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Sustainable Livestock Development

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Keystone Agricultural Producers along with the livestock commodity groups have been active in the consultation sessions leading up to the development of the Report prepared for the Government of Manitoba by the Livestock Stewardship Panel. KAP is pleased that the government has taken a proactive approach on this matter and overall, the recommendations are favorable for a sustainable livestock industry and for rural Manitoba. Our comments on the report, while not all in favor of the recommendations in their entirety, are premised on efficient, prosperous, farm businesses which are key to healthy rural communities.

During the past several years, there has been much discussion about livestock expansion in rural areas. With inconsistencies between municipalities, we believe that the province must be a partner in planning for livestock expansion. It is crucial that the Government's overall vision for agriculture includes the livestock sector and that the government clearly restate its commitment to the industry. There are opportunities for diversification and Government needs to ensure that these opportunities remain a viable option. Although its title alludes to “livestock”, the report seems to focus almost entirely on the hog industry by using recommendation wording that initiates discussion around the hog industry.

PLANNING FOR SUSTAINABLE LIVESTOCK DEVELOPMENT (Chapter 5)

Approval Process

The report recommends that “new and expanding ILOs should not be permitted in municipalities lacking land use zoning by-laws until such by-laws have been formally adopted”. As most municipalities are working towards developing land use by-laws, we feel that it is impractical to stop any changes in the industry until these by-laws are adopted. If this step is deemed necessary, it must apply to all development in the municipality not just the livestock industry. However, we feel that this extreme measure is not necessary and efforts should be continued to expedite the development and adoption of land use planning by-laws by all municipalities.

The report recommends that new and expanding ILOS should require formal approval by both the host municipality for compliance with its land use by-laws, and the province for environmental impact before construction is allowed to begin. This recommendation would allow the province to be responsible for the environmental impact portion of the project. This

would shift some of the responsibility to the province and by doing so, lessen the burden on a municipality. There must be consideration given by both the province and municipality to realistic and expeditious time frames for development and expansion of operations.

Appeal of Decision

It is of extreme importance that municipal land use priorities, which are transparent and scientifically sound, be established and maintained and all residences, existing and new, be made aware of these priorities. We do have a concern regarding differing land use priorities of the province versus the land use priorities of some municipalities. A clear provincial stance on expansion could help alleviate these concerns.

We are concerned with the fact that a development proposal can meet all of the requirements and conditions of government departments and the development plan of a local planning district but the proposal can still be denied by the municipality or local planning district. If a development proposal meets the requirements and conditions of government departments and the development plan of a local planning district, that producer should be able to build. The province has to be firm that its land use priorities are being respected and maintained by local planning districts when implementing local land use plans.

Geographic Information Systems (GIS)

KAP strongly supports provincial recognition of the value of GIS as it is a very useful tool for municipalities that are implementing a land use plan. Since municipalities have made an effort to be involved, provincial departments and agencies need to promote and help facilitate its use as a planning tool. There are challenges for municipalities when using the GIS tool, namely the maintenance of information accuracy within the planning area and the access to technical expertise to analyze the data to make sound planning decisions.

ENVIRONMENTAL AND HEALTH CONCERNS (Chapter 6)

Water Quality

The report recommends that water quality monitoring must be greatly increased to provide an assessment of the impact of livestock production on soil and water. While we recognize the need for such an assessment, it is clear that other types of human activity which may have an impact on water quality also need to be taken into consideration. The impact of rural residential and septic fields, for example, must come under much greater public scrutiny. Since the development proposal is built to the Department of Conservation standards, if the province implements a monitoring process, it should be the financial responsibility of the province. The province must ensure that the municipalities do not require additional monitoring by the producer that does not reflect the potential level of risk or is outside the jurisdiction of the municipality as this could serve as a barrier to development.

The report states that additional enforcement is required to ensure compliance with current regulations, particularly concerning manure management and storage, and penalties for infractions need to be increased. Additional regulations do not need to be implemented but

current regulations need to be enforced. There is a concern with enforcement being the responsibility of Conservation as opposed to Agriculture. It is very important that the officers who carry out the enforcement actions have an understanding of the agriculture industry in this province. We also stress that enforcement should first focus on compliance as opposed to penalties.

