



www.nrcb.ca

DISTINGUISHING BETWEEN CONFINED FEEDING OPERATIONS AND SEASONAL FEEDING AND BEDDING SITES (FOR CATTLE OPERATIONS)

Operational Policy 2015-2

Agricultural Operation Practices Act
June 11, 2015

Revised July 5, 2018

TABLE OF CONTENTS

- 1. Introduction 1
 - 1.1 Uses of the policy 1
 - 1.2 Decision options 2
 - 1.3 Facilities used for short term handling and non-commercial purposes 2
- 2. Background 2
 - 2.1 Livestock “over-wintering” 2
 - 2.2 The factor-based approach in the 2004 guide 3
 - 2.3 The hybrid decision tree and factor-based approach in the 2015 guide 4
- 3. Overview of the 2018 guide 4
- 4. The three criteria in the decision tree part of the 2018 guide 5
 - 4.1 A facility used for confined feeding between July 1 and September 15 is a CFO facility 5
 - 4.2 A facility used solely to confine and feed a component of a cow-calf operation is an SFBS (unless feeding occurs during the grazing period) 5
 - 4.3 When the facility is adjacent to a CFO 6
 - 4.3.1 The characteristics of an “adjacent SFBS” (Table 1) 7
 - 4.3.2 When a facility is considered “adjacent to a CFO” 7
- 5. The multi-factor table in the guide (Table 2) 7
 - 5.1 New factor: maximum number of animals being confined 8
 - 5.2 Excluded factor: runoff risks 8
- 6. Documenting the CFO/SFBS determination, and peer review 9
 - Guide for Distinguishing Between a Confined Feeding Operation (CFO) Facility and a Seasonal Feeding and Bedding Site (SFBS) 10
 - Table 1. Factors for assessing facilities adjacent to a CFO 11
 - Table 2. Factors for CFO/SFBS determinations 12

1. Introduction

The *Agricultural Operation Practices Act* (AOPA) requires permits for the construction and operation of “confined feeding operations” (CFOs) whose livestock numbers are over prescribed thresholds. The act’s definition of CFOs excludes “seasonal feeding and bedding sites” (SFBSs). The act defines a seasonal feeding and bedding site, but the definition is ambiguous and challenging to apply in many cases, especially for many cattle operations.

From 2004 to 2015, the NRCB used a “balance of factors” approach to distinguish an SFBS from a CFO. This approach provided flexibility to account for site-specific circumstances. However, this flexibility gave rise to concerns about consistency and clarity.

In 2015, the NRCB adopted a new policy to provide a transparent and more consistent method for NRCB Field Services staff to use when determining whether a cattle facility is a CFO or an SFBS. The core of the 2015 policy was a decision making guide. The guide’s first part was a decision tree (with two decision levels) and the second part was a table of nine factors. Use of the decision tree could lead to a final CFO or SFBS determination without needing to consider the factor table. However, in certain circumstances, the decision tree required applying the factor table in order to make a final determination.¹

The 2015 guide was the culmination of several years of discussions among the NRCB, Alberta Agriculture and Forestry, and interested stakeholders. However, even when it adopted the 2015 policy, the NRCB recognized that the policy would likely need additional refinement after it was ground-truthed and following further research, analysis, and discussion.

The new guide attached to this policy is based on this additional effort since 2015. As with the previous guide, the new guide consists of two main parts—a decision tree and a factor table. However, the new guide aims to provide even more clarity, transparency, and consistency by adding one more level to the decision tree and a table of factors for assessing facilities adjacent to a permitted CFO. These additions should reduce the number of determinations that will be required using the factor table at the end of the guide.

Section 2 of this policy provides background on the legislative basis for the guide and how the guide has evolved from the factor-based approach. Section 3 provides an overview of the guide, and sections 4 and 5 provide additional detail. Section 6 addresses staff documentation of their CFO/SFBS determinations using this guide.

1.1 Uses of the policy

This policy is *only for facilities that confine cattle*, which are by far the most common type of SFBS livestock facility. To date, the NRCB has developed a separate policy for making CFO/SFBS determinations for meat goat operations. (See NRCB Operational Policy 2016-9: *Meat Goat CFO Determinations*.) 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.

Where applicable, this policy can be used for classifying current facilities, deciding the acceptable parameters for future uses of a facility, determining whether a facility “existed as a CFO” facility on January 1, 2002, or for other grandfathering purposes.

