

Subject: Revised Mink Regs
Date: Wed, 22 Feb 2012 16:53:02 -0800
From: jwerring@davidsuzuki.org

FYI, I am sharing this with you because we have dialogued in the past on this important issue.

I have just received a copy of the revised Fur Industry Regulations (see attached) proposed by the government of Nova Scotia and I am quite dismayed with this version of the regs. Obviously industry induced a lot of pressure on government and got a lot of concessions. I am afraid the way these regs are written it is just going to shift the problem around and they offer too many loopholes.

My main concerns are:

- * There is no longer any requirement to monitor groundwater or sample ground water to determine if it is/has been contaminated with manure (or the nitrogen or phosphorus from manure).
- * This version of the regs allows for land application of manure from fur farms as an acceptable means of disposal.
- * This version of the regs allows for on farm disposal (which could mean burying) of both feed and carcasses (whereas the previous version prohibited this).
- * Covered solid waste storage facilities are no longer required to have minimum separation distances from surface watercourses - see Table A (see next bullet!!)
- * There is a new section (15(g) - see page 13 of 20 that reads: "animal housing buildings traditional style sheds to be considered as solid manure". Does this mean that the plan is that the actual animal housing buildings will be considered to be acceptable manure storage facilities????
- * Where it comes to contamination of surface waters, operators are now only required to "address minimizing mixing of potential surface water with waste" ("potential" surface water logically means runoff!!) where before they were required to contain surface runoff, construct a surface water treatment system and monitor the discharge from said system. In this version of the regs, any reference to surface water collection, storage or treatment systems has been removed.
- * While operators are required to identify surface runoff directional flow and discharge points, THEY ARE NOT REQUIRED TO SAMPLE surface runoff. They only have to "minimize potential mixing of it with waste!"
- * Operators are only required to sample surface waters in identified flowing watercourses (e.g. streams ...) if those waters are within the minimum separation distances set out in Table A. What about wetlands? What about ditches?
- * The new version refers to random tests of water samples to, wit: "Where the random tests conducted in clause 19 (f)" (see page 18 of 20, Section 20 (Reporting Requirements) subsection 3 - but the only allowance for this is to sample surface water discharges - which are NOT defined!
- * Maximum allowable total phosphorus concentrations (20 micrograms per litre) in surface waters is

still way too high - should be <10.

* Maximum allowable E coli levels are too high and only for flowing waters. The proposed level is the Canadian swimming standards. Should be standard for drinking water ... 10 cfu/100ml

* Finally, the definition of a "Designated professional is too restrictive ... they should expand the definition to include:

1. Certified Engineering Technicians and Technologists (management plans, laboratory analyses)
2. Architects (building design to take the health of neighbors and animal welfare into account)
3. Veterinarians (animal welfare matters)
4. Land Surveyors (development of management plans)
5. Planners and Landscape architects (management plans, waste storage facilities)
6. Geoscientists (surface and ground water movement, ground permeability) and,
7. Agrologists (soil science, soil studies, nutrient loading capacity from land disposal of manures)

Also, if land application of manure is to be allowed then there needs to be a plan for assessing the receiving land's capability/capacity for nutrient loading (how much phosphorous or nitrogen can it take/absorb), a requirement that any manure that is spread on land has to be treated to kill viruses and bacteria; a requirement that there should be minimum separation distances specified for all watercourses/water bodies; and, should specify some kind of active surface water monitoring program near the disposal sites!!!

Some positive aspects ...

- * They will require new "closed style" animal housing for new farms and for renos and re-builds on existing farms.
- * Total phosphorous has been reduced from 100 ug/l to 20 ug/l
- * They added E coli as a water contaminant to be measured

John