April 21, 2020

Governor Kim Reynolds
1007 E Grand Ave
Des Moines, Iowa 50319

Re: Responding to the outbreaks of COVID-19 and the supply of hogs

Dear Governor Reynolds:

The Sierra Club is concerned about the ability of the meat processing plants to effectively handle the number of pigs that are being produced in the state.

**Emergency powers are needed to require the Department of Natural Resources to maintain a list of double-stocked CAFOs**

We are asking that you use your emergency powers to require the Department of Natural Resources (DNR) to maintain a list on their website of all facilities that are double-stocking animals, along with the location of the facility. By double-stocking, we are referring to any CAFO that is housing more animals than their permitted number based on their construction permit or, for those that did not use the Master Matrix, housing more animals than allowed under the statutory separation distances for the animal units housed within the building.

In an earlier emergency ruling, you allowed owners of confinements (CAFOs) to double-stock the animals. Given the current hotspots of COVID-19 at meat processing plants, we are asking that you use your emergency powers to require the Department of Natural Resources to maintain a list on their website of all facilities that are double-stocking animals, along with the location of the facility and the dates of the double-stocking.

Families living close to a CAFO may choose to shelter in another location if the CAFO near them is double-stocking.

On a normal basis, neighbors of CAFOs are under daily assault from the odors and toxic chemicals emanating from the CAFOs. The issue of CAFO manure is more than its horrendous stench. The manure is loaded with toxic pollutants such as methane, hydrogen sulfide, ammonia, particulate matter (PM$_{2.5}$ and PM$_{10}$), fungi, bacteria, and endotoxins that become airborne. The physical reaction to the toxic chemicals in CAFO manure results in nausea, running noses, sore eyes, respiratory distress, and asthma attacks. Exposure to odors can cause changes in mood.

Given that COVID-19 causes respiratory issues and people living near CAFOs are already dealing with respiratory issues, double-stocking of animals could be a serious public health issue.
Children face a special risk to air pollution because generally they are more active than adults when they are outdoors. This means that they breathe more air. When that air is polluted, children can face health effects. Further, children’s lungs are developing. “Growth and development of the human respiratory system is not complete until approximately 18-20 years of age.”\(^1\) That affects the ability of the lungs to fight off infections and to deal with pollutants.

**Emergency powers are needed to stop breeding all pigs until the pandemic passes**

The Sierra Club is asking that you use your emergency powers to order that all owners of pigs immediately stop breeding animals.

Given that the meat processing plants in the state are facing large outbreaks of COVID-19 and that a number of them have been shuttering their plants for several days, it is obvious that immediate action needs to be taken.

Linh Ta reported in the April 20, 2020, edition of the Iowa Capitol Dispatch\(^2\) that you indicated,

“This isn’t like a regular facility where you shut it down for two weeks.”

“If we aren’t able to move them through the process at some point we’re going to have to be talking about euthanizing hogs. We’re not that far from it.”

Even before the pandemic started sweeping across the state, there were indications that the market was over-supplied with hogs. Before you start euthanizing hogs, you should ensure that the owners of the breeding pigs stop breeding more. That step can be and should be taken today.

**Emergency powers are needed to protect Iowa’s waters by requiring the CAFO remain unused for the equivalent number of days that it is double-stocked**

Manure pits and manure holding tanks are designed to hold the amount of manure that is expected to be expelled by the animals in the building in a year given that most farmers empty their pits and tanks once a year. Although there is some free-board provided so that the manure does not over-top the pit or tank, the longer the animals are double-stocked, the risk increases that the pits will not be able to handle all of the manure that is created.

Iowa already has a problem with excess nutrients entering waterbodies. A major source of those nutrients is manure from confinements.

To alleviate greater amounts of nutrients entering our water, the owners of the CAFO buildings should be required to idle the buildings for the same number of days that they are double stocked so that the pits and holding tanks are not over-topped. We are calling on you to use your emergency powers to require this action.

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\(^2\) https://iowacapitaldispatch.com/2020/04/20/reynolds-no-plans-to-order-shutdowns-at-meat-plants/?eType=EmailBlastContent&elId=cd9744f-725d-4c1e-9867-d5d902c28813
Most of rural Iowa uses private wells for drinking water. If nutrients are applied beyond what can be agronomically utilized, the nutrients can seep into the wells.

For infants drinking formula made from nutrient-contaminated water, a serious health issue called blue-baby syndrome (methemoglobinemia) can arise. The baby’s skin around the mouth, hands, and feet turns blue because the nitrates cause a decrease in hemoglobin in the blood which reduces the amount of oxygen that is delivered to the baby’s cells and tissues. Infants younger than three months have the highest risk.

Further pregnant women who drink water contaminated with nitrates face an increased risk of giving birth to children with birth-defects, including neural tube defects, oral clefts, and limb deficiencies.

**Emergency powers are needed to impose a moratorium on building new and expanding existing CAFOs**

Under the circumstances, it is time to impose a moratorium on building new and expanding existing CAFOs.

**Conclusion**

The measures identified above are commonsense solutions to dealing with the pending crisis that looms if we do not seriously handle the oversupply of CAFO animals and the inability of the meat processing industry in the state to handle the supply during the COVID-19 pandemic.

Sierra Club members reside in all 99 counties in Iowa. We are concerned with protection of water quality and air quality. The Iowa Chapter has been working on these issues since the 1970’s.

Sincerely,

Pam Mackey Taylor
Director
Iowa Chapter of the Sierra Club