



March 20, 2023

Attention:

In regards to potential concerns for **Application #001-486548 By Creekstone Farms Ltd.**

It is important for our neighbors to understand that we earn our living from agriculture and due to the many outside forces that exist today, we must expand and continue to build value added agricultural businesses on or near our feedlot. The Federal Government in particular, is wanting all agricultural ventures to be more environmentally friendly and sustainable, hence the need to recycle our critical water supplies.

With the large monopoly in the processing industry, controlled by two foreign owned corporations, one of the few solutions for the beef industry is to add more processing capacity. Currently the feedlots are losing \$300/head while the packers and retailers are making a substantial profit. The cow/calf producer has also been hurt on the bottom line with the inability to get higher prices due to lack of competition in the packing industry.

Our county is currently home to approximately 150,167 (2016) cows and calves. This is the 7th largest cow population by County in the Province. Our numbers have declined significantly since 2003 due to the Bovine spongiform encephalopathy (BSE) scare, drought and lack of profitability.

We would appreciate our neighbors support for this facility as it would ultimately promote our county's ranchers and cow/calf producers, who as we do, take pride in producing quality beef. Any adverse effects to property values or quality of life will be minimal if any. We have moved the proposed plant site north of Highway 564 specifically to protect our Ardenode neighbors from any traffic concerns. It has also been pointed out that abattoirs are regularly located in urban centers with limited impact to neighbors. So, our current site should have a limited impact on our neighbors.

We have worked diligently with our engineers to make sure our neighbors are minimally impacted by this project. Your concerns are addressed as follows:

CAPACITY AND SCALE

The plant is designed for a building and systems to process 100 head per day. This is a very modest size for operations of this type. Many people base their concerns on the size of operation at Brooks, which currently processes 4,000-4,500 head per day. The potential impacts including odours and waste disposal requirements are not comparable. Also, as the proposed plant is across the road from a 25,000 head feedlot, there is already some odour on any given day. The abattoir is a very small size even compared to the existing feedlot.

AIR QUALITY

Odor from plant operations -

All abattoir operations are fully contained within the building. All heating and ventilation equipment, and all water heating equipment is being selected to comply with current standards and requirements for maximum efficiency and minimal emissions. Off odours from meat and/or food processing are the result of unsanitary conditions in which residual organic matter is decaying in place. This will not be a problem for two reasons:

1. All marketable products are stored in refrigeration coolers and all waste products are removed on a daily basis and transported off-site for processing and/or disposal.
2. The abattoir will be a federally regulated facility with Canadian Food Inspection Agency (CFIA) personnel present at all times to ensure the building sanitation and meat handling practices create safe food for human consumption.

Wastewater storage pond –

The wastewater storage is not a treatment lagoon it is simply a liquid storage. It is not discharged to the environment but rather the wastewater is recycled on crop land to utilize the moisture and any residual organic matter. The storage will be covered to inhibit odour and emissions. The cover will be inspected monthly for punctures, tears, and any other damage that might result in leakage and repaired promptly. With no wind effects agitating the wastewater in storage and with no direct contact between wastewater and the atmosphere, odour production and release will be minimized.

Odor from wastewater irrigation spray –

Creekstone Farms typically applies a total of 13 inches of irrigation water each year to the land base designated to receive wastewater. Wastewater from the storage pond will be injected into the pipeline supplying the normal application of irrigation water. Wastewater will constitute less than 5% of the total annual application to the land base. At any point in time, the water being applied will be 90% or more fresh water with the balance made up of a small proportion of wastewater. The reclaimed water will be tested prior to application through irrigation. The use of this water is subject to provincial environmental regulations.

Emissions and air pollution –

All vehicles accessing the abattoir site are subject to Canadian federal government emission regulations¹. The proposed plant site is located one half kilometer north of secondary Highway 564 on range road 253 which is a designated truck route. Both roads are very busy and we have no control over their use. The abattoir will reduce the need for the transport of live cattle off of the feedlot site.

NOISE POLLUTION

There will be more traffic but some of that traffic will be from the feedlot across RR 253 and will not be on highway 564. Trees will be planted and berms built to mitigate some of the noise. Forty people work at Cattleland Feedyards daily and many commercial trucks come and go, delivering grains and cattle. So separating the processing facility noise from other traffic will be difficult. The cattle will be unloaded in a barn, similar to Cattleland Feedyards, with the utmost attention to keep them as comfortable as possible. There are constant animal noises from the feedlot as well, so again it would be difficult to differentiate where any noise is coming from.

