



***Viking Fur Inc.***

160 Main Rd., Cavendish, NL A0B 1J0

November 10, 2014

Honourable Vaughan Granter  
Minister  
Department of Environment and Conservation  
4<sup>th</sup> Floor, West Block  
Confederation Building  
St. John's, NL  
A1B 4J6

Dear Minister;

I have attached an Environmental Assessment Registration to establish a mink farm on two Agricultural Crown land leases, located adjacent to Argentia Access Road, about 10 kilometres south of the Trans Canada Highway. Over the past 12 years Viking Fur Inc. (Viking) has invested approximately \$10 million in the development of a fully integrated mink farm, which includes the manufacture of mink feeds from materials which are waste products to other industry, notably the poultry sector, aquaculture and the traditional fishery.

In the past year, the Company has invested approximately \$2.1 million into improved waste management systems at its farm in Cavendish. This Argentia site would include a waste management system based on the latest technologies to ensure the farm exceeds Government requirements to minimize environmental impacts. The farm will have sufficient land base to manage manures in an agronomical and environmentally acceptable manner.

The establishment of a farm on the Argentia Access Road would allow Viking to minimize out of Province sales of mink feed and as a consequence, increase production, value and employment opportunities in rural parts of the Province.

As required, I have attached a cheque for \$226.00, a digital copy (USB) and ten paper copies of the registration. I trust everything is in order, however if you or your staff have any questions, please contact me at our address.

Thank you for your consideration of Viking's proposal.

Sincerely;

Peter Noer  
President  
Viking Fur Inc.

**Viking Fur Inc.**  
**160 Main Road**  
**Cavendish**  
**NL**  
**A0B 1T0**

**Name of Undertaking:**

Argentia Access Road Mink Farm

**Chief Executive Officer:**

Peter Noer  
President  
c/o Viking Fur Inc.  
588-2820

Principal Contact Person for purposes of environmental assessment:

As Above

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## **The Undertaking**

Viking Fur Inc. proposes to construct a mink farm on an existing farm, located adjacent to the Argentia Access Road, route 100, south of the Trans Canada Highway. The intent is to develop the farm in three phases from 5000 female breeders in 2015 to 15,000 breeders in 2020.

Viking currently manufactures more mink feed than required at its existing farm at Cavendish, Trinity Bay as a result of contractual obligations with its principal supplier of raw product. The proposed site on the Argentia Access Road would allow Viking to use this feed for its own production thereby eliminating its reliance on out of Province sales of mink feed.

Viking Fur Inc. proposes to develop the farm with the best available technology and in particular the construction of a closed manure management system whereby manure is removed from under the cages by a gutter to a manure storage. This system has been adopted by virtually all farms in Denmark and increasingly popular in Ontario as an efficient, environmentally preferred means to manage manure and waste water. The system minimizes odours, flies and the presence of seagulls.

