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AMENDING MUNICIPAL PERMIT CONDITIONS

Operational Policy 2016-1

Agricultural Operation Practices Act
January 26, 2016

TABLE OF CONTENTS

1. Introduction

Under section 18.1 of the *Agricultural Operation Practices Act* (AOPA), a confined feeding operation (CFO) is grandfathered under several circumstances. One circumstance is if the CFO had been issued a municipal development permit and that permit was in effect on January 1, 2002.

Alberta has 69 counties and municipal districts, many of which issued development permits for CFOs before 2002. Without provincial rules for permitting CFOs, each municipality adopted its own approach to choosing and drafting permit conditions.

Section 18.1(4) of AOPA states that, for CFOs that are grandfathered based on a municipal development permit, the "terms and conditions" of the CFO's "deemed" (i.e., grandfathered) permit "are those in the ... development permit…." With two exceptions, those terms and conditions "*continue to apply despite the regulations"* (emphasis added).

One of these exceptions is when the deemed permit is "amended in accordance with this Act."[1] The NRCB interprets this phrase as meaning that deemed permits can be amended to the same extent as, and following the same procedures applicable to, corresponding NRCB-issued permits. To date the majority of deemed municipal permits have not been changed. Many municipal permits include terms and conditions that are no longer necessary, are impractical to enforce, or are problematic for other reasons.

The purpose of this policy is to guide approval officers when they are deciding whether to amend terms or conditions in municipal permits.[2] Unless otherwise noted, the term "amend" is used to mean "re-write" or "delete entirely." "Conditions" refers to both terms and conditions. For NRCB policy regarding *adding* new terms or conditions to deemed municipal permits, see Operational Policy 2016-2: *Approval Officer Amendments Under Section 23 of AOPA*.

As with all NRCB operational policies, this policy can be modified when its strict application would be clearly unfair, or in other necessary and appropriate circumstances.

Part 2 of this policy, below, addresses the circumstances when approval officers can amend municipal permits on their own motion under section 23 of AOPA, and the process to follow under section 23. (These types of amendments are commonly known as "approval officer amendments.") Part 3 of this policy addresses when approval officers consider applications from CFO owners to amend municipal permits. The following two general principles apply to both types of permit amendments:

- **Permit conditions with more than one requirement**
  Individually numbered conditions may contain two or more actual requirements. Each requirement in a condition must be addressed separately, even if they are presented as one condition.
- **Permits must be grandfathered before they can be amended**
  As noted above, a municipal permit is grandfathered only if it was in effect on January 1,

1. Under the other exception, the conditions of a deemed permit may be trumped by the requirements of an enforcement or emergency order issued under AOPA (s. 18.1(4)(a)).

2. This policy draws from the NRCB board member decision *Sunterra Farms Ltd.*, Decision 2013-02/RA09046A (Apr. 12, 2013) and the Field Services Feb. 2013 submission in the Sunterra board review, which the board generally endorsed in its decision. This policy also combines and replaces the following policy documents: the NRCB's Oct. 22, 2010 *Approval Officer Amendments of Municipal Permits Policy*, and the Sept. 24, 2012 letter from Andy Cumming, Director, Field Services, to NRCB approval officers regarding amendment of existing permit conditions.

2002. Some municipal permits may have been issued before that date, but may have also lapsed (i.e., ceased to be in effect) before then. Thus, when considering whether to amend a municipal permit under this policy, approval officers will first assess whether the permit was still in effect on January 1, 2002. This assessment includes reviewing the permit's terms and conditions and determining all facts relevant to those terms.

For example, a permit issued in 1990 stated that it was void if construction did not commence within two years of the permit's issuance. The permit may well have ceased to exist as a legal matter if the construction did not commence until 1995. In this case, there is no municipal permit to consider amending. (However, if the CFO existed on January 1, 2002 without a municipal permit, it may still be grandfathered under section 18.1 of AOPA.)

In some circumstances, this deadline and automatic voiding was in a provision of the land use bylaw under which the permit was adopted. However, the effect may be the same as if the voiding provision was in the permit itself.

2. Amending municipal permit conditions on an approval officer's own motion

Section 23 of AOPA allows an approval officer to amend a permit on the approval officer's "own motion"—i.e. without an application from the permit holder to amend the permit. While approval officers must provide some notice when amending permits on their own motion, the scope of notice is generally less extensive than when permit holders apply for an amendment. (See Operational Policy 2016-2: *Approval Officer Amendments Under Section 23 of AOPA* for notice procedures.)

