



TECHNICAL REVIEW COMMITTEE

A TECHNICAL REVIEW REPORT

PREPARED FOR THE

RURAL MUNICIPALITY OF MORRIS

SUNNYBROOK SWINE INC.

NW $\frac{1}{4}$ 1-5-1 WPM

TRC 12-104

August 21, 2024

A. INTRODUCTION – THE TEAM

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

Agriculture (AGR)

- Agricultural Engineer
- Business Development Specialist
- Veterinarians
- Livestock Environment Specialist
- Nutrient Management Specialist

Economic Development, Investment, Trade and Natural Resources (EDITNR)

- 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, which may be consulted during the process.

THE TECHNICAL REVIEW COMMITTEE (TRC) REPORT

Purpose of TRC Reports

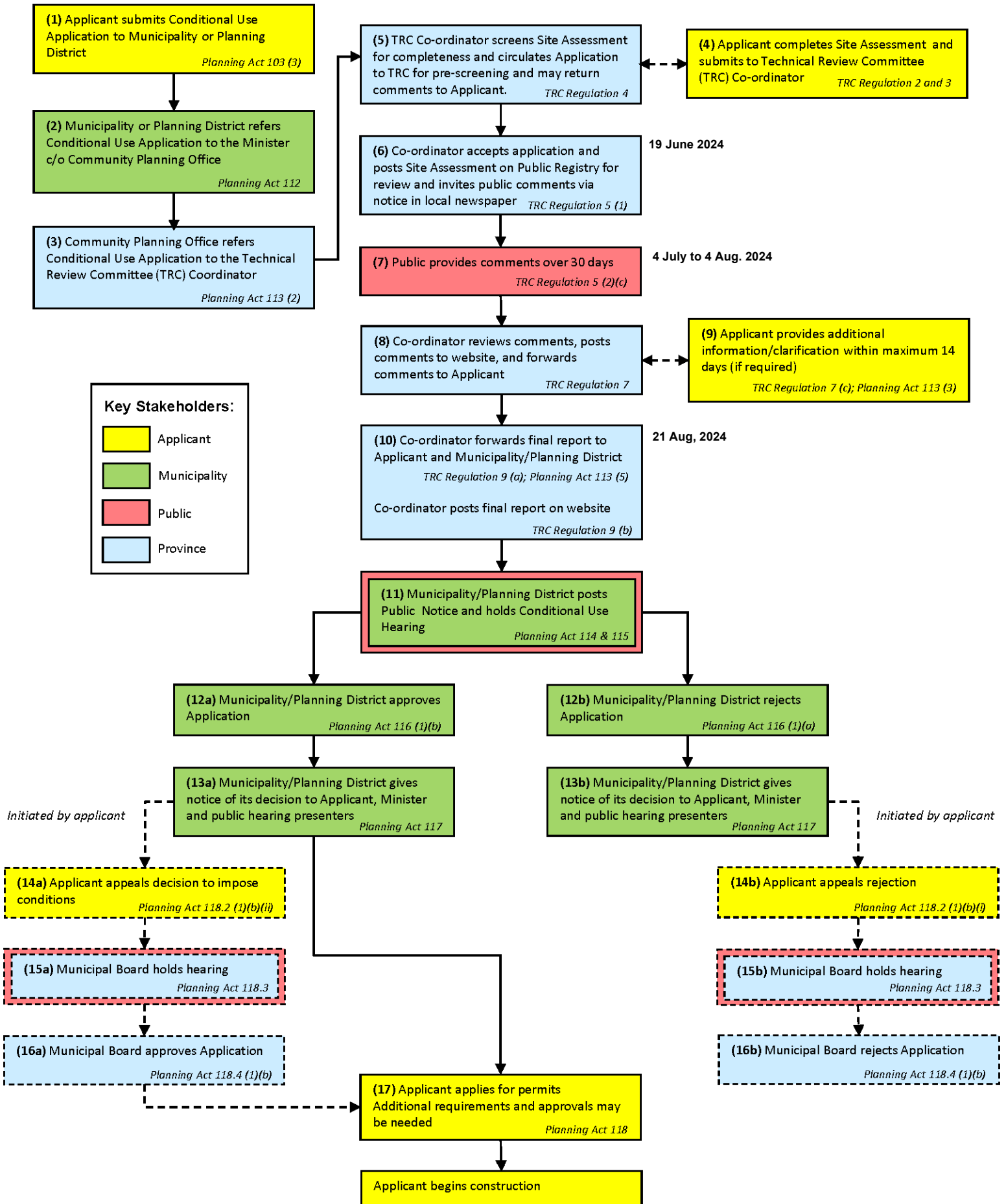
To provide objective, credible, technically-based assessments that:

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

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

Livestock Technical Review Process

(June 19, 2024)



B. DESCRIPTION OF PROPOSED LIVESTOCK OPERATION

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

Applicant: Sunnybrook Swine Inc.

