



TECHNICAL REVIEW COMMITTEE

**A TECHNICAL REVIEW REPORT
PREPARED FOR THE**

RM of Ste. Anne

Manova (2012) Ltd.

RL 29 & 30-AN-3625

TR 12-106

August 27, 2024

A. INTRODUCTION – THE TEAM

The Technical Review Committee (TRC) is supported by the following department personnel:

Agriculture (AGR)

- Agri-Resource Engineer
- Business Development Specialists
- Veterinarians
- Agri-Ecosystem Specialists

Economic Development, Investment, Trade and Natural Resources (EDITNR)

- Crown Lands Manager
- Fish Habitat Specialist
- Habitat Mitigation Biologist

Environment and Climate Change (ECC)

- Environmental Engineer
- Environment Officer
- Water Rights Licensing Technologist
- Land-Water Specialist
- Groundwater Specialist

Manitoba Transportation and Infrastructure (MTI)

- Senior Development Review Technologist
- Senior Flood Protection Planning Officer

Municipal and Northern Relations (MNR)

- Community Planners

And any other specialist or department that may have an interest or is consulted during the TRC process.

THE TECHNICAL REVIEW COMMITTEE (TRC) REPORT

Purpose of TRC Reports

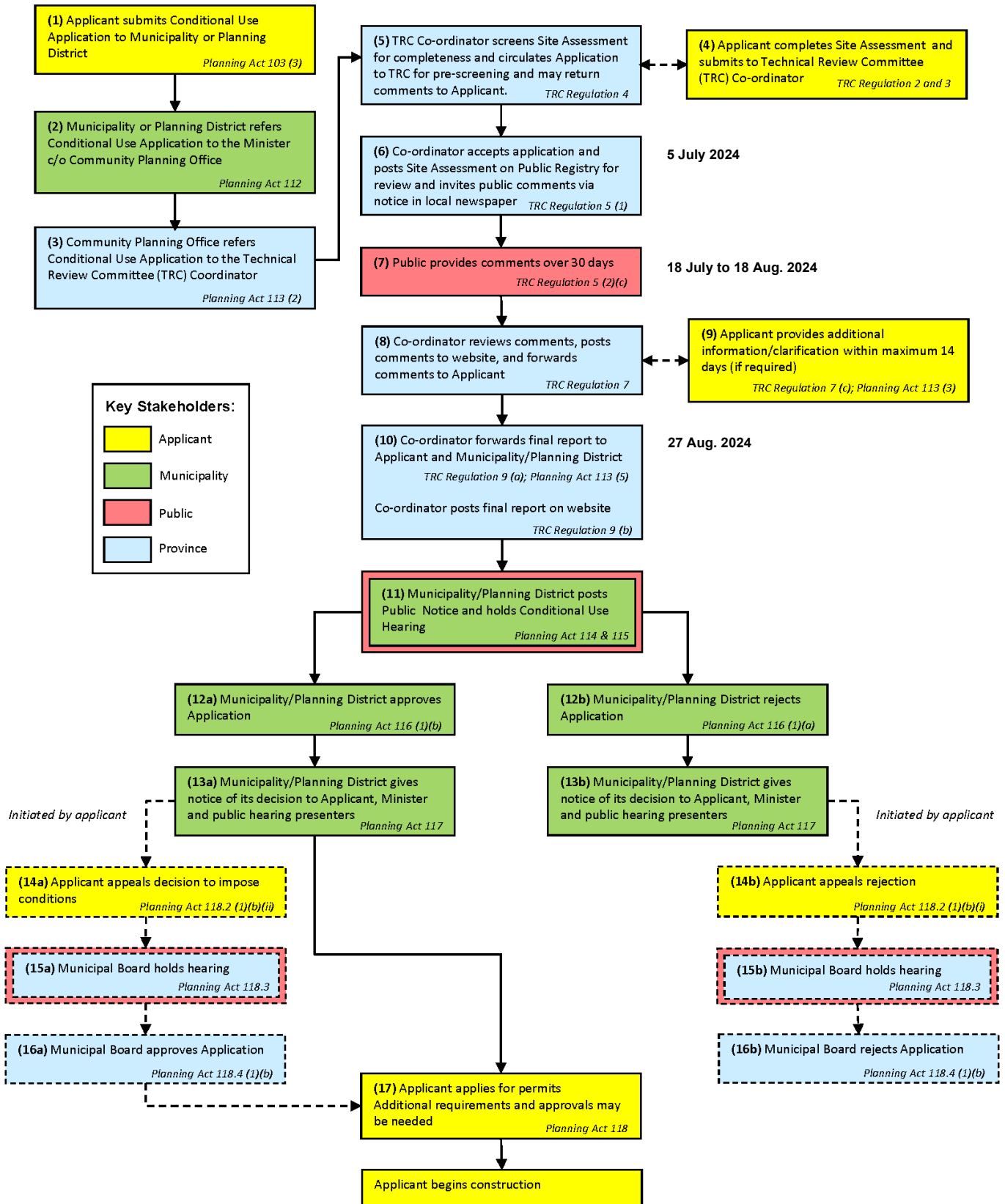
To provide objective, credible, technically-based assessments that:

- a) Enable municipal councils or planning district boards to make informed decisions regarding Conditional Use applications;
- b) Create common stakeholder understanding regarding livestock proposals, their potential impacts, and related regulatory requirements and safeguards;
- c) Provide a vehicle/forum that enables the sharing of public concerns and proponent responses;
- d) Offer recommendations to both councils/boards and proponents; and
- e) Represent the fulfillment of the TRC's role, as per 116(1)(b)(i) of *The Planning Act* – to determine, based on available information, that the proposed operation will not create a risk to health, safety or the environment, or that any risk can be minimized through the use of appropriate practices, measure and safeguards.

