

Wisconsin Dairy Alliance, Venture Dairy Cooperative: Anti-CAFO activists' report demonstrates CAFOs are good stewards of nutrients

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Wednesday, April 20, 2022: Midwest Environmental Advocates (MEA) recently published its [Spring 2022 Advocacy Update](#) which makes it clear that advocating for CAFO crushing regulations are top of mind. The update highlights a recently released report regarding the availability of land and manure spreading. Although MEA attempts to advocate for the elimination of CAFOs, the report actually acknowledges that concentrated animal feeding operations ("CAFOs") are doing a good job applying manure and protecting our water.

The study concludes there is not enough land to safely reuse the manure generated by animal feeding operations ("AFOs") of all sizes. The study used geo-mapping and application simulation to reach this conclusion.

The report calculated animal units (AU) per farm located in a county and applied an estimated rate of manure produced and an estimated amount of commercial fertilizer used per county. The report based its conclusion on the land available within the same county for spreading manure at a distance of approximately .49 miles from the farm.

This conclusion and the methodology employed are, of course, laughable. It blatantly ignores the reality of how manure is spread in Wisconsin and the vastly different conditions for CAFOs vs AFOs ("animal feeding operations <700 Cows"). It may be surprising to MEA to learn that farming operations cross county lines. Livestock operations utilize crop fields for nutrient applications over county lines and well beyond a half-mile radius of the homestead.

Further, in Wisconsin, CAFO's are required by law to have and comply with a state-issued water quality protection permit that "requires a field-specific, phosphorus-

based nutrient management plan (NMP) that outlines the amounts, timing, locations, methods, and other aspects related to land application of manure and process wastewater.”

While the study recognizes the regulatory burdens carried by CAFOs and the role they play in keeping our water clean: “CAFOs are required to have NMPs, and the state’s DNR reviews them during the water pollution discharge permitting process. Some counties or municipalities have adopted [additional local regulations](#) called Livestock Facility Siting Ordinances that give them the authority to independently review CAFO NMPs.” It does not include in its conclusion any recommendations for mitigating the effect from largely unregulated AFOs which “are not subject to the same stringent level of oversight and enforcement from the DNR or local governments.”

To truly solve this problem, we need to address all sources of nutrients, such as crop farms, which, like AFO-sized livestock operations, are not required to have DNR audits verifying the type and amount of fertilizer applied. Let’s also not forget landscaping, golf courses, and septic systems are additional sources of largely unregulated nitrate contamination. Not to mention, the issue of legacy nitrates and any improvements in farming practices are ignored.

You see, while MEA blasts CAFOs, they are actually part of the nutrient management solution, not the problem. CAFOs are treated differently. They are required to go through DNR’s annual stringent auditing of their manure applications to ensure compliance with the law. In fact, according to DATCP and USDA Nation Agricultural Statistics Service (NASS), Wisconsin CAFO nutrient management plans only cover approximately 7% of all total land in farms. Punishing CAFOs for the activities of others while continuing to ignore major contributors is not only unfair but will not improve soil or water quality.

We need to face the truth to make an impact. There will need to be funding to assist the 6,200 dairy farmers as well as crop farmers and others in establishing and accurately implementing NMPs for all land application of manure and fertilizer. Funds will be needed to monitor all NMPs for compliance, solutions need to be developed for manure storage on those farms that cannot afford the costs and rules and laws need to be written to ensure compliance and enforcement of standards for all dischargers, not just a few.

We cannot have a serious conversation about the impact of farming on our land and water until we bring all of agriculture up to the same standards CAFOs meet. Only then will we be able to better understand the impact of our current regulations on water quality and what it would mean if we applied those practices to all land.