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Letter seeking clarification to the Manitoba Pork Council Submission to the  
Manitoba Clean Environment Commission Hog Industry Review, March 5, 2007

By Glen Koroluk, Beyond Factory Farming Coalition, May 7, 2007

EXHIBIT NUMBER: WSUB-059

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Received by: [Signature]  
(Commission Secretary)

1. Between Section 3-3 and 3-4, an untitled map depicts the Distribution of Operations against Manitoba's Land Use. A larger scale map with color may provide valuable information such as possible operations being located in environmentally sensitive areas. Can we receive a larger scale color version of this map, which will assist us in providing more accurate comments that may be relevant for the upcoming science report?
2. Section 3-5, Part 2.4 provides meaningless pig density data. A more accurate depiction of pig densities would involve calculating figures on a regional basis where high concentrations are known. (ie, Seine River watershed, the RMs of Hanover, La Broquerie or De Salaberry).
3. Section 3-9, Part 6 – Feed Use – The Manitoba Pork Council (MPC) suggest that the pig industry is a big boom for Manitoba grain farmers, however their figure for 2005 of more than one quarter of feed grain imported into the province, does not include inter-provincial imports. We have attached a report by **Agriculture, Agri—Food Canada (Manitoba's Pork Value Chain)**, which would refute the benefits accrued by Manitoba grain farmers. We seek clarification on this import grain figure and require more detail on what the trend has been since the loss of the Crow rate.
4. Section 3-12, Part 7.3. MPC fails to mention that Best Brands, a hog slaughter facility located in Winnipeg, which killed 1 million hogs per year, closed its operations in mid 2005. Is MPC aware of this closure and do they have a theory as to why the operation ceased? We are also under the understanding that Spring Hill, a kill plant located in Neepawa, is also under financial stress and recently obtained an assistance package from the provincial government. Can MPC verify the standing of

the Spring Hill slaughter facility and provide a reason for its financial difficulties given that MPC is calling for additional slaughter capacity in Manitoba?

5. Section 4-6, Part 1.1. MPC admits that ammonia emissions from barns and manure storage facilities can be significant and that volatilized ammonia can have direct ecological effects. Can MPC clarify the extent of these ecological effects and give a figure as to how much ammonia is deposited into the atmosphere (in the form of NH<sub>3</sub> and NO) from the various sources of Manitoba's hog industry?
6. Section 4-7, Part 1.1.1. MPC suggests that a good strategy to reduce NH<sub>3</sub> emissions is to increase the frequency of barn cleaning. We understand that frequent barn cleaning will increase the use of water, increase the generation of liquid slurry and therefore increase the cost of manure application. Can the MPC clarify this best management practice?
7. Section 4-13, Part 2.2. The MPC admits that there is build-up of phosphorus when applying untreated manure based on its nitrogen content. They suggest that annual crops take up N and P in a ratio of about 5 to 7:1. The data in Tables 2, 3 and 4 measures the N to P ratio of hog manure at approximately 3:1 meaning that 2 to 2 ½ times more phosphorus that is required by annual crops is applied to any given parcel of land. Can the MPC clarify whether the Manitoba government's new phosphorus regulation will immediately reduce the build-up of P on all parcels of land which receive untreated liquid hog slurry as fertilizer?
8. Section 4-24, Part 2.5.1. The leaching of nitrogen into the groundwater is a serious problem in Manitoba. We have included **actual data of groundwater quality** from two different distinct data sets housed by Manitoba Water Stewardship/Conservation. Can the MPC clarify the hog industry's contribution to groundwater contamination?