Should a municipal council or planning district board provide conditional approval of a proposal, the project proponent may be required to obtain various permits and licenses from the Province to address in greater detail environmental aspects of the proposal. As of November 1, 2019, a proponent may appeal a council/board's rejection of their application or appeal a condition imposed on the approval of a council/board to the Municipal Board.

Livestock Technical Review Process

(June 19, 2024)



B. DESCRIPTION OF PROPOSED LIVESTOCK OPERATION

Further information may be found at https://www.gov.mb.ca/mr/livestock/public_registries.html

Applicant: Harley Siemens

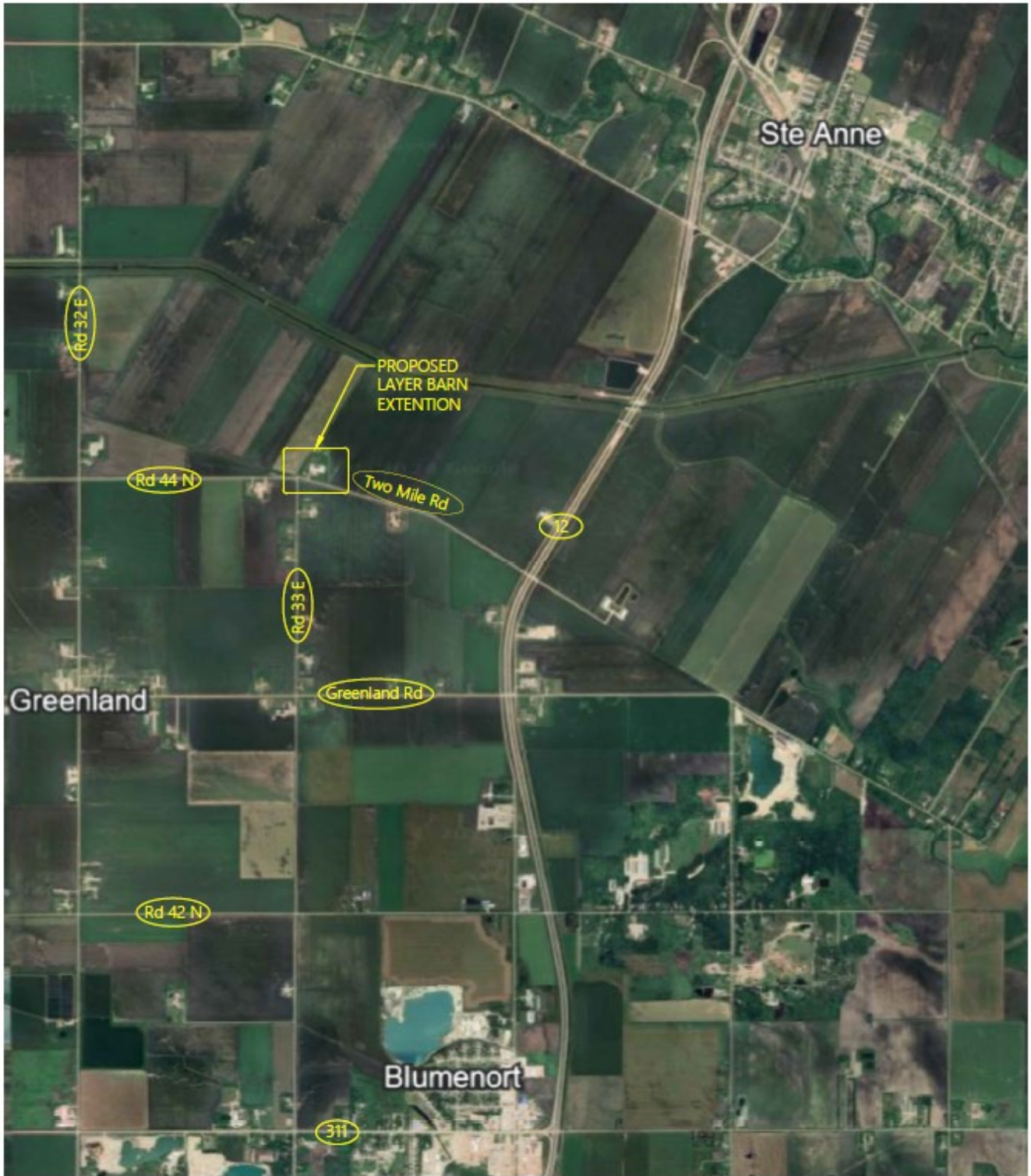
Site Location: RL 29 & 30-AN-3625 (Refer to map below)

Proposal: The applicant proposes to expand an existing barn to house 71,000 layer chickens (<589 AU) in free run housing. The proposal involves increasing the operation from 398 Animal Units to 589 Animal Units.

