



Position Paper on Concentrated Animal Feeding Operations

It is the responsibility of the legislature to the people of the State of Michigan, to protect the public health and general welfare. This responsibility includes the thoughtful oversight and regulation of Concentrated Animal Feeding Operations, (CAFOs). The regulation of CAFOs is a matter of prime concern affecting the public health and general welfare of the people of the state.

Michigan has been blessed with over 11,000 lakes and 36,000 miles of some of the world's most beautiful rivers and streams. Michigan is recognized as the home of twenty percent of the world's fresh water supply and the people and the legislature of this state are charged with the responsibility of responsible stewardship.

It is the position of the Michigan Water Environment Association (MWEA) and the Michigan Section of the American Water Works Association Section (MI AWWA) that the exercise of this stewardship involves three important steps:

- I. We must not allow run-off from fields used for manure utilization or disposal to enter the waters of the State whenever it can be demonstrated that such run-off results in a violation of Michigan's water quality standards.
- II. We must not allow for application of manure to the land without adequate consideration of weather and soil conditions or proximity to wells and surface waters.
- III. We must be careful not to create a class of unregulated industries in the state, with virtual immunity from the regulatory oversight necessary to protect the quality of drinking water available to the citizens of Michigan.

Considering that CAFOs are more similar to industry than traditional family farms and that manure can, and often does, contain human pathogens, it is the MWEA's and MI AWWA's position that:

- Michigan's natural environment and public health are best served by CAFO oversight provided by the MDEQ.
- CAFOs should be issued NPDES permits.
- Land application of CAFO manure should not be through surface application but through sub-soil injection methods or otherwise incorporated in the soil.
- Land application of CAFO manure should be subject to regulations similar to R 323.2401 et seq for Land Application of Biosolids including a land application plan, stabilization, pollutant concentrations, loading rates, nutrient parameters, and appropriate set-backs.
- Land application of manure should be subject to the oversight authority of the MDEQ, who, using current best practices, requires responsible disposal of all animal by-products.

The membership of the MWEA and MI AWWA are fully committed to promoting wise regulation of all pollutant discharges and to the protection of our source waters and support the development of a comprehensive CAFO oversight program.