

JFAN 2023 Activities and Achievements

Organized “The Farm Bill and Factory Farms: Could the Farm Bill Be Encouraging CAFO Growth Near You?”

- April’s Zoom webinar was developed to bring awareness to the 2023 Farm Bill negotiations and the ways the bill promotes industrial agriculture.
- Speakers Joe Maxwell, President of Farm Action, and Aaron Lehman, President of the Iowa Farmers Union, made brief presentations, participated in a panel discussion moderated by Diane Rosenberg, and answered audience questions.
- Over 100 people attended the webinar, and the [recording](#) posted on JFAN’s YouTube channel reached an additional 260+ people.

Organized the JFAN Annual Meeting “Bigger Is Not Better: Rural Communities in the Wake of Livestock Production”

- Art Cullen, Pulitzer Prize-winning editor of the Storm Lake Times; Dr. Chris Jones, water quality expert and author of The Swine Republic; Chris Petersen, independent hog farmer; and Sonja Eayrs; family farmer and rural advocate on how the growth of industrial livestock production impacted rural communities.
- Webinar meeting format began with brief presentations, followed by audience questions moderated by Diane Rosenberg.
- Over 230 people attended the Zoom meeting and over 560 have viewed the [recording](#) on JFAN’s YouTube Channel.

Ongoing Participation in DNR’s Rules Review of Chapter 65 of CAFO Regulations

- Co-lead an effort with the Iowa Environmental Council (IEC) to advocate for stronger CAFO regulations during the DNR’s Five-Year Rules Review. DNR started the process in Summer 2022 and have opened three public comment sessions since then.
- Recruited and work with a coalition of approximately 15 environmental groups to comment on the rules.
- JFAN and IEC are major players digging deeply into the regulations, complementing each other’s areas of expertise and focus.
- Coauthored an op-ed with IEC on our recommendations to improve CAFO rules and regulations that appeared in [The Gazette](#) and [Clear Lake Mirror Reporter](#).
- Co-organized and actively participated with the IEC and other coalition members in at least three meetings with the Iowa DNR (one in 2022 and two in 2023) and one with the Governor’s Office (July 2023) to advocate for stronger regulations.
- Submitted detailed written comments of Chapter 65 draft revisions during each of three comment periods. You can read them here: [October 2022](#), [June 16, 2023](#), [September 26, 2023](#). *(Note – there was an extra comment period due to the changes required by Executive Order Number 10. See the next section.)*
- Sent out several action alerts to JFAN supporters encouraging their comments. You can read them [here](#), [here](#), [here](#), and [here](#). Many JFAN supporters reported they sent comments to the DNR.
- Made a strong case for closing the LLC loophole (see next point) and strengthening the DNR’s draft Regulatory Analysis (see Executive Order Number 10 below).
- Continue to strongly advocate for effectively closing the LLC loophole completely.
 - Spoke to several attorneys and Iowa Secretary of State’s office to determine specific documents to prove CAFO owners’ claims they don’t commonly own adjacent

CAFOs. (The DNR only requires a letter from the CAFO owners. It's not a legal document and doesn't prove anything.)

- Recently learned from a local business attorney that an Operating Agreement is developed when an LLC is formed and contains the percentage of ownership of LLC principals.
- Strongly urged the DNR to require an LLC's Operating Agreement to be submitted when common ownership is suspected.
- JFAN's comments include [specific examples](#) of 11 cases involving 24 confinements in Jefferson, Washington and Howard Counties where common ownership was either suspected or eventually proven. Twenty of those confinements are in Jefferson County, a full 25% of all the county's CAFOs, countering DNR's doubts about its frequent occurrence.

Note: The three comment periods to date are part of a pre-formal public comment period. The final, formal public comment period will be held in early 2024. In past DNR Five-Year Rules Reviews, environmental organizations were excluded from participating during the pre-formal stage although industry groups were quietly involved.

JFAN discovered this exclusion in 2016, called it out publicly during a DNR public hearing in Des Moines, and followed that with letters to the editor published in the [Des Moines Register](#) and the [Fairfield Ledger](#) (now the Southeast Iowa Union). Other groups joined in voicing dissatisfaction. JFAN and the IEC lobbied over the last several years to be included in this early process. This time around the pre-formal comment period become inclusive and transparent.

Executive Order Number Ten (EO10):

- Sounded the alarm on an [executive order](#) issued by Governor Kim Reynolds in January 2023 designed to reduce the number and severity of state regulations, and recognized its potential to seriously weaken CAFO regulations and enforcement. EO10 temporarily stopped the review of Chapter 65 from moving forward in order for the DNR to rework the Chapter 65 draft to comply with EO10 guidelines.
- Wrote three articles on EO10 and its impact on CAFO regulations for the JFAN website. There was a concerning lack of coverage of this issue in state and local media, so we pitched the articles to [The Bleeding Heartland](#) who published the articles. You can read them [here](#), [here](#), and [here](#).
- Voiced many concerns to the DNR over the course of the year on the impact of how EO10 could weaken CAFO regulations and enforcement and how it reduces the usability of the chapter itself.
- Focused significant attention on the required [Regulatory Analysis](#), which accompanies the draft of the chapter, that provides a cost/benefit analysis of CAFO regulations.
- Worked with the Iowa Environmental Council to include statistics demonstrating the value of CAFO rules on public health, water quality, and Iowa tourism for the cost/benefit analysis in the Regulatory Analysis. However, the DNR omitted these figures, although they included detailed figures on the cost of CAFO operator compliance with regulations.
- Strongly advocated for the DNR to include these statistics in our last set of public comments and during the September 26 public hearing.