This will involve the following:

- Use and expansion of existing layer barn,
- Use of existing solid manure storage and packing room,
- Estimated daily water use of 4328.5 imperial gallons from existing well,
- Composting of mortalities, and
- Truck haul routes as shown in map below.

Location Map



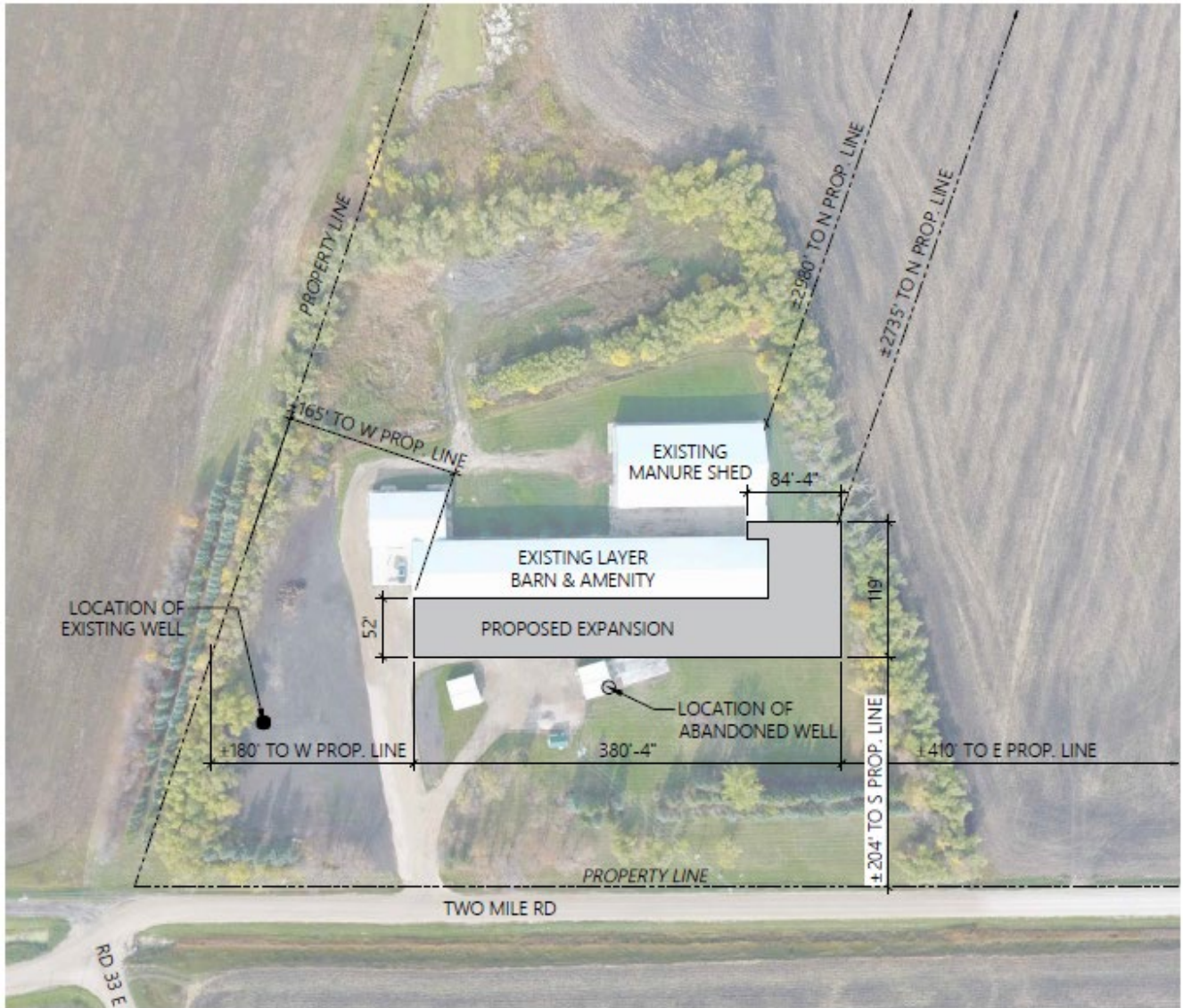
MANOVA (2012) LTD SITE LOCATION

RM OF STE ANNE
33011 TWO MILE RD
DESC RL29/30-AN-3625



PREPARED BY:
PENFOR CONSTRUCTION

Project Site Plan



MANOVA (2012) LTD SITE LOCATION

RM OF STE ANNE
 33011 TWO MILE RD
 DESC RL29/30-AN-3625
 FRONTAGE OR AREA: 65.39 ACRES



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 PENFOR CONSTRUCTION

Spread Field Map



LEGEND

- Existing Operation
- Parcel Boundaries
- Spread Fields
- Municipal Boundaries
- O/C/L/A Own/Crown/Lease/Agreement

