



TECHNICAL REVIEW COMMITTEE

**A TECHNICAL REVIEW REPORT
PREPARED FOR**

**THE MUNICIPALITY
OF CARTWRIGHT-ROBLIN**

HYLIFE – CROWN ROYAL NURSERY

NW 1/4 30-2-15 WPM

TRC 12-080

March 19, 2021

A. INTRODUCTION – THE TEAM

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

Agriculture and Resource Development (ARD)

- Aggregate Resource Planner
- Agricultural Engineer
- Business Development Specialist
- Crown Lands Manager
- Fish Habitat Specialist
- Groundwater Specialist
- Habitat Mitigation and Wildlife Land Specialist
- Land-Water Specialist
- Livestock Environment Specialist
- Nutrient Management Specialist
- Veterinarians

Conservation and Climate (CC)

- Environmental Engineer
- Environment Officer
- Water Rights Licensing Technologist

Infrastructure (MI)

- Senior Development Review Technologist
- Senior Flood Protection Planning Officer

Municipal Relations (MR)

- Community Planners

And any other specialist or department that may have an interest, which may be consulted during the process.

THE TECHNICAL REVIEW COMMITTEE (TRC) REPORT

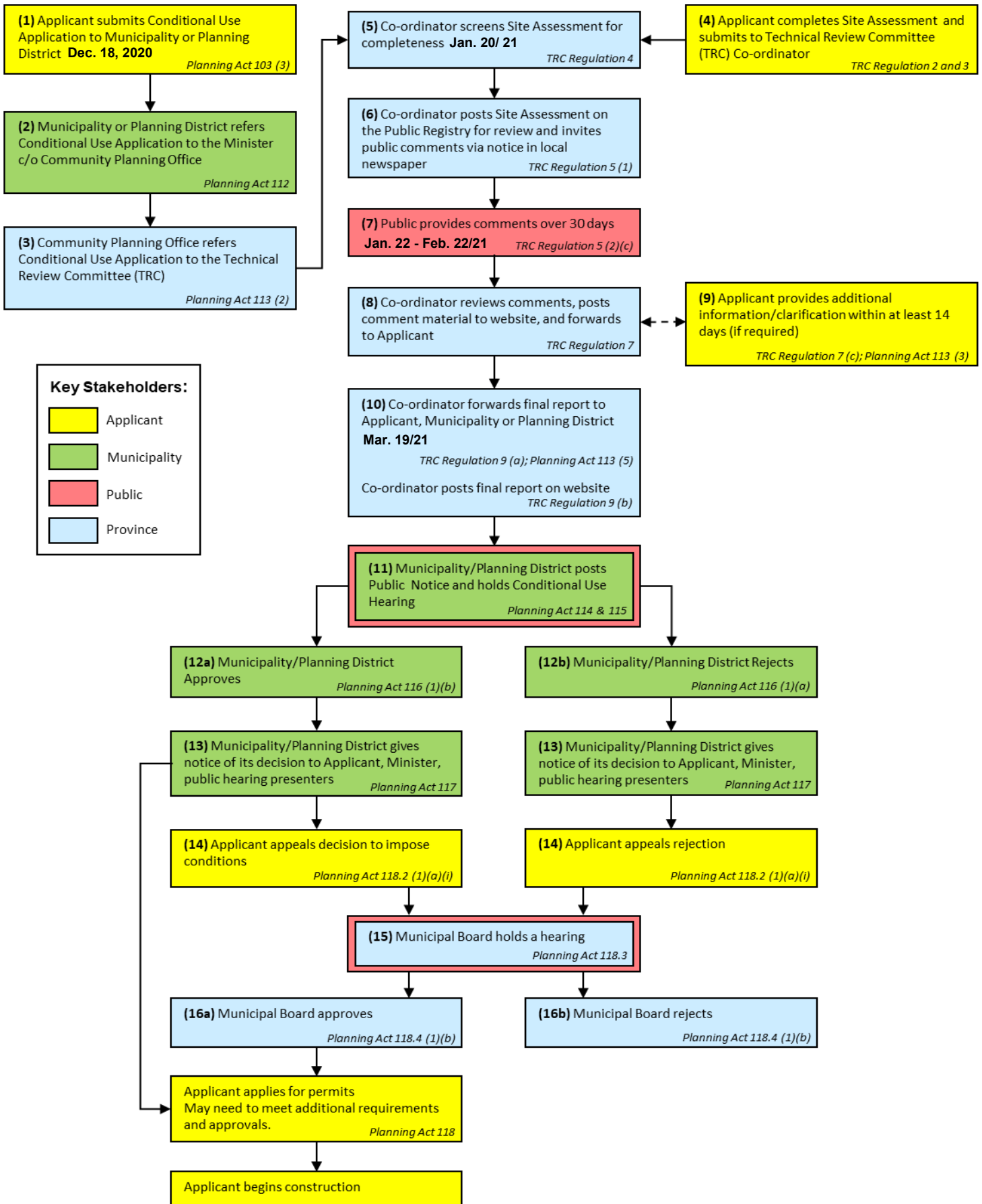
Purpose of TRC Reports

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

- a) Enable municipal councils or planning districts to make informed Conditional Use Permit decisions;
- b) Create a common stakeholder understanding of a livestock proposal, 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 municipal councils, planning districts and proponents; and
- e) Represents 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 the municipal council provide conditional approval of the 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 municipal council's rejection of their application or appeal a condition imposed related to municipal council's approval. Appeals are made to the Municipal Board.

Livestock Technical Review Process (November 1, 2019)



B. DESCRIPTION OF PROPOSED LIVESTOCK OPERATION

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

Applicant: Hylife Ltd.