Because of the limited notice process, and because approval officer amendments are not made at the permit holder's request, the NRCB's long-standing policy is to use the amendment authority under section 23 only in limited circumstances.

This limited approach is especially warranted in the context of amending grandfathered municipal permits. Many municipal conditions were adopted after contentious municipal hearings or compromises among CFO owners, neighbours and municipalities. In many instances, the CFO owners volunteered these conditions in order to resolve these conflicts. These potential circumstances warrant special caution when amending municipal permit conditions.

Consistent with these principles, approval officers will amend a municipal permit condition on their own motion only if:

- the condition is an operating condition and it is less stringent than, or equivalent to, an applicable AOPA requirement,
- the condition is impractical or impossible to enforce for one or more of the reasons listed in parts 2.2.1 or 2.2.2 below, or
- the condition meets one of the amendment criteria in parts 2.2.3 – 2.2.6, below.

Under the NRCB's approval policy, approval officers may also cancel municipal permits entirely, on their own motion, when consolidating those permits with NRCB-issued permits. In this context, all municipal permit conditions are "carried forward" into the new NRCB permit, except for those conditions that can be deleted under this policy. (See part 2.3, below, for specific procedures for consolidating municipal and NRCB permits.)

2.1 Less stringent or equivalent operating conditions

Several requirements in the Standards and Administration Regulation under AOPA relate to the operation of CFO facilities and to other CFO-related activities, including the

application of livestock manure to agricultural land. The NRCB interprets these "operating requirements" as applying to all grandfathered CFOs, as well as to CFOs permitted by the NRCB after January 1, 2002. The operating requirements in the regulation set a minimum standard of practice, which may be a lower or higher standard than a municipal permit requires. Municipal operating conditions that are less stringent than the operating requirements in the Standards and Administration Regulation are effectively trumped by the regulation. Therefore, these conditions can be removed.

For this same reason, *operating* conditions in municipal permits serve no useful purpose if they are equivalent to corresponding operating requirements under AOPA. Therefore, approval officers may, on their own motion, remove municipal operating conditions that are *equivalent* to AOPA operating requirements. A municipal permit condition may be "equivalent" to an AOPA requirement if:

- its wording is identical or similar to an AOPA requirement
- it requires or prohibits the same conduct as an AOPA requirement
- it provides the same degree of protection from environmental and nuisance risks as an AOPA requirement

Determining the third of these three types of equivalencies can require complex judgments and consideration of the type of protection originally intended by the municipality. For these reasons, approval officers should consider consulting with the municipality before amending a municipal permit condition on the basis of this type of equivalence. (See Operational Policy 2016-2: *Approval Officer Amendments Under Section 23 of AOPA* for notice procedures.)

When removing less stringent or equivalent conditions on their own motion, approval officers will replace these conditions with a general permit term stating that the permit holder must comply with the operating requirements under AOPA.

2.2 Other circumstances when municipal permit conditions may be amended on an approval officer's own motion

Approval officers may amend on their own motion the following six categories of municipal permit conditions. The attached appendix lists examples of actual conditions for each category, to provide additional clarity and guidance.

2.2.1 Conditions that are impractical or impossible to enforce as written

Some municipal permit conditions are impractical or impossible to enforce as written. Examples are conditions that are too vague for anyone to reasonably discern their meaning. Municipal permit conditions that are unenforceable on their face can be removed. (See section 1 of the attached appendix for examples.)

2.2.2 Conditions that are impractical to enforce due to the passage of time

Some municipal permit conditions might have been reasonably enforceable when they were first adopted (or by the dates when the conditions were supposed to be met), but have become impossible or impractical to enforce over time. Considering whether a condition is enforceable as written often raises a number of complex issues and requires a level of fact-finding and discussion among staff. (See appendix, section 2, for examples.)

a. Operating conditions—if an operating condition is impractical to enforce due to the passage of time, an approval officer may remove the condition on their own motion. However, not all unenforceable *construction* conditions can be removed using this process.

b. Construction conditions—many municipal *construction* conditions are difficult to enforce due to the passage of time. Approval officers may remove the parts of municipal construction conditions that require a permit holder to take a certain action by a specified date, or that preclude certain conduct before a specified event. All other parts of municipal construction conditions will be retained. This approach is consistent with the NRCB's long-standing policy of retaining construction conditions in NRCB-issued permits even after construction has been completed and has passed a "post construction" inspection.

