



TENNESSEE FARM BUREAU FEDERATION

July 17, 2025

Division of Water Resources
Tennessee Department of Environment and Conservation
Attention: John Newberry
Davy Crockett Tower, 9th Floor
500 James Robertson Parkway
Nashville, TN 37243

Dear Mr. Newberry,

The Tennessee Farm Bureau Federation (the "TFBF") represents a diversity of commodity producers across the state and is the largest general farm organization in Tennessee, as well as the largest Farm Bureau Federation in the nation with over 690,000 members. On behalf of our member producers, we are grateful for the opportunity to provide comments on the Tennessee Department of Environment and Conservation's (the "Department") 2025 Animal Feeding Operation General State Operating Permit ("CAFO").

Livestock producers have a deep and long-standing interest in protecting the health, safety and wellbeing of their animals, as well as possess a keen understanding of the value of environmental stewardship of the ground around them. Tennessee law has required CAFO permits for decades, and TFBF was instrumental in clarifying existing permitting requirements in 2018 when the Tennessee General Assembly set standards for medium and large liquid waste CAFOs when applying for a state operating permit. TFBF continues to support the current CAFO state operating permit process.

Thanks to leadership from the Department, and diligence from the agricultural industry, the current process is well understood and utilized by those farmers who meet the current size qualifications. Thus, we appreciate the regulations which are already in place and proven. The TFBF would further ask for any future changes to be minimal and of low impact to the farm and overall livestock community.

Stakeholder engagement is vital for regulations to be practicable, which is why TFBF always values the opportunity to engage in providing written comments on issues which impact the agriculture industry. As the Department continues to have conversations regarding potential changes to CAFO permits, we would respectfully request additional time to provide further comment based on the way potential changes could impact Tennessee's number one industry. We appreciate your consideration of these comments and look forward to the many ways we can work with the Department.

Sincerely,

A handwritten signature in black ink that reads "Eric Mayberry".

Eric Mayberry
President
Tennessee Farm Bureau Federation