FARMFORWARD

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A NIGHTMARE VISION OF AGRICULTURE IN IOWA: HOW FACTORY FARM GAS COULD GUARANTEE ANIMAL SUFFERING & BLOCK FOOD SYSTEM REFORM

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EXECUTIVE SUMMARY

Iowa, along with the rest of the Midwest, is making a bad bet on factory farm gas (FFG). The state is at the center of a national push by fossil fuel companies and meat and dairy companies to expand FFG, also known as "manure biogas." This gas is produced in large sealed tanks called anaerobic digesters, which collect the gas that emanates from the cesspools of animal waste collected from cows and pigs on factory farms. After capture, the gas is processed and then used for fuel, heat, and electricity.

State government leaders have joined their federal counterparts to support these projects, which are touted as an economically viable method of producing clean energy. But these projects are built on a false premise. **FFG is neither clean nor economically viable.** They have the potential to **cost the public millions and increase farm-related pollution by locking in the worst of the factory farm system.**

And they carry two great costs that have gone largely unnoticed: **they would condemn millions of future animals to lives of suffering in extreme confinement, while simultaneously blocking pathways to genuine food system transformation.**

Iowa and the rest of the Midwest face a choice of what future they want to build: do they want to become architects of this nightmarish version of animal agriculture **where animals are treated as power plants and locked into factory farms for decades to come**? Or do they instead want to become exemplars of building a better future for people, animals, and the environment?

Photograph by Jo-Anne McArthur / We Animals

Key Takeaways from our issue brief below:

- **Iowa state policy, as well as recent federal legislation, has cleared the way and provided the funds for more FFG.** Iowa has raised its animal capacity limits for farms with digesters, and the number of animals at such sites grew shortly after. At the federal level, the "One Big Beautiful Bill Act" extended FFG credits through 2029 while gutting wind and solar incentives. All of this happened during the state's unprecedented pollution crisis, much of it resulting from industrial animal agriculture.
- **The FFG industry is not working, and the ecosystem is fragile.** Several notable FFG projects have failed, and gone delinquent on government loans, leading federal officials to recently issue a long-term pause on further federal loans.
- **Factory farm gas buildout could condemn countless animals to suffering.** Iowa has more potential FFG sites than almost any other state (~2,800), yet only a small fraction of that capacity has been achieved, so expectations for possible buildout of biogas operations are high. The industry actualizing its projections could lock millions of animals into factory farms for decades to come.
- **Factory farm gas blocks the pathways to genuine food systems transformation.** FFG acts as a subsidy and support to the industrial factory farm model, with all of its associated air and water pollution problems. Farmer transitions, regenerative agriculture, and other models of a better food system are all disadvantaged when policies support FFG. At the same time, FFG also creates a new coalition led by the two largest contributors to our climate crisis: industrial agriculture companies and fossil fuel companies. Those companies now have shared financial incentives to jointly wield their huge political power to block food system reform.

We urge legislators and policymakers to:

- Stop subsidizing factory farm gas through grants, tax credits, and carbon programs
- Help farmers transition away from industrial confinement systems
- Redirect public funds toward real food system reforms

INTRODUCTION

Mega-factory farms, industrial operations that collectively confine billions of animals, are among the most destructive forces in modern agriculture,[1] and they inflict mass suffering on the vast number of animals trapped within these systems. These animal factories also generate inconceivably large amounts of waste, hasten climate change, and propagate antibiotic-resistant superbugs that pose serious dangers to public health.[2]

In an effort to wrest even greater profits from industrial animal agriculture, energy companies, meat and dairy companies, and related stakeholders have invested in and lobbied for new factory farm gas (FFG) operations, which could number in the thousands in the coming years.[3]

These operations involve attaching devices called anaerobic digesters to manure cesspools to capture methane and other gases. Animal waste and other additives are processed; a pollutant called digestate is left behind.[4] One of the most common uses of the refined gas is as "renewable" diesel, which is marketed as a climate-friendly fuel despite concerns that the overall system, from digestate runoff to methane leakage,[5] generates significant environmental harm that may undermine any greenhouse gas reductions.