9. Section 4-26, Part 2.6. The MPC claims the hog industry contributes about 1.5% of total phosphorus to Lake Winnipeg on an annual basis. Can MPC clarify its methodology in determining this amount and provide the scientific research to support this finding?
10. Section 4-33, Part 2.71. Can the MPC clarify the Johnson and Robert's analysis of 2001 and indicate what the phosphorus levels were for those fields that had liquid hog manure applied?
11. Section 4-35, Part 2.7.1. The MPC suggests that reducing commercial P applications in agricultural regions that have a high P surplus will provide long-term sustainability, however MPC previously stated that the liquid slurry system causes P imbalances at the field level (see question 7 above). Can the MPC clarify the number of fields that receive applications of both liquid hog slurry and commercial P fertilizer?
12. Section 5-2, Part 1. The MPC states that water used is carefully monitored to reduce the volume of manure produced? Can the MPC give us an actual water consumption based on those operations that are metered? Using less water is contrary to what MPC says is a good strategy to reduce NH<sub>3</sub> air emissions. (see question 6 above) What are the local cumulative impacts from water use from individual operations?
13. Section 5-4, Part 1. Can the MPC clarify the steps required to maintain the integrity of a storage facility or how operations are decommissioned? Is MPC aware of any decommissioned sites?
14. Section 5-6, Part 2.1. The MPC suggest that over 73% of all hog manure within Manitoba that is land applied complies with a manure management plan. Can MPC clarify how they obtained this figure and verify its authenticity by providing manure management plans and corresponding Manitoba Conservation inspection records?

15. Section 6-3, Part 1.1. The MPC suggest that the new Planning Act was a product that balanced divergent interests in Manitoba. Can the MPC clarify how they reached this conclusion? As an attachment, we have provided you a copy of **Hansard June 6 and June 7, 2005**, which recorded the official positions of the various interests in the legislature of Manitoba.
16. Section 6-14, Part 1.4.3. The MPC contests that compatibility with the surrounding area and detriments to health should not be offered to local governments as reasons to reject an application. MPC fail to identify the health impacts on those who live in proximity to an ILO. Can the MPC clarify what these health impacts may be? We have enclosed **peer-reviewed health studies** for your understanding.
17. Section 7-22, Part 3. Can MPC clarify the number of operations who require a Water Rights License (for groundwater and surface water), but are absent of one? What amount of water would this equate to and what have been the impacts to the local hydrology in any water stressed areas?
18. Section 7-25, Part 5. Can MPC clarify and identify the research that indicates that groundwater contamination is attributable to poor well construction and maintenance?
19. Section 9-12, Part 1.4. MPC claims that high loadings of some metals occurred from a relatively low percentage of samples and loading of most metals was very low for most manure. Can MPC clarify this statement and give us a breakdown of the loadings over time? While MPC compare loading thresholds of metals to Alberta guidelines for municipal wastewater, are these guidelines comparable to CCME guidelines and Manitoba Environment Act license requirements?
20. Section 10-6, Part 3. MPC states that separation distances were developed 13 years ago by a number of stakeholders. Can the MPC clarify whether these

distances are based on health impact studies, what the experiences were from other provinces and whether these distances afford protection to community health?

21. Section 10-10, Part 5. Can the MPC indicate the percentage of the general rural public who are aware of the Farm Practice Protection Board and whether complaints to Manitoba Conservation, which deal with air emissions and nuisances, are referred to the Board? MPC suggests that the Board is highly successful, can MPC provide the documentation for this conclusion. MPC cites a report by DGH Engineering that appears to minimize the contribution of odor to the quality of life for nearby neighbors. Can the MPC collaborate these findings with **objective peer reviewed research**? We have enclosed examples of research from other jurisdictions.
22. Section 10-14, Typical Process Flow Chart. MPC identifies inputs to rations, such as antibiotics, probiotics, meat, bonemeal and blood, but do not track the final environmental fate of these additives. Can the MPC clarify the fate of these additives and their impact to the environment and human health? **We have enclosed some background research for your perusal.**
23. Section 11-3, Part 5. Can the MPC clarify the type of infectious diseases that are transmitted between pigs and humans and indicate the incidence of this occurring in Manitoba?
24. Section 12-5, Part 3. Can the MPC clarify whether the 3% of total Manitoba GHG emissions attributable to the pork industry includes the transport of grain, pigs and manure?