



July 29, 2022

Via Email

NPDES and State Permits Section
Nebraska Department of Environment and Energy
P.O. Box 98922
Lincoln NE 68509-8922

Comments Regarding Draft CAFO General Permit (NEGo23000)

Dear NDEE:

Enclosed please find comments from the 501(c)(3) organization the Socially Responsible Agriculture Project (SRAP) regarding Nebraska's CAFO Draft General Permit (NEGo23000).

We have limited our focus on three issues: truck wash water; factory farm gas; and some concerns with the scope and wording of the permit terms and conditions. We also request a public hearing.

I. Truck Wash Water and the General Permit

NDEE needs to explain its approach to the truck wash water issue in the Draft Permit. Because general permits are only appropriate for particular categories of activities, we ask NDEE to provide information on its due diligence conducted to identify pollutants and craft operation management concerns and enforcement approaches for truck wash water in the Draft Permit. As proposed, we believe it is inappropriate to include "truck wash water" in a statewide general permit intended to regulate CAFOs. Other states that do include truck wash water in their CAFO general permits do so with significantly greater regulatory requirements and oversight, and have developed entire programs to monitor and control truck wash water pollution. The state of Iowa, for example, has an

entire program within its CAFO program to regulate truck wash water at CAFOs.¹ We request that NDEE remove this category of truck wash water entirely from the CAFO general permit, and that NDEE require a separate NPDES permit for truck wash water. Some of our points at issue on this topic are outlined below.

First, can NDEE identify the legal authority it is relying on for its position that a CAFO general permit can cover truck wash water?

Second, can NDEE identify and clarify the purpose(s) and rationale for proposing to address truck wash water as part of the CAFO general permit? NDEE defines “truck wash water” as being part of process wastewater (Part V (38)), but we would like further explanation for how NDEE correlates its definition with the 40 C.F.R. § 122.2 definition of process wastewater, and with Neb. Admin. Code 130-1-141, neither of which include truck wash water in the “process wastewater” definitions.

Third, what is the basis for NDEE’s approach to truck wash water in the CAFO general permit? How many truck wash facilities has NDEE considered in creating its approach? Were they commercial operations? Did they involve manure, or did they involve other substances?

Fourth, what biosecurity and decontamination measures will NDEE require when adding truck wash water to minimize potential sanitation problems?² Has NDEE considered how necessary biosecurity and decontamination measures themselves can, or cannot fit within a state CAFO permit? What about wet and dry components of the cleaning process? Shouldn’t in fact an air permit be required for some biosecurity and decontamination measures?

Fifth, the draft CAFO general permit does not include monitoring or accountability related to truck wash water pollutants and chemicals. NDEE refers generally to “trace amounts normally found in process wastewater, such as spent foot bath water and truck wash water.” Part III (D). But how does NDEE, or the permittee, know what are “trace amounts” and what is “normally found”? The CAFO permit does not identify chemicals or pollutants, provides no effluent limitations or parameters for these pollutants or chemicals, and no obligation for permittees to sample truck wash water for identified pollutants and chemicals. For example, NDEE could easily identify effluent limitations for truck wash water chemicals, (e.g., aluminum, iron, TSS, TDS, pH, chloride, BOD, COD and concerning chemicals such as organic compounds (benzene, toluene, ethylbenzene, xylene). Nor does NDEE identify petroleum hydrocarbons or sulfate.

¹ See, e.g., Iowa DNR <https://www.iowadnr.gov/Environmental-Protection/Animal-Feeding-Operations/Animal-Truck-Wash-Facilities>

² See, e.g., <https://www.manitobacooperator.ca/livestock/livestock-truck-wash-facilities-to-be-upgraded/> and see <https://www.provisioneronline.com/articles/100574-ap-to-launch-enhanced-bio-dri-system-for-swine-virus-protection-during-transport> and see <https://www.nationalhogfarmer.com/facilities/hord-livestock-takes-biosecurity-seriously>

What about chemicals needed during certain periods, e.g., anti-freeze in cold weather? What about detergent and disinfectant chemicals? What about pollutants such as the tire rubber chemical 6PPD? Several of these pollutants and chemicals have the potential to contaminate soil and water, and are toxic and carcinogenic. The NMP Table A Recordkeeping Requirements only reference nitrogen and phosphorus content of process wastewater and of nitrogen for irrigation water (Part II (E)). Not only does NDEE not require monitoring or accountability on-site at the production area of these other pollutants and chemicals, but because NDEE allows truck wash water to be land applied, NDEE is allowing uncontrolled release of unidentified chemicals and pollutants into Nebraska's soils, potentially surface and groundwater, and air.

