

**CITIZEN ADVISORY COMMITTEE for the
GENERIC ENVIRONMENTAL IMPACT
STATEMENT (GEIS) on ANIMAL AGRICULTURE
Meeting Notes
Dec. 12, 2000
Holiday Inn, Arden Hills**

CAC members or alternates in attendance: Gary Allen, Ken Albrecht, Pat Bloomgren, Fraser Hart, Chris Lucke, Andy Steensma, Pat Henderson, Paul Burns, Chris Radatz, Tim Tracy, David Preisler, Tom Dunnwald, Galen Lisell, Troy Gilchrist, George Raab, Helen Palmer, Jim Ische and Larry Schultz

CAC members not represented: Kristin Sigford, Roger Gilland, Mark Schultz, Myron Just, Tina Rosenstein and Ed Heglund,

EQB staff present: George Johnson, Gregg Downing and Angela McGovern

Facilitator: Virginia Pierce, Management Analysis Division

Guests: Paul Toren, EQB Boardmember, Matt Drewitz, MDA, Kathy Norlein, MDH

The meeting came to order at 9:30 a.m.

Welcome, overview, and introductions

The meeting opened with remarks by George Johnson. He updated the CAC on the progress on the Technical Workpapers (TWP's).

Kirk Smith from the Minnesota Department of Health (MDH) gave a presentation on their role in Animal Agriculture. He focused on the issue of antibiotic resistance in farm animals and outbreaks of microbiological agents through food products. Mr. Smith's presentation was supported by a large number of charts and graphs. A largely narrative paper covering the same topic is included with your packet this month. Mr. Smith's presentation seemed to indicate that the issue of microbial resistance to antibiotics was a very serious concern. He presented a number of recommendations set forth by the World Health Organization for combatting this problem. These included: requiring prescriptions for use of antibiotics in farm animals, using antibiotics in animals at therapeutic doses only to treat infection not at low doses to promote weight gain, and to reserve certain antibiotics just for the treatment of infections in humans. Mr. Smith also answered a number of related questions from the CAC.

The main topic for discussion at this meeting was the draft TWP on Human Health by EarthTech. Mr. Valentine, Ms. Clark and Mr. Russell from Earthtech made a joint presentation on the draft document. The general sense was that the document was very

well done, although CAC did comment on the overall tone and emphasis placed on certain areas.

Following the EarthTech presentation there were a number of comments and questions from the CAC. The accompanying material was provided by Virginia Pierce, who facilitated the meeting and transcribed as many of the CAC comments as possible.

The document submitted by Earthtech will be revised and presented at the January 2001 meeting along with the draft TWP on Air Quality and the draft TWP on Animal Welfare. The January meeting is expected to be a two-day event dealing primarily with the three issues areas. Michael Valentine of EarthTech and his staff and Marlene Halvorsen will present their work, answer questions and take comments for document finalization.

4:15 Summary

4:30 Meeting Adjourned

Human Health (TWP) comments – as recorded by Virginia Pierce

CAC comments on the EarthTech TWP presentation

1. The TWP sounds conclusive—it sets a tone that we don't need to worry about human health—tone is important
2. We have few public health issues; our policies should at least maintain the quality we have now
3. We need to articulate two levels:
 - Where commitment of resources is needed to provide knowledge and technology for things such as manure management and implementation of rules
 - Policy level action about things that cause public concern such as antibiotics and mad cow; we can recommend that the Federal government require that antibiotics used for humans are not used in animals
4. Save a certain class of antibiotics for human use
5. GEIS needs to communicate the importance of ongoing work; we need to make strong recommendations and not assume that best management practices will take care of the problem
6. Include a plan for implementation and enforcement
7. Keep in mind what is and is not policy; we need a multi-purpose policy
8. We need to say what is and what we are not sure about

9. There are problem wells in Roseau; Minnesota has no systematic sampling of private wells; lenders may require testing; the dairy industry checks wells twice a year
10. Include more material on European antibiotic bans
11. The TWP seems to conclude that rules are in place to handle human health problems. How was this arrived at? There are a number of areas where additional information is needed. Solutions may involve more than enforcement, for example, education and flexible incentives.
12. Regarding the law of diminishing returns, or cost effectiveness, with investment in the environment, the group needs to come to grips with widespread impact vs. individual impact.
13. Consider conversations with physicians and public health nurses about what human health impacts they are seeing out there
14. Recommend that all antibiotics be sold by prescription only
15. Require information from the pharmaceutical industry about the extent of antibiotic use
16. State recommendations more strongly in the TWP; evaluate how important different aspects of human health are.
17. Have groups been identified that have developed examples of best management practices?
18. We don't know the human health risks where studies have not been done. Also, has there been consideration of bias in studies depending upon where the funding came from?
19. We must look at cost benefits. We can't possibly anticipate all future problems. We need to frame the questions and fund the research that is needed.
20. Regarding deaths on farms from manure pits, there is no connection with the size of the farm. It should not be implied that it is a large operation problem.
21. Clarify that animal units are defined differently in different countries.
22. Do municipal sewage plants remove endocrine disrupters? (No, they move into the water supply.) The issue of pharmaceuticals in surface and groundwater is becoming a major issue. The long term effects of these chemicals is unknown and likely to be detrimental to the environmental balance.