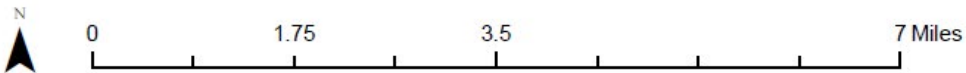
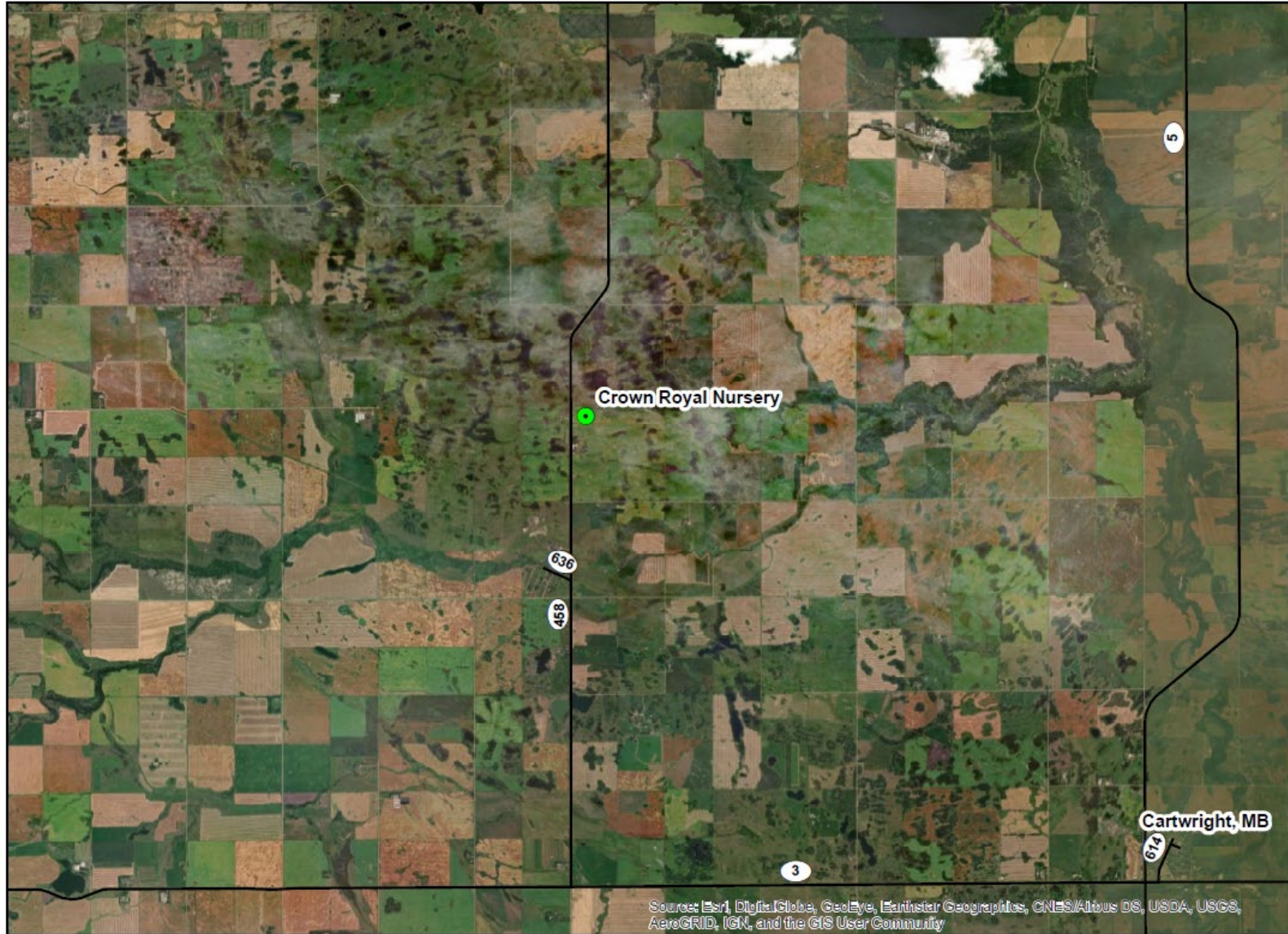
Site Location: NW ¼ 30-2-15 WPM. Refer to map below.

Proposal: To establish an 18,000 weanlings, nursery operation (594 Animal Units).

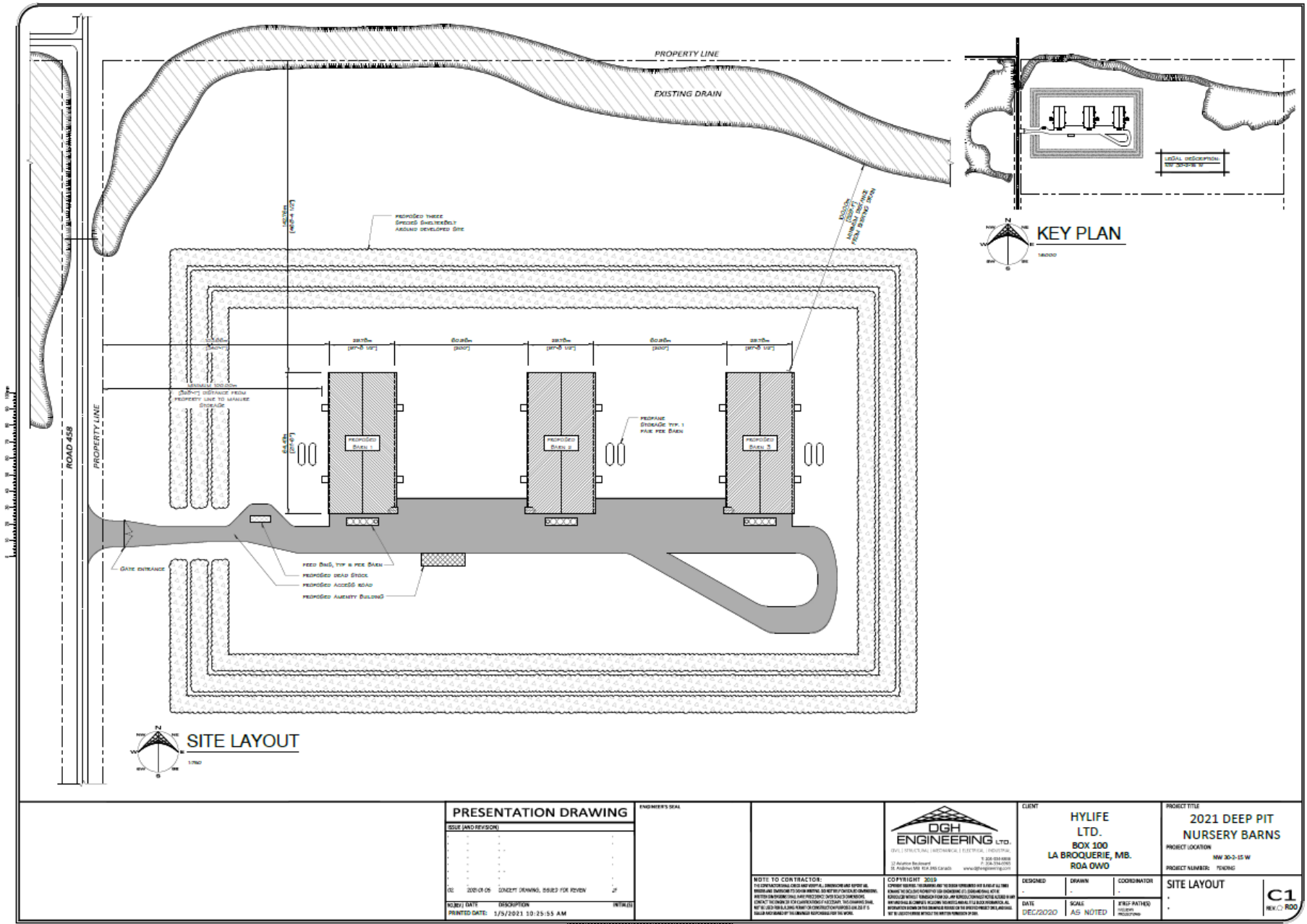
This will involve the following:

- Construction of three barns
- Under-barn concrete manure storage facility
- Consuming a maximum of 19,800 imperial gallons of water per day from a proposed well
- Rendering mortalities
- Truck haul routes as shown in map below

RM of Cartwright-Roblin - Proposed Nursery Site



Prepared by:
Kieran Hamm
Nutrient Management Coordinator
HyLife Ltd.



PRESENTATION DRAWING			
ISSUE (AND REVISION)			
NO.	DATE	DESCRIPTION	INITIALS
01	2020/01/05	CONCEPT DRAWING, ISSUED FOR REVIEW	JP
PRINTED DATE: 1/9/2021 10:25:55 AM			

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CLIENT
HYLIFE LTD.
 BOX 100
 LA BROUQUERIE, MB.
 ROA OWO

PROJECT TITLE
2021 DEEP PIT NURSERY BARNS
 PROJECT LOCATION
 HW 30-2-15 W
 PROJECT NUMBER: F21020

NOTE TO CONTRACTOR:
 THIS DRAWING IS A PRELIMINARY DESIGN. THE CONTRACTOR SHALL VERIFY ALL DIMENSIONS AND CONDITIONS ON SITE BEFORE COMMENCING WORK. ANY CHANGES TO THIS DRAWING SHALL BE MADE BY THE ARCHITECT. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS.

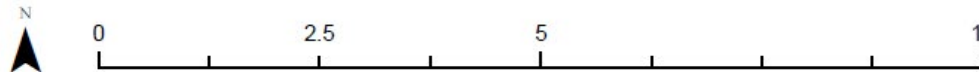
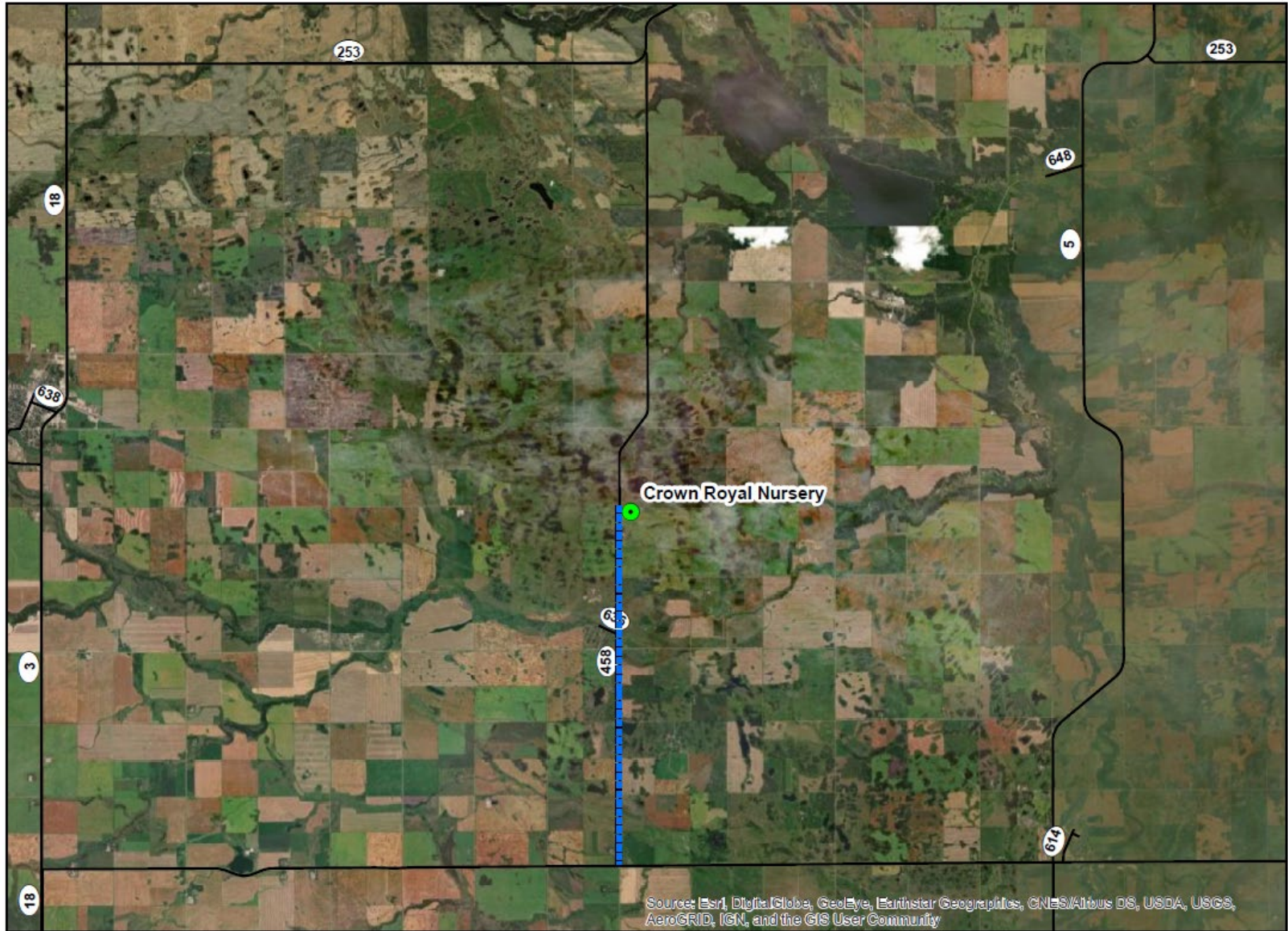
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DESIGNED	DRAWN	COORDINATOR
-	-	-
DATE	SCALE	PROJECT NUMBER
DEC/2020	AS NOTED	F21020

SITE LAYOUT

C1
 REV. C1 ROD

Proposed Crown Royal Nursery - Truck Haul Route



Prepared by:
Kieran Hamm
Nutrient Management Coordinator
HyLife Ltd.