Dryland Agricultural Capability

- Class 1 (Most Capable)
- Class 2
- Class 3
- Class 4
- Class 5
- Class 6
- Class 7 (Least Capable)
- Water
- Organic
- Unclassified land
- Modified land
- Urban land



MANOVA (2012) LTD SITE LOCATION
 RM OF STE ANNE
 33011 TWO MILE RD
 DESC RL29/30-AN-3625



PREPARED BY:
 PENFOR CONSTRUCTION

Truck Haul Route Map



MANOVA (2012) LTD SITE LOCATION
RM OF STE ANNE
33011 TWO MILE RD
DESC RL29/30-AN-3625

- LEGEND
- TRUCK HAUL ROUTE
 - PROVINCIAL ROAD OR TRUNK HIGHWAY
 - EXISTING OPERATION


North
PREPARED BY:
PENFOR CONSTRUCTION

C. SITE ASSESSMENT OVERVIEW

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
1	Description of Operation and Nature of Project	The applicant has applied for a conditional use order that proposes an expansion to an existing livestock operation. This expansion would result in an increase from 397 AU to 589 AU to accommodate 71,000 layers. As per section 112 of <i>The Planning Act</i> , Conditional Use Orders involving 300 or more animal units must be referred to the Community Planning Branch (MNR), which coordinates the provincial review of the application.	MNR
2	Type and Size of Operation	Manova (2012) Ltd is seeking Conditional Use approval to expand their existing layer operation to 71,000 layers or 589 AU.	AGR
3	Animal Confinement Facilities	A 3,432 ft ² (66 ft x 52 ft) expansion of the existing barn (animal confinement facility) is proposed to accommodate the increased number of animals. A building permit must first be issued by the RM of Hanover as required by the Inspection and Technical Services Branch, Department of Labour and Immigration, under Manitoba Building Code Regulation M.R. 78/2023. For more information, see the Inspection and Technical Services Branch website: https://www.gov.mb.ca/labour/its/bldg_codes/permits_and_inspections.html and the RM of Ste. Anne website: https://www.rmofsteanne.com/main.php?p=159	MNR
4	Confined Livestock Areas	Not a Confined Livestock Area under the Livestock Manure and Mortalities Regulation.	ECC
5	Project Sites Unsuitable for Development	The project site is not located within Nutrient Management Zone N4 or any Nutrient Buffer Zone.	ECC
6	Water Source: Well Water Requirements of 19,677.4 litres per day	Based on the water consumption information provided, this proponent is not required to apply for a Water Rights Licence under <i>The Water Rights Act</i> since water consumption is below the licensing threshold of 25,000L/day.	ECC
7	Development Plan	<i>The Planning Act</i> requires that development plans include a livestock operation policy that guides zoning by-laws dealing with livestock operations. <i>The Planning Act</i> requires that municipalities issue a development permit before any development takes place on a site. All development must comply with the Zoning By-law and Development Plan. Any proposed development that does not comply with required separation distances or setbacks must obtain Council approval following public hearing to vary those requirements. Designation The site of the proposed livestock operation, located in Pt. of RL 29 & 30 Parish of Ste. Anne in the RM of Ste. Anne, is designated Agricultural Areas (RM of Ste. Anne Development Plan By-law No. 05-2020). The proposal complies with Development Policies 5.6.1-5.6.11 (Livestock Policies).	MNR

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
8	Zoning By-Law	<p>Zoning</p> <p>The site of the proposed operation is zoned “A” Agriculture (RM of Ste. Anne Zoning By-law No. 2023-13) with a minimum site area requirement of 80 acres and a minimum site width requirement of 1000 feet.</p> <p>At 65.39 acres in area and 955 feet site width, the proposed operation does not meet the minimum site requirements for Livestock Operations in the “A” zone. The RM of Ste. Anne advises that no variances have been issued for the undersized site area and width to date.</p> <p>While the non-conformity will not increase as a result of the livestock operation expansion, it is recommended that Council require the applicant to obtain all necessary variances as a condition of approval to bring the operation into compliance with the zoning by-law.</p>	MNR
9	Separation Distances	<p>The proposed expansion increases the separation distances required. Applicable separation distances are for the 401-800 AU range.</p> <p>The proposed expansion of the animal confinement facility is located more than 820 feet from the nearest residence, located on Roll No. 109900.</p> <p>The proposed expansion is located more than 4,364 feet from the nearest non-agriculturally designated area (Settlement Centre of Greenland).</p> <p>No variances for separation distances are required.</p>	MNR
10	Abandoned Wells	<p>The proposal identifies that the water use for the proposed livestock operation is from the existing well located at 33011 Two Mile Rd. The provincial water well database contains information for a well associated with the proposed livestock operation.</p> <p>The proposal indicates that an abandoned well is present on the site. Environment and Climate Change (ECC) requires that the abandoned well be properly sealed and a sealed well report filed with the Groundwater Management Section of ECC.</p> <p>The provincial database indicates that wells are also present on the manure spread fields. It is expected that the proponent will attempt to identify these wells and, if any of these wells are in use, maintain a minimum buffer during manure spreading as outlined in the Livestock Manure and Mortalities Management Regulation. The wells should be properly sealed if not in use and a sealed well report filed with the Groundwater Management Section of ECC.</p> <p>A well drilling professional should seal all but the most basic wells. A list of currently licensed well drilling professionals can also be accessed from the above web page.</p> <p>Information on well sealing and well sealing reports are available from MB Environment and Climate Change (204-945-6959) or: https://www.gov.mb.ca/water/groundwater/wells_groundwater/index.html.</p> <p>During manure spreading, the setback distances to all groundwater features as prescribed under the Livestock Manure and Mortalities Management Regulation should be considered as a minimum distance.</p>	ECC

