



TECHNICAL REVIEW COMMITTEE

**A TECHNICAL REVIEW REPORT
PREPARED FOR THE**

**RURAL MUNICIPALITY OF
HANOVER**

BURNBRAE FARMCO19 INC.

SE $\frac{1}{4}$ 5-6-5 EPM

TRC 12-117

October 28, 2025

A. INTRODUCTION – THE TEAM

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

Agriculture (AGR)

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

Natural Resources and Indigenous Futures (NRIF)

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

Environment and Climate Change (ECC)

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

Manitoba Transportation and Infrastructure (MTI)

- Senior Development Review Technologist
- Senior Flood Protection Planning Officer

Municipal and Northern Relations (MNR)

- Community Planners

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

THE TECHNICAL REVIEW COMMITTEE (TRC) REPORT

Purpose of TRC Reports

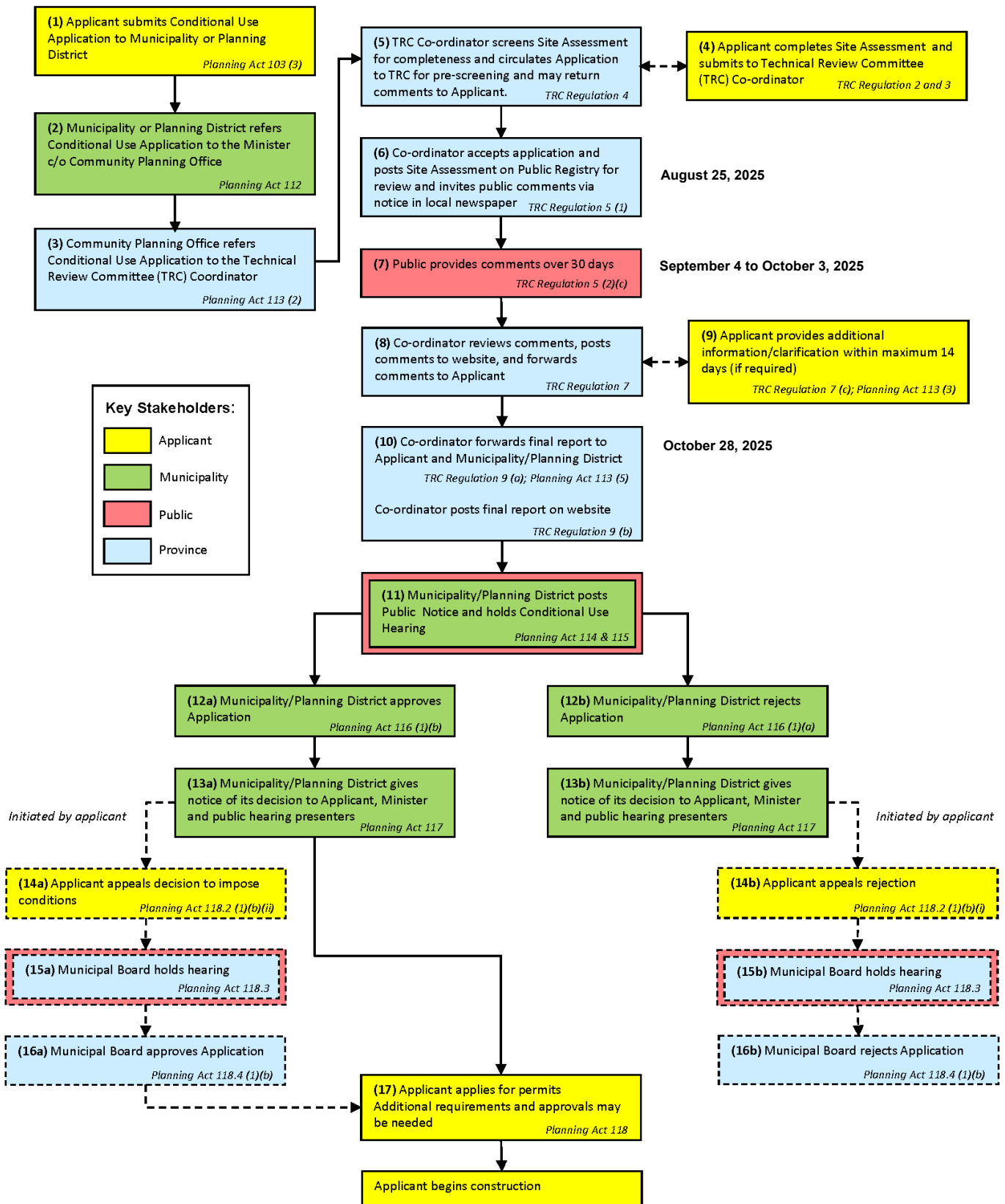
To provide objective, credible, technically-based assessments that:

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

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

Livestock Technical Review Process

(June 19, 2024)



B. DESCRIPTION OF PROPOSED LIVESTOCK OPERATION

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

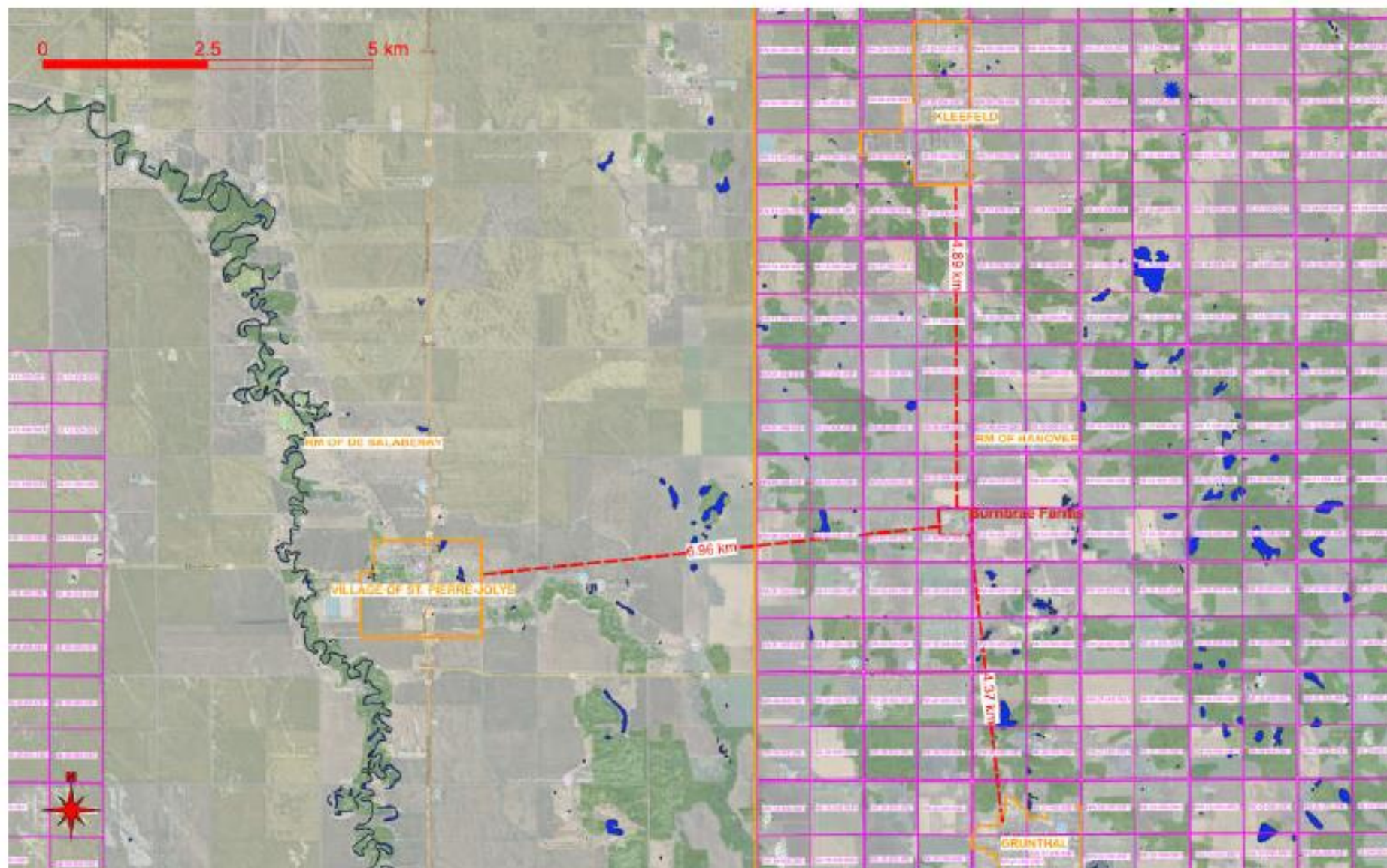
Applicant: Burnbrae FarmCo19 Inc.

Site Location: SE ¼ 5-6-5 EPM (Refer to map below)

Proposal: The applicant proposes to expand a current livestock operation. The proposal involves increasing the number of layers from 90,000 to 200,000 and the number of pullets from 37,500 to 42,000. This represents an increase from 871 to 1,799 animal units.

This will involve the following:

- Construction of two new layer barns and accompanying manure storage facilities for each;
- Use of permanent solid manure storage facilities;
- Estimated daily water use of 14,278 imperial gallons from an existing well;
- Composting of mortalities; and
- Truck haul routes as shown in map below.

