

# Understanding the differences between manure application planning, recordkeeping, and reporting

Proper manure application planning maximizes the benefits of manure while minimizing the costs and impacts on the crop production system and the environment. Keeping records of manure application activities not only aides in the planning process the following year but also documents the application process for compliance purposes. Feedlots with a National Pollutant Discharge Elimination System (NPDES) or State Disposal System (SDS) permit, must submit land application records as part of the yearly annual report to the MPCA.

## Manure management plans (MMP)

A MMP looks into the future to identify the location and rate for manure applications. A MMP illustrates how manure is going to be utilized during the upcoming cropping year to maximize the nutrients from manure and yet protect surface and groundwater resources. MMPs are encouraged for all feedlots but are required for any facility as part of a feedlot permit application.

The MPCA has a free tool to assist in the MMP development process. You can download the MPCA MMP spreadsheet at: [www.pca.state.mn.us/sites/default/files/wq-f6-12.xlsm](http://www.pca.state.mn.us/sites/default/files/wq-f6-12.xlsm)

A feedlot owner should plan one crop year ahead. For example, during the 2022-2023 crop year a MMP would be developed for the 2023-2024 crop year.

Once the crop year has started you are no longer “planning” you are now implementing your plan and recording your manure application activities.

## Land application records

Land application records document the manure application activities taking place in the current crop year and those that happened in previous crop years. Information from the records is used to calculate the amount of nitrogen from manure application that will be available for the crop grown the following year.

Any feedlot with 100 or more animal units (AU) must keep records of land application activities.

Individuals that do not own a feedlot but receive and land apply manure from a feedlot with 100 or more AU must keep records of land application activities.

Forms to assist with recordkeeping can be found at: [www.pca.state.mn.us/business-with-us/land-application-of-manure](http://www.pca.state.mn.us/business-with-us/land-application-of-manure)

Historical records must be kept for at least 3 years. This timeframe is extended to 6 years when manure is applied in a sensitive area or for feedlot facilities that have NPDES or SDS permit coverage.

### Components of a MMP

- Manure source information
  - Expected nutrient content
- Field information
  - Acreage
  - Sensitive features nearby
  - Soil phosphorus test results
- Crop rotation information
  - Nitrogen needs
  - Phosphorus management
- Manure application rates
- Fertilizer application rates

### Information to record

- Manure analysis results
  - Date of manure sample
- Field acreage receiving manure
- Soil phosphorus test results
  - Only for 300 or more AU
- Crop rotation information
- Crop nitrogen needs
- Manure application rates
  - Application method
  - Application timing
- Fertilizer application rates

## Annual reporting (NPDES/SDS permitted facilities only)

Feedlot owners that have a NPDES or SDS permit are required to submit an annual report to the MPCA. The annual report includes general information about the facility, such as the number of animals, as well as records of land application activities.

The annual report is due March 1<sup>st</sup> of each year. The annual report must be completed on the MPCA form available at:

[www.pca.state.mn.us/sites/default/files/wq-f3-22b.docx](http://www.pca.state.mn.us/sites/default/files/wq-f3-22b.docx)

and submitted via email to the MPCA, as instructed on the form.

The timeframe covered by the annual report is the crop year that ended in the previous calendar year. You will need to attach your land application records for the corresponding crop year.

### Reporting period

Report due date	Reporting period
March 1, 2023	9/1/2021 to 8/31/2022
March 1, 2024	9/1/2022 to 8/31/2023
March 1, 2025	9/1/2023 to 8/31/2024
March 1, 2026	9/1/2024 to 8/31/2025
March 1, 2027	9/1/2025 to 8/31/2026
March 1, 2028	9/1/2026 to 8/31/2027

## Transferred ownership of manure

When manure ownership is transferred to a third party for land application the planning and record keeping requirements are less demanding, because the feedlot owner does not have direct control of the land application practices, while the annual reporting requirements stay the same.

Manure ownership is considered transferred when both of the following conditions are met:

- The feedlot owner\* does not own, lease, or rent the land used for manure application.
- The feedlot owner\*, or employee under the direction of the feedlot owner, does not control the crop and nutrient planning decisions of land used for manure application.

\* Feedlot owner includes the feedlot operator or a member of the feedlot ownership entity (Inc., LLP, LLLP, etc).

A feedlot owner that transfers ownership of manure completes a less rigorous MMP. The form for this MMP is available at: [www.pca.state.mn.us/sites/default/files/wq-f8-12.docx](http://www.pca.state.mn.us/sites/default/files/wq-f8-12.docx).

A feedlot owner that transfers ownership of manure keeps records of who received the manure and where the manure was land applied, as reported back to the feedlot owner by the manure recipient. A form to assist with this recordkeeping is available at: [www.pca.state.mn.us/sites/default/files/wq-f6-43.docx](http://www.pca.state.mn.us/sites/default/files/wq-f6-43.docx). This form is required to be included with the annual report as the land application records.

The manure recipient must keep the same records that would be required of a feedlot owner that did not transfer manure ownership. Refer to the land application records section of this factsheet for more information.

## Frequently asked questions

**Q: I use a commercial applicator; do I need to have a MMP and keep records?**

A: **MMP** - If you were required to submit a MMP as part of a permit application at any time you must continue to update and follow a MMP. Otherwise, you are required to have a MMP if the feedlot has 300 or more AU and the manure is not applied by a commercial applicator.

A: **Records** - You are required to keep records even if a commercial applicator is used.

**Q: How often do I need to test my manure?**

A: NPDES and SDS permitted sites must test annually. Other facilities must test annually for the first 3 years and then once every 4 years or sooner if nutrient content changes are expected.

**Q: How often do I need to test land application fields for soil phosphorus?**

A: Once every 4 years.

## More information

For more information visit: [www.pca.state.mn.us/business-with-us/land-application-of-manure](http://www.pca.state.mn.us/business-with-us/land-application-of-manure).