Sixth, what about the construction of truck wash areas on a CAFO site? Does that activity require a separate construction permit and land disturbance permit, or does NDEE allow construction of truck wash sites through a CAFO construction permit? What design requirements has NDEE established for truck wash areas (entrances, exits, flow, dirty/clean zones, etc.)? What setbacks will be required from neighboring properties, from waters of the state, for truck wash areas and truck wash water storage structures?

Seventh, what additional special procedures does NDEE require to address engineering design changes that are necessary to separate liquids from solids for truck wash wastewater?

Eighth, what about protocols for addressing spills or discharges of the truck wash water pollutants and chemicals?

Ninth, has NDEE looked at other states' permits and regulations in proposing the Nebraska permit approach? Which states?

Tenth, will truck washes be servicing only company-owned trucks? Otherwise, would they be considered commercial truck washes?

Lastly, will NDEE establish separate protocols for land application of truck wash wastewater as it has for domestic wastewater? How will it address solids versus liquids? And will it require soil sampling to monitor the pollutants and chemicals from truck wash water in the soil and potential leaching to surface and groundwater?

II. Factory Farm Gas and the General Permit

The draft CAFO general permit does not address factory farm gas (also referred to as "manure digesters", "anaerobic digesters", "manure to energy", "biogas", "biomethane"). When anaerobic digestion equipment is installed and used, organic material such as animal manure can be processed into a methane gas, which can then be used to produce electricity. However, the factory farm gas process does not reduce the quantity of manure animals produce, it is not a manure storage 'solution', every step of the factory farm gas production process increases pollution, and the hefty pricetag on obtaining and operating a factory farm gas system is outside the reach of most farmers.

The factory farm gas process produces methane gas, but the digested solid and liquid manure waste must still be disposed of afterwards. Some facilities use the leftover liquid manure and solid manure in farm management activities, e.g., land application, bedding, and compost. Digesters do not eliminate nitrogen and phosphorus loads in digested manure; on the contrary, according to NRCS they make nutrients in CAFO waste more soluble and therefore more susceptible to runoff to surface waters and leaching into groundwater.³ How can Nebraska CAFO permittees using digesters, or digested waste, control pollution from their CAFOs if the permit itself does not account for the difference in waste streams under their control at their operation? Other states have already acknowledged the problems manure digesters can pose at CAFOs, have incorporated provisions into their CAFO permits, and established entirely separate permits required for digester systems to prohibit unpermitted discharges from digesters. North Carolina, for example, has developed an entire suite of permits for cattle, dairy, swine, and (liquid waste) poultry operations. See North Carolina Department of Environmental Quality, 2022 Digester System General Permits at <https://deq.nc.gov/digesterpermits>. Other states, e.g., Michigan, are requiring CAFOs with anaerobic digesters to obtain individual permits and do not allow them to be covered under the CAFO general permit.⁴

For several reasons, factory farm gas should be regulated under Nebraska's CAFO general permit, and we request that Nebraska amend the draft CAFO general permit to regulate factory farm gas. Through SRAP's work with communities in Nebraska, we are aware of an increasing number of operations (including cattle operations) that are considering factory farm gas. SRAP is also aware that for factory farm gas production to be economically viable, most farmers and CAFO operators need to increase their herd size for the sole purpose of producing more manure to pay for a fancy piece of equipment; this does not correlate to traditional reasons a farmer may elect to change herd size (e.g., agricultural market changes or animal husbandry concerns). Failure of NDEE to regulate factory farm gas is to allow a regulated activity to occur without a permit; this NPDES CAFO general permit is an opportunity for NDEE to close this loophole.