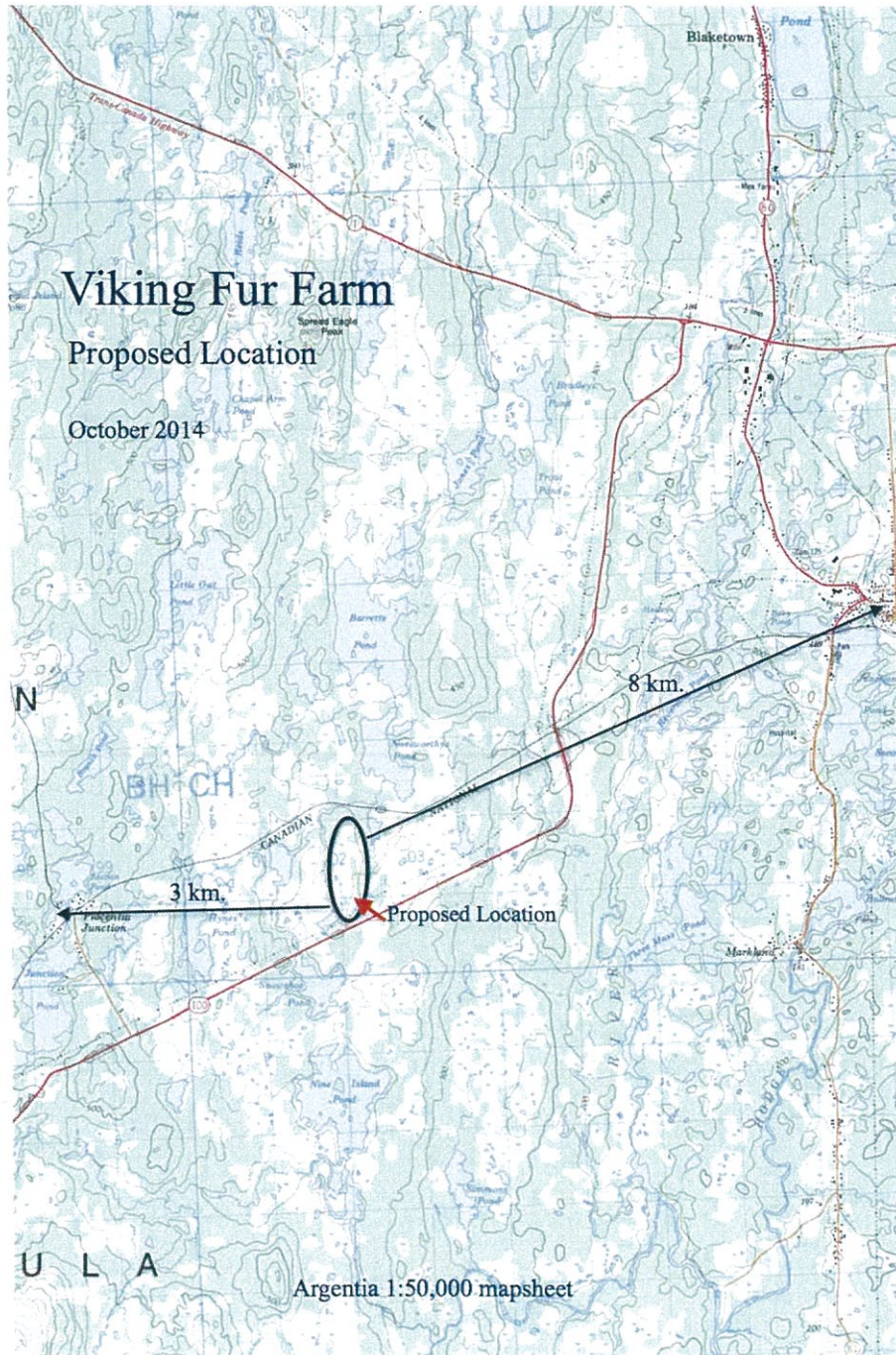
The company's vision is to be an efficient producer of high quality mink for the benefit of the owners and employees while being a respected contributor of the community. Based on the strength of the company's existing infrastructure, notably feed production facility, knowledge and employees, it is the company's mission to expand the farm in an environmentally, economically and socially sustainable manner to benefit of the farm, the existing employees and the anticipated 20 new positions and 15 part time positions, which would be created with the establishment of the farm.