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
11	Water Control Works	<p>ECC has no concerns at this time, as there appear to be no water control works proposed.</p> <p>Under <i>The Water Rights Act</i>, a valid Water Rights Licence or Registration Certificate is required to control water or construct, establish or maintain any water control works. Water control works are defined as any dike, surface or subsurface drain, drainage, improved natural waterway, canal, tunnel, bridge, culvert, borehole or contrivance for carrying or conducting water, that temporarily or permanently alters, or may, alter the flow or level of water, water in a water body, by any means, including drainage or changes, or may change the location or direction of flow of water by any means including drainage.</p> <p>For additional information, or to apply for authorization online, please follow the link below: Environment, Climate and Parks Province of Manitoba (gov.mb.ca)</p>	ECC
12	Manure Type and Storage: Existing solid manure storage facility	<p>The applicant will use an existing manure storage that is registered or was constructed under permit. Under the Livestock Manure and Mortalities Management Regulation, the applicant must:</p> <ul style="list-style-type: none"> • Ensure there is sufficient capacity to store all manure through the winter. • Maintain the structural integrity of the storage. • Operate the storage so that it does not pollute surface water, ground water or soil. 	ECC
13	Mortalities disposal methods identified: Composting	<p>The applicant will compost mortalities. Under the Livestock Manure and Mortalities Management Regulation, the applicant must:</p> <ul style="list-style-type: none"> • Ensure the composting does not pollute surface water, groundwater, or soil. • Locate the composting site at least 100 m from any surface watercourse, well, or the operation's boundaries. • Ensure the composting facilities and process are acceptable to the director. 	ECC
14	Setback Distances from Manure, Livestock, and Mortalities to Water and Operation Boundaries	<p>It is noted that a setback variance was obtained when the existing manure storage facility was constructed, and no further construction is proposed for this project.</p>	ECC
15	Building in Designated Flood Areas	<p>The site of the proposed livestock operation is not within a Designated Flood Area. While the site is adjacent to Seine River Diversion, which is provincial water infrastructure, the proposal does not appear to impact the diversion.</p>	MTI
16	Odour control measures (project site)	<p>Manova (2012) Ltd. has indicated that the layer chicken manure will be stored in a building and that shelterbelts will be used.</p> <p>Should odour become a problem for neighbouring residents, there is a complaints process under <i>The Farm Practices Protection Act</i>. A person who is disturbed by any odour, noise, dust, smoke or other disturbance resulting from an agricultural operation may make a complaint, in writing, to the Manitoba Farm Industry Board.</p> <p>The Act is intended to provide for a quicker, less expensive and more effective way than lawsuits to resolve nuisance complaints about farm practices. It may create an understanding of the nature and circumstances of an agricultural operation, as well as bring about changes to the mutual benefit of all concerned, without the confrontation and the expense of the courts.</p>	AGR

