



**Decision Report PR25001 for**  
**Grandfathered (Deemed) Permit Determination**  
**under the**  
***Agricultural Operation Practices Act***  
**Rosanna Walker Farm Ltd.**  
**SE 02-35-17-W4M**

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## 1.0 Introduction and background

This document sets out the written reasons for my determination as to the footprint, facilities, and the livestock capacity and type in a deemed permit request as they existed on January 1, 2002, under the *Agricultural Operation Practices Act* (AOPA). The subject of the determination is a hybrid swine operation located on SE 02-35-17-W4M (this quarter section will be referred to as “the site”). The site is located in Stettler County, approximately 1.5 kilometres southwest of the hamlet of Byemoor, Alberta. The process of ascertaining livestock capacity and livestock type under a deemed permit is known commonly as a “grandfathering” determination.

On November 1, 2024, as the result of an inquiry (File No. RC24043), subsequent discussions with the operator, and a site inspection on September 19, 2024, Natural Resources Conservation Board (NRCB) compliance and approval staff met online via Zoom with Rosanna Walker (owner), Ralph Walker (applicant/operator), and James Webb (production manager) of Rosanna Walker Farm Ltd. During the zoom meeting Ralph Walker, on behalf of Rosanna Walker Farm Ltd., requested that the NRCB conduct a grandfathering determination for the hybrid swine operation located at SE 02-35-17-W4M.

On January 20, 2025, a written grandfathering determination request was received for SE 02-35-17-W4M with a claimed livestock capacity of 4,500 swine and 180 cattle (**Appendix A**). On February 10, 2025, the NRCB received an email forwarded from the operator on behalf of Rodney Grams, former site manager of Rosanna Walker Farmer Ltd., advising that on January 1, 2002, the livestock type and capacity was 4,600 hybrid swine (700 sows) farrow to finish and 180 cow/calf pairs. The operator later confirmed the claimed livestock type and capacity as stated by Rodney Grams (**Appendix B**). The site is owned by the corporate entity, Rosanna Walker Farm Ltd., and the corporation is owned by Rosanna Walker. Ralph Walker manages the site along with an onsite manager.

Under section 11(5) of the Administrative Procedures Regulation under AOPA, after completing a grandfathering investigation, an inspector is required to issue a decision report including reasons for the decision on whether a deemed permit exists.

The operation does not hold any municipal development permits or NRCB permits. Under section 18.1(1)(a) of AOPA, confined feeding operations that existed (even without a municipal development permit) on January 1, 2002, are grandfathered.

It is therefore necessary for me to determine:

1. Was there a “CFO” on this site on January 1, 2002?
2. Was the CFO above the permitting thresholds under AOPA on January 1, 2002?
3. If so, what was the footprint on January 1, 2002?
4. What were the structures on January 1, 2002? How were the structures being used (e.g. confined feeding, seasonal feeding and bedding site (SFBS))?
5. What category(ies) of livestock was the CFO confining and feeding, or permitted to confine and feed? What type(s) of livestock in that category (e.g. farrow to finish, farrow to wean, farrow only, feeder/boars, etc.)? What livestock numbers were permitted or being held for each type of livestock?
6. What was the capacity of the structures to confine livestock on January 1, 2002?
7. Is the claimed capacity within a reasonable range of the physical capacity on January 1, 2002?

For the reasons that follow, I concluded that the operation existed as a mixed confined feeding operation (CFO) and seasonal feeding and bedding site (SFBS) facility on January 1, 2002. The CFO portion of the site had the capacity to confine 700 (sows) hybrid swine farrow to finish, therefore the CFO was above permitting thresholds. The claimed capacity of 4,600 hybrid swine (700 sows) is within a reasonable range of the physical capacity on January 1, 2002. The 180 cow/calf pairs are considered a SFBS as they were only on site during the winter months and calving. The rest of the year they were off site grazing.

I note that the capacity of the enclosures to confine livestock and the management of the CFO is not the same today as it was on January 1, 2002.

To ensure transparency with AOPA and consistent decision-making, a complete and thorough investigation was conducted to address the questions listed above, ensuring that all relevant aspects of the operation were considered in making a formal grandfathering determination.

## **2.0 Context and process**

### **2.1 Legal context**

Under section 18.1(1)(a) of the *Agricultural Operation Practices Act* (AOPA), the owner or operator of a confined feeding operation that existed on January 1, 2002, for which a development permit was not issued by the municipality, is deemed to have been issued a permit under AOPA. The capacity allowed by a deemed permit is the capacity of the enclosures to confine livestock at the CFO on January 1, 2002 – section 18.1(2)(a) of AOPA.

The question of whether there was a “confined feeding operation” on this site on January 1, 2002, may turn on the definition of “CFO” in AOPA. In AOPA, “confined feeding operation” is a defined term in section 1(b.6):

*“confined feeding operation” means fenced or enclosed land or buildings where livestock are confined for the purpose of growing, sustaining, finishing or breeding by means other than grazing and any other building or structure directly related to that purpose but does not include ... livestock seasonal feeding and bedding sites....*

As excluded from the “CFO” definition, “seasonal feeding and bedding site” is also a defined term in section 1(i) of AOPA:

*1(i) “seasonal feeding and bedding site” means an over-wintering site where livestock are fed and sheltered;*

Section 5.1 of the Part 2 Matters Regulation of AOPA states that “if a type of livestock within a category of livestock specified in the Schedules is not listed in the Schedules, an approval officer, or the Board may determine anything necessary to apply the regulations to that type of livestock”. To determine threshold levels for the hybrid swine operation, which is an unspecified livestock type not listed in the Schedules, an average of the threshold levels for swine and wild boar was used.

To be grandfathered, a CFO must have been at or above AOPA threshold numbers on January 1, 2002. The Part 2 Matters Regulation under AOPA identifies the threshold to require a permit for Swine (sows only) farrow to finish is 30 and Wild Boar Sow (farrowing) is 50 for a registration; and Swine (sows only) farrow to finish is 250+ and Wild Boar Sow (farrowing) is 100+ for an approval. Taking the average of Swine (sows only) farrow to finish and Wild Boar



Sow (farrowing), threshold levels to require a permit for a hybrid swine (sows only) farrow to finish operation is 40 for a registration and 175+ for an approval.

The Administrative Procedures Regulation under AOPA includes section 11 governing deemed permit investigations. Section 11(1) of the Regulation states that:

*11(1) At the request of an owner or operator for a determination related to a deemed permit under section 18.1 of the Act, or in response to a complaint where a determination of the terms or conditions or existence of a deemed permit is required, an inspector shall conduct an investigation to determine the capacity of a confined feeding operation or manure storage facility*

- (a) that was in place on January 1, 2002, or*
- (b) that was constructed pursuant to a development permit issued before January 1, 2002.*

The NRCB has formalized grandfathering decisions by adopting processes set out in section 11 of the Administrative Procedures Regulations under AOPA and through the [NRCB Operational Policy 2023-01: Grandfathering \(Deemed Permit\)](#). These documents provide the framework to establish the facts and the scope of the grandfathering determination process.

## **2.2 Standard of proof**

Section 11 of the Administrative Procedures Regulation under AOPA states that an inspector shall conduct an investigation to determine capacity of a CFO in place on January 1, 2002. Grandfathering determinations require findings of fact. Whether a CFO existed on January 1, 2002, above threshold, is a question of fact. Similarly, what category and type of livestock, and what capacity the CFO had on January 1, 2002, are also questions of fact.

If not otherwise specified in legislation, the standard of proof in a civil administrative proceeding like this is a “balance of probabilities”—that is, whether a relevant fact is more likely than not to be true.

## **2.3 Flexible approach to grandfathering date**

Section 18.1 of AOPA focuses on facts as they existed on the precise grandfathering date of January 1, 2002. However, I generally sought evidence as to the type of livestock and the livestock capacity at the operation between 2000 and 2004 (see Operational Policy 2023-1: Grandfathering (Deemed Permit), part 6.0). Considering the operation for at least two years before and two years past the January 1, 2002, grandfathering date seemed useful because witnesses might not remember what occurred on the exact date of January 1, 2002, and documents may not have the exact date. Also, considering how an operation functioned over a range of dates might shed additional light on how the operation functioned on a given day within that range.

The NRCB generally uses a pragmatic and flexible approach toward applying the January 1, 2002, grandfathering date. This approach is reasonable because a more rigid or stricter application of the January 1, 2002, grandfathering date could lead to unfair results if, for example, an operation happened to have emptied its enclosures on January 1, 2002, or was half-way through rebuilding or constructing the enclosures on that date or had shut down temporarily due to short-term market crises. Thus, the 2000 to 2004 range was meant to generate sufficient evidence to apply this pragmatic and flexible approach.

## 2.4 Notice

Under Part 2 Matters Regulation of AOPA, the municipality where the CFO is located is an affected party (see section 5 of the regulation). As such, the NRCB provided notice of the grandfathering investigation to the County of Stettler and invited comments. The NRCB also sent information to Alberta Agriculture and Irrigation (AGI), Alberta Environment and Protected Areas (EPA), Alberta Transportation and Economic Corridors (TEC), Paintearth Gas Co-op Ltd., and ATCO Electric Ltd.

I sought neighbours' perspectives on the factual questions on the footprint, use of facilities, capacity and type of livestock being confined and fed on January 1, 2002. I wanted to collect relevant historical information from those who may have lived in the area around that date. Notice is required in section 11(2) of AOPA's Administrative Procedures Regulation. Before determining a deemed approval for an operation that was in place on January 1, 2002, the NRCB inspector is required to provide notice to those parties "who would be entitled to notice under section 19(1)" of AOPA for a new CFO with the same capacity.

In this case, the claimed capacity is 4,600 hybrid swine (700 sows) farrow to finish (used swine – sows only – farrow to finish) which puts the distance for affected persons entitled to notice under section 19(1) of AOPA at 1.5 miles. The distance is set out in section 5 of the Part 2 Matters Regulation.

On February 27, 2025, notice of the grandfathered (deemed) permit determination request was published in the Stettler Independent newspaper. In the notice, I advised of the claim by Ralph Walker on behalf of Rosanna Walker Farm Ltd., for a deemed permit for 4,600 hybrid swine (700 sows) farrow to finish, and I invited the public to provide written submissions related to the facilities, and capacity and type of livestock produced by the facility on January 1, 2002. I also invited the public to apply for status as directly affected parties. The deadline for written submissions was March 27, 2025.

In addition, on February 19, 2025, thirteen notification letters were sent to people who (according to the County of Stettler) reside on or own land within a 1.5 mile radius of the operation who might have relevant information as to the capacity and type of livestock that the CFO produced around January 1, 2002. The notification letters included information similar to that in the newspaper notice.

The NRCB published notice of the grandfathering determination on its public website at [www.nrcb.ca](http://www.nrcb.ca), as well as the grandfathering determination request form submitted by James Webb on behalf of Ralph Walker and Rosanna Walker Farm Ltd.

## 3.0 Evidence

### 3.1 Information at the NRCB

On August 14, 2024, I received an inquiry regarding a wild boar operation location at SE 02-35-17-W4M in the County of Stettler (NRCB File No. RC24043). Following the receipt of the inquiry I conducted a search of the NRCB's hard copy files, the NRCB database, and historical aerial imagery (Valtus 1999 – 2003, Google Earth Pro October 1, 2003, Google Earth Pro April 30, 2007, Valtus 2011, Valtus 2013, Valtus 2015, Google Earth Pro July 20, 2018, Google Earth Pro September 1, 2019, Valtus 2022, and Google Earth Pro June 5, 2024) (**Appendix C**).

The search found a complaint from 2011 (NRCB File No. RC11090) that manure from a wild boar farm was flowing into the county ditch which leads into a natural runway across a neighbouring property. An NRCB Inspector conducted a site inspection on October 20, 2011, and met with the site manager at that time (Rodney Grams) and discussed the complaint received by the NRCB. The inspector's notes indicate that Rodney had acknowledged, at that time, that there had been expansion at the site including work on catch basins and the creation of a pen for housing hogs just north of the residence. The inspector scheduled a follow up site inspection with an approval officer (AO) on October 27, 2011. The inspector and AO met with Rodney Grams and discussed the management of the facility. Rodney Grams supplied a Google Earth aerial imagery of the site with pens depicted and animals associated to each pen listed. Site photos were taken at this time by the inspector.

The inspector note's state that the inspector and AO discussed the file at length and mutually agreed that the site did not meet the NRCB's definition of a CFO. In addition, the inspector's and AO's decision was based on the following:

- there was very little manure associated with any of the pens,
- there had been no soil work to create liners in the pens,
- the pens would be vegetated again soon after animals were removed,
- the dugouts being built by Rodney Grams were used specifically to capture surface water run-off to allow the hogs to muck about, and although each pen had waterers in them, the hogs also used the dugouts for drinking water, and
- although the historical aerial photos compared with Rodney confirmed that there had been a reconfiguration with some of the pens, it did not appear that there had been any expansion of the pens with the use of the pens changing over the past ten years to include hogs, sheep, and cattle at various stages.

On November 7, 2011, the inspector emailed the operator a letter that addressed the initial complaint (RC11090) and addressed whether the facility should be designated as a CFO and if it required a permit from the NRCB. The inspector stated in the letter: "With the assistance and full explanation of the management of the site from Mr. Grams, the NRCB is of the opinion that your facility does not require permitting at this particular point. We do encourage you to continue to ensure that your manure management practices follow the generally accepted rules of short-term storage and land spreading within a 7-month time frame" (**Appendix D**).

On August 14, 2024, I contacted the operator (Ralph Walker) regarding the inquiry we had received (RC24043) about an above threshold wild boar CFO operating at SE 02-35-17-W4M.

On August 29, I sent an email to the owner (Rosanna Walker Farm Ltd.) and the operator requesting permission for the NRCB to conduct a site inspection of the facility.

Between September 3 and September 18, 2024, I spoke to the operator on several occasions regarding the operation of the site. The operator discussed the classification of the livestock (hybrid swine, not wild boar), the eradication of viruses, concerns with the County of Stettler, and several other topics.

On September 4, 2024, the operator advised there were currently 400-500 pigs including babies on site.