The Swine Republic Book Launch

- Co-sponsored the initial launch of Dr. Chris Jones' book with the Southeast Iowa Sierra Club held May 16 at the Fairfield Public Library.

- Developed a strong publicity campaign that drew 80 people, far exceeding the expectations of Dr. Jones' and his publisher, Ice Cube Press, on turnout.
- Posted the [recording](#) of Dr. Jones' talk on the JFAN YouTube channel and boosted the recording several times on Facebook. To date, the recording has over 500 views.
- Co-organized a follow-up book club meeting with the Southeast Iowa Sierra Club on *The Swine Republic* featuring Dr. Jones that drew approximately 25 participants and was livestreamed on Facebook.
- Invited Dr. Jones to join the JFAN board. He is now a member.

“Real Farms or Factory Farms? What You Need to Know about CAFOs”

- Gave a 90-minute presentation in July to Iowa Farmers Union members providing CAFO basics as a prelude to a training program JFAN is holding for IFU members beginning in January 2024.
- Approximately 80 people attended, and the [recording](#) was posted on the IFU Facebook page.
- Collaborating with the Iowa Farmers Union to bring their members JFAN's full training program on how to protect their communities and develop organizations like JFAN.
- Updating and developing JFAN's current day-long program into five 90-minute sessions held every two weeks beginning in January. Updating the 300-page training manual.

The EATS Act

- Began educating JFAN supporters on the EATS Act, a federal bill introduced to negate California Proposition 12 that could also nullify over 1100 state and local laws impacting food safety and farmers' livelihoods. The bill may become part of the 2023 Farm Bill or stand on its own.
- Joined the Defeat EATS Act coalition comprised of over 120 members and attend coalition meetings designed to bring public attention and expand opposition to this dangerous bill.
- Published a [letter to the editor](#) in the *Southeast Iowa Union* and plan to submit this op-ed to other state newspapers.
- Sent JFAN supporters an [Action Alert](#) encouraging them to sign a petition on the EATS Act and to prepare them for further action as the bill progresses.
- Instructed JFAN fundraiser, when appropriate, to educate people about the EATS Act when she makes her fundraising calls.

Presentation to Jefferson County Board of Supervisors Regarding a CAFO Moratorium Resolution

- Pursued a moratorium resolution over the last year with Supervisor Susie Drish and she eventually agreed to JFAN making a presentation to the board of supervisors last winter.
- Provided a full presentation during a board of supervisors meeting on the impact of CAFOs, why we need a statewide moratorium, and advocated for the supervisors to adopt a county resolution in support of a moratorium
- Publicized the presentation to JFAN supporters, drawing about a dozen attendees to the early morning meeting.
- Supervisor Drish agreed to follow up with a public hearing to further discuss a possibility resolution; date to be determined.
- A recording of the presentation has been broadcast numerous times on the radio station KHOE-FM.

JFAN E-News: Farms Not Factories

- Produce a digital newsletter featuring a variety of articles and videos on CAFO-related news and issues.
- Typically write a feature article to lead the newsletter, posted to the JFAN website page and Facebook page.

Publicized and Supported the Southeast Iowa Sierra Club's Earth Day Event in April

- Tabled a booth at the event promoting JFAN's activities

Iowa Alliance for Responsible Agriculture

- Executive Director Diane Rosenberg returned to the IARA Steering Committee as Chair, helping to lead the coalition to advocate for a CAFO moratorium and new legislation to protect water quality.

CAFO Monitoring and Neighborhood Alerts

- Monitored for new CAFO development twice a week. Alerted residents within a two-mile radius of new or expanding CAFOs with letters, maps, informational materials, and offers of support if desired.
- Alerted neighbors of the following CAFO activity:
 - Shifting Gears South, a 1200-head CAFO in Polk Township right across Grinding Gears LLC and Shifting Gears LLC, two adjacent 1200-head confinements owned by family members under separate LLC names.
 - Alerted the DNR about common ownership with Shifting Gears LLC and the possibility that it may be an expansion, not an individual CAFO.
 - DNR investigated but found that Shifting Gears South was sited far enough away to be considered an independent operation.
 - Guy Farm, 1200-head confinement owned by Ryan Robertson and Pleasant Plain 12, another 1200 head confinement owned by Justin Deutsch in Penn Township, east of the city of Pleasant Plain. These CAFOs are adjacent.
 - Alerted DNR about the business relationship between Robertson and Justin Deutsch's father, Robert, as we suspected common ownership and asked the DNR to investigate.
 - The DNR can only ask for a simple letter stating ownership in each confinement. Upon receiving letters that common ownership wasn't involved, DNR allowed the CAFOs to be built as independent confinements.
 - Because a simple letter proves nothing, we made the LLC loophole a major focal point in our Chapter 65 Rules Review public comments.
 - One neighbor contacted JFAN, but he didn't pursue any follow-up action.
 - Two as yet unnamed adjacent CAFOs also in Penn Township owned by siblings Justin Deutsch and Jennifer Deutsch.
 - We again raised the potential common ownership/LLC loophole issue with the DNR and underscored our concerns with historical context that these confinements may be commonly owned by Robert Deutsch.
 - The DNR held off investigation as the CAFOs are postponed until 2024, likely because of California Proposition 12 uncertainty.