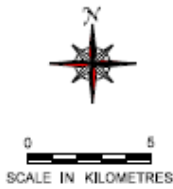
Site Location: NW ¼ 1-5-1 WPM (Refer to map below)

Proposal: To expand an existing pig operation by increasing sows (farrow to weanling) from 3000 (750 Animal Units) to 4500 animals (1125 Animal Units) and by increasing replacement gilts from 165 (24 Animal Units) to 250 animals (36 Animal Units).

This will involve the following:

- Construction of new farrowing barn addition and dry sow barn addition,
- Expansion of existing earthen manure storage,
- Estimated daily water use of 25,250 imperial gallons from existing well,
- Rendering of mortalities, and
- Truck haul routes as shown in map below.

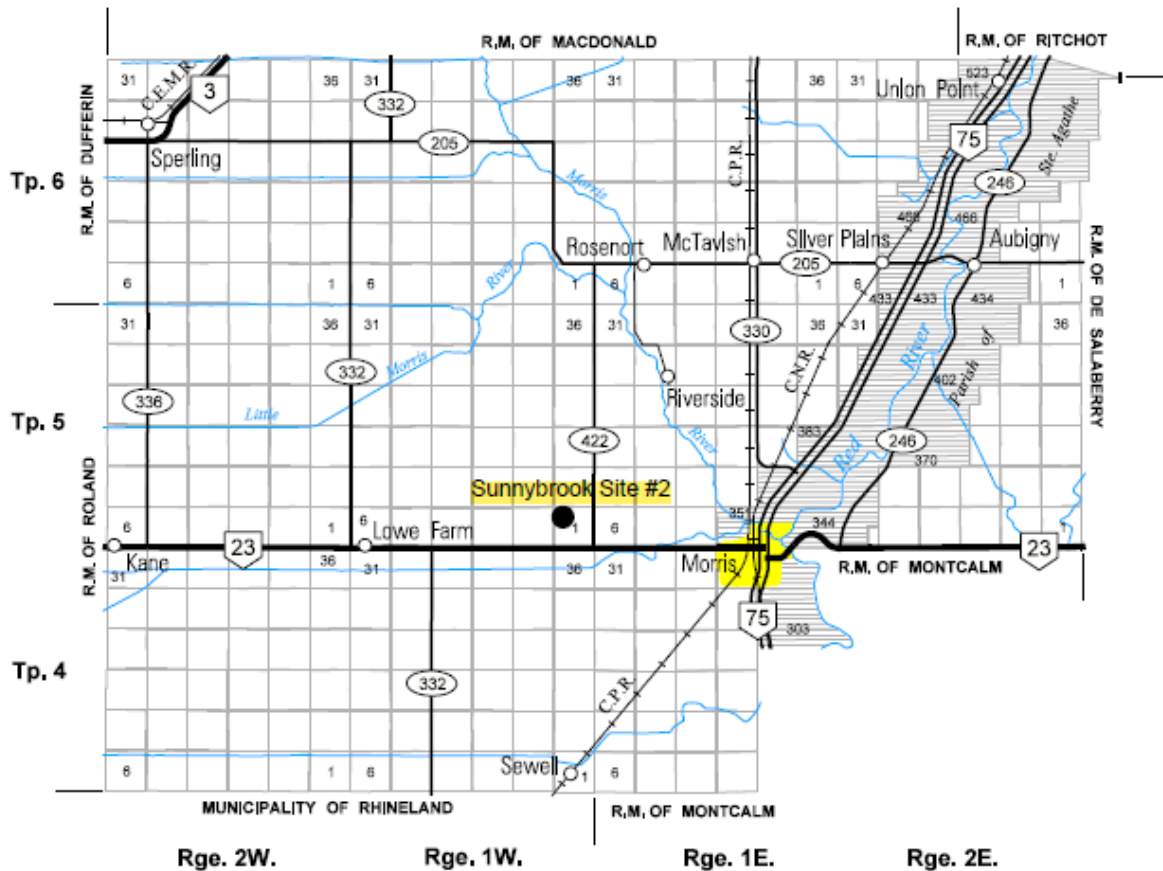
R.M. OF MORRIS



PROVINCE OF MANITOBA
INFRASTRUCTURE
HIGHWAY PLANNING AND DESIGN BRANCH
GEOGRAPHIC & RECORDS MANAGEMENT SECTION
WINNIPEG
JANUARY 1, 2015