When I spoke with the operator on September 9, 2024, we discussed AOPA and threshold levels for permitting requirements and livestock management. The operator advised they

currently had around 800-900 farrow to finish with sows and that they do the “rotational grazing thing”.

On September 19, 2024, Compliance Manager Kevin Seward and I attended SE 02-35-17-W4M and met with the current site manager Greg. Greg advised he started working at the site in 2014 and that four new pens had been built since that time, one of which was the isolation pen. He stated they usually breed in groups of 100 sows. They currently had 100 sows that were dried up (that will be sent for cull), 100 sows that haven’t pigged yet, and 100 sows that have babies (total 300 sows). Sows are from the internal breeding herd. Sows and boars are 50/50, ½ domestic ½ wild boar cross. Sows farrow out in the pens. They are always rotating pens as all pens are rooted up. The only vegetation is in the empty pens and there is some in the farrowing pens. All pens have 2-3 feeders all winter and they try to have manure hauled out. Greg advised that no pigs are kept in enclosed buildings, everything is open. Greg then took us on a tour of the site. I had a copy of Google Earth Pro Aerial Imagery dated June 5, 2024, with me. Greg provided me with the layout, the names, and a description of what each pen was used for. I took digital photos of the site at this time. The pen layouts, pens names, pen uses as described by Greg, and site photos taken on September 19, 2024, are shown in **Appendix E**.

On November 1, 2024, NRCB personnel from Approvals and from Compliance Divisions met with Rosanna Walker (sole director and shareholder of Rosanna Walker Farm Ltd.), Ralph Walker (applicant/operator), and James Webb (production manager) via an online Zoom meeting. During this meeting Compliance Manager, Kevin Seward explained the NRCB’s role with respect to AOPA and the regulations. Kevin discussed the site inspection in 2011, at which time it was determined the operation was being managed using rotational grazing and that an AOPA permit was not required, and therefore grandfathering did not apply. The owner/operator was advised that a permit would now be required due to the change in management practices and expansion of the facility footprint. The operator requested that a grandfathering determination be completed stating that pigs have been grazed and always grain fed and that they built the pens to make the pigs easier to handle, but now have less numbers, stating they have more pens but less pigs.

On January 20, 2025, the NRCB received a grandfathering determination request application from the operator (Appendix A).

### **3.2 Information from operator**

On February 11, 2025, I emailed the operator requesting confirmation as to the claimed livestock capacity as there was a discrepancy between the total number provided in the grandfathering determination request application including the original email from Rodney Grams (Appendix A) and the later email provided by Rodney Grams on March 23, 2025 (Appendix I).

February 12, 2025, I received an email response from the operator clarifying that the total number of swine for the grandfathering determination request was 4,600, as indicated by Rodney Grams who solely managed the farm on January 1, 2002.

On February 19, 2025, I emailed a questionnaire to Ralph Walker, Rodney Grams, James Webb and Rosanna Walker attempting to ascertain additional information as to the use and management of the site on or about January 1, 2002. The questionnaire included questions

pertaining to the use of the indoor facilities, the outdoor pen areas, and general questions relating to the operation of the site on or about January 1, 2002 (**Appendix F**).

Ralph Walker and Rodney Grams on behalf of Rosanna Walker Farm Ltd. provided a total of four documents to support the claimed grandfathered capacity of 4,600 hybrid swine (700 sows) farrow to finish.

The first document was a letter written by Rodney Grams (no date) submitted by Ralph Walker with the Grandfathering Determination Request application on January 20, 2025 (Appendix A). The letter stated Rodney worked at the operation part time from 1998-2001 after which he worked full time until 2018. Rodney stated that while he was working full time there were wild boars farrow to finish, 4,200 to 4,500 head. There were also 100 head of cow/calf pairs and in later years up to 220 head in winter months, with all going out to pasture in spring to late fall and back to the farm to feed and calve out in the spring.

The second document was an email dated February 10, 2025, forwarded from Ralph Walker originating from Rodney Grams advising they raised and slaughtered 4,600 head per year for the years in question (**Appendix G**). A breakdown was provided:

- 200 sows after their 2<sup>nd</sup> litter which averaged 7 per litter which equals  $200 + 1,400 = 1,600$  head to slaughter each year
- plus 500 head of 1<sup>st</sup> litter sows which averaged 5 per litter =  $500 + 2,500 = 3,000$  head to slaughter each year
- The babies take 1 year to finish to slaughter on these outside raised hybrid swine
- The final total of  $200 + 500 = 700$  sows and 3900 head of finished yearling every year.

The third document was an email from Rodney Grams on March 13, 2025, of a hand drawn map depicting the site in 2001, which included the location of pens, quonsets, bins, barn, house, well, and the location of cattle in winter and pigs in the summer (**Appendix H**).

The fourth document was an email from Rodney Grams dated March 23, 2025 (**Appendix I**), as a follow-up to the map he drew and emailed on March 13, 2025 (Appendix H). In his email, Rodney advised the entire quarter was used for the farrow to finish production of the outside mixed crossed porcine, the same as it is used today. The outer pens were used for breeding and farrowing, then as they were weaned the little ones were moved to grower pens closer in the biotech buildings. Farrowing took place during the late spring, summer and early fall months. All farrowing was done outside with portable wind breaks, portable shelters, and large round straw bales. All pens have auto waterers, there are grain feeders in all pens, and hogs are also fed hay and straw. Free choice. All old manure and old bedding are piled, then hauled out to neighbours' farmland and spread out as fertilizer in the fall. The outer area from the main farm drawing is where cows are in winter months, for feeding and spring calving. When cows and calves go out to summer pastures, hogs go into that area to clean up excess feed for summer months to be a growing area for hogs. There are also grain feeders and waterers for hogs in these pens. Any new fencing out there is to comply to the new fencing regulations for hogs. Any excess manure and excess waste feed is piled and hauled to neighbours' fields and spread for fertilizer. There are water catch basins in all pens for any extra drainage. These catch basins also turn into mud baths for hogs on hot days. There is one large freshwater dugout on the south end and five deep wells for water.

Table 1. Information submitted by operator and relevance

Description of record	Relevant and considered?	Appendix (only if relevant and considered)
Email (no date) from former Site Manager, Rodney Grams	Yes - worked on the site part-time from 1998 – 2001 and then full time until 2018. The statement provides the employee's knowledge of the type and number of livestock	Appendix A
Email dated February 10, 2025, from Rodney Grams forward by Ralph Walker	Yes – provides detailed numbers of the swine at the site on or about January 1, 2002	Appendix G
Email dated March 13, 2025, from Rodney Grams	Yes – hand drawn site map of the site in 2001 which included a pen layout, structures, and wintering and summering locations of livestock	Appendix H
Email dated March 23, 2025, from Rodney Grams	Yes – A follow-up to the hand drawn map submitted March 13, 2025, which provides details as to the management of the site on or about January 1, 2002	Appendix I

### 3.3 Information from municipality

Under the Part 2 Matters Regulation under AOPA, the municipality where the CFO is located is an affected party (see section 5 of the regulation). As such, the County of Stettler is an affected party and is also a directly affected party in this deemed permit determination, as they would be if this were an application for an approval today.

On March 26, 2025, I received an email response from the County of Stettler which included a response letter dated March 21, 2025, historical aerial imagery from 2003, 2007, 2015, 2021, and 2024, a completed and signed Form 2 Notice to Control Pests, an Inspection Summary Sheet (included dates of inspections from 2014 – 2024 and the range of approximate number of boars at the time of inspection), and a copy of fencing area estimate (**Appendix J**).

The response letter dated March 21, 2025, from the Director of Operations, Gregory Jackson, stated that the aerial photographs from 2003 to 2024 show the expansion of the farm over 20 years (Appendix L). The letter indicated the farm raises wild boar, of which the County has conducted numerous inspections under the *Agricultural Pests Act* over the years, and provided a current pest notice for wild boar at large. The letter also stated the County of Stettler has no record of a permit issued under their land use bylaw prior to January 1, 2002, at which time a permit would have been required for an Intensive Livestock Operation. The County of Stettler asked to be considered a directly affected party.

### 3.4 Evidence from neighbours

On February 19, 2025, thirteen notices were mailed to neighbours who own or reside on land within a 1.5 mile radius of the site. No responses were received from neighbours.

### 3.5 Other evidence

#### Evidence from other Agencies

On March 3, 2025, the NRCB was copied on an email response from Alberta Environment and Protected Areas (EPA) to the applicant, advising that no *Water Act* licensing exists at this land location and that licensing is required.

On March 25, 2025, a response was received from Transportation and Economic Corridors (TEC) advising they have no objections with permitting the grandfathering of the operation and that any development within their setback requires a permit.

### 4.0 Analysis and Findings

#### 4.1 Was there a CFO on site on January 1, 2002

Under AOPA, a seasonal feeding and bedding site (SFBS) is not a “confined feeding operation.”

*“confined feeding operation” means fenced or enclosed land or buildings where livestock are confined for the purpose of growing, sustaining, finishing or breeding by means other than grazing and any other building or structure directly related to that purpose but does not include ... livestock seasonal feeding and bedding sites....*

where

*1(i) “seasonal feeding and bedding site” means an over-wintering site where livestock are fed and sheltered;*

NRCB’s Operational Policy 2015-2 (Revised July 5, 2018), [Distinguishing Between Confined Feeding Operations and Seasonal Feeding and Bedding Sites \(For Cattle Operations\)](#), section 1.1 Uses of the policy states “If SFBS determinations are needed for facilities that confine other livestock types, determinations should be made on a case-by-case basis, based on the expertise of Field Services staff and considering all relevant factors”.

After reviewing the information submitted by the applicant, my site inspection on September 19, 2024, review of historical aerial imagery, and information submitted by the County of Stettler, I conclude that the site contained both elements of a CFO and a SFBS on January 1, 2002.

Using Rodney Grams’ hand drawn map – 2001 (Appendix H) and email dated March 23, 2025 (Appendix I), and Valtus Aerial Imagery 1999 – 2003 & Google Earth Pro Aerial Imagery dated October 1, 2003 (Appendix C) I have made the following determinations:

The main pen areas contained the following CFO characteristics:

- most lacked vegetation
- used year-round for housing, feeding, and growing swine “weaned little ones were moved to grower pens closer in the biotech buildings”
- had auto waterers and grain feeders (swine were also fed hay and straw)
- all old manure and bedding were piled and hauled out to neighbours’ farmland for spreading
- included permanent infrastructure (pens, barn & quonsets)

- > 1,000 head at any one time

The pasture and cropped areas outside of the main pen areas displayed the following SFBS characteristics:

- the outer area (outside the defined pen area) was vegetated as pasture, with the northeast corner of the quarter being cropped - visible on Google Earth Pro Aerial Imagery dated October 1, 2003 (Appendix C)
- the outside pasture and cropped areas were used to for over-wintering cattle, which included feeding and spring calving
- when the cow/calf herd was moved to summer pastures, hogs would be moved to this area to clean up excess feed for summer months and used as a growing area for hogs
- grain feeders and waterers were also used in this area
- all breeding and farrowing occurred in this area
- farrowing took place during spring, summer, and early fall months
- all farrowing was done outside with portable wind breaks, portable shelters, and large round straw bales
- swine had 360-degree access to the feeding area, with the feeding area moved within or across years
- any new fencing was to comply with new fencing regulations (little or no permanent infrastructure)
- manure is spread over a large area requiring little or no management

I considered the evidence above and concluded that some enclosures were part of a “CFO” on January 1, 2002, and some were not. NRCB Operational Policy 2015-2: Distinguishing Between Confined Feeding Operations and Seasonal and Feeding Bedding Sites (for Cattle Operations) provides guidance on how to make this distinction for cattle operations. The NRCB also uses the CFO/SFBS Policy as a guide for making distinctions between CFOs and SFBS for other livestock types. Although swine do not typically graze, they will eat grass and other vegetation (rooting) with supplemental feeding often necessary.

See **Appendix K** for a map identifying which enclosures were used for confined feeding, and which enclosures/areas were used as seasonal feeding and bedding sites, on January 1, 2002.

## 4.2 CFO footprint and structures

The evidence set out above and attached as appendices shows that the footprint containing the pens as identified by the applicant on the hand drawn map – 2001 (Appendix H) is consistent with aerial imagery from Valtus 1999 – 2003 and Google Earth Pro dated October 1, 2003 (Appendix K).

Based on my site inspection on September 19, 2024, discussion with the site manager Greg during that inspection, review of historical aerial imagery from 1999 – 2003 to 2024 (Appendix C), historical aerial imagery submitted by the County of Stettler (Appendix J), and the hand drawn map – 2001 submitted by Rodney Grams (Appendix H), I conclude that the footprint of the CFO today is not the same footprint that existed on January 1, 2002.

Based on this evidence, I have concluded that on January 1, 2002, this CFO consisted of the following manure collection areas (MCAs):

- Pen 1A which included 1 quonset/open face shelter
- Pen 2A – 1 barn and 1 quonset (quonset removed sometime between 2013 and 2015)



- Pen 3A – included 1 barn
- Pen 4A
- Pen 5A
- Pen 6A – included 2 quonsets/open face shelters

See **Appendix K** for a map of all MCAs.

Based on the notes from the NRCB Inspector regarding the site inspection October 27, 2011, and the information provided by Rodney Grams, site manager at that time, the site had already been expanded including work on catch basins. Historical aerial imagery does not show any catch basins, other than what appears to be either a natural seasonal depression in Pen 3A, on or about January 1, 2002.

The areas operated as a SFBS (cow/calf area and swine grazing area) are not considered CFO facilities and therefore no capacity calculation is required.

### 4.3 Livestock type

The operator, in the grandfathering determination request application, has claimed the livestock type as a hybrid swine farrow to finish operation. This is consistent with the information provided by site manager Greg, during the site inspection September 19, 2024, stating the sows and boars are 50/50, ½ domestic ½ wild boar cross, and the email correspondence from previous site manager, Rodney Grams, who advised the whole quarter was used for the farrow to finish production of the outside mixed crossed porcine. In his letter, submitted with the grandfathering determination request application, Rodney Grams refers to the type of livestock as wild boars farrow to finish.

The applicant/operator has not provided any livestock records to support the claimed livestock type.

