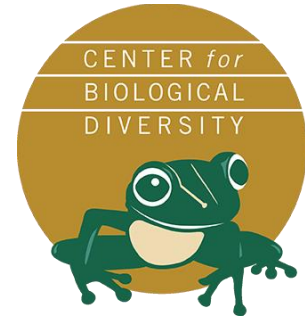




farmsanctuary



VIA REGULATIONS.GOV

June 21, 2021

Secretary Tom Vilsack  
U.S. Department of Agriculture  
Docket No. AMS-TM-21-0034  
1400 Independence Ave. SW  
Washington, DC 20250

Dr. Melissa R. Bailey  
Agricultural Marketing Service, USDA  
Room 2055-S, STOP 0201  
1400 Independence Ave. SW  
Washington, DC 20250

**Re: Comments on Notice of Request for Public Comment on Supply Chains for the Production of Agricultural Commodities and Food Products (AMS-TM-21-0034)**

**“Bolstering local and regional food systems, creating fairer and more competitive markets, meeting the needs of the agricultural workforce, supporting and promoting consumers’ nutrition security, particularly for low-income populations, addressing the needs of socially disadvantaged and small to mid-sized producers, and advancing efforts in other ways to transform the food system.”<sup>1</sup>**

Secretary Vilsack,

The Center for Biological Diversity and Farm Sanctuary, co-signed by farmer, worker, environment, health, and animal-centered groups including The Family Farm Action Alliance, Food Chain Workers Alliance, Regenerative Organic Alliance, Physicians Committee for Responsible Medicine, Wellness in the Schools, Slow Food USA, Friends of Family Farmers, the West End Revitalization Association, the ASPCA, The Humane Society of the United States and 77 other undersigned organizations, submit the following comments to the U.S. Department of Agriculture (USDA) on the agency’s efforts to “improve and reimagine the supply chains for

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<sup>1</sup> Press Release, USDA. (2021). *USDA Seeks Comments on Food System Supply Chains in Response to President Biden’s Executive Order to Support Resilient, Diverse, Secure Supply Chains*. <https://www.usda.gov/media/press-releases/2021/04/21/usda-seeks-comments-food-system-supply-chains-response-president>

the production, processing and distribution of agricultural commodities”<sup>2</sup> through the noticed *Supply Chains for the Production of Agricultural Commodities and Food Products*, 86 Fed. Reg. 20, 652 (Apr. 21, 2021). These organizations, which represent more than 19.9 million members and supporters, including thousands of farmers, 17,000 physicians, and 375,000 workers, strongly support USDA’s efforts “to tackle this supply chain holistically—looking across a full range of risks and opportunities . . . [to] position USDA to make long-term, transformative changes for economic, national, and nutritional security.”<sup>3</sup> Such efforts are essential to establish a more just, sustainable, resilient, and secure food system that equitably serves all communities in this country.

The U.S. food system supply chain creates immense, interconnected harms to people, animals, and our shared environment. Specifically, the U.S. food system:

- 1) Presents significant economic, health, and safety risks to farmers, farm workers, and farming communities.
- 2) Deepens local and global environmental crises, a stated Biden Administration national security priority.
- 3) Undermines regional food systems and household nutritional security.
- 4) Perpetuates systemic racism and other forms of inequity.

To address these challenges, USDA should:

- 1) **Invest in food that nourishes people.** Support sustainable and just forms of fruit, vegetable, legume, fungus, and grain production; *not* intensive livestock, poultry, and fish production; crops raised for animal feed; or other forms of extractive commodity crop production.
- 2) **Invest in a healthy public food safety net.** Support regional food systems, including by using schools, hospitals, food hubs, community kitchens, emergency food distributors, and other forms of “public food infrastructure” as hubs to connect farmers and families in need.
- 3) **Invest in farmers’ and farm workers’ interests, not in corporate profit margins.** Reduce corporate power over farmers and deconsolidate the food system.
- 4) **Invest in a just and sustainable future, not simply a less unjust or less unsustainable food system.** Prioritize source reduction strategies (those that eliminate waste or pollution before it is created) in pesticide and fertilizer use, greenhouse gas (GHG) emissions, and water consumption and reject factory farm gas (biogas) as being a false solution.

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<sup>2</sup> *Id.*

<sup>3</sup> *Id.*

The magnitude of the food system’s supply chain challenges—the ways it currently fails people, animals, and the planet—cannot be understated. Our planet faces a climate crisis<sup>4</sup> and a crisis of mass extinction.<sup>5</sup> In the United States, families face an epidemic of diet-related disease, the top cause of human death nationwide<sup>6</sup> and a cause of daily pain<sup>7</sup> for tens of millions of Americans.<sup>8</sup> United States farmers face significant financial and mental health burdens,<sup>9</sup> while U.S. farm workers and slaughterhouse workers labor in the most dangerous industry, by fatality rate, for less than a living wage.<sup>10</sup>

To support resilient, diverse, and secure supply chains, the food system supply chain must be assessed and reimaged using a comprehensive, holistic review process. The role of industrial animal agriculture as a core driver of food system GHG emissions, mass extinction, diet-related disease, global hunger, environmental racism, and farmer disempowerment is clear, indisputable, and grounded in the best-available scientific evidence.

Intensive animal agriculture is incompatible with a resilient and secure food system. A holistic approach to transforming the food system must recognize the current factory farming paradigm has failed. The food system can and should generate economic prosperity for farmers, farm workers, and farming communities. It can and should nourish all people in the United States. Today’s hyper-consolidated, global approach fails to create this shared, sustainable, and mutually

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<sup>4</sup> Cosorich, Matteo. (2021). *UN Climate Report a “red alert” for the planet: Guterres.* <https://news.un.org/en/story/2021/02/1085812>

<sup>5</sup> Center for Biological Diversity. *Halting the Extinction Crisis.* [https://doi.org/10.1073/pnas.1922686117](https://www.biologicaldiversity.org/programs/biodiversity/elements_of_biodiversity/extinction_crisis/index.html#:~:text=The%20current%20extinction%20crisis%20is,pushed%20nature%20to%20the%20brink; see also Ceballos, G., Ehrlich, P. R., & Raven, P. H. (2020). “Vertebrates on the brink as indicators of biological annihilation and the sixth mass extinction.” <i>Proceedings of the National Academy of Sciences</i>, 117(24), 13596–13602. <a href=); Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, Summary for Policymakers of the Global Assessment Report on Biodiversity and Ecosystem Services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, at 11-12 (2019), <https://ipbes.net/global-assessment> (“Human actions threaten more species with global extinction now than ever before. An average of around 25 per cent of species in assessed animal and plant groups are threatened, suggesting that around 1 million species already face extinction, many within decades, unless action is taken to reduce the intensity of drivers of biodiversity loss. Without such action, there will be a further acceleration in the global rate of species extinction, which is already at least tens to hundreds of times higher than it has averaged over the past 10 million years.”).

<sup>6</sup> Physicians Committee for Responsible Medicine. (2018). *Diet-Related Diseases are Leading Cause of Death in the U.S.* <https://www.pcrm.org/news/health-nutrition/diet-related-diseases-are-leading-cause-death-us>

<sup>7</sup> Elma, M., Yilmaz, S. T., Deliens, T., Coppieters, I., Clarys, P., Nijs, J., & Malfliet, A. (2020). “Do nutritional factors interact with chronic musculoskeletal pain? A systematic review.” *Journal of Clinical Medicine*, 9(3), 702. <https://doi.org/10.3390/jcm9030702>

<sup>8</sup> Science News. (2021). *One in Five American Adults Experience Chronic Pain.* <https://www.sciencedaily.com/releases/2021/04/210420092901.htm>

<sup>9</sup> American Farm Bureau Federation. (2019). *New National Poll Shows Impacts of Rural Economy on Farmer Mental Health.* <https://www.fb.org/newsroom/new-national-poll-shows-impacts-of-rural-economy-on-farmer-mental-health>

<sup>10</sup> Wurth, M. (2019). *Children Working in Terrifying Conditions in US Agriculture.* Human Rights Watch, <https://www.hrw.org/news/2019/11/13/children-working-terrifying-conditions-us-agriculture#> see also U.S. Bureau of Labor Statistics. (2020). *A Look at Workplace Safety in Agriculture.* <https://www.bls.gov/opub/ted/2020/a-look-at-workplace-safety-in-agriculture.htm> ; Farmworker Justice. (2019). *Selected Statistics on Farmworkers (2015-16 Data).* <http://www.farmworkerjustice.org/wp-content/uploads/2019/05/NAWS-Data-FactSheet-05-13-2019-final.pdf>

beneficial prosperity. The food system must shift to center people’s well-being and the environment. It must shift to a food system organized by principles of sustainability and justice.

## **I. THE PROBLEM**

### **a. The Current Food System is a Source of Risk, Resulting in Barriers to Household Food Security, Increasing Future Pandemic Risk, and Deepening the Global Environmental Crisis**

A resilient food system is critical to national security. Yet, as the COVID-19 pandemic laid bare, the U.S. food system, as currently conceived, is subject to catastrophic breakdown and threatens the immediate well-being of millions of Americans. It is also deeply unsustainable, driving GHG emissions, deforestation and other destructive forms of land-use transformation, and unsustainable resource consumption. Intensive animal agriculture embodies and drives many of the least sustainable, highest-risk components of the food system supply chain.

