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Dairy Air Emissions/CAFOs Environmental Organizations Petition Oregon Environmental Quality Commission to Promulgate Rule Requiring Quantification/Regulation

08/25/2022

Food and Water Watch and 21 other environmental organizations (collectively, "FWW") filed an August 17th document with the Oregon Environmental Quality Commission ("EQC") titled:

Petition to Adopt a Dairy Emissions Program to Quantify and Regulate Large Dairy CAFO Air Emissions ("Petition")

The organizations joining the *Petition* include:

- 350 Eugene
- 350 Deschutes
- Animal Legal Defense Fund
- American Society for the Prevention of Cruelty to Animals (ASPCA)
- Farm Forward
- Farm Sanctuary
- Friends of the Columbia Gorge
- Beyond Toxics
- Center for Biological Diversity
- Center for Food Safety
- Columbia Riverkeeper
- Comunidades Amplifying Voices for Environmental and Social Justice
- Friends of Family Farmers
- Mercy for Animals
- Northwest Environmental Defense Center
- Oregon Physicians for Social Responsibility
- Pendleton Community Action Alliance
- Environment Oregon
- Humane Voters Oregon
- Public Justice Foundation
- World Animal Protection

The *Petition* requests that EQC require the Oregon Department of Environmental Quality (“DEQ”) to address air emissions from what are described as large dairy concentrated animal feeding operations (“CAFOs”).

FWW argues that a dairy emissions program should be adopted to quantify and regulate CAFOs because DEQ is stated to neither monitor nor regulate such emissions through its Air Contaminant Discharge Permit program.

FWW’s *Petition* includes the following factual arguments in support of its *Petition*:

- Failing to Immediately Regulate Dairy CAFO Air Emissions Threatens Public Health
- Failing to Immediately Regulate Dairy CAFO Air Emissions Exacerbates Environmental Injustices Across the State
- Failing to Immediately Regulate Dairy CAFO Air Emissions Poses a Direct and Serious Threat to Oregon’s Environment
- Failing to Immediately Regulate Dairy CAFO Air Emissions Exacerbates Inhumane Living Conditions for Farmed Animals
- Failing to Immediately Regulate Dairy CAFO Air Emissions Jeopardizes the Economic Livelihoods of Oregon’s Few Remaining Small and Mid-sized Dairy Farms

Legal arguments outlined in the *Petition* include:

- EQC Has Broad Authority to Regulate State Air Quality
- EQC Has Express Authority to Adopt Air Quality Rules Applicable to Agricultural Sources

EQC has 90 days to formally respond to the *Petition* by either denying FWW’s request or initiating rulemaking proceedings.

A copy of the *Petition*, which also includes the proposed rule language, can be downloaded [here](#).