The County of Stettler has provided information stating the operation raises wild boar and that the keeping of wild boar and hybrids thereof requires management under the *Agricultural Pest Act* by the County of Stettler.

Based on the above information, the livestock type for this operation has been determined to be a hybrid swine farrow to finish operation.

### 4.4 CFO livestock capacity

The Grandfathering (Deemed Permit) Policy at 6.3.3 provides:

*If there is no MD permit, then field services staff determine the capacity of the enclosures to confine livestock (“physical capacity”) under section 18.1(2)(a) of AOPA.*

Importantly, it is the capacity to confine feed, rather than the actual number of confined livestock, that determines capacity for this deemed approval.

When determining livestock capacity, a useful tool is the [Technical Guideline Agdex 096-81 Calculator for Determining Livestock Capacity of Operations as They Existed on January 1, 2002](#) (see NRCB Operational Policy 2023-1: Grandfathering (Deemed Permit) at 6.3.2). However, this tool does not account for swine (hybrid swine) raised in an outdoor setting.

There is limited industry information on calculating capacity for confine feeding of swine (hybrid swine) in an outdoor setting. The Canadian Small-Scale Pig Farming Manual (August 2021) composed by the Canadian Association of Swine Veterinarians, Canadian Agricultural Partnership and the Government of Canada states that a typical rule of thumb for raising pigs outdoors is 6 – 10 pigs per acre, but this is wholly dependent on your pasture.

To determine capacity for this hybrid swine operation (sows only):

- I used the footprint of the pens that I determined to be a CFO (Pens P1A – P6A) as shown on Google Earth Pro Aerial Imagery dated October 1, 2003 (page 3 of Appendix K),
- I then determined the pen sizes (footprint of enclosures) using Google Earth Pro (**Appendix L**) which was consistent with the pen sizes (footprint of enclosures) provided by the County of Stettler (page 9 of Appendix J), and
- I used the number of hybrid swine (700 sows), as claimed by the operator, to calculate the density (number of hybrid swine per acre).

#### **Pen Area/Size (Acre)**

<b>Pen</b>	<b>Google Earth Pro (2003)</b>	<b>County of Stettler – Pen Size (Acre)</b>
P1A	3.14	(#6) 3.29
P2A	1.28	(#7) 1.28
P3A	0.65	(# 12 & 13) 0.48
P4A	3.02	(#17 & 22) 2.82
P5A	1.94	(#18) 1.98
P6A	<u>2.17</u>	<u>(#14, 15 &amp; 19) 2.27</u>
<b>Total</b>	<b>12.2 acres</b>	<b>12.12 acres</b>

#### **# of Sows divided by the Pen Area (Acres) = Livestock Capacity**

- 700 sows / 12.2 acres = 57 sows/acre

Based on this analysis, the capacity of this CFO based on 57 sows/acre is 700 (sows) hybrid swine farrow to finish.

#### **4.5 Was the CFO above AOPA threshold on January 1, 2002?**

The AOPA threshold number for an approval for hybrid swine (sows) farrow to finish based on my calculations, provided in section 2.1 above, is 175+. In section 4.4 above, I found that this CFO had capacity for 700 (sows) hybrid swine farrow to finish, which is over the threshold.

Accordingly, the CFO's livestock capacity was above threshold on January 1, 2002, and it has a deemed permit.

#### **4.6 Reasonable range of physical capacity**

The Grandfathering (Deemed Permit) Policy notes at 6.3.2 that, while Technical Guideline Agdex 096-81 Calculator for Determining Livestock Capacity of Operations as They Existed on January 1, 2002, is a tool for determining physical capacity, field services staff have discretion in how they use the tool. For example:

- a. If the operator had a different management practice that doesn't follow the guideline, discretion can be exercised as long as the rationale is explained.

I assessed whether the claimed capacity of 4,600 hybrid swine (700 sows) farrow to finish is within a reasonable range of the physical capacity on January 1, 2002 – in other words, would the claimed 4,600 hybrid swine (700 sows) farrow to finish have fit into these pens in 2002?

The NRCB's Calculator for Determining Livestock Capacity of Operations as They Existed on January 1, 2002, uses a space allocation (ft<sup>2</sup>/animal) of 20 ft<sup>2</sup> for feeders/boars > 400 lbs. There is no calculation for sows, so I used feeders/boars >400 lbs. as it was the closest category to sows. Although, this calculation is based on barn area, I was able to calculate the number of swine that would fit in 12.2 acres of barn area:

- 12.2 acres = 531,432 ft<sup>2</sup>
- 531,432 ft<sup>2</sup> divided by 20 ft<sup>2</sup>/animal = 26,572 animals

Therefore, the claimed capacity of 4,600 hybrid swine (700 sows) farrow to finish in a confined outdoor setting would easily "fit" in the 12.2 acres if those acres were considered one big barn.

Using the Canadian Small-Scale Pig Farm Manual (August 2021) rule of thumb of 6 – 10 pigs for acre (outdoor setting) the livestock density calculations are as follows:

- 12.2 acres x 6 pigs/acres = 73 pigs
- 12.2 acres x 10 pigs/acres = 122 pigs

The calculations above use indoor confined and outdoor grazing situations, but do not account for an outdoor confined setting. Therefore, it has been determined that the claimed capacity of 700 sows is within a reasonable range of the physical capacity of the CFO on January 1, 2002.

## **5.0 Affected persons and directly affected parties**

Section 11(5) of the Administrative Procedures Regulation under AOPA requires that an inspector's decision report on a grandfathered (deemed) permit determination include reasons on whether affected persons who made a submission are directly affected parties.

Directly affected parties may have their response considered in a grandfathering determination and may submit a request to the NRCB's Board for a review of a grandfathering determination. If not directly affected, they may not have these options.

Affected persons in this determination were the municipality in which the operation is located (County of Stettler); and all neighbours who own or occupy land within a 1.5 mile notification distance. By proxy through section 19 of AOPA, these are determined by section 5 of the Part 2 Matters Regulation.

"Directly affected parties" are typically a subset of "affected persons." Under section 19(6) of AOPA, the applicant for an approval and municipalities that are "affected persons" are automatically directly affected parties. As such, Rosanna Walker Farm Ltd. and the County of Stettler are directly affected parties.

In deciding who else would be considered a directly affected party, I referred to the NRCB's Approvals policy section 7.2.1 paragraph 2 which states "*The NRCB presumes that persons who reside on or own land within the notification distance also qualify for directly affected party status, if they provide written response to the notice within the posted response deadline*".

No written responses were received from neighbours within the notification radius. Based on this, I conclude the following to be considered directly affected parties:

- Rosanna Walker Farm Ltd.
- County of Stettler

## **6.0 Status of deemed permit today**

### **6.1 Abandonment**

While a grandfathering determination is limited to a point in time – January 1, 2002 – the NRCB also takes this opportunity to assess the validity or status of a deemed permit, today. In other words, for a permit that is deemed under AOPA, does that same permit exist with the same terms in 2025. This assessment may be useful to provide certainty to prospective buyers, sellers or lenders, municipalities, regulators (such as the NRCB), and the owner and operator of the CFO.

In a decision concerning a grandfathered (deemed) permit determination (RFR 2020-04 *Stant Enterprises Ltd.* at pg. 4), the NRCB Board implied that where 18 years have passed since the time window used in a grandfathering, it may be appropriate to evaluate a question of abandonment. If a facility were abandoned, that might invalidate its deemed permit today. The [NRCB's Operational Policy, 2016-3 Permit Cancellations \(updated April 23, 2018\)](#) guides how to assess whether an operation or facility is abandoned. The policy also directs the approval officer (or inspector) to consider:

- the CFO's current use, if any
- the CFO's current condition
- what, if any, steps are being taken to keep the CFO's facilities in condition such that they could resume being used for livestock management without major upgrades or renovations
- when the CFO stopped being used, and the owner's reason for stoppage
- whether the operation changed ownership during the period of disuse
- the owner's reason for ceasing or postponing use and owner's intent with respect to future use of the CFO
- the value of CFO facilities (independent of their permitted status) and the cost of reconstructing them if reconstruction is needed.

From my observations, information obtained during my site inspection, oral and written testimony provided by the operator, aerial imagery, and Alberta Land Titles, I was able to assess the status of the site.

After reviewing historical aerial photographs, internal and external records, verbal discussions with the owner/operator, written correspondence and statements from the operator and employees, and a visual site inspection of the current state of the facilities on September 19, 2024, I conclude that the CFO, has been well maintained, has continued to be operational, and

the owner's intent has always been to keep the CFO in operation, and therefore is not considered abandoned.

## **6.2 Disturbed liner**

The Grandfathering (Deemed Permit) Policy states that facilities that are deemed to have an AOPA permit retain that deemed status only as long as the essential conditions of those facilities remain as they were on January 1, 2002.

The policy objective behind grandfathering is to protect legitimate expectations and reduce unfairness to operators who did not receive adequate notice of AOPA Part 2 taking effect from being expected to conform to the "new" standards. When AOPA was being developed, the expectation was that, over time, older facilities would adhere to AOPA's requirements as they were upgraded or replaced. The idea is that, prior to AOPA, operators made their investment decisions based on the rules as they stood at the time, and that it would be unfair to subject those operators to the new rules.

If an operator substantially changes the liner of a grandfathered manure storage facility or collection area, then the policy objective behind grandfathering that liner is erased. In addition, as a general rule, if a deemed facility is changed in a way that constitutes "construction" under AOPA, including the NRCB's interpretation, then that facility will lose its deemed status. This rule applies even where the "construction" does not alter the existing liner (e.g. but where capacity of manure storage or collection increases). Further explanation of what constitutes "construction" is provided in [NRCB Operational Policy 2012-1: Unauthorized Construction](#), and [Livestock Pen Floor Repair and Maintenance Fact Sheet](#).

In this case, there is no information that any liners or protective layers for the CFO facilities were disturbed in a way that would constitute "construction" and would invalidate the deemed permit.

## **7.0 Conclusion**

Having reviewed all the evidence listed above, I have determined that on January 1, 2002, the hybrid swine operation at SE 02-035-17-W4M, currently owned by Rosanna Walker Farm Ltd., and operated by Ralph Walker:

- existed as a hybrid swine operation consisting of both CFO and SFBS facilities,
- a cow/calf SFBS area
- the CFO portion of the operation, as identified in Appendix M, was above permitting thresholds under AOPA on January 1, 2002,
- does not have the same footprint today (for confining livestock) that it did on January 1, 2002. The footprint of the CFO on January 1, 2002, included six livestock pens totalling an area of approximately 12.2 acres (Appendix L) and consisted of 2 barns and 4 quonsets/open face shelters (page 3 of Appendix K). The CFO portion of the footprint today, covers approximately two thirds of the quarter section (page 4 of Appendix K), this extra footprint is potentially considered unauthorized construction, at this time, and will be addressed separate from this grandfathering determination request,
- was not issued any NRCB or municipal permits,
- was operating a hybrid swine farrow to finish operation on January 1, 2002,
- had the capacity to confine 700 hybrid swine (sows only) farrow to finish which is above AOPA threshold levels,

- its claimed capacity of 4,600 hybrid swine (700 sows only) farrow to finish is within a reasonable range of the physical capacity of the operation on January 1, 2002.

**Therefore, under section 18.1 of AOPA, the owner or operator of the CFO has a deemed approval within the specified footprint (page 3 of Appendix K) for the capacity for 700 (sows) hybrid swine farrow to finish.**

I have determined that the CFO has not been abandoned, has not had any of its liners disturbed, and the deemed NRCB permit under AOPA is still valid today. Please see Deemed (Grandfathered) Approval PR25001.

Furthermore, I conclude that the only directly affected parties of this decision are Rosanna Walker Farm Ltd., and the County of Stettler.

April 11, 2025

(original signed)  
Tracey Krenn  
Inspector

## **8.0 Appendices**

- A. Grandfathering Determination Request Application January 20, 2025
- B. Email from Ralph Walker February 12, 2025
- C. Historical Aerial Imagery
- D. RC11090 Letter November 7, 2011
- E. Site Layouts & Pictures September 19, 2024
- F. Grandfathering Questionnaire for Operator
- G. Email from Ralph Walker February 10, 2025
- H. Email from Rodney Grams March 13, 2025
- I. Email from Rodney Grams March 23, 2025
- J. County of Stettler Response March 26, 2025
- K. Pen Layout 2003 & 2024
- L. Livestock Pen Area (Acres)



## Grandfathering Determination Request

Request under the *Agricultural Operation Practices Act* (AOPA) for a grandfathering determination for a confined feeding operation (CFO), manure collection area (MCA), or manure storage facility (MSF)

**NRCB USE ONLY**

NRCB Grandfathering Number

PR25001

Date Stamp

**NRCB APPLICATION**  
**20 JAN 2025**  
**RECEIVED**

**CONTACT/OWNER INFORMATION**

Name of owner: Rosanna Walker		Corporate Name (if applicable): Rosanna Walker Farms Ltd. (1998)	
Name of person making request: Ralph K. Walker			
Address: (Street/P.O. Box) 95 Harvest Glen Rise NE			
City/Town: Calgary	Province: Alberta	Postal Code: T3K 4C1	

**LOCATION FOR WHICH GRANDFATHERING DETERMINATION IS REQUESTED**

Legal Land Description: SE-2-35-17-4	(Qtr-Sec-Twp-Rg-W Mer)
County/Municipal District: Stettler	
Is the person making the request the registered landowner?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no, please attach letter of consent signed by all landowners)	
Does this legal land location have an existing permit(s) for CFO facilities? (e.g. municipal development permit.):	
<input type="checkbox"/> Yes (if yes please provide a copy) <input checked="" type="checkbox"/> No    Permit(s) #:	

**Claimed Grandfathered Livestock Capacity** (Capacity of the enclosures On **January 1, 2002**)

Livestock category and type	Claimed grandfathered livestock capacity
Swine	4,500 summer months
Cattle	180 winter months

**Claimed Grandfathered Facilities** (On **January 1, 2002**)

Facility Name	Dimensions Length x width (x depth as applicable) (m)	Description of management of the facility (Seasonal use, movement of livestock, type of livestock etc.)
Shop		Ralph is having difficult time recalling dimensions and config
pens		Conferring with lawyer.
feed storage yard		

# Grandfathering Determination Request

**Information to support grandfathering determination request:** (Provide all relevant information to support the grandfathering claim. This can include, permits issued prior to January 1, 2002, records supporting the claimed capacity, photographs, details of facilities used to confine livestock, site layout plan, etc. Attach pages as required.)