LEGEND

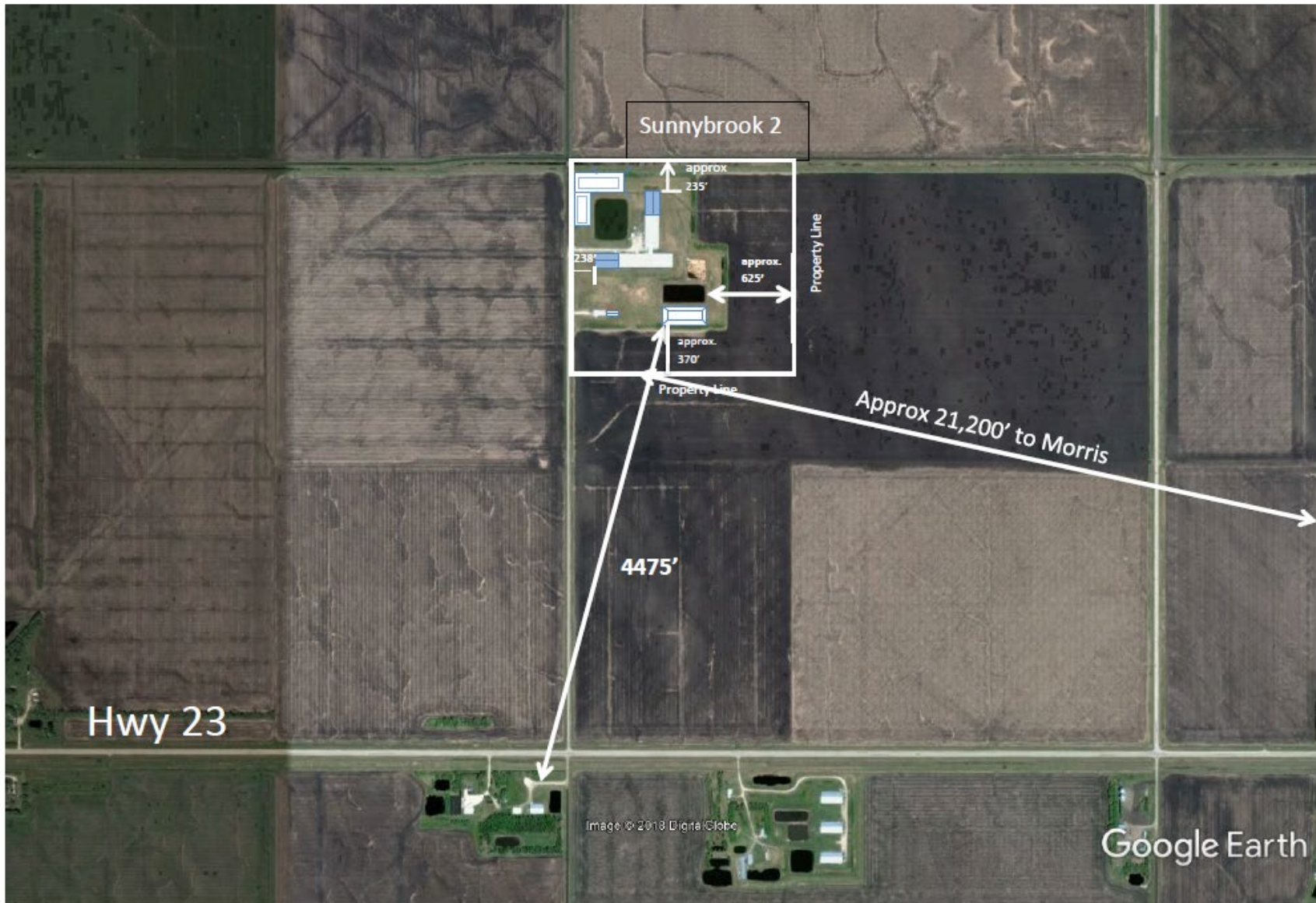
PROVINCIAL TRUNK HIGHWAYS		ACCESS ROADS	
PROVINCIAL ROADS		RAILWAYS	



SHEET 1 of 1

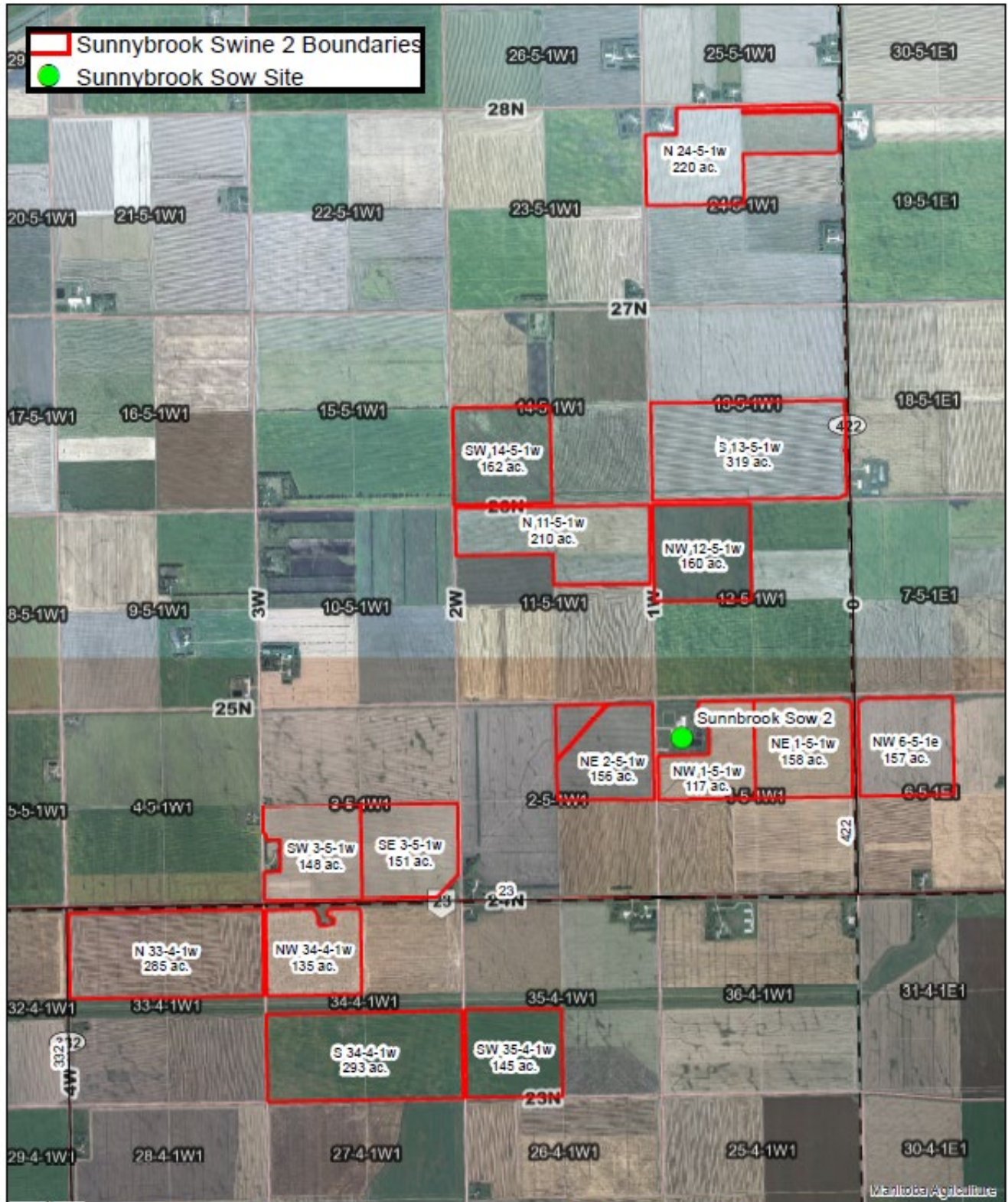


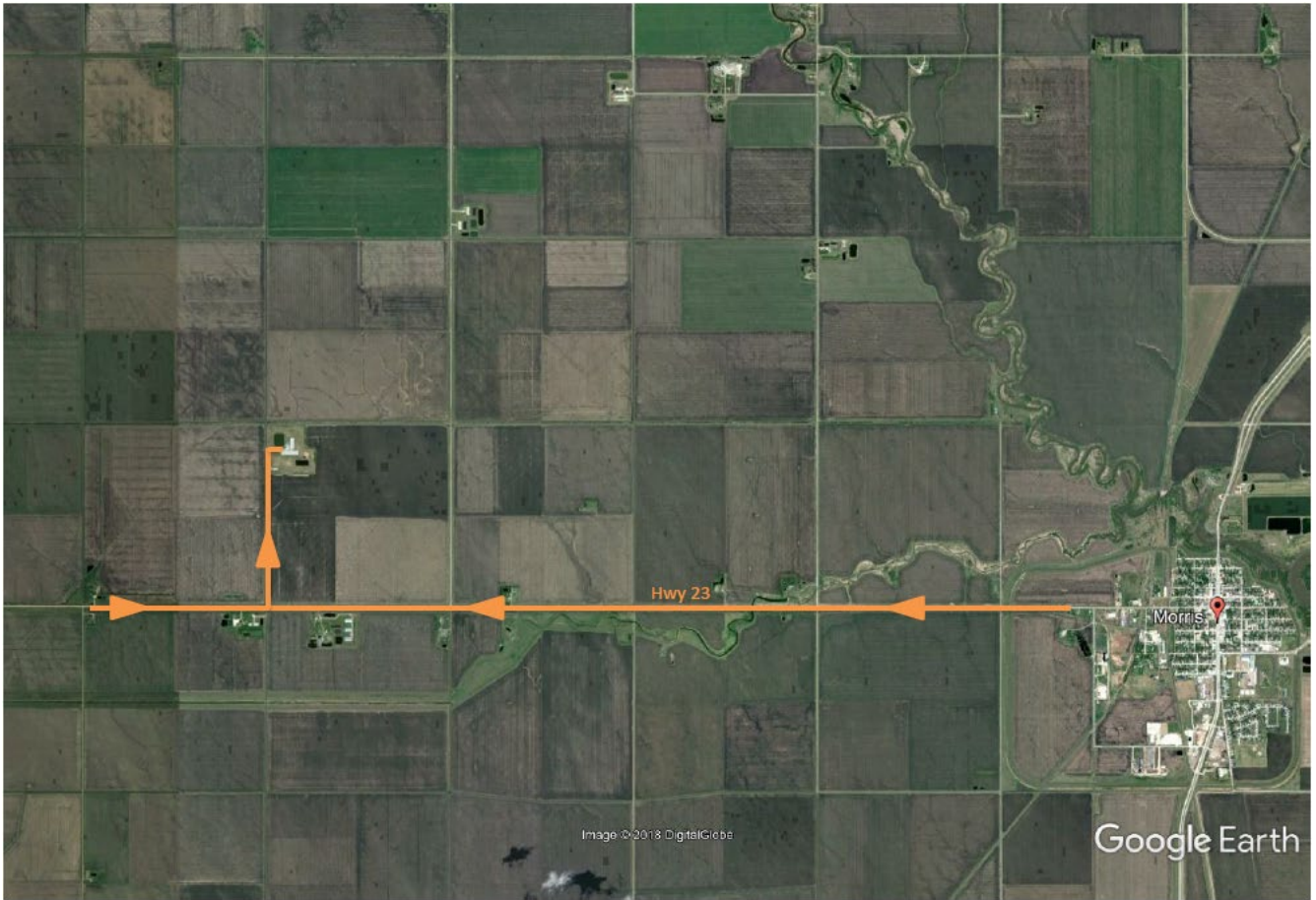
Proposed Sunnybrook Site 2 Site Plan



Sunnybrook 2 Site Location

Sunnybrook Sow 2 Spread Fields Map (01/23)





Truck Access/Haul Route

C. SITE ASSESSMENT OVERVIEW

Item No.	Provincial Requirements	Related Provincial Safeguards	Dept.
1	Submitted complete site assessment	The Technical Review Committee Regulation 119/2011 requires an applicant to submit a completed site assessment. *NOTE: The subject land is currently being subdivided as per subdivision application no. 4152-24-8370. Once the subdivision is approved, the subject land will be as described in the Site Assessment. The application has been conditionally approved. Final approval is expected before the end of 2024.	MNR
2	Clearly identified the current and proposed type and number of animals and animal units	Sunnybrook Swine Inc. (Site 2) is currently seeking Conditional Use approval to expand their pig operation from 3000 sows (farrow to wean) to 4500 sows (farrow to wean) with 250 additional replacement gilts. The total number of animal units will be 1161 AU.	AGR
3	Project clearly defined as: 1125 AU	The proposed animal confinement facility is not regulated under the Livestock Manure and Mortalities Management Regulation.	ECC
