

Letter to:

The Clerk of the Manitoba Legislative Assembly
Premier Greg Selinger,
Hon Min of Cons, Bill Blaikie,
Hon Min of MAFRI, Stan Struthers,
Hon Minister of Water Stewardship, Christine Melnick
Hon Minister of Local Government, Ron Lemieux

RE: Bill 46, *The Save Lake Winnipeg Act*

Dear Sirs and Madam:

I would like to take this opportunity on behalf of Manitoba hog farmers and indeed all producers in Manitoba, to express our deep disappointment and utter dismay with Bill 46, *The Save Lake Winnipeg Act*.

We fully support the need to protect the environment and Lake Winnipeg. The release of our *Embracing a Sustainable Future* plan on March 16 is a strong indicator of our intention to constantly reduce our environmental footprint. We recently informed both Ministers Struthers and Blaikie that we were going to release our new *Plan P*, which will deal more directly with the phosphorous issue. We have demonstrated repeatedly our willingness to work with your government in a cooperative manner. Yet you continue to blind-side us with new and ever more draconian laws and restrictions. We cannot understand how you can consistently blame hog farmers for polluting the lake. It is absolutely without merit.

We have been under continuous attack by your government for more than 10 years, and I fail to understand why. You have passed at least 28 pieces of legislation and regulations that have negatively impacted hog farmers! Your government changes them over and over again before we can even understand and meet the last sets of rules (see attached list of regulations and legislation). We haven't had time to make the required changes, let alone to see the results on the landscape.

One of the most infuriating things about this total ban on new hog production is the unfairness of it all. You have not treated any other group in Manitoba with the same mean-spirited tactics. For example, while the City of Winnipeg contributes several times more nutrients to the lake than the hog industry (including numerous major spills of raw sewage every year directly into the rivers), You haven't banned all new buildings in the city the way you have in the hog sector. While you may have restricted fertilizers on golf courses, you haven't banned all new golf courses the way you have banned hog barns. While failed and leaking septic fields in the Selkirk corridor are pouring raw sewage directly into the Red River, you haven't banned new buildings or new septic fields in the Selkirk corridor the way you have with hog buildings (you only put forward a weak restriction limiting fields to 2 acres each).

There is simply no credible science showing Manitoba hog farmers are adding any significant nutrients into the lake. Certainly the small amount of nutrients we may contribute does not merit the measures taken against us. The Leavitt Report brought out by your government last week, bases its conclusions on a mere three lake bottom core samples taken five years ago. It then attempts to draw a correlation between an increase in nutrient loading in the lake and the increase in hog production, but without any actual evidence showing how they connect - mainly of course, because there is no evidence! Credible science attempts to provide evidence proving a correlation, it does not simply imply that there must be one. The portion of the report attempting to link livestock and hogs to excess nutrient loading in the lake is extremely poor science, and I truly hope this is not the foundation of your decision. We have consistently asked your government for any real science, any evidence to show how we are polluting the lake, but we have yet to see any. In fact, the science that is in place shows the opposite and that at most, hog production contributes about 1.5% of the nutrients to the lake (compared to general agriculture at 15% and the City of Winnipeg at 6%).

The irony is that our most recent proposed alternative (the “Zero Percent Solution”) would actually go much further toward your purported goal of preventing soil phosphorus from affecting the quality of our waterways. Stopping farmers from building new structures will have no impact on water quality. As we have stated before, you could fly every pig in Manitoba to the moon tomorrow, and it would have almost no impact on Lake Winnipeg, largely because farmers would replace their natural, organic manure fertilizer with artificial fertilizer.

Without banning new structures in all of Manitoba, our Zero Percent Solution would effectively prevent expansion in areas of over concentration, while still allowing expansion in areas where it is reasonable to do so, especially since, according to the experts, the hog industry has a minimal effect on Lake Winnipeg in the first place. Every expert we have talked to agrees that good nutrient management and better water management are the REAL answers to preventing surface water contamination. A ban on structures does not even begin to deal with the issues.