23. We need to look at where Minnesota needs to be placed in the world market and then how aggressively Minnesota should regulate. Also, consider what can be done at the state level and what needs to be done at the federal level.
24. Have a policy about importation of food from other countries
25. Is there any research on the impact per animal unit for large and small operations or for different species? I'm not suggesting that there are no issues with small operations.
26. We could have a recommendation regarding teaching best management practices.
27. Address the issue of feeding animals to animals and alternative types of agriculture
28. Are we suggesting that Minnesota is too regulatory? Have you looked at other states that are forward looking and have moved to address issues?
29. Is Stearns County the only one with a pollution prevention plan? Are delegated counties supervised by the MPCA, as they should? We could make a recommendation about MPCA implementation.
30. The diagram from large to small industry or agriculture is misleading in terms of what we are trying to do.

Policy recommendations

The group did a brainstorm of policy ideas and organized them into common themes. The group asked staff to develop recommendations for the group to review at the next meeting. An outline of the ideas follows.

A. Antibiotics

1. Certain antibiotics for humans only
2. Require drug companies to provide information on drug use in the animal agriculture industry
3. Require pharmaceutical industry to provide information on antimicrobials for human health research
4. Limit use of antimicrobials as growth promoters
5. Develop policy to limit use of antimicrobials as growth promoters if antimicrobial has potential human resistance.

6. Establish antimicrobial drug regulatory framework
7. Antimicrobial resistance, page 39 of Human Health; establish regulatory framework to address the needs for antimicrobial drugs in agriculture while ensuring that such use does not pose a risk to human health
8. No fluoroquinolones for poultry use
9. Withdraw fluoroquinolones use for poultry
10. Enforcement of antibiotic use in animals
11. All antibiotics sold by prescription only
12. Require all antibiotics to be sold only by prescription; farmers notable to procure off the shelf
13. Implement the five recommendations on page 39 of the TWP

B. Funding

Regulation

1. Necessity of adequate funding for enforcement of regulations
2. Funding for Minnesota Pollution Control Agency (MPCA) and counties for enforcement
3. Sufficient resources must be made available for permitting and enforcement by MPCA and delegated counties
4. Fund implementation of new rules (including private manure applicators, permitting, monitoring, technical assistance, and enforcement)
5. Enforcement of existing rules for air, water, and land

Compliance

1. Budget for producer compliance
2. Cost sharing for producer compliance with manure management and environmental regulations
3. More cost-sharing or low interest loans for remediation of environmental problems for producers

4. Budget to stimulate behavior

A. Research

1. Budget for all recommended future research without regard for priority
2. State budget for research
3. Move state funding of research
4. Support research on endocrine disruptors; efficacy of BMPs for NO₃ = reduction; antimicrobial resistance

B. Nitrates

1. Identify county nutrient flows
2. Identify and report nutrient flows consistent with annual manure production in counties
3. Require farmers to test water in tile lines for hormones, nitrogen phosphates, bacteria, antibiotics
4. Total nutrient balance for animal agriculture production systems
5. Total nutrient balance (air, water, and soil) for animal production systems to identify major emission sources
6. Free water testing, mandatory reports; mandatory follow-up
7. Policy – guarantee of safe drinking water, free testing, and mandatory reporting of results
8. Need to look at all sources of nitrates to get perspective
9. All farmers required to file manure management plans
10. Manure testing and manure management plans required of farmers

C. Consistent standards

1. Treat everyone the same regardless of size
2. Impact per animal unit should be considered

3. Apply rules to all farms
4. Set standards for all levels of agriculture operations

D. Irradiate

1. Irradiate meat
2. All meat products shall be radiated before being put on the market

E. Feed

1. Require farmers to keep feed records
2. Farmers keep written records of all feeds (labels) fed to market animals
3. Legislation to provide a paper trail to prevent cross-contamination of feed and provide inspection of feed

F. Response

1. Build on what we have – HAACP – response to E. coli – no BSE in U.S.A.
2. Quick state response team for disease, education, and solutions
3. Funding to farmers for dead diseased animals to control outbreaks

G. Considerations in policy setting

1. Minnesota feedlot rules are well advanced compared to the rest of the country
2. Willingness to study critical issues
3. The state make a commitment to conduct further research on critical human health topics where more information is needed
4. Policy recommendations should lead to desired goals
5. Consider human health when setting policy
6. Human health impacts of animal feeding operations, regardless of size, should be considered when making policy and regulatory decisions regarding animal agriculture
7. Be sensitive to consumer concerns without resorting to scare tactics

8. Remember that we are not a country

**Facilitated by the Management Analysis Division
Minnesota Department of Administration
Virginia Pierce, facilitator**