   For example, a municipal construction condition may have stated that the permitted construction of a barn was to meet certain specifications, and then stated that the permit holder could not allow livestock in the barn until the barn was inspected by a government official. If the barn was populated after being constructed, the inspection requirement is likely no longer enforceable due to the passage of time. The approval officer may therefore remove that requirement. However, the approval officer should not remove the remainder of the condition. (See part 2.c of this policy, below, for procedures for carrying forward construction conditions in municipal permits, when consolidating those permits with a new NRCB permit.)

2.2.3 Conditions that require or allow for cancelling or voiding the permit

Some municipal permits include specific terms or conditions that state that the permits are (automatically) null and void if construction deadlines or other conditions are not met. Other municipal permits gave the municipality discretion to cancel permits if certain conditions were not met.

NRCB-issued permits do not use this type of condition. The NRCB's enforcement approach is flexible and reflects a more cooperative and education-oriented enforcement philosophy. It seeks compliance while retaining the NRCB's ability to issue enforcement orders and seek judicial penalties for serious noncompliance.

Because the strict enforcement approach reflected in these municipal permit conditions is wholly inconsistent with that used by the NRCB, these conditions are unnecessary and may be removed by approval officers on their own motion, *provided the permit was still in effect on January 1, 2002*. (See appendix, section 3, for examples.)

2.2.4 Conditions related to dead animal disposal

NRCB-issued permits generally do not include conditions relating to dead animal disposal because this activity is regulated directly by Alberta Agriculture and Forestry's Regulatory Services Branch, under the *Animal Health Act*. (See Operational Policy 2016-7: *Approvals*.) Given Alberta Agriculture and Forestry's regulatory role, concurrent oversight of dead animal disposal by the

NRCB would be inefficient and might lead to inconsistency with Alberta Agriculture and Forestry requirements.

However, some deemed municipal permits (and a limited number of NRCB-issued permits) include conditions relating to the disposal of dead animals. In many cases, the municipal conditions were adopted as part of a package of requirements that were meant to allay substantial community concerns about a CFO's overall nuisance impacts.

For this reason, approval officers will not, on their own motion, delete or amend a municipal permit condition relating to dead animal disposal that is *more stringent* than the *Animal Health Act*. Permit holders may still apply to the NRCB to delete or amend any such condition, and approval officers will consider those applications, consistent with part 3 of this policy. (This approach is consistent with the provisions of the 2014 addendum to the June 2013 memorandum of understanding between the NRCB and Alberta Agriculture and Forestry.)

On the other hand, approval officers may, on their own motion, delete or amend municipal permit conditions that require the permit holder to either:

- comply with the dead animal disposal requirements enforced by Alberta Agriculture and Forestry, or
- adopt dead animal disposal practices that are *less stringent* than those required by Alberta Agriculture and Forestry.

These two types of conditions serve no effective purpose, given Alberta Agriculture and Forestry's own regulatory program.

2.2.5 Conditions related to water licences

Municipal permit conditions that relate to water licences issued by Alberta Environment and Parks under the *Water Act* can be removed.

When justifying removal of these conditions, decision summaries can state the following:

*"Condition [#] of Municipal Development Permit [#] relates to water usage **[or provide more specific description],** which is regulated directly by Alberta Environment and Parks under the Water Act. Given Alberta Environment and Park's direct oversight of water usage **[or more specific description]**, condition [#] of Permit [#] will be removed from the amended permit.*"

2.2.6 Conditions unrelated to managing livestock manure and minimizing its impact

Some municipal permits contain conditions that seem unrelated to AOPA's general or primary mission of managing livestock manure. Approval officers may remove these conditions on their own motion, if neither the municipality nor the permit holder objects to removing these conditions.

2.3 Consolidating municipal permits with NRCB-issued permits

Under the NRCB's approval policy, approval officers will consolidate all of a CFO's existing permits—including its municipal permits—when issuing a new approval or registration for the CFO. As explained in the approval policy, consolidating permits

means carrying forward the terms and conditions of all of the existing permits into the new permit and then cancelling the existing permits. Approval officers typically carry out this consolidation on their own motion, even though the new permit is being issued in response to an application from the CFO owner.