Types of Records for Years 2000-2004	Yes	No	Comments
Aerial imagery ( <i>old farm photos</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Photographs ( <i>personal photos taken of animals/facilities</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Livestock Purchase Records ( <i>auction market receipts</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Livestock Sales Records ( <i>auction market receipts</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Financial Records ( <i>Taxes</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Feed, Straw, Mineral Purchase Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Government Support Program Records ( <i>GRIP, NISA</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Premises Identification Registration Records	<input checked="" type="checkbox"/>	<input type="checkbox"/>	CCIA January 2000
Quota Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Veterinary Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Manifests	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Calving/Farrowing/Lambing etc. Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Livestock Health Records ( <i>records of livestock treatments/vaccinations</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Purchases of Livestock Holding/Handling Equipment ( <i>poultry cages, dairy cow beds/stalls, farrowing crates</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Testimonies from Employees or Family Members ( <i>that worked on the operation in 2002-2004 and could be contacted now</i> )	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Manager Rod Grams included. Others from Neighbours to follow
Building and Construction Records ( <i>concrete bunks, buildings, sheds, slab fences, barns, waterers, etc.</i> )	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Any Diaries, Journals or Daily Logs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>	



# Grandfathering Determination Request

## REQUEST DISCLOSURE

I acknowledge that this information is collected under the authority of the *Agricultural Operation Practices Act*, is subject to the provisions of the *Freedom of Information and Protection of Privacy Act*, and shall be deemed public unless the NRCB grants a written request that certain sections remain private.

I, the owner, or agent of the owner, have read and understand the statements herein and acknowledge that the information provided in this application is true to the best of my knowledge.

Jan. 20, 2025

Date of signing

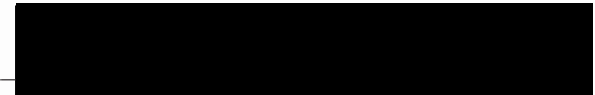
Rosanna Walker Farm Ltd.

Corporate name (if applicable)

Signature

Ralph Walker

Print name



**This contact information is only for NRCB, municipal, and referral agency use, and is not for public disclosure.**

### Owner Contact Information

Name:

Rosanna & Ralph Walker

Corporate Name (if applicable):

Rosanna Walker Farm Ltd.

Contact  
Numbers

Business:



Cell:

Home:



Email:



### Person (Other than Owner) Requesting the Determination Contact Information (if applicable)

Name:

Relationship to Owner:

Contact  
Numbers

Home:

Cell:

Email:

To whom it may concern;

My name is Rodney Grams. This is in regards Heritage Meats in The County Of Stettler #6 owned by R Walker/GC Marketing. *SE-2-35-17 w4*

I worked part time there from 1998-2001 and then I started working full time. While I was full time, there were wild boars farrow to finish. 4200 to 4500 head. With the animals going for meat to Japan, and some went to hunt farms in USA, as well as meat markets in Canada. There were approximately 100 head of cow calf pairs there and in later years up to 220 head in winter months. With all going out to pastures in spring to late fall and back to farm to feed and calve out in spring. Then they were sent back out to pastures in late spring.

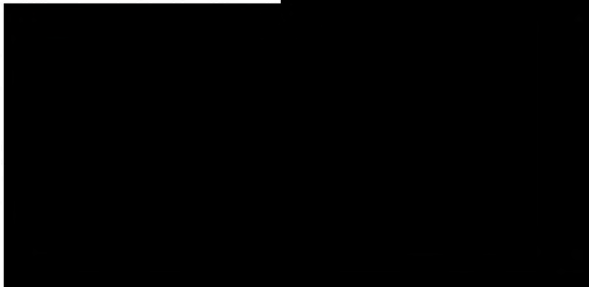
On the hog end when I started we used all the drugs the vets told us to use. With still a high death lose<sup>s</sup>. So we switched to a more natural way to raise them. It worked out well.

This farm has kept a lot of people in jobs over the years. Also bought a lot of grain, and hay from many local growers. I worked there full time until 2018 and go there still and do odd jobs when needed

Sincerely

Rodney Grams

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## Appendix B - Email from Ralph Walker February 12, 2025

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Tracey RE: : Rod's response to Tracey and NRCB File PR25001 Grandfathering Determination Request - Rosanna Walker Farms Ltd. (1998)  
**Date:** Wednesday, February 12, 2025 10:09:19 PM

---

This sender is trusted.

Hi Tracey: Rod's answer is always the correct answer because Rod solely managed the farm during this time period. Hence, go with total swine of 4600 per year. Rod can also confirm the cow calf capacity on January 1 2002 if you require Tracey. All cattle are always sent off this quarter to pasture till October 31<sup>st</sup> each year. Thanks from Ralph.

---

**From:** Tracey Krenn [mailto:[tracey.krenn@nrcb.ca](mailto:tracey.krenn@nrcb.ca)]

**Sent:** February-11-25 4:22 PM

**To:** [REDACTED]  
[REDACTED]

**Subject:** RE: : Rod's response to Tracey and NRCB File PR25001 Grandfathering Determination Request - Rosanna Walker Farms Ltd. (1998)

Good afternoon, Ralph,

We are getting ready to send out the notification for the grandfathering determination request. I just need you to confirm the total claimed grandfathered livestock capacity as of January 1, 2002.

On the grandfathering determination application, you stated there was a total of 4,500 swine, however in the email below from Rod it states the total was 4,600.

Can you please confirm the total claimed grandfathering livestock capacity on January 1, 2002, that you are applying for.

Kind regards,

**Tracey Krenn**

Inspector

**Natural Resources Conservation Board**

#303, 4920 – 51<sup>st</sup> Street

Red Deer, AB T4N 6K8

Tel: 403-318-8199

Email: [tracey.krenn@nrcb.ca](mailto:tracey.krenn@nrcb.ca)

Website: [www.nrcb.ca](http://www.nrcb.ca)

*This communication, including any attachments, is intended for the recipient to whom it is addressed, and may contain confidential, personal, or privileged information. If you are not the intended recipient of this communication, please contact the sender immediately and do not copy, distribute, or take any action in reliance on it. Any communication received in error, or subsequent reply, should be double-deleted or destroyed without making a copy.*



**Please do not print this email unless absolutely necessary. The trees will thank you!**

---

**From:** Ralph Walker [REDACTED]

**Sent:** February 10, 2025 9:32 AM

[REDACTED]

**Subject:** FW: : Rod's response to Tracey and NRCB File PR25001 Grandfathering Determination Request - Rosanna Walker Farms Ltd. (1998)

Hi Tracey: I got this email from Rod Grams this morning . Have you received it now? Do you need anything else from any of us at this time regarding this GrandFathering Application. Thanks from Ralph.

---

[REDACTED]

**Subject:** Rod's response to Tracey and NRCB File PR25001 Grandfathering Determination Request - Rosanna Walker Farms Ltd. (1998)

Hello Tracey et.al. at the NRCB: We raised and slaughtered 4600 head per year for the years in question. 200 sows after their 2<sup>nd</sup> litter which averaged 7 per litter which equals  $200 + 1400 = 1600$  head to slaughter each year. Plus 500 head of 1<sup>st</sup> litter sows which averaged 5 per litter =  $500 + 2500 = 3000$  head to slaughter each year. The babies take 1 year to finish to slaughter on these outside raised hybrid swine. The final total of  $200 + 500 = 700$  sows and 3900 head of finished yearling every year. Hopefully, this explanation I just provided is clear and understandable. Lastly, if you have any other questions please phone me Rod [REDACTED]

[REDACTED] Thanks from Rod Grams on my Endiang Farm just 4 miles east on HWY 589 from the Rosanna Walker Farms that I fully operated and managed for the years in question. Notice both of said farms are in the County of Stettler.

---

**From:** Tracey Krenn [<mailto:tracey.krenn@nrcb.ca>]

[REDACTED]



## Appendix C - Historical Aerial Imagery

File: RC24043

Location: SE2-35-17-W4M

Operation: Rosanna Walker Farm Ltd. (Canadian Heritage Meats)



Valtus 1999 - 2003



Google Earth Pro October 1, 2003



Google Earth Pro – April 30, 2007





Valtus 2011





Valtus 2013



Valtus 2015



Google Earth Pro - July 20, 2018





Google Earth Pro – September 1, 2019



Valtus 2022





Google Earth Pro – June 5, 2024

Tim Jespersen

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**From:** Tim Jespersen  
**Sent:** Monday, November 07, 2011 10:35 AM  
**To:** 'Ralph Walker'  
**Subject:** NRCB Complaint RC11090  
**Attachments:** Walker Cattle letter.doc

Dr. Walker, the attached letter explains the involvement of the NRCB regarding surface water run off from your hog facility near Byemoor. As indicated, the file is concluded at this time. I wish to express to you that this matter was able to be resolved in a reasonably quick process particularly because of the complete cooperation and willingness to assist that was experienced and displayed during our involvement with your site manager, Rod Grams. The results of this investigation have been shared with the County of Stettler.

The NRCB file is considered concluded at this point, but I would anticipate and encourage further involvement from the County of Stettler in dealing with the surface water flow in the ditch near your facility.

*Inspector Tim Jespersen  
Field Services, Central Region  
Natural Resources Conservation Board  
Red Deer, Alberta  
403-506-4558 cell  
403-340-5325 office*

*Bcc to Stettler*

November 7, 2011

**Walker Cattle Company  
Byemoor, Alberta**

**Attention Dr. Ralph Walker:**

**Re: NRCB Complaint RC11190.**

On June 27 of 2011, the NRCB received a complaint regarding the runoff of manure laden water from your operation into the county ditch located on the east side of the facility. Subsequent investigation of this matter confirms that there was an issue that needed to be dealt with in terms of controlling run off from some of the pens associated to your hog facility.

During site inspections conducted and with the assistance of your site manager Rod Grams, I am completely satisfied that Mr. Grams will be addressing the run off issues simply by re-establishing the berm along the east side of the property. Mr. Grams has explained that the hogs associated to these pens have worn down the previous berming. It is also noted that the county ditch appears to be plugged, likely due to recent construction in the area, and that this has created a back up of surface water near your facility. I have brought this situation to the attention of Stettler County, in hopes that they may be able to resolve the flow backup in this ditch. I have c.c.ed this letter to the County as well.

One of the other concerns raised was whether your facility should be designated as a confined feeding operation, hence requiring appropriate permitting from the NRCB. With the assistance and full explanation of the management of the site from Mr. Grams, the NRCB is of the opinion that your facility does not meet the criteria generally associated to confined feeding operations and does not require permitting at this particular point. We do encourage you to continue to ensure that your manure management practices follow the generally accepted rules of short term storage and land spreading within a 7 month time frame.

I will consider this matter closed at this time. If any clarification or further assistance is required, please do not hesitate to contact me at the Red Deer office of the Natural Resources Conservation Board at 403-340-5325. Your cooperation in this matter is greatly appreciated.

Yours truly,

Tim Jespersen/Inspector  
Field Services/Central Region  
Natural Resources Conservation Board  
Cell # 403-506-4558

c.c. Stettler County; Scott Cunningham NRCB



## Appendix E - Site Layouts & Pictures September 19, 2004

Date: September 19, 2024

Operation: Canadian Heritage Meats – WALKER

Inspector: T. Krenn

File: RC24043

LLS: SE 02-35-17-W4M



Rye Field – Pregnant Moms

Farrowing Pen – Farrowing

Centre Pen – Breeding

Corner Pen – Farrowing

Isolation Pen – Castrated Boars

New NW Pen – Moms & Babies

New NE Pen – Moms & Babies

Triangle Pen – Empty

Teardrop Pen – Empty

West 1 – Pregnant Moms (16)

West 2 – Moms (14) & Babies (80)

West 3 – Pregnant Moms (25)

West 4 – Moms (25) & Babies (70)

**\*\*New NW & NE Pens are also used for over-wintering of the cow-calf herd/spring calving\*\***

Ritchie Pen – Moms (3) & Babies (20)

Old SW Pen – Pregnant Moms (17)

Dugout Pen – Moms (20) & Babies (?)

