



May 30, 2025

Dr. Hussein Keshwani
Deputy Chief Provincial Veterinarian
Alberta Agriculture and Irrigation
Email: Hussein.Keshwani@gov.ab.ca

RE: Updating the Animal Protection Act

Dear Dr. Keshwani,

As representatives of Alberta's livestock industry, we appreciate the effort to engage with stakeholders related to potential revisions to the *Animal Protection Act* and *Animal Protection Regulation*. Agriculture is a major contributor to our provincial economy, and our farmers care for almost 5 million head of cattle and 1.5 million swine annually.

We fully support the intent of the *Animal Protection Act* and believe it plays an essential role in safeguarding animal welfare. A strong legislative framework promotes responsible care for both companion and livestock animals, while enabling meaningful enforcement in cases of neglect or abuse.

With that in mind, we would like to share our concerns regarding the recent stakeholder engagement process and highlight areas where further consultation and clarity are needed.

1. Lack of information and Process Transparency

Due to the lack of information provided prior to the engagement session, it was challenging to come to the session fully prepared and informed. In addition, no further information was received after the engagement session, such as a copy of the slide deck presented. A more transparent and timely process, where proposed amendments are shared in advance, would significantly improve the quality of engagement and allow for more meaningful input from the livestock sector.

2. Industry Codes of Practice

There was discussion around the possible inclusion or referencing of the National Farm Animal Care Council's (NFACC) Codes of Practice in legislation. While we can appreciate the desire of enforcement officials and legislators to have a more fulsome understanding of "generally accepted practices," we do not support the inclusion or reference of the Codes within legislation. While the Codes are developed through science-informed, multi-stakeholder processes, and represent widely accepted standards for animal care in Canada, legal and enforcement was not involved in the development. This lack of thorough development leads to issues with implementation, interpretation and enforcement of the codes by officers and the legal system. Embedding the Codes within legislation creates a situation where the Codes must cater to the lowest acceptable common denominator and makes it difficult to make meaningful improvements.

It should also be recognized that the Codes are not written with the intent of being used in legislation. Our industries have fulsome programming that encompasses animal welfare standards, and these programs, along with Codes can be used to inform enforcement without being directly referenced within legislation. Further, requiring the code would necessitate a system wide increase in capacity, funding and

expertise withing enforcement. We do not accept the premise that simply because other provinces have taken this path, Alberta must do the same. In fact, Saskatchewan is reviewing the process and potentially stepping away from the code being more than educational.

3. Scope of Site Inspections

Serious concerns were raised about whether a specific complaint could trigger inspections of an entire property, including areas unrelated to the initial concern. This has significant implications for producers with large, multi-site or multi-species operations. Expanding the scope of inspections beyond the subject of a complaint not only risks regulatory overreach but also raises serious biosecurity concerns. We recommend that inspections remain narrowly focused and complaint-driven, with clear protocols to protect animal health, producer privacy, and operational integrity.

Overall, the level of engagement to date has not reflected the serious potential impact these legislative changes would have on the livestock sectors. We respectfully request more fulsome engagement moving forward to ensure that our industries are not unintentionally negatively impacted by the legislative changes. This process could be simple with government providing a clear outline of the proposed changes, what the changes mean for livestock producers, and how the livestock industries can be assured that the changes will not provide animal activists with an increased opportunity to disrupt the livelihoods of Alberta livestock producers.

This is an important discussion for livestock organizations and producers, that without thoughtful engagement, could adversely impact one of Alberta's major economic drivers and the people and communities that depend on the livestock industry.

We thank you for your time and consideration. We look forward to further input and engagement on this topic.

Regards,



Janice Tranberg
President & CEO, Alberta Cattle Feeders' Association



Darcy Fitzgerald
Executive Director, Alberta Pork



Brad Dubeau
General Manager, Alberta Beef Producers