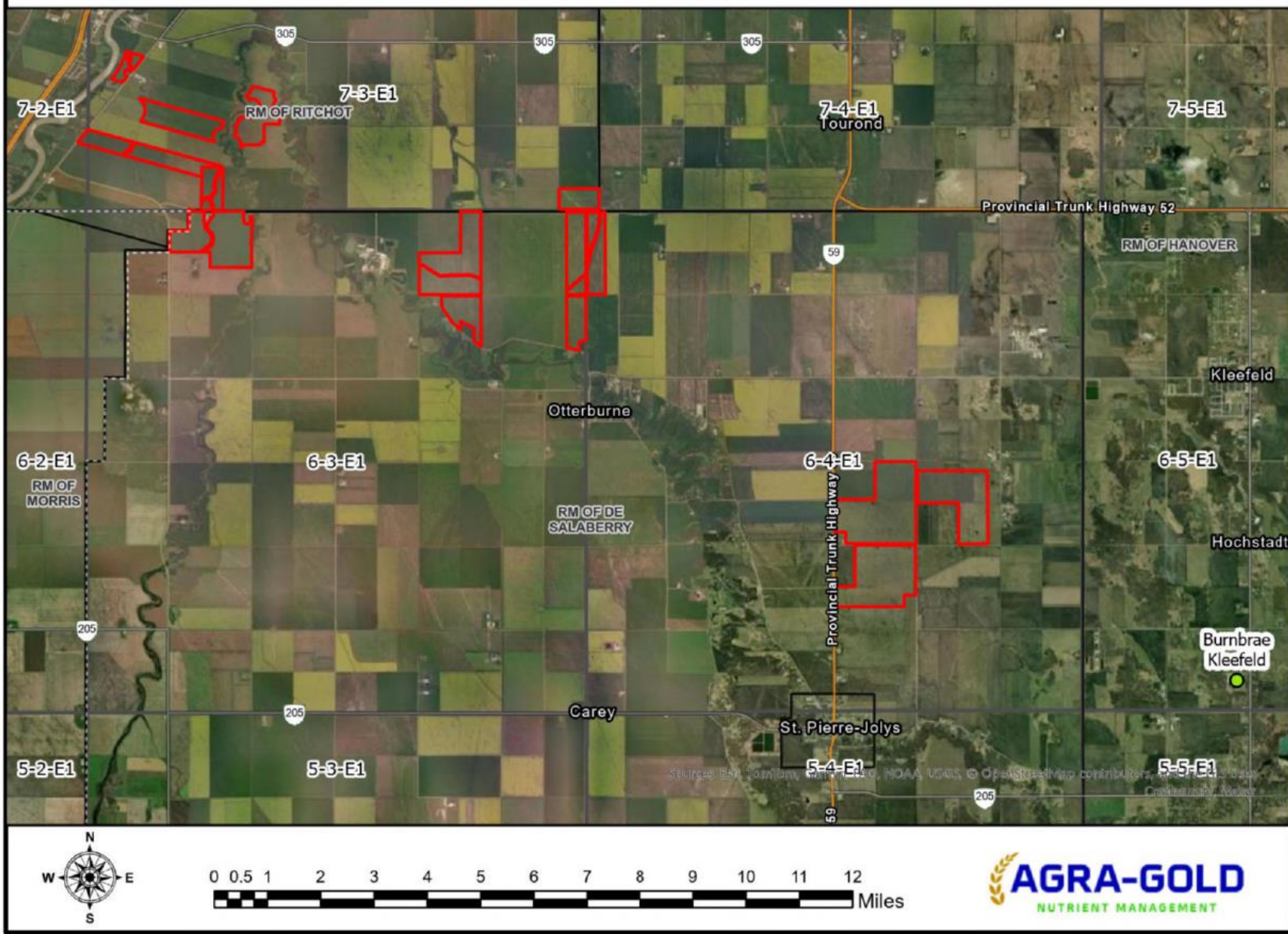


Location Map



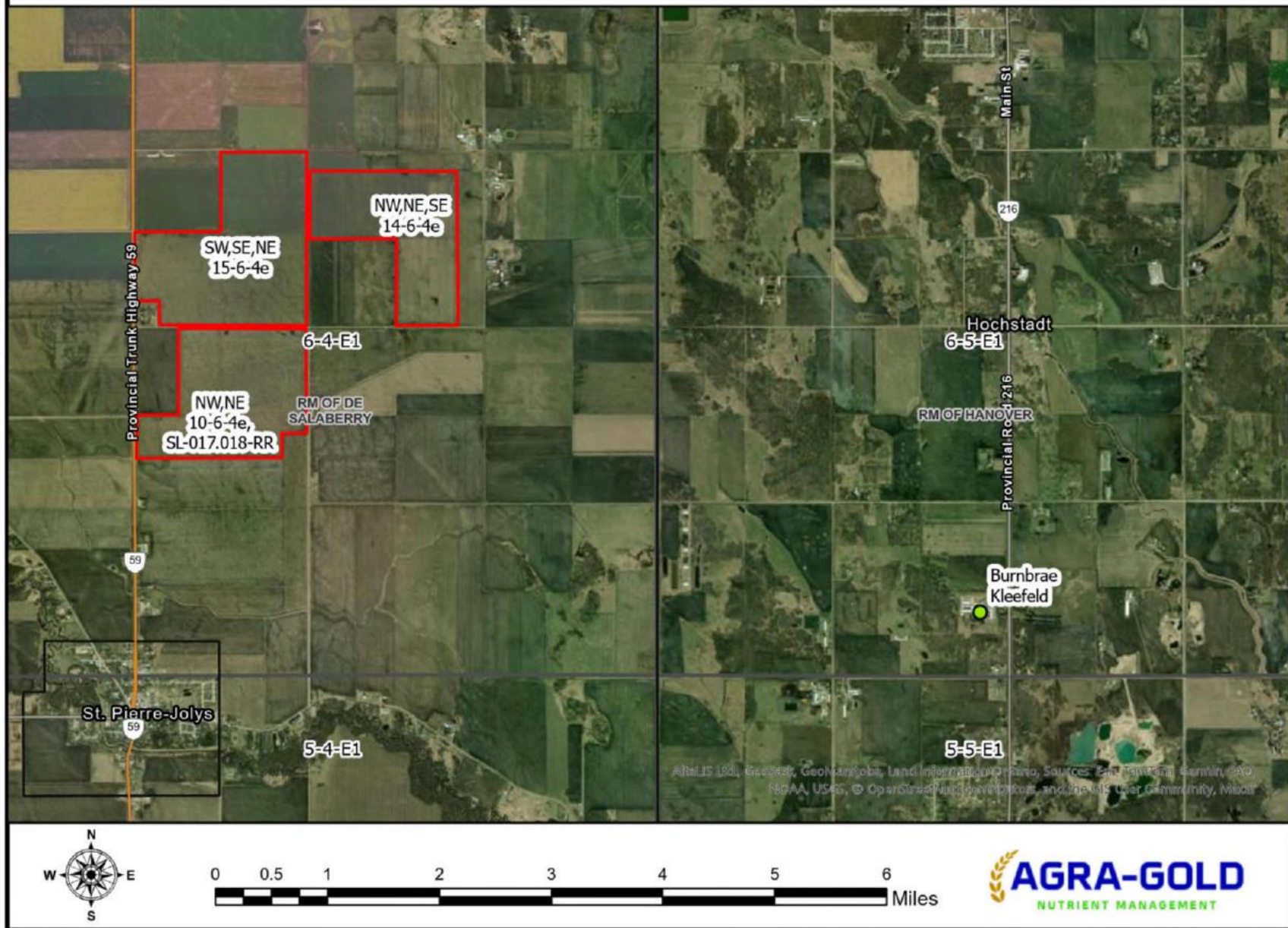
Site Map

Burnbrae Kleefeld Manure Spread Fields (June/25)



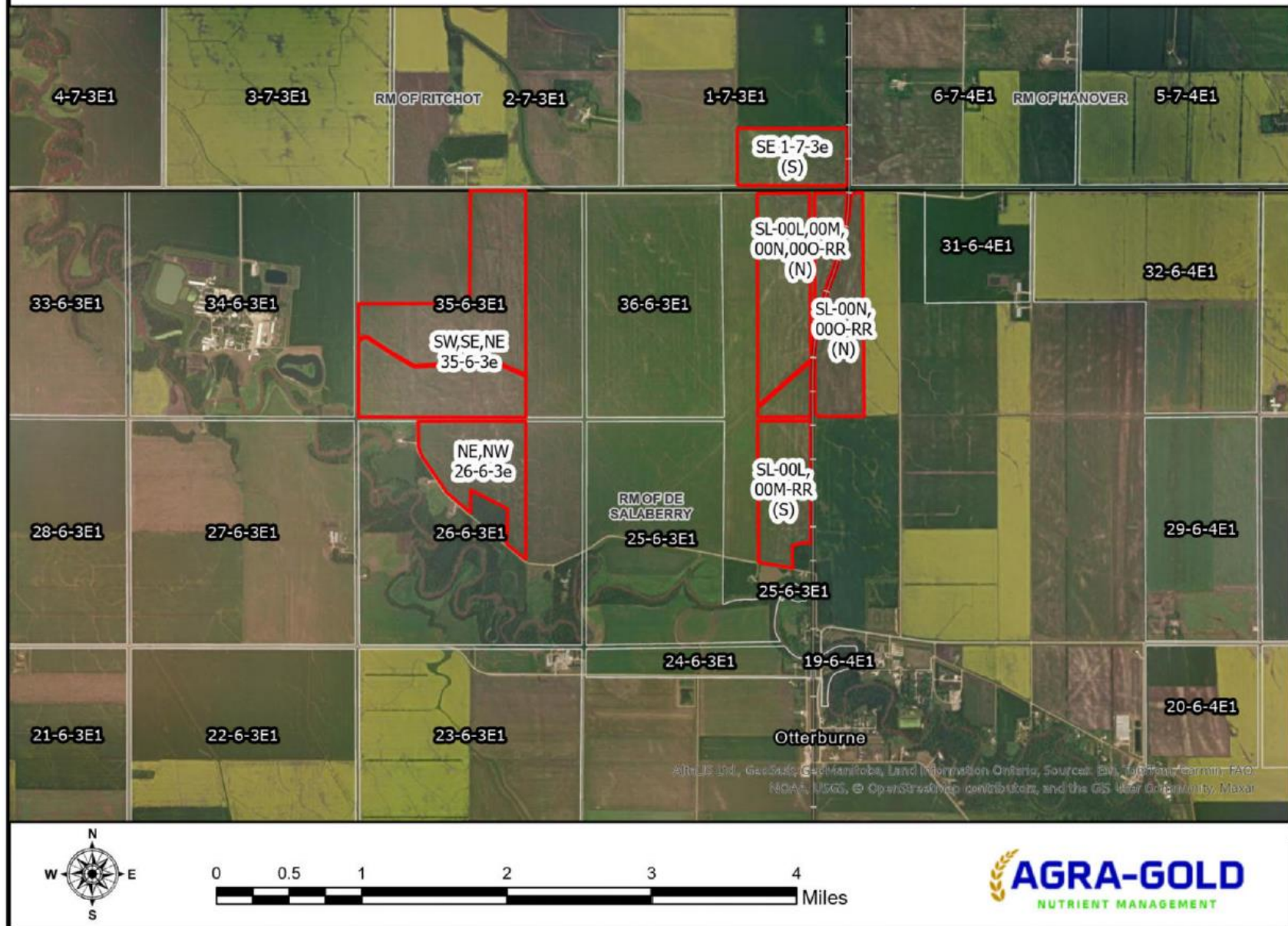
Spread Field Map (1)

Burnbrae Kleefeld Spread Fields SE (June/25)



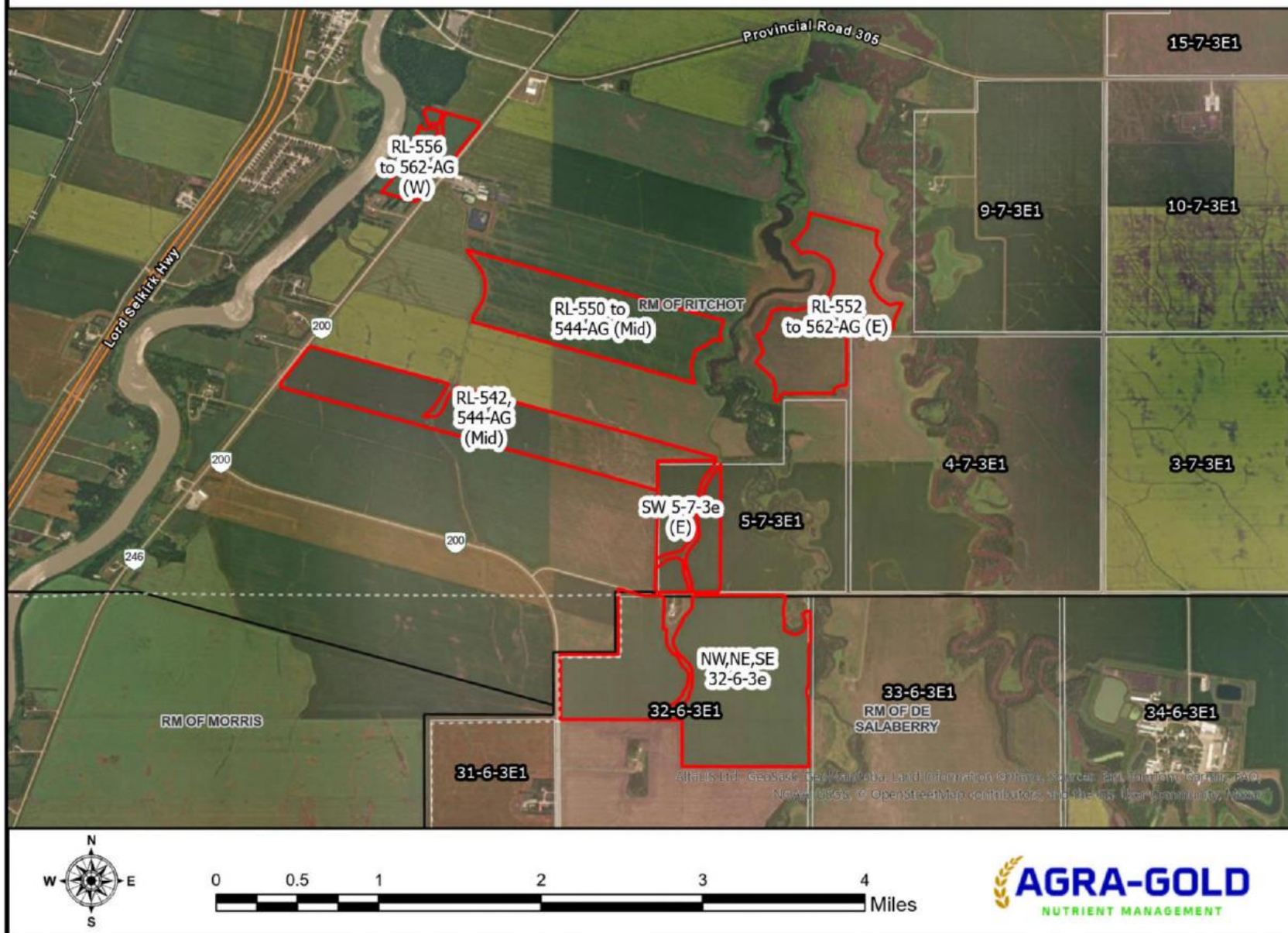
Spread Field Map (2)

Burnbrae Kleefeld Spread Fields Mid (June/25)