The pandemic exacerbated pre-existing barriers to universal food security. In the first weeks of the pandemic, long lines at food pantries dominated news coverage. In 2020, an estimated 1-in-4 children faced hunger.<sup>11</sup> Children of color were twice as likely to report hunger,<sup>12</sup> and even prior to the pandemic faced “food insecurity” at near-pandemic levels.<sup>13</sup> Yale University’s Jacob Hacker identified barriers to nutritional food access as part of a wider “great risk shift,” undermining traditional sources of stability and “Americans’ access to the American Dream.”<sup>14</sup> The food system supply chain should represent a source of security, not risk, for all families in the U.S.

U.S. farmers, farm workers, slaughterhouse workers, and other low-wage workers bear significant risks. The pandemic both elevated and deepened these risks. In the first months of the pandemic, slaughterhouse bottlenecks made headlines, causing the consumer price of beef to increase by 10% even as the wholesale price of beef fell to record lows.<sup>15</sup> This moment of extreme pressure highlights a long-term trend.<sup>16</sup> Farmers earn a smaller share of every food dollar every year. For slaughterhouse workers, the bottlenecks had been caused by a deadly mix of unsafe and unsanitary working conditions in slaughterhouses, an economic system that exploits farm workers and slaughterhouse workers, and a legal system that keeps their suffering in the shadows. Across the supply chain, food system workers were deemed necessary but

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<sup>11</sup> No Kid Hungry. (2020). *1 in 4 Kids Could Face Hunger*. <https://www.nokidhungry.org/blog/1-4-kids-could-face-hunger>

<sup>12</sup> Gamblin, M.D., & King, K.. *Racially Equitable Responses to Hunger During COVID-19 and Beyond: A Bread for the World Institute Special Report*. [https://bread.org/sites/default/files/downloads/racially-equitable-responses-to-hunger-during-covid-19-january-2021.pdf?\\_ga=2.50748205.525654942.1620930886-492111182.1620657426](https://bread.org/sites/default/files/downloads/racially-equitable-responses-to-hunger-during-covid-19-january-2021.pdf?_ga=2.50748205.525654942.1620930886-492111182.1620657426)

<sup>13</sup> As noted in this comment, current food access language reflects and perpetuates systemic racism. A review of food access language should be part of a holistic review of the existing supply chain.

<sup>14</sup> Hacker, J. *The Great Risk Shift: The New Economic Insecurity and the Decline of the American Dream*. <https://politicalscience.yale.edu/publications/great-risk-shift-new-economic-insecurity-and-decline-american-dream>

<sup>15</sup> U.S. Bureau of Labor Statistics. (2020). *The impact of the COVID-10 Pandemic on Food Price Indexes and Data Collection*. <https://www.bls.gov/opub/mlr/2020/article/the-impact-of-the-covid-19-pandemic-on-food-price-indexes-a>

<sup>16</sup> United States Department of Agriculture Economic Research Service. Food Dollar Series. <https://www.ers.usda.gov/data-products/food-dollar-series/>

expendable, asked to work to ensure families across the country could eat nourishing food that they could not afford to eat themselves, as they worked for below-living wages.<sup>17</sup>

The COVID-19 pandemic exposed systemic weaknesses that must be addressed through transformative policy. The government response illustrated the inadequacy of today's unjust and unsustainable agriculture policy agenda. The bailouts, like the wider commodity agriculture subsidy program, supported million-dollar farms and corporations in heavily consolidated, global markets over farmers and families. The Environmental Working Group found that of the nearly \$50 billion in emergency agricultural payments, 80% went to the largest 20% of farms.<sup>18</sup> Like the Farm Crisis of the 1980's and the Great Recession, the COVID-19 emergency response policies are hastening consolidation and exacerbate the nation's family farm crisis.<sup>19</sup>

Industrial animal agriculture makes the next pandemic more likely. Three in four emerging infectious diseases come from animal-human interactions.<sup>20</sup> These transmissions occur through a process known as "spillover." As a result of improved public health and hygiene, spillover had decreased during much of the 20<sup>th</sup> century only to intensify again in recent years.<sup>21</sup>

Industrial animal agriculture deepens zoonotic spillover through at least two mechanisms. First, it increases the number of animals that any one human can contact during the food production process. Second, it increases human-animal and domestic-wild animal contact through deforestation and land-use change, both of which drive wildlife from their native habitats, accelerating mass extinction and zoonotic spillover including increased direct disease transmission.

This is not a hypothetical concern—the H1N1 "Swine Flu" pandemic was likely caused by industrial hog farming.<sup>22</sup> Today, industrial agriculture and live-animal export markets remain

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<sup>17</sup> Corchado, A. (2020). *A Former Farmworker on American Hypocrisy*. The New York Times. <https://www.nytimes.com/2020/05/06/opinion/sunday/coronavirus-essential-workers.html> see also Blesener, S. (2020). *When Stocking Grocery Shelves Turns Dangerous*. <https://www.nytimes.com/2020/03/20/business/coronavirus-grocery-stores-workers.html>

<sup>18</sup> Environmental Working Group. (2020). *New USDA Records Show Trade Bailout and Coronavirus Payments Went to the Largest Farms*. <https://www.ewg.org/news-insights/news/new-usda-records-show-trade-bailout-and-coronavirus-payments-went-largest-farms>

<sup>19</sup> MacDonald, J. M., Hoppe, R. A., & Newton, D. (2018). *Three Decades of Consolidation in U.S. Agriculture*. United States Department of Agriculture Economic Research Service.

<https://www.ers.usda.gov/webdocs/publications/88057/eib-189.pdf> see also Charles, D. (2020). *Farmers Got a Government Bailout in 2020, Even Those Who Didn't Need It*. National Public Radio. <https://www.npr.org/2020/12/30/949329557/farmers-got-a-government-bailout-in-2020-even-those-who-didnt-need-it>

<sup>20</sup> Centers for Disease Control and Prevention. *Zoonotic Diseases*. <https://www.cdc.gov/onehealth/basics/zoonotic-diseases.html>

<sup>21</sup> Rohr, J. R., Barrett, C. B., Civitello, D. J., Craft, M. E., Delius, B., DeLeo, G. A., Hudson, P. J., Jouanard, N., Nguyen, K. H., Ostfeld, R. S., Remais, J. V., Riveau, G., Sokolow, S. H., & Tilman, D. (2019). "Emerging human infectious diseases and the links to global food production." *Nature Sustainability*, 2(6), 445–456. <https://doi.org/10.1038/s41893-019-0293-3>

<sup>22</sup> Tuckman, J. (2010). *La Gloria, Swine Flu's Ground Zero, is Left with Legacy of Anger*. The Guardian. <https://www.theguardian.com/world/2010/apr/23/swine-flu-legacy-la-gloria>

critical sources of pandemic risk.<sup>23</sup> In 2018, animal agriculture used almost 26 million pounds of antibiotics, 52% of which were antibiotics important to human health.<sup>24</sup> Using antibiotics in this way can lead to drug-resistant bacteria; as a result, certain bacterial infections have already become or are on their way to becoming untreatable in humans. Antibiotic-resistant infections kill an estimated 35,000 Americans every year.<sup>25</sup>

The harms caused by subsidized monoculture animal feed illustrate how the intensive animal agriculture supply chain threatens local and global environments as well as diminishes U.S. capacity to nourish its people. Crops grown for animal feed now cover one-third of the Earth's land mass, often in ways that release pesticides and fertilizers into freshwater and hasten soil erosion.<sup>26</sup> This land, if used to grow fruits, vegetables, legumes, fungi, and sustainably-stewarded grains, could nourish many more people than the current system.<sup>27</sup>

Like the pandemic, climate change represents a clear threat to national and human security. Today's food system drives unsustainable GHG emissions, changes in land-use, and resource consumption. One-third of global GHG emissions comes from the food system.<sup>28</sup> Monoculture animal feed crop production alone causes approximately 6.5% of all anthropogenic global GHG emissions.<sup>29</sup> 80% of deforestation in the Amazon serves cattle farming.<sup>30</sup> The beef industry causes 83% of land-use transformation in agriculture, a critical accelerant in mass species

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<sup>23</sup> Jones, B. A., Grace, D., Kock, R., Alonso, S., Rushton, J., Said, M. Y., McKeever, D., Mutua, F., Young, J., McDermott, J., & Pfeiffer, D. U. (2013). "Zoonosis emergence linked to agricultural intensification and environmental change." *Proceedings of the National Academy of Sciences of the United States of America*, 110(21), 8399–8404. <https://doi.org/10.1073/pnas.1208059110>

<sup>24</sup> U.S. Food and Drug Administration Center for Veterinary Medicine. (2019). *2018 Summary Report on Antimicrobials Sold or Distributed Use in Food-Producing Animals*. <https://www.fda.gov/media/133411/download>

<sup>25</sup> Centers for Disease Control and Prevention. *Antibiotic/Antimicrobial Resistance: Biggest Threats and Data*. [https://www.cdc.gov/drugresistance/biggest-threats.html?deliveryName=USCDC\\_426-DHQP-DM12788](https://www.cdc.gov/drugresistance/biggest-threats.html?deliveryName=USCDC_426-DHQP-DM12788)

<sup>26</sup> Carrington, D., Kommenda, N., Gutiérrez, P., Levett, C. (2018). *One Football Pitch of Forest Lost Every Second in 2017, Data Reveals*. The Guardian. <https://www.theguardian.com/environment/ng-interactive/2018/jun/27/one-football-pitch-of-forest-lost-every-second-in-2017-data-reveals> see also Khokhar, T., & Tabary, Mahyar Eshragh. (2016). *Five Forest Figures for the International Day of Forests*. World Bank Blogs.