The vast array of government incentives and programs available for FFG includes federal tax credits and grants as well as state-level carbon credit programs.[6] Farm Forward's 2025 analysis of publicly available data has confirmed that these subsidies flow almost exclusively to the largest and most polluting operations.[7] FFG and related incentives, therefore, function to lock in the **worst practices of factory farming,** making it more difficult to implement food reform policies that challenge or mitigate the harms of conventional factory farming. In this vein, FFG operations can create a world where dairy production, for example, is just as much about farming methane as it is about farming

When factory farms can generate additional revenue streams from FFG production, they become more financially resilient, reducing the competitive pressure that might otherwise drive investment toward alternatives.

1 Farm Forward, "Climate and the Environment."

2 Melinda Wenner Moyer, "How Drug-Resistant Bacteria Travel from the Farm to Your Table," *Scientific American* 315, no. 6 (December 2016): 70.

3 See American Biogas Council, "Biogas State Profiles."

4 Michael A. Holly et al., "Greenhouse Gas and Ammonia Emissions from Digested and Separated Dairy Manure During Storage and After Land Application," *Agriculture, Ecosystems & Environment* 239 (2017): 410–19, https://doi.org/10.1016/j.agee.2017.02.007.

5 Imperial College London. "Biogas and Biomethane Supply Chains Leak Twice as Much Methane as First Thought." *ScienceDaily*, June 17, 2022.

6 U.S. Environmental Protection Agency. "Project Planning and Financing." AgSTAR: Biogas Recovery in the Agriculture Sector. Last modified March 11, 2025.

7 Farm Forward. *Gaslit by Biogas: Big Ag's Reverse Robin Hood Effect.*

milk, due to the lucrative incentive programs offered.[8] Or put another way: "feces farms that happen to also produce dairy."[9] This leads to a perverse outcome: **artificially making dirty industrial farming methods more financially appealing to producers than they already are**.

When factory farms can generate additional revenue streams from FFG production, they become more financially resilient, reducing the competitive pressure that might otherwise drive investment toward alternatives. Further, the environmental narrative around FFG (presenting factory farms as part of the climate solution) may *falsely* diminish public concern about the harms of industrial animal agriculture, weakening one of the key drivers for pursuing alternatives. Iowa, a major agricultural state where a powerful set of industries has laid the groundwork for generations of factory farm entrenchment, exemplifies this reality coming to fruition.

Photograph by Ram Daya / We Animals

8 Maureen Nandini Mitra, Farming Methane, podcast audio, KPFA – Terra Verde, produced by Earth Island Journal, June 16, 2023.

9 Jessica Fu, "Brown Gold: The Great American Manure Rush Begins," *The Guardian*, February 2, 2023.

IOWA STATE POLICY, AS WELL AS RECENT FEDERAL LEGISLATION, *HAS CLEARED THE WAY AND PROVIDED THE FUNDS FOR MORE FFG.*

Efforts to entrench factory farming come in the form of deregulation as well as financial support. In 2021, the Iowa legislature passed HF 522, which lifted animal capacity caps for farms with digesters. Prior law capped animal feeding operations at 8,500 animal units (which equates to a given number of cows, pigs, or chickens) unless they used aerobic manure treatment systems. HF 522 allowed digesters as an alternative, which removed the ceiling. As a result, animal numbers at permitted sites grew 23 percent not long after.[10] This outcome reinforces the concern that FFG operations increase financial incentives for bigger herds, given just how profitable manure gas can be.[11]

The financial engine driving the industry's FFG expansion is government support. Federal and state programs channel unprecedented subsidies, including millions of dollars in tax credits, grants, and government-backed loan guarantees, to FFG operations across the country. State entities, such as state strategic funds, contribute by issuing hundreds of millions in tax-exempt Private Activity Bonds (PABs) to corporate interests. Digester operations are often completely reliant on such subsidies; in some cases, over 90 percent of a digester's projected revenue comes not from selling gas directly but from government programs.[12]