### **Geographical Location:**

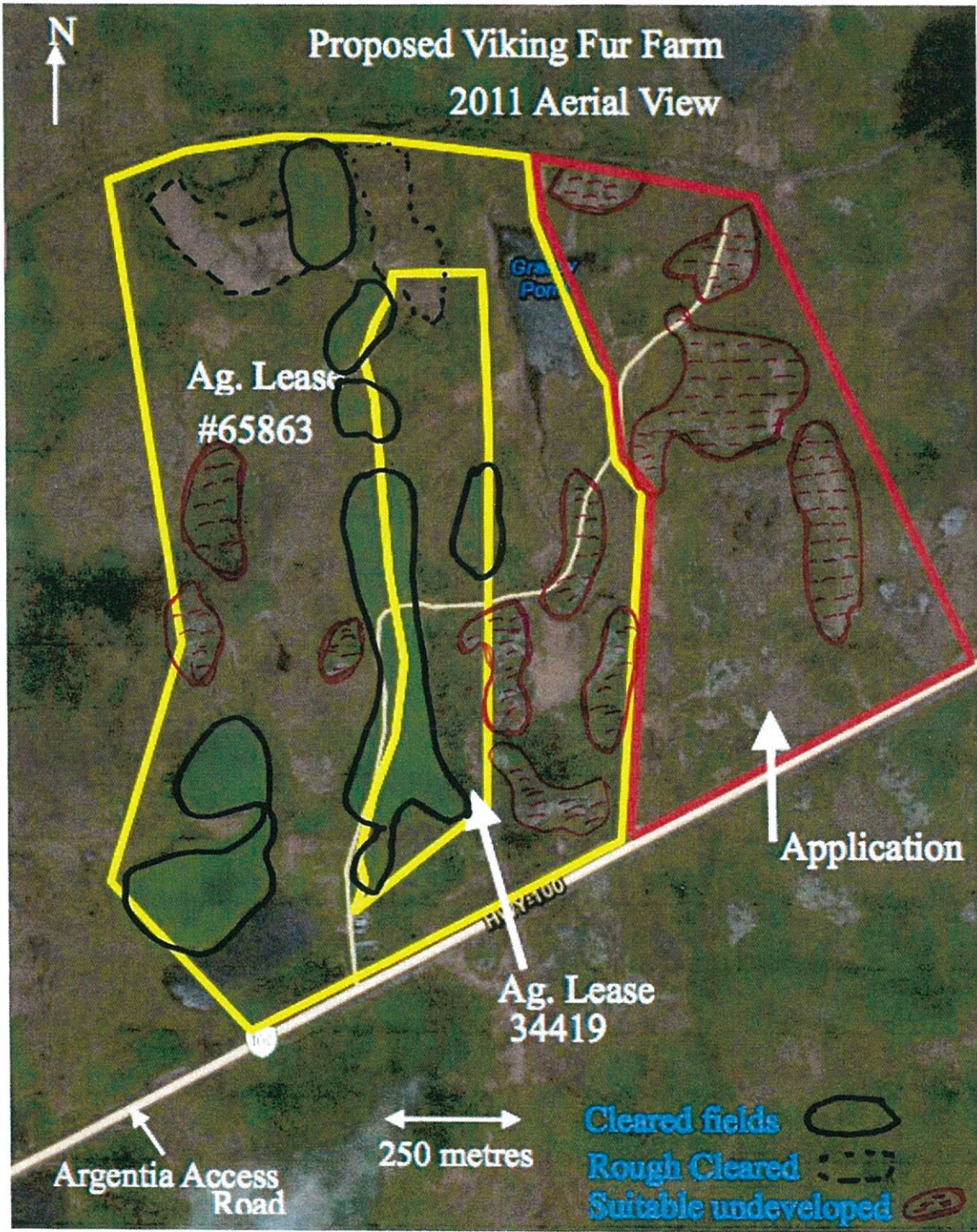
The proposed site is located about ten kilometres from the Trans Canada Highway, on the north side of the Argentia Access Road as illustrated on the attached 1:50,000 map on page 4. The aerial photograph, page 5, provides a detailed view of the location along with information related to the existing and potential use of the land. Appendix A shows the layout of sheds and manure storage.

# Location Map

## Viking Fur Farm



Crown Land Leases; Land Use



## Physical Features:

The three phases of the development would consist of the construction of sheds in 2015, 2017 and 2020. The dimensions of the sheds would vary in respect to the shape of the landforms, however the surface area of the sheds would be reflective of industry standards for the rearing of mink. In addition, a manure storage would be built in the immediate vicinity of the sheds. An existing residence would be used as a staff and lunch house with sleeping accommodations.

