



*A Professional Society Representing the Nation's Crop Production, Research Consultants and Quality Assurance Professionals*

## **WATERS OF THE U.S. (WOTUS) POSITION STATEMENT**

Members of the National Alliance of Independent Crop Consultants (NAICC) are independent agricultural consultants and researchers. Our members consult in 40 states on approximately 150 crops.

### **NAICC POSITION ON WOTUS**

The U.S. EPA has stated that their proposed changes to WOTUS will bring clarity and consistency to defining the scope of waters affected under the Clean Water Act. NAICC agrees that both clarity and consistency are needed but is concerned that the proposed changes revert back to earlier WOTUS regulations that were confusing and hindered the ability of private landowners to manage their land. The “Significant Nexus Standard” is particularly troubling and has the potential to put all U.S. waters in a category that allows for subjective determinations to be made by regulators and judges. Individuals and groups could tie-up implementation of good environmental practices, like Integrated Pest Management (IPM), for years through litigation with the Significant Nexus Standard. Any new regulations should provide a level of certainty while fostering shared cooperative responsibility for stewarding our precious water resources with the true environmentalists – the American farmer.