1. In 2016, the NRCB made minor, non-substantive revisions to the narrative part of the 2015 policy, but did not change the two-part guide. For brevity, the previous policy is referred to as the “2015 policy.” The guide attached to that policy is the “2015 guide.”

This policy includes non-discretionary and discretionary aspects. However, as with any NRCB policy, Field Services staff have discretion to modify the policy when strictly applying it would be manifestly unfair, or in other necessary and appropriate circumstances.

1.2 Decision options

This policy does not preclude Field Services staff from concluding that a given facility is neither a CFO facility nor an SFBS. For example, a pasture used solely for summer grazing is neither a CFO nor an SFBS, because cattle aren't being fed in the pasture. (As used in this guide, the term "fed" means providing any type of feed system other than grazing.)

1.3 Facilities used for short term handling and non-commercial purposes

The attached guide does not apply to the confinement and feeding of cattle in a facility used solely for short term handling—sorting, processing, treating, shipping, quarantining, or receiving. The NRCB does not view these - as CFO facilities. Nor does their presence indicate that the overall operation is a CFO, because many or most pure grazing operations include one or more short term handling facilities. (Accordingly, the NRCB does not consider short term handling facilities when determining a grandfathered CFO's deemed capacity.)

Similarly, the NRCB does not consider confining cattle in a facility for an operator's domestic or personal, non-commercial purposes to be a CFO-type use of the facility, regardless of when the confinement occurs. Examples of this usage include raising their own 4H cattle and feeding cattle for personal consumption. (However, facilities used for personal, non-commercial purposes may need to be permitted under AOPA if they are part of an above-threshold CFO.)

2. Background

Section 1(b.6) of AOPA 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..." That definition exempts several types of facilities from the CFO definition, including "seasonal feeding and bedding sites" (SFBSs). Section 1(i) of AOPA defines an SFBS as an "over-wintering" site where livestock are "fed and sheltered." The act does not define "over-wintering" or "fed and sheltered." The NRCB therefore needed to interpret these terms and provide policy guidance for distinguishing between a CFO facility and an SFBS.

2.1 Livestock "over-wintering"

The term "over-wintering" is commonly used in the livestock industry. The NRCB interprets the term based on this usage, and by reading it in light of AOPA's purposes. From these standpoints, the NRCB views "over-wintering" to generally refer to a limited period during which livestock cannot subsist solely or even partially on grazing. This inability to graze is due to either a lack of new grass, or other climate-related reasons (for example, extremely low temperatures or deep snow). During this period the operator **would be** grazing the livestock if grass were available.

The "would be grazing" element of this SFBS definition excludes the winter-time confinement and feeding of finishers in a feedlot. This is because the finishers would not be grazing even if grass were available.²

2. In this policy, "finishers" refer to beef cattle that weigh at least 900 lbs. (This is the same definition as that used for "finishers" in Schedule 1 of the Part 2 Matters Regulation under AOPA.)

This concept of “over-wintering” may seem straight forward, but it can be difficult to apply to a site for several reasons. One is that climatic conditions (and accordingly the feasibility of grazing) vary throughout Alberta and can also vary on an annual basis in any given region of the province. Another reason is that there may be differing views on when a pasture or broader region can be grazed. These differences arise from varying management objectives for the livestock, and varying land managers’ objectives for the condition or health of the grass and broader ecosystem. In addition, the feasibility of grazing at a particular time of year may vary from operator to operator, depending on each operator’s ownership of or access to graze-able pastures.

In the NRCB’s view, the “classic” or clearly recognizable SFBS is a pasture or land that is cropped annually. (This policy uses the term “pasture” to mean a site that is generally grazable and is used for grazing.) At this “classic” SFBS, subsistence feed is brought to livestock at a time when grazing cannot be continued as the sole or primary feed source, due to climatic conditions. The classic SFBS may also include a natural shelter belt or an artificial structure to shelter livestock from extreme elements.³

This is just the classic SFBS. In reality, operators use a wide variety of facilities to confine livestock. Some of them may be an SFBS and some may be a CFO, so each one must be assessed on its own merits.⁴

In addition, individual facilities may be used differently from year to year depending on markets and other non-climate-related factors, so this variance may also need to be considered.

2.2 The factor-based approach in the 2004 guide

Because “over-wintering” is ambiguous, the NRCB previously distinguished a CFO from an SFBS by considering the totality or balance of several factors. The NRCB viewed these factors in light of AOPA’s objectives and the permit-based regulatory approach in AOPA.

