



TECHNICAL REVIEW COMMITTEE

A TECHNICAL REVIEW REPORT

PREPARED FOR THE

Rural Municipality of Grey

DIVORNE FARMS LTD. (SITES 1 & 2)

SE ¼ 8-8-6 WPM (Site 1)

TRC 12-113

SE ¼ 6-8-6 WPM & SW ¼ 5-8-6 WPM (Site 2)

TRC 12-114

August 7, 2025

A. INTRODUCTION – THE TEAM

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

Agriculture (AGR)

- Agri-Resource Engineer
- Business Development Specialists
- Veterinarians
- Agri-Ecosystem Specialists

Natural Resources and Indigenous Futures (NRIF)

- 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 or is consulted during the TRC process.

THE TECHNICAL REVIEW COMMITTEE (TRC) REPORT

Purpose of TRC Reports

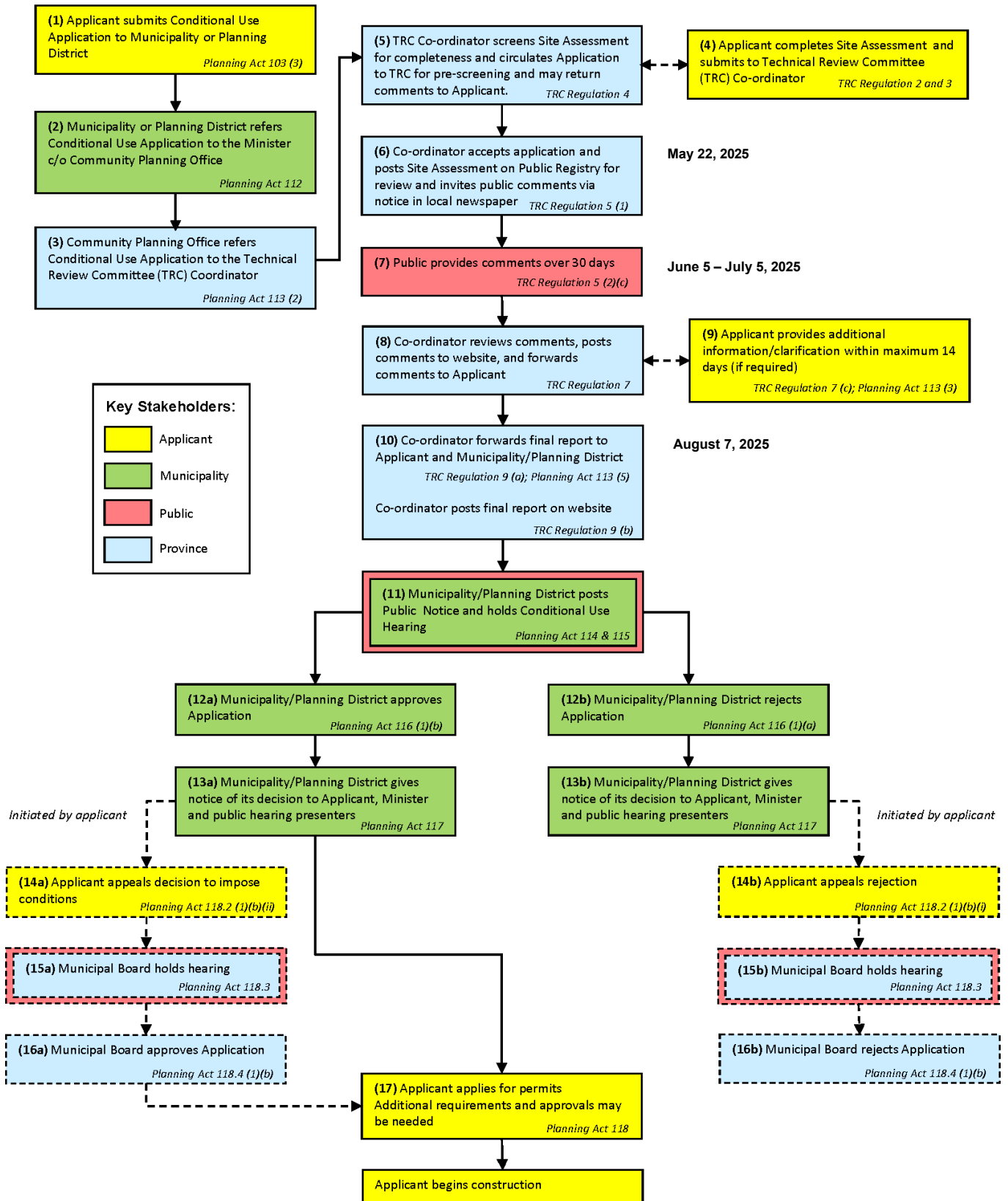
To provide objective, credible, technically-based assessments that:

- a) Enable municipal councils or planning district boards to make informed decisions regarding Conditional Use applications;
- b) Create common stakeholder understanding regarding livestock proposals, their 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 councils/boards and proponents; and
- e) Represent 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 a municipal council or planning district board provide conditional approval of a 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 council/board's rejection of their application or appeal a condition imposed on the approval of a council/board to the Municipal Board.

Livestock Technical Review Process

(June 19, 2024)



B. DESCRIPTION OF PROPOSED LIVESTOCK OPERATION

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

Applicant: Divorne Farms Ltd.

