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Senate Committee on Energy & Environment  
Oregon Legislature  
900 Court St. NE  
Salem, TX 97301

Re: **SUPPORT for SB 583** (Dembrow) – Mega-dairies moratorium.

Dear Chair Beyer, Vice Chair Findley, 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 Senate Bill 583. This bill would create a moratorium on the construction of new mega-dairies, as well as the expansion of existing mega-dairies – defined as more than 2,500 cows. The moratorium would be in effect until the State finds that the impacts of mega-dairies on the public interest, including air quality, climate, water quality, water supplies, small- and medium-sized dairies, and animal welfare, have been adequately studied and addressed through passage of additional statutes and rules.

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

A cow's life on a mega-dairy is far from the bucolic image that consumers desire. Their 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 mega-dairies. Cruelty is built into the mega-dairy model.

Instead of grazing on grass, a cow on a mega-dairy typically spends her entire life indoors in a huge concrete and metal building with hundreds if not thousands of other cows, only moving between rows of stalls just bigger than her body 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 dairies are designed to extract as much milk as possible from cows, without regard for the animals' well-being.

In mega-dairies, cows often stand for hours on hard concrete and walk across slick floors coated with feces and urine. However, cows' bodies are not designed to stand on hard surfaces (as opposed to soft grass and dirt), resulting in potentially dangerous slips, foot damage and aggravating lameness. And being intensely confined on a large scale means massive amounts of antibiotics - which can be passed along to humans - are required to stave off herd 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 cows' 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 and an

**All our clients are innocent**

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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, a mega-dairy 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 cows' urine and waste exacerbate the problem, inflaming and compromising the cows' 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 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). Mega-dairies 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>

A mega-dairy moratorium would halt the development of new mega-dairies and prevent the expansion of existing ones. That means that a mega-dairy moratorium will at least ensure that this destructive method of dairy production doesn't spread further within our state and will give us an opportunity to address the existing harms from mega-dairies. Given the gaps in our laws, we need to do more to protect all Oregonians before it is too late.

Mega-dairies 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 583. Thank you for your consideration of this important issue.

Sincerely,



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<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>.