Statement by the Animal Agriculture Alliance Coalition on Farm Waste Management in Animal Agriculture

How farmers and ranchers manage and use animal manure is the most meaningful predictor of our environmental performance – *the quantity of manure produced by our animals is not*.

Too often, too much emphasis is misplaced on the quantity of manure produced by our animals. The more critical metric is how well the manure is being used to support crop production (because of its nutrient and organic matter content).

Manure is being successfully substituted for large quantities of commercial fertilizer in crop production throughout the U.S., resulting in substantial energy savings. For example, in the case of corn production, energy savings from the substitution of swine manure for commercial N fertilizer result in net energy savings on the order of 31 to 34 percent.[i] Such substantial energy savings, of course, also translate into substantial reductions in greenhouse gas emissions.

The nutrient and energy savings that manure use creates is often overlooked or taken for granted. Many people don't know that our livestock and poultry production systems across the country are engaged in an efficient, expansive nutrient and organic matter recycling program that makes a major contribution to helping feed the U.S. and much of the world while cutting down on the use of commercial fertilizers and, in the process, supporting energy conservation and the reduction of greenhouse gas emissions.

Compared to modern large hog operations, human sewage treatment systems, on average, generate about 125 gallons of sewage wastewater for every one gallon from the hog operation.[ii]

In modern poultry operations, this ratio would be closer to 125 to zero – poultry manure in modern operations is not mixed with water and is handled in dry form for land application.

While human sewage wastewater receives various degrees of treatment, the end product discharged to rivers and streams still contains organic matter and commonly includes pathogens of various forms, human hormones, pharmaceuticals and other substances. The wastewater treatment process also generates problematic substances like heavy metals. About 47 pounds of bio-solids per person per year are applied for crop production.

Do America's livestock and poultry generate more fecal matter than humans? Yes, but the animals don't take showers, do laundry, wash dishes or anything else that contributes to the large volumes of grey water that get mixed with, and are contaminated by, human feces. To suggest that 10,000 pigs contribute the same volume of waste as a town of 20,000 to 50,000 is simply wrong, misleading, and not the point.

Comparing the quantity of animal manure produced versus human sewage fails to take into account the total volume of waste water that accompanies human sewage – *this dwarfs the volume produced by animal agriculture.*

Poorly or improperly managed animal manure or human waste can cause water and air quality problems and the goal of our manure management systems are to ensure this does not occur.

Such problems also can result from municipal wastewater treatment systems, where the discharge of untreated raw human sewage is common. For example:

- In 2005, flooding in northeast Kansas damaged two Leavenworth sewer lines that then dumped 2 million gallons of sewage into the Missouri River daily until the problem was fixed.[iii]
- The state of Indiana reported in 2005 that every year at least 1 billion gallons of untreated sewage flows into waterways and ditches and onto the ground in neighborhoods all over Indiana from pipes that carry both raw sewage and storm water.[iv]
- In the last quarter of 2007, the Iowa DNR reported 31 discharge incidents involving a total of more than 2 million gallons of human sewage into the state's rivers and streams. Over the same period, just five incidents of animal manure discharge were recorded, totaling less than 8,500 gallons.[v]

Without question, manure that is not managed or used properly can cause environmental damage.

Numerous state regulatory programs are already in place that govern farmers' use of manure – *these mandatory measures should be given time to work.*

EPA is finalizing its mandatory manure management requirements to protect water quality for all large livestock and poultry producers

For the last several years, major livestock and poultry producing states have enacted mandatory laws and regulations to ensure that manure used in crop production is properly applied;

And now, under the U.S. EPA's mandatory requirements in the CAFO rule, for the first time **ALL** large livestock and poultry operations will be subject to these requirements.

All these operations **MUST** effectively achieve "zero discharge" of manure from their animal housing and manure storage and treatment areas.

Also, any of the operations applying manure to land they control **MUST** do so in full conformance with EPA-approved agronomic and conservation practices and standards, and keep records to demonstrate this. These mandatory provisions are designed to avoid and minimize any incidental runoff of manure nutrients from our cropland into surface water.

Farmers and ranchers intend to fully comply with these requirements; their adherence to these stipulations will provide a tremendous measure of water quality protection.

We fully expect that EPA and the state regulatory agencies will implement and enforce these mandatory requirements.

These measures must be given time to work.

Any attempt to link manure management to the public's legitimate concerns about antibiotic resistant pathogens are ill-advised and unfounded in light of CDC's views.

Methicillin Resistant *Staph aureus* is a serious public health issue and animal agriculture supports sound and effective public health measures, on and off the farm, to address it;

There are three primary forms of MRSA:

- The virulent forms commonly found in healthcare settings like hospitals, dialysis centers and long term care facilities.
- Less invasive forms of MRSA commonly found throughout the general population that are also found in cats, dogs, horses and other animals.
- A third form that is less invasive than the healthcare associated form and has been found in some people who have close contact with livestock and poultry, although there is no data to indicate that producers have a higher than normal illness rate.

In the CDC's February 4, 2008 letter to the House Agriculture Committee, the CDC reports:

- The "CDC and others have investigated numerous outbreaks of community-associated MRSA outbreaks in the United States, and **in none of these investigations has animal exposure been identified as a risk factor for infection**."
- Of the 94,000 cases of the more virulent form of MRSA, more than 80 percent are the result of patient to patient transmission.
- There are several million cases a year of the less virulent forms of MRSA and CDC indicates that the "vast majority" of these incidents are the result of person-to-person transmission.
- "Thus far there is no documented role for meat consumption or handling in MRSA transmission."[vi]

We encourage concerned parties to take these CDC findings into full and proper account. We further request that such parties cease the improper linking of manure management practices to the very serious forms and incidents of MRSA. It will require the best that the American public health system has to offer in order to effectively address the issue.

Animal Agriculture Alliance Coalition Members

American Farm Bureau Federation
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Animal Health Institute
American Meat Institute
National Chicken Council
National Milk Producers Federation
National Pork Board
National Pork Producers Council
National Turkey Federation
United Egg Producers
U.S. Poultry & Egg Association
United Soybean Board

Sources

[i] See McLaughlin, N.B., Hiba, A., Wall, G.J. and King, D.J. 2000. Comparison of energy inputs for inorganic fertilizer and manure based corn production. Can. Agric. Eng. 42:009-017. http://engrwww.usask.ca/oldsite/societies/csae/c9915.pdf

[ii] See attached--Lory, J.A., Zulovich, J., Fulhage, C., 2007. Hog Manure and Domestic Wastewater Management Objectives. MU Extension, University of Missouri-Columbia. www.extension.missouri.edu

[iii] Kansas City Star, October 4, 2005.

[iv] Indianapolis Star, September 27, 2005, and from the Indiana Department of Environmental Management.

[v] Based on Animal Agriculture Alliance analysis of the Iowa DNR reports on all incidents over this period. See the attached list of all these referenced incidents with web links to the associated press releases.

[vi] See the attached February 4, 2008 letter from Dr. Julie Gerbeding, Director of the CDC, to the Honorable Collin Peterson, Chairman - House Committee on Agriculture.