<https://blogs.worldbank.org/opendata/five-forest-figures-international-day-forests>; Sewell, C. (2020). *Removing the Meat Subsidy: Our Cognitive Dissonance Around Animal Agriculture*. Columbia Journal of International Affairs.

<https://jia.sipa.columbia.edu/removing-meat-subsidy-our-cognitive-dissonance-around-animal-agriculture>

<sup>27</sup> Shepon, A., Eshel, G., Noor, E., & Milo, R. (2018). "The opportunity cost of animal based diets exceeds all food losses." *Proceedings of the National Academy of Sciences*, 115(15), 3804–3809. <https://doi.org/10.1073/pnas.1713820115>

<sup>28</sup> Crippa, M., Solazzo, E., Guizzardi, D. et al. (2021). "Food systems are responsible for a third of global anthropogenic GHG emissions." *Nat Food* 2, 198–209. <https://doi.org/10.1038/s43016-021-00225-9>

<sup>29</sup> Food and Agriculture Organization of the United Nations. *Key Facts and Findings*.

<http://www.fao.org/news/story/en/item/197623/icode/#:~:text=Opportunities%20to%20reduce%20greenhouse%20gas,all%20species%2C%20in%20all%20regions.&text=Total%20emissions%20from%20global%20livestock,of%20all%20anthropogenic%20GHG%20emissions.&text=Manure%20storage%20and%20processing%20represent%2010%20percent>

<sup>30</sup> Nepstad, D. C., Stickler, C. M., Filho, B. S., & Merry, F. (2008). "Interactions among Amazon land use, forests and climate: prospects for a near-term forest tipping point." *Philosophical Transactions of the Royal Society B: Biological Sciences*, 363(1498), 1737–1746. <https://doi.org/10.1098/rstb.2007.0036>



extinction.<sup>31</sup> The global food system accounts for up to 92% of humans’ “freshwater footprint.”<sup>32</sup> Each of these challenges interconnect and compound, causing immense human harm and disproportionately burdening the systemically oppressed in the United States and around the world.

In the words of Dr. Jane Goodall, “We are all interconnected, people, animals, our environment. When nature suffers, we suffer. And when nature flourishes, we all flourish.”<sup>33</sup> According to Justice J. Harvey Wilkinson, a Republican-appointed judge in North Carolina, intensive animal agriculture acts as a barrier to this shared flourishing. In his words,

What was missing [from the industrial animal agricultural producers] was the recognition that treating animals better will benefit humans. What was neglected is that animal welfare and human welfare, far from advancing at cross-purposes, are actually integrally connected. The decades-long transition to [CAFOs] lays bare this connection, and the consequences of its breach, with startling clarity.<sup>34</sup>

### *Intensive Animal Agriculture Acts as a Critical Barrier to Sustainable Food System Stewardship*

Climate policies will not succeed if USDA continues to ignore the significant GHG contributions from animal agriculture. Animal agriculture is a major driver of climate change, producing an estimated 14.5-25% of all GHG emissions globally.<sup>35</sup>

Methane and nitrous oxide are the two primary GHGs produced by animal agricultural operations that are of the greatest concern due to higher potency. Domestically, between 1990 and 2019 total GHG releases attributable to manure management practices alone rose by a total of 60.3%—equivalent to a 68% increase in methane emissions and a 40.2% increase in nitrous

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<sup>31</sup> Poore, J., & Nemecek, T. (2018). “Reducing food’s environmental impacts through producers and consumers.” *Science*, 360(6392), 987–992. <https://doi.org/10.1126/science.aag0216>

<sup>32</sup> Gerbens-Leenes, P., Mekonnen, M., & Hoekstra, A. (2013). “The water footprint of poultry, pork and beef: A comparative study in different countries and production systems.” *Water Resources and Industry*, 1–2, 25–36. <https://doi.org/10.1016/j.wri.2013.03.001>

<sup>33</sup> National Center for Women and Information Technology. (2020). “*Change Leadership: A Call for Courageous Action*” with Dr. Jane Goodall. <https://www.ncwit.org/video/change-leadership-call-courageous-action-dr-jane-goodall-video-playback#:~:text=People%2C%20animals%2C%20our%20environment,.make%20that%20world%20a%20reality.>

<sup>34</sup> *McKiver v. Murphy-Brown, LLC*, No. 19-1019, 2020 WL 6787917, at \*29 (4th Cir. Nov. 19, 2020); see also Yeoman, B. (2020). ‘Suffocating closeness’: US judge condemns ‘appalling conditions’ on industrial farms. *The Guardian*. <https://www.theguardian.com/environment/2020/nov/20/suffocating-closeness-us-judge-condemns-appalling-conditions-on-industrial-farms>

<sup>35</sup> United National Environment Programme. (2012). *Growing Greenhouse Gas Emissions Due to Meat Production*. [http://www.unep.org/pdf/unep-geas\\_oct\\_2012.pdf](http://www.unep.org/pdf/unep-geas_oct_2012.pdf); see also Gerber, P.J., et al. (2013). *Tackling climate change through livestock – A global assessment of emissions and mitigation opportunities*. Food and Agriculture Organization of the United Nations. <http://www.fao.org/3/i3437e.pdf>; Food & Agriculture Organization of the United Nations. (2006). *Livestock’s Long Shadow: Environmental Issues and Options*. <http://www.fao.org/docrep/010/a0701e/a0701e00.HTM>; Machovina, et al.. (2015). *Biodiversity Conservation: The Key is Reducing Meat Consumption*. 536 *Science of the Total Environment* 419, 424. [http://www.cof.orst.edu/leopold/papers/Machovina\\_2015.pdf](http://www.cof.orst.edu/leopold/papers/Machovina_2015.pdf); European Commission Emissions Database for Global Atmospheric Research. *Food*. [https://edgar.jrc.ec.europa.eu/edgar\\_food](https://edgar.jrc.ec.europa.eu/edgar_food)

oxide emissions.<sup>36</sup> As it relates to nitrous oxide, manure management ranks nationally as its third highest source, just behind agricultural soil management and stationary combustion.<sup>37</sup> With methane, the gases from the animals themselves aggregated constitute the second largest anthropogenic source of methane emissions in the United States; when combined with manure management, that amount accounts for 36% of all human-induced methane emissions—the largest domestic source of methane of any industry.<sup>38</sup>

According to the 2021 United Nations Global Methane Assessment, “cutting human-caused methane by 45% this decade would keep warming beneath a threshold agreed by world leaders.”<sup>39</sup> Livestock and fossil fuels, according to the report, are the top two causes of methane. According to the National Oceanic and Atmospheric Administration (NOAA), “despite pandemic shutdowns . . . methane surged in 2020. NOAA’s preliminary analysis showed the annual increase in atmospheric methane for 2020 was 14.7 parts per billion (ppb), which is the largest annual increase recorded since systematic measurements began in 1983.”<sup>40</sup>

Overall, the top 20 meat and dairy companies together release more GHGs than Germany (933mt v. 902mt), a top four global economy by size.<sup>41</sup> However, no federal standards have been put in place to meaningfully reduce these emissions. The United States cannot achieve its climate goals without addressing and reversing emission trends of methane and nitrous oxide emissions from animal agriculture.

#### **b. Today’s Consolidated, Global Supply Chain Hurts U.S. Farmers, Workers, Farming Communities, and Families**

In 2020, the Rockefeller Foundation described the food system as “[dependent] on hyper-specialized, vertically integrated supply chains designed to serve global markets.”<sup>42</sup> In other words, a few exceedingly powerful corporations have organized the food system to maximize their profits over people’s well-being. This power hurts farmers, farm workers, farming

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<sup>36</sup> Environmental Protection Agency. (2021). *Inventory of US Greenhouse Gas Emissions and Sinks: 1990-2019*, EPA 430-R-21-005 at ES-18, 2-23, 5-12. <https://www.epa.gov/sites/production/files/2021-04/documents/us-ghg-inventory-2021-main-text.pdf>. *Id.* at ES-6; *see also id.* at ES-20; Food & Agriculture Organization of the United Nations. (2006). *Livestock’s Long Shadow: Environmental Issues and Options*, at xxi. <ftp://ftp.fao.org/docrep/fao/010/a0701e/a0701e.pdf>.