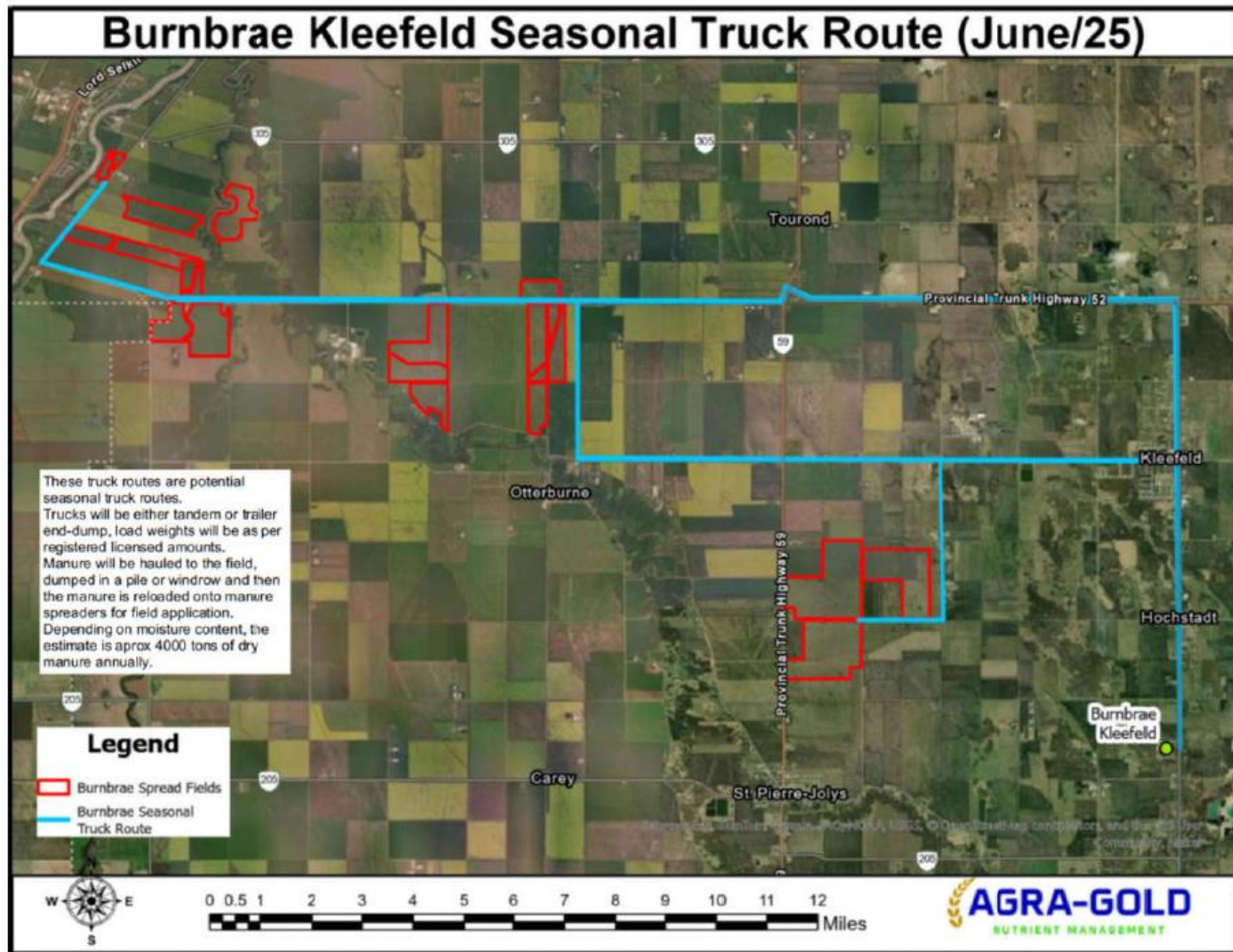


Spread Field Map (3)

Burnbrae Kleefeld Spread Fields NW (June/25)

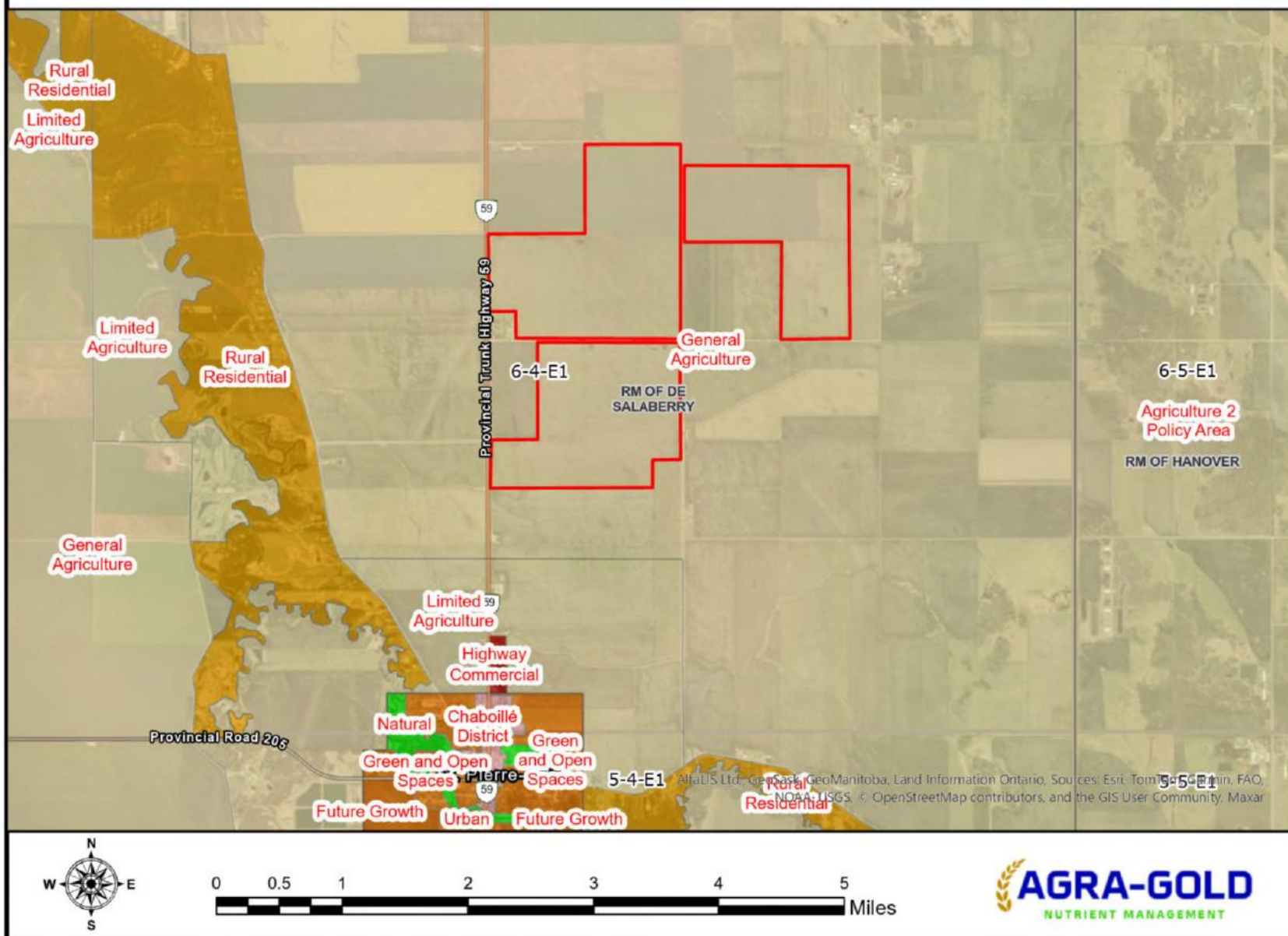


Spread Field Map (4)



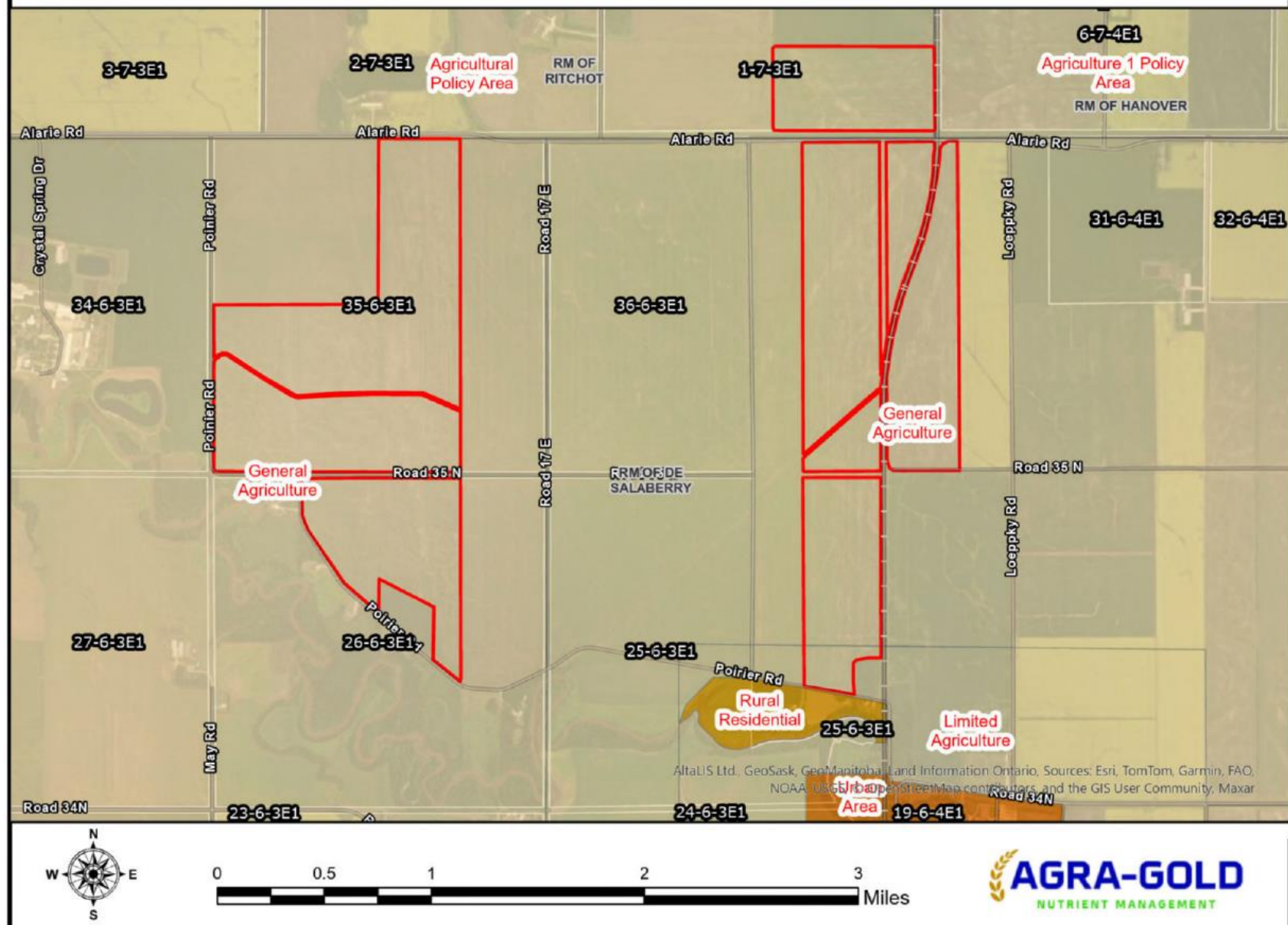
Truck Haul Route Map

Burnbrae Kleefeld RM Dev. Plan SE (June/25)

