



WISCONSIN CATHOLIC CONFERENCE

March 9, 2010

Mr. Mike Murray
Wisconsin Department of Agriculture,
Trade and Consumer Protection
P.O. Box 8911
Madison, WI 53708-8911

Dear Mr. Murray,

On behalf of the Wisconsin Catholic Conference, I wish to submit these comments regarding the Livestock Facility Siting rule (ATCP 51).

I offer these comments from the perspective of a religious tradition that affirms that every person has a common and universal duty to respect the environment as a common good. None of us may use natural resources simply as we wish, according to our own economic needs.¹

Our social teaching and the experience of the Church in rural communities provide the foundation for six criteria developed by the U.S. Conference of Catholic Bishops (USCCB) for use in promoting sound, holistic agricultural policies.² The criteria are as follows:

1. Do the specific agricultural policies help to overcome hunger and poverty?
2. Do they provide a safe, affordable food supply and sustainable, environmentally sound farming practices?
3. Do they ensure a decent life for farmers and farm workers?
4. Do they sustain and strengthen rural communities?
5. Do they protect God's creation?
6. Are the policies developed with the widespread participation of those who will be most affected by them?

These criteria are the basis for our comments regarding ATCP 51.

As a number of recent reports have indicated, concentrated animal feeding operations (CAFOs) are on the rise in Wisconsin. So too are concerns about their impact on rural communities, animal welfare, and environmental protection.

As a recent 3-part series in the *Wisconsin State Journal* reveals, there is growing evidence that the manure generated by CAFOs is polluting the groundwater in some parts of our state and emitting

¹ Pontifical Council for Justice and Peace, *Compendium on Catholic Social Doctrine* (2004), #466.

² For I Was Hungry & You Gave Me Food: Catholic Reflections on Food, Farmers, and Farm workers (2004).

odors that seriously disturb local residents. Some farmers report that their wells have dried up because of the enormous amounts of water used in neighboring CAFOs.

In places that already face water shortages, farmers and communities are worried that any new CAFOs would only exacerbate the situation and make water prohibitively expensive.

Some are also concerned that the expansion of CAFOs is driving out family farms because smaller farmers cannot market their products at the quantity and pricing of large-scale operations. Others are worried about the resale value of their farms because they are located too close to an existing CAFO. All the while, rental prices for additional acreage are rising as CAFOs obtain land to spread their excess manure.

There are also concerns about the way animals are treated in CAFOs—no access to their natural outdoor environment, reliance on whole herd antibiotic regimens, excessive milking, etc.

These concerns reflect an underlying perception regarding ATCP 51 on the part of many rural residents. They believe that current law affords them and their communities little or no say in the siting and operation of CAFOs.

Our Catholic tradition affirms a “principle of subsidiarity” which holds that decisions should generally be addressed at the most local level appropriate. This principle does not mean that local governments should have a veto over the actions of other levels of government. But the principle does offer a valuable safeguard so that local opinion and insights are heard and not ignored.

In light of these concerns, it seems appropriate that the Department of Agriculture, Trade and Consumer Protection revise ATCP 51 to give greater weight to the concerns of local residents and to the environmental impact of CAFOs in the permit approval process.

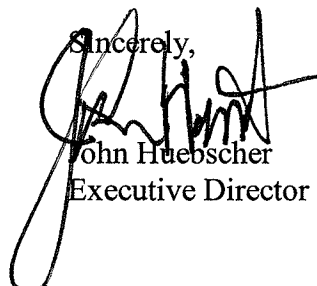
The Church acknowledges that economic development is important. However, policies like ATCP 51 should not come at the expense of family farms, humane husbandry, and a healthy environment.

We ask that you pay special attention to the rule’s impact on small and moderate farms. These farms have played and continue to play very important economic and cultural roles in our state. Family-owned and operated farms are one of the last places in our state where parents and children work side-by-side, nurturing strong family ties and a deep respect for God’s creation. We cannot afford to lose such a vital human connection with the land.

Wisconsin has a long and rich agricultural tradition that has sustained generations of family farmers. Whenever this tradition is threatened, both citizens and the state need to carefully investigate and address the issues involved, and to do so in a way that is truly collaborative.

Thank you for considering these views as you assess the future of ATCP 51.

Sincerely,

A handwritten signature in black ink, appearing to read "John Huebscher", is written over the typed name and title. The signature is stylized and somewhat cursive.

John Huebscher
Executive Director