Chainlink Pen - Boars

Road Pen – Dry Sows (100)

North Quonset – Male Babies

South Quonset – Female Babies

Southeast pens – Pregnant Moms (15) & (14)

**C** refers cows (pens may be used for over-wintering)

**?** Did not get was this area was used for.





After entering north entrance along the east side of the site – 1<sup>st</sup> pen to the east (Farrowing Pen)



Looking north from the internal roadway at the Quonset Pen & Catch Pen





Looking north from the internal roadway at the Quonset Pen & Catch Pen



Looking northwest at the Corner Pen & Centre Pen from the internal roadway





2024-09-19, 12:08 PM  
+51.973050,-112.317352  
RC24043  
T. Krenn, Inspector

Looking northwest at the Corner Pen from the internal roadway



2024-09-19, 12:10 PM  
+51.973007,-112.318044  
Stettler County No. 6 AB  
RC24043  
T. Krenn, Inspector

Looking southwest at West 1 from the internal roadway





2024-09-19, 12:11 PM  
+51.973021,-112.318203  
Stettler County No. 6 AB  
RC24043  
T. Krenn, Inspector

Looking southeast at West 4 from the internal roadway



2024-09-19, 12:12 PM  
+51.973037,-112.318533  
Stettler County No. 6 AB  
RC24043  
T. Krenn, Inspector

Looking southwest at West 3 & 4 from the internal roadway





2024-09-19, 12:12 PM  
+51.973049,-112.318678  
Stettler County No. 6 AB  
RC24043  
T. Krenn, Inspector

Looking north at the northwest end of the Isolation Pen from the internal roadway



2024-09-19, 12:14 PM  
+51.972995,-112.319203  
Stettler County No. 6 AB  
RC24043  
T. Krenn, Inspector

Looking southwest at West 3 from the internal roadway





2024-09-19, 12:14 PM  
+51.972995,-112.319203  
Stettler County No. 6 AB  
RC24043  
T. Krenn, Inspector

Looking southwest at West 3 from the internal roadway



2024-09-19, 12:16 PM  
+51.973013,-112.319893  
Stettler County No. 6 AB  
RC24043  
T. Krenn, Inspector

Looking south at West 3 from the internal roadway





2024-09-19, 12:14 PM  
+51.972995,-112.319203  
Stettler County No. 6 AB  
RC24043  
T. Krenn, Inspector

Looking northwest at the Isolation Pen from the internal roadway



2024-09-19, 12:15 PM  
+51.973076,-112.319525  
Stettler County No. 6 AB  
RC24043  
T. Krenn, Inspector

Looking northwest at the Isolation Pen from the internal roadway





Looking south at West 2 from the internal roadway



Looking southwest at West 1 from the internal roadway



2024-09-19, 12:19 PM  
+51.972984,-112.320352  
Stettler County No. 6 AB  
RC24043  
T. Krenn, Inspector



Looking west at West 1 from the internal roadway

## Appendix F - Grandfathering Questionnaire for Operator

**Rosanna Walker Farms Ltd. Grandfathering Determination Request – NRCB File No. PR25001**  
**Location: SE02-035-17-W4M**

The Natural Resources Conservation Board (NRCB) is requesting your assistance with the grandfathering determination request for a hybrid swine operation located at SE02-035-17-W4M. We have prepared a list of questions to assist the NRCB in determining that on January 1, 2002:

- 1) The overall type of swine operation that existed on January 1, 2002
  - a. Confined feeding, seasonal feeding and bedding, or rotational grazing
- 2) The type of swine livestock at the operation
  - a. Farrow to finish, farrow to wean, farrow only, etc.
- 3) The overall footprint of the operation
- 4) The different management practices for all the outside pens and indoor facilities
- 5) Any changes or additions to the footprint, facilities, or management practices since 2002, until today.

For reference, aerial imagery of the operation located at SE02-035-17-W4M has been included, both an overview and a zoomed in version to show the pens and facilities that existed on or about January 1, 2002. Please note that due to the poor quality of the Valtus Aerial Imagery from 1999 – 2003, Google Earth Pro Aerial Imagery dated October 1, 2003, was used as it provides a clearer image of the site.

For ease of reference, I have highlighted the footprint of the pens on the aerial imagery (pg. 4). Please note the highlighted pen footprints are approximates only. If the pen footprints that I have highlighted are not correct, please make any additional markings on the aerial imagery as required and initial the changes.

Thank you in advance for your assistance and cooperation. Please contact me if you have any questions.

Overview of SE02-035-17-W4M (Valtus Aerial Imagery 1999 – 2003)





Overview of SE02-035-17-W4M (Google Earth Pro Aerial Imagery October 1, 2003)



**SE02-035-17-W4M Pen Footprints & Buildings (Google Earth Pro Aerial Imagery October 1, 2003)**



The questions on the following pages refer to the operation as it existed on or about January 1, 2002. The buildings (B1 – B6) and pens (P1 – P6) have been labelled accordingly. (Photo labelled by T. Krenn, Inspector)



**Person who provided the information in completing this form:**

<b>Please provide your full name:</b>	
<b>Please state your date of birth:</b>	
<b>Phone #:</b>	
<b>Email address:</b>	
<b>In 2002 what was your role at this operation:</b>	
<b>In 2002 what type of operation was it:</b>	

**Definitions/References:**

Reference to a “facility” includes all aspects of the operation (e.g., buildings, pens, dugouts, catch basins, etc.).

The *Agricultural Operation Practices Act (AOPA)*, *Part 2 Matters Regulation* defines a “confined feeding operation” (CFO) as:

Fenced or enclosed land or buildings where livestock are confined for the purpose of growing, sustaining, finishing, or breeding by means other than grazing and any other building or structure directly related to that purpose but does not include residences, livestock seasonal feeding and bedding site, equestrian stables, auction markets, race tracks or exhibition grounds;

“Seasonal feeding and bedding site (SFBS) is defined in AOPA as an “an over-wintering site where livestock are fed and sheltered.”

Please answer the following questions relating to the indoor facilities (buildings) and outdoor pen areas at SE02-035-17-W4M as highlighted on Google Earth Pro Aerial Imagery October 1, 2003 (pg. 4 of this document).

<b>B1 – Indoor Facility</b>	
1. In 2002 what was the facility used for (farrowing, feeders, sows, boars, cow/calf, etc.)?	
2. Was the facility used all year round or seasonal, what months?	
3. What type of animals were in the facility?	
4. How many animals were in the facility?	
5. If the management of this facility has changed since 2002, when and why did this change occur?	
6. What is the facility used for today?	
<b>B2 – Indoor Facility</b>	
1. In 2002 what was the facility used for (farrowing, feeders, sows, boars, cow/calf, etc.)?	
2. Was the facility used all year round or seasonal, what months?	
3. What type of animals were in the facility?	
4. How many animals were in the facility?	
5. If the management of this facility has changed since 2002, when and why did this change occur?	
6. What is the facility used for today?	
<b>B3 – Indoor Facility</b>	
1. In 2002 what was the facility used for (farrowing, feeders, sows, boars, cow/calf, etc.)?	
2. Was the facility used all year round or seasonal, what months?	

3. What type of animals were in the facility?	
4. How many animals were in the facility?	
5. If the management of this facility has changed since 2002, when and why did this change occur?	
6. What is the facility used for today?	
<b>B4 - Indoor Facility</b>	
1. In 2002 what was the facility used for (farrowing, feeders, sows, boars, cow/calf, etc.)?	
2. Was the facility used all year round or seasonal, what months?	
3. What type of animals were in the facility?	
4. How many animals were in the facility?	
5. If the management of this facility has changed since 2002, when and why did this change occur?	
6. What is the facility used for today?	
<b>B5 – Indoor Facility</b>	
1. In 2002 what was the facility used for (farrowing, feeders, sows, boars, cow/calf, etc.)?	
2. Was the facility used all year round or seasonal, what months?	
3. What type of animals were in the facility?	
4. How many animals were in the facility?	
5. If the management of this facility has changed since 2002, when and why did this change occur?	
6. What is the facility used for today?	

<b>B6 – Indoor Facility</b>	
1. In 2002 what was the facility used for (farrowing, feeders, sows, boars, cow/calf, etc.)?	
2. Was the facility used all year round or seasonal, what months?	
3. What type of animals were in the facility?	
4. How many animals were in the facility?	
5. If the management of this facility has changed since 2002, when and why did this change occur?	
6. What is the facility used for today?	

<b>P1 – Outdoor pen area</b>	
1. In 2002 what was the pen used for (farrowing, feeders, sows, boars, cow/calf, etc.)?	
2. Was this pen used all year round or seasonal, what months?	
3. Did this pen grow vegetation?	
4. How was the manure managed in this pen (spread within the pen or scraped and hauled out)?	
5. What type of animals were in this pen?	
6. How many animals were in this pen?	
7. How were the animals fed in this pen?	
8. Has the management of this pen ever changed from 2002 to today, if so, when and how did it change?	
9. What is the pen used for today?	

<b>P2 – Outdoor pen area</b>	
1. In 2002 what was the pen used for (farrowing, feeders, sows, boars, cow/calf, etc.)?	
2. Was this pen used all year round or seasonal, what months?	
3. Did this pen grow vegetation?	
4. How was the manure managed in this pen (spread within the pen or scraped and hauled out)?	
5. What type of animals were in this pen?	
6. How many animals were in this pen?	
7. How were the animals fed in this pen?	
8. Has the management of this pen ever changed from 2002 to today, if so, when and how did it change?	
9. What is the pen used for today?	
<b>P3 – Outdoor pen area</b>	
1. In 2002 what was the pen used for (farrowing, feeders, sows, boars, cow/calf, etc.)?	
2. Was this pen used all year round or seasonal, what months?	
3. Did this pen grow vegetation?	
4. How was the manure managed in this pen (spread within the pen or scraped and hauled out)?	
5. What type of animals were in this pen?	
6. How many animals were in this pen?	
7. How were the animals fed in this pen?	



8. Has the management of this pen ever changed from 2002 to today, if so, when and how did it change?	
9. What is the pen used for today?	
<b>P4 – Outdoor pen area</b>	
1. In 2002 what was the pen used for (farrowing, feeders, sows, boars, cow/calf, etc.)?	
2. Was this pen used all year round or seasonal, what months?	
3. Did this pen grow vegetation?	
4. How was the manure managed in this pen (spread within the pen or scraped and hauled out)?	
5. What type of animals were in this pen?	
6. How many animals were in this pen?	
7. How were the animals fed in this pen?	
8. Has the management of this pen ever changed from 2002 to today, if so, when and how did it change?	
9. What is the pen used for today?	
<b>P5 – Outdoor pen area</b>	
1. In 2002 what was the pen used for (farrowing, feeders, sows, boars, cow/calf, etc.)?	
2. Was this pen used all year round or seasonal, what months?	
3. Did this pen grow vegetation?	
4. How was the manure managed in this pen (spread within the pen or scraped and hauled out)?	
5. What type of animals were in this pen?	

6. How many animals were in this pen?	
7. How were the animals fed in this pen?	
8. Has the management of this pen ever changed from 2002 to today, if so, when and how did it change?	
9. What is the pen used for today?	
<b>P6 – Outdoor pen area</b>	
1. In 2002 what was the pen used for (farrowing, feeders, sows, boars, cow/calf, etc.)?	
2. Was this pen used all year round or seasonal, what months?	
3. Did this pen grow vegetation?	
4. How was the manure managed in this pen (spread within the pen or scraped and hauled out)?	
5. What type of animals were in this pen?	
6. How many animals were in this pen?	
7. How were the animals fed in this pen?	
8. Has the management of this pen ever changed from 2002 to today, if so, when and how did it change?	
9. What is the pen used for today?	

**General Questions relating to the operation on or about January 1, 2002**

<p>1. In 2002, when did you usually farrow?</p> <p>a. Has this changed since 2002, if so when and why?</p>	
<p>2. How many sows farrowed at one time?</p> <p>a. Has this changed since 2002, if so when and why?</p>	
<p>3. In 2002, when did you wean?</p> <p>a. Has this changed since 2002, if so when and why?</p>	
<p>4. In 2002, how long until the weaned piglet would reach finish/slaughter weight?</p> <p>a. Has this changed since 2002, if so when and why?</p>	
<p>5. In 2002, did you raise replacements sow and boars, how many annually?</p> <p>a. Has this changed since 2002, if so when and why?</p>	
<p>6. In 2002, what animals were raised indoors and outdoors?</p> <p>a. Has this changed since 2002, if so when and why?</p>	
<p>7. In 2002, was there any grazing period for the swine, if so, when?</p> <p>a. Has this changed since 2002, if so, when and why?</p>	
<p>8. In 2002, did any of the pens have all the fencing removed, and if so, was the pen area seeded to a vegetated crop during summer months?</p>	

9. Is the operation the same today as it was in 2002? If not, please explain.	
<b>How would you define the following terms:</b>	
• Sow	
• Farrow to finish	
• Farrow to wean	
• Farrow only	
• Feeders/Boars	
• Cow/Calf	
• Over-wintering	
• Rotational Grazing	
• Grazing period	
• Confined feeding	

In addition to the above requested information, please provide any photos or documentation on or about January 1, 2002. Please include the date of the photograph or documentation and who took the photograph or prepared the documentation.

Person completing the form:

\_\_\_\_\_  
Name (Print)

\_\_\_\_\_  
Date form completed

\_\_\_\_\_  
Signature



## Appendix G - Email from Ralph Walker February 10, 2025

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: : Rod's response to Tracey and NRCB File PR25001 Grandfathering Determination Request - Rosanna Walker Farms Ltd. (1998)  
**Date:** Monday, February 10, 2025 9:32:18 AM

---

This sender is trusted.

Hi Tracey: I got this email from Rod Grams this morning . Have you received it now? Do you need anything else from any of us at this time regarding this GrandFathering Application. Thanks from Ralph.

