



PEW COMMISSION ON
INDUSTRIAL FARM
ANIMAL PRODUCTION

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Cleaning up the air, down on the farm

Recently, the Bush administration found agreement with a group of lobbyists for some of the nation's biggest industrial farms. What the public got out of it was a proposal by the U.S. Environmental Protection Agency (EPA) to eliminate the requirements for industrial farming facilities to disclose toxic gas emissions, as currently mandated by law. While few could fault the EPA for trying to take the concerns of the animal agriculture industry into consideration, developing a new policy on agriculture air emissions that ignores the concerns, advice and input from any other stakeholder just plain stinks.

A \$100 billion annual industry, livestock and poultry are raised on over 1.3 million farms across the United States. But, whereas in years past farms raising animals were spread over a wide area, and located far from cities and towns, that is no longer the case.

With increasing land costs and today's marketplace favoring the economy of larger scale production, bigger industrial food animal production facilities have become the norm. In 1934, according to the U.S. Department of Agriculture, there were 11,405 facilities that hatched chickens, but by 2001 that number had declined to just 323. In fact, consolidated animal feeding operations (CAFOs), the largest and most concentrated farms, make up only 5 percent of livestock operations yet produce 40 percent of U.S livestock production. Sometimes containing thousands to tens of thousands of animals, these industrial farms produce enormous amounts of waste.

A source of dust, noxious gases and unpleasant odors, air emissions from industrial farms are nothing to sneeze at. According to the National Academy of Sciences, CAFO emissions of ammonia make up a startling half of the nation's entire ammonia emissions inventory. This poses not only a huge disposal problem but a serious threat to human health.

Many of the compounds, like ammonia, emitted by CAFOs are known to be toxic to the nervous system in sufficient concentration, and can cause respiratory symptoms, disease and impaired function. Releases of toxic fumes resulting from certain waste disposal practices also can prove fatal. Last summer, methane gas emissions from a manure pit in Virginia's Shenandoah Valley killed five people. Studies of residents living near industrial farms have documented increased rates of neurobehavioral and neuropsychiatric abnormalities.

This, in part, is why the EPA has required, since 1980, that farms report large emissions of dangerous gases such as ammonia and hydrogen sulfide. So EPA's publication of the proposed rule eliminating air pollutant disclosure requirements for industrial farms is deeply troubling.

For years, agriculture industry lobbyists have been trying to eliminate CAFO emission reporting requirements. In 2005, representatives for poultry and egg production industries submitted a

petition to the EPA arguing the reporting rules were "inappropriate, unwise public policy," and it appears that administration officials were listening. The problem, however, is that they seem to have been uninterested in hearing what other stakeholders had to say.

Decisions such as this, with the potential to impact rural communities in dramatic ways, should not be made lightly. Given the opposition that the publication of this rule has generated, there should have been consultation with others before a decision was reached.

But it appears that the EPA did not even seek input from its own Farm, Ranch, and Rural Communities Advisory Committee -- a group recently organized to advise EPA officials on how to manage controversial issues such as air pollution from agriculture. Worse still, the agency didn't even wait for the results of its own two-year nationwide study of CAFO air emissions started last June. Designed to gather data from 24 sites in nine states, the study, ironically, was trumpeted by EPA Administrator Stephen L. Johnson as an opportunity to, "do what's good for agriculture, good for our environment, and good for the American people."

While the emissions of farms have been the topic for countless jokes over the ages, the threat posed by noxious gasses emissions from industrial farms to our nation's rural communities is no laughing matter.

Issuing a controversial proposed rule that exempts large animal feeding operations from reporting noxious gas releases, without consulting your own advisory committee or newly gathered research, is not only bad policy but an abrogation of public trust.

The millions of people across America living today near large industrial farms deserve better. The EPA owes the public a serious accounting of the decision making process on these draft rules.

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