



September 27, 2024

Re: TIER Quantification Protocol for Reducing Greenhouse Gas Emissions from Fed Cattle

On behalf of Alberta's beef industry, we are collectively writing to express our support for a major review of the TIER Quantification Protocol for Reducing Greenhouse Gas Emissions from Fed Cattle. As you are aware, Environment and Climate Change Canada (ECCC) has recently published the proposed protocols for reducing enteric methane emissions from beef cattle (REME). Alberta, which constitutes 70% of Canada's cattle market, is excluded from the federal protocol due to the existence of a provincial program which holds precedence.

Our province has been a leader in methane emissions reduction through the TIER program, and a major review and update of these protocols would provide an opportunity for Alberta's fed cattle sector to continue achieving beneficial outcomes.

Alberta's current provincial protocol presents certain limitations, including:

1. **Project expiration:** Projects under the provincial protocol can expire after 10 years, meaning early adopters in Alberta will be unable to leverage new technologies as they evolve.
2. **Carcass weight data requirement:** The provincial protocol requires carcass weight data, which not all producers have access to.
3. **Ineligibility of backgrounding feedlots:** Alberta's protocol excludes backgrounding feedlots, even though these operators are permitted under the federal protocol.


To ensure Alberta's cattle sector remains competitive and sustainable, the Alberta Cattle Feeders' Association and Alberta Beef Producers respectfully request a major review of Alberta's *Quantification Protocol for Reducing Greenhouse Gas Emissions from Fed Cattle*. We recommend the following amendments to improve the protocol's effectiveness:

1. **Methane-reducing feed additives:** Recognize the impact of methane-reducing feed additives and incorporate them into the protocol.
2. **Rolling 10-year baseline:** Implement a rolling baseline to trail the current project year by 10 years, advancing by one year thereafter. This will encourage continuous innovation and improvements in emissions reduction practices.
3. **Align with federal REME protocol:** Allow backgrounding feedlots and operations with only live weight data to be eligible under TIER. Additionally, include steam flaking of corn as a recognized methane-reduction measure.

We would also suggest that a streamlined methodology be developed for amending protocols in the future, as we are seeing rapid changes in technology which may provide additional opportunities for reducing methane emissions. Finally, we request consideration for a more simplified data quantification process which would encourage participation in the program by making it easier to participate and more economically beneficial to producers.

Thank you again for your attention to this matter, and we welcome the opportunity to further discuss our requests. A major review of the TIER protocols will allow cattle feeders in Alberta to remain competitive with their counterparts across the country and promote sustainable outcomes for both industry and the province.

Sincerely,



Melissa Downing
Director of Regulatory and Sustainability
Alberta Cattle Feeders' Association
m Downing@cattlefeeders.ca
Cell: 780-753-1934



www.cattlefeeders.ca



Mark Lyseng
Government Relations and Policy, Lead
Alberta Beef Producers
markl@albertabeef.org
Cell: 780-878-8243



www.albertabeef.org