<sup>37</sup> *Id.* at ES-6; *see also id.* at ES-20; Food & Agriculture Organization of the United Nations. (2006). *Livestock’s Long Shadow: Environmental Issues and Options*, at xxi. <ftp://ftp.fao.org/docrep/fao/010/a0701e/a0701e.pdf>.

<sup>38</sup> Environmental Protection Agency. (2021). *Inventory of US Greenhouse Gas Emissions and Sinks: 1990-2019*, EPA 430-R-21-005 at ES\_9, ES\_16 ; National Association of Local Boards of Health. (2010). *Understanding Concentrated Animal Feeding Operations and Their Impacts on Community Health*, 7. [https://www.cdc.gov/nceh/ehs/docs/understanding\\_cafos\\_nalboh.pdf](https://www.cdc.gov/nceh/ehs/docs/understanding_cafos_nalboh.pdf).

<sup>39</sup> UN Environment Programme. (2021). *Global Methane Assessment: Benefits and Costs of Mitigating Methane Emissions*. <https://www.unep.org/resources/report/global-methane-assessment-benefits-and-costs-mitigating-methane-emissions>

<sup>40</sup> National Oceanic and Atmospheric Administration. (2021). *Despite Pandemic Shutdowns, Carbon Dioxide and Methane Surged in 2020*. <https://research.noaa.gov/article/ArtMID/587/ArticleID/2742/Despite-pandemic-shutdowns-carbon-dioxide-and-methane-surged-in-2020>

<sup>41</sup> Institute for Agriculture and Trade Policy. (2018). *Emissions Impossible: How Big Meat and Dairy Are Heating Up the Planet*. <https://www.iatp.org/sites/default/files/2018-08/Emissions%20impossible%20EN%2012.pdf>.

<sup>42</sup> The Rockefeller Foundation. (2020). *Reset the Table: Meeting the Moment to Transform the U.S. Food System*. [https://www.rockefellerfoundation.org/wp-content/uploads/2020/07/RF-FoodPolicyPaper\\_Final2.pdf](https://www.rockefellerfoundation.org/wp-content/uploads/2020/07/RF-FoodPolicyPaper_Final2.pdf)



communities, and consumers. It also undermines the market as a vehicle for competition and opportunity generation. As evidence:

**The food system is heavily consolidated.** Economists have identified that abuses are more likely in markets where the “Big 4” enjoy at least 40% market share.<sup>43</sup> Globally, farm equipment (45%), seeds (50%), animal pharmaceuticals (58%), and agrochemicals (65%), exceed economists’ threshold for abuse. Within the U.S., 14 industries meet this standard, including chicken processing (54%), pork processing (67%), beef processing (73%), and soybean processing (80%).<sup>44,45</sup>

**Land and market consolidation make it difficult for small and medium-sized farms to compete. Smaller producers often rely on off-farm income to survive.**<sup>46</sup> In 2018, farmers with less than \$350,000 in sales, whose primary occupation was farming, had a median net farm income of -\$1,524.<sup>47</sup> As of 2015, 90% of all farmers earned less than \$350,000 in gross farm income.<sup>48</sup> However, the share of these small farms’ contribution to the U.S. food system has fallen in recent decades. In 1991, small farms produced approximately half of U.S. food. Today, they produce about one-quarter of U.S. food.<sup>49</sup>

**Consolidation deepens barriers to land access and ownership, critical vehicles of intergenerational wealth creation.** From 1994-2013, The National Council of Real Estate Investment Fiduciaries and The Economist found that U.S. farmland rose in price more than most other asset classes, significantly outpacing other types of U.S. property and the S&P 500.<sup>50</sup> In Iowa, the price of farmland from 1970-2020 increased by more than 1700%—about three and

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<sup>43</sup> Hendrickson, M. K., Howard, P. H., Miller, E. M., Constance, D. H. (2020). *The Food System: Concentration and its Impacts, A Special Report to the Family Farm Action Alliance*, pg. 3. <https://farmactionalliance.org/wp-content/uploads/2020/11/Hendrickson-et-al.-2020.-Concentration-and-Its-Impacts-FINAL.pdf>

<sup>44</sup> *Id.* at 4.

<sup>45</sup> In May 2021, Family Farm Action Alliance released an addendum to "The Food System" that reports higher levels of market concentration for steers and heifers (85%), hogs (70%), and broiler (54%) processing. [https://farmactionalliance.org/wp-content/uploads/2021/05/Hendrickson-et-al.-2020.-Concentration-and-Its-Impacts\\_FINAL\\_Addended.pdf](https://farmactionalliance.org/wp-content/uploads/2021/05/Hendrickson-et-al.-2020.-Concentration-and-Its-Impacts_FINAL_Addended.pdf)

<sup>46</sup> United States Department of Agriculture Economic Research Service. *Farming and Farm Income*.

<https://www.ers.usda.gov/data-products/ag-and-food-statistics-charting-the-essentials/farming-and-farm-income/>

<sup>47</sup> Hendrickson, M. K., Howard, P. H., Miller, E. M., Constance, D. H. (2020). *The Food System: Concentration and its Impacts, A Special Report to the Family Farm Action Alliance*, pg. 17. <https://farmactionalliance.org/wp-content/uploads/2020/11/Hendrickson-et-al.-2020.-Concentration-and-Its-Impacts-FINAL.pdf>

<sup>48</sup> United States Department of Agriculture Economic Research Service. *Farming and Farm Income*.

[https://www.ers.usda.gov/data-products/ag-and-food-statistics-charting-the-essentials/farming-and-farm-income/#:~:text=Small%20family%20farms%20\(less%20than,of%20the%20value%20of%20production](https://www.ers.usda.gov/data-products/ag-and-food-statistics-charting-the-essentials/farming-and-farm-income/#:~:text=Small%20family%20farms%20(less%20than,of%20the%20value%20of%20production)

<sup>49</sup> MacDonald, J. M. & Hoppe, R. A. (2017). *Large Family Farms Continue to Dominate U.S. Agricultural Production*. United States Department of Agriculture Economic Research Service. <https://www.ers.usda.gov/amber-waves/2017/march/large-family-farms-continue-to-dominate-us-agricultural-production/>

<sup>50</sup> The Economist. (2014). *Barbarians at the Farm Gate*. <https://www.economist.com/finance-and-economics/2014/12/30/barbarians-at-the-farm-gate>

a half times faster than the rate of inflation.<sup>51</sup> These increases in the cost of land have led to an increase in land rental relationships. Today, nearly 40% of U.S. farmland is rented to operators.<sup>52</sup>

Trends in land consolidation and barriers to land ownership disproportionately burden farmers who identify as Black, Indigenous, or other People of Color (BIPOC). In total, 90% of Black-owned agricultural land has been taken over the last century, usually through foreclosure as a direct consequence of unequal lending practices.<sup>53</sup> According to economists, inheritance is the single greatest contributor to the racial wealth gap, exceeding all other socioeconomic indicators including income.<sup>54</sup> For middle class families, land (usually in the form of a house) represents the single most significant form of inheritance. Agricultural land, therefore, is an underrecognized factor in the broader racial wealth gap.<sup>55</sup>

**Within animal agriculture, the typical U.S. farm is now a Concentrated Animal Feeding Operation (CAFO), also known as a factory farm.** From 1987-2017, the median-sized hog farm increased from 1,200 hogs sold/year to 51,300; the dairy herd midpoint increased from 80 to 1,300 cows.<sup>56</sup>

**CAFOs pollute the water and air, harm biodiversity, and threaten the basic rights of neighboring communities.** Wisconsin Administrative Law Judge Jeffery Boldt referred to current water protections as a “massive regulatory failure,” responding to the significant increase in CAFOs in the state. This regulatory failure results from both the toxicity of factory farming and the extent to which its effects go unregulated and even unmeasured. CAFOs produce a variety of noxious air pollutants, including ammonia, hydrogen sulfide, volatile organic compounds, particulate matter, and the greenhouse gases methane and nitrous oxide.<sup>57</sup> A recent study found air pollution from food production kills approximately 16,000 people every year,

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<sup>51</sup> Iowa State University Extension and Outreach. (2020). *2020 Farmland Value Survey*.

<https://www.extension.iastate.edu/agdm/wholefarm/html/c2-70.html>

<sup>52</sup> United States Department of Agriculture Economic Research Service. *Farmland Ownership and Tenure*.

<https://www.ers.usda.gov/topics/farm-economy/land-use-land-value-tenure/farmland-ownership-and-tenure/#:~:text=A%20majority%20of%20U.S.%20land,farm%20crisis%20of%20the%201980s>

<sup>53</sup> Gilbert, J., Wood, S.D., Sharp, W. (2002). Who Owns the Land? Agricultural Land Ownership by Race/Ethnicity. *Rural America*. Volume 17 Issue 4.