In the NRCB’s view, AOPA’s objectives include

- minimizing the environmental risks and nuisances that are posed by large, dense concentrations of livestock and manure, and
- providing affected municipalities and citizens with reasonable opportunities to participate in the NRCB’s permitting of medium and large-sized CFOs.

AOPA’s formal permitting processes for CFOs (including public notice and comment provisions) support these objectives. Because these processes do not apply to an SFBS, the NRCB takes a cautious approach when determining whether a site is an SFBS or a CFO.

Before 2015, the NRCB’s factor-based approach used 11 factors set out in a table prepared by several NRCB staff around 2004.⁵ NRCB staff commonly refer to this table

3. The 2008 AOPA Reference Guide (p.13) contains two diagrams of a classic SFBS. This guide can be downloaded from Agriculture and Forestry website at: [http://www1.agric.gov.ab.ca/\\$department/deptdocs.nsf/all/epw5592](http://www1.agric.gov.ab.ca/$department/deptdocs.nsf/all/epw5592).

4. As Agriculture and Forestry noted in a 2012 report, “there are a vast number of different management styles for SFBS in Alberta. No two sites are the same which is not surprising. (Agriculture and Forestry, “Seasonal Feeding and Bedding Site Determination Project – Final Report” (December 2012).)

5. A factor-based approach was also used by NRCB board members in their 2002 review decision, in *Prairie Feeders (Bassano) Ltd.*, NRCB Board Decision 2002-03.

as the “2004 guide.” The NRCB did not officially adopt the 2004 guide as policy, but NRCB staff did have access to it.

2.3 The hybrid decision tree and factor-based approach in the 2015 guide

The 2004 guide provided staff with considerable flexibility and discretion to account for site-specific circumstances. However, this flexibility gave rise to concerns about consistency and clarity. Around 2010, members of the Technical Advisory Group (TAG) started considering new approaches to address these concerns. As part of this work, the TAG members conducted numerous site visits and had many discussions. This TAG effort, together with several years of NRCB experience, considerable discussion among NRCB staff, and collaboration with Agriculture and Forestry, led to a better understanding of “over-wintering.” According to the 2015 policy, this work led to a general consensus that:

- a facility is a CFO facility if it is used to confine and feed cattle anytime between July 1 and September 15; and,
- a facility is an SFBS if it is used only to confine and feed components of a “cow-calf operation” outside of the July 1 – September 15 grazing period.

The 2015 guide adopted a decision tree with two levels, based on these two circumstances. If neither circumstance applied, then under the 2015 guide the factor table needed to be considered.

The 2015 factor table resembled the factor table in the 2004 guide, but removed three of the 2004 factors, modified several of the other factors to reflect current cattle management practices, and added livestock density as a new factor. As a result of these changes, the table in the 2015 guide was simpler than the 2004 guide.

3. Overview of the 2018 guide

As noted in section 1 above, the research and discussions since the NRCB adopted the 2015 guide led to a general consensus that one additional circumstance should be added to the decision tree, and that several refinements of the factor table, are warranted. The attached, new guide reflects this consensus. This section provides a brief overview of the guide; section 4 below explains the new aspects of the guide.

As with the 2015 guide, the 2017 guide starts with a decision tree and then uses a factor table to distinguish between CFO and SFBS facilities, if required.

Under the first level of the decision tree, a facility is *automatically* considered a CFO facility if it is used to confine and feed cattle between July 1 and September 15, no matter what type of cattle are being fed at that time or how the facility is used the rest of the year.

If the facility is not used for confined feeding during that time period, the next question is whether the facility is used only for a cow-calf operation outside of the “grazing period” (that is, when grass is generally available for grazing). If the facility meets this criterion, it is automatically considered an SFBS.

The third level of the decision tree addresses whether a facility is adjacent to a permitted CFO and, if it is, whether it should be considered a CFO facility or an SFBS. (Section 4 below provides guidance on determining adjacency.)

When applicable, the automatic classifications in the steps of the decision-tree provide greater consistency and certainty than a multi-factor determination.

If a facility cannot be classified as a CFO or an SFBS under the three decision levels discussed above, then the facility must be assessed based on the nine factors listed in Table 2.