Expanding and entrenching factory farms in Iowa is *particularly* concerning, considering recent developments in the state regarding nitrate pollution. A 2025 assessment of water pollution for the Des Moines and Raccoon Rivers found that past nitrate concentrations in those waterways ranked at the 95th and 96th percentiles among all U.S. rivers, driven heavily by the density of livestock agriculture.[13] Elevated nitrate in drinking water is linked to colorectal cancer, thyroid disease, and neural tube defects, with risks appearing even below the federal regulatory limit.[14]

Pigs alone account for 78 percent of all nitrogen excreted by farmed animals in the affected

10 Erin Jordan, "Iowa Dairies with Biogas Digesters Are Growing Their Herds, Which Concerns Water Quality Advocates," *The Gazette*, published by Investigate Midwest, November 4, 2024.

11 Ibid.

12 Hyunok Lee and Daniel A. Sumner, "Dependence on Policy Revenue Poses Risks for Investments in Dairy Digesters," *California Agriculture* 72, no. 4 (2018): 226–235.

13 Central Iowa Source Water Research Assessment (CISWRA), *Currents of Change: Final Scientific Assessment of Source Water Research Report* (Des Moines, IA: Polk County Board of Supervisors, 2025).

14 Mary H. Ward, Rena R. Jones, Jean D. Brender, Theo M. De Kok, Peter J. Weyer, Bernard T. Nolan, Cristina M. Villanueva, and Simone G. Van Breda, "Drinking Water Nitrate and Human Health: An Updated Review," International Journal of Environmental Research and Public Health 15, no. 7 (July 23, 2018): 1557, https://doi.org/10.3390/ijerph15071557.

watersheds.[15] Unsurprisingly, getting agricultural pollution in check is a popular issue in the state: polling reveals that "82% of Iowa voters would be more likely to vote for an elected official who makes it a top priority to protect clean water in Iowa, including cutting pollution from industrial agriculture."[16] Cleaning up the water makes sense as a top priority, as "ninety-five percent of counties in Iowa produce more animal manure than human manure, and all but six of Iowa's counties qualify as high or severe hog density counties."[17]

Compounding state policy, the recently passed "One Big Beautiful Bill Act"[18] represents a significant legislative development for the biogas industry, providing substantial new incentives and financial support for factory farm gas operations.

Specifically, the bill establishes:

- **A two-year extension of the Clean Fuel Production Tax Credit (Section 45Z):** The bill extends federal subsidies for FFG production through December 31, 2029, providing tax credits for renewable gas from livestock manure and other organic waste, including industrial dairy, pig, and poultry operations.
- **Animal manure recognized as an eligible feedstock for digesters:** The bill explicitly qualifies pig, cow, and chicken manure under the credit, solidifying factory farm waste as a subsidized input in federal clean fuel policy.

The biogas lobby enthusiastically welcomed the legislation, with the American Biogas Council

Photograph by Balvik C. / We Animals

(ABC) commending the bill, saying "The Act contains several helpful provisions for the biogas sector, acknowledging the enormous potential of recycling decomposable waste – from farms, food systems, and wastewater treatment plants – to produce reliable American-made energy."[19] Simultaneously, the legislation dismantles pro-renewable energy policy, including phasing out clean energy tax credits for wind and solar energy and rolling back electric vehicle and battery tax credits.[20] The federal legislation, combined with state-level deregulatory efforts, doubles down on the factory farm model and undermines alternative visions.

15 CISWRA, *Currents of Change,* 41.

16 Global Strategy Group, "New Poll Reveals Strong Cross-Party Support for Clean Water Protections, Industrial Agriculture Regulations," memorandum to Interested Parties, February 2026.

17 Koons, Cami. "Report: Iowa Produces the Most Factory Farm Waste in the Country, New Report Shows." Iowa Capital Dispatch, September 24, 2024.