Site 1 Location: SE ¼ 8-8-6 WPM (Refer to map on p 5)

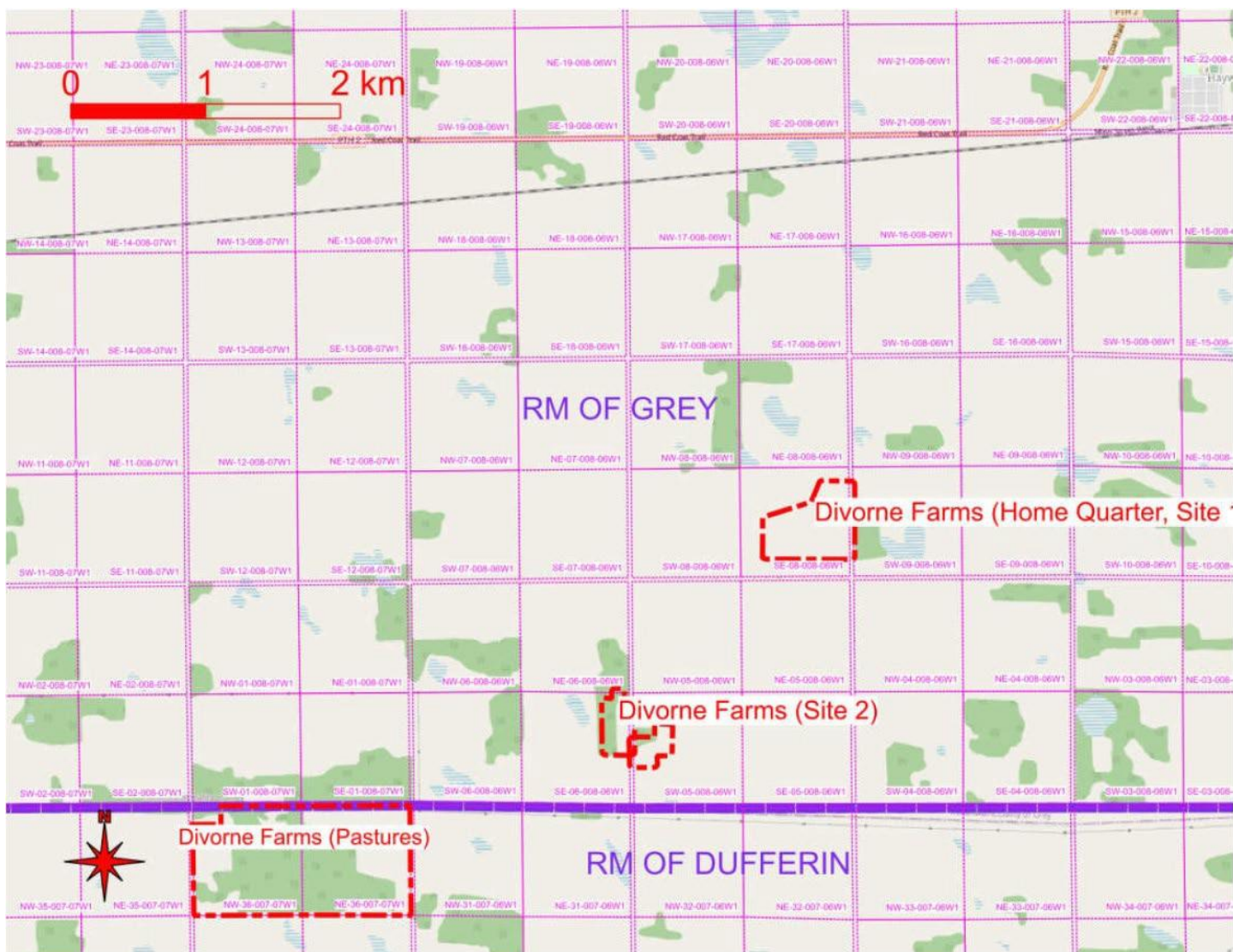
Site 2 Location: SE ¼ 6-8-6 WPM and SW ¼ 5-8-6 WPM (Refer to map on p 5)

Proposal: The applicant proposes to expand an existing dairy operation. The proposal involves increasing mature dairy cows (lactating and dry) including associated livestock from 535 (1,070 Animal Units) to 1,750 animals (3,500 Animal Units) across Site 1 and Site 2, which comprise a single operation. This includes heifers to be maintained on Site 2, not exceeding 533 Animal Units.

This will involve the following:

- Construction of one new dairy barn (Site 1) to replace a previous barn destroyed by fire; use of two existing dairy barns (Site 1) and one existing heifer barn (Site 2) as is; use of existing exercise yards (Site 1) and feeding pens (Site 2) as is;
- Construction of new earthen manure storage (Site 1) and use of existing steel manure storage tank earthen and field manure storage;
- Estimated daily water use of 94,830 imperial gallons from an existing well and piped service;
- Composting of mortalities; and
- Truck haul routes as shown in map below.