C. SITE ASSESSMENT OVERVIEW

Provincial Technical Overview of TRC 12-080 – Hylife Crown Royal Nursery				
Item No.	Provincial Requirements	Confirmed	Related Provincial Safeguards	Dept.
1	Submitted complete site assessment	X	Technical Review Committee Regulation 119/2011 requires an applicant to submit a completed site assessment.	MR
2	Clearly identified the current and proposed type and number of animals and animal units	X	HyLife Crown Royal is currently seeking Conditional Use approval to build an 18,000 head nursery operation. This is equivalent to 594 animal units (AU).	ARD ¹
3	Project clearly defined as:	X	The project is clearly defined as an animal confinement facility.	CC
	<u>594 AU animal confinement facility / confined livestock area</u>	X	Each of the three (3) proposed barns will house 6,000 head (weanlings/nursery) = 198 AU per barn for a total of 18,000 head = 594 AU. The proponent intends to construct a (3) row shelterbelt around the perimeter of all three barns. Manure will be stored in deep under barn pits.	MR
4	Identified all existing and proposed buildings and structures and related separation distances	X	RM of Roblin Zoning By-law No. 301-04 – The NW-30-2-15WPM is zoned “AG” Agricultural General Zone. Livestock operations 300 AU or more in size in the “AG” zone require conditional use approval from Council. The proposed facilities meet minimum zoning by-law mutual siting and setback requirements between non-earthen manure storage facilities and animal housing facilities and the nearest unrelated single dwelling and designated area.	MR
5	Demonstrated project site is not located within Nutrient Management Zone N4 or any Nutrient Buffer Zone	X	The project site is not located within Nutrient Management Zone N4 or any Nutrient Buffer Zone.	ARD ²

¹ Agri-Resource Branch

² Water Science and Watershed Management Branch

Provincial Technical Overview of TRC 12-080 – Hylife Crown Royal Nursery

Item No.	Provincial Requirements	Confirmed	Related Provincial Safeguards	Dept.
6	Identified suitable water source: <u>proposed well</u> and a water consumption rate of <u>19,800</u> imperial gallons per day	X	This project proposal has noted an estimated water usage that will exceed 25,000 litres per day, therefore a Water Rights Licence will be required. The proponent has submitted an Application to Construct a Well and Divert Groundwater, and a Groundwater Exploration Permit has been issued for this project. They are currently in good standing with the Water Use Licensing Section.	CC
7	Proposed project site meets development plan, zoning by-law	X	<p><i>The Planning Act</i> requires that development plans must include a livestock operation policy that guides zoning by-laws dealing with livestock operations.</p> <p><i>The Planning Act</i> requires municipalities to issue development permits for any development on a site. All development must comply with the Zoning By-law and Development Plan. Any proposed development that does not meet the separation distances or setbacks requires Council approval and a public process to vary those requirements.</p> <p>Designation The proposed livestock operation, located in the NW 30-2-15WPM in the Municipality of Cartwright-Roblin, is designated GENERAL AGRICULTURAL AREA (Roblin-Cartwright Development Plan By-law No. 23/2002) and the proposal complies with Development Policies PPART 3, 3.3.2 (Livestock).</p> <p>Zoning The proposed site is zoned “AG” Agricultural General Zoning By-law No.301-04) and has a minimum site area requirement of 80 acres with a minimum site width requirement of 800 feet - (Proposal provides 1,000 ft of frontage).</p> <p>The proposed project complies with the RM of Roblin Zoning By-law No. No. 301-04.</p> <p>A validated <u>Development Permit / Building Permit</u> and <u>Conditional Use Order</u> must be obtained from the Dennis County Planning District prior to commencement of construction.</p>	MR

Provincial Technical Overview of TRC 12-080 – Hylife Crown Royal Nursery

Item No.	Provincial Requirements	Confirmed	Related Provincial Safeguards	Dept.
8	Identified any unsealed abandoned wells on the project site or spread fields	X	The provincial water well database indicates that there are wells present on the proposed site and within the proposed spread field locations. If any of these wells are in use then a minimum buffer as outlined in regulations must be maintained during spreading. These wells should be located and properly sealed if they are still present and not in use and a sealed well report must be filed with the Groundwater Management Section of Agriculture and Resource Development for each well sealed. Information on well sealing and well sealing reports are available from Agriculture and Resource Development (204-945-6959) or: https://gov.mb.ca/water/groundwater/wells_groundwater/index.html . 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.	ARD ³
9	Identified suitable manure storage methods	X	A permit to construct the proposed manure storage facility for each operation must be obtained, prior to initiating any of the construction work, in accordance with the Livestock Manure and Mortalities Management Regulation. An application for a permit to construct each manure storage facility must be submitted to Environmental Approval Branch of Conservation and Climate (EABDirector@gov.mb.ca). Design guidelines and application forms are available at: https://www.gov.mb.ca/sd/waste_management/livestock_program/index.html .	CC
10	Identified acceptable manure application methods	X	The proponent must submit and adhere to a manure management plan approved for the facility per the Livestock Manure and Mortalities Management Regulation (MR 42/98).	CC
11	Mortalities disposal methods identified (rendering)	X	The proponent has indicated that mortalities will be dealt with by rendering. This is an acceptable method under the LMMMR (MR 42/98). More specific information is included in the Livestock Manure and Mortalities Management Regulation and at: https://www.gov.mb.ca/sd/waste_management/livestock_program/index.html .	CC

³ Water Science and Watershed Management Branch

Provincial Technical Overview of TRC 12-080 – Hylife Crown Royal Nursery

Item No.	Provincial Requirements	Confirmed	Related Provincial Safeguards	Dept.
12	Proposed suitable setback distances from water and property lines for manure, livestock and mortalities	X	The proposal identifies that the water use for the livestock operation is from a proposed new well on the NW 30-2-15W. For a proposed new well, the Well Standards Regulation under The Groundwater and Water Well Act (https://web2.gov.mb.ca/laws/statutes/ccsm/g110e.php) should be consulted. The regulation requires a minimum 100-metre separation distance between a well and confined livestock areas or manure storage facilities.	ARD⁴
		X	The proponent indicates that setback distances meet minimum requirements set out in the Livestock Manure and Mortalities Management Regulation MR 42/98.	CC
13	Indicated if proposed project site is within designated flood area or is otherwise at risk of flooding	X	The project site is not within a Designated Flood Area. There is no known risk of flooding at this location.	MI
14	Proposed acceptable odour control measures	X	The proponent has indicated that a shelterbelt will be established. Manure will be stored in deep, under-barn pits. There is no plan for an outdoor storage. This may result in reduced odours from the manure while in storage but, due to reduced storage capacity, the manure will have to be pumped out and land applied twice a year rather than once. Should odour become a problem for neighbouring residents, there is a complaints process under The Farm Practices Protection Act. 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. 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.	ARD⁵
		X	The proponent intends to construct a (3) row shelterbelt around the perimeter of all four barns. Manure will be stored in deep under barn pits.	MR