18 One Big Beautiful Bill Act, H.R. 1, 119th Cong. (2025).

19 Jacob Wallace, "Plastics, Biofuels Groups Praise Signing of Trump's One Big Beautiful Bill Act," *Waste Dive*, July 7, 2025, published by TechTarget and Informa Tech.

20 Jack Andreasen Cavanaugh et al., "Assessing the Energy Impacts of the One Big Beautiful Bill Act," Center on Global Energy Policy at Columbia University SIPA, July 14, 2025.

FACTORY FARM GAS IS NOT WORKING, *AND ITS ECOSYSTEM IS FRAGILE*

Despite this paving of the way, the reality is that FFG operations are fragile: they require immense, and essentially endless, subsidies and support, and are difficult to maintain.[21] Further, recent investigative reporting revealed major cases of delinquency from factory farms and other companies that received government loan programs to finance biogas operations.[22] USDA cited these high rates of delinquency in its recent decision to pause new loans to digester operations, saying: "Twenty-one loans for anaerobic biodigesters which make up $386.4 million are currently seeing $102.6 million or 27 percent in delinquency."[23] The pause was then extended: on April 7, USDA announced it would continue its suspension of loan guarantees for new anaerobic digester projects through December 31, 2026. The decision came after a formal rulemaking petition filed in January 2026 by Earthjustice and Friends of Earth, along with a coalition of 30 organizations including Farm Forward, urging USDA to permanently bar manure digesters from loan eligibility. As a result, Earthjustice then filed a lawsuit challenging USDA's withholding records related to manure digester funding.

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It's not only at the federal level that FFG is running aground. There is also trouble at the state level. **The FFG ecosystem in Iowa, for example, appears particularly fragile when compared to the national statistics—a Food and Water Watch analysis of EPA data puts the state's digester failure rate at 42 percent.**[24]

And consider the recent fight in Michigan over factory farm gas. A nexus of industries have pushed for a bill (SB 275) that would create a carbon market for FFG, heavily incentivizing more methane, more manure, and ultimately more factory farming.[25] Pushback from environmental groups and others appears to have slowed down the bill, but it is expected by some to be reintroduced in 2026. **Opposition from those concerned about factory farming is strong and unlikely to wane over time.**

A related case in Michigan concerning a large-scale dairy further elucidates the concern that FFG operations could be used as a

21 Food & Water Watch, "Hard to Digest: Greenwashing Manure into Renewable Energy," Issue Brief, November 2016.
22 Brian Bienkowski, "Wisconsin Manure Digester at the Center of USDA Loan Trouble," The New Lede, February 23, 2026.
23 J.R. Claeys, "90 Day Administrative Pause on Biodigesters and Controlled Environment Agriculture Applications Pending Portfolio Performance Review," Unnumbered Letter, United States Department of Agriculture, Rural Business Cooperative Service, January 2026. See the document at this link under "Business/Community Programs."
24 Food & Water Watch, "Selling Scams: Big Ag's False Solutions in Iowa," report, March 2024.
25 Brian Allnutt, "Michigan 'Clean Fuel' Legislation Draws Heat from Environmental Groups," *Planet Detroit*, November 27, 2024.

clever justification for expanding industrial dairy operations.[26] The continuing revelation of this possibility could further break a fundamentally fragile technology. Indeed, organizations like Project Drawdown, which tend toward optimism about technology's capacity to mitigate climate change, have articulated sober critiques of FFG and digesters, noting their high capital costs, perverse incentives, and other challenges.[27]

The vision of a model of agriculture that uses animals as power plants can only work in the narrow scenario of an interconnected web of deregulation, tax credits, subsidies, loans, and carbon markets funneling billions of dollars to the industry, further entrenching and expanding factory farming in the name of climate mitigation.[28] USDA pausing loans to digesters, along with effective local advocacy, gives some reason to be skeptical that FFG buildout is a foregone conclusion. This bet, then, looks less like a promising climate strategy and more like a risky financial gamble with major costs for people, animals, and the environment.