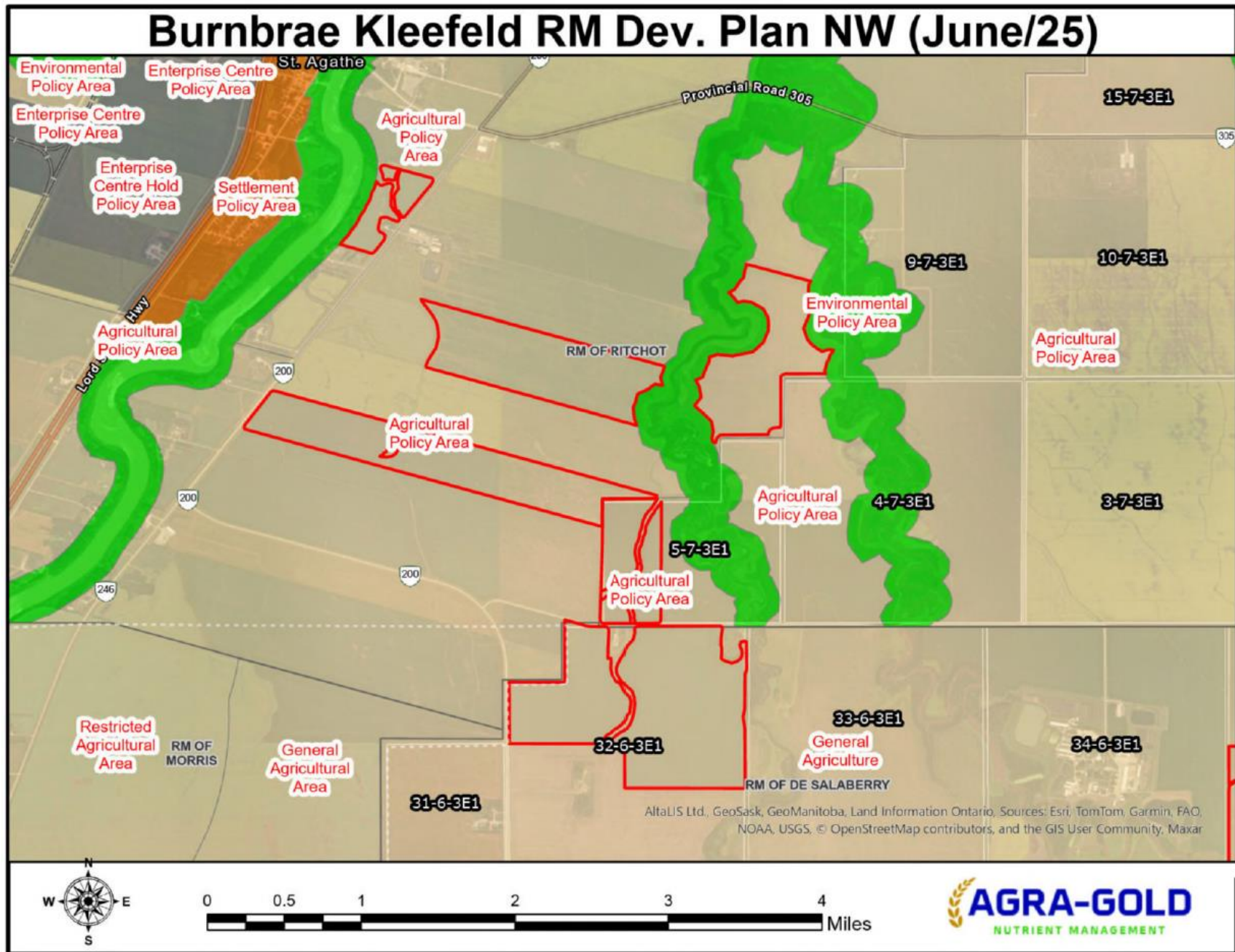


Development Plan Map (1)

Burnbrae Kleefeld RM Dev. Plan Mid (June/25)

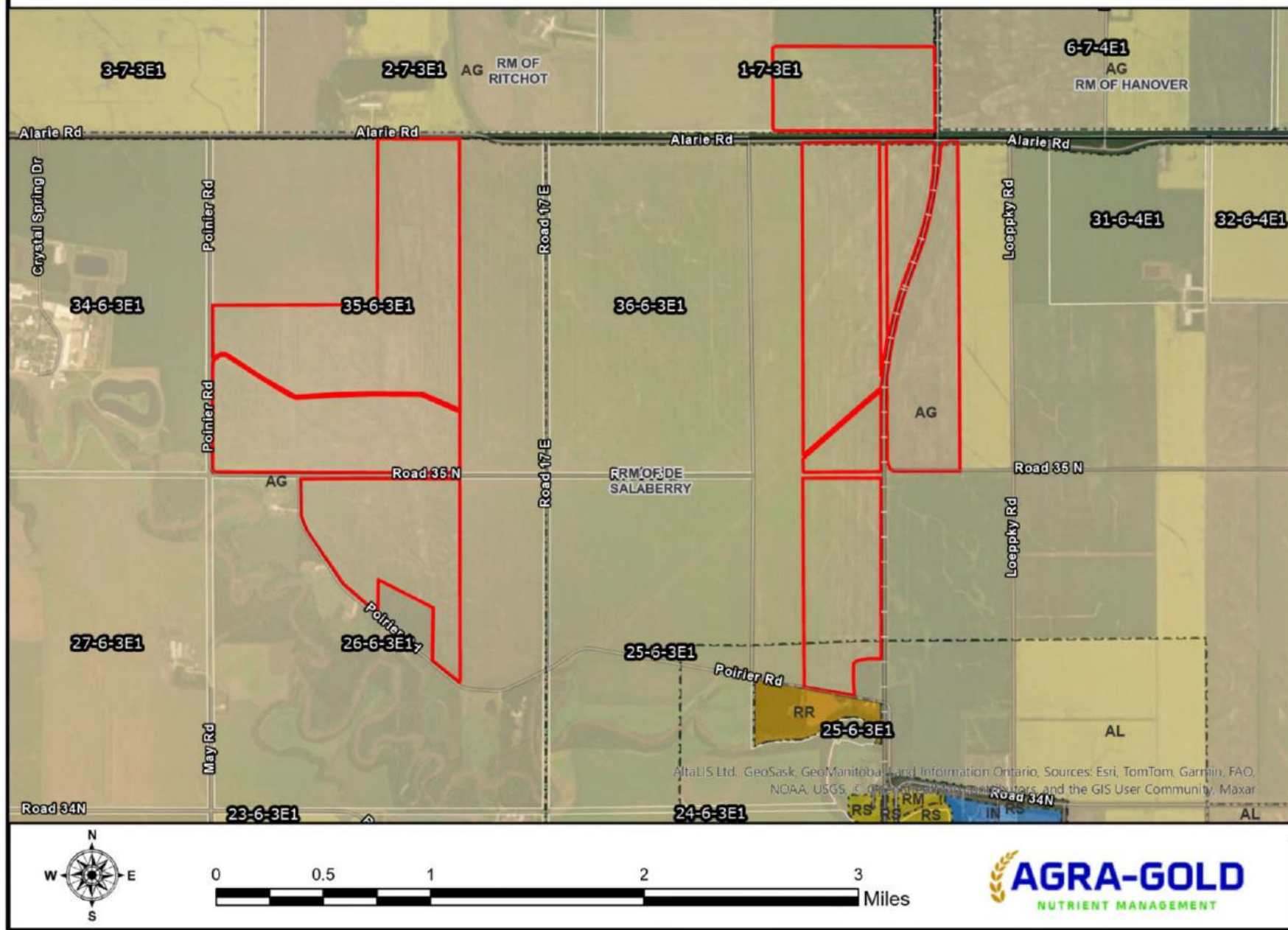


Development Plan Map (2)



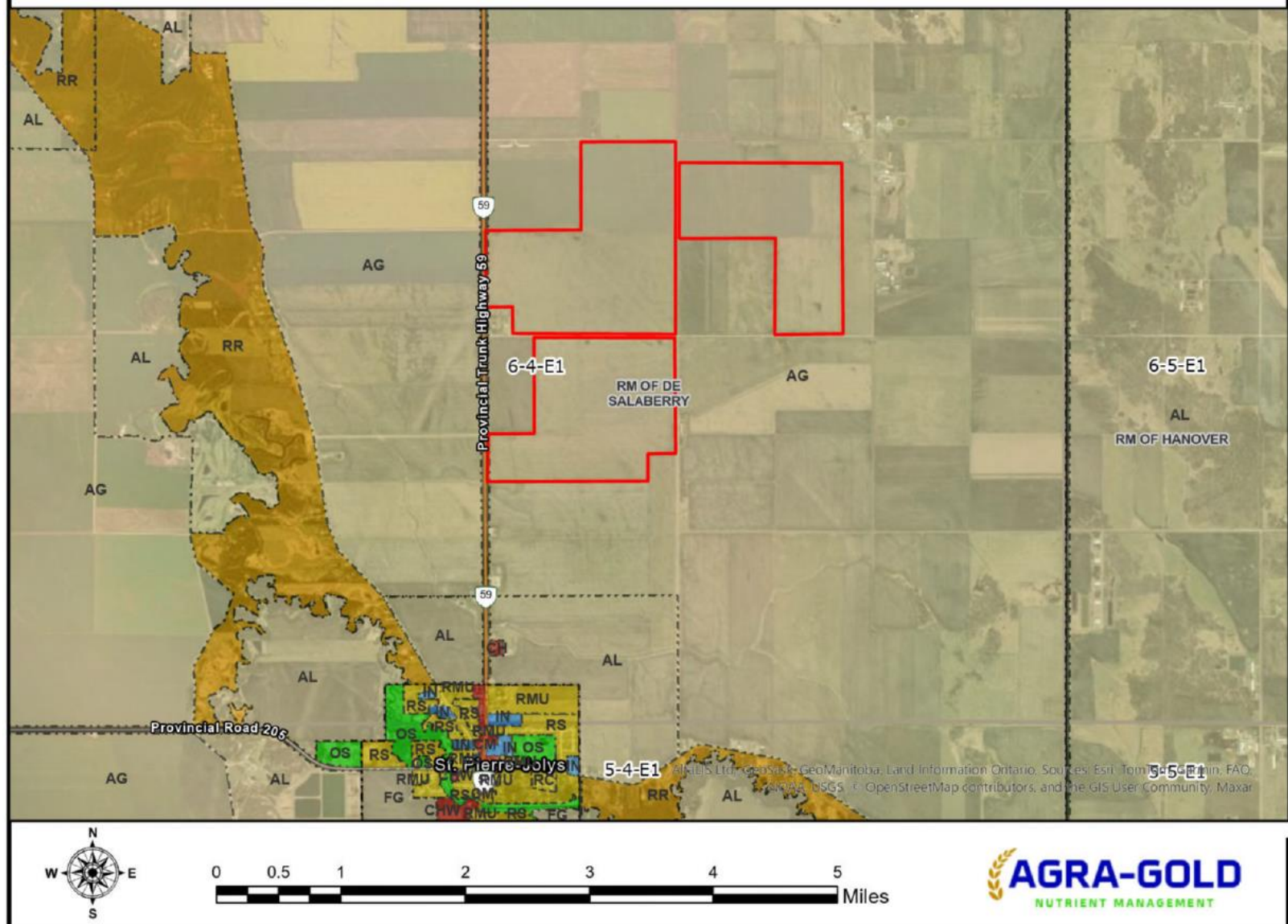
Development Plan Map (3)

Burnbrae Kleefeld RM Zoning Bylaw Mid (June/25)