The existing sheep farm, Agriculture Crown Land Leases, 65863 and 34419, identified on page 5, is served by an access road and electrical power. These Agricultural Crown Land Leases consist of a total of approximately 115 hectares and have a southerly/northerly orientation from the Argentia Access Road. Approximately 55 acres have been cleared for farm purposes of which about 10 acres require renovation through the removal of stones, cultivation, fertilization and seeding. It is estimated an additional 30 acres of forested and barren land could be developed for hay production. The map illustrates the location of cleared, active farm fields, areas which are rough cleared and landforms which are suitable for farm development.

In addition, Viking has applied for 125 acres of Crown Land (previously leased for farm purposes) immediately east of the sheep farm of which 30 acres could be developed for hay production as illustrated in magenta on the land use map on page 5. As summarized below, approximately 115 acres, of which 45 acres are currently used for pasture and forage production, are available for farm use on the two existing leases and the expired lease under application. This existing farmland and the arable undeveloped land is located within a kilometre of the proposed location for the sheds.

### Land Base

Property	Crown Lease 65863 and 34419	Expired Crown Lease (under application)	Total Land
Total Area	284 acres	125 acres	409 acres
Existing farmland	45 acres		45 acres
Suitable for renovation/development	40 acres	30 acres	70 acres

The topography of the general area consists of mineral soil ridges and organic (bog) deposits.

A fence would be constructed around the sheds to eliminate the opportunity for mink to escape or for other animals to enter the farm.

## **Construction:**

### **Schedule**

- **Late winter/early spring 2015:** Minor improvements to existing farm roads would be completed on the existing leases. The site would be prepared to accommodate the sheds.
- **Spring/summer 2015:** Construct: Mink Sheds (install cages, gutters, water systems, electrical and manure storage. Place breeders in sheds.)
- **Fall of 2016:** Construct Mink sheds
- **Winter 2017:** Outfit sheds; Place breeders in the sheds
- **Fall 2019:** Construct Mink Sheds
- **Spring 2020:** Outfit sheds. Place breeders in the sheds

Construction would involve typical construction activities. Fuel for heavy equipment would be transported to the site where it would be pumped to existing on-farm licensed fuel storage. Absorbent pads or peat-based products would be kept on the site to clean any spills. All construction debris would be removed on a regular basis.

Any merchantable wood would be salvaged. Non-merchantable vegetation would be burned at the site.

The existing agricultural land base would be used to grow forage (hay) in accordance with the recommendations of the Agrifoods Development Branch. Riparian areas, as discussed, would be protected. As illustrated in Appendix A, the sheds would be located on an existing farm field, approximately 125 metres from a pond. A 15 metre buffer would be maintained between the sheds and an intermittent stream which flows in a northerly direction from the pond. This would comply with Provincial and Federal requirements for the protection of water courses and would ensure fish populations would be protected. There is a second water course which is located more or less parallel to the eastern boundaries of the existing leases. There is minimal land suitable for farm purposes near the brook, however any development would maintain a 15 metre vegetated buffer between the water course and farm use.

## **Operation**

The site is located in the Whitbourne Agriculture Development Area, (ADA) which was established in the early 1980s to protect land of agricultural importance and to facilitate the expansion of the industry. The ADA includes a substantial portion of



the Province's poultry industry, including a layer (egg) farm east of Whitbourne and broiler (chicken) farms in Whitbourne.

The farm would raise mink in the sheds, with an aim of increasing kit production, based on 4 to 5 kits per breeding female, as follows:

2015/16:	20,000 to 25,000 kits annually	
2017/19:	40,000 to 50,000 "	"
2020:	60,000 to 75,000 "	"

There would be approximately 750 square metres of shed space for each of the three phases of development.

