

March 30, 2020

Technical Review Co-ordination Unit
Municipal Relations,
Room 604 - 800 Portage Avenue,
Winnipeg, MB, R3G 0N4

Attn: Don Malinowski, TRC Coordinator

Re: File Nos. TRC -12-055 (Shiraz Nursery)

HyLife would like to acknowledge the concerns raised by residents regarding our proposed Shiraz Nursery pork production operation on NW-10-06-14W in the Municipality of Argyle. We respect their views and thank them for their time to comment in the Technical Review Committee's (TRC) public review process. In acknowledgement of the potential for public concerns related to this and other proposed developments in the municipality of Argyle, HyLife hosted an open house to inform the public of our proposed growth in the area. We felt it important to reach out to the general public prior to making any formal application to the Province to better understand the concerns of local residents.

HyLife - Our Company and our Proposed Shiraz Nursery Project

Our company's Manitoba roots date back to some 25 years when two farm families, Janzen and Vielfaure joined together to form what is now HyLife. Today, we are a vertically integrated pork producer that is headquartered in La Broquerie, Manitoba. The majority of our farm and associated operations are located in rural Manitoba.

We manage our integrated operations from "Farms to Foods" within 2 divisions. Our HyLife Farms operations oversee the raising of hogs, including genetics and production, manufacturing and supply of feed, transportation, manure nutrient management and support services. Our HyLife Foods operation oversees the manufacturing, marketing and distribution of quality pork products to both domestic and international markets.

Government Regulations, Monitoring & Enforcement

In Manitoba, a livestock producer must meet stringent development requirements and undergo a rigorous and complex development review and approval process. This process includes a mandatory provincial government technical review, public reviews, a formal public hearing and various provincial and local council approvals.



In particular, the livestock operation proposal must meet the requirements of The Planning Act, The Groundwater Protection Act, The Environment Act, (Livestock Manure and Mortalities Management Regulation) and The Water Protection Act (Nutrient Management Regulation) as well as other Provincial Acts and regulatory requirements depending on the nature and location of the proposed project.

Strict government requirements based on good science, good land use planning, professional engineering design and construction, and on-going government monitoring and enforcement protects our natural resources, the environment and the public interest.

Rural Area and Agricultural Zoning

The proposed 80-acre site is located in an area that is designated as "AGRICULTURAL GENERAL" in The 23 West Planning District Zoning By-Law No. 19 adopted in 2015. This By-law received extensive community review and was approved by local Municipal Council and the Province of Manitoba as the overall land use planning and development guiding document for the Argyle Community.

Zoning By-Law No. 19 states:

The "AG" Agricultural General Zone is hereby established in this Zoning By-law and is intended to:

- *Support and strengthen the agricultural industry in the 23 West Planning District and to provide flexibility and opportunity for farm operators to engage in a variety of agricultural uses and farming practices; and*
- *Protect the agricultural industry and its land resources in recognition of agriculture's contribution to the economy, lifestyle and character of the 23 West Planning District.*
- *Provide opportunities under the Conditional Use process to diversify land uses within the agricultural area to include agri-related commercial or industrial enterprises.*

HyLife has carefully chosen the proposed site as it is located in the "Agricultural General Zone" and is characterized by open agricultural land and is in line with the intent set out in the Zoning By-Law. This farmland would receive manure nutrient fertilizer from the proposed operation to sustainably grow crops. Our pork production operation bio-security requirements coupled with the practical requirement for a sustainable land base to spread manure nutrients ensures the appropriate distribution of livestock operations within agricultural areas.

Local zoning and provincial regulations require minimum separation distances for the facility from property boundaries, single residences, designated land uses, wells and watercourses and designated crown lands. The proposal meets every zoning requirement and in many circumstances, exceeds the minimum separation distance requirements of both the barn and manure storage facilities. This proposal exceeds the minimum setback distance from residences.