	<u>animal confinement facility</u>	Construction of a ±22,000 sq./ft. addition to existing Farrowing Barn and 20,412 sq./ft. addition to existing Dry Sow Barn. Both additions are in excess of 6,458 sq./ft. (600m) and will therefore require a building permit from the Inspections and Technical Services Branch (Municipal and Northern Relations) under <i>The Buildings Act</i> and the Manitoba Building Code. https://www.gov.mb.ca/labour/its/	MNR
4	Identified all existing and proposed buildings and structures and related separation distances	The identified existing and proposed buildings and structures meet the minimum required setbacks of the Zoning By-law (RM of Morris Zoning By-law No.1713/2015) for the “AG” Zone, based on the provided Site Assessment form and Project Site Plan.	MNR
5	Demonstrated project site is not located within Nutrient Management Zone N4 or any Nutrient Buffer Zone	The project site is not located within Nutrient Management Zone N4 or any Nutrient Buffer Zone.	ECC
6	Identified suitable water source: <u>Surface water - pond</u> with water consumption rate of <u>25,250</u> imperial gallons per day	Based on the water consumption information provided, the proponent is required to apply for a Water Rights Licence under <i>The Water Rights Act</i> . An application can be submitted via our online portal – https://web22.gov.mb.ca/Sso/Account/LogOn	ECC

Item No.	Provincial Requirements	Related Provincial Safeguards	Dept.
7	Proposed project site meets development plan, zoning by-law	<p><i>The Planning Act</i> requires that development plans include a livestock operation policy that guides zoning by-laws dealing with livestock operations.</p> <p><i>The Planning Act</i> also requires municipalities to issue development permits for any development on a site. All development must comply with the Zoning By-law and Development Plan. Any proposed development that does not meet the separation distances or setbacks requires Council approval and a public process to vary those requirements.</p> <p>Designation The proposed livestock operation, located in NW ¼ 1-5-1 WPM in the RM of Morris, is designated General Agriculture Policy Area (RM of Morris Development Plan By-law No. 1712/2015). The proposed operation complies with Development Policies 3.3.4 - 3.3.14 (Livestock Operations).</p> <p>Zoning The proposed site is zoned “AG” Agriculture General (RM of Morris Zoning By-law No.1713/2015) and has a minimum site area requirement of 80 acres with a minimum site width requirement of 600 ft.</p> <p>The proposed project will comply with the Zoning By-law.</p>	MNR
8	Identified any unsealed abandoned wells on the project site or spread fields	<p>The proposal identifies that the water use for the proposed livestock operation is from a surface water source.</p> <p>The proposal indicates that no abandoned wells present on the site or spread fields. However, if during the operation the proponent identifies any abandoned or unused well(s), it should be properly sealed and a sealed well report filed with the Groundwater Management Section of Environment and Climate Change.</p> <p>Information on possible well locations, well sealing and well sealing reports are available from Environment and Climate Change (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.</p> <p>During manure spreading, the setback distances to all groundwater features as prescribed under the Livestock Manure and Mortalities Management Regulation should be considered as a minimum distance.</p>	ECC

