



HYLIFE™

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December 8, 2023

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

Attn: Erin McCleery, TRC Coordinator

Re: File Nos. TRC -12-100 (Pinot Farms)

HyLife would like to acknowledge the concerns raised by residents regarding our proposed alteration to conditional use permit RCU-03-06 for our Pinot Farms pork production operation on SW-15-02-16-WPM in the Municipality of Killarney-Turtle Mountain. We respect their views and thank them for their time to comment in the Technical Review Committee's (TRC) public review process.

HyLife – Our Company and our Proposed Pinot Farms Alteration

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 Steinbach, 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.

The HyLife Pinot Farms site has been in operation since 2018 with a synthetic manure storage cover as per condition 6 of RCU-03-06 that states "That the earthen manure storage be covered with a synthetic cover to reduce odor". The use of a synthetic manure storage cover has proven over the course of the past 5 years of operation, to be ineffective and problematic for this purpose. Persistent issues and challenges have plagued the use of this cover through the installation and ongoing operation.

The initial challenge of this type of cover is the installation whereas it can only be installed on a completely empty storage, which only occurs once per year in the fall. No removal or installations can be attempted



during any other period throughout the year. The cover also cannot be repaired or maintained throughout the season, only during periods where the storage is emptied in the fall. High winds have proven problematic for the cover and it has incurred damage on an annual basis, leaving portions of the manure storage uncovered thus defeating the purpose of the cover. HyLife has committed significant time and effort to remedy this situation, working with multiple equipment providers to find an appropriate solution to these challenges and have not found a synthetic cover product available on the market that is designed to be installed and removed on an annual basis on an operating livestock manure storage.

The solution we are proposing is implementing the use of a straw cover on this storage facility, a technology that has been proven and utilized for many years within the livestock industry for this purpose. Installation of a straw cover can occur at any period throughout the year and can be touched up and improved throughout the season to provide full storage coverage on an ongoing basis. The use of a natural, biodegradable product for this purpose is the only recommended cover for use in this scenario and is one that we at HyLife would support.

Additional rationale for applying to alter this condition:

1. Safety - installation and removal of this storage cover has been identified as an ongoing workplace health and safety challenge. Elimination of the installation and removal of this cover on an annual basis will eliminate this challenge. Third party suppliers of these covers are also not supportive of the ongoing installations and removals as it has become a safety concern for their staff and their willingness to continue with this activity may be fleeting.
2. Landfill disposal – with the need to remove the cover annually, a significant amount of single use plastic is being disposed of in the landfill. This is a negative to the landfill as far as consuming unnecessary space as well as negative to the environment as this material is not biodegradable.
3. Precedent – the Pinot Farms site is the only livestock operation in the RM of Killarney-Turtle Mountain that requires a synthetic cover on the primary cell of the manure storage. This requirement was put on this facility even though it exceeds the minimum setback requirements for all residences, which is the purpose of the setback distances. Specifically, the Pinot Farms site exceeds existing setback guidelines by more than 2.6 times the minimum setback requirement.
4. BMP – the use of synthetic covers for primary cells of manure storages is not considered a best management practice by industry professionals within Manitoba Agriculture and they discourage the use of them.

Altering condition 6 of RCU-03-06 will provide HyLife with the ability to put in place a proven, functional, repairable, biodegradable straw cover that will provide for more effective and consistent odour control at the Pinot Farms facility.

Below are additional measures that are employed at the Pinot Farms operation for odour control.



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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 in-barn management has a significant and positive impact on the internal environment within the facility as well as a positive impact on the external environment.

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

With respect to manure nutrient application, we apply manure in the fall post harvest as a once per year event. Manure nutrient application is done on an anticipated 3-year rotational basis. Manure nutrients are applied in accordance with all applicable environmental regulations and utilize industry leading technologies. Application employs 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 Environment and Climate Change.

Collectively, these in-barn and outside environmental measures and manure management practices reduce odour from our operation. We value our reputation as a good corporate citizen in the communities in which we operate.

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

Sheldon Stott, Senior Director of Corporate Sustainability
HyLife Ltd.