Without NDEE's specific and thorough consideration of the problem, CAFOs using digesters or applying digested waste cannot be permitted by this CAFO General Permit because digester and digested waste use entails unique effluent streams and pollution risks. The CAFO general permit needs to include much stronger and digester-specific requirements to protect Nebraska's waters waters if NDEE is to permit, under the CAFO general permit, what are essentially industrial wastewater processing facilities, or gas

³ See NRCS, 366-CPS-1, Conservation Practice Standard No. 366: Anaerobic Digester, at page 6 (Oct. 2017) ("Land application of digester effluent, compared with fresh manure, may have a higher risk for both ground and surface water quality problems. Compounds such as nitrogen, phosphorus, and other elements become more soluble due to anaerobic digestion and therefore have higher potential to move with water.").

⁴ See, e.g., Michigan Dept. of Env. Quality, Great Lakes, and Energy, "Anaerobic Digesters - FAQa" <https://www.michigan.gov/egle/-/media/Project/Websites/egle/Documents/Programs/WRD/CAFO/Anaerobic-Digesters-Part31-CAFO-NPDES-Permit.pdf?rev=03a34efcc2c447a8bfd2f7b26daec36a&hash=90444FE54266B262E5F2F5389A6B7CDD>

production facilities, or waste treatment plants, or some other “treatment system”... but certainly not CAFOs as contemplated by the CAFO general permit.

For example, Nebraska CAFO general permit permittees must follow nutrient management plan requirements for land applications and stockpiling of digestate waste. Nebraska’s definition of “agronomic rates” requires permittees to “tak[] into account other sources of nutrients.” Neb. Admin. Code 130-1-001. This means digestate waste must, like other sources of waste, be monitored, stored, handled like other kinds of waste. Research suggests that factory farm gas digestate waste is higher in certain constituents, increasing risks to surface and groundwater pollution impacts when land applied, or if a discharge occurs. Leftover liquid and solid manure from anaerobic digestate processes should be addressed in permittees’ waste management plans.

Additionally, just as feed influences the kind and nature of manure available for land application at a CAFO, and how and when it can be land applied, the feed given to cattle influences the kind of manure available for use in an anaerobic digester. Are CAFO operators to feed their cattle with Clean Water Act land application requirements in mind, or the economic efficiency of their expensive manure digester? And, creating the proper consistency of digestate waste may require even more water be added to the gas production process; in parts of Nebraska that are experiencing a multi-year drought, the use of water for this factory farm gas production process should be addressed through regulatory oversight and reporting mechanisms available to the NDEE through the CAFO general permit system. We encourage NDEE to use this CAFO general permit as an opportunity to keep permittees’ focus on water protection by bringing anaerobic digestate waste into the fold of the CAFO general permit.

Because the factory farm gas equipment is managing and treating CAFO waste, the operation, maintenance, engineering, and training requirements for CAFO production area equipment in the CAFO general permit should apply to any facilities with factory farm gas anaerobic digestion equipment. Digesters require a very high level of engineering management and oversight, they are extremely sensitive to environmental changes, and biological problems can take months to correct.⁵ Digesters are not merely another piece of CAFO equipment. These facilities require high standards for construction, maintenance, operation, and technical staff training beyond those applicable to any other CAFO waste management facilities.⁶

Once a methane gas is produced, significant additional problems arise as methane gas is difficult to store, requires special equipment to be compressed, and can be explosive if exposed to air.⁷ And, transportation or conveyance of the manure to the digester, and of

⁵ Jones, D. et al. “Methane Generation From Livestock Waste.” *Energy Management in Agriculture*, Purdue University Dept. of Agricultural Engineering Cooperative Extension Service, <https://www.extension.purdue.edu/extmedia/AE/AE-105.html>

⁶ See, e.g., See *Agricultural Anaerobic Digesters: Design and Operation*, PennState Extension (Dec. 1, 2016), <https://extension.psu.edu/agricultural-anaerobic-digesters-design-and-operation> (listing disadvantages of digesters including: complex equipment, the need for strict explosion-proof standards, precise temperature controls, and high standards of maintenance and management required); 40 C.F.R. § 412.4.