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
		<p>The applicant indicates that manure will be stored in a building (covered) and that there is an existing shelterbelt.</p> <p>As per section 116(2) of <i>The Planning Act</i>, Council may impose any relevant and reasonable conditions of approval required to reduce odours from the operation, including by requiring covers on manure storage facilities or that shelterbelts be established.</p>	MNR
17	Land Available for Manure Application	The estimated land requirement for Manova (2012) Ltd. is 848 acres for the phosphorus excreted by the livestock or 453 acres for the nitrogen, whichever is higher. Manova (2012) Ltd. has satisfied the land requirement by demonstrating that they have access to 1022 suitable acres. Additional details can be found in Appendix A.	AGR
		All proposed spread fields in both the RM of Ste. Anne and the RM of Taché are appropriately designated and zoned for agricultural activities.	MNR
18	Setbacks for Manure Application	Under the Livestock Manure and Mortalities Management Regulation, manure spreading must meet setback distances from all surface watercourse and groundwater features.	ECC
19	Manure Transportation and Application	<p>Please be advised that any structures placed within the controlled area of PTH 12 and PR 311 (125 feet from the edge of the right-of-way) requires a permit from our office. For permit information, please contact Juanita Mowbray at 204-583-2433 or by email at Juanita.Mowbray@gov.mb.ca. Permit information can also be found at https://forms.gov.mb.ca/highway-permits-application/index.html.</p> <p>The placements of temporary drag lines or any other temporary machinery/ equipment for manure application within the right-of-way of PTH 12 or any PR 311 requires permission from Manitoba Transportation and Infrastructure's Steinbach Office. Please contact the Regional Planning Technologist, Robert Fender, at (204) 346-6266 or Robert.Fender@gov.mb.ca. In addition, please notify the Regional Planning Technologist for the placement of temporary draglines or other temporary equipment for manure application within the controlled area of PTH 12 or PR 311 (125 feet from the edge of the right-of-way).</p>	MTI
		<p>Under the Livestock Manure and Mortalities Management Regulation, the applicant must:</p> <ul style="list-style-type: none"> • Operate with an annual manure management plan which includes: <ul style="list-style-type: none"> ○ Manure type, volume, and nutrient values ○ Spread field location and soil class ○ Soil tests showing nitrogen and phosphorus levels ○ Crops to be grown 	ECC
20	Manure Application on Lands Subject to Frequent Flooding or Inundation	The applicant has indicated that some spread fields are located within a regularly inundated area. Under the Livestock Manure and Mortalities Management Regulation, manure applied there between September 10 and November 10 must be injected or incorporated within 48 hours. This does not apply where perennial forages are established, or the soil is not disturbed except for seed planting or commercial fertilizer application and has adequate crop residue to control erosion	ECC
21	Projected Truck Haul Routes and Access Points	The proposed truck haul route utilizes existing municipal roads connecting onto PTH 12 and PR 311. MTI doesn't anticipate any significant increase in use.	MTI
		<p>The proposed site is accessed by municipal road (Two Mile Road).</p> <p>As per Section 116(2) of <i>The Planning Act</i>, municipalities, as a condition of approval, may require the proponent to enter into a development agreement regarding the condition and upkeep of local roads used as truck haul routes.</p>	MNR

Related Section in the Site Assessment	Related Provincial Requirements and Safeguards	Dept.
<p>22</p> <p>Conservation Data Centre Report</p>	<p>The information provided in the assessment suggest that there will not be any conflicts with species protected under <i>The Endangered Species and Ecosystems Act</i> and/or <i>The Species at Risk Act</i> or designated as rare or uncommon by the Manitoba Conservation Data Centre (MBCDC).</p> <p>EDITNR's review is based on existing data known to the MBCDC of the Wildlife Branch at the time of the review. These data are dependent on the research and observations of our scientists and reflects our current state of knowledge. An absence of data does not confirm the absence of any rare or endangered species. Many areas of the province have never been thoroughly surveyed, however, and the absence of data in any particular geographic area does not necessarily mean that species or ecological communities of concern are not present. The information should, therefore, not be regarded as a final statement on the occurrence of any species of concern. All future observations of rare or endangered species made by the proponent should be reported to the MBCDC for further review.</p>	<p>EDITNR</p>

Provincial Departments: Agriculture (AGR); Environment and Climate Change (ECC); Transportation and Infrastructure (MTI); Municipal and Northern Relations (MNR); Economic Development, Investment, Trade and Natural Resources (EDITNR)

D. PUBLIC COMMENTS AND DISPOSITIONS

Public Comment Summary	
Bernie Brandt – Tiny Creek Farms Mark Reimer – Reimark Farms ½ mile from operation	Support the expansion as they: <ul style="list-style-type: none">• Signed over spreading rights to applicant and have benefitted by doing so.• Believe operation is well run and respectful of provincial rules and regulations.
Les Schewe 2 miles south of operation	Comments: <ul style="list-style-type: none">• Recommends that applicant work with Seine Rat Roseau River District to identify and implement environmentally beneficial projects and practices. Concerns: <ul style="list-style-type: none">• Uncertain whether applicant has complied with provincial requirements and regulations as part of application.

A full copy of the public comments as well as the proponent's response may be viewed on the public registry at: https://www.gov.mb.ca/mr/livestock/public_registries.html

See Appendix B for the proponent's response to the public comments.

E. CONCLUSIONS AND RECOMMENDATIONS

Conclusion

The information contained in the Site Assessment submitted by the proponent generally meets provincial requirements. In addition, based on available information it has been determined that the proposed operation will not create a risk to health, safety or the environment, or that any risk can be minimized through the use of appropriate practices, measures and safeguards.