The mink feed would be shipped daily to the farm from Cavendish, throughout the summer and fall and every three days during the winter when there would be fewer animals on the farm. The storage shed would include sufficient refrigeration to store the feed. The transportation of mink feed would be done in secured, sealed plastic "fish tub" containers. The shipping of mink feed is a common practice in several locations in the Province with no known environmental impact.

The animals would be pelted at Viking's operation in Cavendish where the carcasses would be composted within a building which was constructed to facilitate successful composting in a controlled environment. The controlled system allows the company to monitor the composting process and in particular the mix of organics, temperature and moisture. The mature compost, odourless, would be spread on farm fields as stated in Viking's Environmental Certificate of Approval issued pursuant to the *Environmental Protection Act*. Viking has determined the facility is large enough to manage additional pelts produced on the Argenta Access Road. Regardless, whereas Viking proposes to develop the farm in three stages, there will be ample opportunity to monitor the composting of additional carcasses. Annual production of mature compost will, at a minimum, be removed on an annual basis.

The most important environmental consideration in the operation of livestock farm is the management of excrement (primarily manure) and wastewater. The proposed system would minimize the likelihood for water pollution, odours and flies.

Viking's manure management system would include the following:

- Gutters located under the mink cages would remove the mink excrement and water on a daily basis to an impervious manure storage. This would minimize conditions favoured by flies as manure and moisture would not be deposited on the ground.
- Viking will spread manure on the existing Agriculture Crown land leases. Combined with the acquisition and subsequent renovation of the expired

Agricultural Crown land lease, the farm will have sufficient land to spread manure should the farm expand as proposed.

- Manure spreading will be done in accordance with the Province's: Environmental Farm Practices Guidelines for Livestock Producers in Newfoundland and Labrador, 2001, (2001 Guidelines) Best Management Practices for Fur Farms, 2007 and regulatory requirements of Provincial and Federal Environmental Agencies which will be stipulated in the Crown Lease indentures and the Company's Environmental Certificate of Approval as prepared by the Provincial Government. These requirements will ensure manure will not enter water courses or contaminate groundwater. In addition, these practices will minimize farm odours.
- The 2001 Guidelines state there are 150 breeding females per animal unit. Therefore, at 15,000 female breeders, Viking would have 100 animal units once fully developed. Based on the 2001 Guidelines, the farm would need an acre of farmland for each animal unit. As a result, the farm will need 100 acres (40 hectares) of farmland for manure spreading. Agriculture Crown Land leases, 65863 and 34419 and the former Crown Agriculture Lease, as explained on in Table 1, page 6, include approximately 115 acres of farmland and arable, undeveloped land.
- Impervious storage for manure and waste storage will be constructed concurrent with shed construction. The size of the storages will be based on approximately 0.65 cubic metres of waste per breeding female. Approximately two thirds of the manure will be produced between mid May and late October.

In addition to the manure, limestone would be spread on the land to improve the efficiency of natural fertilizers. Soil assays would be completed on a regular basis to ensure soil fertility is at a level for productive plant development. A nutrient management plan, which would be developed based on the actual soil fertility of the land base and nutrient values of the manure, would be completed to meet agronomic and environmental requirements. eg. Sufficient manure to efficiently grow the crop while ensuring yearly spreading is sustainable and will not leach into ground or surface water.