⁴ Water Science and Watershed Management Branch

⁵ Agri-Resource Branch

Provincial Technical Overview of TRC 12-080 – Hylife Crown Royal Nursery

Item No.	Provincial Requirements	Confirmed	Related Provincial Safeguards	Dept.
15	Proposed sufficient and suitable land for manure spreading with minimum setbacks from water sources	X	The required land base for Crown Royal is 979 acres. Crown Royal has exceeded the land requirement by demonstrating that they have access to 1,429 suitable acres. Additional information is provided in Appendix A.	ARD⁶
		X	During manure spreading, setback distances to all groundwater and surface water features as prescribed under the Livestock Manure and Mortalities Management Regulation should be considered as a minimum distance.	CC
16	Indicated if spread fields are located in the Red River Valley Special Management Area or any other regularly inundated area	X	This project is not located in the Red River Valley Special Management Area or any other regularly inundated area.	CC
17	Proposed spread fields that meet development plan and zoning by-law requirements	X	<p>All lands proposed for spreading in Cartwright Roblin identified for manure spreading are designated AGRICULTURAL GENERAL AREA” and zoned “AG” Agricultural General Zone. The SE 25-2-16WPM (Located in Killarney-Turtle Mountain is zoned “AL” Agricultural Limited Zone (By-law No. 2-2016).</p> <p>Said land use designation and municipal zoning districts (above) allow spreading of manure associated with newly siting and/or expanding livestock operations.</p>	MR

⁶ Agri-Resource Branch

Provincial Technical Overview of TRC 12-080 – Hylife Crown Royal Nursery

Item No.	Provincial Requirements	Confirmed	Related Provincial Safeguards	Dept.
18	Proposed acceptable manure transportation methods	X	The transport of livestock manure is subject to Section 9 of the Livestock Manure and Mortalities Management Regulation. The proponent has indicated a dragline as means of manure transportation. This is considered acceptable under the Livestock Manure and Mortalities Management Regulation.	CC
			<p>There are no designated Provincial Waterways in the immediate vicinity.</p> <p>Please be advised that any structures placed within the controlled area of PR 458, and PTH 3 (125 feet from the edge of the right-of-way) requires a permit from our office. The contact is Sheena del Rosario at (204) 583-2433 or Sheena.Delrosario@gov.mb.ca. The placements of temporary drag lines or any other temporary machinery/equipment for manure application within the right-of-way of PR 458, and PTH 3 requires permission from our regional office in Brandon. Please contact the Regional Planning Technologist, Brian Hickman at (204) 726-6822 or Brian.Hickman@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 PR 458, and PTH 3 (125 feet from the edge of the right-of-way).</p>	MI
19	Identified suitable trucking routes and access points	X	The subject farm has frontage along PR 458 with an existing access. The proposed truck haul route will utilize PR 458 to PTH 3. We do not have any concerns.	MI
20	Identified proposed trucking routes – local roads	X	<p>The proposed site is accessed by a municipal road west from the site intersecting with PR 458 heading south and intersecting with P.T.H. No. 3. No alternate route is identified.</p> <p>As per Section 116(2) of <i>The Planning Act</i>, municipalities as a condition of approval may require proponent to enter into a development agreement regarding the condition and upkeep of local roads used as truck haul routes.</p>	MR

Provincial Technical Overview of TRC 12-080 – Hylife Crown Royal Nursery

Item No.	Provincial Requirements	Confirmed	Related Provincial Safeguards	Dept.
21	Known rare species will not be impacted on new site/lands	X	The in-formation provided in the assessment suggest that there will not be any conflicts with species protected under the <i>Endangered Species and Ecosystems Act</i> and/or <i>Species at Risk Act</i> , or designated as rare or uncommon by the Manitoba Conservation Data Centre (MBCDC). This review is based on existing data known to the MBCDC of the Wildlife and Fisheries 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.	ARD ⁷

Provincial Departments: Agriculture and Resource Development (ARD), Conservation and Climate (CC), Infrastructure (MI), Municipal Relations (MR)

⁷ Wildlife and Fisheries Branch

D. PUBLIC COMMENTS AND DISPOSITIONS

Public Comment Summary	
Cheryl and Bill Lawson Rock Lake, MB	OPPOSED Commenters are residents of Rock Lake and are concerned that property values in all directions will be negatively affected due to the pig operations direct impact on the land, rivers, lakes and air.
Brenna Lawson Rock Lake, MB	OPPOSED Commenter is a resident of Rock Lake and is concerned that property values in all directions will be negatively affected due to the pig operations direct impact on the land, rivers, lakes and air.
Riley Kemp Cartwright, MB	CONCERNED Commenter is concerned that concentrated operations such as the proposed Hylife barn only profits large corporations at the expense of rural communities. They feel that the promises of increased jobs by large corporations such as Hylife often never materialize and instead, the communities are left with consequences including losses in tourism, decrease in property values, environmental degradation and risks to local aquifers, lakes and rivers. They feel these effects reduces any real and innovative opportunities for growth in small communities.
Judy and Darwin Robertson Cartwright, MB	OPPOSED Commenters are opposed to the operation for the following reasons: <ol style="list-style-type: none"> 1. Young farmers have remained in the community, are enjoying family farming and contributing to rural life as a result of avoiding large commercial farming operations. These young farmers are focusing on sustainable and regenerative farming methods. 2. Raising pigs in an environment that has no similarity to their natural habitat is inhumane. 3. The regulations around manure management does not avoid highly offensive, irritating and potentially diseases producing gases from polluting the air. 4. Concerns about the impact of the operation's water use for neighbouring farms and communities. 5. Concerns about nutrient flow from spread fields into the drinking water supply and nearby creeks that flow into Rock Lake which already has a high nutrient load. 6. Whether the taxes paid by the corporation will be adequate to cover for maintaining the municipal road which will be significantly impacted by the pig barn's construction.
Kim Langen Holmfield, MB	CONCERNED Commenter's first concern is about the management of PR 458. They are concerned about the ability of the highway to support Hylife trucks that will use the road year round. They will like to know how Hylife, Highways and Infrastructure will address this. The second concern is whether any considerations have been made for residences within 3-km of the proposed operation including the historic community of Holmfield. Their third concern is whether there are any plans and cost to replace the historic Holmfield bridge, a bridge which is mentioned in the MB historical society archives, has endured floods and storms and heavy traffic for nearly 100 years.

