



May 14, 2021

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

Attn: TRC Coordinator

Re: TRC File No. TRC-12-084 (Topigs Norsvin Nucleus Site 2)

At Topigs Norsvin Canada, we recognize that formal public review of a proposal vetted through provincial and local governments processes are an important component in Manitoba's livestock review and approval process. We are pleased to participate in this public consultation process. We propose to build a 1,459 Animal Unit (AU) Hog Finisher livestock operation on 80 acres on the N1/2 of the NW16-17-11W in the Municipality of Westlake-Gladstone.

On behalf of Topigs Norsvin Canada, I wish to acknowledge and thank all persons and organizations that have submitted comments and concerns to the Technical Review Committee (TRC) on our application. And we respect the many views and comments received. We have carefully reviewed and considered all comments and concerns. We also appreciate the opportunity to correct some apparent misconceptions and misinformation regarding our proposal. In doing so, we will also outline how the various concerns can be addressed or mitigated.

But first before getting into specifics, please let me describe again who Topigs Norsvin Canada is and what we are proposing to build and operate in the Municipality of Westlake-Gladstone.

Topigs Norsvin Canada and Delta Canada Research Centre

We are the world's most innovative swine genetics company. We employ and rely on many of the most renowned and published animal scientists and geneticists in the world. We are part of a farmer owned cooperative that first started in The Netherlands. Today, we are international and are present in 54 countries with over 700 employees.

We are also proudly a Canadian subsidiary company, since 1994. Our Topigs Norsvin Canada head office is located at Oak Bluff, MB in the R.M of MacDonald. We currently have 68 employees with over 60 employed at Oak Bluff and at various farms in Manitoba located in the R.M.'s of Armstrong, Piney, Rockwood and Woodlands. We are also the largest swine breeding stock supplier in Canada.



Delta Canada Research Centre



CT Scanning a Live Boar

Our Delta Canada Research Centre opened in 2018 in Woodlands, Manitoba. It is the heart of our Research and Development Program targeting maximum genetic progress. We use state of the art technology including CT scanning for high density data collection on live, high health breeding boars. We measure traits by collecting data and scoring the pigs for carcass and meat quality, feed efficiency, health, robustness, and productivity in order to make genetic selection and better breeding animals. Many of our research initiatives are done in collaboration with the University of Manitoba Animal Science faculty and post-graduate students.

Genetic Nucleus (GN 2021) Project

Our proposal is to establish a newly estimated \$29 - 30 million Genetic Nucleus Farm in the Municipality of Westlake-Gladstone. If developed in 2021-22, it will become an integral part of Delta Canada's Research & Development Program. GN2021 will provide candidate breeding stock for continuous performance testing and selection while also ensuring high animal welfare with low environmental impact. We propose a 1,600 space (710 AU) Sow Farrow to Nursery on Nucleus Site 1 and 10,200 space (1,459 AU) Finisher operation on Nucleus Site 2. The two sites are located roughly 3.5 miles apart and are generally located over 7 miles northeast of the Plumias settlement centre. Both are on open cropland but with relatively few residences within 3 km of Site 1 and no residences within 3 km of Site 2.

Topigs Norsvin Canada's new barns will introduce and utilize enhanced animal welfare concepts to our high health, breeding herd. This will include increased floor space per pig, open farrowing pens and loose housing during pregnancy, climate controlled indoor temperature, cooling and ventilation, automatic individual feeders and drinker stations, and the introduction of "play pen items" to root and provide stimulation. Close animal care and health monitoring of the swine herd will be done to help in the selection of the best candidates to go to Delta Canada for CT scanning, performance testing and scoring. We also utilize specialized trailers that provide extra space, access to fresh drinking water and mechanical heating and cooling ventilation for livestock transport.

In total, GN2021 will create up to 25 new jobs and boost the local economy.

Community Consultation

Some public comments received by the TRC expressed disappointment over perceived lack of public consultation on the project. This is unfortunate given Topigs Norsvin Canada's best efforts to consult with the community under trying Covid 19 limitations and winter weather conditions. We drove in separate cars, wore PPE masks and physical distanced, whenever we met someone.

We were pleased to participate in a virtual Town Hall organized by the Municipality on December 11, 2020 to describe our then conceptual project to the community. Later, in our early project planning and site options/feasibility review stage, we met with a number of farm producers and area neighbours door-to-door armed with pamphlets to introduce ourselves, the GN2021 project and to talk about possible opportunities in the general area. We also received a number of telephone and email inquiries from interested parties which we appreciated and followed up on.