The overall guide should be applied while recognizing that cattle operations may include a wide variety of facilities to confine livestock. For a single operation, some facilities may be an SFBS and some may be a CFO facility. In addition, a single facility may be used as an SFBS at one time in a given cattle management cycle and as a CFO facility at a different time in the cycle. Therefore, the CFO/SFBS determination should be made on a facility-by-facility basis and, for each type of use of each facility.

To fully understand how a given facility is being used, Field Services staff should also consider how the facility use relates to:

- other facilities at the same overall operation
- the operation's overall cattle management cycle

If a given facility is used as a CFO for part of the year, it is considered to be a CFO. It requires an AOPA permit if the number of livestock confined in the overall CFO (that the facility is a part of) exceed the thresholds set out in the Part 2 Matters Regulation. This outcome holds true even if the facility is used as an SFBS (or for some other purpose, or not at all) for the remainder of the year.

A CFO/SFBS determination is valid only for the management practice and other relevant circumstances on which the determination is made. If the management practice or any of the assumptions used in making the determination change, the operation will need to be re-evaluated. That said, markets and other non-climate related factors may affect how a facility or area is used from year to year, so these variances may need to be considered when determining an operation's management practice as of a given time.

4. The three criteria in the decision tree part of the 2018 guide

4.1 A facility used for confined feeding between July 1 and September 15 is a CFO facility

As discussed in part 2 above, grazing periods vary throughout the province and depend in part on cattle and land management objectives, among other factors. These circumstances make it difficult to identify the *outer* limits of grazing periods. However, there is a general consensus that cattle can graze *anywhere* in Alberta from July 1 to September 15. This two and a half month summer period should therefore be considered as the *minimum* extent of a *non*-over-wintering period throughout Alberta.

Accordingly, under the guide, a facility used to confine and feed cattle during the July 1 to September 15 period is a CFO facility, rather than an SFBS. This result is regardless of how the facility is used at other times of the year, and regardless of the other factors in the decision tree and table below the decision tree. (As noted in section 1 above, however, a facility used for short term handling in the summer is not considered a CFO.)

4.2 A facility used solely to confine and feed a component of a cow-calf operation is an SFBS (unless feeding occurs during the grazing period)

As noted above, under the 2015 guide, a facility used solely for a cow-calf operation is automatically considered to be an SFBS, if no livestock are confined and fed in the facility during the July 1 – September 15 grazing period.

This approach is based on a consensus among TAG and Policy Advisory Group (PAG) members and was confirmed in a February 28, 2013 memorandum from the deputy minister of Agriculture and Forestry. The logic for this approach is that cow-calf operations are primarily grazing operations and the CFO definition in AOPA clearly excludes facilities where livestock are sustained by grazing. Thus, the existence of “pure” cow-calf pairs in a facility is an indication of “over-wintering” or, in other words, of a “seasonal feeding and bedding site.”

Based on the work of the TAG members, the NRCB believes that Alberta cow-calf operations typically have the following components:

- pregnant or lactating cows
- replacement heifers (purchased or raised)⁶
- bulls used for in-herd breeding
- cull cows⁷
- freshly weaned, homegrown calves produced from the operation’s own breeding herd, up until (but excluding) the calves’ second grazing season

A cattle facility used to confine and feed any of these cow-calf components outside of the grazing period will be considered an SFBS rather than a CFO facility. However, care must be taken to consider *all* uses of a given facility. A cow-calf operation can be part of a larger cattle operation, so a facility may be used not only for cow-calf purposes but also for confined feeding of cattle that are not part of the cow-calf component.

As noted above, a facility used solely for cow-calf purposes is considered an SFBS only if the facility is not used to confine and feed cattle during the **grazing period**. In the 2015 guide, the relevant **grazing period** was July 1 – September 15. However, the NRCB now believes that this time period is too narrow; the grazing period should cover the entire time when grass is generally available.

Under this approach, if a cow-calf operation is confining and feeding cattle in a facility within this period, the facility cannot automatically be considered an SFBS. Rather, the facility must be evaluated using the factors in table 2 of the guide. To determine when a grazing period generally occurs in a given region, Field Services staff should consider the grazing period used by grazing cooperatives in that region, or in similar regions.

4.3 When the facility is adjacent to a CFO

The 2015 policy stated that the user of the guide must consider the “proximity of the facility in question to an established CFO.” According to the 2015 policy, if the facility is “adjacent to a CFO and has permanent infrastructure, and is used for feeding any cattle, the facility should be considered part of the overall CFO, regardless of when that feeding occurs.”

