**Dear Michigan Legislators,**

We urge you to vote **NO** on House Bills 4257 and 4265 ("Bills"), which would significantly weaken Michigan's environmental protections by stripping away essential oversight of harmful waste streams processed through anaerobic digesters. These Bills are written so broadly that they would apply to any facility with a digester, regardless of location or feedstock type. That includes those handling manure from Concentrated Animal Feeding Operations (CAFOs), slaughterhouse waste, and industrial waste.

We are deeply concerned about the following:

- **If passed, these bills would turn Michigan's farmland and rural communities into dumping grounds for underregulated industrial waste.** Anaerobic digestion is not a waste management solution, despite how it is marketed by corporate entities profiting from the commercial production of methane gas, also known as biogas. The real driver behind the push for digesters and deregulation isn't public good; it's profit. These bills clear the path.
- **Digestate, the material left after digestion, is not a benign fertilizer.** It can contain microplastics, PFAS, heavy metals, pharmaceuticals, and other harmful substances, none of which are neutralized by the digestion process. The technology does not eliminate odors or pathogens, nor does it reduce overall waste volume or nutrient load. In fact, the nitrogen and phosphorus in digestate become more water-soluble, increasing the risk of leaching into groundwater and running off into nearby lakes and rivers. This poses a greater threat to private drinking water wells and will worsen nutrient pollution in Michigan's already impaired surface waters.
- **Any facility that adds a digester would be exempt from the siting, licensing, and operational requirements that normally apply to disposal areas under Part 115.**
- **EGLE would no longer have meaningful oversight of these dangerous waste streams, and the Bills' one-time registration requirement is no substitute for the more protective standards of NPDES permits.** Instead, operators would be granted legal immunity for discharges as long as they follow GAAMPs—unenforceable, voluntary guidelines that are weaker and never intended to govern industrial waste disposal.

For a more detailed assessment of the environmental risks, and a legal analysis of how these bills violate the Michigan Constitution's natural resources protection mandate, the Michigan Environmental Protection Act (MEPA), Part 31 of the Natural Resources and Environmental Protection Act (NREPA), the federal Clean Water Act, and other environmental protections, we urge you to review the enclosed memorandum prepared by the Environmental Law & Policy Center.

**Please stand up for Michigan's waters, farmland, and rural and downstream communities. Vote NO on HB 4257 and 4265.**

Sincerely,
[Coalition Name(s) and Signatories]

**Michiganders for a Just Farming System**, Cheryl Ruble, MD, Steering Committee Member
**Environmental Law & Policy Center (ELPC)**, Katie Garvey, Staff Attorney
**Sierra Club Michigan Chapter**, Christy McGillivray, Political and Legislative Director
**Clean Water Action**, Sean McBrearty, Michigan Director
**For Love of Water (FLOW)**, Liz Kirkwood, Executive Director
**Washtenaw350**, Rita Mitchell and Lauren Sargeant, Co-Founders
**Humane Society of Huron Valley (HSHV)**, Tanya Hilgendorf, President
**Food & Water Watch**, Alex Beauchamp, Northern Region Director
**New Roots Institute**, Amy Halpern-Laff, Strategy Advisor
**Michigan Clinicians for Climate Action (MiCCA)**, Lauren Church, Interim Executive Director
**Michigan Lakes and Streams Association (MLSA)**, Melissa DeSimone, Executive Director
**Michigan Farmers Union**, Bob Thompson, President
**The Van Buren Climate Action Team**, Jonathan Gingerich, Director of Operations
**Farm Forward**, Trevor McCarty, Research and Policy Manager
**Friends of the Earth**, Molly Armus, Animal Agriculture Policy Program Manager
**Attorneys for Animals, Inc.**, Beatrice Friedlander, Board President
**Earthjustice**, Peter Lehner, Managing Attorney, Sustainable Food and Farming Program
**Progress Michigan**, Sam Inglot, Executive Director
**Zero Waste Detroit**, Deborah Stewart Anderson, Executive Director
**Socially Responsible Agriculture Project (SRAP)**, Sherri Dugger, Executive Director
**Michigan Against Digesters (MAD)**, Jill Holister, Administrator
**Freedom Township Preservation**, Jill Holister, Administrator
**Michigan Waterfront Alliance**, Robert Frye, President
**ROAD (Reviving Our American Democracy)**, Tracy Dobson, President