Project specifics were premature to share until feasibility and site reviews, preliminary project design and proposals were completed. Yet we believe it was still worth-while and important to reach out early to inform the community and to obtain initial views and expressions of interest. We hope that our many incremental efforts to reach out and inform would be appreciated by the community. In fact, none of this early consultation was mandatory. We took the time. Made the efforts to inform and are pleased that we did.

Livestock Review & Approval Process

Once final proposals are complete and formal applications are made, interested residents and public have two opportunities to review all details of project proposals and to comment in the provincial livestock TRC and local Conditional Use application, review and approval processes. Adjacent municipalities and First Nations governments, planning districts and other non-governmental organizations are also afforded the opportunity to provide input and make their views known.

Our intent at this first stage in the formal review process is to obtain conditional use approval. This would enable us to commit to and proceed with more detailed designs, plans, and a multitude of other local and provincial permit applications. Under The Planning Act, all approvals would need to be obtained before any development can begin.

Conflict of Interest

Rumours of possible conflict of interest against the Municipality's Chief Administrative Officer (CAO) in relation to the GN2021 Site 1 (or for that matter, Site 2) proposals is completely unfounded. We have found the CAO's actions to be ethical and professional at all times.

We understand that a declaration of a possible conflict of interest was declared to the Municipal Council. Thereafter, we as development proponent have not had any contact with the CAO, nor Municipal Council members in the final development and formal submission of this application.

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. We believe that this is some of the strictest requirements in North America. This process includes a mandatory provincial government technical review, public reviews, formal public hearing and other provincial and local council approvals.

In particular, this proposed livestock operation must meet the requirements of The Planning Act, The Groundwater Protection Act, The Environment Act, (Livestock Manure and Mortalities Management Regulation), The Water Protection Act (Nutrient Management Regulation), The Water Rights Act (Water Licensing Regulations), The Workplace, Health & Safety Act and the Manitoba Farm Building Code (fire safety and fire protection) the latter of which is enforced by the Office of the Fire Commissioner. Depending on the nature and location of the proposed project, other Provincial Acts and regulatory requirements may be applicable.

Strict government requirements based on good science, good land use planning, professional engineering design and construction, and on-going government monitoring and enforcement protects the overall Public Interest and balances the conservation and wise use of natural resources, environmental protection, public health and safety and the economy.

Agriculture Area and Agricultural Zoning

We have selected Nucleus Site 2 at this location because “annual crop farming and other livestock operations” are the predominant developed rural land use in the area. The site is ideally located on wide open farmland that provides a sustainable land base to apply organic manure nutrients for crop production. It has relatively few occupied dwellings nearby and also meets our requirement for a 5-mile biosecurity buffer from other major swine operations. Moreover, it is close to good access roads, water supply and within reasonable distance to hydro. This location within the Westlake-Gladstone Municipality also provides regional access to the provincial highway network, a reasonable travel distance to the Winnipeg International Airport and our head office in Oak Bluff, MB.

The proposed 80-acre site is designated "AGRICULTURE" in The Westlake-Gladstone Development Plan, By-Law No. 2019-04. This Bylaw was prepared with extensive community review and was approved by local Municipal Council and the Province of Manitoba. It provides long range and consistent local land use planning and sustainable development policies to guide future growth and development of the Westlake-Gladstone Community.

Amongst other development objectives and policies Section 5 Rural General states that:

“Rural areas of the Municipality celebrate a rural way of being protecting the ability of agricultural producers to adapt and grow their operations as necessary; and allowing newcomers the opportunity to engage in agricultural activities in a respectful and meaningful way. Rural areas support the agricultural economy, which is the backbone of Westlake-Gladstone”.

The proposed site is also zoned “AG” Agricultural General in the Municipal Zoning By-law No. 1937, as amended. The proposed major livestock operation is a conditional use in the “AG” zone requiring local and provincial review to ensure that the proposed development would conform to the development plan, is properly sited and compatible with surrounding land uses.

Compliance with minimum separation distances in local zoning and provincial regulations are key measures of proper siting and compatibility with other rural land uses. Combined, this serves to avoid land use conflicts and provide environmental protection. This includes minimum separation distances and setbacks to property boundaries, single residences, designated land uses, wells and watercourses and designated crown lands.