Regulations already in place would prevent any excess build-up of nutrients from new operations anyway, making this ban even more pointless.

We estimate that about 88% of producers now inject and/or incorporate hog manure into the soil. This means almost none of the hog manure applied this way can run off. The remaining farmers are almost entirely small producers and apply relatively little manure. Therefore, there is now VERY little overall runoff of hog manure into waterways.

Manure is a valuable, organic, natural source of fertilizer. It is not waste. By applying manure as a fertilizer, growing a grain crop and feeding the grain back to pigs, we actually keep the phosphorous in a closed loop, known as the Nutrient Cycle. This is not the case with artificial fertilizers. In England, manure is considered so valuable that farmers pass down manure rights in their wills. In Minnesota and Iowa, which have about six times more hogs than Manitoba, hog manure is a valuable commodity and its sale is a major source of income for farmers – sometimes exceeding the value of their pigs. Yet here, it is treated by some like it is nuclear waste. Even the 2007 CEC Report stated that “*manure [should] replace synthetic fertilizers as much as possible.*” (Page 90 of the report).

Likely the real problem related to nutrient over-loading in the lake is spring runoff and proper water management. The vast majority of nutrients enter waterways and ultimately the lake in times of high water (spring and early summer), so the key to stopping most nutrients from entering the lake is to better manage water. But that of course is difficult, complex and expensive. Apparently it is much easier to attack farmers and put them out of business than to actually do something real to protect the lake.

You will not “save Lake Winnipeg” with this bill, but you will kill a billion dollar industry which currently employs approximately 11,000 people in Manitoba. I can only conclude that we have too much employment in Manitoba and therefore can afford to lose that many jobs.

In that light, you must realize that you are putting the processing plants in Brandon and Neepawa at serious risk because of this nonsensical ban on hog farms. As well, the secondary processing plants in Winnipeg will also be at risk. These plants employ more than 3500 unionized workers in the province (many of them new immigrants), and as hog production decreases (as it now must, since farmers naturally exit the industry because of retirement or for economic reasons and they cannot be replaced), these plants will not be able to get enough hogs. They will either have to import hogs from the USA and Saskatchewan, and/or they will consider moving out of the province. In fact, as a result of Bill 17 passed by your government in 2008 (the partial ban), those plants are already at risk of not being able to access a full supply of hogs. Apparently you haven't considered the other implication of this legislation, which is that you could very likely force the importation of American hogs and/or the closure of the largest food processing plants in Manitoba – accounting for about one-third of all food processing in Manitoba.

Manitoba farmers are good stewards of the land and were the original environmentalists. While we may not be perfect, we continue to improve our practices to feed the world and make it a better place in which to live. We live here and have families here. We enjoy the beaches of Lake Winnipeg too. We want to continue to improve, but Bill 46 will kill the industry and stop it from making any substantive improvements.

Bill 46 is a purely political action. While I understand that governments often feel the need to pass legislation and regulations that are mainly intended to make them look good politically, I do not understand it when such actions purposefully harm thousands of citizens in Manitoba, while helping no one - simply to gain a few short term political points.

In conclusion, dealing with your government on these issues has been an extremely frustrating and draining experience for us. While many producers have expressed to me their deep personal disappointment in your government, more have expressed a real disillusionment with the political system in general, in particular the cynicism and dishonesty this bill represents. They have asked me why the government will not listen to reason, and I have no answers for them.

Still, farmers are eternal optimists, and so again, we respectfully urge you to reconsider this legislation. It is never too late to do the right thing and properly address the issue. Please amend this bill and remove the ban on hog facilities.

As always, I am available any time to discuss this matter with you.

I am attaching additional information to this letter which addresses this matter in more detail.

Yours sincerely,

Karl Kynoch
Chair

Copy to:

KAP,
DMs & ADMs of: MAFRI, Conservation, Water Stewardship, Local Govt