



## KEYSTONE AGRICULTURAL PRODUCERS

May 30, 2025

### **Legislative Improvements**

Dear Premier Kinew:

Keystone Agricultural Producers (KAP) is Manitoba's general farm policy organization, providing a unified voice for farmers on issues that affect agriculture. KAP represents and promotes the interests of all Manitoba farmers and 20 commodity associations.

Manitoba producers find themselves in a changed geopolitical reality. The United States and China have imposed tariffs on billions of dollars worth of Canadian goods. And Canada has substantial tariffs on Chinese and American goods. Our long-standing trade relationship with America has come under scrutiny. Farmers have always faced uncertainty regardless of the commodity produced, but the current tariffs have created further uncertainty—an uncertainty that farmers have no control over.

Because our sector relies heavily on Chinese and American buyers, the action taken by government matters. We appreciate your support of the agricultural sector and your willingness to implement our recommendations highlighted in our January 31 and February 20 letters. In addition to our previous recommendations, we would like to provide more targeted recommendations (i.e., low-hanging fruit) that would benefit Manitoba producers as a follow-up to our March 28 meeting with the Premier's Policy Secretariat. Below are the recommendations.

#### Inspection and Technical Services Bulletin # 22-002

Propane has many uses for farmers and federal and provincial regulations govern its use. Recently, Inspection and Technical Services made changes to propane storage affecting 10,000 USWG tanks. KAP and the Canadian Propane Association have been working together on this issue as it affects users throughout the supply chain. Installation now requires a Risk Evaluation, Response and Mitigation Plan (RERMP). The RERMP does overlap with the federal Environmental Emergency Plan in several areas, and the provincial plan has requirements that may be impractical (i.e., not reflecting current industry practices). Duplication makes little sense. We recommend that government update the Inspection and Technical Services Bulletin # 22-002 to better reflect farmer and industry's needs.

#### Efficiency Manitoba Act

Efficiency Manitoba's programs have brought energy use cost savings to many Manitobans, including farmers. But the Efficiency Manitoba Act only covers electricity and natural gas. Farmers without natural gas access can ask Manitoba Hydro for a line extension, but line extensions are both costly and time-consuming. Approximately 4,200 Manitoba households use propane—many of whom are farmers. Propane's portability, accessibility, cost-effectiveness, and versatility make it ideal for household heating, grain drying, and livestock heating. Because Efficiency Manitoba's programs focus on electricity and natural gas savings, farmers using propane are ineligible for certain programs. We recommend that government include propane in the Efficiency Manitoba Act to increase farmer program participation while reducing greenhouse gas emissions.

### Manitoba Public Insurance – Off-Road Vehicle

Off-road vehicles (ORVs) are commonly seen on Manitoba farms. ORV use can vary on farms: checking fences, crops and livestock, herding livestock, and moving materials. All ORV users must register their machine with Manitoba Public Insurance. But the Off-Road Vehicles Act allows for a registration exemption if the ORV solely operates on private property. While this exemption does benefit farmers, it lacks practical use. Farmers no longer occupy quarter sections. Rather farm sizes range from a few dozen acres to thousands of acres occupying sections that may not be adjacent to one another. Outstretched farmland means farmers will cross roadways, ditches, and other rights-of-way while operating ORVs. We recommend that government provide a registration exemption for farmers using their ORV solely for farm purposes.

### Oversized Loads

Farmers operating oversized equipment near powerlines require an annual permit from Manitoba Hydro. Depending on the tow route taken, farmers may require an additional permit from Manitoba Transportation and Infrastructure. Requiring two separate permits for one tow route is neither a simple process nor time efficient. While Manitoba Hydro offers an online permit application, Manitoba Transportation and Infrastructure does not. Farmers value a simple and timely application process. We recommend that government create a single online application for oversized agricultural loads involving provincial roads and Manitoba Hydro property.

### Manitoba Building Code

Every five years the Canadian Commission on Building and Fire Codes provides an updated National Building Code (NBC). The National Building Code aims to create consistency across Canada regarding building design and construction. But provinces can accept or reject portions of the NBC to suit their local needs. And provinces do just that. Both Alberta and Saskatchewan exempt farm buildings from their provincial building codes—Manitoba does not. Instead, Manitoba adopts the NBC and provides specific exemptions for farm buildings. We have concerns that these exemptions place Manitoba at a competitive disadvantage compared to the other prairie provinces. We recommend that government align with Alberta and Saskatchewan and exempt farm buildings from the Manitoba Building Code.

### Service Standards

A common concern that we hear from Manitoba farmers involves government service delivery performance. As with any business, producers rely on timely decision-making from all parties, including government. Examples vary, but the central concern involves the waiting period for a government decision: (1) the waiting period for a grain dryer inspection; (2) the convoluted governance structure between rural municipalities and Environment and Climate Change involving tile drainage applications; (3) the waiting time required for minor water control work approval; (4) the requirement to file a refund request for list “D” goods exempt from the retail sales tax; and (5) the limited-service standard wait times posted on the government’s website. We recommend that government consider the highlighted issues and strive toward improved transparency, timeliness, and decision-making.

Thank you for considering the topics raised in this letter. If you have any questions about this letter, please contact KAP policy manager, Neil Van Overloop, at [neil.vanoverloop@kap.ca](mailto:neil.vanoverloop@kap.ca).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Colin Hornby', with a large, stylized flourish at the bottom.

Colin Hornby

General Manager, Keystone Agricultural Producers Inc.

CC:

Jeanette Sivilay, Director of Policy

Brenda DeSerranno, Deputy Minister of Agriculture