⁷ *Id.*

methane gas to other points, are all point sources at risk of structural failures that can cause discharges, leaks, and spills. For example, earlier this year, a brand new cattle digester in Iowa leaked 376,000 gallons of manure mixed with water directly into the ground over the course of three weeks.⁸ Operators noticed the liquid levels dropped in the digester, but did not investigate, and continued to add waste to the digester. Eventually someone saw manure flowing into a nearby creek. Other examples include:

- * In 2008, a large dairy in Wisconsin promised the community that “a manure digester would keep their neighborhood footprint small. However, a decade later, the groundwater is contaminated with nitrates. A lawsuit was filed and the Wisconsin dairy has had to supply the community with bottled water.⁹
- * In 2016, a digester spilled in the United Kingdom, causing the deaths of livestock and wildlife for miles around.¹⁰
- * In 2014, a manure digester near Waunakee, Wisconsin malfunctioned, causing a gas explosion and fire. Subsequent disclosures exposed a string of challenges at the facility.¹¹
- * In early 2019, a Michigan prized trout stream turned “ink black” after at least 10,000 gallons of digested waste were applied on snow-covered and frozen ground.¹²
- * In July 2019, a manure digester tank in Tillamook, Oregon spilled 300,000 gallons of waste into Anderson Creek, a tributary of the Tillamook River.¹³

⁸ See, e.g., Strong, J. “Company Filled Massive Manure Container Despite Signs of A Leak, DNR Says.” *Iowa Capital Dispatch* (July 6, 2022), <https://iowacapitaldispatch.com/2022/07/06/company-filled-massive-manure-container-despite-signs-of-a-leak-dnr-says/> (Notably, this CAFO had 2,400 head but needed to find access to another 17,600 cows’ manure to even make the digester an option).

⁹ See, e.g., Madden, K., “Juneau County Lawsuit: Dairy Companies Knew They Were Contaminating Groundwater, Wells,” *Wisconsin Rapids Daily Tribune* (Jan. 7, 2019), <https://www.wisconsinrapidstribune.com/story/news/2019/01/07/nitrate-pollution-juneau-county-residents-sue-central-sands-wysocki/2435677002/>

¹⁰ Rose, D. “The Great Green Guzzler.” *Daily Mail* (Dec. 31, 2016) <https://www.dailymail.co.uk/news/article-4078820/The-great-green-guzzler-Monster-digesters-meant-guzzle-wastechurn-eco-friendly-energy-fed-CROPS-produce-pitiful-levels-power-cost-216m-subsidies-HARMenvironment.html>

¹¹ Verburg, S. “Blast Destroys Roof of Troubled Biogdigester Near Waunakee.” *Wisc. State J.* (Aug. 6, 2014), https://madison.com/news/local/environment/blast-destroys-roof-of-troubled-biogdigester-near-waunakee/article_4e5a7c0a-3a39-5b90-a225-b99dabfd37d1.html

¹² Kransz, M. “Manure Spill Turns Portions of West Michigan Trout Stream ‘Ink Black’,” *MLive* (Mar. 21, 2019), <https://www.mlive.com/news/grand-rapids/2019/03/manure-spill-turns-portions-of-west-michigan-trout-stream-ink-black.html>

¹³ Dixon Kavanaugh, S, Manure Spill Splashes 300,000 Gallons Near Tillamook Bay, *Oregonian* (July 23, 2019), <https://www.oregonlive.com/news/2019/07/manure-spill-splashes-300000-gallons-near-tillamook-bay.html>

All of these consequences of the factory farm gas production process must be regulated, and the CAFO general permit is at a minimum the ground-level place to begin to manage the use of CAFO waste in this manner.

As a final point on this issue, factory farm gas is also characterized as a “biogas” or a “clean” or “renewable” source of energy. None of these terms mean that production processes to create this energy have low emissions, that the processes themselves are “clean” or “green”, or that there are minimal to no emissions, air quality concerns, greenhouse gas, or climate concerns related to the production and use of this energy.¹⁴ The process of producing and using factory farm gas emits the same greenhouse gasses as other fossil fuels, e.g., CO₂, NO_x, ammonia, hydrogen sulfide, and formaldehyde. While these can be regulated under air permitting frameworks, the on-site equipment and use of digestate leftovers is within the realm of Clean Water Act permitting, as is the aerial deposition of these air emissions into waters of the state.