[https://www.ers.usda.gov/webdocs/publications/46984/19353\\_ra174h\\_1\\_.pdf?v=0](https://www.ers.usda.gov/webdocs/publications/46984/19353_ra174h_1_.pdf?v=0)

<sup>54</sup> Darity, W., Hamilton, D., Paul, M., Aja, A., Price, A., Moore, A., & Chiopris, C., (2018). *What We Get Wrong About Closing the Racial Wealth Gap*. Duke University Samuel DuBois Cook Center on Social Equity.

<https://socialequity.duke.edu/wp-content/uploads/2019/10/what-we-get-wrong.pdf>

<sup>55</sup> *Id.*

<sup>56</sup> *Id.* at 4.

<sup>57</sup> See, e.g., Copeland, C. (2014). *Air Quality Issues and Animal Agriculture: A Primer*. Congressional Research Service, Report No. RL32948. <http://nationalaglawcenter.org/wp-content/uploads/assets/crs/RL32948.pdf>; Iowa State University and the University of Iowa Study Group. (2002). *Concentrated Animal Feeding Operations Air Quality Study; Final Report*.

<https://www.iowadnr.gov/Portals/idnr/uploads/air/environment/afo/Iowa%20CAFO%20Air%20Quality%20study.pdf>

; Hribar, C. (2010). *Understanding Concentrated Animal Feeding Operations and Their Impact on Communities*. National Association of Local Boards of Health, pg. 6.

[http://www.cdc.gov/ncet/ehs/Docs/Understanding\\_CAFOS\\_NALBOH.pdf](http://www.cdc.gov/ncet/ehs/Docs/Understanding_CAFOS_NALBOH.pdf)

12,700 (or 80%) of whom are attributed to pollution from animal agriculture.<sup>58</sup> If the CDC accounted for farming pollution as its own cause of death in the United States, it would rank in the top 30.

This pollution also harms biodiversity by degrading habitats and directly affecting wildlife populations. For example, in North Carolina the Carolina madtom fish and the Neuse River waterdog salamander have been listed as endangered and threatened species under the Endangered Species Act respectively because of pollution to their habitat by CAFOs.<sup>59</sup> As detailed by the U.S. Fish and Wildlife Service, “[t]he main impacts to the Neuse River waterdog and Carolina madtom from agricultural practices . . . are caused by nutrient and chemical pollution . . . . Fertilizers and animal manure, which are both rich in nitrogen and phosphorus, are the primary sources of nutrient pollution from agricultural sources . . . . Confined animal feeding operations and feedlots can cause degradation of aquatic ecosystems and may cause direct effects to species (e.g., death resulting from hypoxia), primarily because of manure management issues. Fertilized soils, manure, and livestock can be significant sources of nitrogen-based compounds like ammonia and nitrogen oxides.”<sup>60</sup>

**Factory farms violate communities’ civil liberties.** These environmental toxins are a form of environmental racism. In North Carolina, Black, Indigenous, and those identifying as Hispanic or Latino are 54%, 39%, and 118% more likely than white communities to live near a CAFO.<sup>61</sup> According to a civil rights complaint filed against the state of North Carolina by the North Carolina Environmental Justice Network, Rural Empowerment Association for Community Help, and Waterkeeper Alliance, “[i]ndustrial swine facilities in North Carolina . . . operate with grossly inadequate and outdated systems of controlling animal waste and little provision for government oversight, which has an unjustified disproportionate impact on the basis of race and national origin against African Americans, Latinos and Native Americans in violation of Title VI of the Civil Rights Act of 1964.”<sup>62</sup>

**When given the chance, farming communities reject factory farms.** Environmental justice, animal advocacy, and public health experts agree: factory farms create significant environmental,

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<sup>58</sup> Domingo, N. N. G., Balasubramanian, S., Thakrar, S. K., Clark, M. A., Adams, P. J., Marshall, J. D., Muller, N. Z., Pandis, S. N., Polasky, S., Robinson, A. L., Tessum, C. W., Tilman, D., Tschofen, P., & Hill, J.D. (2021). “Air quality-related health damages of food.” *Proceedings of the National Academy of Sciences*, 118 (20). <https://doi.org/10.1073/pnas.2013637118>

<sup>59</sup> Fish and Wildlife Service. *Endangered and Threatened Wildlife and Plants: Threatened Species Status with Section 4(d) Rule for Neuse River Waterdog and Endangered Species Status for Carolina Madtom and Proposed Designations of Critical Habitat*, 84 Fed. Reg. 23,644, 23,649 (May 22, 2019); see generally Fish and Wildlife Service. *Endangered and Threatened Wildlife and Plants: Threatened Species Status with Section 4(d) Rule for Neuse River Waterdog and Endangered Species Status for Carolina Madtom and Designations of Critical Habitat*, 86 Fed. Reg. 30688 (June 9, 2021) (listing the Neuse River waterdog and Carolina madtom as threatened and endangered respectively under the Endangered Species Act).

<sup>60</sup> Fish and Wildlife Service. *Endangered and Threatened Wildlife and Plants: Threatened Species Status with Section 4(d) Rule for Neuse River Waterdog and Endangered Species Status for Carolina Madtom and Designations of Critical Habitat*, 86 Fed. Reg. 30688, 30701 (June 9, 2021).

<sup>61</sup> Ball-Blakely, C., *CAFOs: Plaguing North Carolina Communities of Color*. <https://aldf.org/wp-content/uploads/2018/06/CAFOs-Plaguing-North-Carolina-Communities-of-Color.pdf>

<sup>62</sup> Earthjustice. (2014). *Re: Complaint Under Title VI of the Civil Rights Act of 1964*.

<https://earthjustice.org/sites/default/files/files/North-Carolina-EJ-Network-et-al-Complaint-under-Title-VI.pdf>

animal, and human harms. In 2010, Iowa repealed its laws granting local control to communities. Since then, the number of CAFOs has increased by more than 1900%.<sup>63</sup> According to small Iowa farmer Gordon Garrison, who is currently suing a nearby operation with 4,400 hogs (well under the national median), “They’re using me for a waste disposal site.”<sup>64</sup> In September 2020, approximately 300 local, state, and national advocacy organizations representing millions of constituents “urge[d] quick passage” of the Farm System Reform Act as a response to factory farming’s negative economic, environmental, and health effects on farmers, farm workers, and farming communities.<sup>65</sup>

**Farming communities are losing their land to foreign investors.** As of 2017, 26.7 million acres of U.S. agricultural land were held by foreign investors, more than double ten years’ prior.<sup>66</sup> Today, foreign actors own enough farmland to cover the entire state of Ohio.<sup>67</sup>

**The current system raises prices on consumers without benefiting farmers.** Profits in the food system go to the corporate integrators largely involved in seed, chemical production, and agricultural product processing. From 1999-2019, farmers’ share of the food dollar decreased by 9%.<sup>68</sup> This was deepened by temporary bottlenecks. For beef in June 2020, for example, the consumer price of beef rose by more than 10% even as the wholesale price fell.<sup>69</sup> In many rural communities, low-income farmers are left without reliable access to the nourishing food they help produce.

**The modern “grocery gap” stems from corporate consolidation.** Systemic barriers to access healthy, sustainable food in marginalized communities across the U.S. result from corporate consolidation and structural injustices, creating a “food apartheid,” according to Karen Washington.<sup>70</sup> This “food apartheid” language better reflects both the challenges facing systemically oppressed communities in the United States and the communities’ capabilities, in contrast with the USDA’s current “food desert” language.

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<sup>63</sup> Ahl, J. (2019). *Missouri CAFO Law Goes Into Effect, Regulation Moves from Local to State Control*, National Public Radio. <https://news.stlpublicradio.org/government-politics-issues/2019-09-16/missouri-cafo-law-goes-into-effect-regulation-moves-from-local-to-state-control>

<sup>64</sup> Flesher, J. (2020). *Factory Farms Provide Abundant Food, but Environment Suffers*. The Associated Press. <https://apnews.com/article/mo-state-wire-in-state-wire-ia-state-wire-mi-state-wire-iowa-85466c302a7436070b913ae071b16a>

<sup>65</sup> Waterkeeper Alliance. (2020). *300 Diverse Advocacy Groups Endorse the Farm System Reform Act and Urge Quick Passage in Congress*. <https://waterkeeper.org/news/300-diverse-advocacy-groups-endorse-the-farm-system-reform-act-and-urge-quick-passage-in-congress/>

<sup>66</sup> Bocci, M., Larson, K., & Wu, P. (2018). *Acquisition and Dispositions of U.S. Agricultural Land by Foreign Investors: Federal and State Legislative Restrictions, Limitations, and Disclosure Requirements*. Drake Journal of Agricultural Law. *see also* United States Department of Agriculture. *Inventoried Roadless Area Acreage Categories of NFS Lands Summarized by State*. [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fsm8\\_037652.htm](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsm8_037652.htm)

<sup>67</sup> Fassler, J. (2021). *Foreign Ownership of U.S. Farmland is Growing. A Missouri Lawmaker Wants to Ban it in the State*. <https://thecounter.org/land-access-farmland-missouri-foreign-ownership/>

<sup>68</sup> United States Department of Agriculture Economic Research Service. Food Dollar Series. <https://www.ers.usda.gov/data-products/food-dollar-series/>

<sup>69</sup> United States Department of Agriculture Economic Research Service. Food Dollar Series. <https://www.ers.usda.gov/data-products/food-dollar-series/>

<sup>70</sup> Brones, A. (2018). *Karen Washington: It’s Not a Food Desert, It’s Food Apartheid*. <https://www.guernicamag.com/karen-washington-its-not-a-food-desert-its-food-apartheid/>

**The current consolidated, globalized system disempowers individuals and local communities.** Food should serve as a source of individual and collective well-being. As the Equitable Food-Oriented Development coalition found in their inaugural brown paper, “[communities of color] are intimately familiar with built environment or political challenges to health and wealth creation. These communities are often isolated from the strategies, resources, and institutions that promote economic opportunity.”<sup>71</sup> The food system represents a transformative opportunity to improve the quality of life of many for whom public governance has not traditionally served.

