



Unit 15 – 1599 Dugald Road • Winnipeg, MB • R2J 0H3

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Canada Sheep & Lamb Farms Ltd. Technical Review – Response to Community Comments December 15, 2015

Preface:

Canada Sheep & Lamb Farms Ltd. (Canada Sheep & Lamb) propose to construct and operate a lamb finishing facility and abattoir on the property at SW28-3-8E. This site was carefully chosen to minimize disruption of the well-being and lifestyle of rural residents in the Rural Municipality of Stuartburn. The proposal includes many engineering design features aimed at protecting the environment and minimizing odours. These measures including roofs over pen areas and solid concrete floors to prevent any manure constituents from infiltrating into the soil as well as to improve housing conditions for the animals. Out of concern both, for the environment, and the well being of the lambs and employees, and to the benefit of land owners who have accepted to receive the manure from the operation at no cost, Canada Sheep & Lamb propose to compost all of the lamb manure. This will result in a manure product that is nearly odourless, and that is a very stable source of organic fertilizer known to have little impact on water resources.

Canada Sheep & Lamb firstly met nearly all rural residents in the immediate neighbourhood of the proposed site individually, as most of these residents owned some land that was perceived as suited for land application of composted manure. The response at that time was very favourable to the proposal and many landowners willingly provided manure spreading agreements for the arable acres they possessed. Canada Sheep & Land then accepted the gracious invitation of Mrs. Greaves to participate in an information session with other members of the community that she had so effectively arranged in an effort to get a better understanding and more information regarding the proposal. From this interaction, Canada Sheep & Lamb invited all neighbours to visit their Sarto property in order to be able to experience an operating facility and the associated impacts. All of those who attended commented that about the low noise and smell levels.

For all the land that has been acquired and leased, with the exception of land zoned limited development or Crown Lands, Canada Sheep & Lamb intend to clear all acreages that are suited for crop production, with the exclusion of Soil Agricultural Capability soils of Class 6, 7 or Organic. As a condition of the spreading agreements with other land owners, clearing costs of the land will be entirely born by Canada Sheep and Lamb.



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Canada Sheep & Lamb's proposal is not just about the building of a lamb finishing facility, it is also about investing into the community of Stuartburn and surrounding area. The finishing facility manager is a RM resident, and lives on the same section of land as Mr. & Mrs. Berg. The finishing facility and abattoir will create approximately 55 full time jobs in addition to seasonal work during the growing season for crop production and harvesting. With the creation of additional jobs in the area and increased need for arable acres in close proximity to the operation, it is anticipated that property values will in fact increase over time simply through increased demand.

Whereas it is difficult to deny that the immediate neighbours such as the Berg and Greaves families will notice that a new livestock facility is in operation, Canada Sheep & Lamb will make considerable effort to minimize the impacts of the proposal on them by maintaining a mature treed shelter belt around the site, and designing and landscaping of the abattoir in a manner which is attractive and complimentary of the area.

The involvement of the Canadian Food Inspection Agency (CFIA) in the abattoir design and operation, dictates that cleanliness requirements and plant operation both internal and external to the building are such that food products are protected. In addition to cleaning and disinfection, this also encompasses such items as dust control and site grooming. Accessibility of the site for the transfer of live and processed meat products is critical to the long term viability of this proposal and is of high importance to Canada Sheep & Lamb. In instances where the municipality is unable to care for and maintain the roadways in a suitable condition, Canada Sheep & Lamb after consulting with the municipality, will apply their resources to improve and maintain the access to the site at all times throughout the year.

Similar to the manner in which the CFIA regulates the operation of the abattoir, Manitoba Conservation & Water Stewardship regulates the livestock production and manure management aspects of the finishing facility in order to achieve environmental protection. The requirement for completion and filing of an annual manure management plan and source water testing and reporting for groundwater resources used within the facility are an example of regulatory requirements in place to ensure that the environment is protected. In addition to regulatory monitoring, Manitoba Conservation & Water Stewardship also have the ability to enact enforcement action should the situation warrant. Under such a situation, it falls upon the operation to take the necessary corrective measures and incur the costs to attain compliance.