When consolidating a municipal permit with a new NRCB permit, the approval officer will note in the decision summary that the municipal permit terms and conditions that are being carried forward are meant to have the same meaning and intent as they had when included in the original municipal permit.

To further ensure these carried forward provisions have a consistent meaning, they will be copied ***word for word*** when they are carried forward, unless the approval officer believes there is a good reason to change the wording, in which case the decision summary will acknowledge and explain the change.

In other words, any changes to the wording of municipal permit conditions will be noted and explained in decision summaries*.*

The new NRCB permit will clearly identify which of its terms and conditions were carried forward.

The following statement will be added to the new NRCB permit:

"Municipal Development permit # __ is cancelled and is no longer in effect, unless the ***[new Approval/Registration/Authorization]*** *is held invalid, in which case Municipal Development permit # __ remains in effect. Issuance of this amended permit in no way affects the grandfathered status of this operation."*

When consolidating municipal permits with other AOPA permits, approval officers will carry forward municipal construction conditions to an appendix of the new permit.

For construction conditions that are determined not to require any further follow up, approval officers will indicate the following in the database:

"This confined feeding operation is grandfathered under AOPA and, as such, construction conditions in the operation's deemed permit may or may not have been met and are likely unenforceable due to the passage of time."

3. Amending municipal permit conditions on application by the permit holder

This part provides guidelines for approval officers when they are considering applications to amend municipal permit conditions.

In this context, approval officers can amend municipal permit conditions under any of the general circumstances listed in parts 2.2.1 – 2.2.6, above, for amending conditions on an approval officer's own motion.

When amending these types of conditions on an application, approval officers should consider input from municipalities and any other directly affected parties that are notified of the CFO owner's amendment application.

The rest of this part addresses the amendment of municipal permit conditions that are not among those listed in parts 2.2.1 – 2.2.6 above.

3.1 Construction conditions

Municipal construction conditions should be retained or carried forward to new NRCB permits, except those construction conditions noted in part 2.2, above.

3.2 Operating conditions that are more stringent than comparable AOPA requirements

When amending municipal permit operating conditions that are more stringent than comparable AOPA requirements, approval officers must consider the burden of proof, as well as the factors set out in parts 3.2.2 and 3.2.3, below.

3.2.1 The burden of proof

As the NRCB's board members made clear in their 2013 Sunterra decision, AOPA generally places the overall onus or burden on CFO owners to demonstrate that they are entitled to an amendment of an AOPA permit.[3] That said, the burden of proof principle should be carefully and pragmatically applied to avoid unintended consequences. For example, a CFO owner may not need to actually provide any evidence if a condition on its face warrants removal or other change. Likewise, a CFO owner should not be expected to prove facts that are known only to another party. In particular, if a CFO owner is unable (after reasonable efforts) to obtain records to show a municipality's intent in adopting a condition, and the intent is not reasonably apparent from the face of the condition, then the burden is on the municipality to provide sufficient rationale to support retaining the condition.

In addition, if the municipality or another directly affected party asserts a fact in opposition to the CFO owner's application, that party generally has the burden of proving their assertion.

In short, while the burden of proof is an important principle, it is not meant to make CFO owners jump through hoops just for the sake of having to jump through hoops.

3.2.2 Other key principles inferred from AOPA's grandfathering provisions

Section 18.1(4) of AOPA states that, when a CFO is grandfathered based on its receipt of a municipal permit before January 1, 2002, the "terms and conditions" of the CFO's municipal permit are automatically part of the CFO's "deemed" permit. Under that section of the act, these municipal terms and conditions "continue to apply despite the regulations," except when the deemed permit is "amended in accordance with this Act" (or when the permit is trumped by an enforcement order).

The NRCB interprets these provisions as intending to preclude approval officers from deleting more stringent municipal operating conditions for the sole reason that they are more stringent than AOPA. If the legislature had intended this outcome, then it would have simply stated that, when municipal permits are grandfathered, their operating conditions are automatically replaced by AOPA's operating requirements.

3. *Sunterra Farms Ltd.*, NRCB Board Decision 2013-02/RA09046A (Apr. 12, 2013), p. 6.