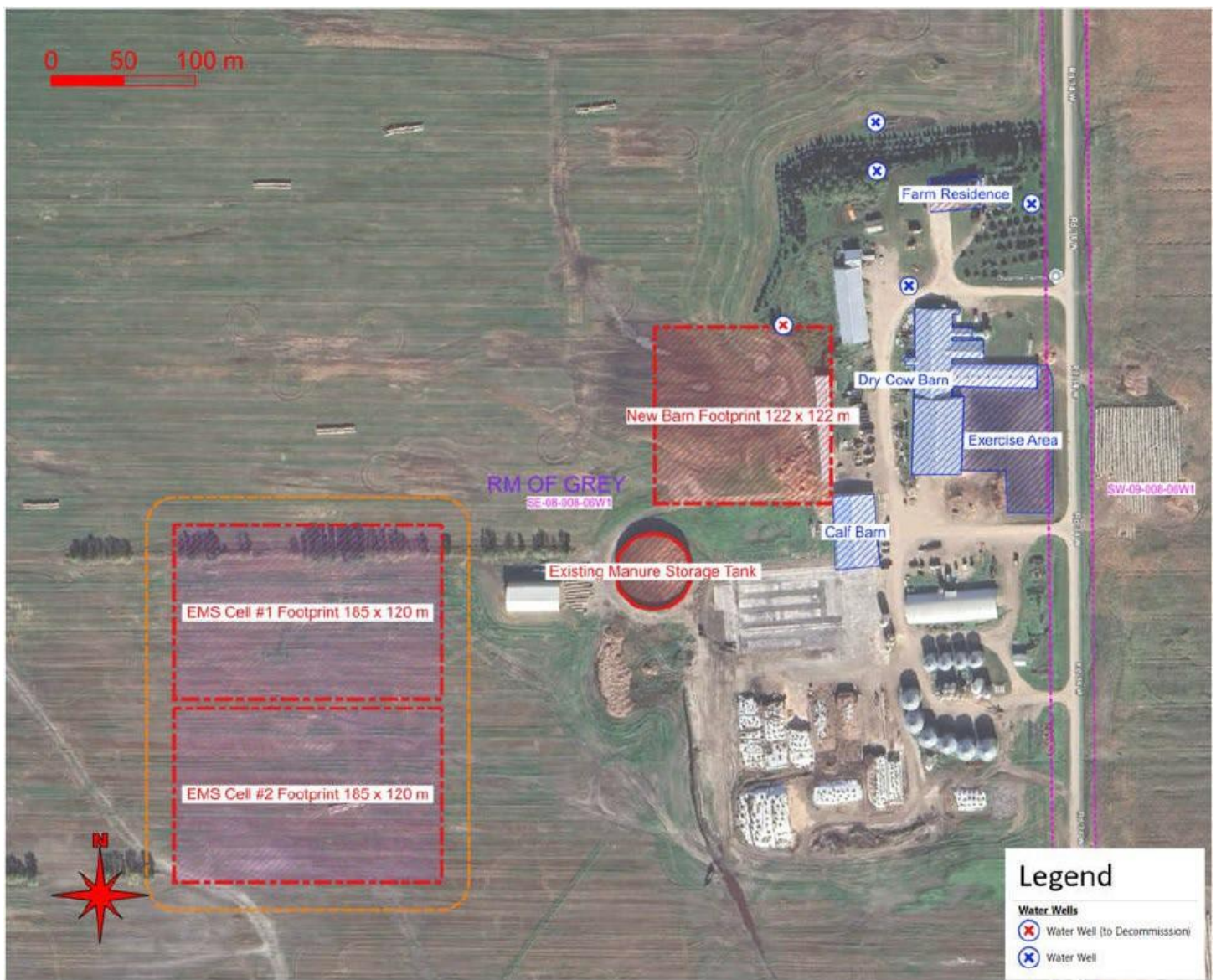
** Site 1 and Site 2 are separate Conditional Use applications, each requiring an independent Provincial technical review. However, because the sites share a herd and spreadfields, a single technical report has been prepared to address both. Throughout this report, the sites will be assessed jointly or individually as appropriate.*