Actions to Council

1. As per Section 114(2) of *The Planning Act*, at least 14 days before the date of the hearing, Council must:
 - a) send notice of the hearing to
 - i. the applicant,
 - ii. the Minister (c/o the Steinbach Community Planning Office),
 - iii. all adjacent planning districts and municipalities, and
 - iv. every owner of property located within three kilometres of the site of the proposed livestock operation, even if the property is located outside the boundaries of the planning district or municipality; and
 - b) publish the notice of hearing in one issue of a newspaper with a general circulation in the planning district or municipality or, when there is no newspaper with a general circulation in the area, post the notice in the office of the planning district or municipality and at least two other public places in the district or municipality; and
 - c) post a copy of the notice of hearing on the affected property in accordance with the Posting Requirements outlined in Section 170 of *The Planning Act*.
2. Council should specify the type(s) of operation, legal land location, number of animals in each livestock category, total animal units, and expiration date (as per *Planning Act* section 110(1)) in its Conditional Use Order.
3. As per Section 117 of *The Planning Act*, Council must send a copy of its Conditional Use Order to
 - a) the applicant,
 - b) the Minister (c/o the Steinbach Community Planning Office), and
 - c) every person who made representation at the hearing.
4. According to the RM of Ste. Anne Zoning By-law No. 2023-13, the required minimum site area for a livestock operation is 80 acres in "A" Agriculture zone and the required minimum site width for a livestock operation is 1000 ft. The site area of the proposed operation is 65.39 acres in area and the site width of the proposed operation is 955 ft. As a result, Council will require the proponent to apply for a variance.
5. As per Section 169(4)(b) of *The Planning Act*, a copy of the notice of hearing to vary the separation distance involving a livestock operation must be sent to every owner of property located within the separation distance that is proposed to be varied.
6. As per Section 174(1) of *The Planning Act*, Council can hold all required hearings together in a single combined hearing. It is recommended that during the course of this public hearing, Council first deal with the conditional use order followed by the variance order.

7. As per Section 174(2) of *The Planning Act* the notice of hearing for each matter to be considered at a combined hearing may be combined into a single notice of hearing.
8. Councils are requested to include in their resolution and/or Conditional Use Order notification that, as per Section 118.2(1) of *The Planning Act*, an applicant may appeal the following decisions of a board or council to the Municipal Board:
 - b) for an application for approval of a conditional use made in respect of a large-scale livestock operation,
 - i. a decision to reject the application,
 - ii. a decision to impose conditions.
9. As per Section 118, no development or expansion of a livestock operation that is the subject of an application under Part 7, Division 2 of *The Planning Act* may take place until
 - a) the application is approved and the applicant complies, or agrees to comply, with any condition imposed on the approval under this Division; and
 - b) the applicant obtains every approval, including any permit or licence, required under an Act, regulation or by-law in respect of the proposed operation or expansion, and complies with, or agrees to comply with, any condition attached to the approval.
10. Council is welcome to contact Manitoba Environment and Climate Change, Environmental Approvals Branch or Regional Environmental Compliance and Enforcement staff with respect to the Livestock Manure and Mortalities Management Regulation (M.R. 42/98) including compliance and enforcement issues.

Actions to Proponent

1. That a variance be applied for prior to the Conditional Use Hearing to vary the required minimum site area of a livestock operation from 80 acres to 65.39 acres and the required minimum site width of a livestock operation from 1000 ft. to 955 ft. This will provide Council with the option of holding a combined Conditional Use and Variance Hearing.
2. That the proponent request that the Council hold a combined hearing.
3. That any additional measures identified through subsequent provincial licencing or permitting in order to minimize any identified risks to health, safety and the environment be undertaken.
4. That, as per Section 118.2(1)(b) of *The Planning Act*, an applicant may appeal the following decisions of a board or council to the Municipal Board:
 - b) for an application for approval of a conditional use made in respect of a large-scale livestock operation,
 - i. a decision to reject the application,
 - ii. a decision to impose conditions

F. TECHNICAL REVIEW COMMITTEE MEMBERS

Name	Department	Title Branch	Contact
Inonge Aliaga	Municipal and Northern Relations	Senior Planner <i>Community Planning Branch</i>	431-276-9741
Petra Loro	Agriculture	Livestock Environment Specialist <i>Land Use and Ecosystem Resilience Branch</i>	204-918-0325
Colin Murray	Economic Development, Investment, Trade and Natural Resources	Information Manager- Manitoba Conservation Data Centre <i>Fish and Wildlife Branch, Natural Resources and Northern Development</i>	204-914-2849
Julie Froese	Environment and Climate Change	Environmental Livestock Coordinator <i>Environmental Approvals Branch</i>	204-945-7104
Jeff DiNella	Transportation and Infrastructure	Senior Development Review Technologist <i>Highway Planning and Design Branch</i>	204-945-2664

Appendix A

Manitoba Agriculture – Sustainable Agriculture Branch

In areas of lower livestock intensity, such as the RMs of Ste. Anne and Tache, it is currently the Province of Manitoba's policy to require sufficient suitable land for all of the nitrogen and half of the phosphorus generated by the livestock. This policy assumes that more land is available in areas of lower livestock intensity to balance manure phosphorus with crop phosphorus removal, should it be necessary in the future.

Typical, modern feeding practices for layers were used to estimate nutrient excretion for Manova (2012) Ltd. Realistic, long-term 10-year crop yields from the Manitoba Agricultural Services Corporation (MASC) for the RMs of Ste Anne and Tache were used to estimate crop nitrogen uptake and phosphorus removal rates for the crop rotation specified in the proposal.