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Response to Concerns Expressed by Neighbours:

J&L Berg - NW28-3-8E

Mr. Berg had his listed property listed for sale at the time Canada Sheep & Lamb first considered SW28-3-8E for construction of the proposed development. Canada Sheep & Land offered Mr. Berg what they believed was a fair price to purchase the land based on the property's assessed value, but were declined. Canada Sheep & Land did not counter offer, as higher offers for the land would ultimately impact the assessed value of other properties in the area, and eventually raise the property taxes for everyone. Mr. Berg committed his adjacent property at NW28-3-8E to Canada Sheep & Lamb for spread acres indicating he was eager to receive the composted manure. During this entire exchange Canada Sheep & Lamb had explained to Mr. Berg exactly what the development entailed and the long term plans.

Of all neighbours, Mr. and Mrs. Berg are likely to be those most impacted by Canada Sheep & Lamb's proposal in terms of odours and noise levels, owing to the close proximity to their residence and location immediately northwest of the finishing facilities. With regard to his concerns for surface water pollution, Canada Sheep & Lamb's proposal proposes drastic steps to separate manure from rain water, by building a roof over the entire pen area. Moreover, groundwater beneath the pens will be protected via a concrete floor for the pens. No other finishing facility in Manitoba features such extensive surface and ground water protection measures. All manure will be composted, which is another measure that will significantly reduce odours, minimize flies at the site, and results in a fertilizer that is stable and unlikely to leach nutrient into the sandy soils which are prevalent in the immediate area.

Manure from the facility will be transported away from the production site to adjacent parcels of land designated to receive manure. As a solid product this manure and bedding will be hauled by truck and stored in a windrow which after a period of storage will be turned and mixed to achieve the desired composting action. Sufficient manure equivalent to the amount that the parcel of land can receive as organic fertilizer will be all that is stored and processed on a particular site. Additional sites will be utilized to disperse the manure in the appropriate proportions as determine from soil testing and cropping intentions under the requirements of a manure management plan. Soil testing will be conducted as a means of monitoring nutrient levels in the soils and limiting them such that impacts to groundwater do not occur. Storage of manure in the same location will not occur in subsequent years as it is expected that a single parcel of land will only receive manure every third or fourth year.



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The cemetery located in close proximity to the site exists on land owned by Canada Sheep & Lamb. Discussion have been had with the cemetery committee and municipality in this respect and it has been mutually agreed upon that access and use of the property will be sustained as currently existing and that Canada Sheep & Lamb will respectfully honor the use of the property and its visitors.

J. Greaves – W16-3-8E & SE29-3-8E

These parcels of land are now removed from the application. For the record, after consultation with MAFRI crops and soils specialists, Canada Sheep & Lamb's business plan included the clearing of all land suitable for spreading, at their costs. It is unfortunate that this detail was either not conveyed, or was forgotten in the discussions with the owners of these lands.

Residence mistaken as a Cabin: the application does not list the existence of a cabin, nor does it appear as a cabin on the site plans. The information on residence locations was taken from aerial photographs dated as June 18, 2013.

Small business: the information from Mrs Greaves indicates that the property on SE29-3-8E is in fact a small business; TRC members reviewing the land designation and properties did point out that two subdivisions were missed, along with a mobile home that was the object of a development permit application in 2014 that did not appear on the 2013 aerial photographs; these were added to the application. However, there was no indication that a new residence was permitted on SE29-3-8E.

1) Air quality: the design of this finishing facility is above and beyond that of any other feedlot in use in Manitoba. The finishing facility design includes a roof over all pens areas, and pens feature a concrete floor. Whereas it is obvious that the operation of the finishing facility will generate some odours and perhaps dust, the wind rose for the site suggests that predominant winds are generally from the NNW and the NW, otherwise winds would generally come from the SSE, S and SE; only north winds, occurring about 10% of the time, would carry odours to residences on W16-3-8E. In spite of the closer proximity, the small business on SE29-3-8E would be impacted by odours even less often, as winds are from due E or EEN are less than 5% of the time over the year. This pattern generally applies to all seasons. Wind roses are the best meteorological data available to evaluate by frequency of occurrence of malodours, if any, from any livestock operation.