The 2015 policy explained that this approach to “adjacent facilities” was based on the NRCB board members’ decision in *Prairie Feeders (Bassano) Ltd.*, NRCB Board Decision 2002-03.

6. According to Agriculture and Forestry and cattle industry specialists, cow-calf operations in Alberta typically retain 10 to 15 per cent of the cow breeding herd as potential replacements, but the percentage can be as high as 30 per cent.

7. According to Agriculture and Forestry and cattle industry specialists, up to 30 per cent of breeding cows are culled each year at cow-calf operations in Alberta.

While the 2015 policy noted that adjacency should be considered, the 2015 policy did not specifically incorporate this criterion into the accompanying guide.

The 2018 guide includes adjacency as the third level in the decision tree. Under this level, if the facility in question is an “adjacent facility” (that is, if it is adjacent to a CFO), then it is considered an SFBS only if it has *all* of the characteristics listed in Table 1 of the guide. The adjacent facility is a CFO facility if it lacks any one or more of these characteristics.

If the NRCB considers an adjacent facility to be part of a CFO, the adjacent facility does not automatically require a permit under AOPA. To determine whether a permit is needed, the NRCB would also need to determine whether the CFO (including adjacent facilities) is above the permit thresholds in the regulations under the act.

4.3.1 The characteristics of an “adjacent SFBS” (Table 1)

Table 1 lists eight characteristics that essentially mirror the characteristics in the SFBS column of Table 2. Viewed together, the Table 2 characteristics provide a sliding scale for determining whether the subject facility is a CFO facility or an SFBS. The SFBS test in Table 1, for facilities that are adjacent to a CFO, is more rigorous than the test in Table 2, for non-adjacent facilities. Under Table 1, an adjacent facility can qualify as an SFBS only if it falls essentially at the very end of the sliding scale on Table 2. By contrast, a facility might qualify as an SFBS under Table 2, but not qualify under Table 1 if it is adjacent to a CFO.

This rigorous approach toward adjacent facilities is consistent with the board’s view, in *Prairie Feeders*, that adjacent facilities contribute incrementally to the nuisance and environmental risks posed by CFOs. Typically, the incremental risks of an adjacent SFBS are quite small, but the assumption applies only if a facility is at the far, SFBS end of the CFO-SFBS spectrum.

4.3.2 When a facility is considered “adjacent to a CFO”

Before applying the factors in Table 1, it is necessary to decide whether the facility in question is even “adjacent” to a CFO. A facility is clearly adjacent to a CFO when it shares a boundary with a CFO facility—that is, when the two facilities have a common fence line or feed alley.

However, the “common boundary” criterion should not be applied so literally or strictly as to frustrate the manure management purposes of AOPA and the board’s decision in *Prairie Feeders*. Thus, a facility in question might be considered “adjacent” to a CFO if the facility is within or adjoins the same quarter section where some or all of the CFO facilities are located.

Likewise, a facility might be adjacent to a CFO if the facility relies exclusively on power, water, labour, or other resources from a nearby CFO. In this circumstance, the facility in question is *functionally* adjacent even if not immediately adjacent from a geographical standpoint.

5. The multi-factor table in the guide (Table 2)

As noted in section 3 above, when none of the three characteristics in the decision tree lead to a conclusive CFO or SFBS classification, the factors in Table 2 must be used to classify the facility as a CFO facility or an SFBS (unless neither category fits).

The first column in the table (on the left side) lists each generic factor. The second and third columns state the typical “bookend” CFO and SFBS characteristics for each factor.

When assessing these factors, Field Services staff must consider their combination or totality. While each factor is indicative of a CFO or an SFBS, no single factor is likely determinative.

In addition, when considering all of these factors, staff must avoid giving the factors equal weight and then counting the number of factors that support each option. Rather, staff must make a qualitative assessment of all relevant factors based on their own experience and the underlying objectives described earlier.

A qualitative judgement is especially appropriate given that, for most of the generic factors listed in the first column, the characteristics listed in the second and third columns represent two ends of a spectrum. There will likely be instances where the observed characteristic for a given factor does not perfectly match either of the two characteristics listed in the table. (For example, the observed density could be somewhere between 170 and 100 animals per acre, rather than more than 170 or less than 100.)

