

Additional Information to Accompany Request for Authorizations

Respecting Manure Treatment Systems

Pursuant to Section 6(1) of the *Livestock Manure and Mortalities Management Regulation (LMMMR)* (M.R. 42/98), a permit issued by Manitoba Conservation and Water Stewardship is required for the construction, modification or expansion of a manure treatment system.

Proponents intending to construct, modify or expand a manure treatment system shall, along with a permit application, submit information to demonstrate that: 1) the end products of treatment can safely be applied to agricultural land; and 2) there will be no discharge to surface water features or burning of (treated or untreated) manure.

Approval or identified deficiencies of submissions in no way constitute an endorsement of the treatment systems or a lack thereof. The submissions are intended to enable proponents to show how the environment will be adequately protected and that legislative requirements could be achieved. The regulation requires that operators shall maintain and operate the treatment systems to avoid pollution and in a manner that sustains their structural integrity.

The submission should discuss the following:

- What is the technology? Is it an active mechanical process or other process? If other, explain. Is it an anaerobic digestion system? Describe all phases if there are multiple phases. Provide specifications.
- Will treatment result in separation or dewatering of manure into components with differing moisture content? What are the end uses of the components of the treated manure?
- How will the components be stored until they are land applied to ensure regulatory compliance? What is the contingency plan for manure storage and management in the event that the technology is not able to process the manure?
- Are any additives, for example, flocculants and/or chemicals intended to be used? If so, the submission must provide a description and a professional's opinion to confirm that all treated manure components are suitable for land application as a crop fertilizer without negatively impacting the environment or human health. If information is not available, other authorizations and testing may be required.
- Will the treatment improve efficiency and cost of long distance transport of nutrients that are surplus to crop needs in your area?
- Although it is not mandatory, proponents may also comment on greenhouse gas emissions, water usage, chemical processes, injection/incorporation during application and water recycling as part of the submission.

Will other approvals be required?

The *Livestock Manure and Mortalities Management Regulation* specifies that all manure (including treated manure) must be applied to agricultural land and accounted for in any required manure management plans. The requirement for an Environment Act Licence, administered under *The Environment Act*, would be determined based upon conditions described in a proposal to construct, modify or expand a manure treatment facility.

The Environment Act outlines the environmental assessment and licensing process for developments in Manitoba that may have potential for significant environmental and / or human health effects. The process exists to ensure environmental and human health protection, encourage early consultation, allow for full public participation, and ensure economic development occurs in an environmentally responsible manner.

The Classes of Development Regulation lists the types of projects which are defined as developments. Developments must undergo the environmental assessment and licensing process and receive an Environment Act Licence prior to construction.

Examples of situations where an Environment Act Licence could be required include (but not limited to):

- Treated manure is sold as organic fertilizer or distributed through a retailer
- A treatment facility that generates electricity (for on farm or off farm use) such as an anaerobic digester
- A treatment facility that would be considered an industrial or manufacturing facility as a result of producing a product
- A treatment facility that releases emissions and/or particulates as a result of producing a product
- A treatment facility that accepts any product or waste not generated by the livestock operation (such as food industry waste, organics etc.).

Manure treatment that may have the potential for significant environmental impacts or human health effects will require an Environment Act Licence. For staff to assess what approvals are required, please elaborate on exactly what will be treated and where all treated products will be directed.