2) Water table: Southeast Manitoba is renowned for its plentiful groundwater reserves. The water use at this livestock operation is substantially less than for some other operations, like medium sized dairy or hog operations. Based on the projected usage by the operation (> 5600 igpd) a Water Rights License will be required and subsequently obtained. With regards to the impact on the water table, a hydrological study will be conducted to determine the impacts as part of the licensing process. The hydrogeology in this area of the southeast is such that groundwater wells extracting water below 100' often yield pumping rates between 30 and 60 imperial gallons/minutes; the drinking water requirements as well as water for the abattoir and employee's quarters will be substantially less than such high water yield capacity for wells.

3) Noise pollution and pests: It is not expected that noise levels will be any greater than those for other types of livestock operations; given the size of the livestock, entering and exiting the facility the noise from the livestock is expected to be significantly less than for a cattle feedlot, for example. Other noises, during daytime, will result from farm equipment use, and will not exceed normal levels for such equipment. The concern about flies is legitimate. Livestock operations are favourable to the reproduction of common flies. However, since there has been a dairy operation situated just north of the site, the presence of common flies should not be a new occurrence in the area. Canada Sheep & Lamb will control flies on the livestock, and flies control measure can be implemented for the manure compost piles, if required. It should be noted that proper composting of organic material such as lamb manure generates sufficient temperatures into the piles, which are regularly turned, to kill flies and larvae. Owing to sanitary impetus, flies will be controlled in the vicinity of the abattoir.

4) Rare species – Orchids: as indicated, we have contacted the Manitoba Conservation Data Centre to inquire about rare species that could be impacted. While the Data Centre did not have any specific record for this site, we recognize that some sensitive fauna or flora could exist at the site. Mrs. Greaves is invited to contact Manitoba Conservation Data Centre and report the existence of orchids in the area, and disclose their location. If these orchids are in fact part of the native flora of Manitoba, efforts will be made to either protect their immediate habitat, or else attempt to relocate the established stand, if possible.

5) Mass mortality plan: while it is premature to invest capital for consultants to develop a mass mortality management plan, at the project application stage for consideration as a conditional use, Canada Sheep & Lamb is committed to drafting such a plan once the conditional use of the property is granted, as indicated in the proposal. The proposal cites rendering, hauling to a Manitoba Conservation and Water Stewardship approved landfill and large scale composting as viable alternatives for this purpose. The management of mass mortalities is regulated under the *Livestock Manure and Mortalities Management Regulation 42/98*, and Canada Sheep & Lamb intends to report any such mass mortality and to cooperate with Manitoba Conservation and



Water Stewardship to dispose of any deceased animals in a pre-approved, environmentally sound manner.

6) Road degradation: road repairs are under the jurisdiction of the RM. With the understanding that slaughter will be carried out on-site, the only livestock hauling traffic will be for the 35 kg lambs trucked to the facility for finishing and processed meat leaving the facility in various size trucks depending on the end user of the product. While some feed trucks will inevitably use Franko Road, this will not be a daily traffic and all measures will be taken to avoid damaging Franko Road, for the mutual benefit of Canada Sheep & Lamb, who needs access to PTH 12, and residents alike. Where applicable, road restrictions will be observed. This new operation will be the source of increased tax revenues for the RM, and Canada Sheep & Lamb is hoping that some of these additional tax revenues will be devoted to maintaining Franko Road for everyone's benefits.

7) Cemetery: Canada Sheep & Lamb is most respectful of Manitoba residents who have passed away. There will be no composted manure applied within 10 m of any marked resident burial site or marked cemetery. Sheep manure does not carry as much odours as some of the more pungent manures; moreover, all lamb manure will be composted, which will further reduce any remaining odour as composted manure will be land applied. Mrs Greaves does not indicate the location of her family's cemetery; assuming that it is on SW16-3-8E, odours and noise from the feedlot situated to the south will be greatly attenuated and infrequent, for the same reasons as explained above.