---

[REDACTED]

**Subject:** Rod's response to Tracey and NRCB File PR25001 Grandfathering Determination Request - Rosanna Walker Farms Ltd. (1998)

Hello Tracey et.al. at the NRCB: We raised and slaughtered 4600 head per year for the years in question. 200 sows after their 2<sup>nd</sup> litter which averaged 7 per litter which equals  $200 + 1400 = 1600$  head to slaughter each year. Plus 500 head of 1<sup>st</sup> litter sows which averaged 5 per litter =  $500 + 2500 = 3000$  head to slaughter each year. The babies take 1 year to finish to slaughter on these outside raised hybrid swine. The final total of  $200 + 500 = 700$  sows and 3900 head of finished yearling every year. Hopefully, this explanation I just provided is clear and understandable. Lastly, if you have any other questions please phone me Rod [REDACTED]

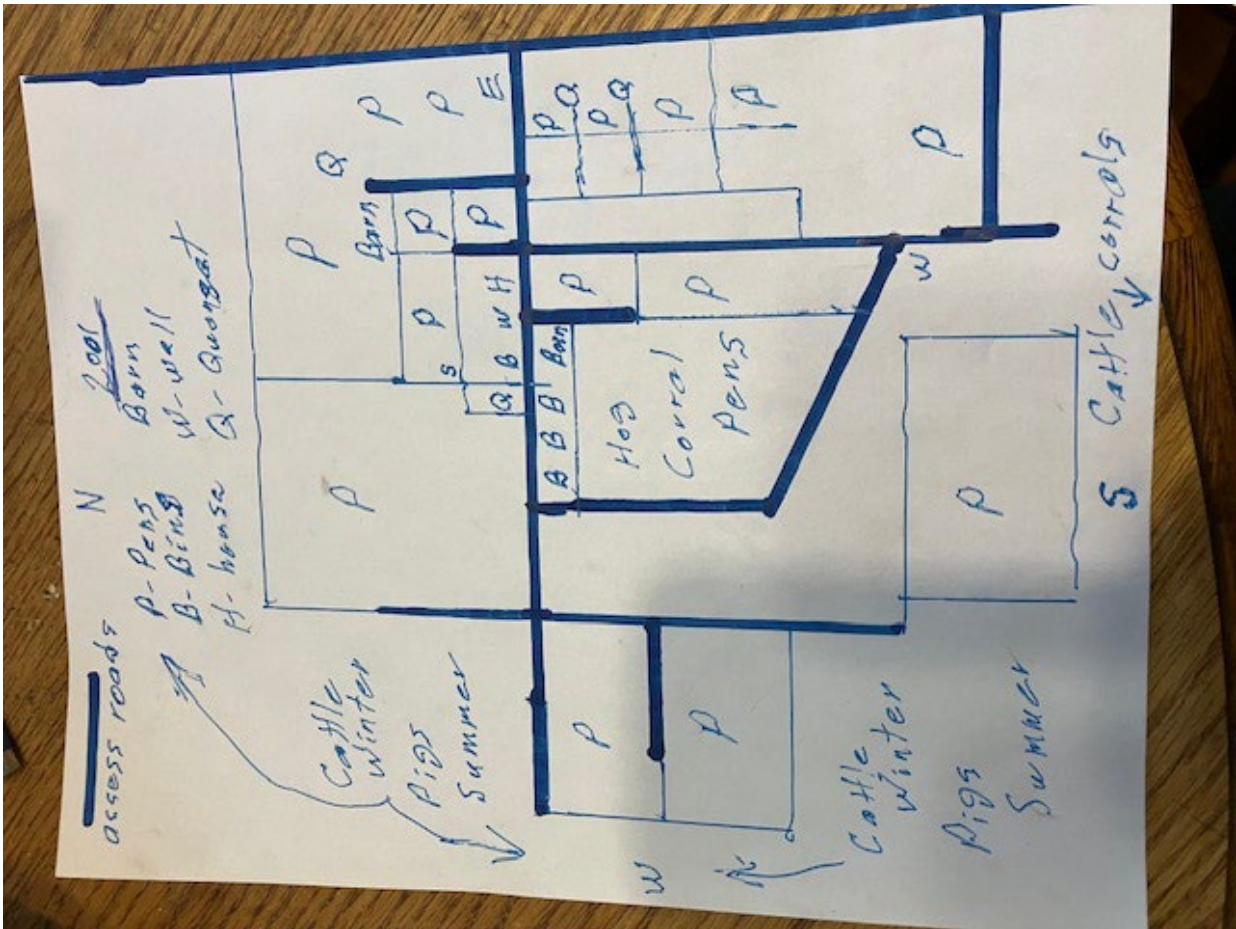
[REDACTED] Thanks from Rod Grams on my Endiang Farm just 4 miles east on HWY 589 from the Rosanna Walker Farms that I fully operated and managed for the years in question. Notice both of said farms are in the County of Stettler.

---

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Appendix H - Email from Rodney Grams March 13, 2025

From: [redacted]  
To: [Tracey Krenn](#)  
Subject: Rod grams  
Date: March 13, 2025 1:28:10 PM



Caution! This message was sent from outside your organization.

Sent from my iPhone. Give me a time I can call you tomorrow

## Appendix I - Email from Rodney Grams March 23, 2025

**From:** [REDACTED]  
**To:** [Tracey Krenn](#)  
**Subject:** Rosanna Walker Farm grandfathering  
**Date:** March 23, 2025 8:05:21 PM

---

Caution! This message was sent from outside your organization.

[Allow sender](#) | [Block sender](#) | [Report](#)

Dear Tracey Krenn;

March 23, 2025

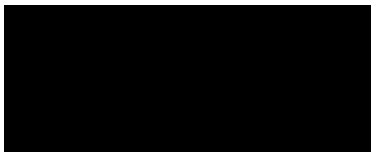
From Rodney W Grams

This is sent out for the farm of Rosanna Walker SE-02-35-17-04. After printing out the maps of farm, I could not see it clear enough to make out pens. This is a follow up to go with map I drew up. The entire whole quarter was used for the farrow to finish production of the outside mixed crossed porcine. That is still the same today. The outer pens were used for breeding and farrowing, then as they were weaned the little ones were moved to grower pens closer in the biotech buildings. Farrowing took place during the late spring, summer and early fall months. All farrowing was done outside with portable wind breaks, portable shelters, and large round straw bales. All pens have auto waters and there are also grain feeders in all pens, and also hogs are fed hay and straw. Free choice. All old manure and old bedding is piled, then hauled out to neighbors farmland and spread out as fertilizer in the fall.

The outer area from the main farm drawing is where cows are in winter months, for feeding and spring calving. Then when cows and calves go out to summer pastures, hogs go into that area to clean up excess feed for summer months to be a growing area for hogs. There are also grain feeders and waterer for hogs in these pens. Any new fencing out there are to comply to the new fencing regulations for hogs that were put in place. Any excess manure and excess waste feed is piled and hauled to neighbours field and is also spread for fertilizer. There are water catch basins in all pens for any extra drainage. These also turn into mud baths for hogs on hot days. There is one large fresh water dugout on south end, and 5 deep wells for water.

I hope this helps explain the maps and workings of the farm.

Rodney W Grams





## County of Stettler No. 6

Box 1270  
6602 – 44 Avenue  
Stettler, Alberta T0C 2L0  
T:403.742.4441 F: 403.742.1277  
[www.stettlercounty.ca](http://www.stettlercounty.ca)

March 21, 2025

Tracey Krenn, Inspector  
303, 4920 51 Street  
Red Deer, AB T4N 6K8  
[tracey.krenn@nrca.ca](mailto:tracey.krenn@nrca.ca)  
403-318-8199

Dear Ms. Krenn,

**RE: Rosanna Walker Farm Ltd. Grandfathering Determination - PR25001**


The County of Stettler writes in response to the notice provided by the NRCA requesting input on the operation of a confined feeding operation on the SE 2-35-17-W4M.

Attached to this letter are aerial photographs from 2003 and 2024 showing the expansion of the farm over 20 years. As this farm raises wild boar, we have conducted numerous inspections over the years under the Agricultural Pests Act, a summary of which is attached. We have also included a current pest notice which forms part of active enforcement on wild boar at large and pen fencing calculations done as part of the inspections leading to that enforcement.

Lastly, we wish to inform you that the County of Stettler has no record of a permit issued under our Land Use Bylaw prior January 1, 2002. At that time, a permit would have been required for an "Intensive Livestock Operation".

Please accept this letter as application for the County of Stettler to be considered a directly affected party. The keeping of wild boar and hybrids thereof requires management under the Agricultural Pest Act by the County of Stettler.

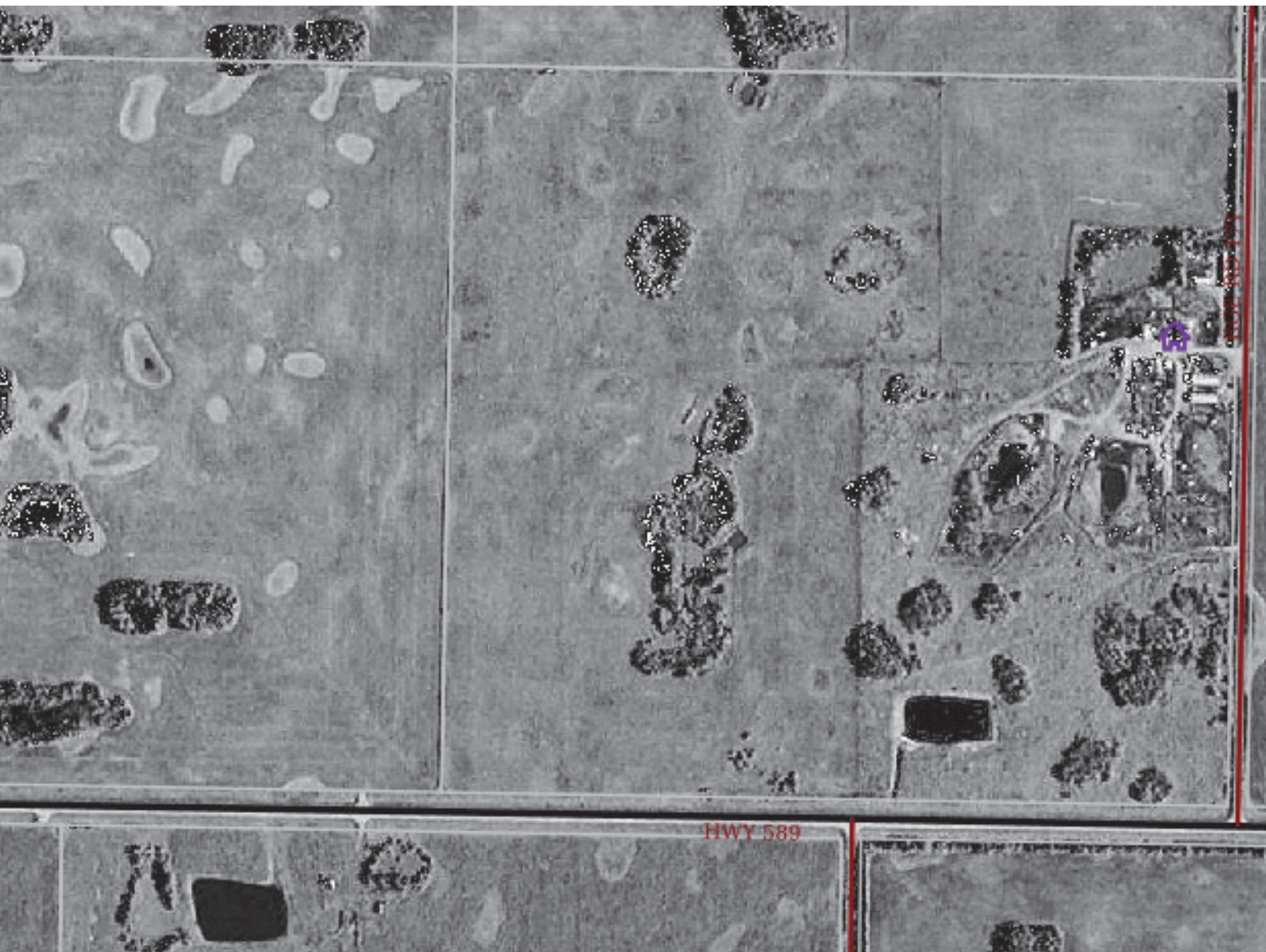
Sincerely,



Gregory Jackson  
Director of Operations  
Interim Agricultural Fieldman

Enclosures





**2003**

**Rosanna Walker Farm LTD**

**SE-2-35-17-4**



October 2, 2003







**2007**

**Rosanna Walker Farm LTD**

**SE-2-35-17-4**



**2015**

**Rosanna Walker Farm LTD**

**SE-2-35-17-4**





**2021**

**Rosanna Walker Farm LTD**

**SE-2-35-17-4**



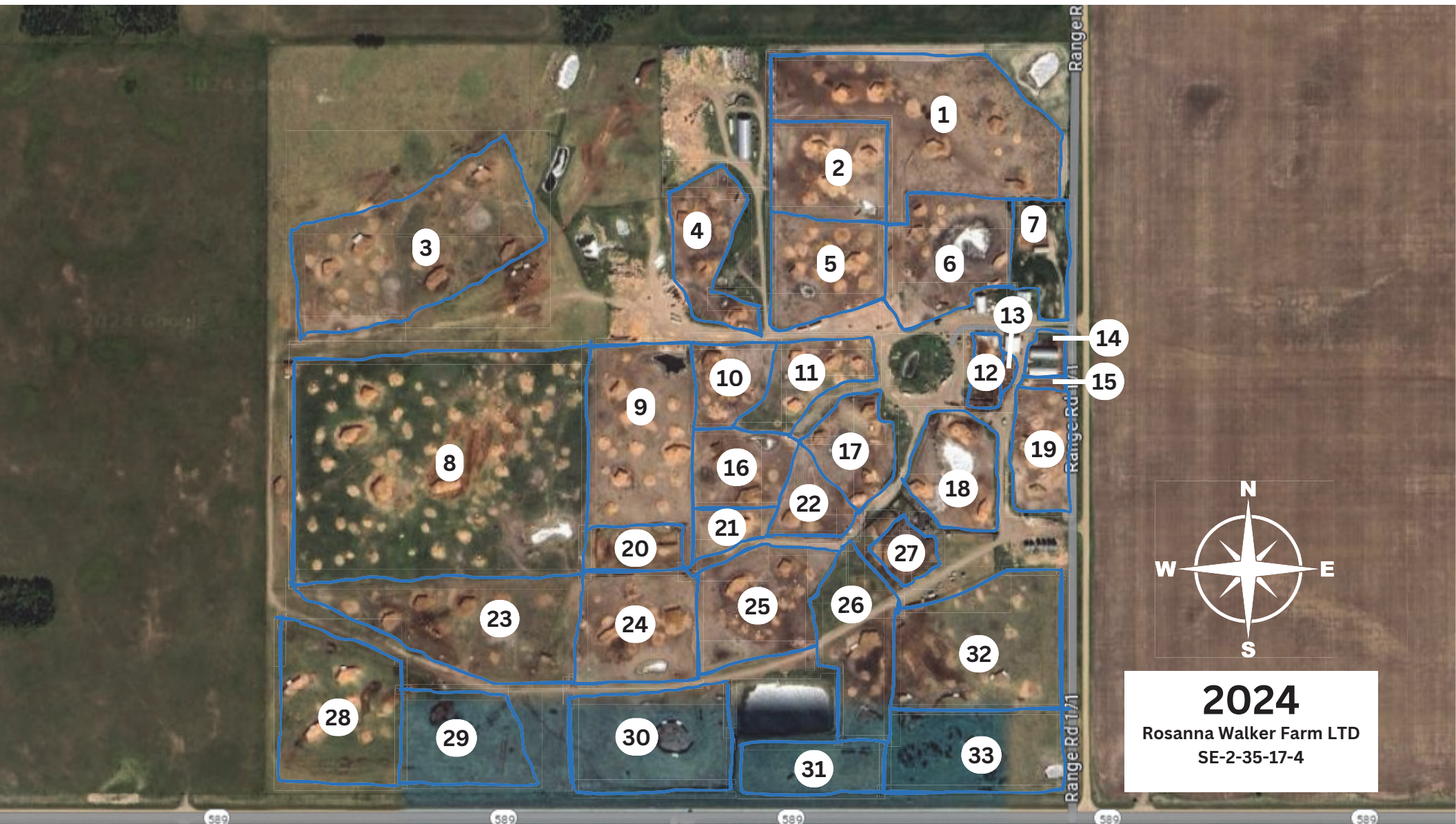


**2024**

**Rosanna Walker Farm LTD**

**SE-2-35-17-4**









2024

Rosanna Walker Farm LTD  
SE-2-35-17-4



## Pen Sizes

Approximate estimate

1	8.13	ac	24	3.04	ac
2	2.79	ac	25	3.04	ac
3	7.41	ac	26	2.57	ac
4	2.08	ac	27	0.74	ac
5	2.67	ac	28	4.79	ac
6	3.29	ac	29	1.98	ac
7	1.28	ac	30	3.88	ac
8	16.36	ac	31	1.71	ac
9	4.67	ac	32	6.03	ac
10	1.46	ac	33	3.09	ac
11	1.75	ac	TOTAL: 99 ac		
12	0.47	ac			
13	0.01	ac			
14	0.07	ac			
15	0.27	ac			
16	1.90	ac			
17	1.83	ac			
18	1.98	ac			
19	1.93	ac			
20	1.09	ac			
21	0.72	ac			
22	0.99	ac			
23	4.89	ac			



