



Alberta Technology Innovation and Emissions Reduction  
Climate Regulation and Carbon Markets Branch  
Alberta Environment and Protected Areas

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**RE: Draft Quantification Protocol for Reducing Greenhouse Gas Emissions from Fed Cattle Version 4.0**

Dear Assistant Deputy Minister McDonald,

Thank you for the opportunity to consult with your Division on this protocol and for engagement with industry during the review process. Alberta Cattle Feeders' Association and Alberta Beef Producers represents the cattle sector in our province, which includes 70% of all cattle fed in Canada. We appreciate the effort to update the protocol to reflect new opportunities which have evolved in the industry, and to make the protocol more user-friendly for producers to initiate and maintain projects.

We were pleased with the majority of the amendments to the protocol, but feel the following would make it more relevant and accessible to feedlots in Alberta:

**Flexibility in Market Destinations Post-Backgrounding**

The revised protocol dictates that cattle must move directly to a finishing feedlot if backgrounded under the protocol. Market conditions are dynamic, and producers may choose to redirect cattle to alternative markets where better value exists. This flexibility should not disqualify projects, as the methane reductions achieved during the feeding period remain valid regardless of the cattle's eventual destination. We would ask for an amendment to the protocol which recognizes and accounts for the emissions reductions accrued during backgrounding, independent of what happens afterward.

**Inclusion of 3-NOP**

The release of this draft protocol should have been delayed until the soon-anticipated release of peer-reviewed data to support the inclusion of 3-NOP (3-Nitrooxypropanol) as a quantifiable method for methane reduction. Premature release of this draft protocol results in a missed opportunity for Alberta to be a leader in supporting marketplace adoption of methane-reduction technologies. We would encourage TIER to **develop an efficient approval process for incorporating new, proven technologies into the quantification as they come to market** in this rapidly evolving space, rather than needing to conduct a comprehensive review process for updating the protocol.

Thank you again for the opportunity to comment on the suggested revisions to the Quantification Protocol for Reducing Greenhouse Gas Emissions from Fed Cattle. We urge the department to develop an approval process which allows for efficient incorporation of new methane mitigation strategies into the protocol, such as feed additives. We hope this input helps improve the protocol's applicability, scientific integrity, and effectiveness in driving real and verifiable emissions reductions across Alberta's cattle sector.

Regards,



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