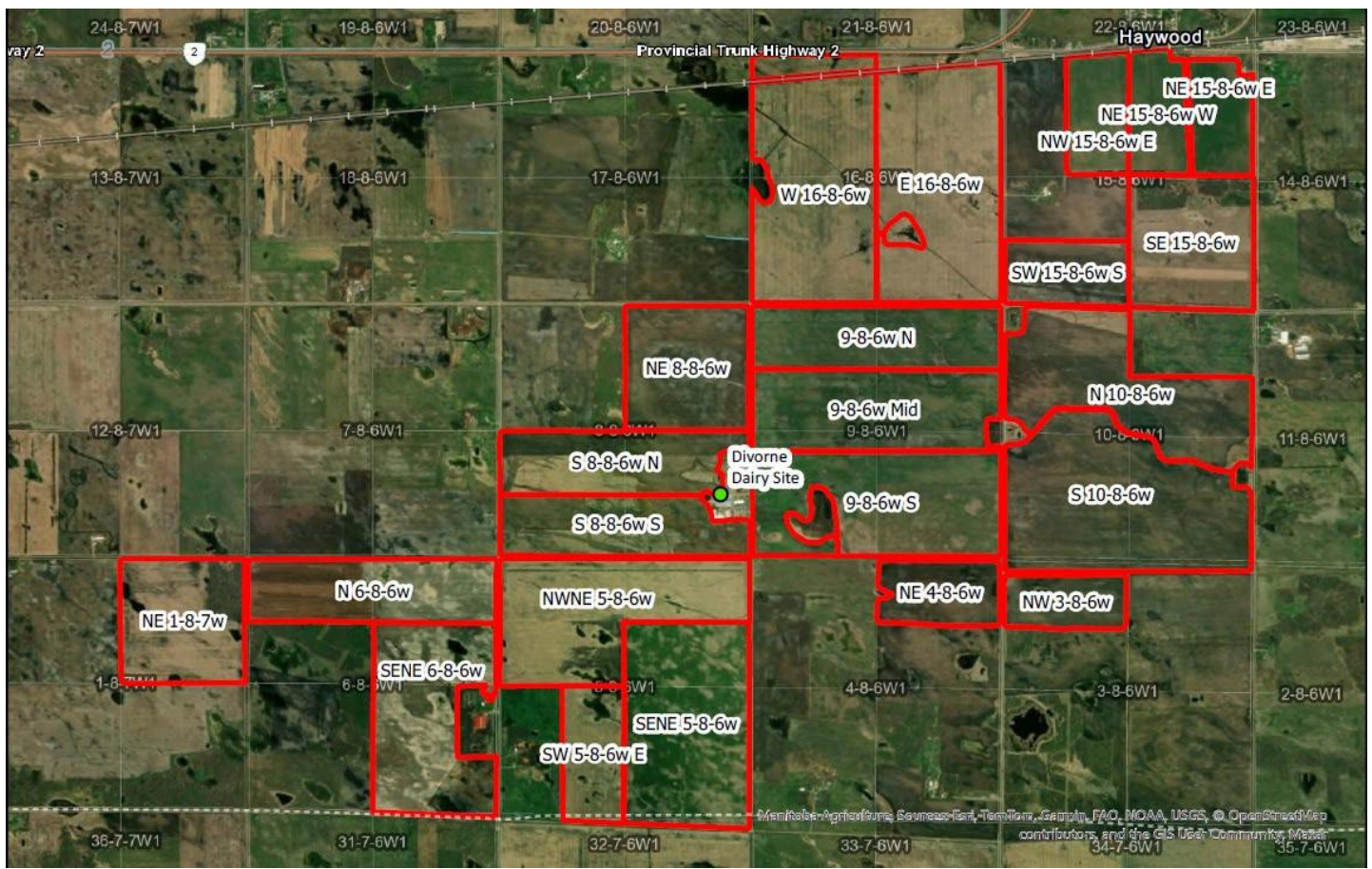
Location Map



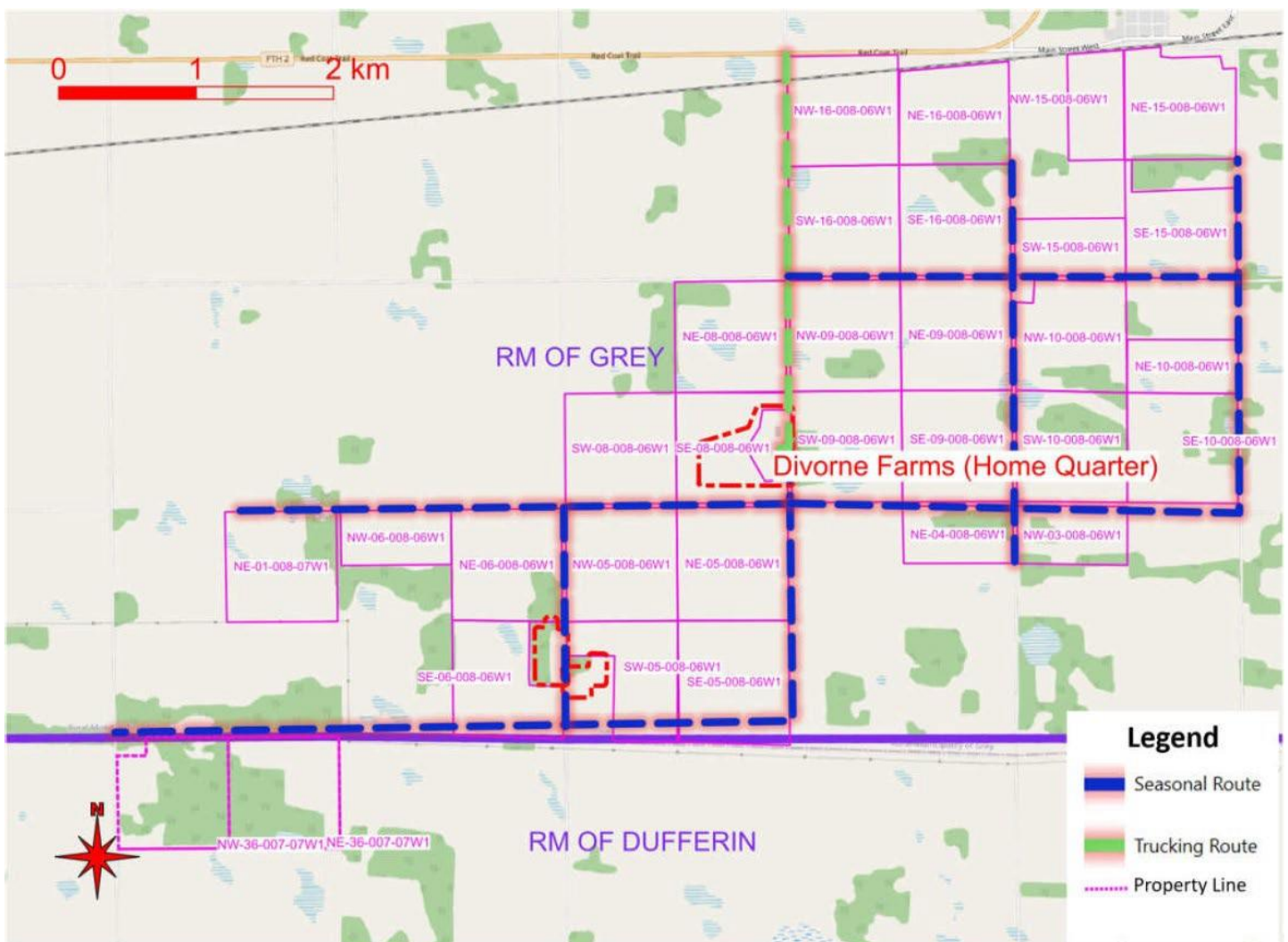
Project Site Plan (Site 1)