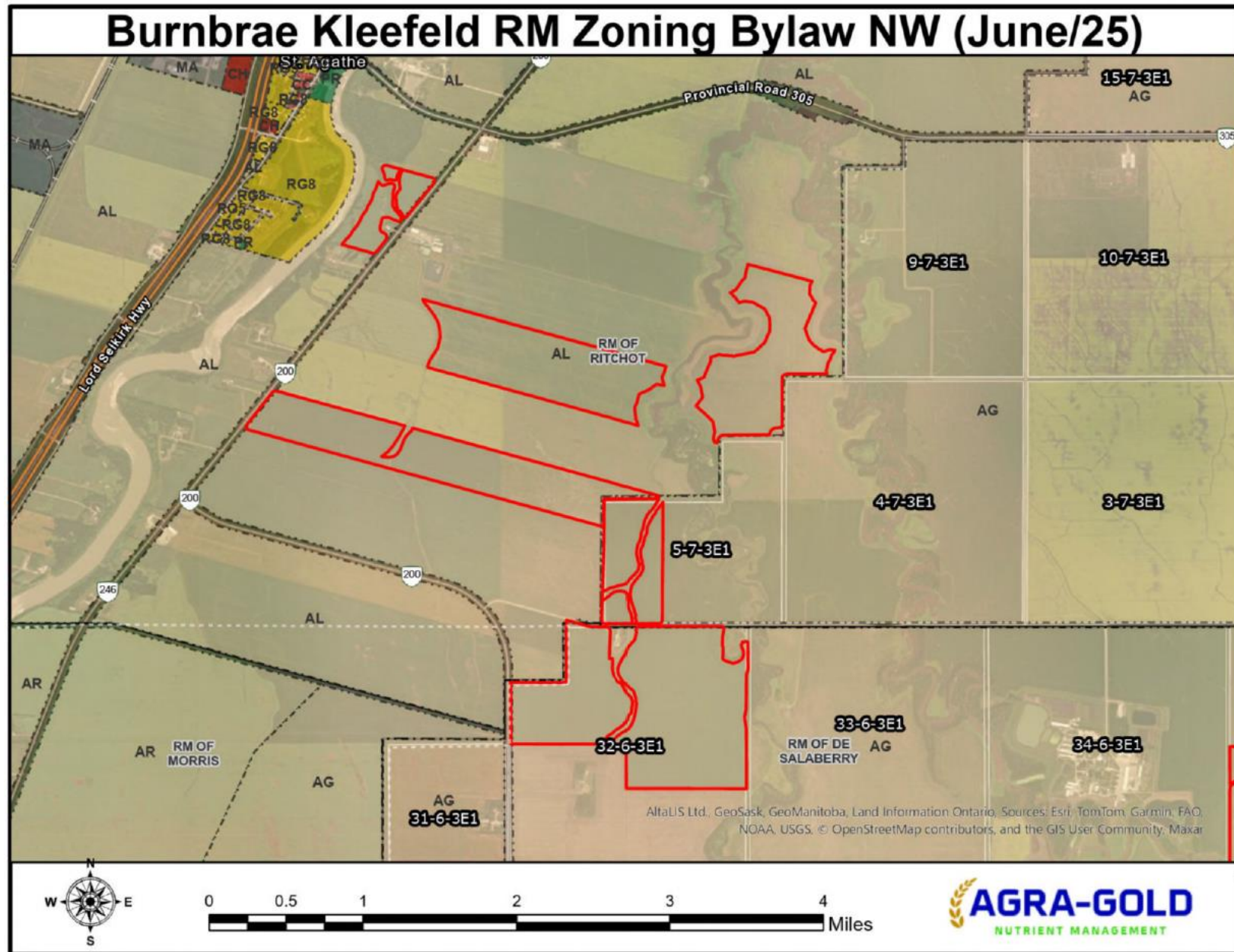


Zoning Bylaw Map (1)

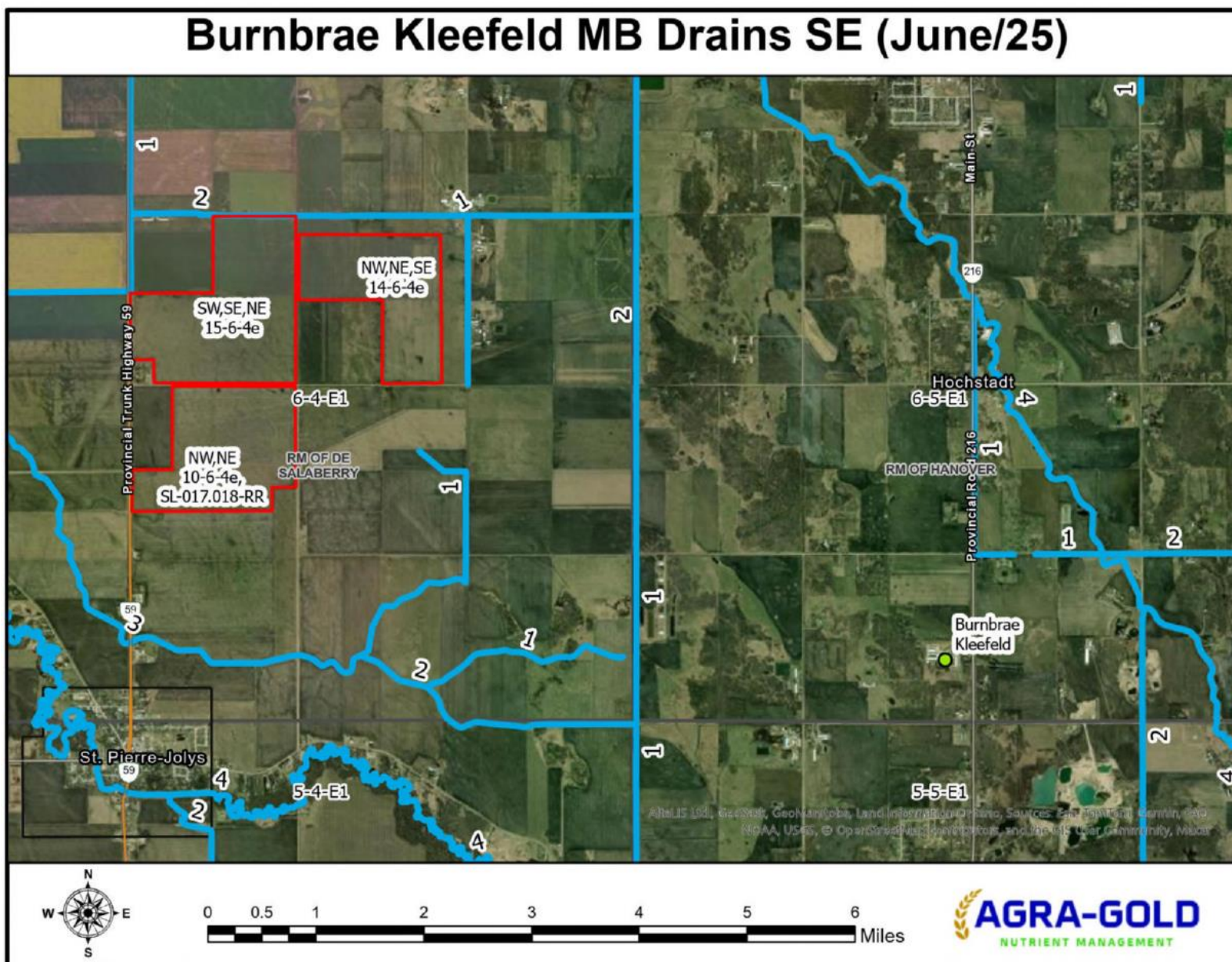
Burnbrae Kleefeld RM Zoning Bylaw SE (June/25)



Zoning Bylaw Map (2)

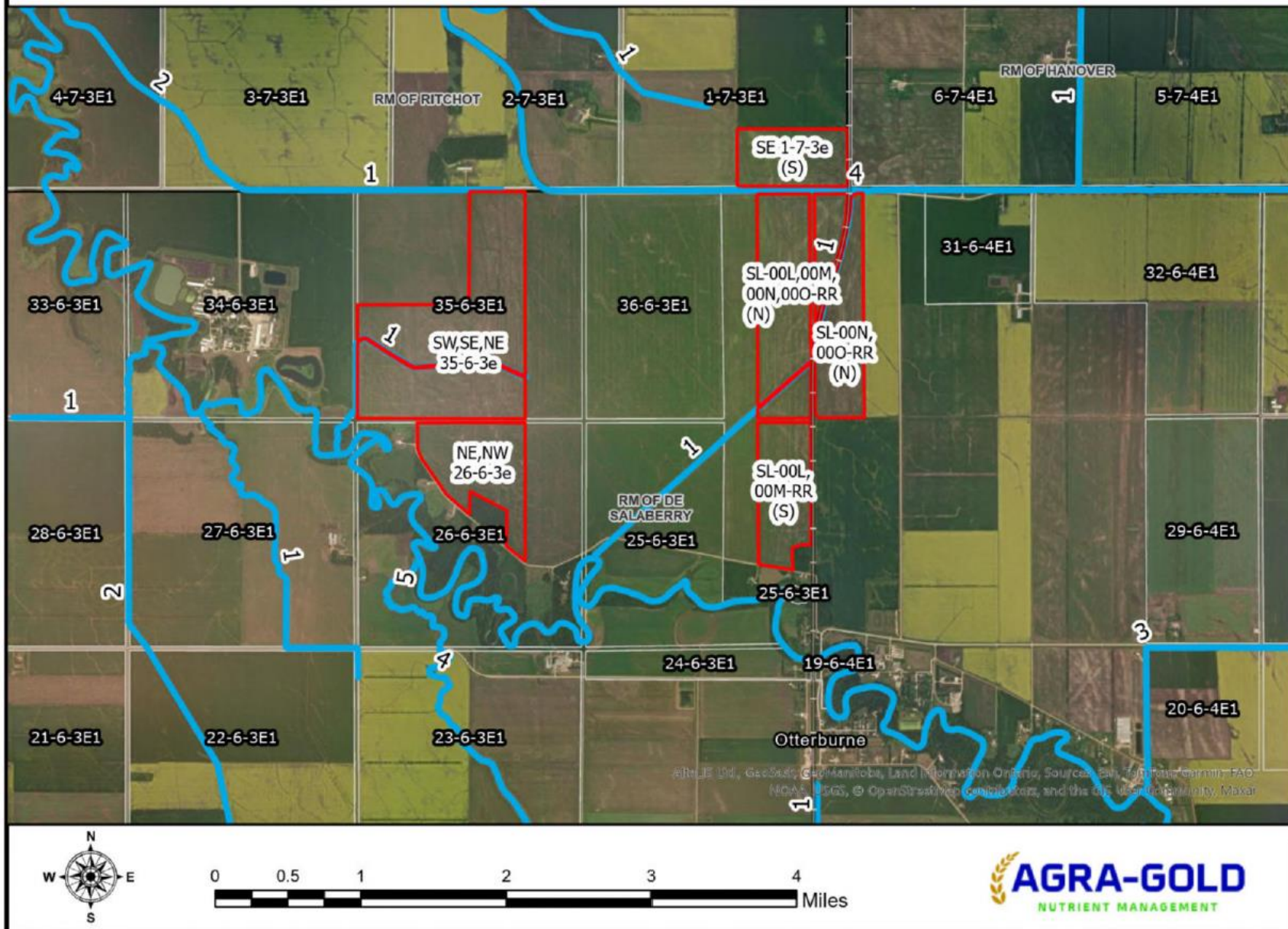


Zoning Bylaw Map (3)



Drains Map (1)

Burnbrae Kleefeld MB Drains Mid (June/25)



Drains Map (2)

Burnbrae Kleefeld MB Drains NW (June/25)

Provincial Road 305

Lord Selkirk Hwy

200

246

RM OF MORRIS

RM OF RITCHOT

RM OF DE SALABERRY

RL-556 to 562-AG (W)

RL-550 to 544-AG (Mid)

RL-552 to 562-AG (E)

RL-542, 544-AG (Mid)

SW 5-7-3e (E)