### **c. The Supply Chain Exploits Farmers, Low-Wage Workers, and the Environment**

**The current hyper-consolidated supply chain allows corporations to exploit farmers and the environment.** In the lifetime of the average American farmer, the United States has lost more than one-third of its farms.<sup>72</sup> Since 1950, the number of animals farmed in the United States has increased from approximately 100 million to 10 billion, a nearly 10,000% increase. The U.S. population during this time has grown by only 118%. In other words, far fewer farms grow far more animals, unnecessarily devastating local environments and deepening economic inequality.

In industrial animal agriculture, consolidation creates significant opportunities for abuse. Most animals are raised by “contract growers” who raise corporate-owned animals until they are large enough to be taken to the slaughterhouse. Corporate integrators exercise “comprehensive control” over contract growers via “contractual mandates and restrictions, management agreements, operating procedures, oversight, inspections, and market controls.”<sup>73</sup> Corporate integrator control is so comprehensive that it “[overcomes] practically all of the [contract growers’] ability to operate their businesses independent of [corporate] integrator mandates.”<sup>74</sup> For example, corporate integrators control the details of:

- Facility construction, including “detailed construction specifications,” “site grading, equipment, signage, and other attributes,”<sup>75</sup>
- Facility “lighting, heating, ventilation, and cooling,”<sup>76</sup>
- Animal and facility inspections, including “where and how to walk through the [facilities], the frequency and timing of inspections, and how to record the results,”<sup>77</sup>
- Animal feeding and watering,<sup>78</sup>

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<sup>71</sup> Equitable Food Oriented Development. (2019). *Brown Paper*. <https://www.efod.org/efod-brown-paper-2019.html>

<sup>72</sup> Statistic calculating using Census of Agriculture data from the United States Department of Agriculture National Agricultural Statistics Service. <https://www.nass.usda.gov/AgCensus/>

<sup>73</sup> U.S. Small Business Administration (2018). *Report 18-13: Evaluation of SBA’s 7(a) Loans to Poultry Farmers*. <https://www.sba.gov/document/report-18-13-evaluation-sbas-7a-loans-poultry-farmers>

<sup>74</sup> *Id.*; see also Franchise Tax Board of the State of California, In the Matter of Revenue and Taxation Code Section 25137 Petition of: SMITHFIELD PACKAGED MEATS CORPORATION AND ITS COMBINED AFFILIATES. <https://www.ftb.ca.gov/about-ftb/meetings/board-meetings/2021/march-2021/smithfield-opening-brief.pdf>

<sup>75</sup> *Id.*

<sup>76</sup> *Id.*

<sup>77</sup> *Id.*

<sup>78</sup> *Id.*



- Animal culling<sup>79</sup> and “depopulation.”<sup>80</sup>

Farmers suffer from today’s coercive, hyper-consolidated supply chain. Inflation-adjusted farm working capital decreased by 60% from 2012-2021, leaving farmers with one-third less cash on hand than in the immediate aftermath of the Great Recession.<sup>81</sup> For both beginning and multigenerational farm families for whom farming is a way of life and a connection to community, this financial stress undermines farmers’ mental health and well-being. 90 percent of U.S. farmers reported that financial problems for themselves or their farming colleagues had resulted in emotional stress and other mental health challenges.<sup>82</sup> According to TIME Magazine in 2019, “[s]uicides in farm communities are happening with alarming frequency . . . farmers have always talked of looming disaster, but the duration and severity of the current crisis suggests an alarming and once unthinkable possibility — that independent farming is no longer a viable livelihood.”<sup>83</sup>

Exploitations of farmers reflect and perpetuate systemic racism. Unequal government programs and banking practices have disproportionately burdened Black farmers. As a result, the U.S. food system has directly contributed to a significant loss of Black wealth. In 1910, 14% of U.S. farms were Black-owned.<sup>84</sup> Today, 1.7% of farms are Black-owned.<sup>85</sup> Black farmers earn, on average, 80% less net income than white farmers. These unequal programs were not limited to the Jim Crow South. New Deal recovery programs in the 1930’s, Federal Housing Authority programs in the 1950’s and 60’s, and USDA lending practices across the country undermined Black farmers. These inequities continue, with the average Black farmer receiving in government payments about half that of the average white farmer.<sup>86</sup>

**The current supply chain exploits farm workers and meatpacking workers.** During the COVID-19 pandemic, farm workers, the majority of whom are undocumented, were deemed

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<sup>79</sup> *Id.*

<sup>80</sup> Tyler Whitley. (2020). *Op-ed: Don’t Blame Farmers Who Have to Euthanize Their Animals. Blame the Companies They Work For.* Civil Eats.

<sup>81</sup> United States Department of Agriculture Economic Research Service. *Farm Income and Wealth Statistics: Farm Sector Financial Ratios.* <https://data.ers.usda.gov/reports.aspx?ID=17838>

<sup>82</sup> American Farm Bureau Federation. (2019). *New National Poll Shows Impacts of Rural Economy on Farmer Mental Health.* <https://www.fb.org/newsroom/new-national-poll-shows-impacts-of-rural-economy-on-farmer-mental-health>

<sup>83</sup> Semuels, A. (2019). “*They’re Trying to Wipe Us Off the Map*”: *Small American Farmers Are Nearing Extinction.* Time Magazine. <https://www.fb.org/newsroom/new-national-poll-shows-impacts-of-rural-economy-on-farmer-mental-health>

<sup>84</sup> *Thirteenth Census of the United States.* (1910). General Report and Analysis. <http://lib-usda-05.serverfarm.cornell.edu/usda/AgCensusImages/1910/05/01/1832/41033898v5sch01.pdf>

<sup>85</sup> United States Department of Agriculture. *2018 Census of Agriculture Race/Ethnicity/Gender Profile.* [https://www.nass.usda.gov/Publications/AgCensus/2017/Online\\_Resources/Race,\\_Ethnicity\\_and\\_Gender\\_Profiles/cpd99000.pdf](https://www.nass.usda.gov/Publications/AgCensus/2017/Online_Resources/Race,_Ethnicity_and_Gender_Profiles/cpd99000.pdf)

<sup>86</sup> United States Department of Agriculture. *2018 Census of Agriculture Race/Ethnicity/Gender Profile.* [https://www.nass.usda.gov/Publications/AgCensus/2017/Online\\_Resources/Race,\\_Ethnicity\\_and\\_Gender\\_Profiles/cpd99000.pdf](https://www.nass.usda.gov/Publications/AgCensus/2017/Online_Resources/Race,_Ethnicity_and_Gender_Profiles/cpd99000.pdf)



essential to national security.<sup>87</sup> Being identified as essential creates an insecurity common in today's industrial agricultural system.

The supply chain threatens farm worker health and offers little to no physical or financial security. In crop agriculture, 72 different pesticides have been banned in Europe but not in the United States.<sup>88</sup> This long-term threat to health is often worsened by cramped, dangerous and unsanitary work and living conditions. U.S. slaughterhouse workers, for example, suffer an average of two amputations per week.<sup>89</sup> A United Nations' Human Rights Watch report found sexual harassment to be nearly universal among female farm workers, who also suffer high rates of sexual assault.<sup>90</sup>

Farm workers endure these risks for very little benefit. The average farm worker family earns \$20,000-25,000 per year from farm work, a living wage in no state.<sup>91</sup> Only one-in-five employers offer farm workers insurance, compounding interconnected health and financial struggles.<sup>92</sup>

### **Exploitations of farm and slaughterhouse workers reflect and perpetuate systemic racism.**

While 95% of farmers in the United States are white, 80% of farm workers identify as Hispanic or Latino.<sup>93</sup> A growing form of farm worker exploitation exists through convict-leasing programs, which is a form of legal forced-labor connecting industrial food and agriculture and the U.S. carceral system. According to the HEAL Food Alliance, 30,000 incarcerated men and women serve in farm and other food-service positions as forced laborers.<sup>94</sup> In 2015 and 2016, the California Prison Industry Authority received more than \$2 million for its food and agriculture services. These programs, reflecting the broader inequities of the U.S. prison system, disproportionately burden BIPOC communities.<sup>95</sup>