Odour Control

At HyLife, we utilize a multi pronged approach to assist in minimizing odour and potential impacts on area neighbours. The initial step is carefully selecting appropriate sites in the agricultural area that will meet or exceed all local and Provincial setback distance requirements.

HyLife employs considerable focus on the in-barn environment to maintain cleanliness and hygiene with efficient barn design and current technology to maintain a comfortable barn temperature and airflow. The barn design employed at this facility will be a deep pit design that eliminates the use of an earthen manure storage at the site and utilizes concrete storages beneath the animals for storing manure. These design considerations help to keep the in-barn production of odour to a minimum, creates a positive living and working environment for our livestock and staff, and as mentioned, eliminates the requirement of having an earthen manure storage facility on-site.

Outside, we will utilize a 3 row multi-species vegetated shelterbelt around the production facility. This will not only improve the aesthetic appearance of the site, but will create greater lift to better dissipate and diffuse odours.

With respect to manure nutrient application, our plan is to apply manure in the spring before seeding and in the fall, post harvest. Manure nutrient application will be done on an anticipated 2-3-year rotational basis. Manure nutrients will be applied in accordance with all applicable environmental regulations and utilize industry leading technologies. Application will also employ equipment designed to incorporate manure during the application process increasing liquid absorption and reducing odour.

Our manure management plans are prepared by certified manure management planners and licensed manure applicators. Application equipment is equipped with GPS technology and manure nutrients are applied at agronomic rates in accordance with all regulations. Manure management activities are governed and enforced by Manitoba Conservation and Climate.

Collectively, these in-barn and outside environmental measures and manure management practices will reduce odour from our proposed operation. Neighbours can be assured that HyLife will make best efforts to address all reasonable concerns brought to its attention. We value our reputation as a good corporate citizen in the communities in which we operate.

Water Quality - Protection of Surface Water and Groundwater

The proposed development is located within the Souris River/Whitewater Lake sub-watershed of the Assiniboine River Watershed. It is located outside of the provincially designated Red River Special Management Area that requires special flood risk mitigation measures to protect from flooding and ground and surface water pollution.



As in all cases, provincial regulations regulate all activities that have the potential to contaminate both surface and groundwater supply. Besides livestock operations, this includes urban development of cities, municipal (earthen) sewage lagoons and other treatment systems, gas stations, refuse disposal sites, many types of heavy industry, rural residential subdivisions and individual residential septic fields.

Surface and groundwater protection is provided by means of multi-layered regulations and monitoring and enforcement system. This includes location, design and construction of Professionally Engineered manure storage facilities, certification of manure applicators, strict annual soil testing, and regulating the methods and rate of fertilizer application. Provincial regulation strictly prohibits the application of manure near wells, surface watercourses or over potential aquifer recharge areas (gravel deposits, bedrock outcrops, sinkholes, etc.) The proposed development meets or exceeds all required setbacks from surface watercourses.

Manure Storage Safety

A deep pit manure storage facility has been proposed to contain manure from this operation. Such storage is a common and accepted method for storing liquid manure throughout the livestock industry.

Deep pit manure storages have been regulated by the Province of Manitoba since 1995. A permit to construct a concrete manure storage requires a detailed geotechnical assessment of soils; a design prepared by a professional engineer; review of the design and all relevant information by Manitoba Conservation and Climate prior to issuing the permit; site supervision of the construction by the responsible engineer and finally certification of the storage by the engineer when the work is completed. This process is required for all manure storages constructed in Manitoba.

Since the legislation was enacted in 1995 numerous hog, poultry and dairy storages have been constructed in the Province of Manitoba. This program is among the strongest legislation in North America and has an excellent record of providing safe containment of livestock manure.

As previously mentioned, setbacks are required from surface watercourses and the proposed concrete manure storage meets all setback requirements.

