

NO 5 REVISED - REQUEST FOR REVIEW: BA25008 / Amin Valji

Filed By: Wayne Starchuk

Deadline for RFRs: September 8, 2025

Date RFR received: September 8, 2025

Status of Party as per Decision Summary: Directly Affected Party

## Request for Board Review (RFR) of an Approval Officer CFO Application Decision

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### Instructions

1. **Eligibility.** Only those parties listed as “directly affected” in the approval officer’s CFO application decision or those parties requesting reconsideration of their status (see page 2, section #3), are eligible to request a Board review (RFR).
2. **Jurisdiction.** The Board’s jurisdiction in Alberta to review a decision by an approval officer is set out in sections 20(5), 22(4), and 23(3) of the [Agricultural Operation Practices Act](#) (AOPA).
3. **Deadline.** The NRCB must receive an RFR by the deadline specified in the approval officer’s decision cover letter. The AOPA Administrative Procedures Regulation does not allow consideration of time extension requests or late submissions.
4. **Public Documents.** RFRs and attachments are public documents.
5. **Submission.** Submit this form and any attachments by email to Laura Friend, Manager of Board Reviews at [laura.friend@nrcb.ca](mailto:laura.friend@nrcb.ca). Contact her at 403-297-8269 for assistance.

### 1. Confined Feeding Operation (CFO) Application Details

NRCB Application No.	BA25008
Name of Owner/Operator or Operation	Amin Valji and Merrick Campbell
Type of application ( <i>if known</i> )	<input checked="" type="checkbox"/> Approval <input type="checkbox"/> Registration <input type="checkbox"/> Authorization
Location ( <i>legal land description</i> )	SW 12-55-27 W4M
Municipality	Sturgeon County, AB

### 2. Status Declaration

I hereby request a Board review of the approval officer’s decision:  
(*You must check one*)

- ☐ I am the owner/operator
- ☐ I represent the owner/operator
- ☐ I represent the municipality
- ☒ I am listed as a directly affected party in the approval officer’s decision
- ☐ I am **not** listed as a directly affected party in the approval officer’s decision and therefore I am requesting my status be reconsidered (see page 2, section #3)

### 3. Request for Reconsideration by Board of “Not” Directly Affected Status

**Instructions.** Only those parties **not** listed as directly affected in the approval officer’s decision are to complete this section.

- The Board can only consider RFRs submitted by "directly affected" parties. Those parties not listed as directly affected in the approval officer’s decision must first request the Board to reconsider their status. If the Board grants a party “directly affected” status, it will then consider their RFR.
- Upon receipt of a CFO application, the approval officer sends a notification letter to the “affected” parties. Affected parties are owners or occupants of land residing within a designated distance from the applied-for CFO. Operators and the municipalities located within the designated distance always have “directly affected” status.
- An affected party must apply for “directly affected” status by providing a written response to the approval officer’s notification letter by the deadline specified. The Board cannot reconsider the status of a party unless they had first responded to the approval officer.
- The approval officer determines the "directly affected" parties to the application based on the responses received and includes this determination in their decision.

**My grounds for requesting a reconsideration of my “not” directly affected status are:**

#### 4. Request for a Board Review (RFR)

All parties or their representative must complete this section. If you need more space, include an attachment.

- Approval officers must ensure that a CFO application meets the Alberta legislative requirements before they approve it. Conversely, approval officers must deny an application if the requirements are not met. (Sections 20 and 22 of the [Agricultural Operation Practices Act](#) (AOPA)).
- If you believe the **approval officer failed to adequately address an issue** (or issues), state the issue(s) and provide your reasoning below.
- The issue(s) must have been in front of the approval officer at the time they made the CFO application decision; the Board will not consider any new issues.
- Include how the decision affects you, such as any damage or bias you believe would occur to you because of the approval officer's decision.

**My grounds for requesting a Board review of the approval officer's decision are:**

See attachment

## 5. Board Action Requested

If the Board grants a review of the approval officer's decision (either an approval, denial, cancellation, amendment, or deemed permit), only the "directly affected" parties are eligible to participate (see section #3). A review will be in the form of either a hearing or a written review.