For the same reason, approval officers should not remove more stringent municipal operating conditions based solely on the *general* logic that it is "unfair" for grandfathered operations to have to comply with more stringent requirements than AOPA.

Consistent with this interpretation, an approval officer may remove more stringent municipal operating conditions only when a CFO owner has provided adequate justification for doing so. (As noted above, an approval officer may also remove or modify more stringent municipal operating conditions that are problematic as written.)

In addition, and as noted in part 2 above, many municipal conditions were adopted after municipal hearings or were based on compromises reached with CFO owners, neighbours, and municipalities. In many instances, the CFO owners volunteered these conditions in order to resolve concerns. Because a given municipal condition may have arisen this way, approval officers should use special caution, and give serious consideration to input from directly affected parties, when considering whether to amend or remove a municipal condition.

3.2.3 Factors to consider when reviewing applications to amend municipal operating conditions that are more stringent than AOPA

As noted in part 3.2.2, above, approval officers should consider whether a condition that is more stringent than AOPA can justifiably be removed, based on the reasons provided by the applicant, and in light of the reasons the municipality adopted the condition in the first place.

In addition, the applicant's justification must be considered in light of the current AOPA requirement and all other relevant factors. The following is a list of generally relevant factors. This list is drawn in part from the board's decision in *Sunterra*.

a. Input from municipalities and other directly affected parties

   Perhaps the most obvious or compelling circumstance warranting removal of a municipal condition is when the municipality and any other directly affected parties all support removing the condition, or at least do not object to removing it. In this instance, removing the municipal permit condition would be consistent with AOPA's provisions for the role of municipalities as directly affected parties in the NRCB's regulation of CFOs. In addition, removing the condition would not offend any compromises that may have been reached in the municipal permit proceedings and that may have given rise to the condition.

b. The municipality's original reason or technical basis for adopting the condition

   A municipal condition may be removed when the municipality's original reason no longer applies due to changed circumstances. Examples include:

   - A municipal condition required a cover on an outdoor liquid manure storage lagoon, in order to minimize the effect of its odour on a then-existing golf course in the area. However, if the

area's lands have since been re-zoned industrial and the golf course has been converted to an industrial site, the reason for the condition has disappeared. In this case, there may be ample justification for removing the condition.

- The historical record shows that a CFO owner committed to a municipally-imposed manure spreading setback as a compromise to protect a concerned neighbour. The neighbour has moved away and the CFO owner now owns the neighbour's land and all other surrounding land. Because the original reason for the condition has disappeared, there may be ample justification to remove the condition.

Other circumstances that may warrant amending a more stringent municipal operating condition include: the municipality cannot identify a technical basis or provide other substantive justification for the condition, or, the technical basis for adopting the condition is no longer valid. Examples include:

- The historical record shows that a municipality based a condition on a then-existing scientific study, which is now outdated by more recent scientific research. The current science may provide sufficient justification to modify the condition, or to delete it altogether.
- The municipality's reason for adopting a condition was simply to ensure a CFO used, or met a level of protection set by, the best practices in the Alberta livestock industry. This type of condition referred to the prevailing code of practice as a benchmark of the industry's best practices. Those practices may have changed over time and may now be reflected in AOPA requirements. Thus, the municipality's objectives can continue to be upheld if the approval officer deletes the municipal conditions that were based on best practices at that time, and replaces those conditions with current AOPA requirements.

Finally, in some circumstances, the municipality may not be able to identify its original purpose for adopting the condition and its reason why the condition's specific terms were chosen to serve that purpose. If the condition's purpose and rationale are not apparent on the face of the condition, the municipality's failure to identify the original purpose and rationale may be sufficient justification to delete the condition.

c. The means chosen by the municipality to achieve the condition's purpose

It may be appropriate to delete a more stringent municipal operating condition if the condition's requirement is not reasonably necessary to achieve the municipality's reasons for adopting it. Examples include the following:

- A municipality adopted a one kilometre manure application setback from a specific surface water area. However, at one location the ground surface slopes *away* from a lake, starting at a distance of half a kilometre from the lake. In this example, it

may be appropriate to reduce the setback to half a kilometre from the specific lake, because for all practical purposes a half kilometre setback provides as much protection to the lake from surface runoff as a one kilometre setback.