Item No.	Provincial Requirements	Related Provincial Safeguards	Dept.
9	Identified suitable manure storage methods	<p>The applicant will modify or expand an existing manure storage. Under the Livestock Manure and Mortalities Management Regulation, the applicant must obtain a permit from Environment and Climate Change to modify or expand the storage. Once in operation the applicant must:</p> <ul style="list-style-type: none"> • 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
10	Identified acceptable manure application methods	<p>Under the Livestock Manure and Mortalities Management Regulation, the applicant must:</p> <ul style="list-style-type: none"> • Operate with an annual manure management plan, which includes: <ul style="list-style-type: none"> ○ Manure type, volume, and nutrient values ○ Spread field location and soil class ○ Soil tests showing nitrogen and phosphorus levels ○ Crops to be grown 	ECC
11	Mortalities disposal methods identified rendering	<p>The applicant will render mortalities, which is an acceptable method of disposal. The applicant must keep the carcasses secure from scavengers, and ensure they are delivered to a rendering plant within four days after death unless refrigerated or frozen.</p>	ECC
12	Proposed suitable setback distances from water and property lines for manure, livestock and mortalities	<p>The applicant has indicated that all setback distances meet minimum requirements as set out in the Livestock Manure and Mortalities Management Regulation.</p>	ECC
13	Indicated if proposed project site is within designated flood area or is otherwise at risk of flooding	<p>The proposed project site is within the Red River Valley Designated Flood Area. The proposed new earthen manure storage, lagoon, and any other new structures will require a Designated Flood Area Permit.</p>	MTI
14	Proposed acceptable odour control measures	<p>Sunnybrook Swine Inc. has indicated that there are existing shelterbelts and that a straw cover will continue to be applied to the manure storage facility for the summer months. Should odour become a problem for neighbouring residents, there is a complaints process under <i>The Farm Practices Protection Act</i>. 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.</p> <p>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.</p>	AGR

Item No.	Provincial Requirements	Related Provincial Safeguards	Dept.
		<p>Section 116(1) of <i>The Planning Act</i> allows municipal councils to require a manure storage cover and the planting of a shelterbelt as a condition of approval.</p> <p>The proponent has indicated that there is an existing shelterbelt and that straw cover of manure storage in summer months will continue.</p>	MNR
15	Proposed sufficient and suitable land for manure spreading with minimum setbacks from water sources	The estimated land requirement for Sunnybrook Swine Inc. is 1704 acres for the phosphorus excreted by the livestock or 1220 acres for the nitrogen, whichever is higher. Sunnybrook Swine Inc. has satisfied the land requirement by demonstrating that they have access to 2816 suitable acres. Additional details can be found in the appendix.	AGR
		Under the Livestock Manure and Mortalities Management Regulation, manure spreading must meet setback distances to all surface watercourse and groundwater features.	ECC
16	Indicated if spread fields are located in the Red River Valley Special Management Area or any other regularly inundated area	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 in those fields between September 10 and November 10 must be injected or incorporated within 48 hours. This does not apply where perennial forages are established or where the soil is not disturbed except for seed planting or commercial fertilizer application and has adequate crop residue to control erosion.	ECC
17	Proposed spread fields that meet development plan and zoning by-law requirements	<p>The spread field locations are designated General Agricultural or Restricted Agricultural (RM of Morris Development Plan By-law No. 1712/15) and comply with Livestock Policies 3.3.4 -3.3.14.</p> <p>The proposed spread field locations are zoned "AG" General Agricultural or "AR" Restricted Agricultural Zone (RM of Morris Zoning By-law No.1713/2015) and support existing agricultural activity.</p>	MNR
18	Proposed acceptable manure transportation methods	No comment from Environment and Climate Change.	ECC