Project Site Plan (Site 2)



Spread Fields Map



Truck Haul Route Map

C. SITE ASSESSMENT OVERVIEW

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
1	Description of Operation and Nature of Project	The Planning Act requires that that an application to approve a conditional use for a livestock operation involving 300 or more animal units must be referred to the Livestock Technical Review Committee (TRC) for review. The Grey-St. Claude Planning District Development Plan By-law No. 2/99 states that Council shall refer all applications for new or expanding livestock operations involving 300 or more animal units to the Minister and request that a Technical Review Committee be appointed to review the proposed application. Divorner Farms Ltd.'s applications are for an expanding dairy operations of more than 300 animal units. As such, they have been referred to the TRC for review. The Technical Review Committee Regulation 119/2011 requires an applicant to submit a completed site assessment. The TRC has received and accepted for review a complete site assessment from Divorner Farms Ltd., including all information necessary to review the applications. The two applications are being reviewed together because the herd and spreadfields are shared between the sites. Throughout this table, the sites will be assessed jointly or individually as appropriate.	MNR
2	Type and Size of Operation	Divorner Farms is seeking Conditional Use approval from the RM of Grey to expand their two dairy operations to 1750 mature cows, including associated livestock. The total animal units would be 3500 AU.	AGR
3	Animal Confinement Facilities	Site 1 The proposed expansion will see the construction of a new ±160,210 sq./ft. dairy barn. The barn replaces a smaller barn that was lost to fire in 2024. The proposed barn will house will be able to handle the 535 dairy cattle, with the intent to support an operation of 1,750 dairy cows. As all buildings proposed for construction exceed 6,458 ft² (600 m²), building permits must first be issued by the Carman-Dufferin-Grey building inspector, as required by the Inspection and Technical Services Branch, Department of Advanced Education, Skills and Immigration, under Manitoba Building Code Regulation M.R. 78/2023. For more information, see the Inspection and Technical Services Branch website: https://www.gov.mb.ca/labour/its/bldg_codes/permits_and_inspections.html Site 2 No new buildings are proposed for this site. An existing 65,000 sq./ft. heifer barn will continue to be used. There are no renovations or plans to alter the existing barn, so there should be no need to obtain building permits for this site.	MNR

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
4	Confined livestock areas	Site 1 The applicant will use existing confined livestock areas (CLA). Under the Livestock Manure and Mortalities Management Regulation, the applicant must: - Ensure the CLA does not pollute surface water, a surface watercourse, groundwater, or soil. - Remove manure at least once per year and store or land-apply.	ECC
		Site 2 The applicant will use existing confined livestock areas (CLA). Under the Livestock Manure and Mortalities Management Regulation, the applicant must: - Ensure the CLA does not pollute surface water, a surface watercourse, groundwater, or soil. - Remove manure at least once per year and store or land-apply.	
5	Project Sites Unsuitable for Development	Site 1 The confined livestock area and/or manure storage facility is not located within Nutrient Management Zone N4 or any Nutrient Buffer Zone.	ECC
		Site 2 The confined livestock area and/or manure storage facility is not located within Nutrient Management Zone N4 or any Nutrient Buffer Zone.	
6	Water Source: Pembina Valley Water Co-op and existing well Water Requirements of 94,300 imperial gallons per day	The proponent states that the Pembina Valley water cooperative is the primary source of water and that well water is used for washing and flushing. If well water use will be above 25,000L/day a Water Use Rights License issued under The Water Rights Act is required and an application can be submitted via our online portal: https://web22.gov.mb.ca/Sso/Account/LogOn If well water use will be below 25,000L/day a Water Use Rights Licence is not required and the Water Use Licensing Section has no concerns with the project as proposed.	ECC
7	Development Plan	Site 1 The Planning Act requires that development plans include a livestock operation policy that guides zoning by-laws dealing with livestock operations. The Planning Act requires that municipalities issue a development permit before any development takes place on a site. All development must comply with the Zoning By-law and Development Plan. Any proposed development that does not comply with required separation distances or setbacks must obtain Council approval following public hearing to vary those requirements. Designation The sites of the proposed livestock operation, located in SE ¼ 8-8-6 WPM (Site 1), and SE ¼ 6-8-6 WPM and Pt. SW ¼ 5-8-6 WPM (Site 2) in the RM of Grey are all designated Agriculture Policy Area (RM of Grey-St. Claude Planning District Development Plan By-law No. 2/99). The proposals comply with Development Policies 1.3.5.1-17 (Livestock Policies).	MNR