To correct the gaps in oversight identified above, NDEE can use the CAFO general permit. Some of the examples above show that NDEE can establish a new permit system for anaerobic digesters, require individual permits for anaerobic digesters and digested waste user, and NDEE can simply prohibit the land application of digested CAFO waste as too risky. Alternatively, and at a minimum, the Nebraska CAFO general permit must clearly instruct CAFOs how to account for digested waste’s unique nutrient content before permitting land applications of this waste, and in nitrogen and phosphorus calculations—and require that they do so, along with other Permit reporting requirements. The Nebraska CAFO general permit must also require digester inspections and sampling (whether or not the waste is land applied) and require specific operational safety requirements to minimize the risks of accidents and spills. NDEE must additionally outline criteria and processes for digester siting, design, approval, and operation procedures. These, and any additional BMPs and effluent limitations, are necessary to protect Nebraska’s waters.

III. Permit Terms and Conditions Requiring Clarity

A. Overly Narrow Application of the Permit

The CAFO general permit says that it “does not authorize a discharge associated with a CAFO that would adversely affect a listed endangered or threatened species or its critical habitat.” Part I (3)(d). This provision is overly narrow, when the purpose and protections of the Clean Water Act and the Nebraska law is much broader than focusing just on endangered or threatened species or their critical habitat. The purpose of the CWA is to eliminate discharges of pollutants to navigable waters (33 U.S.C. § 1251(a)(1)), not just those waters that may be associated with endangered or threatened species or their critical habitat. And, the CWA’s standards and enforcement provisions relate not just to endangered or threatened species or their critical habitat, but to other important concerns, such as recreation, public health, and water quality overall. See,

¹⁴ See, e.g. “Anaerobic Digesters,” Vermont Department of Environmental Conservation, <https://dec.vermont.gov/air-quality/permits/source-categories/anaerobic-digesters>

e.g., 33 U.S.C. § 1312(a). Nebraska water protection statutes and regulations also have a broader scope than the language NDEE has proposed in the draft CAFO general permit. See, e.g., Neb. Rev. Stat. 81-1506(1) (“It shall be unlawful for any person... [t]o cause pollution of any air, waters, or land of the state...”); Neb. Rev. Stat. 81-1506(2) (“It shall be unlawful for any person... [t]o discharge or emit any wastes into air, waters, or land of the state which reduce the quality of such air, waters, or land below the air, water, or land quality standards”); Neb. Rev. Stat. 81-1508.02(1)(b) (“It shall be unlawful for any person ... [t]o violate any air, water, or land quality standards, any emission or effluent standards or limitations, any permit or license condition or limitation... or any monitoring, reporting, or record-keeping requirements”). We ask that Nebraska change the language in its CAFO general permit to reflect the proper, broader scope of the Clean Water Act and of Nebraska’s own Environmental Protection Act.

Additionally, the Draft Permit is contradictory and unclear on what types of animal feeding operations are covered. The public notice says this permit will apply to facilities that “[c]onfine cattle, either in open lots or under roof;”, while the permit specifically refers to “cattle concentrated animal feeding operations in open lots or in confinement buildings”. Still the permit also appears to incorporate other types of “large CAFOs”, stating, “*This general permit applies to point source discharges from Large CAFOs that are required to have a permit under Nebraska Administrative Code Title 130, “Livestock Waste Control Regulations.”*”

NDEE needs to clarify why this permit has only been narrowly applied to large cattle CAFOs when permit language references other types of facilities. The Department should also specifically incorporate language to cover small and medium AFOs that have been deemed “CAFOs” due to discharges, or likely potential to discharge as defined by Title 130.

B. Additional Points Where the Draft Permit Lacks Clarity

Regulatory references. Nebraska regulations contain significantly greater detail than the permit draft, requiring a great deal of cross-referencing and study by permittees and the public to fully understand requirements. For example, the draft permit makes vague references about practices such as vegetative buffers, stockpiling, and transferring waste without providing reference to guidance or regulation on how to best perform that practice. NDEE can remedy this by including direct references and links to pertinent regulations, statutes, and guidance in the permit.

Definitions. It is unclear if definitions used in the draft permit are incorporated from statute or regulation. For example, the draft includes several definitions from Title 130, but also excludes terms like “ground water” and “lagoon”. The draft also includes a definition for “truck wash water” that does not appear in Title 130. Please include citations for the origins of definitions used throughout the permit.

Compliance with other laws. NDEE should consider applicants' compliance with county and local ordinances, as well as other required NDEE permits, when evaluating overall permit compliance. This could be incorporated into Part I(A)(3)(c) of the permit.

Proper mortality management. Proper management of mortalities to prevent discharge, as required by Part II(A)(1)(f), should also be protective of groundwater, not only surface water.