NW,NE,SE 32-6-3e

32-6-3E1

31-6-3E1

33-6-3E1

34-6-3E1

9-7-3E1

10-7-3E1

15-7-3E1

4-7-3E1

3-7-3E1

5-7-3E1

1

2

3

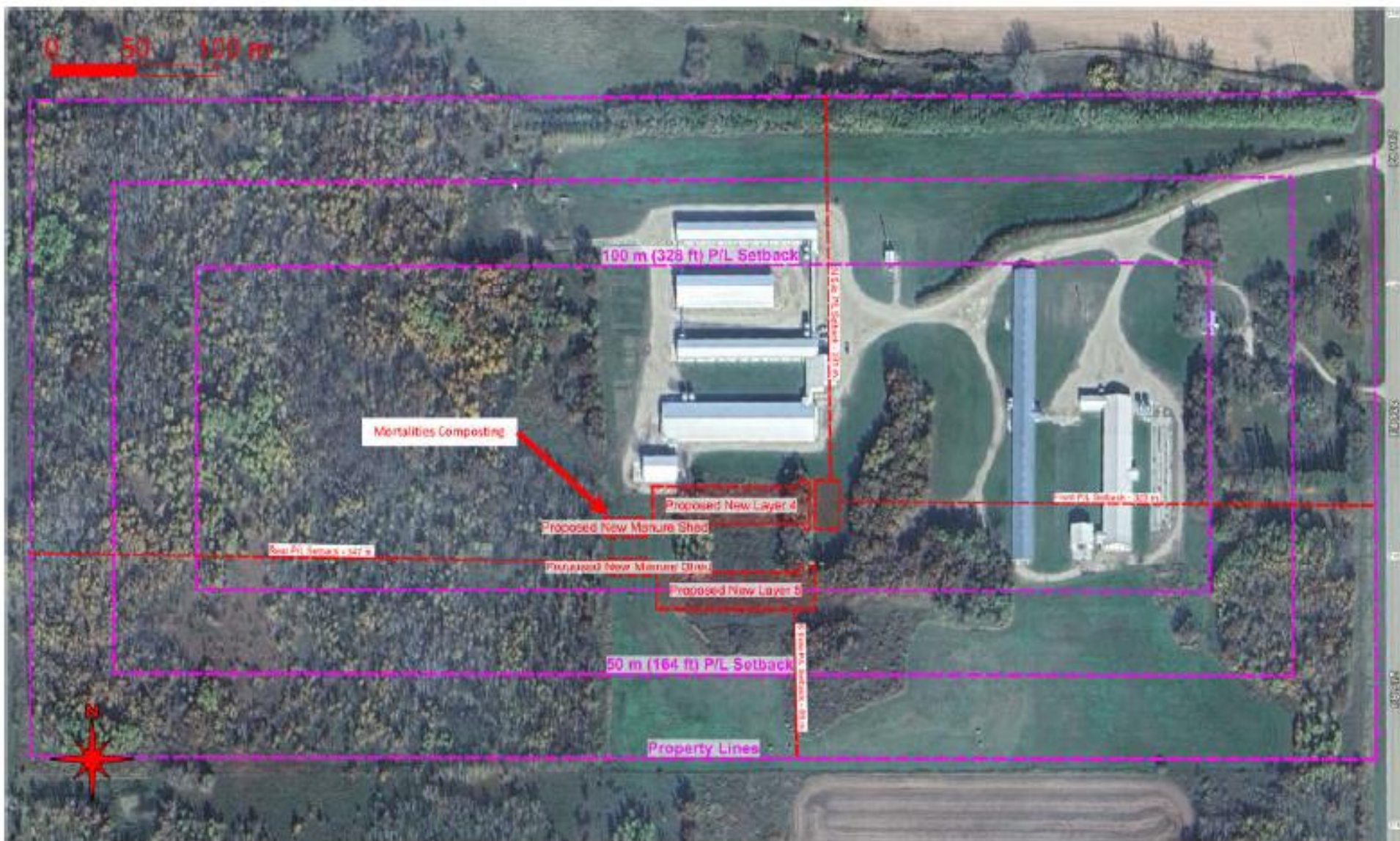
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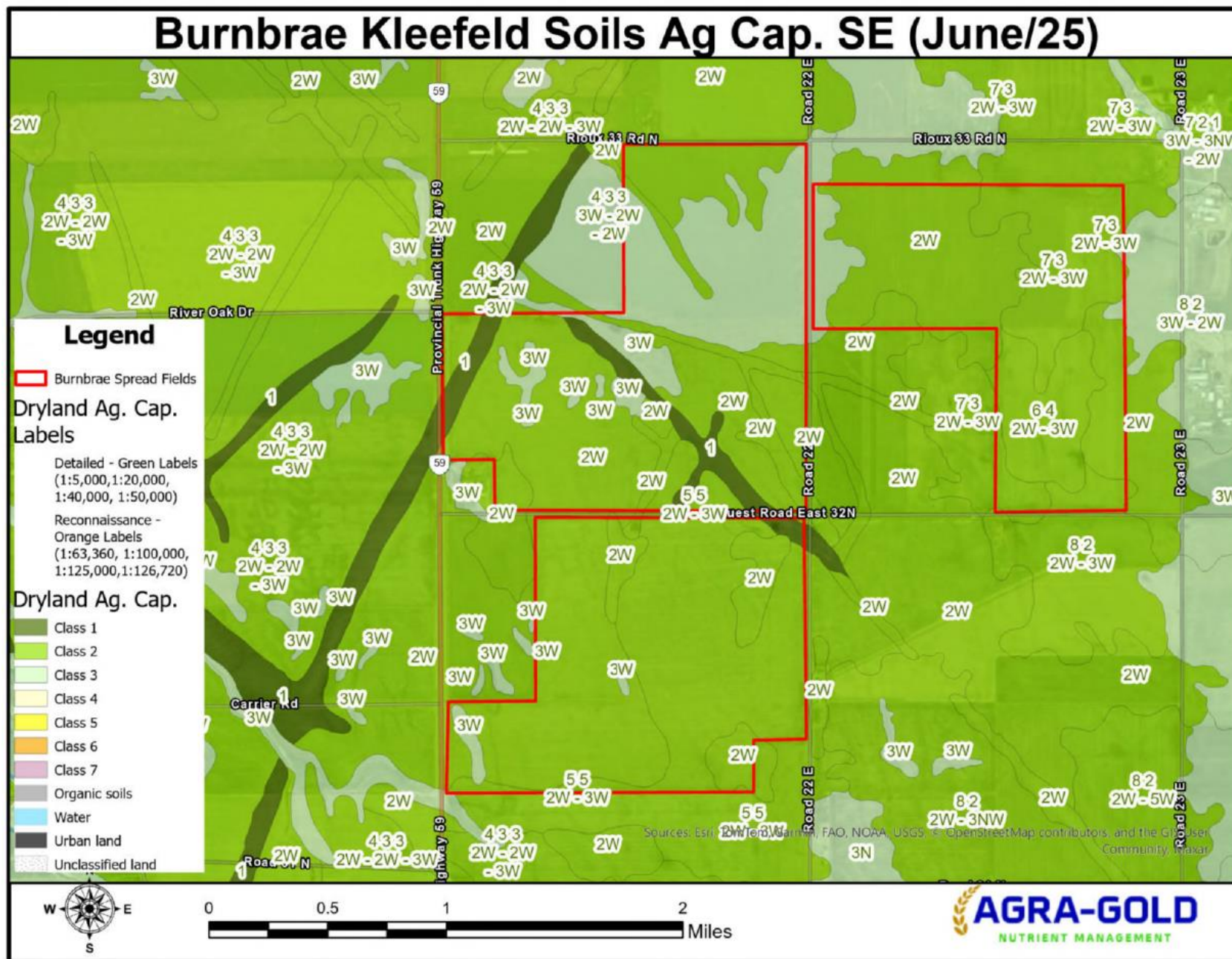
7

0 0.5 1 2 3 4 Miles

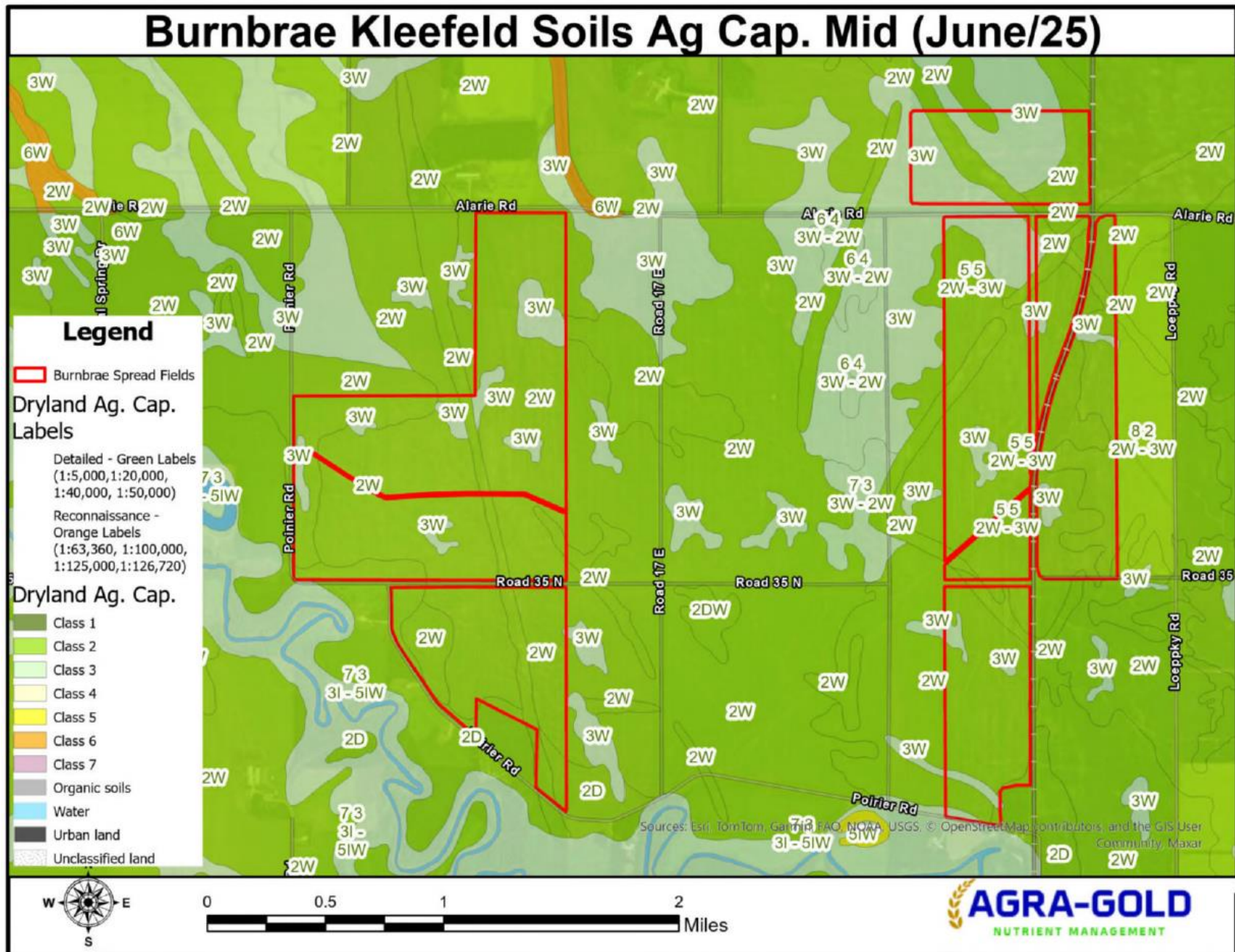
AGRA-GOLD
NUTRIENT MANAGEMENT

BURNBRAE FARMCO19 INC (TRC 12-117)



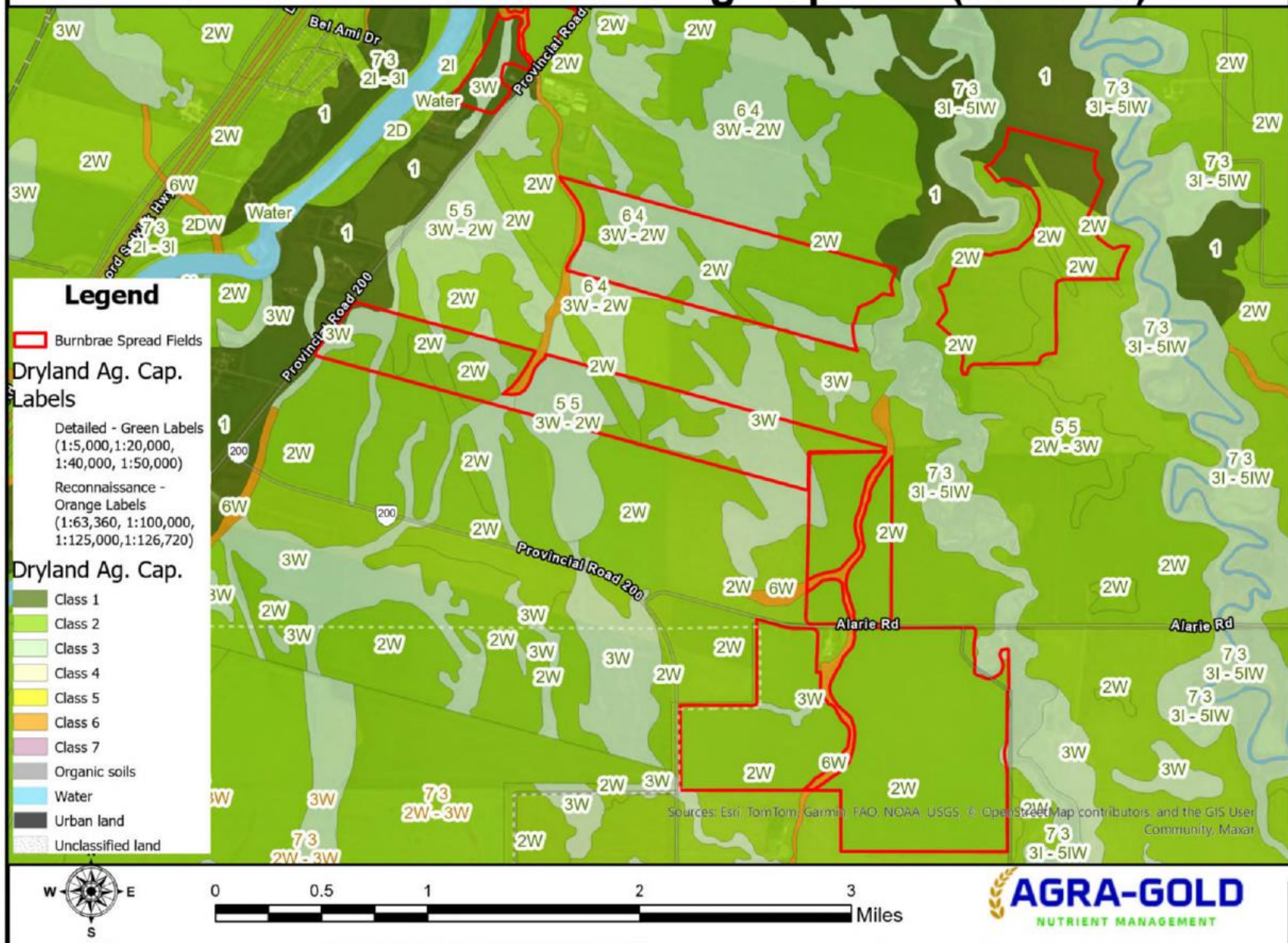


Soils Agricultural Capability (1)