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
		Note: Development Plan Amendment By-law No. 03/08 was approved on October 6, 2009, to allow existing operations to expand beyond 300 AU within the Agricultural Policy Area as a Conditional Use.	
8	Zoning By-Law	Site 1 The site of the proposed operation is zoned "AG" Agricultural General (R.M. of Grey Zoning By-law No. 05-2003) with a minimum site area requirement of 80 acres and a minimum site width requirement of 1000 ft. The proposed operation complies with the Zoning By-law.	MNR
		Site 2 The site of the proposed operation is zoned "AG" Agricultural General (R.M. of Grey Zoning By-law No. 05-2003) with a minimum site area requirement of 80 acres and a minimum site width requirement of 1000 ft. The proposed operation complies with the Zoning By-law.	
9	Separation Distances	Site 1 The proposed operation appears to exceed the required 1311 feet to the nearest dwelling. No variances are required.	9
		Site 2 The proposed operation appears to exceed the required 1311 feet to the nearest dwelling. No variances are required.	
10	Abandoned Wells	The proposal states that the water for the proposed livestock operation will be sourced from an existing well and the Pembina Valley Cooperation pipeline. The exact location of the well intended for use is not clearly identified in the proposal. The proposal also notes the presence of abandoned wells on the project site which are planned to be decommissioned. These abandoned wells should be properly sealed, and a sealed well report must be filed with Manitoba Environment and Climate Change, Groundwater Management Section. For information on well sealing and submission of reports, contact Manitoba Environment and Climate Change at (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. The provincial wells database indicates one well located near the center of Section 1-8-7W, which includes the manure spread field in NE1-8-7W. As the exact quarter section is not specified in the database, the proponent is expected to make a reasonable effort to identify whether this well is present within the spread field. If confirmed that no well is located on the land identified for spreading, no further action is required. Under the Livestock Manure and Mortalities Management Regulation (LMMMR), a minimum 20-metre setback from any well, spring or sinkhole must be maintained	ECC

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
		during manure spreading, or 15-metre if a permanent vegetative buffer is in place.	
11	Water Control Works	Site 1 No concerns as there are no new water control works being proposed and there is authorization for existing water control works.	ECC
		Site 2 No concerns as there are no new water control works being proposed and there is authorization for existing water control works.	
12	Manure Type and Storage: Solid and Liquid	The applicant will store solid manure as field storage (site 1 & 2). Under the Livestock Manure and Mortalities Management Regulation, the applicant must: • Locate the manure at least 100 m from any surface watercourse, sinkhole, spring, or well. • Ensure the manure does not pollute surface water, groundwater, or soil. • Land-apply the stored manure the following year. The applicant will build a new manure storage for liquid manure (site 1). Under the Livestock Manure and Mortalities Management Regulation, the applicant must obtain a permit from Environment and Climate Change prior to building the storage. Once in operation the applicant must: • 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
13	Mortalities disposal methods identified: Composting	The applicant will compost mortalities. Under the Livestock Manure and Mortalities Management Regulation, the applicant must: • Ensure the composting does not pollute surface water, groundwater, or soil. • Locate the composting site at least 100 m from any surface watercourse, well, or the operation's boundaries. • Ensure the composting facilities and process are acceptable to the director.	ECC
14	Setback Distances from Manure, Livestock, and Mortalities to Water and Operation Boundaries	Site 1 The applicant has indicated that setback distances for the new manure storage facility meets minimum requirements set out in the Livestock Manure and Mortalities Management Regulation.	ECC
		Site 2 The existing confined livestock area at Site 2 does not meet the current regulatory setbacks distance to property boundary. However, under the Livestock Manure and Mortalities Management Regulation (M.R. 42/98), confined livestock areas that were constructed prior to the regulation's amendments may continue to operate. In accordance with Section 16(5) of the regulation, the operator is responsible for ensuring that the confined livestock area does not cause pollution of surface water, surface watercourses, groundwater, or soil.	

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
15	Building in Designated Flood Areas	Site 1 This property is not within a Designated Flood Area.	MTI
		Site 2 This property is not within a Designated Flood Area.	
16	Odour control measures (project site)	Divorne Farms has indicated that dairy manure will form a crust on the manure storage located at Site 1. These crusts can act as a biofilter and reduce odours from the storage. Should odour become a problem for neighbouring residents, there is a complaints process under The Farm Practices Protection Act. 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. 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.	AGR
		Site 1 Section 116(1) of The Planning Act allows municipal councils to require a manure storage cover and the planting of a shelterbelt as conditions of approval. The applicant has indicated that dairy manure will create a natural crust. No other odour control measures are planned.	MNR
		Site 2 Section 116(1) of The Planning Act allows municipal councils to require a manure storage cover and the planting of a shelterbelt as conditions of approval. The applicant has indicated that dairy manure will create a natural crust. No other odour control measures are planned.	MNR
17	Land Available for Manure Application	The estimated land requirement for Divorne Farms is 3148 acres for the phosphorus or 3713 acres for the nitrogen, whichever is higher. Divorne Farms has satisfied the land requirement by demonstrating that they have access to 4024 suitable acres. Additional details can be found in the appendix.	AGR
		The proponent's proposed spread fields are located within the RM of Grey and the RM of Dufferin. All locations are designated General Agriculture Policy Areas and comply with the respective Livestock Policies (Development Plan 2/99 and Livestock policies 1.3.5.1-1.3.5.17). The proposed site is zoned "AG" Agricultural General Zone. The proposed use would be considered a permitted use in the AG zone.	MNR
18	Setbacks for Manure Application	Under the Livestock Manure and Mortalities Management Regulation, manure spreading must meet setback distances to all surface watercourse and groundwater features.	ECC