<p>Janice Smith Killarney, MB</p>	<p>CONCERNED The commenter (the acting mayor of the municipality of Killarney-Turtle Mountain) is concerned about the proposed truck route for the operation.</p> <p>The proposed truck route lies on the divide road between the municipality of Cartwright-Roblin and the municipality of Killarney-Turtle Mountain and the commenter believes there needs to be some discussion about the use of specific truck routes for the operation, making the proposed truck route a condition of the conditional use order and for the municipalities involved to be duly compensated for the additional road maintenance.</p>
<p>Randy Dyck Holmfield, MB</p>	<p>OPPOSED Commenter feels the barn will increase air pollution and cause a blight on the landscape, making it difficult for people to live close to the proposed operation site.</p>
<p>Ariane Beaudoin Killarney, MB</p>	<p>OPPOSED Commenter feels this operation will sandwich them between two barns and their air will be polluted which ever direction the wind blows.</p> <p>Their second concern is about the already bad state of Neelin road and the heritage bridge in Holmfield which they feel would become worse as a result of increased traffic from the proposed operation.</p>
<p>Troy Stozek Cartwright - Roblin Municipality, MB</p>	<p>OPPOSED Commenter is a resident of the municipality and believes that the operation will result in excessive and unsustainable nutrient loading on the surrounding landscape and watershed, air pollution to neighbouring farms and communities, massive water consumption to service the hogs and damage to municipal roads due to increased truck traffic.</p> <p>They are also concerned about the proximity of the operation to the community of Holmfield, protected Crown lands and Long River watershed.</p>
<p>Pearl Black Cartwright – Roblin Municipality, MB</p>	<p>OPPOSED Commenter is concerned that the proposed operation would compromise the water quality.</p> <p>Their second concern is about air pollution form the manure and the potential of nutrients leaking into the lakes.</p> <p>They are also concerned about a drop in property values when the pig barns are constructed.</p>
<p>Murray and Tricia Livingstone Cartwright - Roblin Municipality, MB</p>	<p>OPPOSED Commenters are concerned that any tax dollars gained from the operation would be spent on road maintenance around the facility.</p> <p>They are also concerned about the depletion and possible contamination of water sources despite promises of safeguarding environmental conditions.</p>

<p>Cory E. Laughlin Cartwright, MB</p>	<p>OPPOSED Commenters are opposed to the operation for the following reasons:</p> <ol style="list-style-type: none"> 1. Young farmers have remained in the community, are enjoying family farming and contributing to rural life as a result of avoiding large commercial farming operations. These young farmers are focusing on sustainable and regenerative farming methods, improving the quality of land, quality of food produced and yield. 2. The site assessment does not adequately assess animal welfare points described in CCAC guidelines on the care and use of animals in research, teaching and testing. 3. The regulations around manure management does not avoid highly offensive, irritating and potentially diseases producing gases from polluting the air and affecting water courses and lakes 4. Concerns about the impact of the operation's water use for neighbouring farms and communities. 5. Concerns about nutrient flow from spread fields into the drinking water supply and nearby creeks that flow into Rock Lake which already has a high nutrient load. 6. There is no cost/benefit estimates to the municipality.
<p>Christine Livingstone Cartwright, MB</p>	<p>OPPOSED Commenter's first concern is about the possibility of contamination of the Long River which is south of the proposed operation, as well as the proximity of Ducks Unlimited and MWF Habitat lands to the operation.</p> <p>Their second concern is about the potential air pollution from the operation to adjoining lands and homes.</p> <p>Their third concern is about the impacts the proposed operation will have on PR 458 which they feel would become worse with the increased truck traffic.</p>
<p>Kelly and Mary Livingstone Cartwright, MB</p>	<p>OPPOSED Commenters' first concern is about the possibility of contamination of the Long River and a creek which are within a mile from the proposed operation, as well as the proximity of Ducks Unlimited and MWF Habitat lands to the operation.</p> <p>They feel that PR 458 will deteriorate further and negatively affect residents of the area if used as a truck route.</p> <p>Their third concern is about odour from the operation and reduced air quality which they feel will impact their social life and reduce residential property values in the area.</p>
<p>Rena Maxwell Cartwright, MB</p>	<p>OPPOSED The commenter is feels that the income from the taxes of the operation will not cover road maintenance expenses.</p> <p>They are also concerned about the possible nutrient contamination of Rock Lake.</p>
<p>Greg Carpenter Holmfield, MB</p>	<p>CONCERNED Commenter is concerned about reduced air quality and quality of life for residents in Holmfield and nearby communities due to the proposed operation.</p> <p>Their second concern is about the negative impacts of the proposed operation on PR 458 and the 100 year old bridge at Holmfield.</p>

<p>Jane Mckay-Nesbitt and John Nesbitt Cartwright, MB</p>	<p>OPPOSED Commenters are opposed to the operation for the following reasons:</p> <ol style="list-style-type: none"> 1. Young farmers have remained in the community, are enjoying family farming and contributing to rural life as a result of avoiding large commercial farming operations. These young farmers are focusing on sustainable and regenerative farming methods, improving the quality of land, quality of food produced and yield. 2. Raising pigs in an environment that has no similarity to their natural habitat is inhumane. 3. The regulations around manure management does not avoid highly offensive, irritating and potentially diseases producing gases from polluting the air, as it can with small farm operations. 4. Concerns about the impact of the operation's water use for neighbouring farms and communities. 5. Concerns about nutrient flow from spread fields into the drinking water supply and nearby creeks that flow into Rock Lake which already has a high nutrient load. 6. Concerns about whether taxes paid by the corporation will adequately cover road maintenance cost and future road development.
<p>Pamela Leech Rock Lake, MB</p>	<p>CONCERNED Commenter has the following concerns:</p> <ol style="list-style-type: none"> 1. Concerned about the late receipt of notice of proposed operation form municipality and feels this does not reflect good faith in the process. 2. Concerned that the absence of the date application was submitted on the official notice may not represent procedural fairness. 3. They cannot determine from the submitted site assessment if a complete and accurate environmental impact assessment has been conducted and reviewed. 4. They want to know what the specific impact or science-based determination of impact on the aquifer is, as well as the general impact on the water availability for already operating farms and residents.
<p>E.G. Harrison Holmfield, MB</p>	<p>CONCERNED Commenter has the following concerns</p> <ol style="list-style-type: none"> 1. The proposed location is two miles from Holmfield, too close to the community from regulatory viewpoint. 2. This will be Hylife's second barn within three miles of Holmfield. 3. Concerns about dust and its impact on quality of life from the operations proposed truck routes. 4. Concerns about the ability of the heritage bridge in Holmfield to handle the increased truck traffic and maintenance cost for PR 458. 5. Concerns about air pollution to the residents of Holmfield due to the proximity of the operation. 6. Concerns about water pollution due to the composition of the soil in the area and the drainage linkage of both surface and ground water sources in the area.