In these instances, Field Services staff will need to decide whether the observed characteristic falls more toward the CFO or the SFBS end of the spectrum. If the observed characteristic is squarely in the middle, the relevant factor cannot be given any weight in the overall determination.

5.1 New factor: maximum number of animals being confined

The new factor in Table 2 is the maximum number of animals being confined in the facility at any one time. A facility containing more than 1,000 head is a typical characteristic of a CFO facility, while a facility with fewer than 1,000 head is characteristic of an SFBS.

These characteristics are based on the 2012 AF study discussed above. That study assessed several SFBSs in Alberta and found that the average number of head at those sites was about 1,000.

If the animals being confined in the facility in question include calves produced from the owner’s own cow/calf operation, NRCB staff should count those “home grown” calves only if they are combined with purchased feeders. If home grown calves are not combined with purchased feeders, then they are part of a pure cow/calf operation and are therefore not relevant to considering whether the facility has more or less than 1,000 head.

5.2 Excluded factor: runoff risks

As with the factor table in the 2015 guide, Table 2 in the new guide excludes risk of runoff. This exclusion is reasonable because both a CFO facility and an SFBS can pose runoff risks. The amount of risk depends on where a facility is located, and how it is constructed and managed. AOPA provides tools to address runoff risks from both types of livestock facilities. In addition, runoff risk is a partial function of the other factors listed in the table, so assessing it as a separate factor is somewhat redundant.

As the 2015 policy stated, the NRCB’s future experience in applying the factor table (and the overall guide) will likely provide information that will warrant further clarifying or otherwise modifying the factors.

6. Documenting the CFO/SFBS determination, and peer review

When making a CFO/SFBS assessment, Field Services staff should document how they applied the guide, starting with the decision-tree criteria and then the table, where applicable. This explanation must discuss how the staff considered each factor in the table (where applicable) and the observed characteristics relating to each factor. Staff must document their decision in writing even if they conclude that the facility is neither a CFO facility nor an SFBS.

The written explanation should also include any assumptions staff made and relevant information provided by the operator and other parties. Staff will provide a written copy of the CFO/SFBS determination to the cattle producer, and to other parties when appropriate.

The NRCB recognizes that CFO/SFBS determinations are often complex. Field Services staff should seek advice from management and their peers as they work through the analysis and documentation of a CFO/SFBS determination. The need for peer review is especially critical in situations where the CFO/SFBS guide is being used for grandfathering purposes (in other words, to determine whether a facility or operation existed as a CFO on January 1, 2002).

Guide for Distinguishing Between a Confined Feeding Operation (CFO) Facility and a Seasonal Feeding and Bedding Site (SFBS)