When imposed, penalties should be based on risk and reasonable tolerance levels must be considered. The enforcement officers must be able and willing to properly assess the level of risk and interpret the guidelines as they relate to agriculture. All of society must abide by the regulations and be treated equally when these regulations are enforced. Regulations should be enforced by the province, since municipalities do not have the resources or the staff to enforce such regulations.

The report suggests that the province should move towards regulating manure application according to phosphorus content of soil and manure, and future ILOs should be located in order to provide sufficient acres for manure application according to phosphorus content. At this point we believe this change in regulation is not necessary; however, research and monitoring would be beneficial and a more sustainable avenue of allocating resources. With soil testing necessary before manure application the ability to monitor soil phosphorus levels is in place. As there is no quick test equipment available for determining phosphorus content this makes it more difficult to spread manure based on phosphorus content at variable rates. The province should continue to implement the recommendations of the recently released Drinking Water Advisory Committee Report, especially recommendations for a drinking water coordinating center that is properly staffed and supported.

Threshold Level for Regulation of ILO's

We stand in firm opposition to the recommendation which states that the calculation of animal units should be cumulative across species. This recommendation would undoubtedly discourage diversification and expansion of the family farm. This change would adversely affect small hog or poultry operations in conjunction with a cattle operation which traditionally only spreads manure once per year. When you consider different business structures and multiple ownerships it makes it very difficult to ensure proper calculations.

The report goes on to say that in view of the lower threshold level in other provinces and some municipalities in Manitoba, the Livestock and Manure and Mortalities Regulation should be modified to require manure management plans for all new and existing ILOs of 300 AUs or more, and that winter spreading be prohibited for all new and existing ILOs above 300 AUs. Since we believe the current level of 400 AU is a practical threshold we oppose the reduction of the number of animal units. In cases where smaller animal units decide to go with year round storage, KAP believes incentives to move toward this practice would be beneficial for the producer and could also be beneficial for the municipality and the province. We also agree with the development of technology that enhances manure management practices. If the current threshold level is changed it should be done in consultation and agreement with the commodity groups on whom this will have an impact and also undertaken during the normal review process.

When reviewing and considering changes to threshold levels, all stakeholders need to consider winter storage, the timing of completing and filing manure management plans, and the timing of the conditional use process. Government also needs to give consideration to the implications that a reduction in AU's would have on other commodities. We believe that the 400 AU's was selected as a reasonable level of environmental risk and therefore it should be maintained.

Health Issues

The report suggests that strong research and development emphasis should be placed on the monitoring of pathogens and the mechanisms by which they are transferred from animals to humans, and upon factors such as the design of barns, manure storages, and spreading practices which minimize such transfer. Prior to targeting the minimization of the transfer of diseases, we need to determine the extent to which this represents an actual risk for Manitobans.

There is some question as to the pertinence of this to livestock production in this province. We have to consider if the dollars would be more beneficial for the industry if targeted to another area. The province also needs to put the level of risk into context when considering the impact on people by exposure to pathogens. Any study of pathogen transfer should not be limited to agriculture storages but rather needs to look at the broad picture including the public health impacts of municipal sewage. The transfer of wildlife diseases to domestic animals is also a concern but the report does not address this potentially troublesome area. We recommend that the province monitor the transfer of the transmission of wildlife diseases to domestic animals.

KAP applauds government on its recognition of the need to safeguard the health and safety of agricultural employees. However, there are concerns with increased regulation, monitoring and enforcement. For the purposes of this report, we would like to stress that the livestock sectors have been extremely proactive in developing on-farm manuals that promote and help implement a monitoring process for the safety of workers. There are also training sessions developed for barn workers. We agree with the recommendation that all barn workers be strongly encouraged to wear dust masks; however, we believe that this is already a well accepted industry practice.

We believe that there are presently methods of information gathering available to members of the general public to familiarize themselves with the in-barn environment and the precautions that are taken to raise healthy animals (eg. Touch the Farm). These are important initiatives. However, the public has to recognize that there are good reasons why they are not permitted to enter barns. Producers have legitimate concerns about the public bringing contaminants into the barn. The report recommends that as a matter of responsibility to Manitobans, government and the industry should make clear why and how the industry uses antibiotics. The government also needs to include in its awareness activities the actions taken by industry to prevent residues and reduce antibiotic use, such as quality assurance and herd health programs.