Closure of operation and accountability. Does NDEE perform a site inspection to confirm that all waste has been properly removed? If not, this should be required and that should be part of this permit under Part III (E).

Duty to Comply. Part IV Standard Permit Requirements (A)(1) needs some clarification. The CAFO general permit is a Clean Water Act permit and also issued under Nebraska's Environmental Policy Act. Parts I, II, and III of the CAFO general permit cover several CWA points. But the "Duty to Comply" section in Part IV(A)(1) only references the state NEPA. Granted, Part IV does say in its opening paragraph that "[t]hese conditions shall not preempt more stringent requirements found in Parts I, II, and/or III of this permit", but the entire duty of a permittee to comply with the CAFO general permit is to comply with state and federal law. We suggest that NDEE clarify Part IV(A)(1) to make it clear that permittees have to comply with state and federal laws.

Reporting Requirements - Strengthen Annual Reporting Metrics. Transparency and accountability are critical to protecting Nebraska's waters from waste runoff and contamination. This draft permit leaves a large gap in that transparency, accountability, and protection by not requiring more information about waste transfers to other persons. NDEE can follow others states' examples to significantly improve the agency's, and the public's, oversight of CAFO waste in the draft permit by requiring:

- (1) Reporting of the actual destination of where the waste is used, in addition to the recipient of the waste. Without waste destination information, NDEE and the public are left to find out about abuses of waste application restrictions after they are violated.
- (2) CAFO permittees claiming land available for waste applications, even if they do not own the land, to provide written agreements verifying that they have the right to apply waste to that land.
- (3) End-users of CAFO waste to be subject to the agronomic and technology standards, have a NMP, follow manure export guidelines, and be subject to NDEE enforcement.
- (4) Soil sampling of receiving fields before exported waste can be applied to receiving fields.
- (5) Only a certified waste operator can apply CAFO-exported waste.
- (6) Electronic reporting requirements (consistent with EPA's electronic reporting rules).

- (7) That the information above is provided to NDEE in a timely fashion and is made publicly available.

Other elements that should be included as part of the annual report:

- (1) Part II(A)(1)(e) requires “*Records documenting any actions taken to correct deficiencies must be maintained.*” These corrections alert NDEE and the public to potential ongoing structural, process, or management failures, and should be reported in the annual report as part of the public record.
- (2) Land application recordkeeping and reporting requirements should include any discharge event and the corrective measures taken to resolve the issue; currently the permit only requires discharge records for the production area in Part II(E) and (G)(6).

Reporting Requirements - Discharge Reporting and Discharge Reporting Form. Part VIII (Attachment D) is the NDEE’s “Discharge Written Notification Form.” SRAP would like to suggest several improvements to update the discharge notification process and NDEE’s form, which we’ve identified that other states use. Many of the communities we work with across the U.S. have found these additions helpful to protect themselves from pollution from CAFOs.

Notice of Discharge:

- (1) require CAFOs to notify the regional office as soon as possible so the agency can investigate; not just within 24 hours;
- (2) any verbal notification to NDEE must be documented by NDEE;
- (3) notification by permittee to residents/neighboring property owners, drinking water source users, well heads, irrigation intakes, etc. within 24 hours of the discharge.

Add to Discharge Reporting Form:

- (1) a description of efforts made to stop the discharge and clean up the discharge;
- (2) location of discharge itself (not just of location of operation or address of permittee);
- (3) source of the discharge (e.g., lagoon, land application, digestate waste)
- (4) whether the waters are 303(d) listed or have endangered / threatened species, are recreational use protected, a drinking water source, etc.,
- (5) what changes Permittee made to its operations / equipment to ensure that this discharge was stopped and will not happen again and documentation to support those changes.

IV. Request for a Public Hearing

SRAP, alongside members of the public hoping to better understand the NDEE permitting procedure and provide beneficial input, requests a public hearing with Department staff on this NPDES General Permit. We believe a forum for open communication and transparency will contribute greatly to the public's ability to participate in this important regulatory process.

V. Conclusion

Thank you again for the opportunity to provide public comment, and for responding to our comments. We look forward to NDEE's additional General Permit revisions which we sincerely hope will incorporate the much-needed protections SRAP, and other community members, are advocating for in Nebraska.

Sincerely,

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