This proposal meets every zoning requirement. Indeed, in many instances, it also exceeds the minimum separation distance requirements of both the livestock facility, manure storage facility, farm pond and other accessory structures.

Odour Control

Farming is a way of life. Those of us who choose to live on or near a farm, soon come to realize that there will be times when some farm smells will be present. This proposed livestock operation at Site 2 is typical of modern finisher farm operations that today already successfully and sustainably operate throughout many parts of Agro-Manitoba.

Provincial government regulations and local zoning establish minimum separation distances from major livestock facilities to designated towns, settlement centres, other designated areas and residences.

We have carefully chosen the proposed two sites in the Agriculture area that not only have relatively few residences but ensure that all separations distances are not only met; but in many instances are exceeded. These site locations also provide extra distance from residences and are situated on the leeward side of the most prevailing north-westerly winds. For Site 2, the closest neighbour would be 2.3 miles (3.7 km) to the south-west.

Despite this large distance, we still propose to plant a two-row shelterbelt around the barns and earthen manure storage facility. We will also obtain the advice of a horticulturist regarding appropriate and hardy tree species, preparation of planting beds and growth and maintenance practices to use.

The earthen manure storages (EMS) will be a two-cell lagoon that will provide a means for solid-liquid separation partial treatment. While we do not propose to install covers on the EMS because of our rural agricultural remote locations; we commit to enter into a development agreement that would require us to install a cover if deemed warranted by Council in future. We ask that we be given the opportunity to operate for at least a full year to see if a cover needs to be installed.

We have enough spread acres to enable us to apply manure on a multi-year rotation cycle. The manure nutrients will only need to be applied on 600 to 750 acres per year for proposed Nucleus Site 2. This will be strategically applied over 2 - 3 good weather days only one time in the fall and after harvest. Normally, this is when there is cooler weather outdoors.

We will also be using modern drag line manure applicators in the fields that slit the soil and dribble manure into the soil. Normally, it would take 24 to 48 hours to dry and be as stable in the soil as synthetic chemical fertilizers or other animal manure on the land. In dry years, the liquid manure could be soaked up within ½ to 1 hour.

All mortalities will be kept indoors in cold storage to prevent odour and decomposition until it is time to transport for commercial rendering.

Taken together, adherence to all minimum separation distances (and in most cases even exceeded), compliance with government regulations and industry best practices will prevent intense and prolonged exposure to odours so that it will not pose a health risk. In fact, other than the few days required to spread manure nutrients on cropland, odour from the barns and earthen manure storage should barely be even noticed by residents due to the large separation distances.

Protection of Ground and Surface Water Quality

Provincial regulations regulate all activities that have the potential to contaminate both surface and groundwater supply. 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, individual residential septic fields and earthen manure storage (EMS) for livestock operations.

The EMS for our proposed project will be designed by, supervised during construction and certified by a professional engineer. It will comply with rigid geotechnical and design specifications to ensure structural integrity to protect ground and surface water and the environment. Some public comments were concerned that the operation was only 212 m to 220 m to the Big Grass River. As proposed, the proposed EMS would be 1.5 km south of the river and separated by elevated roads, cultivated farmland and a vegetated manmade berm lining the bank edge of the Big Grass River.

The EMS, barn structures and farm pond reservoir will all be designed and constructed to meet flood protection levels as determined by Manitoba Infrastructure, Hydrologic Forecasting & Water Management and local zoning by-law requirements. This is already a common mitigation measure that has been successfully used in the Red River Valley Special Management Area that includes most of the Winnipeg Capital Region and the Interlake Region.

Like many larger farm operations, we will have an annual manure management plan prepared by a professional agronomist or certified manure management planner. Based on annual soil testing, nutrient budgets will be calculated to meet Environment Act, Manure & Mortalities Management Regulations. Application rates will vary based on soil test results and the agronomic requirements of the crop. We will also use licensed commercial applicators with GPS equipped applicators that will track application during manure application and incorporation into the soil.

There are more than sufficient spread acres available to meet the land base required to apply manured fertilizer. At the request of the landowner, the S1/2 of 24-17-12W has been eliminated as spread fields for proposed Nucleus Site #2. It should be noted that there is still surplus land to sustainably meet nutrient land base requirements.

Provincial regulation also 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.