In planning this proposed development, it was necessary the farm be located in reasonable proximity to the Cavendish farm to facilitate regular shipments of feed and to benefit from the knowledge and expertise of the farm's workforce. In addition, whereas Separation distances between farms and residential areas are recognized as an important consideration in the planning of a livestock farm; the farm is located approximately eight kilometres from Whitbourne, 14 kilometres from Blaketown and 3 kilometres from Placentia Junction. These distances exceed Government requirements for separation distances of 1.4 kilometres between new

mink farms and residential areas. The distance between the farm and the residential areas, combined with the implementation of the Environmental Guidelines, Best Management Practices and regulatory requirements would minimize farm odours. It is also noted that Placentia Junction, the closest area of residential development is up wind of the farm. The prevailing southwesterly winds blow away from Placentia Junction. The considerable distances combined with the proposed manure handling system and the spreading of manure when weather conditions are appropriate, would minimize the likelihood of downwind farm odours when manure is spread. The map in Appendix B illustrates the land use in the area, from the existing sheep farm (proposed Viking site) to Placentia Junction. In between the farm and Placentia Junction, exists land which has been issued/used for farm purposes. As stated this area was established as an Agriculture Development Area and is one of the few rural/agricultural areas remaining on the Avalon Peninsula.

In 2013, the National Farm Animal Care Council, developed a Code of Practice for the Care and Handling of Farmed Mink. The Code was developed to promote sound management and welfare practices for housing, animal care, transportation and other animal husbandry practices. In particular, the Code requires minimum cage size, access to fresh water, proper ventilation for all seasons and appropriate practices for euthanizing the animals. Viking would comply with the Code.

## **Occupations**

Fifteen to twenty people will be involved in the construction of the farm. Operational requirements would increase as the farm expands, with close to 20 full time employees when completed in 2020. In addition, part time employees would be hired in the breeding and pelting seasons. A farm manager would be hired to oversee the operation of the farm.

Construction would include heavy equipment operators, carpenters and labours. The operation of the farm would include farm labour responsible for general farm operations, notably animal husbandry, daily maintenance/cleaning of sheds, feeding and the administration of medications. In addition, workers would use a range of farm equipment, such as farm tractors and associated equipment.

### **National Occupational Classification Government Title Code**

7611	Construction Trades Helper and Labourer
7411	Truck Driver
7271	Carpenter
2154	Land surveyor
7421	Heavy Equipment Operator
8431	General Farm Worker

Viking is committed to employment equity as proven at the existing farm in Cavendish where there has been a ratio of 50% male /female has been maintained over the past few years. The company has also hired visible minorities. The construction of the farm would include the usual range of trades, notably carpenters, electricians, heavy equipment operators, surveyors and truck drivers. The actual operation would depend on general farm workers (15) truck driver (1) and managers (3) Trades would be required for on going maintenance. Additional part time farm workers would be hired during busier times of the year.

### Approval of the Undertaking

The following is an outline of the main permits, licenses, approvals and other forms of authorization required by Government Departments and Agencies.

Crown Lands Branch	Crown Lands Application (subsequent referrals)
Service NL	<ul style="list-style-type: none"> <li>a) Development Control Regulations (Road access approval; development approval required as the development is within 400 metres of the highway)</li> <li>b) Electrical permits</li> <li>c) Septic system</li> <li>d) Environmental Certificate of Approval</li> </ul>
Forest Resources Branch	<ul style="list-style-type: none"> <li>a) Permit to burn</li> <li>b) Permit to cut merchantable wood</li> </ul>
Department of Transportation	Sight lines (existing access)
Provincial Water Resources Branch	Impact on water courses
Federal DFO	Impact on fish habitat
Municipal	N/A

The referenced agencies will be referred through the Crown Lands referral process for the Crown land application. In addition, Service NL will refer the proposal for comments as the development is within 400 metres of the Argentia Access Road.

### Schedule

It is the Company's aim is to prepare the site for building construction in early spring. The initial phase of shed construction would be completed by July 30, 2015. Manure management and containment systems would be operational before mink are placed on the farm. Existing roads would be upgraded to handle more and heavier equipment.

## **Funding**

The Company will apply for financing through farm development programs administered by Government and lending agencies.