**If the Board grants a review, I would like it to:**

- ☒ Reverse the approval officer's decision
- ☐ Amend or vary the approval officer's decision

If the Board decides to grant a review on a permitted decision, it may decide to amend or vary the permit terms and/or conditions.

**Are there any new conditions, or amendments to existing conditions, that you would like the Board to consider?**

## 6. Contact Information of Person Submitting the RFR

Name Wayne Starchuk

Street/Box Address [REDACTED]

Town/City/Postal Code Sturgeon County, AB T8R 1W4 P/o NW 12-55-27 W4M

Legal Land Description [REDACTED]

Telephone Number [REDACTED]

Email Address [REDACTED]

Date Sept 8, 2025

## 7. Contact Information of Legal Counsel or Representative (if applicable)

Name

Address

Telephone Number

Email Address

**My grounds for requesting a Board review of the approval officer's decision are:**

Historical NRCB non-compliance issues

In discussion, the approving officer said he had no knowledge of any previous NRCB non-compliance issues lodged against the applicant, including an enforcement order, at the applicant's other CFO's, KUKU Farms (BA19002) and Creekside Grove Farms (BA04008). I do not understand how the NRCB Approval Officer can issue an approval and at the same time not take into consideration a well documented, proven track record of blatant disregard for NRCB regulation and enforcement. In this province, a speeding ticket or accident goes on a driver's record and will affect the cost, and possibly his/her ability to even obtain insurance, for years into the future. What is the purpose of NRCB jurisdiction if proven non-compliance does not garner any form of penalization?

Inadequate community effects consideration

Oxford dictionary defines "neighbour" as "a person living near or next door to the person referred to", in this case the "directly affected parties". The applicant, Amin Valji, resides outside of the municipality and has no personal relations with the surrounding community. Establishment of a "good neighbour relationship", as suggested by the applicant and the NRCB, can only be established with actual full time neighbours. The applicant's intention is not to become a "neighbour", but rather a remotely located business owner, imposing his undesirable operating activities on our tight knit community. Public consultation would have gone a long way in establishing a respectful relationship between the applicant and the directly affected, and indirectly affected, parties of this community. Amin Valji has no skin in the game within which all surrounding residents are playing.

The 164 letters of opposition received far outweigh the 2 statements of support received from outside the notification radius. The proposed operation is not wanted by 98.9% of the surrounding community, including Sturgeon County Council members and Alexander First Nation, affecting the lives and economy of the people that call this community their home.

I am one of two residents that will be closest to the proposed operation. In 2024 I, along with several surrounding neighbours, were approached by co-applicant Merrick Campbell asking for support in grandfathering his existing family owned cattle operation via a deemed permit (PB24001). Prior to this time, the operation existed outside of the jurisdiction of the NRCB. Merrick has always been a good neighbour and respected community member and support for his family owned operation was deemed appropriate. At the time there was no

mention of sale of the property, nor the potential to have the existing CFO expanded, altered or changed to another form of livestock. The CFO application notification we received on Mar 7, 2025 named Amin Valji as the sole applicant of the CFO change request. Upon initial overwhelming opposition to the proposal, the size of the application was reduced to eliminate over 85% of the directly affected parties. Not eliminating the nuisance of the operation itself, just the amount of qualified opposition to it. There was no mention of Merrick Campbell being added as a co-applicant until we received the notice of Approval (BA25008) and Decision Summary (BA25008) on Aug 15, 2025. As a result of these seemingly devious actions to push the application through, several of the directly affected parties feel like we were duped into supporting a potentially unwanted underlying motive.

That being said, Merrick Campbell was born and raised in this community and has always had a "good neighbour relationship" with myself and the people of this community. Neither myself nor the surrounding neighbours have been approached by, or even met, the other co-applicant and future potential sole permit holder Amin Valji. Solid relationships are earned and Mr. Valji has a long way to go if he wishes to establish the same form of relationship with this community, as so far things have taken off on the wrong foot.

With full respect, I ask that the Board review Kuku Farms and Creekside Grove Farms, their operations, and the impacts on land and the surrounding residents they have had in the past.

Regards,

Wayne Starchuk