Related Section in the Site Assessment		Related Provincial Requirements and Safeguards	Dept.
19	Manure Transportation and Application	Please be advised that any structures placed within the controlled area of a Provincial Trunk Highway (PTH) or Provincial Road (125 ft from the edge of the right-of way) requires a permit from our office. For permit information, please email accessmgmt@gov.mb.ca or call 204-583- 2433. Permit information can also be found at https://forms.gov.mb.ca/highway-permits-application/index.html The placement of temporary drag lines or any other temporary machinery/equipment for manure application within the right-of-way of any Provincial Trunk Highway (PTH) or Provincial Road (PR) requires permission from Manitoba Transportation and Infrastructure's Steinbach Office. Please contact Robert Fender, Regional Planning Technologist, at (204) 346-6266 or Robert.Fender@gov.mb.ca. Please also notify the Regional Planning Technologist for the placement of temporary draglines or other temporary equipment for manure application within the controlled area of a PTH or PR (125 ft from the edge of the right-of-way).	MTI
		Under the Livestock Manure and Mortalities Management Regulation, the applicant must: - Operate with an annual manure management plan which includes: - Manure type, volume, and nutrient values - Spread field location and soil class - Soil tests showing nitrogen and phosphorus levels - Crops to be grown - Manure application rate - Ensure manure does not pollute groundwater, soil or escape the operation's boundaries. Follow requirements for the land application of manure, including nitrogen limits and phosphorus thresholds.	ECC
20	Manure Application on Lands Subject to Frequent Flooding or Inundation	The applicant has indicated that no spread fields are located within the Red River Valley Special Management Area or any other regularly inundated area.	ECC
21	Projected Truck Haul Routes and Access Points	Site 1 The proposed truck haul route utilizes existing Government Road Allowance which connects onto PTH 2. We have no concerns.	MTI
		Site 2 The proposed site has frontage along PR 338 with an existing access. We have no concerns.	
22	Conservation Data Centre Report	The information provided in the assessment suggest that there will not be any conflicts with species protected under the Endangered Species and Ecosystems Act and/or Species at Risk Act or designated as rare or uncommon by the Manitoba Conservation Data Centre (MBCDC). NRIF's review 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	NRIF

Related Section in the Site Assessment	Related Provincial Requirements and Safeguards	Dept.
	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.	

Provincial Departments: Agriculture (AGR); Environment and Climate Change (ECC); Transportation and Infrastructure (MTI); Municipal and Northern Relations (MNR); Natural Resources and Indigenous Futures (NRIF)

D. PUBLIC COMMENTS AND DISPOSITIONS

Public Comment Summary – Site 1	
Christie and Daniel de Rocquigny	Concerned Concerns Regarding: • The potential impacts of increased traffic on road conditions. • Safety issues around increased traffic.

Public Comment Summary – Site 2	
Christie and Daniel de Rocquigny	Concerned Concerns Regarding: • The potential impacts of increased traffic on road conditions. • Safety issues around increased traffic.
Anthony Lemky	Concerned Concerns Regarding: • Runoff that affects surrounding bodies of water and farmlands.

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. 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 the Posting Requirements outlined in Section 170 of The Planning Act.
2. Council should specify the types of operation, legal land locations, number of animals in each livestock category, total animal units, and expiration date (as per Planning Act section 110(1)) in its Conditional Use Orders.
3. As per Section 117 of The Planning Act, Council must send copies of its Conditional Use Orders to
 - a) the applicant,
 - b) the Minister (c/o the Morden Community Planning Office), and
 - c) every person who made representation at the hearing.
4. Council may impose on the approval of this a condition requiring the owner of the project site to enter into a development agreement under Section 107(1)(c) of The Planning Act. Such a development agreement may address matters including the construction or maintenance of roads or shelterbelts, at the owner's expense or partly at the owner's expense.
5. Council is 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 Change, 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 respecting an application for approval of a conditional use:
 - i. a decision to reject the application,
 - ii. a decision to impose conditions.

F. TECHNICAL REVIEW COMMITTEE MEMBERS

Name	Department	Title Branch	Contact
Holly Ervick-Knote	Municipal and Northern Relations	Senior Planner <i>Community Planning Services Branch</i>	204-945-1312 holly.ervick-knote@gov.mb.ca
Petra Loro	Agriculture	Livestock Environment Specialist <i>Sustainable Agriculture Branch</i>	204-918-0325 petra.loro@gov.mb.ca
Julie Froese	Environment and Climate Change	Environmental Livestock Coordinator <i>Environmental Approvals Branch</i>	204-945-7104 julie.froese@gov.mb.ca
Karin Newman	Natural Resources and Indigenous Futures	Habitat Mitigation Specialist <i>Wildlife Branch</i>	431-844-1625 karin.newman@gov.mb.ca
Jeff DiNella	Transportation and Infrastructure	Senior Development Review Technologist <i>Highway Planning and Design Branch</i>	204-430-7176

Appendix A

Manitoba Natural Resources and Indigenous Futures – Fisheries Branch

Fisheries Branch has reviewed the proposal. If the proponent adheres to all mitigative measures prescribed by Environment and Climate Change to protect surface waters and riparian habitats, Fisheries has no concerns with the proposal as described.