The design and construction standards enforced by the Province of Manitoba ensure that manure storages are designed, constructed and maintained to protect surface and groundwater resources. The Province conducts inspections and audits of manure storages during and after construction to ensure the structural integrity is being maintained. Any storages found to have experienced damage or deterioration are required to implement repairs, managed by professional engineers, to ensure the repairs and changes are done utilizing accepted engineering principles and practices.



Land Base Required to Recycle Crop Nutrients

Nutrients contained in the manure will be utilized as organic fertilizer for crop production. The organic material contained in the manure acts as a soil amendment by improving soil tilth, fertility, and water retention. Over time, increased soil organic matter content also builds a better and more stable soil structure less prone to erosion.

The manure will be applied as a fertilizer at agronomically accepted rates that will meet crop nutrient requirements. An annual manure management plan must be filed with Manitoba Sustainable Development prior to application of manure to fields. HyLife conducts soil testing to determine crop nutrient requirements and monitor soil nutrient residual values to ensure they are maintained within regulatory limits. The manure application rate is calculated using reasonable target yields, crop nutrient uptake, residual soil nutrient values and manure nutrient levels. Soil and manure nutrient contents are analysed annually.

As the manure management plans are filed with the Province annually, should a build-up of nutrients begin to occur, the Province would be alerted and require changes in the operation's manure management practices.

The land base required to sustainably support this proposed hog operation has been identified in the assessment filed with the Provincial Technical Review Committee (TRC). In fact, the manure agreements that have been signed with area producers exceed the required spread acres.

Area farmers have long realized that the manure nutrients are a valuable resource and provides a long term, sustainable crop fertilizer product. Demand for manure nutrients has increased exponentially over the past number of years as it is considered a valuable and sometimes preferred alternative for crop fertilization.

Water Consumption & Sustainable Water Supply

A new well will be developed for the Shiraz Nursery operation.

Prior to the development of a water supply that exceeds 5,500 gallons per day, a Water Rights License must be obtained through Manitoba Conservation and Climate. The license process includes the assessment of the proposed use on the aquifer and other uses. Manitoba Conservation and Climate establishes withdrawal rates that ensure existing users water supply will not be impacted by the new development. The local aquifer is expected to sustain all current uses as well as the proposed development without any concern. The water source for this facility will not be drawn from the fully allocated Assiniboine Delta Aquifer and an alternate groundwater source will be utilized to support this operation.

All developments requiring a Water Rights License must comply with the annual groundwater withdrawal limit set by Manitoba Conservation and Climate's Water Licensing Branch.

Traffic

There will be additional traffic daily to the proposed development with the addition of 4 new staff for the proposed Shiraz Nursery operation. There will also be an addition of 3-4 feed trucks and 6-8 livestock trucks per week. Truck schedules are sequenced to ensure efficient traffic movement to avoid congestion within and outside of our operations.

Traffic will use PR 5 which is provincial highway maintained and under the jurisdiction of Manitoba Infrastructure as well as municipal road 32N for 1 mile. Impact on municipal road infrastructure will be limited to this municipal road for the majority of the farm traffic.

Quality of Life and Property Values

We respect that existing rural-non-farm residents have chosen to reside in a designated Agricultural General area where Agriculture and livestock developments are existing or could be expected to develop in the future. As such, farm activity including crop and livestock production, fertilizer application, farm traffic, noise and farm related odours are to be expected in an agricultural area.

We believe that with mutual understanding and respect, we can both co-exist within the area and be good neighbours.

HyLife has and will continue to be a community partner in rural Manitoba and a contributor to growth and prosperity in a sustainable manner. HyLife is confident that this development is representative of these attributes and our commitment to the sustainable, positive growth within the community.

HyLife, once again would like to thank all individuals who provided comments and appreciate the opportunity to provide a response. We respect the views and opinions of all individuals and hope we have sufficiently addressed the questions and concerns that were brought forward.

Regards,



Sheldon Stott, Senior Director of Corporate Sustainability
HyLife Ltd.