WATER CONTAMINATION

Wastewater storage pond leak and leach into water table –

To ensure that there is no leakage from the wastewater storage pond to contaminate groundwater sources, a geotechnical study of the site was completed to assess the nature of the soils and develop appropriate construction guidelines and recommendations. The geotechnical engineer recommended a High-Density Polyethylene (HDPE) liner with a 40 mil thickness, to ensure the integrity of the liner over time. We have chosen to install a liner of 60 mil thickness to further reduce risk and concern. Prior to installing the liner, due care will be taken in the bed preparation to ensure there are no hazards (e.g. sharp rocks) present to cause tears or ruptures. The liner will be installed with an under drain that will detect any punctures, tears, or other damage that may compromise its integrity. If at any time a leak is detected, it will be repaired. Monitoring wells will also be installed and sampled to further ensure that there is no leakage occurring from the wastewater storage pond.

Chemical contamination of water sources –

All chemicals used for sanitation and other purposes within the abattoir must meet the CFIA requirements for a meat and food processing facility. These products pose minimal risk to the natural environment since they are safe to use in a food processing facility and around edible human food products. Finally, there should be no concern with heavy metal contamination from a food processing facility since such products are strictly precluded for use in food handling and production.

¹ Government of Canada (2003). On-Road Vehicle and Engine Emissions Regulations (SOR/2003-2). Retrieved on August 16, 2022 from: <https://laws-lois.justice.gc.ca/eng/regulations/sor-2003-2/index.html>.

WATER ALLOCATION AND SUPPLY

Process water allocation and treatment –

To provide processing water for the abattoir, Creekstone Farms has three water agreements with Western Irrigation District (WID). Two of these are rural water use agreements for the abattoir, totaling 50,000 cubic meters per year. The third agreement is an irrigation agreement totaling 915,860 cubic meters combined. The irrigation license is strictly for irrigating crops on 495 acres of land while the rural water use agreement allows Creekstone to treat and use the water for the abattoir. Hence, there should never be a need for special allocations from WID to meet the needs of the abattoir nor any need for tapping into groundwater resources via wells.

Since the Creekstone Farms abattoir is to be a federally regulated facility with direct supervision from the Canadian Food Inspection Agency this agency will be ensuring that all water supplied into the buildings is to be treated to an acceptable standard for meat processing. CFIA will institute appropriate processes and quality checks that will be implemented to ensure the water used in the plant for meat processing purposes meets safety standards.

Water supply for drinking and domestic use –

For domestic uses within the abattoir including staff restrooms and dining facilities, a local bulk potable water supplier will be contracted to fill an on-site cistern as required for these purposes. Staff will be provided bottled drinking water for their personal consumption.

PATHOGENS, PESTS AND WASTES

Pathogens, specified risk materials (SRM'S) –

The facility is producing food for human consumption. The abattoir is to be a federally regulated meat processing facility subject to the sanitation standards with all operations carried under the inspection and oversight of the CFIA. These standards and oversight ensure that pathogens including bacteria and viruses within the abattoir are controlled to ensure food safety and quality. With this level of sanitation and control within the facility it is highly improbable that emissions from the facility present much risk outside the facility.

The building is also designed such that all wash and wastewater within the building from sinks, floor drains, and processing equipment is filtered and passed through a grease interceptor prior to being discharged into the covered wastewater storage. The filter and all operations within the abattoir are designed to be compliant with the CFIA's guidance on handling of SRMs². The filter is specifically designed with a screen with a mesh size of no more than 4 mm diameter to meet these guidelines. Both the filter and the grease interceptor will be cleaned and inspected on a daily basis in compliance with recommended sanitation practices. All filtered material and

² Government of Canada (n.d.). Guidance on Specified Risk Material. Retrieved on August 18, 2022 from: <https://inspection.canada.ca/food-guidance-by-commodity/meat-products-and-food-animals/srm/eng/1369768468665/1369768518427>.

grease trappings will be kept within the building in the waste and by-products loadout area until transportation off-site for processing and disposal daily.

The overall effect of complying with CFIA requirements on plant sanitation and materials handling is to ensure that the risk to public health and well-being from the operation of the abattoir will be minimal.

Pests, Vermin, and Scavengers –

The abattoir is to be a federally licensed food processing facility subject to the standards and regulations of the Canadian Food Inspection Agency (CFIA). This includes strict controls and limitations on the presence of pests, vermin, etc. to ensure food safety and quality. CFIA will have staff on site at all times during operation and will oversee pest control measures.

Waste and Waste Disposal –

We currently use Alberta Processing (Westcoast Reduction Ltd) to pick up all our mortalities at the feedlot. They come to the feedlot five days per week. They also will be contracted to pick up all the waste from the plant daily, mitigating the potential for odour and pests. Since they currently come to the feedlot daily, this will not increase the traffic significantly in the area.

The plant will be a CFIA regulated facility. CFIA will monitor all waste disposal and requires a qualified company such as Alberta Processing to handle all the products.