8) New residence relocated on SW29-3-8E: if required by the TRC panel, Canada Sheep & Lamb will arrange for an exact measurement of distance between the new residence recently moved to the site, and the proposed west edge of the feedlot.

9) Concerns about exceeding conditional use animal units size: while it is undeniable that Mr. Smith had made a mistake in undertaking an unapproved expansion of his facilities in the RM of Hanover, it is also clear that the RM exercised its powers and imposed a large fine to Mr. Smith and Canada Sheep & Lamb. In the process of remediating this mistake, Canada Sheep & Lamb has learned considerably and this knowledge has been included into this proposal.



L. Shologin – SW33-3-8E (NW top corner)

1) Waste storage: The lamb manure will be composted after removal from the pens, and only non-odorous composted manure will be field applied. Typically, the composted manure would be field stored only in the quantity required for that particular field, and only when immediate land application is not practical (e.g. during winter months).

2) Well capacity: Again, southeast Manitoba is renowned for its plentiful groundwater reserves. The water use at this livestock operation is substantially less than for some other operations, like medium sized dairy or hog operations. The hydrogeology in the general area is such that groundwater wells extracting water below 100' often yield pumping rates between 30 and 60 imperial gallons/minutes.

3) Surface water contamination: while it is true that occasionally the southeast experiences heavy rains, the coarse (sandy) nature of the soils in the area allows for rapid infiltration, which helps, along with the ditch network, to drain excess surface water away from land. As far as pollution risks, the finishing facility design includes a roof over all pens areas, and pens feature a concrete floor; all efforts are made to separate rain water from manure in this design, as soggy pen situations is detrimental to the health and growth of small lambs. Very little risk of surface water pollution exist in association with this proposal. As far as contamination of surface wells, shallow wells are more likely to be polluted by residential septic fields or ejector systems, as contaminants are deposited continually in the immediate vicinity of residential wells.

4) Liquid waste: the feedlot will not produce any liquid waste – manure is managed in the solid form only.

5) Composting: composting is a biological process wherein the growth of aerobic bacteria is facilitated by frequent compost windrow turning to aerate the piles. These bacteria consume the organic matter in the livestock manure, and tie the nutrients into more stable organic matter. After composting is finished, the entire pile is ready for land application, or field storage during winter months. All bacteria and organic matter is therefore removed from the site and spread in accordance with a manure management plan as per the *Livestock Manure and Mortalities Management Regulation* MR42/98.

6) Phosphorus levels in fields: all fields listed in the Manure Application Field Characteristics Table had to be soil tested in order to determine the existing levels of phosphorus and nitrogen. Only fields with less than 60 ppm of phosphorus can be used for land application of livestock manure. All fields identified for composted manure application will provide greater crop yields as a result of composted manure application as crop needs exceed the levels of phosphorus and



nitrogen currently available in these fields. Many fields are very deficient in phosphorus and nitrogen.

7) Odours: Both separation distance and the presence of trees is known to attenuate the intensity of livestock odours, but this effect is difficult to measure and highly depends on each livestock and residential situations. Malodours are largely resulting from manure having excessive moisture content, as it results from the anaerobic bacteria (which thrive in low oxygen situations) that would develop when manure is wet, as is typically the case with liquid manure. Odour production from the pens will be kept to a minimum as the roof over the pens will avoid situation of soggy manure. Similarly, as the manure is removed from the pens it will be composted, an aerobic process. Odour generation from this aspect of manure management will be minimized both at the site as well as during land application. It should be noted that composted sheep manure remains a very popular fertilizer source for gardeners, and is available for purchase at Walmart, RONA, Peavy Mart, and most garden centres in Winnipeg and elsewhere across Canada. Nevertheless, there will be some odours produced from the lambs, however not nearly to the same intensity as similarly sized hog or dairy operations utilizing liquid manure handling systems. The windrose at the site suggest Mr. Shologin's residence, situated at the northwest corner of SW33-3-8E, may be inconvenienced by some odours from the finishing facility located slightly over 1 mile south when winds are from the south, that is approximately 15% of the time. While it remains difficult to quantify the odour level that could be reaching Mr. Shologin's house, it should be less than odours coming from dairy, cattle or hog operations of the same size, as these all feature anaerobic manure situations or liquid manure management systems.