Manitoba Natural Resources and Indigenous Futures – Lands and Planning Branch

A review of the information provided suggests there is no impact to Crown land administered under The Crown Lands Act. This review is based on information known to the Lands and Planning Branch as documented in the Crown Lands Registry System.

Manitoba Agriculture – Sustainable Agriculture Branch

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

Typical, modern feeding practices for dairy were used to estimate nutrient excretion by the livestock at Divorve Farms. Ten-year Manitoba Agricultural Services Corporation (MASC) crop yield averages in the RM Grey were used to estimate crop nitrogen uptake and phosphorus 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. Detailed soil survey is available in the area to determine the agriculture capability of the land. The soil survey indicates the land contains agriculture capability Classes 2 to 5. The limitations in the area are lack of moisture (M) and wetness (W), typical of wet sands. Classes 2 to 5 are considered suitable for manure application.

The estimated land requirement for Divorve Farms is 3148 acres for the phosphorus or 3713 acres for the nitrogen, whichever is higher. Divorve Farms has satisfied the land requirement by demonstrating that they have access to 4024 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 spring and in fall, injection of liquid manure and broadcast and incorporated within 48 hours for solid manure. Injection and broadcast with incorporation will reduce the risk to surface water when compared to broadcast only application methods and spring applications are lower risk than fall applications.

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. Injection or incorporation are practices which reduces N loss when compared to broadcast only 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, 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 Grey, it is currently 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 necessary 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 6295 acres may be required for the operation. The proponent has identified 4024 acres with suitable soil test results for manure application at this time. Application to meet crop N requirements is estimated to use 3713 acres. Application at 2 times the crop removal of P is estimated to use 3148 acres (6295 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 to maximize the benefits from the P in the manure and 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.

Appendix B



12 Aviation Boulevard
St. Andrews MB R1A 3N5
Canada
T: 204-334-8846
F: 204-334-6965
dgh@dghengineering.com

July 21st, 2025

Environmental Livestock Coordinator
Manitoba Environment and Climate Change
Environmental Approvals Branch
Transmitted by email: trc@gov.mb.ca

Dear Coordinator:

Re: Response to Public Comments, TRC 12-113 Divorve Farms Ltd.

On behalf of Divorve Farms Ltd., I am responding to the public concerns raised to file TRC 12-113, and specifically, the comments from Christie and Daniel de Rocquigny submitted by email on June 12th, 2025

Divorve Farms Ltd. is conscious of the road conditions on which it conducts operations, and especially the vulnerability of dirt roads. It is in the own interests of Divorve Farms to ensure the efficiency of its operations that the impacts from these vulnerabilities be mitigated. With respect to the current and future dairy operations, a drag hose system was recently acquired to transport manure to fields for injection. This greatly reduces road traffic that can adversely impact the condition of roads. With respect to the transport of solid manure for application to farm fields, again Divorve Farms is conscious of the potential impacts to dirt roads and can adjust routing and timing of these operations to mitigate these impacts.

If you have any questions or need any further information, please contact the undersigned. Otherwise, we appreciate the livestock technical review committee's work conducted to date in advancing the interests of Divorve Farms Ltd. and look forward to completing the remainder of the process. Respectfully submitted,

DGH Engineering Ltd.

per:

Keith Duhaime, P.Ag.

cc: Bruno Divorve, divornefarm@gmail.com

July 30th, 2025

Environmental Livestock Coordinator
Manitoba Environment and Climate Change
Environmental Approvals Branch
Transmitted by email: trc@gov.mb.ca

Dear Coordinator:

Re: Response to Public Comments, TRC 12-114 Divorne Farms Ltd.

On behalf of Divorne Farms Ltd., I am responding to the public concerns raised to file TRC 12-114.

With respect to the comments from Christie and Daniel de Rocquigny submitted by email on June 12th, 2025, Divorne Farms Ltd. is conscious of the road conditions on which it conducts operations, and especially the vulnerability of dirt roads. It is in the own interests of Divorne Farms to ensure the efficiency of its operations that the impacts from these vulnerabilities be mitigated. With respect to the current and future dairy operations, a drag hose system was recently acquired to transport manure to fields for injection. This greatly reduces road traffic that can adversely impact the condition of roads. With respect to the transport of solid manure for application to farm fields, again Divorne Farms is conscious of the potential impacts to dirt roads and can adjust routing and timing of these operations to mitigate these impacts.

With respect to the comment from Anthony Lemke, submitted by email on June 11th, 2025, Divorne Farms Ltd. and the potential for run-off impacts. The RM of Lorne has committed itself to improving drainage along Road 42N to the south of Mr. Lemke's property (SW-03-008-06W1). It is also currently exploring additional drainage to the north of Mr. Lemke's property. It should be noted however that according to Bruno Divorne, there are no culverts that currently facilitate drainage from his properties to Mr. Lemke's property at SW-03-008-06W1.

If you have any questions or need any further information, please contact the undersigned. Otherwise, we appreciate the livestock technical review committee's work conducted to date in advancing the interests of Divorne Farms Ltd. and look forward to completing the remainder of the process. Respectfully submitted,

DGH Engineering Ltd.

per:



Keith Du
cc: Bruno Divorne, divornefarm@gmail.com