Livestock & Climate Change

The recommendation suggesting that the Government of Manitoba give serious consideration to accelerating the process of making the public generally, and the agriculture sector particularly,

aware of the impacts of climate change, and the range of measures for mitigating and adapting to climate change needs to be expanded. This issue involves all of society and is an ongoing process with which everyone needs to be involved.

MANAGEMENT ISSUES (Chapter 7)

Manure Management

KAP agrees with the recommendation which states that educational institutions, in cooperation with industry and government, should re-assess the training requirements for professionals and technicians in the nutrient management field. We believe that this should be an ongoing process. We need to assess the necessity of the formal certification of commercial nutrient applicators and its implications. An 'association' of applicators to deal with information and ideas could potentially be more beneficial than formal certification.

We encourage and support a voluntary educational effort which provides training in nutrient management as we believe it would be very beneficial for the industry. It is important that there is an awareness of the regulations. There has to be an understanding in the industry of where the responsibility and liability rests for the application of manure. What responsibility and liability does the land owner, land operator, applicator, barn owner, or barn operator have in the manure application process?

We understand the concern over odor control, reducing greenhouse gas emissions, and maximizing nutrient capture, but the implementation of covered manure storage and injection by ILOs raises some concerns. Injection technology is not available for implementation by all sectors, for example the cattle industry. We also should consider that there may be other technologies that can sufficiently take care of any potential problems.

Riparian Management

The report recommends that the MCPA should take the lead in developing a strategic initiative for riparian management in Manitoba. This should be done in partnership with groups such as MHHC, DU, Conservation Districts, and PFRA, as well as Manitoba Agriculture and Food and Manitoba Conservation. This is an ongoing activity but riparian management is more than a livestock issue; it must include all of agriculture as well as municipalities. It also has implications for cottage development and recreational activities. The Department of Fisheries and Oceans also needs to be involved in this area of management.

Performance Bonds

The Minister has stated that the government would not be implementing the recommendations dealing with environmental performance bonds and we support this decision.

Demonstration Sites

The suggestion that Manitoba Pork Council should coordinate the development of a state of the art hog production site and manure handling facility that can test the latest techniques to

improve sustainability of the hog industry and improve the in barn environment is a noble idea. The cost to develop and maintain such a facility to serve an educational role for the general public, as well as the practicalities of operating such a site do not make it feasible for the industry to support it alone. All industry partners, including government, should play a part in the demonstration of the viability of the agriculture industry. There are existing facilities that can serve a similar role, such as the Prairie Swine Centre.

SOCIO-ECONOMIC ISSUES (Chapter 8)

The two recommendations in this section are dealing with public perception and the sustainability of smaller farms through research and the adoption of technology. Society needs to recognize the potential of incentives to achieve socio-economic issues for the public benefit. In order to maintain a viable community, it is necessary to ensure the maintenance of local infrastructure, provide employment opportunities and an acceptable quality of life. When considering research, government needs to be aware of research projects that are currently ongoing and be prepared to share the burden with the industry by directing more resources towards new and innovative research.

INFORMATION SYSTEMS & RESEARCH (Chapter 9)

Information Systems & Database

There may be benefits to the Government of Manitoba accumulating and maintaining all relevant data concerning livestock operations in a GIS format to provide a realistic assessment of the sustainability of current operations and their effect on both local and provincial governments. However, if this data base is developed the use of this information should be strictly controlled. The government also needs to investigate the legal implications of gathering this information and how to prevent the misuse of such an information database.

Environmental Stewardship

The report recommends that “Government should maintain a pro-active role and sustained leadership in mounting research related to environmental stewardship. It should be prepared to read signals (such as the consequences of climate change) and “blue-sky” and “what if”. It should have strong regard for the precautionary principle”. Industry believes that while the precautionary principle has merit, using it to ensure that change does not occur is not the intent. We must ensure that its use does not equate to no change and a “zero risk” policy.

