

AMIN VALJI

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Natural Resources Conservation Board

Attention: Laura Friend, Manager, Board Reviews

Sent by Email: laura.friend@nrcb.ca

RE: Rebuttal Opportunity - Decision Summary BA25008 Amin Valji

Dear Ms. Friend,

Thank you for the opportunity to review and respond to the Request for Review (RFR) correspondence received regarding our NRCB Application BA25008.

As you know, we are a family-run farm operation that has been farming in Sturgeon County for over 40 years. I took over the farm from my father, and my son, a 3rd generation farmer is now working with me. While we are a large operation, we are still a local agricultural farm, striving to provide Canadians with the best possible high quality, locally produced eggs while maintaining animal welfare, food safety and environmental standards. We pride ourselves on being ethical, responsible farmers.

We have reviewed each of the RFR submissions received and appreciate the opportunity to respond to the statements shared by the four directly affected parties. We want to provide whatever clarifications we can to help educate and improve the understanding of our farming operation.

Several concerns have been raised regarding farm practices contributing to odor and nuisances, traffic and road use, manure containment and spreading etc. We understand these are concerns when living adjacent to farming operations on agricultural land. Poultry farming practices are continually improving and evolving to help minimize some of these issues and we have previously provided a detailed written response related to each of these issues to the NRCB as part of the application process. We feel these are well outlined in Appendix C of the Decision Summary BA25008.

There is reference in the RFR related to our farms' compliance with NRCB regulations and animal welfare standards. These statements directly question our credibility and reputation and are not based on fact. We feel it is important to clarify and address these comments.

The Enforcement Order referenced in the RFR was issued 22 years ago, shortly after we purchased our pullet farm, Creekside Grove Farms. At that time, we were in the process of addressing a few

structural and operational issues that we inherited from the previous owners. The issues identified by NRCB with the manure storage were rectified within the year. Except for this one Enforcement Order over 20 years ago, we have had no further Enforcement Orders at either one of our farms.

As family farmers that have been in this industry for over 40 years, no one is more interested or concerned about animal welfare and ethical practices than we are. We work closely with the various regulating agencies within the egg industry and were the first farm in Canada to adopt three new policies when the national Animal Care Program was initially introduced in 2014: the Farm Welfare Policy, the Employee Code of Conduct and the Visitor Policy.

Like all egg producers in Alberta, we are subject to regular inspections and audits based on standards set by the Egg Farmers of Canada (https://www.eggfarmers.ca/wp-content/uploads/2020/06/2025-02-12_On-farm-program-requirements_Fact-sheet.pdf).

All registered Canadian egg farmers take part in a comprehensive national Animal Care Program and Start Clean-Stay Clean® program. These programs are administered by Egg Farmers of Canada (EFC) and are based on the National Farm Animal Care Council's (NFACC) Code of Practice for the Care and Handling of Pullets and Laying Hens, which covers topics such as housing, barn environment, flock care and husbandry practices, handling, euthanasia and depopulation. The national Animal Care Program includes regular farm audits by trained field inspectors and third-party auditors to verify compliance with the program—ensuring the consistent application of welfare standards across the country and that hens receive optimal care. The comprehensive national Animal Care Program includes over 100 requirements. Farmers must meet all program requirements to pass their annual audit and receive their EQA® certification. Annual inspections are also conducted for rigorous standards for food safety through the national Start Clean-Stay Clean® program.

In all the years we have been operating our farms, we have never failed any one of these inspections and have had zero incidents or issues identified. The various policies, procedures, audits and training programs we have in place are continuously improved and updated to ensure we provide the expected standards of care.

Ensuring we comply with AOPA, animal welfare and other safety and environmental regulations is a key priority for us. We are familiar with, understand and respect the various legislation and regulatory processes that are in place and have been working with NRCB, the Egg Farmers of Alberta (EFA), Egg Farmers of Canada (EFC) and various other regulatory bodies and agencies for many decades to ensure we are compliant and continually improving our operations.

Additionally, we have a good relationship with our neighbors at both of our farm locations and do our best to respond to any concerns or issues raised that may cause any inconvenience to them. Our farm manager lives on-site, and we have staff available on our farm 24 hours a day/7 days a week to ensure any urgent issues can be addressed. My son, who manages the operation, is also on-site 7 days a week and lives near the farm. We understand the need for good communication and relationships with adjacent landowners and will do our best to minimize any inconvenience to them.

We respect the due process in place to review and consider these applications and appreciate the opportunity to provide a response.

Please let us know if you require any further information. Thank you.

Sincerely,

Amin Valji