

LABOR MANAGEMENT

By Lee Telega

Avoid inspection
anxiety

Bring CAFO Under Management

It's a beautiful spring morning. Things are going well in the barn and in the fields. The walk down to the mailbox is a refreshing break from a morning of questions, directions and phone calls. Songbirds sing, the sun is bright and the breeze cool. You open the box and there it is. Right on top, as if the mailman wanted it to be the first thing you see. It is a white envelope blazoned with the insignia and return address of your friendly environmental agency.

Your heart thumps hard. The pit in your stomach turns. Your immediate reaction, "No, not during the busiest time of the year!"

The announcement of an inspection to check compliance with your CAFO permits should not be cause for such anxiety. Dairy businesses already have too many other uncertainties to be anxious about, several of which you have no direct control. But something as directly controllable as compliance with CAFO should not be one of them. Incorporating the tasks required by your permit into the routine operation of your farm will alleviate the feeling of unpreparedness and no longer spoil a perfect spring morning.

What do CAFO inspectors look for?

Though different states may have different policies, the general purpose of a CAFO inspection is to determine a farmer's compliance with its permit requirements. Inspectors will also evaluate conditions of nearby receiving water bodies, determine the operator's familiarity with permit requirements, respond to questions and relay information on changing regulations and, of course, inform operators of deficiencies.

Inspectors will look at field records for manure and fertilization applications. They also look at manure and other waste storage records to ensure they are regularly monitored. They may want to see evidence of practices that are required by the farm's permit, such as inspections and maintenance/operation of clean water control devices and structures.

Inspectors also walk the farmstead to look for obvious signs of pollution and potential for pollution. They look to see if gutters, drip-trenches, diversions and other clean water control devices work properly. They will notice if waters are overflowing and at other ways clean water becomes contaminated

and flows off the farmstead. They will inspect and may ask for the designs of vegetative treatment areas to ensure they are maintained well and function properly. They will ask about disposal practices of dead animals.

They will also notice other potential environmental hazards not specifically covered by CAFO, such as bulk petroleum or pesticide storage and handling. They may ask where floor drains in utility rooms, shops and equipment storage areas go. They may also ask how regular trash is handled as well as more hazardous waste such as batteries and lubricants. Although it is a CAFO inspection, a conscientious inspector will do a complete environmental examination of the farm operation.

Bring CAFO tasks under management

Just like your feeding, breeding or cropping programs, your CAFO compliance program is most effective when brought under management. Management simply means: 1) Determine what must be done; 2) Achieve results; 3) Through your own efforts and those of others. The objective is to have all CAFO tasks so much part of the farm routine that an inspection notice does not result in mailbox anxiety.

The first step to bring CAFO under management is to set SMART goals for each of the requirements of your permit. SMART defines characteristics of goals that make them effective: Specific, Measurable, Attainable, Rewarding and Timed. The most important of these is timed, because, as an old adage goes, "A goal without a deadline is nothing but a dream."

Maintaining the required records is probably the biggest task required by CAFO permits. "Record keeping on farms is always a challenge," says Jim

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FYI

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THE MANAGER

What is my plan for delivering more than promised or expected?

Success is when hard work meets opportunity. Planning is part of that hard work.

“In battle, plans are worthless, but I never go into battle without a plan,” Erven said quoting General Dwight Eisenhower.

If you don't know where you are going, any road will get you there. SWOT analysis to determine strengths, weaknesses, opportunities and threats greases the planning gears. A good plan today is better than a perfect plan tomorrow. The process of planning matters more than the plan.

How am I doing compared to how well I planned?

This is a measurement of results and deals with facts, not fiction.

What are my planned changes?

This is where the rubber meets the road. You need to clearly understand needed changes and take corrective action.

Unfreeze, Change, Refreeze. Unfreeze paves the way for a new habit or way of doing things. Change creates a new practice. Freeze

reinforces the new habit.

What is your list of needed changes for better accountability, he asked? What is your plan for improvement in the next 12 months? Life-learned tips for success:

1. Approach accountability as a happy challenge and an opportunity.
2. Enjoy helping other people, while helping yourself and the business.
3. Remember, unfreeze, freeze, refreeze as guidance for managing change.
4. Learn how to be more successful this year than you were in previous years.
5. Learn to balance career goals versus personal goals, work life versus family and personal life and self-interest versus helping others.
6. Learn to leave the need to know everything about everything to someone else.
7. Avoid the curse of excuses and blaming others to explain why change is impossible. The opportunity for you is there.

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Peck, a certified farm-environmental planner with 44 CAFO clients in New York. “It comes down to how high a priority it is. Some farms are very sophisticated with their records. Others, we just try to get it down on a sheet paper in the tractor.”

An example of a SMART record-keeping goal is: Manure and fertilizer application records are gathered and faxed to the consultant every Saturday morning before noon.

A SMART goal for inspections and maintenance tasks is: By September 1st, an at-a-glance system for tracking inspection/maintenance will be developed and hung in the employee break room.

SMART goals for other permit requirements should also be set. Involve others in management and key employees to develop CAFO compliance goals.

Determine what must be done

The next step is to develop a tactical plan to achieve CAFO goals. A tactical plan outlines the specific detailed actions to be taken. It answers four questions:

1. WHAT needs to be done?
2. WHO will do it?
3. WHEN will it get done?
4. HOW will it be done?

For the example of spreading records sent to the consultant, the WHATs may be:

- Ask crew to record manure loads.
- Develop spreading log with number of loads for each field.
- Put spreading log and field maps in each tractor.
- Assign person to gather logs and fax information.

The WHO, WHEN and HOW questions become evident once you logically work through all the WHAT questions. Repeat this process for each permit requirement goal. Have everyone involved in doing the work involved in developing the tactical plan.

Achieve results

To ensure your operation is moving toward its SMART goals, control plans must accompany the tactical plans. Control plans also ask four questions:

1. WHAT will be measured?
2. WHO and HOW will it be measured?
3. How OFTEN will it be measured?
4. WHEN will action be needed?

To follow through with our example, a control plan to check if records are sent to the consultant may be:

- Have consultant email when records are received.
- If reports fall more than two weeks behind, talk with appropriate employees.

“Every farm is different,” says Jim Peck. “And how they get things done are different. We can't put together one system that works for every farm.” It greatly helps to include trusted consultants as you develop your CAFO compliance program. They are familiar with plans on other farms and can help customize approaches specific for your operation.

Through your efforts and those of others

The most challenging part of managing is not setting goals, or developing plans, or ensuring that plans achieve the desired results. Rather, it's the people, all of them, from the part-time workers to the involved family owners. It is the ongoing interactions among people, and set of practices and procedures, that creates a workplace where everyone knows where the farm is headed and how their work contributes to get there.

It sounds so simple. But books upon books are written on the subject. All of them have one principle that stands true—involve people to set goals and develop plans so the importance of day-to-day tasks are recognized as a contribution to move the farm forward.

Apply this to CAFO and you have one less worry that can ruin a beautiful spring morning. ☐