



*Advocating for Wisconsin's Large Environmental Permitted Operations  
Who Comply with a Zero Discharge Standard*

WDA represents modern regulated dairy farms in Wisconsin and works diligently to preserve Wisconsin's heritage as the Dairy State. Our non-profit organization advocates for the truth by contesting unnecessary regulations that do not protect natural resources. The WDA believes in parity for all dischargers and works to operate under the uniform "zero-discharge" standard applied to WDA members.

"Many of today's large farms in Wisconsin have been designed and built to achieve the lowest carbon footprint ever achieved in animal agriculture. Producing a gallon of milk uses 90 percent less land and 65 percent less water, with a 63-percent smaller carbon footprint than in 1944, thanks to improvements made by dairy farmers in cow comfort, health, nutrition and breeding," according to the Innovation Center for U.S. Dairy.

Yet large livestock's impact to local water supplies is consistently called into question, with article after article blaming well-designed, well-built and well-managed large farms as the culprit.

It's a common enough PR ploy: Ignoring laws for some businesses who pollute by singling out a larger "corporate" business as a scapegoat — and then feeling good that the pollution problem was "resolved."

The push to add tougher regulations on already heavily regulated farmers ultimately does nothing to reduce pollution that has been the focus for some for years.

Let's take a moment to look at some statistics from the Wisconsin DNR and the Wisconsin Groundwater Coordinating Council Report to the Legislature for 2019.

- This is a map of the CAFO locations statewide from the WI DNR web site.
- This is a map of the estimated % of private Wells over Nitrate Standard by County with Land Cover from the Wisconsin Groundwater Coordinating Council report to the Legislature for 2019.

You would think the counties with the highest % of wells over the Nitrate standards would have the most CAFO's in them, correct? Let's take a look.

- This is a list of the top 10 counties that have CAFO's in them. Note all of the % of wells exceeding the nitrate level are under 7.1% except for Dane county at 18.2 %. All of these counties have 10+ CAFOS – some have over 20!
- Now let's look at the top 20 counties who have the highest % of wells over 10 ppm. There are only 4 counties – including Dane that have more than 5 CAFO's and ALL of these counties have over 10.4 % of their wells above the nitrate level. Take a look at Iowa county 12.5% over the nitrate level and Zero- CAFO'S.

Are CAFO's still the problem?



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Pollution comes from all sources, including unregulated small farms, crop farmers that use chemical fertilizer, home owners that haul polluting nitrates home every spring in the form of lawn fertilizer, golf courses, rural residents with substandard septic systems and outdated wells that are not compliant with today's standards.

Empathy for the small farmer is understandably strong. In Wisconsin, for instance, environmentalists and the media ignore the 1 million cows raised on unregulated farms by blaming the 300,000 cows that live on already regulated dairies for virtually all the state's groundwater ills. Why? Cost and Enforcement. Small farms are struggling, asking for more to be done will be a cost they cannot afford. While the intention may be there, enforcement only occurs if the farmer receives money from the state's taxpayers- referred to as cost sharing.

Ignorance over the impacts of crop and vegetable farming is palpable. You cannot see or smell chemical fertilizer, so therefore it must not be a risk.

The homeowner with failing septic systems or substandard well and over-applied lawn chemicals also bear some blame.

Meanwhile, government municipalities who "control release" tens of millions of gallons of human sewage annually into the state's waterways are met with overwhelming silence.

CAFOs have zero discharge permits at their production site and they are all required to have Nutrient Management Plans which contain strict guidelines on spreading. They are regulated, fined and they can be referred to the department of justice for prosecution if they are out of compliance. They are the *ONLY* dairies treated in this manner.

Wisconsin must pursue an all-encompassing approach to environmental management. To solve this issue, there needs to be a path to compliance developed for all sources.

This will not occur overnight, nor will it come without costs to all who are involved.

We believe it's time to bring everyone to the table to have a scientific discussion. WDA believes all dischargers want to be part of the solution; however, we will need trust and collaboration required to reach significant solutions.

We will need to figure out things such as cost sharing, well testing and compliance, septic system testing and compliance. The cost of effective studies that are not just part of the blame game, but move us forward giving viable solutions as the outcome. We will need to face the municipal overflows and fix them – not just renew the permit for another 5 years at the same level.

Innovation will be a key requirement, expanding our horizons looking for potential new sources to solve our problems, incenting those who bring us actionable results. Beyond regulations, beyond our habits of today.



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We will need to meet today's needs without compromising the ability for future generations to meet their own needs through a healthy environment, economic profitability and social and economic equity.

The Wisconsin Dairy Alliance is requesting the Water Quality Task force, take a leadership role in forming the future for water in Wisconsin. We ask you think about the long-range goal for Wisconsin's water, not just add regulations.

The WDA firmly stands by their belief we need to have all potential dischargers on a path to zero discharge.