Item No.	Provincial Requirements	Related Provincial Safeguards	Dept.
	<u>dragline</u>	<p>Please be advised that any structures placed within the controlled area of PTH 23 and PR 422 (125 feet from the edge of the right-of-way) requires a permit from the Highway Planning and Design office. For permit information, please contact Juanita Mowbray at 204-583-2433 or by email at Juanita.Mowbray@gov.mb.ca. Permit information can also be found at https://forms.gov.mb.ca/highway-permits-application/index.html.</p> <p>The placements of temporary drag lines or any other temporary machinery/equipment for manure application within the right-of-way of PTH 23 or any PR 422 requires permission from Manitoba Transportation and Infrastructure's Steinbach Office. Please contact the Regional Planning Technologist, Robert Fender, at (204) 346-6266 or Robert.Fender@gov.mb.ca. In addition, please notify the Regional Planning Technologist for the placement of temporary draglines or other temporary equipment for manure application within the controlled area of PTH 23 or any PR 422 (125 feet from the edge of the right-of-way).</p>	MTI
19	Identified suitable trucking routes and access points	The proposed truck haul route utilizes an existing municipal road connecting to PTH 23. Manitoba Transportation and Infrastructure doesn't anticipate any significant increase in use of this road.	MTI
20	Identified proposed trucking routes – local roads	The proposed site is accessed by municipal road, PR, and PTH. As per Section 116(2) of <i>The Planning Act</i> , municipalities may require a proponent to enter into a development agreement regarding the condition and upkeep of local roads used as truck haul routes as a condition of approval.	MNR
21	Known rare species will not be impacted on new sites/lands	<p>The information provided in the assessment suggests that there will not be any conflicts with species protected under <i>The Endangered Species and Ecosystems Act</i> and/or <i>The Species at Risk Act</i> or designated as rare or uncommon by the Manitoba Conservation Data Centre (MBCDC).</p> <p>EDITNR's review of the information provided 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.</p>	EDITNR

Provincial Departments: Agriculture (AGR); Economic Development, Investment, Trade and Natural Resources (EDITNR); Environment and Climate Change (ECC); Transportation and Infrastructure (MTI); Municipal and Northern Relations (MNR)

D. PUBLIC COMMENTS AND DISPOSITIONS

Public Comment Summary	
Carol Loewen RM of Morris 2 miles NE of operation	Concerns: Existing odour from operation is too strong and expansion would make it worse. Inappropriate for significantly populated area.

A full copy of the public comments as well as the proponent's response may be viewed on the public registry at: https://www.gov.mb.ca/mr/livestock/public_registries.html

See Appendix B for the proponent's response to the public comments.

E. CONCLUSIONS AND RECOMMENDATIONS

Conclusion

The information contained in the Site Assessment submitted by the proponent generally meets provincial requirements. In addition, based on available information it has been determined that the proposed operation will not create a risk to health, safety or the environment, or that any risk can be minimized through the use of appropriate practices, measures and safeguards.

Recommended Actions to Council

1. As per Section 114(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 Morden 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 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. The information in the Site Assessment and supporting documents is based on final approval of a conditionally approved subdivision application. Council should consider including final approval of subdivision application, File# 4152-24-8370, as a condition in its Conditional Use Order.
4. 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 Morden Community Planning Office), and
 - c) every person who made representation at the hearing.
5. Councils are 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.
6. 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.
7. Council is welcome to contact Manitoba Environment and Climate, Environmental Approvals Branch or Regional Environmental Compliance and Enforcement staff with respect to the Livestock Manure and Mortalities Management Regulation (M.R. 42/98) including compliance and enforcement issues.

Recommended Actions to Proponent

- 1. That any additional measures identified through subsequent provincial licencing or permitting in order to minimize any identified risks to health, safety and the environment, be undertaken.
- 2. That as per Section 118.2(2)(b), an applicant may appeal the following decisions of a board or council to the Municipal Board:
 - 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.

F. TECHNICAL REVIEW COMMITTEE MEMBERS

Name	Department	Title Branch	Contact
Inonge Aliaga	Municipal and Northern Relations	Senior Planner <i>Community Planning Branch</i>	431-276-9741
Petra Loro	Agriculture	Livestock Environment Specialist <i>Sustainable Agriculture Branch</i>	204-918-0325
Colin Murray	Economic Development, Investment, Trade and Natural Resources	Information Manager- Manitoba Conservation Data Centre <i>Fish and Wildlife Branch, Natural Resources and Northern Development</i>	204-945-7760
Julie Froese	Environment and Climate Change	Environmental Livestock Coordinator <i>Environmental Approvals Branch</i>	204-945-7104
Jeff DiNella	Transportation and Infrastructure	Senior Development Review Technologist <i>Highway Planning and Design Branch</i>	204-945-2664

Appendix A

Manitoba Agriculture – Sustainable Agriculture Branch

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

Typical, modern feeding practices for pigs were used to estimate nutrient excretion for Sunnybrook Swine Inc. Realistic, long-term 10-year crop yields from the Manitoba Agricultural Services Corporation (MASC) for the RM of Morris were used to estimate crop nitrogen uptake and P 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. Reconnaissance soil survey is available in the area to determine the agriculture capability of the land. The soil survey indicates that most of the land is Class 2 and 3 (prime agricultural land). The most significant limitations in the area are wetness (W) and, to a lesser extent, salinity (N).

The estimated land requirement for Sunnybrook Swine Inc. is 1704 acres for the P excreted by the livestock or 1220 acres for the nitrogen, whichever is higher. Sunnybrook Swine Inc. has exceeded the land requirement by demonstrating that they have access to 2816 suitable acres.

Manitoba Environment and Climate Change – Water Science and Watershed Management Branch

Proper nutrient management applications that avoid excess loss of nutrients to surface waters are needed on lands receiving manure in southern Manitoba because long-term trend analysis of total phosphorus and total nitrogen has shown significant increases in these nutrients in the Assiniboine and Red rivers (Jones and Armstrong 2001).