Land suitability is determined using soil testing for phosphorus and soil survey to establish the agriculture capability. Soils must be below 60 ppm Olsen P to be considered suitable. Semi-detailed soil survey is available in the area to determine the agriculture capability of the land. The soil survey indicates the land is predominantly Classes 2W and 3W. The most significant limitation in the area is wetness (W).

The estimated land requirement for Manova (2012) Ltd is 848 acres for the phosphorus excreted by the livestock or 453 acres for the nitrogen, whichever is higher. Manova (2012) Ltd has satisfied the land requirement by demonstrating that they have access to 1022 suitable acres.

Manitoba Economic Development, Investment, Trade and Natural Resources – Lands Branch

A review of the information provided suggests there is no impact to Crown land administered under The Crown Lands Act. This review is based on information known to the Lands and Planning Branch as documented in the Crown Lands Registry System.

Manitoba Environment and Climate Change – Water Science and Watershed Management Branch

Proper nutrient management applications that avoid excess loss of nutrients to surface waters are needed on lands receiving manure in southern Manitoba because long-term trend analysis of total phosphorus and total nitrogen has shown significant increases in these nutrients in the Assiniboine and Red rivers (Jones and Armstrong 2001).

The proponent is planning to apply manure in fall, broadcast and incorporated within 48 hours. Broadcast with incorporation will reduce the risk to surface water when compared to broadcast only application methods.

For most crops, manure contains an excess of phosphorus (P) compared to nitrogen (N) and as a result, application at N-based rates causes a buildup of soil P. Practices which reduce N losses from the manure improve the N:P ratio in the manure and help slow P buildup when manure is applied at N-based rates. Incorporation is a practice which reduces N loss when compared to broadcast only application method.

The proponent has acknowledged the setback areas for all water features have been observed and excluded from land base calculations. Setbacks should be clearly communicated to and observed by

those involved in manure application to minimize the risk of nutrients entering surface and groundwater.

Manitoba has included phosphorus (P) as a nutrient by which fertilizer application through manure, synthetic fertilizer, and municipal waste sludge to agricultural lands may be limited. Many agricultural soils in Manitoba, especially areas with low livestock intensity, are considered P deficient and therefore, manure is an ideal fertilizer to support crop production. However, manure application can increase soil P over time and other spread fields may need to be added to prevent excessive soil P build up. As excess P levels build up in soils, greater losses occur to surface and ground water. It should be noted that Olsen soil-test P levels of 60 ppm are well above P needs for most crops (over 20 ppm is usually considered agronomically very high). In areas of lower livestock intensity, such as the RMs of Ste. Anne and Tache, it is currently the Province of Manitoba's policy to require sufficient suitable land for all of the N and half of the P generated by the livestock. This policy assumes that more land is available in the region to balance manure P with crop P removal, should it be necessary in the future for long-term sustainability. To remain environmentally sustainable over a long-term planning horizon of 25 years or more the proponent acknowledges that 1695 acres may be required for the operation. The proponent has identified 1022 acres with suitable soil test results for manure application at this time. Application to meet crop N requirements is estimated to use 453 acres. Application at 2 times the crop removal of P is estimated to use 848 acres (1695 acres is estimated to achieve P balance [P removal equal to P application] with current crop choices and yield potential).

As P levels build up in soils, the concentration of P in runoff to surface waters increases. It is important to rotate manure application across all spread fields and whenever possible focus manure applications on fields with low Olsen-P soil test levels so as to maximize the benefits from the P in the manure and to prevent excessive P buildup when applying manure at rates above P balance (P removal by harvested crops).

During manure spreading, setback distances to all groundwater features as prescribed under the Livestock Manure and Mortalities Management Regulation should be considered as a minimum distance.

Appendix B

FROM THE DESK OF

MANOVA (2012) LTD.

Manitoba Livestock Technical Review Committee
Department of Municipal and Northern Relations
604-800 Portage Ave, Winnipeg MB, R3G 0N4

Re: Public Response - Manova (2012) LTD. Layer Barn Expansion TRC-12-106

August 19, 2024

I want to express our profound gratitude for the public comments made regarding TRC-12-106. Your input is not just valuable, but integral to our continuous growth and improvement. Agriculture is the backbone of the Manitoban Economy, and your support, as local residents, is a cornerstone of our operations.

Regarding the questions brought forward, I appreciate the dedication to our environment, as it is vital to preserve our land and water base. I hope my kids can take over, and we can continue to farm in a better land than we inherited.

Manova is fortunate to have great relationships with local farmers to farm our owned land and haul and spread the manure produced. We take pride in ensuring our contractors make best use of manure by consulting with agronomists by getting yearly soil samples. As well as having experienced operators in applying manure to field. Each field is tilled in within 24hrs to ensure no extra run-off is occurring. All manure is dry with less than 15% moisture (manure dryers use) and is stored inside a sealed building with concrete floor and grade beams to ensure no seepage. With questions brought forward, we work with these scenarios constantly with all our locations and want to ensure that the environment is at the forefront of those discussions.

Sincerely yours,



Harley Siemens
President

