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Staying abreast of emerging issues:

An analysis of the PEW Commission report

This analysis provides information and raises questions relating to a recent report and its policy-influencing potential.

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Special for Farmshine**

BALTIMORE, Md.—If you think the PEW Commission on Industrial Farm Animal Production (IFAP) doesn't have the potential to affect family dairies: think again.

Large photos throughout the Commission's executive summary and full report—Putting Meat on the Table: Industrial Farm Animal Production in America—depict not only livestock and poultry operations, but also dairy.

The full report even includes a story about a dairy, from its neighbor's point of view, as an illustration of environmental impact.

And stories from the *Associated Press* to the *Environmental News Service*, heralded the Commission's report a few months ago with not only photos of hogs and chickens, but also a photo of a typical not-so-large freestall dairy barn, captioned: "Dairy cows in an industrial farming operation."

If cows are not "accessing forage" on the pastoral front-forty, does this mean the farm is "industrial?" And if a farm is "industrial," is that really such a bad thing?

"Industry" is a good word gone bad. It originates from the Latin: "*industrius*," meaning diligent.

In fact, Webster's defines "industry" as follows: "Diligence in an employment or pursuit; *especially*: steady or habitual effort. 2 a: systematic labor *especially* for some useful purpose or the creation of something of value; b: a department or branch of a craft, art, business, or manufacture; *especially*: one that employs a large personnel and capital especially in manufacturing; c: a distinct group of productive or profit-making enterprises."

Are dairy farms diligent, steady, habitual efforts, with systematic labor, for a useful purpose, creating something of value? You bet.

Should dairy farms be productive, profit-making enterprises? Of course. How else would the family members, who own and operate the farm, earn a living?

The Commission's final report, distributed in April to policy makers, stakeholders, and media, is an eye-opener. For starters: The cover sketch of a farm worker wearing a gas-mask speaks a thousand words.

In fact, the executive summary states: "One of the most serious unintended consequences of industrial food animal production (IFAP) is the growing public health threat of these types of facilities."

This statement, alone, should serve as a chilling warning of where this report will lodge its influence.

A word count of the 29 partial-pages of summary text reveal "health" 51 times and the combination "public health," 22 times.

Superfluous adjectives abound, like: "enormous, extremely, dramatic, harmful, deleterious and tremendous," appearing a collective 25 times in 29 partial pages of text. "Large" is a descriptor 22 times, and "threat" is used 7 times. Swine are referred to 19 times, poultry or chickens 10, dairy 5, and beef 4.

Of the 15 commissioners, the chairman, John Carlin, is a former dairyman and former Kansas governor. He had strong words in the Commission's news release, stating: "The goal of this Commission is to sound the alarms that significant change is urgently needed in industrial farm animal production."

Vice chair, Michael Blackwell, is the commission's lone veterinarian, although his resume has moved toward the human health side of medicine. The former dean of the University of Tennessee College of Veterinary Medicine and former chief of staff for the Office of the U.S. Surgeon General, is now president and CEO of his own venture capital firm focusing on health care products and services.

Former U.S. Agriculture Secretary Dan Glickman is among the commissioners. Since 2004, Glickman has served as the chairman and CEO of the Motion Picture Association of America, the voice and advocate of the American motion picture, home video and television industries.

Also at the table are South Dakota State Senator Tom Dempster and an Iowa State University distinguished fellow at the Leopold Center for Sustainable Agriculture, Frederick Kirschenmann, who formerly served on the USDA National Organic Standards Board.

The remaining 10 commissioners have resumes ranging from business owners or executives, to agency directors, to university professors—each specializing in a different area of public health policy, human health care, human health behavior, human health education, infectious diseases, nutrition, food studies, food service, natural beef production, and rural life.

Among them is animal welfare expert, Bernard Rollins, a Colorado State University distinguished professor of philosophy, biomedical sciences, animal sciences and a bioethicist. During the Keystone Veterinary Conference in Hershey recently, Rollins told Pennsylvania veterinarians, industry members, and producers that the PEW Commission report is a must-read.

According to its own executive summary, the Commission “was established through a grant from the PEW Charitable Trusts to The Johns Hopkins Bloomberg School of Public Health to recommend solutions to the problems created by concentrated animal feeding operations (CAFOs) in four primary areas: public health, the environment, animal welfare, and rural communities.”