- A municipality adopted a condition requiring a CFO owner to use a specific technology to confine and retain odours. If the owner can reasonably show that an alternative technology can achieve the same level of odour control as the technology required by the condition, but at far less cost, the approval officer might reasonably modify the condition to allow the alternative technology.

As shown by both of these examples, the justification for this type of circumstance will likely need to be site- or fact-specific, in contrast with generic, bare-bones claims that AOPA requirements are "adequate."

d. Other factors

Approval officers should consider the following additional factors when deciding whether to grant an application to remove or amend a more stringent municipal operating condition:

- the process that led to the municipality's adoption of the condition (e.g., whether the CFO owner offered the condition; whether the condition was imposed following an appeal)
- the practical effect on and cost to the applicant from having to comply with the municipal condition
- the ongoing benefits of the condition to neighbours or the public more generally
- actions undertaken by other parties in reliance on the condition
- changes in circumstances since the condition was adopted (other than the adoption of AOPA, per se), and
- any other considerations that are special or unique to the CFO or community

3.3 The full scope of the grandfathered operation

In many instances, a CFO had a larger capacity on January 1, 2002 than specified in the CFO's municipal permit. In some cases its facilities on that date were different than required by their municipal permit. If the NRCB has determined that the CFO is grandfathered according to the operation's actual capacity as of January 1, 2002, those characteristics would define the parameters of the CFO's "deemed" permit under AOPA. In other words, those characteristics would trump the terms or conditions of the CFO's municipal permit.

In this case, rather than amend the municipal permit to reflect the parameters of the CFO's deemed permit, the approval officer will state that the CFO has a deemed permit, "including municipal permit #__." The approval officer will then clarify what, if any, terms (and conditions) of the CFO's overall deemed permit are different than those stated in the CFO's municipal permit.

APPENDIX: Examples of municipal permit conditions that approval officers can amend on their own motion

1. Conditions that are impractical or impossible to enforce as written

- Proper methods to be applied to minimize odour whether it is chemical or the latest technology. *("Proper methods" not clearly defined and a constantly moving target)*
- Odour control measures should be implemented in the manure storage lagoon to reduce the nuisance of the intensive livestock odors. *(Non-specific about odour control measures)*
- Catch basins are to be non-permeable. *(All materials have some permeability)*
- The odour shall not exceed the level of 1994. If control is not satisfactory, further odour control shall be rectified. *(Impossible to determine what the odour level was in 1994 and there are no reliable tools to measure odour)*

2. Conditions that may have become impossible to enforce through the passage of time

- The applicant is required to obtain a Certificate of Compliance as issued by Alberta Agriculture. *(These are no longer issued)*
- No building expansion or intensification of use of the site beyond that which has been authorized by this permit shall be undertaken without the prior approval of the Development Officer or the Municipal Planning Commission. *(AOPA requires operators to obtain a permit from the NRCB for any expansion or construction of manure storage or collection facilities)*
- No later than one year after commencing operating, the operator shall request inspection from Alberta Agriculture, Food and Rural Development and Alberta Environmental Protection in regards to the entire operation, including storage of manure, disposal of manure and the method of disposal of animal carcasses. *(Passage of time)*
- The developer shall reimburse the Municipality for all legal, engineering and other professional costs incurred by the Municipality after the date of this decision in respect to the compliance with or enforcement of any of the conditions attached to this Notice of Decision. *(Passage of time)*
- New road approach to be located and built to the satisfaction of County's Public Works Department. Please call Department at 782-6601 to arrange site inspection prior to construction. *(Passage of time. Construction completed)*

3. Conditions that call for automatic cancellation or voiding of permit

- The MD may be conducting periodic site inspections and if any deviation of the above conditions are found it may result in a cancellation or suspension of the Development Permit. *(Inconsistent with the NRCB's compliance approach)*
- Failure to conform to any of the aforementioned conditions may render this permit null and void. *(Inconsistent with the NRCB's compliance approach)*

Contact the Natural Resources Conservation Board at the following offices. Dial 310.0000 to be connected toll free.

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T 780-939-1212 F 780-939-3194

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303, 4920 - 51 Street
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T 403-340-5241 F 403-340-5599

NRCB Response Line: 1.866.383.6722
Email: info@nrcb.ca
Web address: www.nrcb.ca

Copies of the *Agricultural Operation Practices Act* can be obtained from the Queen's Printer at www.qp.gov.ab.ca or through the NRCB website.