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<sup>87</sup> Jordan, M. (2020). *Farmworkers, Mostly Undocumented, Become "Essential" During Pandemic*. The New York Times. <https://www.nytimes.com/2020/04/02/us/coronavirus-undocumented-immigrant-farmworkers-agriculture.html>

<sup>88</sup> Donley, N. (2019). "The USA lags behind other agricultural nations in banning harmful pesticides." *Environ Health* 18, 44. <https://doi.org/10.1186/s12940-019-0488-0>

<sup>89</sup> Wasley, A., Cook, C. D., & Jones, N. (2018). *Two Amputations a Week: The cost of Working in a US Meat Plant*. The Guardian. <https://www.theguardian.com/environment/2018/jul/05/amputations-serious-injuries-us-meat-industry-plant>

<sup>90</sup> United Nations Human Rights Watch. (2012). *Cultivating Fear: The Vulnerability of Immigrant Farmworkers in the US to Sexual Violence and Sexual Harassment*. <https://www.hrw.org/report/2012/05/15/cultivating-fear/vulnerability-immigrant-farmworkers-us-sexual-violence-and>

<sup>91</sup> Farmworker Justice. *Selected Statistics on Farmworkers (2015-16 Data)*. <http://www.farmworkerjustice.org/wp-content/uploads/2019/05/NAWS-Data-FactSheet-05-13-2019-final.pdf>

<sup>92</sup> *Id.*

<sup>93</sup> United States Department of Agriculture. *2018 Census of Agriculture Race/Ethnicity/Gender Profile*. [https://www.nass.usda.gov/Publications/AgCensus/2017/Online\\_Resources/Race,\\_Ethnicity\\_and\\_Gender\\_Profiles/cpd99000.pdf](https://www.nass.usda.gov/Publications/AgCensus/2017/Online_Resources/Race,_Ethnicity_and_Gender_Profiles/cpd99000.pdf)

<sup>94</sup> HEAL Food Alliance. (2017). *The Prison Industrial Complex and Agricultural Labor*. [https://drive.google.com/file/d/1ZWdBH5zIKbV6K6subbGMm4nUMY3\\_ZZgJ/view](https://drive.google.com/file/d/1ZWdBH5zIKbV6K6subbGMm4nUMY3_ZZgJ/view)

<sup>95</sup> *Id.*

#### d. The Supply Chain Creates Widespread, Underrecognized Nutritional Insecurity

Food is a human right, but the current food system has failed to secure this right even in the world's wealthiest nations. Agribusiness proponents argue that industrial agriculture is necessary in order to “feed the world.” In reality, today's food system fails to feed millions of American families. Meanwhile, much of the world, by population, is still fed by subsistence farmers or other small producers—to say nothing of the more than 2 billion people suffering from malnourishment globally.<sup>96</sup>

**Food insecurity is a major cause of U.S. healthcare spending.** The CDC found adults and children who suffer from food insecurity spend \$1,800 more every year on healthcare costs. In 2019, this would have resulted in \$24,660,000,000 in additional aggregate expenses.<sup>97</sup>

**U.S. children face critical nutritional security concerns.** Over the last year, 1-in-4 children have suffered from unreliable and insufficient access to nutritious food. Children who face food insecurity perform worse in school, are more likely to be hospitalized, and suffer worse physical and mental health outcomes than food-secure children of similar backgrounds. Moreover, nutrition lays an essential foundation to brain development. Infants and toddlers who consistently face food insecurity are two-thirds more likely to suffer developmental delays.<sup>98</sup> According to the CDC, one-third of children aged 2-5 do not receive a “whole fruit” serving on a given day.<sup>99</sup> Among teenagers, only 2% receive the recommended intake of fruits and vegetables.<sup>100</sup>

**Child food insecurity rates reflect systemic racism.** Prior to the pandemic, children of color already faced near-pandemic levels of food insecurity.<sup>101</sup> During the pandemic, children of color reported food insecurity at twice the rate of white children.<sup>102</sup>

**Current frameworks for understanding food security reflect systemic racism.** As Karen Washington and many BIPOC leaders have argued, the terms “food insecurity,” “grocery gap,” and “food desert” reinforce existing inequalities.<sup>103</sup> This terminology implies a lack of capacity, a state of victimhood, and emphasizes access over outcomes. Instead, government and non-

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<sup>96</sup> World Health Organization. (2020). *Malnutrition*. <https://www.who.int/news-room/fact-sheets/detail/malnutrition>

<sup>97</sup> Berkowitz, S. A., Basu, S., Meigs, J. B., & Seligman, H. K. (2018). “Food insecurity and health care expenditures in the United States, 2011-2013.” *Health services research*, 53(3), 1600–1620. <https://doi.org/10.1111/1475-6773.12730>

<sup>98</sup> Children's Healthwatch Research Brief. *Too Hungry to Learn: Food Insecurity and School Readiness, Part I of II*. [https://www.childrenshealthwatch.org/wp-content/uploads/toohungrytolearn\\_report.pdf](https://www.childrenshealthwatch.org/wp-content/uploads/toohungrytolearn_report.pdf)

<sup>99</sup> Centers for Disease Control and Prevention. (2020). *Fruit and Vegetable Consumption Among Children and Adolescents in the United States, 2015-2018*. <https://www.cdc.gov/nchs/products/databriefs/db391.htm>

<sup>100</sup> *Id.*

<sup>101</sup> Odoms-Young, A., & Bruce, M. A. (2018). “Examining the Impact of Structural Racism on Food Insecurity: Implications for Addressing Racial/Ethnic Disparities.” *Family & community health*, 41 Suppl 2 Suppl, *Food Insecurity and Obesity*, S3–S6. <https://doi.org/10.1097/FCH.0000000000000183>

<sup>102</sup> Gamblin, M. D., & King, K. *Racially Equitable Responses to Hunger During COVID-19 and Beyond: A Bread for the World Institute Special Report*. [https://bread.org/sites/default/files/downloads/racially-equitable-responses-to-hunger-during-covid-19-january-2021.pdf?\\_ga=2.50748205.525654942.1620930886-492111182.1620657426](https://bread.org/sites/default/files/downloads/racially-equitable-responses-to-hunger-during-covid-19-january-2021.pdf?_ga=2.50748205.525654942.1620930886-492111182.1620657426)

<sup>103</sup> Brones, A. (2018). *Karen Washington: It's Not a Food Desert, It's Food Apartheid*. <https://www.guernicamag.com/karen-washington-its-not-a-food-desert-its-food-apartheid/>

governmental organizations alike must seek to build solutions that address the root causes of the gap in who is nourished by the food system, recognizing that a just food system nourishes universally. It must build upon existing community assets to build power in communities, recognizing agricultural land and asset ownership as vehicles of wealth creation and food as essential to individual and community wellbeing and self-determination. More generally, USDA and other government agencies must prioritize wealth inequality over income inequality in recognition of the role wealth plays in individual and community self-determination.

**Most food-secure families lack true nutritional security.** The USDA relies on food security measures that assess geographic proximity to a grocery store and income. According to these figures, more than 10% of Americans suffer from food insecurity in a given year.<sup>104</sup> However, according to the CDC, 90% of Americans fail to eat the nutritionist-recommended fruits and vegetables.<sup>105</sup> Diet-related disease remains the top cause of death in the United States.<sup>106</sup>

## II. THE SOLUTION: ADDRESSING FOOD SUPPLY CHAIN CHALLENGES TO BUILD A JUST, SUSTAINABLE, AND SECURE FOOD SYSTEM

USDA calls for a transformational strategy that will “bolster local and regional food systems” while contributing to “economic prosperity,” as well as “national” and “nutritional” security. To do so, we recommend that USDA:

**Shorten the supply chain by investing directly in food that nourishes people.** The average meal travels 1,500 miles before it reaches its destination.<sup>107</sup> This accounting does not include the additional steps required to raise and transport animals in industrial settings, who consume approximately 50% of grain produced in the U.S.<sup>108</sup> Paying farmers to grow food outputs, such as fruits, vegetables, legumes, and fungi, rather than inputs, like monoculture corn or soy, will support more local and environmentally sustainable agricultural supply chains.

**Shift subsidies to just and sustainable forms of agriculture to support farmer economic opportunity, U.S. public health, food justice, and the global environment.** The vast majority of U.S. diets currently lack sufficient fruits and vegetable consumption, a direct result of a subsidy system that prioritizes processed food inputs, animal feed, and animal agriculture over fresh, sustainable, nourishing fruits, vegetables, legumes, fungi, and grains. Shifting direct and indirect subsidies—including USDA administered programs such as bailout payments and surplus purchases—to just crop agriculture supports a better living for family farmers, healthier

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<sup>104</sup> United States Department of Agriculture Economic Research Service. *Food Security and Nutrition Assistance*. <https://www.ers.usda.gov/data-products/ag-and-food-statistics-charting-the-essentials/food-security-and-nutrition-assistance/#:~:text=The%20prevalence%20of%20food%20insecurity,had%20very%20low%20food%20security>.