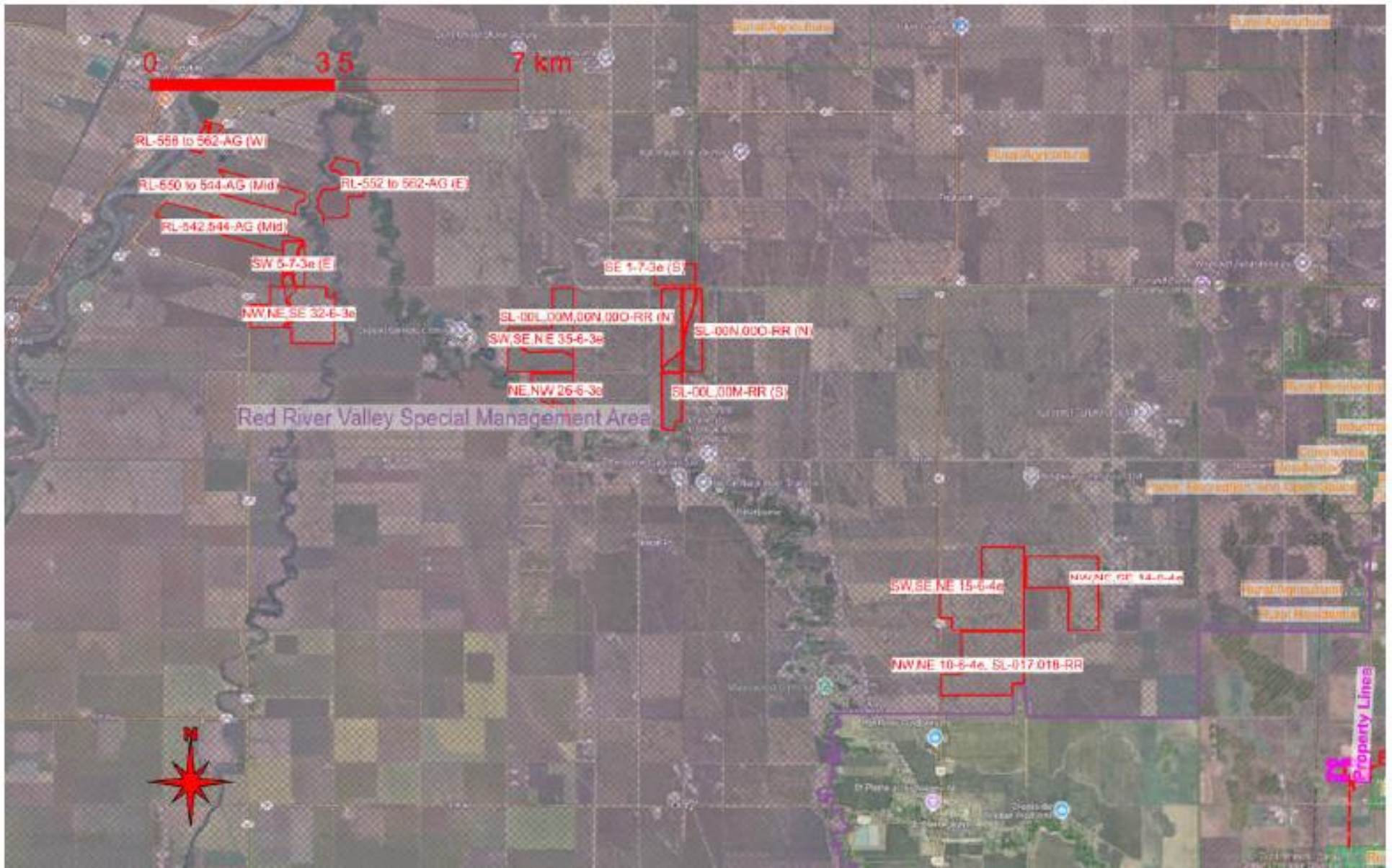


Soils Agricultural Capability (2)

Burnbrae Kleefeld Soils Ag Cap. NW (June/25)



Soils Agricultural Capability (3)



Manure Fields within the Red River Valley Special Management Area

C. SITE ASSESSMENT OVERVIEW

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
1	Description of Operation and Nature of Project	The Planning Act requires that that an application to approve a conditional use for a livestock operation involving 300 or more animal units must be referred to the Livestock Technical Review Committee (TRC) for review. The RM of Hanover Development Plan By-law No. 2417-18 states that expanding livestock operations 400 animal units or greater in size located in the Agriculture 2 Policy Area shall be listed as a conditional use in the Zoning By-law and will require a technical review. Burnbrae FarmCo19 Inc.'s application is for an expanding poultry operation (consisting of laying hens and pullets) of more than 400 animal units. As such, it has been referred to the TRC for review. The Technical Review Committee Regulation 119/2011 requires an applicant to submit a completed site assessment. The TRC has received and accepted for review a complete site assessment from Burnbrae FarmCo19 Inc., including all information necessary to review the application.	MNR
2	Type and Size of Operation	Burnbrae FarmCo19 Inc is seeking Conditional Use approval from the RM of Hanover to expand their layer operation by increasing the laying hens from 90,000 to 200,000 and the pullets from 37,500 to 42,000. The total Animal Units (AU) will increase from 871 to 1799 AU.	AGR
3	Animal Confinement Facilities	Two new layer barns are proposed, 21,700 square feet each. There are three existing layer barns and one existing pullet grower barn that will remain unchanged.	MNR
4	Confined Livestock Areas	The proposed facility is not considered a Confined Livestock Area and is not regulated under the Livestock Manure and Mortalities Management Regulation	ECC
5	Project Sites Unsuitable for Development	The proposed manure storage is not located within Nutrient Management Zone N4 or any Nutrient Buffer Zone	ECC
6	Water Source: Well Water Requirements of 14,278 imperial gallons per day	Based on the water consumption information provided, this proponent is required to apply for a Water Use Rights Licence under The Water Rights Act. An application can be submitted via our online portal – https://web22.gov.mb.ca/Sso/Account/LogOn	ECC

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
7	Development Plan	The Planning Act requires that development plans include a livestock operation policy that guides zoning by-laws dealing with livestock operations. The Planning Act requires that municipalities issue a development permit before any development takes place on a site. All development must comply with the Zoning By-law and Development Plan. Any proposed development that does not comply with required separation distances or setbacks must obtain Council approval following public hearing to vary those requirements. The RM of Hanover Development Plan states that preference will be given to the expansion of existing livestock operations over the establishment of new livestock operations (3.1.5.6). New livestock operations shall not be permitted within the Agriculture 2 Policy Areas, however, the expansion of legally existing livestock operations may be considered based on the provisions of the Zoning By-law (3.1.5.7). The development plan states that when considering approval of new or expanding livestock operations Council or the Designated Employee or Officer will consider the following (3.1.5.10): • The type and size of the operation; • The comments of the Technical Review Committee report, when required; • The stated concerns of local residents or neighbouring property owners; • Compliance with Provincial guidelines and the provisions of the Development Plan and Zoning By-law; • The available land base, phosphorous budget, and proximity to environmentally sensitive areas; • The past performance record of the livestock operation (for expansion applications); • The Manure Management Plan in accordance with Provincial standards and guidelines; • The size and location of manure storage systems and manure application sites; • The potential impacts generated by the livestock operation on the Provincial highway and municipal road systems; • The context of the general area and neighbouring land uses; and • The water usage requirements and proximity to municipal water supply wells. Designation The site of the proposed livestock operation, located in the SE ¼ 5-6-5 EPM in the RM of Hanover, is designated Agriculture 2 Policy Area (Development Plan By-law No. 2417-18). The proposal complies with Development Policies 3.1.5 Policies – Livestock. Within areas designated Agriculture 2 Policy Area, expanding livestock operations 400 AU or greater in size shall be listed as a conditional use in the Zoning By-Law and requires a technical review.	MNR

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
8	Zoning By-Law	Zoning The site of the proposed operation is zoned “AL” Agriculture Limited (Zoning By-law No. 2418-18) with a minimum site area requirement of 80 acres and a minimum site width requirement of 600 feet. The proposed operation complies with the minimum site area and width requirements of the Zoning By-law.	
9	Separation Distances	The proposed expansion from 871 AU to 1,790 AU increases the required minimum separation distances from livestock operations to single residences and designated areas in the development plan. The minimum separation distances listed for 1,601 – 3,200 animal unit livestock operations, shown in Table 4-3 of the RM of Hanover Zoning By-Law, are required. The expanded operation consists of animal confinement facilities and non-earthen manure storage facilities. Therefore, the following minimum separation distances are required: • 350 m (1,148 ft) from single residence to animal confinement facility and non-earthen manure storage facility. • 2,130 m (6,135 ft) from designated residential area in the development plan to animal confinement facility and non-earthen manure storage facility. The proposed barns are located 1,535 ft to the nearest single residence located within SW ¼ 4-6-5 EPM (legally described as Parcel A, Plan 47144) and located 4,201 ft to the nearest designated area in the development plan (rural residential policy area located directly south within SW ¼ 32-5-5 EPM). A variance order will be required to vary the minimum separation distance from the proposed barns to the nearest designated area in a development plan (rural residential policy area located directly south within SW ¼ 32-5-5 EPM) from 6,135 ft to 4,201 ft.	MNR
10	Wells	The proposal states that the water for the proposed livestock operation will be sourced from existing wells. It also notes the presence of abandoned wells on the project site; however, it does not include a plan for their decommissioning. These abandoned wells should be properly sealed, and a sealed well report must be submitted to Manitoba Environment and Climate Change, Groundwater Management Section. For information on well sealing and submission of reports, contact Manitoba Environment and Climate Change at (204) 945-6959 or: https://www.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. The provincial wells database indicates the presence of wells near the center of Section 1-7-3W and 14-6-4E. As the exact quarter section is not specified in the database, the proponent is expected to make a reasonable effort to determine whether these wells are located within the proposed spread field. If confirmed that no well is located on the land identified for spreading, no further action is required. Under the Livestock Manure and Mortalities Management Regulation (LMMMR), a minimum 20-metre setback from any well, spring or sinkhole must be maintained during manure spreading, or 15-metre if a permanent vegetative buffer is in place.	ECC

