

Kansas Cattlemen's Association

For Immediate Release

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KCA Answers Concerns over EPA's Gas Emissions Proposed Regulations

In an effort to reduce greenhouse gases under the Clean Air Act, the Environmental Protection Agency has accepted public comments of its proposed rule making. Kansas Cattlemen's Association has received a number of concerns regarding the possibility of "taxing" cattle and other livestock. Immediately KCA began to investigate such claims and through thorough research was not able to substantiate any proposal to include a "tax" on livestock under the Clean Air Act by the EPA.

In fact, according to the proposed rule on regulating greenhouse gas emissions under the clean air act, the EPA specifically stated, "If GHG emissions from agricultural sources are regulated under the CAA, numerous farming operations that currently are not subject to the costly and time consuming

Title V permitting process would, for the first time, become covered entities. Even very small agricultural operations would meet a 100-tons-per-year emissions threshold. For example, dairy facilities with over 25 cows, beef cattle operations of over 50 cattle, swine operations with over 200 hogs, and farms with over 500 acres of corn may need to get a Title V permit. It is neither efficient nor practical to require permitting and reporting of GHG emissions from farms of this size. Excluding only the 200,000 largest commercial farms, our agricultural landscape is comprised of 1.9 million farms with an average value of production of \$25,589 on 271 acres. These operations simply could not bear the regulatory compliance costs that would be involved."

The EPA continues, "In its draft ANPR, EPA contemplates regulating agricultural greenhouse gas (GHG) emissions under the three primary CAA programs—National Ambient Air Quality Standards ("NAAQS"), New Source Performance Standards ("NSPS"), or Hazardous Air Pollutant ("HAP") standards. Like the Act itself, these programs were neither designed for, nor are they suitable to, regulation of greenhouse gases from agricultural sources. If agricultural producers were covered under such complex regulatory schemes, most (except perhaps the largest operations) would be ill-equipped to bear the costly burdens of compliance, and many would likely cease farming altogether."

Still, the EPA is charged with regulating greenhouse gas emissions under the Clean Air Act. U.S. lawmakers along with the executive administration will undoubtedly be reviewing this issue. The Kansas Cattlemen's Association has contacted legislators to ensure they understand livestock producers' position and contribution to our nation.

"Controlling agricultural emissions under the Clean Air act would limit production agriculture and deplete the already dwindling farms and ranches that are the source of

our nation's most wholesome product...food. Producers understand the importance of a clean environment. Because producers are in this for the long haul, stewardship and sustainability are already a part of their operations, and additional regulations that would run producers out of business would be detrimental to farmers, ranchers, the nation's food supply, and the general public," stated KCA Executive Director, Brandy Carter.

KCA will continue to monitor this situation, be involved in discussions, and work with other organizations to ensure that producers' livelihood is not stripped away by any regulation that would be a hindrance to both producers and the public.