8) Road traffic: Since slaughter of grown lambs will be carried out on-site, the only livestock hauling traffic will be for the feeder lambs trucked to the finishing facilities and processed meat products. Highway trucks and trailers are expected to be used for the transport of young stock and processed meat product shipments. While some feed trucks will inevitably use Franko Road, this will not be a daily traffic. This new operation will be the source of increased tax revenues for the RM, and Canada Sheep & Lamb is hoping that some of these additional tax revenues will be devoted to maintaining Franko Road to allow for continuous use by Canada Sheep & Lamb and its neighbours. Should this not be sufficient, Canada Sheep and Lamb will commit their own resources to maintaining and improving the roadway system.

9) Impact on taxes: Appreciation of land value as a result of the emergence of a sizeable livestock operation occurs when the operation's business plan includes the acquisition of a large land base for its operation. In this case, Canada Sheep & Land is instead offering a supply of one of the best compost materials available to neighbouring livestock farmers. Many farmers have recognized the opportunity and were pleased to engage in a mutual agreement with Canada Sheep & Lamb to accept the composted manure to fertilize prairies and pastures, and improve some of their land to annual crops. Consequently, property taxes should be directly affected; the



added tax base resulting from the appraisal of Canada Sheep & Lamb's facilities may even provide the RM with the capacity to freeze the tax roll for some years.

10) Spreading acres: the proposal is listing all land that was inventoried either as owned, lease, or subject to a spreading agreement. The *Livestock Manure and Mortalities Management Regulation* MR42/98 requires that operations with more than 300 animal units, as is the case for Canada Sheep & Lamb's proposed operation, file a yearly manure management plan. The plan requires identification of all land where composted manure would be spread; a soil test report must be submitted for each field identified on the plan. Operators have to submit a spreading confirmation form, which lists only those fields where manure was actually applied, as typically operators identify more land than required in the plan, to allow flexibility in spreading when either seeding plans change or weather conditions limit access to certain fields. While manure management plan information may not be accessed by the public due to *The Freedom of Information and Protection of Privacy Act*, neighbours can always request a copy of either the manure management plan or the spreading confirmation form for the current year from Canada Sheep & Lamb.

11) Location: When the property of a rural resident such as Mr. Shologin is entirely surrounded by land zoned "Agriculture Zone –A1", it can only be a shock to find out that the land is being acquired for the purpose of carrying on some form of intensive agricultural production. Canada Sheep & Lamb's proposal meets all the zoning and setback requirements set out in the Rural Municipality of Stuartburn. Canada Sheep & Lamb's proposal includes out of the ordinary facility design and a manure management system that will mitigate to a strict minimum odour nuisance and environmental impacts, if any. The abattoir, also part of the proposal, will in itself reduce road traffic on Franko Road versus moving market weight lambs to an alternate location. For these reason, Canada Sheep & Lamb will have very little, if any, impacts on Mr. Shologin's property and lifestyle.



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Mr & Mrs Hosty, Zhoda, MB (Roll #187000.000)

All that can be commented on in respect to this letter against any medium to larger scale agricultural enterprise, crop based or livestock based, is that all things being equal, odour and surface water concerns with the Canada Sheep & Lamb proposal owing to composting all lamb manure will result in a lesser source of nuisance odours and surface water concerns than for most other types of livestock operation with the same number of animal units.

Mrs E. Wade – location of residence not disclosed.

Mrs. Wade merely states her categorical opposition to the proposed lamb finishing facility. As she did not identify a specific concern, no response can be made.