Monitoring the Nutrients in Manure

KAP also believes that research should be encouraged into the development of portable manure nutrient measurement equipment. If there can be improvements, it will be beneficial for our industry. **Earthen Manure Storages** The report recommends that “research into the application of electromagnetic spectrometry (EMS) to detect leakages in manure storages, already being tested in the field by PFRA, should be extended to support a strong monitoring and inspection effort. Further, an EMS profile of each new manure storage structure should be obtained as a

baseline before its initial filling”. While it is a good step in the process, to date we are unsure of the capabilities.

The technology has been proven very useful in determining potential site locations for earthen manure storage structures. If it could be used as a monitoring tool it could help alleviate potential concerns about so-called leakage from earthen storage structures. However, at its’ current stage of development we are told that it is probably not capable of detecting small leaks from storage structures. If this technology is applicable for livestock manure storages it should also be applicable to monitor municipal lagoons.

Odor and its Measurement

A systematic study of Manitobans living near ILOs with a view to improving the criteria upon which municipalities base siting decisions as the report recommends could be quite costly and, as such the issue of who would fund such a project would need to be resolved. Prior to being undertaken, the necessity of this project should be justified. The Farm Practices Guidelines already recognize the uncertainties in general recommendations on setbacks and the need for very careful on-site assessments as recommended by the Panel.

Run-Off

The report recommends that a long term study should be initiated on the behavior and quality of water (including nutrients and pathogens) running off fields in a natural state and those fertilized with manure and /or inorganic fertilizers. This research should be tailored to demonstrate the results to the public. We believe that with increased water monitoring, many of these results will be realized without additional initiatives.

Health of Animals

The Panel recommends that research should be conducted on the impact of air quality on animal health and production to indicate the financial benefits of maintaining clean air and less odor through nutritional management and different feeding strategies. We would like to underscore the fact that this type of research is already occurring at various research institutions. Government should also assist in creating an awareness of these activities and encourage their continuation. There are ongoing research programs in the area of animal housing in ILOs and government should ensure that this is monitored continuously. There is a need for an awareness program that deals with all aspects of the agriculture industry including the livestock sector and animal husbandry.

Communications

The panel recommends that “the livestock industry and provincial government should re-examine and increase their communication and extension efforts with a view to heightening the awareness of improved technologies and management approaches derived from research and development”. This is an ongoing activity by all of the livestock commodity groups, but we do recommend that government should continue to be a partner in the implementation of such activities which, at times, may require more resources.

The panel also recommends that “government, having eased the means by which data is accessed, should organize its tasks in such a way that competent specialists are on call to consult with both ILO and smaller operators, or point them useful directions. Such a service should be particularly useful to new entrants to the livestock industry”. Government should continue to provide the service of the various livestock specialists and expand those services as required by industry. The specialized services are also available to industry at a fee for service.

INFORMATION SYSTEMS & RESEARCH (Chapter 10)

Role of Provincial Government

The Panel recommends that “Government focus substantially increased resources on the intensive livestock industry in Manitoba to provide analysis, guidance, inspection, monitoring, enforcement and technological assistance that can accommodate the present scale of the industry and anticipate its expansion”. We recognize the need for increased monitoring but the public needs to recognize that the cost of monitoring for public benefit must not be borne by producers. This is a means for the public to support the livestock industry in a way that is ‘green’ under trade rules.

KAP believes that comprehensive analysis of the potential impact of new or expanded ILOs upon both local and larger area environments would assist producers and the economic health of the community as a whole. If undertaken, it is crucial that the public, also recognizing the benefit of potential economic development in the community, assist financially with the cost of this analysis. The Panel recommends that “Government develop and make public the policy framework through which expansion will take place, stressing its concern for sustainability”.

KAP stresses that Government should place more focus and emphasis on rural sustainability and the need of rural communities to provide economic activity that creates jobs and employment in the local area.

CONCLUSION

In closing, we would like to again acknowledge the commitment of government to the sustainable development of our industry. Producers have had to adapt to change and governments (both provincial and municipal) must create an atmosphere that will assist this adaptation process. The future viability of agriculture in Manitoba is very much dependant on government making the right choices as far as the implementation of the “Finding Common Ground” recommendations is concerned.