The proponent is planning to apply manure in fall. Liquid manure will be applied using partial injection which reduces the risk to surface water when compared to surface broadcast alone.

For most crops, manure contains an excess of phosphorus (P) compared to nitrogen (N) and as a result, application at N-based rates causes a buildup of soil P. Practices which reduce N losses from the manure improve the N:P ratio in the manure and help slow P buildup when manure is applied at N-based rates. The proponent is planning to apply liquid manure with partial injection which will reduce N losses compared to broadcast application.

The proponent has acknowledged the setback areas for all water features have been observed and excluded from land base calculations. Setbacks should be clearly communicated to and observed by those involved in manure application to minimize the risk of nutrients entering surface and groundwater.

Manitoba has included phosphorus (P) as a nutrient by which fertilizer application through manure, synthetic fertilizer, and municipal waste sludge to agricultural lands may be limited. Many agricultural soils in Manitoba, especially areas with low livestock intensity (such as the RM of Morris), are considered P deficient and therefore, manure is an ideal fertilizer to support crop production. However, manure application can increase soil P over time and other spread fields may need to be added to prevent excessive soil P build up. As excess P levels build up in soils, greater losses occur to surface and ground water. It should be noted that Olsen soil-test P levels of 60 ppm are well above P needs

for most crops (over 20 ppm is usually considered agronomically very high). In areas of lower livestock intensity, such as the RM of Morris, it is the Province of Manitoba's policy to require sufficient suitable land for all of the N and half of the P generated by the livestock. This policy assumes that more land is available in the region to balance manure P with crop P removal, should it be required in the future for long-term sustainability. To remain environmentally sustainable over a long-term planning horizon of 25 years or more, the proponent acknowledges that 3,408 acres may be required for the operation. The proponent has identified 2,816 acres for manure application at this time. Application to meet crop N requirements is estimated to use 1,220 acres. Application at 2 times the crop removal of P is estimated to use 1,704 acres (3,408 acres is estimated to achieve P balance [P removal equal to P application] with current crop choices and yield potential).

As P levels build up in soils, the concentration of P in runoff to surface waters increases. It is important to rotate manure application across all spread fields and whenever possible focus manure applications on fields with low Olsen-P soil test levels so as to prevent excessive P buildup when applying manure at rates above P balance (P removal by harvested crops).

During manure spreading, setback distances to all groundwater features as prescribed under the Livestock Manure and Mortalities Management Regulation should be considered as a minimum distance.

Manitoba Transportation and Infrastructure – Hydrologic Forecasting & Water Management

The subject land is adjacent to the Anderson Drain, which is designated provincial water infrastructure. As such, it is subject to section 15.2(1) of *The Water Resources Administration Act*, which states:

Unless the minister has issued a permit for the activity, a person must not do any of the following:

- a. construct, or otherwise place or establish, any works or structures on, over, under, through or across provincial water infrastructure;*
- b. place material on, or remove material from, provincial water infrastructure;*
- c. perform any activity on or near provincial water infrastructure, or use the provincial water infrastructure in a manner, that*
 - i. affects or has the potential to affect its structural integrity,*
 - ii. degrades or has the potential to degrade its vegetation cover or any other covering material intended to limit erosion, or*
 - iii. has the potential to impair its function.*

A Provincial Water Infrastructure Permit must be obtained by Manitoba Transportation and Infrastructure prior to the commencement of any construction or activity on or near provincial water infrastructure. **All** construction or activities with the potential to affect provincial infrastructure will require a Provincial Water Infrastructure Permit. This includes all drainage infrastructure and activities.

A Provincial Water Infrastructure Permit may be applied for at: <https://forms.gov.mb.ca/pwww/>.

Manitoba Transportation and Infrastructure **will not** approve any new crossing on Provincial water infrastructure unless it can be demonstrated to be necessary. Property owners wanting access over Provincial water infrastructure must apply for a Provincial Water Infrastructure Permit, with works to be carried out at their own expense. The Province is not liable for any costs associated with providing access to newly developed properties.

Appendix B

August 20, 2024

Attn-TRC committee

Thanks for the opportunity to respond RE Sunnybrook Swine Inc TRC-12-104 expansion to 4500 sows.

Our goal is to have the expansion be contained within the existing yard space that is protected by trees on the south, east and north side of the property site. We plan to straw cover the primary cell of the lagoon to reduce the odour during the summer months. We do our best to manure apply in the fall after harvest or in the spring before seeding depending on the year and field conditions. When injecting the manure, we use umbilical hose to pump manure and the manure is injected directly in the soil to reduce the odour and increase the nutrient value of the manure for the crop. Presently it takes 2-3 days to do our existing manure application and our expectation with the expansion is that the application would be 3-4 days. We currently use and plan to use a professional agrology service to manage our manure in accordance with all applicable regulations.

Respectfully submitted by

A handwritten signature in black ink, appearing to read 'Dickson Gould', written in a cursive style.

Dickson Gould