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**Manitoba Cattle Producers Association
Presentation to the Clean Environment Commission
Hog Production Industry Review**

**Wednesday, April 25, 2007
Canad Inn Portage la Prairie**

On behalf of the Manitoba Cattle Producers Association, we would like to thank the members of the Clean Environment Commission for the opportunity to provide you with some input into this process.

The MCPA represents approximately 10,000 producers involved in various aspects of the beef cattle industry, including the cow/calf, backgrounding and finishing sectors. The cattle industry is worth in excess of \$500 million annually to the Manitoba economy.

Over the past several weeks, the CEC has had the opportunity to travel across the province to learn about the public's views of Manitoba's hog industry. As you prepare to review the information you have collected these past few weeks, the MCPA would like to leave you with a few thoughts and recommendations.

The MCPA strongly encourages the CEC to adhere to its mandate, which is to look at the environmental measures in place related to Manitoba's hog industry, and to determine the industry's environmental sustainability. We believe your review should be technical by nature, and informed by sound science, not simply by the public's perceptions of the issues.

As livestock producers, we have a tremendous respect for the land, as it is what sustains our operations and in turn our families and our communities. As you will have learned throughout the course of these hearings, Manitoba's agricultural industry is very heavily regulated. Although some members of the public may have the misconception that farmers are somehow free to do anything they wish on their operations, this is simply not the case.

There are dozens of acts and regulations in Manitoba that govern agriculture. On-farm site inspections occur. Failure to adhere to the rules can lead to prosecution and fines. Manitoba's hog producers and cattle producers are regulated by many of the same pieces of legislation when it comes to factors such as nutrient management, manure management, land use planning and approval, and odour, to name a few. Three of these key pieces include the Environment Act, the Planning Act and the Livestock Manure and Mortalities Management Regulation.

We must reiterate -- in Manitoba, livestock production does not take place in some sort of regulatory or production management void. We have some of the strictest environmental rules in North America.

As cattle producers, we take many steps to manage our operations' manure, to protect wildlife and riparian areas, to apply nutrients at agronomic rates, to properly dispose of mortalities, to manage odour, and to adhere to siting and setback requirements. Moreover, to expand our operations beyond a certain size, we must go through strict land use planning and approval processes, often involving a public hearing component and a technical review process.

As such, modern livestock production is both extremely technical and bureaucratic by nature. At times, it seems we spend as much time managing the paper related to the environmental regulations as we do caring for our animals. But, by taking these steps and adhering to these

regulations, we protect not only Manitoba's surface water, ground water and soil, but also the longevity of our operations. It simply does not make environmental or economic sense for producers to abuse their key natural resource – their farms.

The MCPA believes there must be some consistency and predictability when it comes to the regulatory process around livestock operations. We cannot reasonably continue to end up in situations where livestock operations seeking to expand their operations have gone through the technical review processes, met all the provincial and municipal environmental and regulatory requirements, only to have their applications denied for no sound scientific reason.

The MCPA believes that environmental decisions must be based on sound science, and that emotions and misconceptions must not be allowed to stand in the way of sustainable agricultural development. We realize the argument will be made that each proponent can bring a different scientist to the table to argue for their respective position. In assessing what is sound science, the MCPA recommends that the Commission look for data that is current, peer-reviewed, tested, and that is applicable to the unique soil and climate conditions in Manitoba.

The MCPA would encourage the Commission to seek out the research related to livestock, soils and water that is currently underway in Manitoba. You may find that some of the traditionally held conceptions about nutrient run-off do not hold up under the scientific microscope. We also believe that both government and industry alike have an important role to play in supporting research. It seems that at times in recent years, providing up-to-date research has taken a back seat to enforcement of rules that may not reflect the reality on the landscape.

Manitoba's livestock producers remain deeply committed to seeing their industry move forward. But as the regulatory environment government our sector increases, so do the costs to producers to adapt. Cattle producers are price takers, not price setters. We simply cannot pass along the increasing regulatory costs that we face to the consumers of our products. Yet by continuously updating our production methods and incorporating new ways to protect the environment, we are providing an environmental service that benefits all Manitobans. We hope that our contributions will be recognized by citizens and government policy makers alike, as we do not take our social responsibility lightly.

The MCPA therefore recommends that an incentive-based approach be encouraged when introducing new environmental regulations. If the government is going to expect producers to continually modify their operations, some financial incentives and technical expertise to help them adapt to the new rules would certainly be welcomed and are essential to moving through this process.

The MCPA also believe that producers must be provided with reasonable timelines to make the transition to operating under new regulations. Changing production practices takes time and can be costly. Cattle producers are willing to do their part, but no one will benefit if we are driven off the land because the regulatory costs are too onerous for producers to bear.

In a similar vein, the MCPA recommends that government undertaken cost-benefit and economic impact analyses of proposed environmental regulations before they are enacted. It is critical that there is a sound scientific rationale behind the introduction of new rules to help ensure that they will have the desired outcomes.

Livestock production is a key economic driver in Manitoba, creating thousands of direct and indirect jobs. The current pause on the hog industry is having a ripple effect in Manitoba's livestock sector and its allied industries. There is deep concern that the pause will be extended without a basis in science, and this will have negative economic consequences not only for producers, but for all Manitobans. In addition to protecting the environment, the government has a responsibility to create a sound business environment. The current pause sends a negative signal to the business community in Manitoba and beyond our borders.

The rules relating to livestock development have been extensively debated and reviewed in Manitoba for many years. We have said it before and we will say it again. The vast majority of Manitobans do not live their lives under the same degree of environmental scrutiny as farmers. They are free to apply fertilizers and herbicides to their lawns and gardens with impunity. Some municipal lagoons are discharged into waterways. Oil and other chemicals are dumped down drains and batteries tossed in the garbage. What are the environmental standards in these cases?

The Commission will wrap up its hearings tomorrow. The MCPA reiterates its desire to see this review process completed within a reasonable time frame – preferably months and not a year from now -- so as to help quell the uncertainty in the agricultural community.

We recognize the Commission has been tasked with a tremendous responsibility and placed in a difficult position, trying to balance science off against public opinion. We wish you success with your work.

In closing, the MCPA believes that caring for Manitoba's environment is simply not the sole responsibility of the farm community. Producers, individual citizens, manufacturers, processors, businesses and municipal governments share an equal responsibility in protecting the environment. By working collaboratively, the MCPA believes that government and all Manitobans can devise sustainable development policies that will protect our resources for years to come.

I would like to thank the Commission members for the opportunity to be here this evening. I would be pleased to try to answer any questions you might have. Thank you.