



525 East Cotati Avenue  
Cotati, California 94931

T 707.795.2533  
F 707.795.7280

info@aldf.org  
aldf.org

March 2, 2023

Oregon State Senate  
Committee on Natural Resources  
900 Court St. NE  
Salem, Oregon 97301

**RE: SB 85-1 (Senate Committee on Natural Resources) CAFO Moratorium — SUPPORT**

Dear Chair Golden, Vice Chair Girod, and Members of the Committee:

The Animal Legal Defense Fund, a national animal protection nonprofit with thousands of supporters in Oregon and a member of the Stand Up to Factory Farms coalition, writes to express support for SB 85-1. This bill would create a moratorium on the construction of new industrial confined animal feeding operations (CAFOs), as well as the expansion of existing industrial confined animal feeding operations – defined by the Oregon Department of Environmental Quality and Department of Agriculture. The moratorium would be in effect until 2031 while the State studies and addresses, through passage of additional statutes and rules, the impacts of industrial confined animal feeding operations on the public interest, including air quality, climate, water quality, water supplies, small- and medium-sized livestock farms, and animal welfare.

Modest attempts at improving oversight of industrial confined animal feeding operations have done little to mitigate their impacts. A moratorium is critical to prevent more of these operations from opening or expanding in Oregon while officials address existing problems. One of those problems is animal welfare.

An animal's life on an industrial confined animal feeding operation is far from the bucolic image that consumers desire. For example, cow's lives are nothing like the pastoral images of cows serenely grazing in fields that cover the packaging of dairy products sold in stores – virtually all of which are sourced from industrial confined animal feeding operations. Cruelty is built into the model of these large-scale feeding operations.

Instead of grazing on grass, a cow on an industrial confined animal feeding operation typically spends her entire life indoors in a huge concrete and metal building with thousands of other cows, only moving between cramped barns and milking parlors until her body prematurely gives out after only 25% of her natural lifespan and she is shipped to slaughter. The significant physical and emotional toll of constant pregnancy, lactation, and unnatural conditions is just too much. These feeding operations are designed to extract as much milk as possible from cows, without regard for the animals' well-being.

In some industrial confined feeding operations, chickens are forced to remain confined with their ammonia-filled litter which can lead to ulcerated feet, feather loss, blisters, tumors, and more. These chickens are bred to gain weight as fast as possible which can also cause suffering from debilitating leg disorders. For

**All our clients are innocent**

Printed on recycled paper

cows and chickens, being intensely confined on a large scale can mean massive amounts of antibiotics - which can be passed along to humans - are required to stave off herd or flock illness and treat common, painful diseases, like mastitis.

Cows confined in industrial factory farms frequently suffer from mastitis. Mastitis is a bacterial invasion of the mammary gland and can occur because of trauma to a cow's udder caused by milking machines, poor sanitation in milking parlors and barns, and genetic selection for extremely high milk yield. Mastitis is the most prevalent disease among dairy cows, and for the cows, is excruciatingly painful.

Cows suffering from mastitis produce milk with a high somatic cell count (SCC) produced in response to the cow's infected mammary gland. An SCC of more than 200,000 cells per milliliter of milk is "abnormal indication of inflammation in the udder."<sup>1</sup> Oregon does not permit milk with an SCC of 500,000 cells per milliliter to be sold. Tillamook's bulk milk from Threemile Canyon Farms, an industrial dairy farm near Boardman, Oregon currently operating with over 60,000 cows, routinely has an SCC of more than 200,000, with SCCs of up to 450,000 in 2016 and 340,000 in 2017.

Antibiotics are also used to speed growth and prevent animals from dying from the wounds and infections that are commonplace on industrial farms. And despite antibiotics, cramped conditions still allow for disease to thrive. Ammonia from urine and waste exacerbate the problem, inflaming and compromising animals' respiratory systems, leaving them even more vulnerable to infection. When animals are intensively confined, this is only amplified.

Humane certification can come from an array of providers but there is a gold standard in the animal protection movement. On one end of the spectrum are publicly traded for-profit certification companies (e.g., Validus that certifies Threemile Canyon Farms) that make money by charging the facilities they inspect (i.e., they are the customers). Industrial confined animal feeding operations would not be certified for animal welfare under more rigorous standards, such as those of the nonprofit A Greener World (the Animal Welfare Approved label), which requires access to pasture and measures to ease the trauma of cows and calves separated after birth, for example.<sup>2</sup>

An industrial confined animal feeding operation moratorium would halt the development of new industrial factory farms and prevent the expansion of existing ones. That means that this moratorium will at least ensure that this destructive method of food production doesn't spread further within our state and will give us an opportunity to address the existing harms from industrial confined animal feeding operations. Given the gaps in our laws, we need to do more to protect all Oregonians before it is too late.

Industrial confined animal feeding operations do not align with the progressive, humane values Oregonians have for the animals in their food system. It is for these reasons that the Animal Legal Defense Fund supports the passage of SB 85-1 and asks you to do the same. Thank you for your consideration of this important issue.

---

<sup>1</sup> U.S. Dep't of Agric., *Dairy 2014: Part II-Milk Quality, Milking Procedures, and Mastitis 011 U.S. Dairies, 2014*, at 47 (Sept. 2016).

[https://www.aphis.usda.gov/animal\\_health/nahms/dairy/downloads/dairy14/Dairy14\\_dr\\_Mastitis.pdf](https://www.aphis.usda.gov/animal_health/nahms/dairy/downloads/dairy14/Dairy14_dr_Mastitis.pdf)

<sup>2</sup> Validus gets three out of five stars, compared to five out of five for A Greener World, in a review by Green America.

<https://www.greenamerica.org/animal-concerns-labels>.

Sincerely,

A handwritten signature in cursive script, appearing to read "JHauge".

Jennifer Hauge  
Legislative Affairs Manager  
Animal Legal Defense Fund  
jhauge@aldf.org  
503-510-4591