This introductory statement suggests the purpose was not aimed at examining whether problems exist, nor to what degree, but rather to plunge directly into examining solutions for problems the Commission already believed exist. The supporting peer-reviewed technical reports, which to date are not all released, are said to connect the dots.

The Animal Agriculture Alliance—a united voice for those involved in the animal agriculture and food industries—stated in its news release this summer that the PEW Commission funded itself and in effect, spent \$3.4 million to “rehash old criticisms of animal agriculture.”

Perhaps one recommendation all sides can agree on as positive, is the call for increased funding for animal agriculture research, along with the recommendation to “reform” the way research is currently conducted.

A second positive recommendation is for greater competitiveness and transparency in the livestock markets.

A third recommendation many would call positive, is to: “Implement a disease monitoring program for food animals to allow 48-hour trace-back of those animals through aspects of their production, in a fully integrated and robust national database.”

But then again, the more ‘traditional,’ bio-diverse farms the Commission’s report elevates, are often the same producers who most fervently oppose such efforts—as in the continued vocal opposition to USDA’s National Animal Identification System.

The Commission focused on meat animal production, but dairy operations are included in its definition of IFAP. An excerpt from the executive summary defines IFAP as a system that “employs high-throughput farming of thousands of animals of a single breed for a single purpose, such as the large-scale production of hogs, broiler chickens, turkeys, or **dairy cattle**, often in confined locations under highly controlled conditions using formulated foods in lieu of access to forage.”

The Commission’s recommendations are far reaching. They look to three distinct entities for achieving recommendations within 10 years: 1) To academia for support of its agenda to roll back access to some important technologies (i.e. antimicrobials) without a clear scientific basis or social imperative to do so; 2) To Capitol Hill for law-making; and 3) To the Washington bureaucracy for the creation of a new Food Safety Administration, which would roll into one federal agency the combined duties of the Food Safety and Inspection Service, USDA, Food and Drug Administration, Environmental Protection Agency and other federal agencies, to “improve the safety of the U.S. food supply.”

A point of interest is the report’s explanation that “IFAP is designed to increase production yield and decrease production costs by using high-efficiency practices that rely heavily on economies of scale as well as on a standardization of processes and end products...”

But hasn’t “standardization of end products” (mainly in the livestock and meat industry) evolved because consumers wanted a uniform product and retailers and restaurateurs demanded this uniformity?

On the environment, the executive summary recommends that “IFAP be regulated as rigorously as other industrial operations, and that a new system of laws and regulations for dealing with farm waste replace the inflexible, patchwork, and broken systems that exist today.”

Specifically, they call for environmental protection agencies, instead of state agriculture departments, to regulate IFAP waste, saying this change would “prevent the conflict of interest that arises when a state agency charged with promoting agriculture is also regulating it.”

The Commission further states that: “Our diminishing land capacity for producing food animals, combined with dwindling freshwater supplies, escalating energy costs, nutrient overloading of soil, and increased antibiotic resistance, will result in a crisis unless new laws and regulations go into effect in a timely fashion.”

Placed oddly in connection with this recommendation, is chairman John Carlin’s foreword, expressing concern about the giving way of diversified farms to “highly specialized, and highly productive animal producing operations. In Saline County (Kansas) today, there is only one dairy farm,” he writes. “Yet it and similar operations across the state produce more milk from fewer cows statewide than I and all of my peers did when I was actively farming.”

Confused? Does the Commission want more, or fewer animals? More use of feed and water, or less?

Another disturbing bit of verbiage in the report, ignores the fact that more than 98% of U.S. farms producing 86% of output, are family-owned. In the full report, the Commission’s executive director Robert Martin writes these words as the opening paragraph of the preface: “Over the last 50 years, the method of producing food animals in the United States has changed from the extensive system of small and medium-sized farms owned by *a single family* to a system of large, intensive operations where the animals are housed in large numbers in enclosed structures that resemble industrial buildings more than they do a traditional barn. That change has happened primarily out of view of consumers but has come at a cost to the environment and a negative impact on public health, rural communities, and the health and well-being of the animals themselves.”

Does this mean multi-generational, multi-family farms are negatively viewed by the Commission as “industrial?” How is generational transfer to take place then, when the assets of the older generation are tied up as the income-producing assets that keep the business and dream alive for the younger generation?

