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EXHIBIT NUMBER: WSB-007
File Name: Hog Review
Date: MAR 19, 2007
Received by: [Signature]

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Portage la Prairie, MB
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March 12, 2007

The Manitoba Clean Environment Commission
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(Commission Secretary)

Dear sir/madam:

I would like to provide a few comments for consideration in the Manitoba Hog Industry Review. As a general principle, I don't think that anyone would have a concern with the hog industry if it were able to operate without imparting an offensive noxious odor to neighboring properties. Also, I don't think that anyone would have a concern with the hog industry if it refrained from introducing excessive amounts of nitrogen and phosphorous into the landscape. Unfortunately, it seems the hog industry in Manitoba is unable or unwilling to do either of these things and would rather we accept the stench in the air and the pollution of our waterways as an acceptable price for others to pay in order for them to operate in a profitable manner.

No other industry in Manitoba pollutes the air and water as overtly as the hog industry. We are assured that the offensive odor is not harmful and therefore it should not be considered to be pollution. We should accept it as a normal farming practice. However, no other normal farming practice has such an offensive odor. In August of 2006 I returned from a trip to Minnesota to be greeted at the Canada-US border at Emerson with the now familiar overpowering stench of hog manure. From the border all the way to Winnipeg the air reeked of hog manure – a fine welcome home to Manitoba. We don't smell other agricultural enterprises, manufacturing industries, or even the sewage of a city of some 630,000 people when we enter the province. We do smell the hog industry.

The largest industry in the world is the tourism industry and it is the industry with the greatest growth potential. It is all well and good to re-brand Manitoba and promote the province through advertising to capitalize on this, but the reality is that people will not visit places that stink. Instead of embracing the tourism industry and protecting its assets for tourism, Manitoba is putting them at risk for the benefit of an industry that claims to be valuable to the economy while looking for government financial assistance every time there is a downturn in hog prices.

We live at the southern edge of Delta Marsh in the RM of Portage la Prairie, three kilometers west of a large hog operation, so I have some relevant experience as the neighbor of a hog operation. Delta Marsh is recognized under the Ramsar Convention as

a Wetland of International Significance, a Canadian Important Bird Area by Bird Studies Canada, a Manitoba Heritage Marsh and a Wildlife Management Area. It is a great natural habitat rich in wildlife. However, there was and is nothing preventing the establishment of a large scale hog operation in this area.

The hog operation next to Delta Marsh was opposed by local residents and those concerned about wildlife when it was first proposed. It was approved nevertheless on the condition that all of its manure would be injected. Assurances were provided that every possible means would be used to minimize its impact on air and water quality and minimize the risk of contaminating the marsh. There was nothing to worry about.

The assurances proved to be completely without foundation and those concerned with the proposed operation were proven correct. After it was established, the operation was significantly expanded, with additional above ground uncovered storage tanks constructed to hold manure. Although it was compelled to inject all of its manure through its conditional use permit, this operation spread hog manure on the surface anyway. It was first authorized to do so by a special permit issued by the municipality without the knowledge or consent of local residents. When people complained about the odor and the apparent violation of the conditional use permit, they learned that the municipality had betrayed their interests and premise upon which the operation had been approved in the first place. The RM withdrew its permit when condemned in the local media for allowing hog manure to be spread on fields immediately adjacent to a waterway. However, in 2004 and 2005 this operation persisted in spreading hog manure in violation of its conditional use permit. When I complained about the violations to Environment officers, they said it was not their responsibility to enforce the conditional use permit. When I complained to the RM, they said that I should complain to the Environment officers. In the end, no enforcement action was ever taken by anyone.

With the recent changes to The Planning Act, municipalities can no longer impose restrictions on large scale hog operations, such as the requirement to inject all of the manure. The hog operation next to our home is now free to spread its hog manure at will, even though it was initially established on the basis that all of its manure would be injected. There may be guidelines to limit the amount that can be spread and buffers along waterways, but there is no effective enforcement of these guidelines. When an operation has more hog manure than it has fields to spread it on, the manure is no longer a source of nutrients for fertilizing crops – it is a waste product that has to be dumped as inexpensively as possible. It is applied at a much higher rate than desirable for crop production and the odor is horrendous for a longer period of time as the fields become saturated and cannot be cultivated for several days. Although the operation near us claims to practice immediate incorporation, the reality is that even under ideal conditions it can be several days before the field dries enough for the waste to be turned into the soil. Spring run-off washes nutrients from these spread fields into adjacent ditches and the paleo-channels draining into Delta Marsh. The drainage system in our immediate area is haphazard, with run-off from surrounding lands entering our property from municipal ditches and overland. Any over-application of nutrients on surrounding lands has an adverse effect on water quality and vegetation on our property.

Another irksome aspect of the revised Planning Act is that it makes the covering of manure storage facilities optional and at the discretion of the municipality. A single hog operation emits more odor than the sewage treatment facilities for the City of Winnipeg. Why are municipalities able to treat sewage from a large human population in a manner that emits little odor, while hog operations are not required to do likewise? Why is it unacceptable to gag on the odor of human waste, while perfectly acceptable to choke on the odor of hog waste? Hog operations should be compelled to cover all of their manure storage facilities and take other measures to ensure that their odor does not leave their own property. The spreading of manure on fields results in obnoxious odors for a short period of time in the fall, while uncovered manure storage facilities are a source of noxious odors throughout the year.

Large scale hog operations are both a large consumer of potable water and a source of nutrient rich wastewater. The consumption of potable water for these operations is a concern in our area as sources of usable groundwater are sporadic and shallow. The deep groundwater is too saline to be used for human consumption, while sources of good groundwater in shallow aquifers are localized. In our area the nearby hog operation uses one of these shallow aquifers and has drawn it down to such an extent that existing wells on surrounding properties no longer provide usable water. The ground water beneath our property is unfit for human consumption because of the infiltration of contaminants from surrounding lands and other impurities in the water. We were fortunate in our area to have municipal water service provided for us, but others may not be so lucky.

Manitoba is at a crossroads with respect to the hog industry. The province could decide to let the hog industry carry on unabated, polluting the air, land and water. Families like mine can move to another province where the residents care more for the quality of the air they breathe and the environment in which they live. Or, Manitoba can advise the hog industry that if it wishes to operate in this province it must confine its odors to its own property and not contribute nutrients to our waterways and lakes. If those conditions make the hog industry uneconomical to operate, then good riddance to them. If they can find a way to confine their odor to their own property and refrain from polluting our waters, without forcing the taxpayer to pay them to do so, then they should be welcome to stay.

Yours truly,

Glen Suggett

10 Days After Straw Cover
was applied

