

Testimony of Jacki Esposito
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EPA's Proposed Rule regarding Meat and Poultry Products Effluent Guidelines

January 31, 2024

10:00 AM EST

Public Hearing at EPA Headquarters
William D. Ruckelshaus Conference Center
William Jefferson Clinton—East Federal Building
1201 Constitution Avenue, NW
Washington, DC 20004

My name is Jacki Esposito. I am the Director of Advocacy at Waterkeeper Alliance, a non-profit environmental organization dedicated to protecting and restoring water quality to ensure everyone's right to clean water. Waterkeeper Alliance comprises more than 300 Waterkeeper groups in 47 countries, covering more than 2.75 million square miles of watersheds. In the United States, Waterkeeper Alliance represents the interests of more than 150 Waterkeeper groups and their more than one million members and supporters.

Given the five-minute time limit, my remarks today do not address all of the defects with EPA's proposed rule.

Waterkeeper Alliance and our supporters are deeply concerned that EPA is proposing to exempt most slaughterhouses and rendering facilities from updated water pollution control standards. Often located in low-income communities and communities of color, these facilities are the largest industrial source of phosphorus pollution and the second largest industrial source of nitrogen pollution in the nation. Nitrogen and phosphorus pollution can cause significant environmental and public health problems such as water contamination and algal blooms, which can render water unsafe for drinking, unfit for recreation, and uninhabitable for aquatic life. EPA's continued failure to stand up against industry pressure ignores and perpetuates the potentially devastating impacts of industrial animal agriculture on our communities and locks in generations of environmental injustice.

In response to lawsuits brought by community and environmental organizations including Waterkeeper Alliance, EPA has proposed three regulatory options to curb water pollution from slaughterhouses and rendering facilities. Although the agency concedes that Option 3 would achieve the greatest amount of pollution reduction, its preferred option is Option 1, which would provide the least amount of pollution reduction and largely excludes thousands of facilities that send their waste to overwhelmed and underfunded municipal sewage treatment plants, unequipped to treat these discharges. Simply put, EPA's preferred option will allow the industry to continue polluting waterways, while ultimately passing the direct and indirect costs of their waste onto the public.

We heard loud and clear from those who profit from this pollution at last week's hearing and during today's proceedings: they want the least amount of regulation and oversight. EPA's decision to support industry's choice over what provides the most protection to our communities is a clear betrayal of its mission "to protect human health and the environment – today and everyday."

EPA is required under the Clean Water Act to set water pollution standards for all industries and to review those standards annually. Despite this legal mandate, EPA has failed to revise water pollution standards for slaughterhouses and rendering facilities for at least 19 years. This is no accident. Industrial animal agriculture companies have invested millions of dollars in lobbying to ensure the status quo.

Pollution from slaughterhouses and rendering facilities exacerbates environmental injustice and overwhelmingly harms low-income communities and communities of color. According to federal data, nearly half of the slaughterhouses in the U.S. are in communities where more than 30 percent of residents live beneath the poverty line and a third are located where at least 30 percent of the residents are people of color.

EPA concedes in the proposed rule that improving water quality through pollution reduction in surface water and drinking water is expected to have the greatest benefit on low-income communities and communities of color. These community members have the most to lose and yet not a single public hearing on this proposed rule has happened where the individuals most directly impacted live. Instead, EPA issued the proposed rule the day *after* the registration deadline to speak at the virtual hearing. This is not meaningful involvement, and it is not in line with President Biden's [Executive Order 14096](#).

Waterkeeper Alliance calls on EPA to reject industry influence to put profit over people and the planet. The agency must do its duty and commit to a modernized, robust regulatory framework that protects, strengthens, and enforces water pollution standards for slaughterhouses and rendering facilities.