FORM 2

(Section 6(1))

NOTICE TO CONTROL PESTS

Agricultural Pests Act

PEST AND NUISANCE CONTROL REGULATION

**To:**

Dr. Ralph Walker (Occupant)  
95 Harvest Glen Rise NE Calgary, Alberta, T5K 4C1

and

Rosanna Walker Farm Ltd o/a NGM Naturally Grown Meats (Owner)  
95 Harvest Glen Rise NE Calgary, Alberta, T5K 4C1

---

You are hereby notified that the property located on the Southeast Quarter of Section 2, Township 35, Range 17, West of the 4<sup>th</sup> Meridian (SE-2-35-17-W4M), Alberta, as indicated on the diagram below, contains or is likely to contain or should be protected against Wild Boar (*Sus scrofa*) at large, which has been declared a pest by the *Pest and Nuisance Control Regulation* made under the *Agricultural Pests Act*, and you are directed to take the following measures:

1. Keep the main gate to the Lands closed and secured at all times except when entering or exiting the property;
2. Fully comply with the Minimum Containment Standards for Alberta Wild Boar Farms (September 16, 2015) on all perimeter fencing to prevent Wild Boar from being at large.



Figure 1. Aerial view of SE-2-35-17-W4M for which the pest notice is issued.

Measure #1 must be completed within **1 day** from the date of issue of this notice and Measure #2 must be completed on or before **12:00 pm May 30, 2025**, failing which action may be taken in accordance with the legislation referred to in the Alberta Agricultural Pests Act. This notice is issued under section 12(1) of the *Agricultural Pests Act*. An **appeal** against this notice may be served on the **municipal secretary**, accompanied by a deposit of **\$100**, before the expiry of the time limit stated above or the **period of 10 days from service of the notice**, whichever expiry-date occurs first, and otherwise made in accordance with the *Agricultural Pests Act*.

October 10, 2024

*Date of Issue*

Quinton Beaumont

Agricultural Pest Inspector, and Manager of Agricultural Operations  
County of Stettler No. 6  
403-742-4441 ext 128

Date	Inspector	Correspondence	Approx # Boar	Shortcomings	Next Action	Deadline	Notes
8/5/2014	Grady Owen	Inspection Report	800 - 850	failure of minimum containment standard, electrical shortcomings, fencing mesh size too large, non buried fence, inadequate height, post spacing too large, young wild boar noted outside of fence.	stake the bottom of all fencing containing farmed wild boar 1 m into the ground and add stakes spaced no more than 1.5 m apart	1-Oct-14	-
8/14/2018	Karl Vidal	Inspection Report	2000	in front pen, no secondary fence, boar need to be moved	-	-	-
12/17/2019	Stephan Desilets	Inspection Report and Risk Assessment of Hybrid Wild Boar Farm	1250	size too large, electrical shortcomings, fence not buried, no double fencing, signs of young boar outside of fence.	-	-	Risk Assesment - 75% adult males is pure wild boar, 50% adult females is pure strain wild boar
11/23/2022	Stephan Desilets	Inspection Report	1400 - 1500	fence height too short (<1.5m), fence not buried, electrical shortcomings, fencing mesh size too large, signs of young boar outside of fence.	Need smaller mesh fencing, work on secondary containment.	-	Boars and Sows shipped to California, and Manitoba
4/28/2023	Hannah McKenzie	Inspection Report	-	fence height too short (<1.5m), fence not buried, electrical shortcomings, fencing mesh size too large, signs of young boar outside of fence.	Due to lack of buried fence, suggested secondary fencing. Energize electric fence. Need smaller mesh fencing to contain piglets Double fence around all pens. Complete electric fence on inside of all pens and ensure minimum of 4000v.	Fall	-
8/21/2023	Hannah McKenzie	Inspection Report	2500	inner fence height too short (<1.5m), electrical shortcomings.	-	Fall	-
11/23/2023	Hannah McKenzie	Inspection Report	1156	insufficient voltage on electric fence. Failure to meet minimum containment standards (insufficient voltage on electric fence). Escaped wild boar (April 20, August 3, August 18, 2023) (6 boar total).	Complete electric fence on inside of all pens and ensure minimum of 4000v.	-	-
11/24/2023	Hannah McKenzie	Compliance Letter	-	Containment is in compliance with the exception of pens along the East side of property (no double fencing).	-	30-Nov-23	-
11/30/2023	Hannah McKenzie	Inspection Report	-	Temporary panels have been placed in biodeck pens as an effort for secondary fencing, these panels do not meet minimum containment standards. No mesh fencing and lots of gaps along bottom and sides, no electric wire. Observed tracks indicating boar escape. Rye pen also had insufficient height and electric fencing, evidence of boar escape. Temporary fencing on the biodecks will be permitted until the ground thaws but large gaps in the mesh and panels are unsatisfactory. Mesh fencing needs to be connected to existing fence then temporary containment will be acceptable.	-	-	-
2/28/2024	Hannah McKenzie	Inspection Report	-	Gate Status: May 10, 2023 – closed, August 16, 2023 – open, August 18, 2023 – open, August 23, 2023 – open, October 20, 2023 – open, January 8, 2024 – closed, February 6, 2024 – open, May 8, 2025 - open, June 10, 2024 – open Permanent secondary fencing only partially completed, no electric fence. Wild boar in pens that used to be for cattle, no electric fence and mesh fencing is too large, watched piglets breach the fence.	mesh fencing needs to be added to limit the risk of wild boar escape.	3/7/2023	letter will serve as a written warning and a copy will be placed in your administrative file.
3/5/2024	Hannah McKenzie	Compliance Letter	-				Road pen does not meet containment standards.
3/7/2024	Hannah McKenzie	Inspection Report	-				
6/10/2024	Hannah McKenzie	Information Letter	-		It is important to close the main gate, encouraged to find a solution to this ongoing issue.	-	-
8/9/2024	Hannah McKenzie	Inspection Report	700		Working with Stettler County to determine next actions	-	Isolation pen had electric fencing in place and met containment standards.
10/10/2024	Farrah Fischer on behalf of Quinton Beaumont	Form 2 Pest Notice	-	-	1. Keep the main gate to the Lands closed and secured at all times except when entering or exiting the property; 2. Fully comply with the Minimum Containment Standards for Alberta Wild Boar Farms (September 16, 2015) on all perimeter fencing to prevent Wild Boar from being at large.	5/30/2025	Hand delivered notice to both Rosanna and Ralph and had a brief discussion regarding the notice at 9:58 am. Peace Officer Aislinn Reule was there for assistance and monitoring. Inspector Fischer explained the notice and appeal process. Appeal deadline is October 24, 2024.  FILES IN APPEAL PACKAGE: Form 2 (Pest Notice), Minimum Containment Standards for Alberta Wild Boar Farms (2015), 2024-06-19 Letter from Hannah McKenzie (GOA Wild Boar Program Specialist) warning to keep gate closed, 2014-08-05 Wild Boar Farm Inspection Report (Grady Owen, Senior Investigation Officer, Inspection and Investigation Branch), 2024-08-09 Wild Boar Farm Inspection Report (Hannah McKenzie), Alberta Agricultural Pest Act (appeal process highlighted) and Regulation.



Pen	Perimeter Fence Length		Pen Area	
	ft	m	ha	ac
1	2,977	907	3.29	8.13
2	1,400	427	1.13	2.79
3	2,330	710	3.00	7.41
4	1,585	483	0.84	2.08
5	1,378	420	1.08	2.67
6	1,480	451	1.33	3.29
7	1,099	335	0.52	1.28
8	3,408	1,039	6.62	16.36
9	1,841	561	1.89	4.67
10	1,021	311	0.59	1.46
11	1,286	392	0.71	1.75
12	830	253	0.19	0.47
13	389	119	0.01	0.01
14	296	90	0.03	0.07
15	290	88	0.11	0.27
16	1,177	359	0.77	1.90
17	1,070	326	0.74	1.83
18	1,153	351	0.80	1.98
19	1,301	397	0.78	1.93
20	964	294	0.44	1.09
21	765	233	0.29	0.72
22	962	293	0.40	0.99
23	2,306	703	1.98	4.89
24	1,439	439	1.23	3.04
25	1,505	459	1.23	3.04
26	1,696	517	1.04	2.57
27	710	216	0.30	0.74
28	2,040	622	1.94	4.79
29	1,425	434	0.80	1.98
30	1,741	531	1.57	3.88
31	1,273	388	0.69	1.71
32	1,751	534	2.44	6.03
33	2,020	616	1.25	3.09
<b>SUM</b>	<b>46,908</b>	<b>14,298</b>	<b>40</b>	<b>99</b>
Average	1,421	433	1	3

## Appendix K - Pen Layout 2003 & 2024

### **Rosanna Walker Farms Ltd. Grandfathering Determination Request – NRCB File No. PR25001 Location: SE 02-35-17-W4M**

Aerial imagery of the operation located at SE 02-35-17-W4M includes both an overview and a zoomed in version to show the pens and facilities that existed on or about 2002 and their current configuration. Please note that due to the poor quality of Valtus Aerial Imagery from 1999 – 2003, Google Earth Pro Aerial Imagery dated October 1, 2003, was used as it provided a clearer image of the site.

In addition, the pen layouts as they existing on or about January 1, 2002, and September 19, 2024 (including pen uses) have been highlighted on the aerial imagery (pages 3 & 4) to provide the general layout but may not be exact.

#### **Overview of SE 02-35-17-W4M (Valtus Aerial Imagery 1999 – 2003)**



Overview of SE 02-35-17-W4M (Google Earth Pro Aerial Imagery October 1, 2003)





SE 02-35-17-W4M facilities and pen configuration (Google Earth Pro Aerial Imagery October 1, 2003)



Areas outlined in "yellow" show the areas of the CFO as of January 1, 2002. Areas outside of the CFO pens, are crop land or Seasonal Feeding and Bedding Sites (SFBS).

F1A – Quonset  
F2A – Barn  
F3A – Quonset  
F4A – Barn  
F5A – Quonset  
F6A – Quonset

Pens (P1A – P6A)

## Overview of SE 02-35-17-W4M (Google Earth Pro Aerial Imagery dated June 5, 2024)

September 19, 2024 - Pen Layout & Names as provided by Greg, Site Manager of Canadian Heritage Meats during the site inspection (Photo labelled by T. Krenn, Inspector).



- Pens existing **as of January 1, 2002**, are outlined in "yellow" and labelled (P1A – P5A)
- Pens constructed **after January 1, 2002**, are outlined in "blue" and labelled (P1B – P19B)

Pens uses as provided by Site Manager, Greg during site inspection September 19, 2024:

Rye Field – Pregnant Moms  
 Farrowing Pen – Farrowing  
 Centre Pen – Breeding  
 Corner Pen – Farrowing  
 Isolation Pen – Castrated Boars  
 New NW Pen – Moms & Babies  
 New NE Pen – Moms & Babies  
 West 1 – Pregnant Moms (16)  
 West 3 – Pregnant Moms (25)  
 Triangle Pen – Empty  
 Pens 18B – Pregnant Moms (15)

Ritchie Pen – Moms (3) & Babies (20)  
 Old SW Pen – Pregnant Moms (17)  
 Dugout Pen – Moms (20) & Babies (?)  
 Chainlink Pen - Boars  
 Road Pen – Dry Sows (100)  
 North Quonset – Male Babies  
 South Quonset – Female Babies  
 West 2 – Moms (14) & Babies (80)  
 West 4 – Moms (25) & Babies (70)  
 Teardrop Pen – Empty  
 Pen 19B – Pregnant Moms (14)