Photograph by Jo-Anne McArthur / We Animals

26 Brian Bienkowski, "A Michigan Dairy CAFO Clash over Manure Digesters and Clean Water," The New Lede, February 9, 2026.
27 Project Drawdown, "Deploy Methane Digesters," Drawdown Explorer, last updated November 13, 2025.
28 Allie Wainer et al., "Deconstructing the Livestock Manure Digester and Biogas Controversy," Current Environmental Health Reports 12, no. 43 (2025).

FACTORY FARM GAS BUILDOUT *COULD CONDEMN COUNTLESS ANIMALS TO SUFFERING*

Iowans appear to be highly pro-animal; high percentages of Iowans support consequences for animal abuse,[29] and a majority favor a moratorium on the construction of new factory farms.[30] In general, most Americans (79 percent) are somewhat or very concerned about the negative impacts of industrial animal agriculture on animal welfare:[31] animals in factory farms endure lives of abject suffering at every stage of production, they are routinely raised in overcrowded conditions with poor ventilation and no access to the outdoors, and are also genetically modified to grow quickly, leading to disease and high mortality rates.[32] Over 90 percent of animal products on the shelves at grocery stores originate from animals enduring miserable conditions from nearly the moment they're born until they're slaughtered for food.[33] Pigs, for example, endure extreme confinement in gestation crates, preventing them from turning around or engaging in their natural behaviors. They also suffer mutilations like tail docking, ear notching, and castration, usually without pain relief.[34] Like pigs, dairy cows routinely undergo dehorning (the removal of horn tissue) often with hot irons or chemicals with little or no pain relief.[35]

In general, most Americans (79 percent) are somewhat or very concerned about the negative impacts of industrial animal agriculture on animal welfare

These kinds of practices are implemented to maximize production, with little concern for even basic animal welfare considerations. States like Iowa raise millions of animals in these conditions. **The nature of FFG capture *requires* the mass confinement and hyperindustrialized production of farmed animals because it requires inherently polluting practices like the collection of waste in manure cesspools.**[36] Therefore, higher welfare animal farming operations, like

29 Mary Green, "Talks for Anti-Animal Cruelty Bill Renew as Poll Reveals Public Support for It in Iowa," KCRG, January 13, 2020.

30 Johns Hopkins Center for a Livable Future, "Survey: Majority of Voters Surveyed Support Greater Oversight of Industrial Animal Farms," December 10, 2019.

31 American Society for the Prevention of Cruelty to Animals (ASPCA), Opinion Surveys on Food & Farming Systems.

32 Farm Forward, "Animal Welfare," Farm Forward.

33 Hannah Ritchie, "How Many Animals Are Factory-Farmed?," Our World in Data, September 2023, updated November 2024.

34 Animal Welfare Institute, "Inhumane Practices on Factory Farms."

35 Jessica Whiting, "All Cows Feel Pain, But Not All Get Pain Relief," Faunalytics, August 5, 2025, summarizing L. N. Edwards-Callaway et al., "A Nationwide Survey on Producer and Veterinarian Perceptions of the Painfulness of Procedures and Disease States in Dairy and Beef Cattle," Frontiers in Pain Research 4 (2023): 1059224, https://doi.org/10.3389/fpain.2023.1059224.

36 Stephanie Lansing et al., *Maryland Animal Waste Technology Assessment and Strategy Planning*, Final Report to the Maryland Department of Agriculture (College Park: University of Maryland, September 2023).

pasture-centric models and low-confinement operations, are not compatible with successful and widespread FFG production.