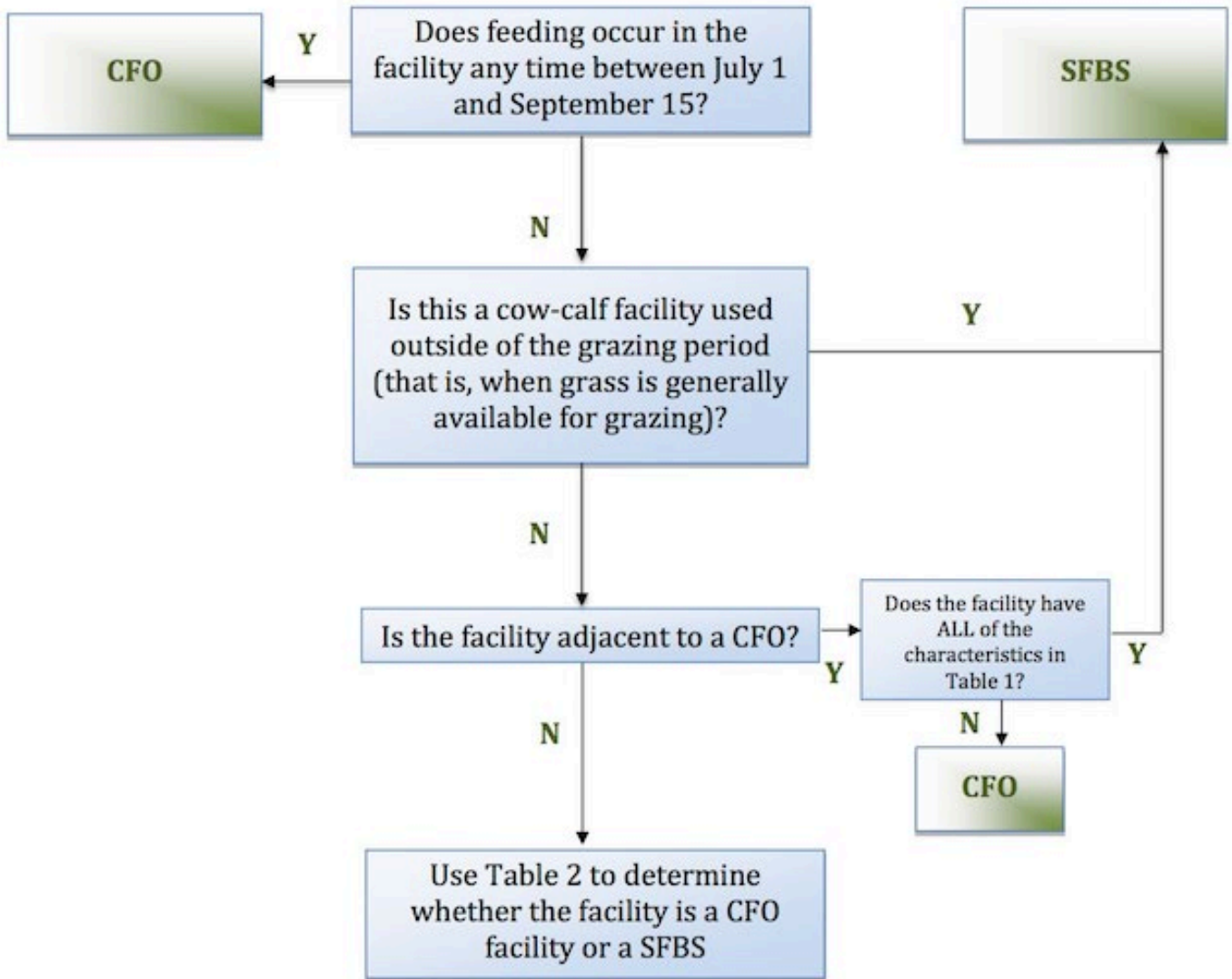


Table 1. Factors for assessing facilities adjacent to a CFO

Factors	Characteristics
Timing of feeding in the facility	Only when grazing is unavailable
Livestock type	Any livestock types other than finishers
Bedding site	Bedding sites are moved within or across years
Feeding area	Cattle have 360° access to the feeding area and the feeding area is moved within or across years
Manure management	Manure is spread over a large area requiring little or no management within the facility footprint.
Density of confinement	< 100 animals / acre
Infrastructure	Little or no permanent infrastructure
Vegetation	Pasture or annually cropped; the land has been and continues to be suitable for grazing, or the land has been and continues to be cropped

Table 2. Factors for CFO/SFBS determinations

Generic factors	Typical characteristics	
	CFO	SFBS
Timing of feeding in the facility	When grazing is available	When grazing is unavailable
Livestock type	Finishers or feeders (or mix of both), can also have backgrounders	Feeders or backgrounders (or mix of both)
Bedding site	Permanent	Moved within or across years
Feeding area	Fence line feeding using permanent bunks	Cattle have 360° access to the feeding area and the feeding area is moved within or across years
Manure management	Concentrated in the facility—must be removed and spread or stored	Manure is spread over a large area requiring little or no management within the facility footprint.
Density of confinement	≥ 170 animals / acre	< 100 animals / acre
Infrastructure	Significant permanent infrastructure	Little or no permanent infrastructure
Vegetation	No vegetation	Pasture or annually cropped; the land has been and continues to be suitable for grazing, or the land has been and continues to be cropped
Max # of animals being confined at any one time	> 1,000 head	< 1,000 head

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

Edmonton Office

4th Floor, Sterling Place
9940 - 106 Street
Edmonton AB T5K 2N2
T 780-422-1977

Airdrie Office

Airdrie Agriculture Regional Centre
97 East Lake Ramp NE
Airdrie AB T4A 0C3
T 403-340-5241

Lethbridge Office

Agriculture Centre
100, 5401 - 1 Avenue S
Lethbridge AB T1J 4V6
T 403-381-5166

Morinville Office

Provincial Building
201, 10008 - 107 Street
Morinville AB T8R 1L3
T 780-939-1212

Red Deer Office

Provincial Building
303, 4920 - 51 Street
Red Deer AB T4N 6K8
T 403-340-5241

NRCB Reporting 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.

Copyright 2018