Annual manure application is recorded and is monitored and subject to audit and enforcement by Manitoba Conservation and Climate.

Sustainable Water Supply

Connection to the regional water utility to supply to the proposed livestock operation will be used only for domestic purposes for staff washrooms, showering and cooking. It will not supply water for livestock.

Water supply for livestock will be treated surface water stored in an on-site farm pond that will be filled once in the spring from surplus flows in the Big Grass River and/or from nearby road-side ditches if available. This will help somewhat to reduce potential spring flooding in the area. The farm pond will also provide standby water for emergency fire protection if ever required.

A Surface Water Rights License application has been applied for this project. In processing the application Manitoba Conservation & Climate will ensure that priority for water supply will be given to existing users and the environment before any future allocation to new users. A hydrologic assessment by the Province will determine a 10-year average for the surface water supply. It will then save 20% of the calculated volume of water to retain as sustainable risk threshold. Of the remaining 80%, ½ is also saved for the environment (e.g. conservation and protection of aquatic habitat, wildlife, bio-diversity, etc.). The other ½ (40%) is available for water use allocation on a first come first served basis with again existing users receiving priority.

Use of Antibiotics

Topigs Norsvin does not use antibiotics in feed or water and does not use routine antibiotic injections. Antibiotics are only given to individual animals for specific medical reasons. If the pig is sick, we treat it. All medications are controlled by veterinarian prescription and recorded. All medications and health are closely monitored by veterinarians who make monthly visits.

We rely primarily on a combination of strict bio-security, robust genetics and comfortable, climate controlled living environment with more space, open farrowing and group housing, specialized feeders and drinkers, pen enrichments and close health monitoring to provide our farm animals with good and healthy lives.

The Canadian pork industry also promotes and educates pork producers to limit use of antibiotics through industry programs such as Canadian Pork Excellence (CPE) and related on-farm programs:

- PigSafe – food safety and bio-security
- PigCare – animal care and a revised Animal Care Assessment (ACA)
- PigTrace – improved traceability for emergency risk management

Road Condition and Traffic Safety

There will be 3 feed trucks and 3 livestock trucks per week servicing Nucleus Site 2. This roughly equates to about 1 truck per day on average. Actual truck schedules will vary depending on feed and livestock delivery schedules. Some days there may be no truck, tomorrow there may be two. There will also be 3 vehicles per day for staff and visitors. All vehicles will comply with speed & load restrictions.

Vehicle traffic will travel from PR 260 along Rd 99 N for approx. 6 or 7.5 miles to Site 2 (depending on which final north-south mile road route is taken).

Rural Quality of Life and Property Values

Manitobans are decent, hardworking people. This is perhaps nowhere more so than in a rural farm community. Neighbouring farmers and rural residents get to know each other and are often willing to help each other out when someone is in a bind.

Living in a designated “Agriculture” area means that crop and livestock farmers and rural residents need to co-exist together. This includes the recognition that normal farm activity, traffic, dust, noise and smells should be expected; particularly at peak times for seeding, spraying, harvesting and fertilizing.

Mutual respect and the willingness to co-exist together fosters a strong sense of community. It also contributes to a high quality of life for all while still attracting and accommodating new development and employment opportunities in the Municipality.

Our proposed GN2021 project is in general conformity with the overall objectives and policies of the adopted Westlake-Gladstone Development Plan and complies with all local zoning by-law requirements. These in combination with other measures and requirements will create effective safeguards to protect the rural and natural environment. This includes strict compliance with all provincial regulations, adoption of appropriate flood mitigation measures coupled with good project design and livestock operations “best practices”.

Together, these multi-layered measures will ensure our proposed development including regulated manure fertilizer spreading will:

- **not** directly or indirectly adversely affect land and waterways including the Big Grass River-Jackfish Lake-Big Grass Marsh environs, wildlife management areas, bird refuges, community pastures and other crown and patented lands in the Lake Manitoba watershed,
- **not** pose a risk to health, safety or the environment,
- **not** degrade rural farm and residential property values,
- **not** diminish the rural quality of life in the area; and
- **will** be compatible with the general nature of the surrounding Agricultural Area.

Topigs Norsvin Canada looks forward to being an active and contributing member of the Westlake-Gladstone community and to fostering good neighbour relations with all residents, producers and local area business community.

Best regards.



Mike Shaw
Director Genetic Services
Topigs Norsvin Canada Inc.