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
11	Water Control Works	There is a concern the location of the “new proposed layer” 4 & 5 may be within the boundary of a prescribed wetland as defined by The Water Rights Act. Any impact or alteration to a prescribed wetland is regulated by The Water Rights Act, this includes draining, filling, or any other thing or activity that constitutes the loss of wetland benefits. It is recommended that a wetland assessment be conducted for the entire property to ensure that no wetland benefits are being lost by this proposed project.	ECC
12	Manure Type and Storage: Solid/ solid manure storage facility	The applicant will build a new manure storage. Under the Livestock Manure and Mortalities Management Regulation, the applicant must obtain a permit from Environment and Climate Change prior to building the storage. Once in operation the applicant must: • Ensure there is sufficient capacity to store all manure through the winter. • Maintain the structural integrity of the storage. • Operate the storage so that it does not pollute surface water, ground water or soil.	ECC
13	Mortalities disposal methods identified: Composting	The applicant will compost mortalities. Under the Livestock Manure and Mortalities Management Regulation, the applicant must: • Ensure the composting does not pollute surface water, groundwater, or soil. • Locate the composting site at least 100 m from any surface watercourse, well, or the operation's boundaries. • Ensure the composting facilities and process are acceptable to the director. Under the Livestock Manure and Mortalities Management Regulation, the disposal of mortalities exceeding the operation's routine capacity, including End of Lay cull events must: • Report to an Environment Officer without delay, and • Submit a plan for disposal for approval and receive authorization to dispose of end-of-lay hens.	ECC
14	Setback Distances from Manure, Livestock, and Mortalities to Water and Operation Boundaries	The applicant has indicated that all setback distances meet minimum requirements set out in the Livestock Manure and Mortalities Management Regulation.	ECC
15	Building in Designated Flood Areas	The farm property is not within a Designated Flood Area. Tourond Creek is adjacent to several of the spread fields and runs along the trucking route in some locations. Any activities which have the potential to impact this provincial water infrastructure (PWI) will require a PWI permit. This permit must be obtained prior to undertaking any activities which have the ability to impact the PWI.	MTI

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
16	Odour control measures (project site)	Burnbrae FarmCo19 Inc has indicated that the manure will be contained in a covered, solid manure storage facility (building). 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.	AGR
		No new shelterbelt is proposed.	MNR
17	Land Available for Manure Application	The estimated land requirement for Burnbrae FarmCo19 Inc is 2,153 acres for the phosphorus excreted by all of the birds, or 1,348 acres for the nitrogen, whichever is higher. Burnbrae FarmCo19 Inc has satisfied the land requirement by demonstrating that they have access to 2,992 suitable acres. Additional details can be found in the appendix.	AGR
		The proponent's proposed spread fields are located within the Municipalities of De Salaberry and Ritchot. Spread field locations in De Salaberry are designated Agriculture 1 Policy Area and comply with the respective Livestock Policies. Spread field locations in Ritchot are designated Agricultural Policy Area and comply with the respective Livestock Policies, though, it should be noted that they are in some cases located adjacent to designated rural residential and Environmental policy areas. There are no policies that restrict manure field application as they relate to designated areas.	MNR
18	Setbacks for Manure Application	Under the Livestock Manure and Mortalities Management Regulation, manure spreading must meet setback distances to all surface watercourse and groundwater features.	ECC
19	Manure Transportation and Application	Please be advised that any structures placed within the controlled area of a Provincial Trunk Highway (PTH) or Provincial Road (PR) (125 ft from the edge of the right-of way) requires a permit from our office. For permit information, please email accessmgmt@gov.mb.ca or call 204-583-2433. Permit information can also be found at https://forms.gov.mb.ca/highway-permits-application/index.html. The placement of temporary drag lines or any other temporary machinery/ equipment for manure application within the right-of-way of any PTH or PR requires permission from Manitoba Transportation and Infrastructure's Steinbach Office. Please contact Robert Fender, Regional Planning Technologist, at (204) 346-6266 or Robert.Fender@gov.mb.ca. Please also notify the Regional Planning Technologist for the placement of temporary draglines or other temporary equipment for manure application within the controlled area of a PTH or PR (125 ft from the edge of the right-of-way).	MTI

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
		Under the Livestock Manure and Mortalities Management Regulation, the applicant must: - Operate with an annual manure management plan which includes: - Manure type, volume, and nutrient values - Spread field location and soil class - Soil tests showing nitrogen and phosphorus levels - Crops to be grown - Manure application rate - Ensure manure does not pollute groundwater, soil or escape the operation's boundaries. Follow requirements for the land application of manure, including nitrogen limits and phosphorus thresholds.	ECC
20	Manure Application on Lands Subject to Frequent Flooding or Inundation	The applicant has indicated that some spread fields are located within a regularly inundated area. Under the Livestock Manure and Mortalities Management Regulation, manure applied there between September 10 and November 10 must be injected or incorporated within 48 hours. This does not apply where perennial forages are established, or the soil is not disturbed except for seed planting or commercial fertilizer application and has adequate crop residue to control erosion.	ECC
21	Projected Truck Haul Routes and Access Points	The subject property has frontage along PR 216 with an existing access. We don't anticipate a significant increase in use of the existing access.	MTI
		The proposed site is accessed by PR 216. As per Section 116(2) of The Planning Act, 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.	MNR
22	Conservation Data Centre Report	<u>Provincial Requirements</u> Known rare species will not be impacted on new site/lands <u>Related Provincial Safeguards</u> The information 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 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.	NRIF

Provincial Departments: Agriculture (AGR); Environment and Climate Change (ECC); Transportation and Infrastructure (MTI); Municipal and Northern Relations (MNR); Natural Resources and Indigenous Futures (NRIF)

D. PUBLIC COMMENTS AND DISPOSITIONS

Public Comment Summary	
Victor Sawatzky	Concerns Concerns Regarding: The ownership of the operation by a corporation and the potential that this will make it hard for the local community to communicate with the operation about potential issues including smell, noise, and waste management.
Shannon Scott	Concerns Concerns Regarding: - The potential increase in odour and dust. - The potential impact on property values. - The health impacts of breathing the airborne matter from the operation.
Daniel Martel	Opposed Concerns Regarding: - Proximity to a nearby town. - Potential contamination of water and air.
Jeanne Martel	Opposed Concerns Regarding: - Proximity to a nearby town. - Potential contamination of water and air.

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. 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(2) of The Planning Act, at least 14 days before the date of the hearing, Council must:
 - a) send notice of the hearing to
 - i. the applicant,
 - ii. the Minister (c/o the Steinbach Community Planning Office),
 - iii. all adjacent planning districts and municipalities, and
 - iv. every owner of property located within three kilometres of the site of the proposed livestock operation, even if the property is located outside the boundaries of the planning district or municipality; and
 - b) publish the notice of hearing in one issue of a newspaper with a general circulation in the planning district or municipality or, when there is no newspaper with a general circulation in the area, post the notice in the office of the planning district or municipality and at least two other public places in the district or municipality; and
 - c) post a copy of the notice of hearing on the affected property in accordance with the Posting Requirements outlined in Section 170 of The Planning Act.
2. Council should specify the type(s) of operation, legal land location, number of animals in each livestock category, total animal units, and expiration date (as per Planning Act section 110(1)) in its Conditional Use Order.
3. As per Section 117 of The Planning Act, Council must send a copy of its Conditional Use Order to
 - a) the applicant,
 - b) the Minister (c/o the Steinbach Community Planning Office), and
 - c) every person who made representation at the hearing.
4. According to the RM of Hanover By-Law, the required minimum separation distance between the proposed barn and the nearest designated area in a development plan is approximately 6135 ft. As a result, Council will require the proponent to apply for a variance.
5. As per Section 169(4)(b) of The Planning Act, a copy of the notice of hearing to vary the separation distance involving a livestock operation must be sent to every owner of property located within the separation distance that is proposed to be varied.
6. As per Section 174(1) of The Planning Act, Council can hold all required hearings together in a single combined hearing. It is recommended that during the course of this public hearing, Council first deal with the conditional use order followed by the variance order.
7. As per Section 174(2) of The Planning Act the notice of hearing for each matter to be considered at a combined hearing may be combined into a single notice of hearing.

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

Recommended Actions to Proponent

1. That a variance be applied for prior to the Conditional Use Hearing to vary the separation distance between the designated area of the proposed barn and the nearest designated area in a development plan. This will provide council with the option of holding a combined Conditional Use and Variance Hearing.
2. That the proponent request the municipality hold a combined hearing.
3. That any additional measures identified through subsequent provincial licencing or permitting in order to minimize any identified risks to health, safety and the environment be undertaken.
4. That as per Section 118.2(2)(b), an applicant may appeal the following decisions of a board or council to the Municipal Board respecting an application for approval of a conditional use:
 - i. a decision to reject the application,
 - ii. a decision to impose conditions.

F. TECHNICAL REVIEW COMMITTEE MEMBERS

Name	Department	Title <i>Branch</i>	Contact
Holly Ervick-Knote	Municipal and Northern Relations	Senior Planner <i>Community Planning Services Branch</i>	204-945-1312 holly.ervick-knote@gov.mb.ca
Petra Loro	Agriculture	Livestock Environment Specialist <i>Sustainable Agriculture Branch</i>	204-918-0325 petra.loro@gov.mb.ca
Julie Froese	Environment and Climate Change	Environmental Livestock Coordinator <i>Environmental Approvals Branch</i>	204-945-7104 julie.froese@gov.mb.ca
Karin Newman	Natural Resources and Indigenous Futures	Habitat Mitigation Specialist <i>Wildlife Branch</i>	karin.newman@gov.mb.ca
Jeff DiNella	Transportation and Infrastructure	Senior Development Review Technologist <i>Highway Planning and Design Branch</i>	204-430-7176

Appendices

Appendix A

Manitoba Natural Resources and Indigenous Futures – Fisheries Branch

Fisheries Branch staff have reviewed the proposal and advise that if the proponent adheres to all mitigative measures prescribed by ECC to protect surface waters and riparian habitats, we have no additional concerns with the proposal as described.

Manitoba Natural Resources and Indigenous Futures – Lands and Planning Branch

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

Manitoba Agriculture – Sustainable Agriculture Branch

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

Typical, modern feeding practices for layers and pullets were used to estimate nutrient excretion by the poultry at Burnbrae FarmCo19 Inc. Realistic, long-term 10-year crop yields from the Manitoba Agricultural Services Corporation (MASC) for the RMs of Richot and De Salaberry were used to estimate crop nitrogen uptake and phosphorus removal rates for the crop rotation specified in the proposal.

Land suitability is determined using soil testing for phosphorus and soil survey to establish the agriculture capability. Soils must be below 60 ppm Olsen P to be considered suitable. Detailed soil survey is available in the area to determine the agriculture capability of the land. The soil survey indicates the land is predominantly Class 1-3, prime agricultural land. The most significant limitation in the area is wetness (W) with smaller areas of dense soils (D).

The estimated land requirement for Burnbrae FarmCo19 Inc is 2153 acres for the phosphorus excreted by all of the birds, or 1348 acres for the nitrogen, whichever is higher. Burnbrae FarmCo19 Inc has satisfied the land requirement by demonstrating that they have access to 2992 suitable acres.

Appendix B



October 8th, 2025

Environmental Livestock Coordinator Manitoba Environment and Climate Change Environmental Approvals Branch Transmitted by email: trc@gov.mb.ca

Dear Coordinator:

Re: Burnbrae FarmCo19 Inc., Response to Public Comments to Livestock TRC 12-117.

On behalf of Burnbrae FarmCo19 Inc., I am pleased to respond to public comments submitted by Viktor Sawatzky and Shannon Scott with respect to the livestock technical review committee and site assessment for expansion of its operations at SE-05-006-05E1.

Our family is respectful of the concerns raised by Viktor Sawatzky. We would like to reassure him that Burnbrae Farms is a family owned and operated business. As such, our family is dedicated to being a good neighbour, with attention paid to supporting the local community. Our family does not reside in the immediate area of its operation, but I would hope that Burnbrae Farms will be judged for our actions, not where we live. Our family is comprised of multi- generational egg farmers with many years of experience in managing modern egg production facilities. Our families have farms in many communities. We are looked upon as a good neighbour in each and every one of these communities.

Burnbrae Farms is also respectful of the concerns raised by Shannon Scott in regards to odours and emissions from its current and proposed operations, particularly the handling and management of poultry manure. As part of our proposal for expansion to 1799 animal units, Burnbrae Farms is committed to the construction of two new manure storage sheds. These structures are being designed to contain the emissions and odours from the stored manure. We are also committed to the addition of a new composting facility for processing mortalities with minimal impacts to the environment and neighbours.

Burnbrae Farms recognizes the value of the manure from its operations as a nutrient and organic matter resource to neighbouring farms. Burnbrae Farms is dedicated to working with Agra-Gold Nutrient Management Consultants in working in a responsible and sustainable manner with minimal adverse impacts to neighbours while realizing the full potential of this resource.

If you have any questions or need any further information, please contact the undersigned.
Respectfully submitted,

Burnbrae mCo19 Inc

per:

A handwritten signature in black ink, appearing to be "Viktor Sawatzky", is written over a horizontal line.

Ted Hudson,
Executive Vice President

cc: Parker Clow (pclow@burnbraefarms.com), Norm Braun (NormB@PenforConstruction.com),
Keith Duhaime (kduhaime@dghengineering.com)