<p>Gerald & Stella Black Cartwright-Roblin Municipality, MB</p>	<p>OPPOSED Commenters have the following concerns:</p> <ol style="list-style-type: none"> 1. They are concerned about the impacts of the proposed operation on water availability for residents. 2. They feel the information about abandoned wells in the site assessment is incorrect. 3. They are concerned about odour from the manure affecting their air quality on their field and in their yard. The commenters ask for the type of trees that will be planted as shelterbelt around the barns and how many years before they become effective. 4. They believe they own part of the proposed spread field for this operation and have not given Hylife permission to spread manure there or take soil samples for testing and are asking for documentation where permission was given for Hylife to take soil samples from their land. 5. They believe parts of the lands to be used for manure application for this operation are subject to annual flooding of the Long River and have not been addressed in the site assessment document. The commenters are concerned about the proximity of the manure injection fields to the water source of their cattle and questions who takes responsibility should their water supply become contaminated. 6. They feel the gains from this operation will be less than the negative effects.
<p>Jean Harrison Holmfield, MB</p>	<p>CONCERNED Commenter have the following concerns:</p> <ol style="list-style-type: none"> 1. Concerned about the sustainability of the water supply 2. Pollution of the water table due to the nature of the soil 3. Concerns about air quality and its effect on the quality of life 4. Increased truck traffic will increase dust blown from the gravel roads and affect the quality of life in Holmfield. 5. More truck traffic on PR 458 will cause more deterioration and damage. 6. Concerns about the inability of the historic team bridge in Holmfield to handle the increased truck traffic.
<p>Richard and Carolyn Boyce Rock Lake, MB</p>	<p>OPPOSED Commenters feel the location of the proposed operation in the Pembina Valley Watershed will increase the deterioration of water quality in the municipality which intern affects fishing and recreation.</p>
<p>Elaine Sartin Holmfield, MB</p>	<p>CONCERNED Commenter is concerned that this operation will increase odour in the community of Holmfield. They feel that heavy trucks travelling past the community of Holmfield will increase noise and dust and jeopardize the longevity of the Holmfield bridge.</p>
<p>Kathrine Bruce Holmfield, MB</p>	<p>CONCERNED Commenter has the following concerns:</p> <ol style="list-style-type: none"> 1. Quality of life gone forever 2. Odours from all directions 3. Water contamination 4. Deterioration of air quality 5. Destruction of the roads 6. Dust from trucks 7. Noise from trucks 8. Historic bridge removed
<p>Grant E. Boden Holmfield, MB</p>	<p>OPPOSED Commenter's first concern is about pollution of the air and nearby waterways from the proposed operation which they feel will be detrimental to their lifestyle and wellbeing. Their second concern is about the ability of PR 458 and the historic Holmfield bridge to handle the added truck traffic from the proposed operation. They feel the road was not built for such truck traffic and that there will be a substantial increase in the cost of road maintenance.</p>

<p>Kimberley Clark and Roderick Lovell Cartwright, MB</p>	<p>CONCERNED Commenter is concerned that the proposed operation will pose a risk to ground water and waterway contamination, complete loss of groundwater, smell, destruction of roads and the overall disregard for the rest of the agricultural operations and the people of the municipality.</p>
<p>David Hopper Holmfield, MB</p>	<p>OPPOSED Commenter is concerned that the proximity of the operation to the community of Holmfield would negatively impact residents of Holmfield. They feel that the use of PR 458 by trucks to and from the proposed hog barns will ruin the road and their link to highway 3. They also feel that large scale factory farms are not environmentally friendly and inhumane and should not be encouraged in the municipality.</p>
<p>Hubert and Doreen Clark Cartwright, MB</p>	<p>CONCERNED Commenters have the following concerns:</p> <ol style="list-style-type: none"> 1. There will be very little local participation in the construction of the barn leading to little cash injection to the local economy. 2. Hi tech barns employ very few people leading to little cash for the local economy. 3. Taxes gained from the operation will not be enough to cover the increased road maintenance costs caused by the operation's trucks and that will put additional burden on the local tax payers. 4. Dust from gravel road will negatively impact the quality of life for residents. 5. Concerned that manure spreading may destroy soil quality, contaminate underground water sources and the Long River due to its proximity to the operation. 6. Concerned about odour from the operation destroying air quality for residents. 7. They feel the operation will lead to a reduction in land value in the area. 8. They feel the operation will have a general negative impact on the quality of life for residents.
<p>Kevin Dyck Cartwright – Roblin Municipality, MB</p>	<p>OPPOSED Commenter is a third generation farmer who lives and works in the municipality. He feels that Hylife is not a neighbour, therefore allowing this operation to continue will destroy the way of life of the rural residents. He is also concerned that Hylife will destroy the roads with their trucks. He is scared that the odour from the hog operation will diminish any chance of a fourth generation to inherit his farm.</p>
<p>Don Edkins Cartwright, MB</p>	<p>OPPOSED Commenter states some pluses of the proposed operation to include more tax dollars, increased revenue, create employment, increase land value. He states the following negatives for which he is opposed to the proposed operation:</p> <ol style="list-style-type: none"> 1. Upgrade and maintenance of roads due to increase in truck traffic. 2. Concerns about the impacts on the environment. 3. Concerns of the effluent from the operation eventually polluting the Pembina River and Rock Lake, increasing the problems affecting the water in Rock Lake. 4. Odour from the operation affecting air quality in the town of Cartwright.

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.