*November 10/14*

**Date**

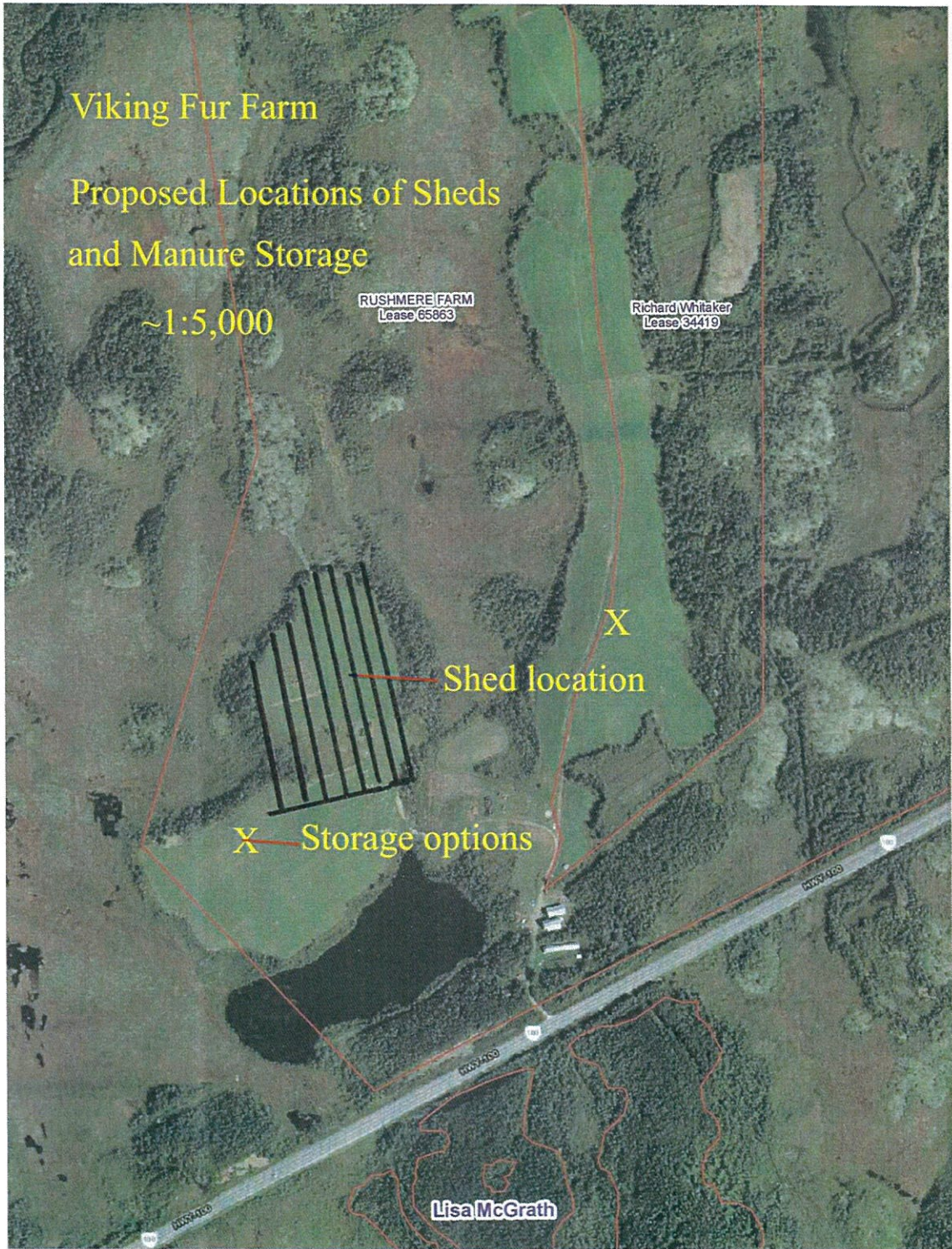
*Peter Noa*

**Signature of Chief Executive Officer**

***November 10, 2014***

Appendix A

Layout of Sheds and Manure Storage



Appendix B  
Land Use Argentia Access Road