COMMUNITY IMPACTS

Multi-factor concerns –

The closest community with a population identified by Statistics Canada is Nightingale (pop. 32, 2016 Census). The Hamlet of Ardenode is in fact closer at a distance of only 1.2 km south of the proposed site but was identified as having a population of precisely 0 in the 2016 Census, is not identified as a distinct community in the 2021 census.

The proposed abattoir is being planned for land that is zoned Agriculture General by Wheatland County which provides for discretionary use where activities support the goals and objectives of the Municipal Development Plan and preserve the agrarian character of the county.

The location of the abattoir is ideal for its proximity to a labour pool, being Strathmore, Chestermere and Calgary as well as for its practicality in being supplied cattle from our feedlot operation.

We received a concern to the effect of: *“I have heard of this applicant neglecting the routine maintenance of their feedlot operations in the past and they purportedly allowed the accumulation of manure within their animal pens to the point where the cattle contained within could not reach their water supply. The proposed lagoon, however primitive in operation will*

require from the applicant a level of technical knowledge and community responsibility they do not possess and will not care to acquire.”

This situation is difficult to fathom as the cattle are checked twice per day for health and welfare. Waterers do break down but are fixed immediately as water is critical to their well-being. We have had no NRCB enforcements since we have been operating the feedlot. We took over the operations in 2013 and have worked very hard on a daily basis, to run the feedlot as efficiently and effectively as possible. We have a very conscientious staff, who aim to provide the highest quality of care in the industry. We have veterinarians and nutritionists that attend the feedlot regularly to advise us along the way. Constant work is being done on pens, the mill, roads, etc. to make the feeding and the care of the animals' top priority. We have purchased a water truck so when we are hauling manure or silage to and from our fields, we can water the neighbor's roads to eliminate as much dust as possible. Our drivers drive the speed limit at all times. Any complaints, we act on them immediately.

Community relations –

As far as relations with our neighbors and community, we feel it is important to support the community whenever possible and we donate to many organizations annually. Some of those organizations are as follows:

- The many 4 H clubs in the area
- Lions clubs in the area (Cheadle and Beiseker)
- Nightingale community center
- Sponsor hockey and ringette teams annually
- Project Hope
- Wheatland Crisis Society
- Fun Country Riding Club
- Strathmore Musical Arts Society
- Wheatland Conservation and Wildlife organization
- Sponsorship for Strathmore High School Rodeo and District Agricultural Society
- Hussar curling club
- Strathmore Overnight Shelter
- Wheatland Hospice Society
- Many more miscellaneous local organizations

For some of our senior neighbors that may get snowed in, we always take the time to plow them out or if a neighbor slips into the ditch, we always stop by to help. Because we have a water truck, we do not hesitate to help if there is a fire in a field close by or water the roads during silage or manure haul.

Impacts on the local economy –

Some other facts about Cattleland Feedyards that the public may not be aware of is that on average we spend the following in our community each year:

- Purchase of grain and other feedstock from our neighbors and local area \$15 – 22 million
- Purchase of cattle approximately \$15 million
- Purchase of other supplies and services from our local and area suppliers including repair services, parts, insurance, fuel, drug expenses for cattle, etc. \$3 million.

At all times, we look to support the local businesses first before we go elsewhere.

MANAGEMENT CAPACITY AND ABILITY

We received comments regarding our capabilities or willingness to operate such a facility, or which are questioning our personal abilities as owners. As we don't know most of the people who have expressed these concerns, we would like to provide the following:

The owner of the business is Joe Gregory, a veterinarian who operated a successful practice in Strathmore for many years before retiring. He is well aware of how stringent legislative bodies can be and the paperwork required.

The Chief Financial Officer (CFO) is Karen Gregory, a Chartered Professional Accountant (CPA, CA). Karen has owned a successful accounting practice in Strathmore for many years before retiring.

Both Joe and Karen have organized and completed other projects successfully including land development, and are familiar with the need to acquire multiple approvals from government bodies.

Keith Gregory is the operations manager of the feedlot operation, and has an Earth Science degree and an MBA. He monitors the operation's wells monthly as well as dealing with NRCB and Alberta Environment.

Tom Gregory CPA,CA is the youngest family member and the financial and accounting manager of the feedlot operation and has a degree in geophysics.

We feel we are more than capable of dealing with the rigors of running a successful business. We also will be hiring fully qualified staff to help us run the abattoir.

We value our neighbors and understand their desire to maintain their current lifestyle. We honestly believe that this project will have minimal impact on their lifestyles while making a substantial difference to the agriculture industry in Wheatland County. We have received a great deal of support from our local ranchers and numerous government officials as they recognize a need for more processing facilities.

Respectfully yours,

Keith Gregory,

Vice President

Creekstone Farms Ltd.