Recommended Actions to Council

1. As per Section 114(1) 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 Brandon 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) post a copy of the notice of hearing on the affected property in accordance with 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 and total animal units 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 Brandon Community Planning Office), and
 - c) every person who made representation at the hearing.
4. Councils are requested to include in their resolution and/or Conditional Use Order, notification that the applicant may appeal council's decision to reject the application or appeal a condition imposed by council related to its approval as per Section 118.2 of *The Planning Act*.
 - As per Section 118.2(2)(b), an applicant may appeal the following decisions of a board or council to the Municipal Board:

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.
5. As per Section 118, no development or expansion of a livestock operation that is the subject of an application under this Division 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.
6. Council is welcome to contact Manitoba Conservation and Climate, 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.

Recommended Actions to Proponent

1. 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.
2. That as per Section 118.2(2)(b), an applicant may appeal the following decisions of a board or council to the Municipal Board:
 - (i) a decision to reject the application,
 - (ii) a decision to impose any condition on the approval.

F. TECHNICAL REVIEW COMMITTEE MEMBERS

Name	Department	Title Branch	Contact
Don Malinowski	Municipal Relations	Senior Planner <i>Community Planning Branch</i>	204-945-8353
Petra Loro	Agriculture and Resource Development	Livestock Environment Specialist <i>Agri-Resource Branch</i>	204-918-0325
Barsha Sagan	Conservation and Climate	Environmental Engineer <i>Environmental Approvals</i>	204-795-7175
Jeff DiNella	Infrastructure	Senior Development Review Technologist <i>Highway Planning and Design Branch</i>	204-945-2664

Appendix A

Agri-Resources Branch – Land Assessment Details

Crown Royal has met the land requirements for 18,000 nursery pigs (594 AU) as follows:

In areas of lower livestock intensity such as the RM of Cartwright-Roblin, 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 the region to balance manure phosphorus with crop phosphorus removal, should it be necessary in the future.

Typical, modern feeding practices for pig production were used to estimate nutrient excretion for Crown Royal. Realistic, long-term 10-year crop yields from the Manitoba Agricultural Services Corporation (MASC) for Risk Area 2 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. All of the lands with soil tests were below 60 ppm Olsen P, as required to be considered suitable. Semi-detailed soil survey is available to determine the agriculture capability of the land. The agriculture capability of the land included in the proposal is primarily Class 2 and 3 with some areas of Class 5. The main limitations are lack of moisture (M), slope (T), wetness (W) and salinity (N).

The required land base for Crown Royal is 979 acres. Crown Royal has exceeded the land requirement by demonstrating that they have access to 1,429 suitable acres.

Water 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 2002).

The proponent is planning to apply manure in both spring and fall. Applying manure in spring (closer to time of plant uptake) reduces risk of nutrient loss to waters.

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. The proponent is planning to apply liquid manure with partial injection, which will reduce N losses compared to broadcast application methods.

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 as a nutrient by which fertilizer application through manure, synthetic fertilizer, and municipal waste sludge to agricultural lands may be limited. To remain environmentally sustainable over a long-term planning horizon of 25 years or more, the proponent must be able to balance phosphorus inputs from applied manure and other nutrient sources such as commercial fertilizers with crop removal rates to avoid further build-up in soils. Consequently, sufficient land base

must be available such that manure can be applied at no more than 1 times crop P removal rates (P balance). For long-term planning purposes, the proponent needs to have sufficient land available to ensure that manure can be applied at 1 times crop P removal. The proponent acknowledges that 1,863 acres may be required for the long-term environmental sustainability of the operation. The proponent has identified 1,429 acres for manure application. Application to meet crop N requirements is estimated to use 979 acres. Application at 2 times the crop removal of P is estimated to use 931 acres (1,863 acres is estimated to achieve P balance (phosphorus removal equal to phosphorus application) with current crop choices and yield potential).

As phosphorus levels build up in soils, the concentration of phosphorus 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 prevent excessive P buildup when applying manure at rates above P balance (P removal by harvested crops).

The soil test reports and air photos indicate potential for elevated soil salinity on NE&SE 5-3-15, SE 25-2-16 W1 and SW 30-2-15 W1. Saline areas generally have reduced yields and are therefore prone to nutrient buildup when manure (or fertilizer) is applied at the same rate as more productive parts of the field. Field areas that are less productive should be monitored for nutrient buildup and may require different management.

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 – Proponent Response



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March 11, 2021

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 -12-080 (Crown Royal Nursery)

HyLife would like to acknowledge the concerns raised by residents regarding our proposed Crown Royal Nursery pork production operation on NW-30-02-15-WPM in the Municipality of Cartwright-Roblin. 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 Cartwright-Roblin, 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 Crown Royal 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 "GENERAL AGRICULTURE AREA" in The Cartwright-Roblin Planning District Development Plan, By-Law No. 23/2002 adopted in 2002. 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 Cartwright-Roblin Community.

Within the development plan, specifically for the rural areas in the former RM of Roblin, specific overall objectives were established for this area:

3.2.1 To protect agricultural land for present and future production and to foster growth and development in the industry.

3.2.2 To encourage growth and diversification in the agricultural economy and to support the development of agro-related industrial and commercial activity in a manner that is compatible with municipal servicing capabilities and sensitive to the environment and the provincial highway system.

3.2.3 To direct the establishment of livestock production operations, or any potentially environmentally harmful agricultural-related development, to areas of the municipality where the environmental impact and the nuisance (as determined by the Board) will be minimized.

3.2.4 To develop policies which will promote the orderly efficient and environmentally sound development of lands within the fringe area of the Village of Cartwright.



3.2.5 To conserve those areas that because of soil type, topography or proximity to the lakes are best suited for natural habitat or recreation uses and to ensure that any development protects the natural amenity of these areas for use and enjoyment of present and future generations.

3.2.6 To ensure the orderly use and development of residential, commercial and industrial areas in Mather in a pattern that minimizes conflicts and encourages a healthy and pleasant living environment.

3.2.7 To maintain the rural and agricultural heritage and character of the district and to promote a healthy and sustainable environment

HyLife has carefully chosen the proposed site as it is located in the “General Agriculture Area” 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 facility. 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. This 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 odor 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, it will also create greater lift to better dissipate and diffuse odours.

With respect to manure nutrient application, our plan is to apply manure in the spring pre-seeding and fall post harvest as a twice per year event. Manure nutrient application will be done on an anticipated 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 Pembina 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 Crown Royal 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.

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 3 new staff for the proposed Crown Royal Nursery operation. There will also be an addition of 2-3 feed trucks and 4-6 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 458 which is provincial road maintained and under the jurisdiction of Manitoba-Infrastructure. This primary traffic route was provided to HyLife from the RM of Cartwright-Roblin as the preferred traffic route for this site.

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.



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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.