And expectations are high. The federal government and biogas lobby estimate significant potential for an unprecedented increase in the number of manure-based digester operations.[37] The American Biogas Council estimates that Iowa, a major farm state with reportedly only 11 agricultural digesters at the time of writing, has the future potential for more than 2,800,[38] **an increase of roughly 25,000 percent.** Estimates like this provide insight into the possible reach and depth of anaerobic digester operations in the coming years[39] and the recent surge of public and private investment supports these expectations.[40] The EPA estimates that about 42,000 animals are currently "connected" to FFG operations in the state of Iowa,[41] that is, tens of thousands of animals are already feeding digesters in Iowa alone. Taking the American Biogas Council's projections for Iowa's potential expansion as a guide, we estimate that approximately 11 to 12 *million* animals could become connected to Iowa digesters in the coming decades, representing an almost inconceivably large percentage increase.[42]

Critically, the ABC's Iowa projections make clear that this intended expansion is not primarily about dairy cows, which represent the current FFG buildout in the state. Of the total manure tonnage estimated to be processed by Iowa's digester operations, pig manure accounts for roughly 40 million tons per year compared to just 2 million tons for dairy.[43] Factory farm gas, at least when it comes to Iowa, would be overwhelmingly a pig industry, and would involve millions of animals.[44]

The American Biogas Council estimates that Iowa, a major farm state with reportedly only 11 agricultural digesters at the time of writing, has the future potential for more than 2,800

These projections align with other estimates from the ABC. For example, in a June 2025 press release, the ABC noted that "Biogas systems could be built at 11,200 livestock farms" and that "Iowa leads the nation in the number of additional biogas systems that could be built—nearly 2,900."[45] According

37 "Anaerobic Digestion on Swine Farms," U.S. Environmental Protection Agency.

38 American Biogas Council, Biogas State Profiles: Iowa. This source lists one more digester than the EPA AgSTAR database, which we cite elsewhere in this document.

39 Animal waste-based ones specifically.

40 *Gaslit by Biogas.*

41 U.S. Environmental Protection Agency. "Livestock Anaerobic Digester Database." AgSTAR: Biogas Recovery in the Agriculture Sector. Last updated June 2024. We assumed that ones listed as under construction are currently operational.

42 Animal count data for Iowa's current digester operations were drawn from the EPA AgSTAR Livestock Anaerobic Digester Database. Summing across Iowa's 10 operational and under-construction projects (as listed in AgSTAR) outputs approximately 42,500 animals currently connected, producing a per-digester average of approximately 4,250 animals. This figure was multiplied by the ABC's projected ~2,800 Iowa digesters to estimate 11.9 million animals connected under full build-out. This is merely an estimate based on limited available data.

43 American Biogas Council, "Biogas State Profiles: Iowa."

44 Cole Rosengren, "The U.S. Could Increase Biogas Projects 8-Fold, American Biogas Council Says," W*aste Dive*, June 11, 2025, updated September 18, 2025.

45 Melissa Bailey, "American Biogas Council Releases New Data Showing Biogas Systems' Capacity to Capture Energy from Waste" (press release, American Biogas Council, Washington, DC, June 4, 2025; corrected June 6, 2025).

to data from the EPA, there are around 21,000 CAFOs in the United States.[46] Taken together, this indicates that around half of the country's CAFOs could be connected to FFG operations at some point in the future. In Iowa specifically, estimated biogas build-out would cover a strong majority of Iowa's roughly 4,000 CAFOs.[47] **This is a nightmarish vision: one where farmed animals are viewed, first and foremost, as an eternal source of power, arbitrarily locked into the worst systems for generations to come.** When there are so many better alternatives for reducing methane emissions within the agricultural system,[48] doubling down on this future doesn't make sense.

Importantly, these estimates are not meant to be precise predictions of the future, but rather attempts to draw attention to the scale of what's possible given the industry's own estimates. Incentives for FFG will drive this scaling up, in turn **incentivizing production practices that cause extreme levels of suffering for animals.** It is notable that major meat and energy companies have signed decade-long partnership agreements to produce FFG for years to come,[49] but it is impossible to say for sure what the future of FFG holds, as it is dependent on numerous complicated factors. And it is precisely this uncertainty that makes it so critical to consider the implications of FFG now, while it is still early enough to reconsider its widespread expansion.

