud with his shovel, is the same type of man that won't hesitate to murder an indigenous person because his mindset says it all! These are the same typ... [See more](#)



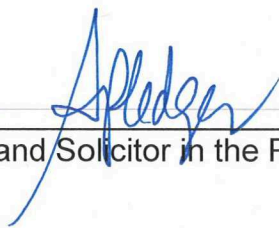
This is Exhibit “P” referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read 'A. Pledge', is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba



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A handwritten signature in blue ink, appearing to read 'A. Pledgen', is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba



Kyra Wilson

July 9 at 4:18 PM · 🌐



Tomorrow morning, the City of Winnipeg and WPS will be attending Camp Morgan in an attempt to shut it down. They have stated they will start arresting people.

What are you willing to do to support Camp Morgan?

[#searchthelandfills](#)

35



9 comments 92 shares

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This is Exhibit “**R**” referred to in the Affidavit of Michael Gordichuk, affirmed before me at the City of Winnipeg, in the Province of Manitoba, this 11th day of July, 2023.

A handwritten signature in blue ink, appearing to read "A. Pledge", is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba







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A handwritten signature in blue ink, appearing to read "A. Pledger", is written over a horizontal line.

A Barrister and Solicitor in the Province of Manitoba

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PRESS RELEASES

AMC Expresses Deep Disappointment over the City of Winnipeg's Decision to Dismantle Camp Morgan and Imposition of an Injunction on the Blockade



JULY 10, 2023

TREATY ONE TERRITORY, MANITOBA

AMC COMMUNICATIONS



Assembly of Manitoba Chiefs
EMPOWERING OUR NATIONS



Treaty One Territory, Manitoba – The Assembly of Manitoba Chiefs (AMC) and Chief Kyra Wilson of Long Plain First Nation express profound disappointment over the City of Winnipeg's decision to dismantle Camp Morgan, a sacred camp believed to be the burial site of three First Nations women. The AMC is also concerned about the injunction imposed on the Camp Morgan blockade, hindering efforts to seek justice for Missing and Murdered Indigenous Women, Girls, and 2Spirit (MMIWG2S+) in Manitoba.

"Camp Morgan, an important symbol of remembrance and healing, has been a place of unity and solidarity for families affected by the tragic loss of their loved ones by Winnipeg's latest serial killer," said Grand Chief Cathy Merrick. "It has served as a powerful reminder of the urgent need to address the systemic issues perpetuating violence against First Nations women and girls in our province. It is a place where we have gathered to remind our missing loved ones and those who have tried to stop us that we won't give up on these women."

"The dismantling of Camp Morgan and the imposition of an injunction on the blockade not only disregards the wishes of the families who have been seeking justice for their loved ones but also sends a distressing message to First Nations citizens that their pain and calls for justice are being ignored," Chief Kyra Wilson said. "This action is deeply disheartening and counterproductive to the efforts of reconciliation and healing. If you want the camp to move, honour the feasibility study and the work ahead instead of trying to brush us under the rug again."

The AMC firmly believes that dismantling Camp Morgan without a comprehensive plan to investigate the disappearance of the three First Nations women is a setback for justice. It undermines the trust and confidence of First Nations, reinforcing the already prevalent skepticism towards the justice system's commitment to addressing the MMIWG crisis.

In light of recent developments, the AMC also highlights the government's decision to excavate hazardous material at the Parliamentary Building in



Assembly of Manitoba Chiefs
EMPOWERING OUR NATIONS

nearly 5 billion dollars for both buildings and take a decade to complete, contrasts the lack of investment and urgency in addressing the MMIWG issue. The excavation has already consumed 500 million dollars.

"The government's willingness to allocate significant funds for excavation purposes while neglecting the critical issue of missing and murdered Indigenous women, girls, and 2Spirit is disheartening. It highlights the ongoing marginalization faced by First Nations citizens," said Grand Chief Merrick.

The AMC calls on the Winnipeg Police Service and relevant government authorities to reconsider their decision and engage in meaningful consultations with impacted families, First Nations leadership, and grassroots organizations. The voices and concerns of those affected must be heard and respected. Additionally, the AMC urges the provincial and federal governments to prioritize an independent, culturally sensitive inquiry into the systemic causes of MMIWG2S+ cases in Manitoba.

The AMC remains dedicated to advocating for the rights and safety of First Nations women and girls, working towards justice, healing, and reconciliation.

For more information, please contact:

Communications Team

Assembly of Manitoba Chiefs

Email: media@manitobachiefs.com

About the Assembly of Manitoba Chiefs

The AMC was formed in 1988 by the Chiefs in Manitoba to advocate on issues that commonly affect First Nations in Manitoba. AMC is an authorized representative of 62 of the 63 First Nations in Manitoba with a total of more than 151,000 First Nation citizens in the province, accounting for approximately 12 percent of the provincial population. AMC represents a diversity of Anishinaabe (Ojibway), Nehetho / Ininew (Cree), Anishininew



Assembly of Manitoba Chiefs
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AMC SUB-OFFICE

200-275 Portage Avenue



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