**\*\*New NW & NE Pens are also used for over-wintering of the cow-calf herd/spring calving\*\***



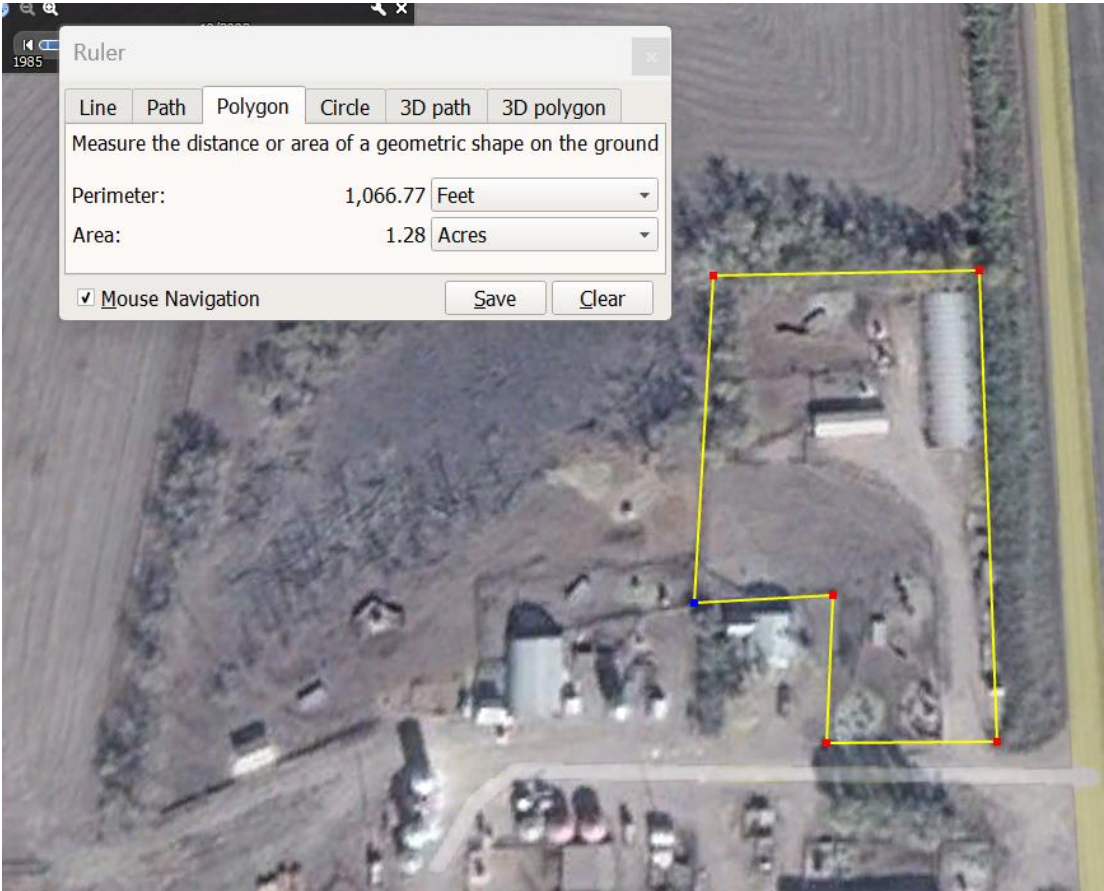
Appendix L - Livestock Pen Area (Acres)

PR25001 Rosanna Walker Farm Ltd. – Livestock Pen Area (Acres) – SE 02-35-17-W4M

P1A – Pen Area 3.14 Acres



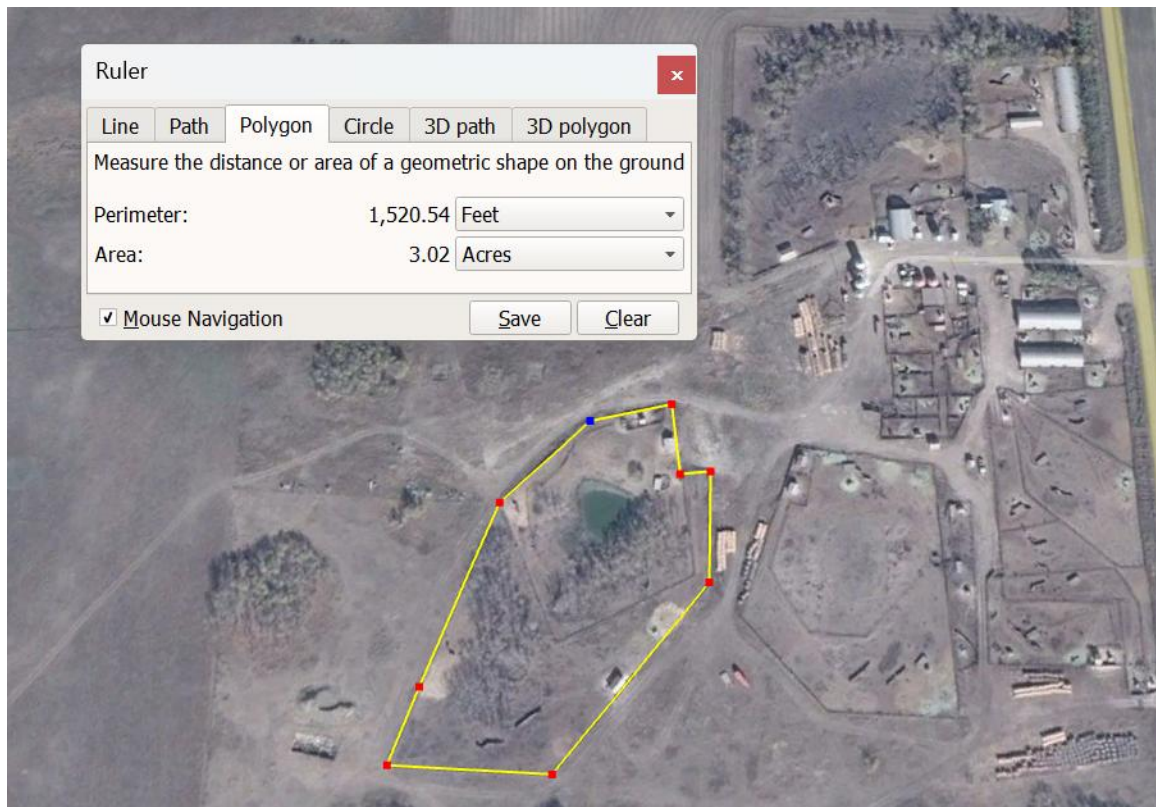
P2A – Pen Area 1.28 Acres



### P3A – Pen Area – 0.65 Acres



### Pen 4A – Pen Area 3.02 Acres

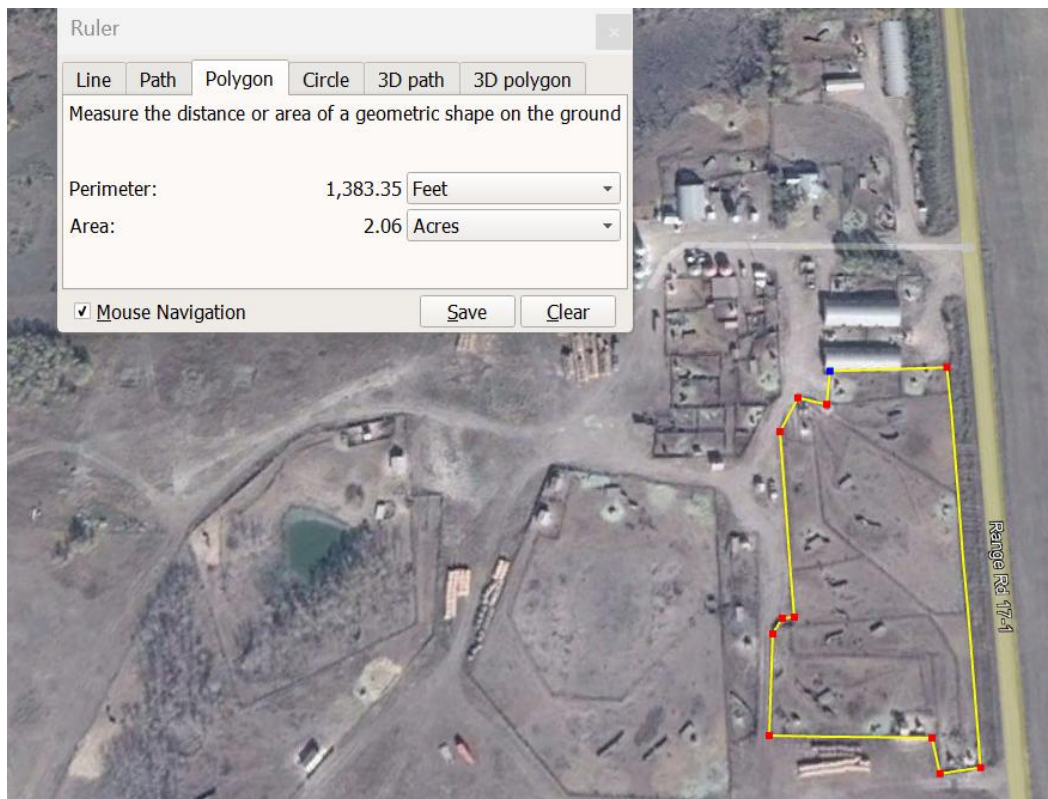


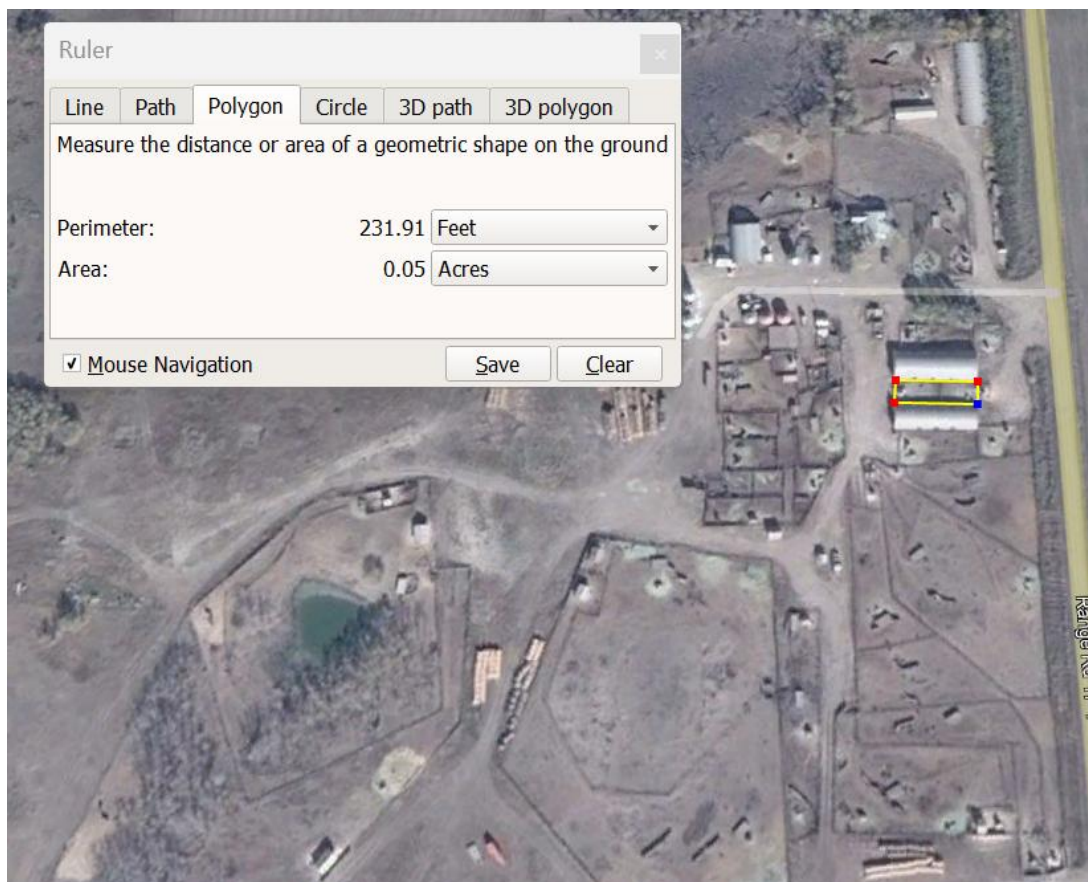
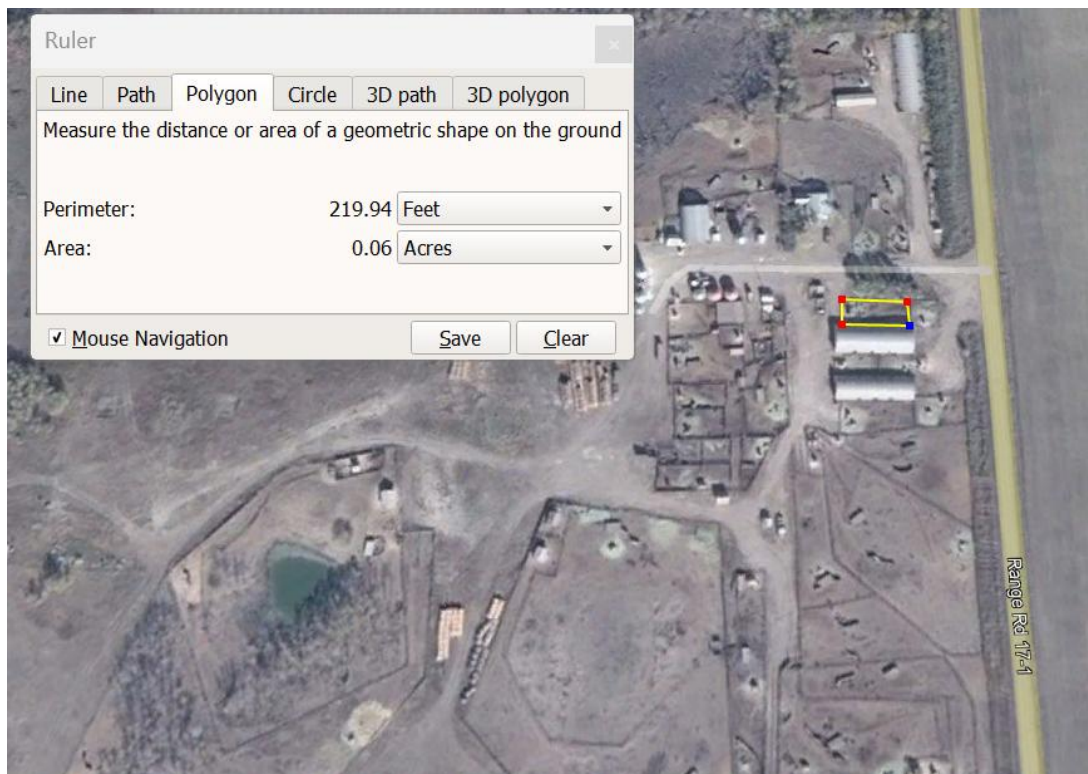


### P5A – Pen Area 1.94 Acres



### P6A – Pen Areas (2.06 + 0.06 + 0.05) 2.17 Acres





**Total Livestock Capacity**

P1A 3.14

P2A 1.28

P3A 0.65

P4A 3.02

P5A 1.94

P6A 2.17

**Total 12.2 Acres**