On animal welfare, the Commission seeks to phase out intensive animal production practices and recommends a government oversight system similar to that used for laboratory animal welfare.

Under this scenario, each IFAP “facility” would be certified by an industry-funded, government-chartered, non-profit entity accredited by the federal government. Federal authorities would audit IFAP facilities for compliance.

The Commission also calls for state, county, and local governments to implement zoning and siting guidance for IFAP facilities, including their proximity to schools, churches, residences, parks, waterways, and areas for protecting wildlife.

Does this mean encroaching suburbia could further dictate the future of farm families who choose to build, improve and expand to continue their business through the next generation?

A recommendation that has veterinarians concerned, is the Commission's call for a ban on "non-therapeutic" antibiotic use. The Commission's vice chair, Blackwell, states in a news release: "Lay people should not be able to go to the co-op and buy drugs to put into the food supply... It is my hope that veterinarians will become more involved in this sector."

First of all, when producers use animal health products, they must abide by the label directions for required milk withhold and meat withdrawal times, and both milk and beef are routinely tested for the presence of drug and/or chemical residues to guard against mistakes humans can make.

Secondly, there is an unprecedented large animal veterinarian shortage. This recommendation could be problematic where the rubber meets the road.

Third, does the Commission believe dairy and livestock producers are 'lay people,' not professionals?

Among the full report's 122 pages, only one dairy specific recommendation in the area of animal welfare makes the list, that of ending the practice of tail-docking. However, the finer details of the 26 recommendations include a statement that negative emotions such as fear, distress, extreme frustration or boredom, should be avoided. (As a prey animal, cows like it when nothing ever changes. Aren't bored cows, then, happy cows?)

Also embedded in the recommendations is a reference to "flooring and housing conditions on dairies: cattle kept on concrete."

And in the environmental section, there is a recommended prohibition on the installation of new liquid manure handling systems and a phase out of their use on existing operations.

IFAP is further defined in the PEW Commission full report as "farms where large groups of same-species animals are housed in confinement facilities that utilize flush systems for cleaning manure into holding ponds."

Could this describe modern dairies. You bet.

But is it fair to place a negative connotation on this description, as the Commission does? Not so fast.

Flush systems result in cleanliness for animals and at least in the case of dairy, allow for the use of superior bedding materials for comfort and hygiene, like sand. Properly designed and managed lagoons facilitate improved manure handling and crop applications of nutrient as well as the re-use of flush water. In its criticism of excessive water use by IFAP, the PEW Commission report does not identify, nor congratulate, the vast amount of water recycling that is accomplished on modern farms today.

While the primary focus of the PEW Commission report is the meat animal sector, the 26 specific recommendations pertaining to environment, animal welfare, rural community impact, and public health are a broad brush equally capable of painting the future of dairy production housing systems, feeding systems, nutrient management practices, manure handling practices, and access to animal health products.

Some of the recommendations are consistent with those supported by livestock and dairy groups, namely the improvement of animal identification systems to facilitate 48-hour trace back capability for fast response to disease outbreaks. Other recommendations read more like a page from an activist organization playbook.

Now, more than ever, it's important for dairy producers to communicate with consumers about how they are managing their farms as good stewards. How they implement nutrient management plans, use effective manure handling systems, give proper attention and care to their dairy animals, use antimicrobials prudently. It's also important to enlighten the non-farm community about how today's agricultural technologies and practices help today's farmers feed today's growing world population around them.

At the same time, the dairy "industry" should be evaluating its practices with an attitude of always wanting to do better, putting science to work to determine areas of change that balance the elements of an emerging social ethic with sound science and the practical economic realities of a growing and changing world.

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PHOTO CAPTIONS:

#1 - The collage of provocative images shaded in stop-sign-red on the cover of the PEW Commission report, communicate vividly how it views animal agriculture.

#2 - A photo very similar to this one—a familiar scene of a typical not-so-large freestall dairy barn with clean, contented Holstein cows lined up at the bunk, some turned toward the camera and others munching away at the total mixed ration laid before them—accompanied early media coverage of the PEW Commission on Industrial Farm Animal Production's final report, carrying the caption: "Dairy cows in an industrial farming operation."