Photograph by Human Cruelties / We Animals

46 U.S. Environmental Protection Agency, *NPDES CAFO Permitting Status Report: National Summary, Endyear 2023* (completed May 14, 2024).

47 Ibid.

48 Swati Hegde and Mike Badzmierowski, "Promising Technologies Need a Bigger Push to Cut Manure Emissions in the US," World Resources Institute, August 6, 2025.

49 For one example, see "Pioneering Alliance to Decarbonise Farming in America," World Biogas Association, January 16, 2020.

FACTORY FARM GAS LOCKS OUT THE PATHWAYS *TO GENUINE FOOD SYSTEMS TRANSFORMATION*

The expansion of FFG infrastructure in places like Iowa threatens not just animals living in confinement, but *long-term* prospects for a better food system. **FFG directs public funding, political capital, and institutional attention toward entrenching factory farming, leaving fewer resources and less focus available for the alternatives.** It also creates a new and powerful coalition of interests: energy companies, meat and dairy producers, and utilities all stand to profit from a world where manure is a valuable climate commodity, as opposed to a waste product, giving them aligned financial interests in opposing any meaningful reforms. Iowan advocates have been clear-eyed about this. In Food and Water Watch's November 2025 nationwide analysis of factory farm gas incentives, Iowa Citizens for Community Improvement's Ava Auen-Ryan stated: "We do not want a transportation fuel policy that entrenches and enriches Iowa Select, Smithfield, Tyson, JBS, and Prestage Farms at the expense of our communities, land, air, and water."[50] In a time when we need to move away from the factory farm model and shift toward a more plant-centric food system, this blow to reforms could be catastrophic.[51]

A world where cows, pigs, and chickens are locked into intensive agriculture so that their waste can turn into a profitable commodity is incompatible with a positive vision of agriculture that better meets the needs of farmers, communities, animals, and the environment.

Consider an example. The focus on FFG expansion poses a direct threat to farmer transition, sometimes known as "transfarmation," in which, according to The Transfarmation Project, "farmers transition from industrial animal agriculture operations to raising crops for human consumption. By creating models of alternative economic opportunities, building solidarity with other movements, and shifting societal narratives to change culture, we will realize a just and sustainable food system."[52] Transfarmation offers a credible vision of food system reform that takes both animal welfare and farmer livelihoods seriously, and it has attracted serious political attention, including a 2024 legislative proposal introduced by Rep. Alma Adams and Sen. Cory Booker.[53] **But transfarmation requires a political and economic environment willing to question the factory farming model, not**

50 Amanda Starbuck and Tyler Lobdell, "LCFS: Bigger Factory Farms, More Pollution, Nationwide," Food & Water Watch, November 18, 2025.

51 Anna-Lena Klapp, Nanine Wyma, Roberta Alessandrini, Catherine Ndinda, Armando Perez-Cueto, and Antje Risius, "Recommendations to Address the Shortfalls of the EAT–Lancet Planetary Health Diet from a Plant-Forward Perspective," *The Lancet Planetary Health* 9, no. 1 (January 2025): e23–e33.

52 The Transfarmation Project, A Farmer-Led Movement for a Better Food System.

53 Farm Forward, "Farm Forward Supports the Industrial Agriculture Conversion Act," Farm Forward, September 25, 2024.

one that is inextricably linked to it. Incentive programs that make manure more profitable will make the case for transition harder, and every decade-long infrastructure commitment makes the existing system harder to reform. Indeed, the very premise of farm transitions would dramatically lower the prevalence of manure cesspools, the core of FFG, and the source of a new rush for "brown gold."[54]

Regenerative agriculture, as a practice-based paradigm, faces the same obstacle. Regenerative practices (e.g., cover cropping, rotational grazing, reduced tillage, and pasture-based livestock systems) are premised on lower animal densities and the elimination of the concentrated waste streams that FFG depends on. As noted in a Farm Forward report on regenerative agriculture: "animal welfare is not yet a central component of the regenerative movement, [although] portions of the movement do align themselves with the values and goals of farmed animal protection."[55]

A farm transitioning toward regenerative practices is, by definition, moving away from the conditions that make FFG fundamentally viable. Yet regenerative agriculture may compete for the same public investment and policy attention now flowing to manure digesters. In fact, a recent USDA announcement elucidates this tension: $700 million of funding was set aside to help farmers and ranchers adopt soil- and water-health practices through existing USDA conservation programs.[56] Depending on where this funding goes and how it's used, it could be a promising change for USDA,[57] which historically has thrown its support behind the most intensive models of animal farming.[58] **FFG preempts such appeals to regenerative agriculture by offering a greenwashed version of climate-friendly farming that requires no structural change to industrial methods.** A world where cows, pigs, and chickens are locked into intensive agriculture so that their waste can turn into a profitable commodity is incompatible with a positive vision of agriculture that better meets the needs of farmers, communities, animals, and the environment.

Energy companies, meat and dairy producers, and utilities all stand to profit from a world where manure is a valuable climate commodity, as opposed to a waste product, giving them aligned financial interests in opposing any meaningful reforms.

54 Fu, "Brown Gold."

55 Farm Forward. "Regenerative Agriculture Report: An Agricultural Movement's Alignment with Farmed Animal Welfare." Farm Forward, October 2020.

56 U.S. Department of Agriculture, "USDA Launches New Regenerative Pilot Program to Lower Farmer Production Costs and Advance MAHA Agenda," press release, December 10, 2025.

57 Then again, the change may be less promising than it initially appears. Farm Forward exposed animal abuse at a regenerative industrial dairy called Alexandre Family Farm, leading to two lawsuits against Alexandre and the dairy surrendering its Regenerative Organic Certified status. A month later, in December 2025, USDA featured Alexandre as a regenerative exemplar. John Millspaugh, "When Transparency Wins: Alexandre Family Farm Loses Two Certifications," Farm Forward, March 13, 2026.

58 Environmental Working Group, "USDA Livestock Subsidies Near $50 Billion, EWG Analysis Finds," February 2022.

CONCLUSION

FFG is a boon for factory farming. It fits into a picture of agriculture that centers highly intensive, polluting animal factories as sources of energy, condemning millions of animals to be living power plants. Accordingly, FFG funding streams should be considered akin to any other factory farm subsidy, and one that will bolster a slate of industries that have clear interests in opposing commonsense food system reform. **Iowa, specifically, stands at an interesting moment.** On the one hand, Iowa is a major agricultural state with a thriving animal farming ecosystem and significant potential for FFG buildout; on the other hand, Iowa is dealing with some of the worst consequences of such an ecosystem, including runaway nitrate pollution.

Broadly, we recommend the following:

- **End public subsidies for factory farm gas:** Eliminate federal and state grants, tax credits, and loan guarantees for factory farm-based anaerobic digesters (USDA's recent pause on loans to manure digesters points in the right direction).
- **Invest in better solutions:** Support policies that reduce animal product proliferation (e.g., plant-based defaults) while also helping farmers transition to sustainable, pasture-based systems that don't require massive waste cesspools or expensive greenwashing technology.
- **Pass the Industrial Agriculture Conversion Act, the Farm System Reform Act, and similar legislation:** Support federal and state-level legislation that prevents conservation funding from subsidizing methane digesters and instead invests in transitioning farmers away from industrial confinement systems to more environmentally sound, higher welfare alternatives.

Photograph by Crystal Heath / Our Honor / We Animals

AUTHOR & ACKNOWLEDGMENTS

Farm Forward was founded in 2007 as the nation's first nonprofit devoted exclusively to end factory farming. We are a team of strategists, campaigners, and thought leaders guiding the movement to change the way our world eats and farms.

More information about Farm Forward's work and our other publications can be found at farmforward.com.

This issue brief was written by Trevor McCarty, with invaluable contributions from Farm Forward staff.