<sup>105</sup> Centers for Disease Control and Prevention Division of Nutrition, Physical Activity, and Obesity. *Only 1 in 10 Adults Get Enough Fruits or Vegetables*. <https://www.cdc.gov/nccdphp/dnpao/division-information/media-tools/adults-fruits-vegetables.html>

<sup>106</sup> Mokdad, A. H., Katz, B., Thayer, L., Ballestros, K., Echko, M., Glenn, S., Olsen, H. E., Mullany, E., Lee, A., Khan, A. R., Ahmadi, A., Ferrari, A. J., Kasaeian, A., Werdecker, A., Carter, A., Zipkin, B., Sartorius, B., Serdar, B., Sykes, B. L., Troeger, C., Fitzmaurice, C., . . . Murray, C. J. L. (2018). “The State of US Health, 1990–2016.” *JAMA*, 319(14), 1444. <https://doi.org/10.1001/jama.2018.0158>

<sup>107</sup> Michigan State University MSU Extension. (2012). *How Far Did Your Food Travel to Get to You?* [https://www.canr.msu.edu/news/how\\_far\\_did\\_your\\_food\\_travel\\_to\\_get\\_to\\_you](https://www.canr.msu.edu/news/how_far_did_your_food_travel_to_get_to_you)

<sup>108</sup> Food and Agriculture Organization of the United Nations. (2006). *Livestock’s Long Shadow*.

and longer lives for tens of millions of Americans, and more sustainable, compassionate relationships among people, animals, and the planet.

**Expand and shift research, extension, and technical assistance to support just and sustainable forms of crop agriculture.** All farmers require access to technical, physical, and financial resources. BIPOC farmers often face stronger barriers to technical support, access to financial institutions and land, access to government lending, grant, and contract programs, and market access. USDA should prioritize support to benefit systemically excluded farmers. In a country where the food system has been built upon centuries of genocide, land-theft, and the enslavement of millions of Americans’ ancestors, prioritizing systemically excluded populations advances equity.

Moreover, research and technical assistance should support agriculture that nourishes people and the planet. One specific approach could include changing the competitive grant formula for land-grant and extension activities to reflect: 1) Broadly shared economic prosperity; 2) Vibrant regional food systems; 3) Increased fruit, vegetable, legume, fungi, and grain consumption; 4) A holistic approach to environmental sustainability that mitigates GHG emissions, air and water pollution, and resource consumption. Technical assistance, research, and other forms of loans, grants, and government contracts should be made accessible through applications similar to those found in USDA-SARE programs, which feature short, narrative style applications and an oral interview. This process better allows both farmers and administrators to meet each other where they are.

**Invest in “public food infrastructure,” such as schools, hospitals, food hubs, community kitchens, and composting facilities to improve communities’ capacities to support sustainable local and regional food systems and to ensure all people have access to nourishing food.** Right now, many communities across the country lack sufficient food production, processing, and distribution infrastructure. School food infrastructure can better support regional, nourishing food systems. For example, the Oakland Unified School District in California, after building a “central kitchen” facility to serve students, replaced many processed meat, poultry, and cheese based meals with just and sustainable forms of plant foods. As a result, the district saved 42 million gallons of water every year. In Utah, Granite City School District opened its facility to food entrepreneurs as an “after hours” business incubator.<sup>109110</sup> USDA should prioritize: 1) Eliminating the child co-pay on school meals; 2) Allowing school food authorities a larger operating margin; 3) Encouraging regional fruit, vegetable, legume, and fungi agriculture; 4) Creating better healthy food access for low-income students in districts of all socioeconomic groups; 5) Creating municipal loan and grant programs to invest in school food infrastructure that can act as a hub for local and regional food systems. Other vehicles for healthy food public infrastructure funding may include Medicare and Medicaid through value-for-payment programs or other forms of medically-tailored food.

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<sup>109</sup> Granite School District. *Bates Central Kitchen Tours*. <https://www.graniteschools.org/nutritionservices/bates-central-kitchen-tours/>

<sup>110</sup> Forthcoming publication. Cohen, Aaron (2021). *Durham Public Schools Central Kitchen Design and Feasibility Analysis*. Food Insight Group.

**Immediately halt implementation of the New Swine Slaughter Inspection System and vacate that rule, revoke all line-speed waivers issued to any poultry or cattle slaughterhouses, cease issuing new waivers, and act to instead reduce line speed maximums. Doing so improves animal welfare, the economic and physical health of farmers and slaughterhouse workers, and advances environmental priorities.** Recent increases and proposed increases in line speeds for the poultry, swine, and cattle sectors would significantly worsen the human and environmental impact of livestock slaughter and production. For farm workers, it makes their work—already the most dangerous in the country by annual work-related fatality rates—even more dangerous, with employees of slaughterhouses reporting significant injuries. Slaughterhouse workers in the United States suffer two amputations per week, lacerations, and other lifelong injuries.<sup>111</sup> According to a member of one of the few unionized efforts, “The pace we are working at is at full capacity for what one person can do... Each job in this factory is time studied. It's a method that they use to take a look at an individual to see how many cuts it takes them to do a specific job. At the end of the day, the customer as well as the employee is going to pay the price for this change.”<sup>112</sup>

**Regulate depopulation and disposal to reduce methane emissions and air and water pollution.** Mass depopulation has resulted in egregious animal suffering, while producing significant, unrestricted, currently unknown quantities of GHG emissions and polluting the air, soil, and groundwater. APHIS should create and publish online an electronically searchable and sortable database with information about any assistance pertaining to mass carcass management provided by APHIS in connection with any mass animal health emergency. The rule shall mandate that the information be published as quickly as possible or within one business day of receipt, whichever is earlier. The information provided in such database for each grant of assistance shall include, but is not limited to: 1) The owner of the animals; 2) The number and species of animals depopulated; 3) The date(s) of depopulation and disposal (and, if disposal occurred on multiple days, the number of animals disposed on each day); 4) The depopulation method utilized; 5) The disposal method utilized; 6) The disposal location, including the location of any incineration ash residues and/or final composted materials; 7) A summary of the federal support provided, including any indemnification payments, subsidies, assets of the National Veterinary Stockpile, and/or other emergency assistance provided; 8) Any monitoring, testing, or sampling protocol put in place to monitor releases of environmental contaminants from the disposal location.

**Re-evaluate pesticide and fertilizer management practices to prioritize human health and environmental sustainability.** Shifting financial assistance from pesticide-reliant monocultures to diversified organic crop agriculture creates opportunities for farmers to better adapt to challenges such as drought and an unpredictable growing season.<sup>113</sup> This would help USDA meet its climate goals, increase food security in the face of climate disasters, and build a more resilient

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<sup>111</sup> Wasley, A., Cook, C. D., & Jones, N. (2018). *Two Amputations a Week: The cost of Working in a US Meat Plant*. The Guardian. <https://www.theguardian.com/environment/2018/jul/05/amputations-serious-injuries-us-meat-industry-plant>

<sup>112</sup> Painter, K. L. (2019). *Union representing Worthington Meat Plant Workers Suing to Stop New USDA Rule*. StarTribune. <https://www.startribune.com/union-representing-worthington-meat-plant-workers-suing-to-stop-new-usda-rule/562459852/>

<sup>113</sup> Farmworker Justice. (2013). *Exposed and Ignored: How Pesticides are Endangering Our Nation's Farmworkers*. <https://kresge.org/sites/default/files/Exposed-and-ignored-Farmworker-Justice-KF.pdf>



food system to withstand disruptions such as those witnessed during the COVID-19 pandemic when the vulnerabilities of long supply chains were exposed, resulting in food shortages, on-farm food waste, and mass depopulation of farmed animals.

Better pesticide management will also protect farm workers and farming communities from significant threats to their health and well-being. Each year, the 5.1 billion pounds of pesticides used results in thousands of farm workers suffering from the effects of pesticide poisoning, “including headaches, nausea, shortness of breath, or seizures. Pesticide exposure leads to chronic health problems, such as cancer, infertility (and other reproductive problems), neurological disorders, and respiratory conditions.”<sup>114</sup>

**Stop subsidizing the construction of factory farms and the consolidation of the meat industry.** As the Small Business Administration has already recognized,<sup>115</sup> USDA’s Farm Service Agency (FSA) must stop granting loans and loan guarantees to construct and expand industrial animal agricultural operations. FSA reviews applications for federal loan assistance and decides whether to provide direct and guaranteed loans for a variety of agricultural activities, including for refinancing debt obligations, funding meat and dairy purchases, and creating and expanding industrial animal agricultural operations. For example, records provided by FSA in response to a Freedom of Information Act (FOIA) request show that between August 2016 and August 2018, FSA provided at least 130 direct loans over \$100,000 or guaranteed loans over \$300,000 to animal agriculture facilities in the state of Indiana alone.<sup>116</sup> These loans were for activities such as building new or expanding existing dairy, chicken, turkey, pig, veal calf, or puppy barns; building new manure management structures; and purchasing livestock. Rather than continuing to use tax dollars to fund the expansion of these operations, USDA should instead reserve its loans and loan guarantees for expanding sustainable agricultural enterprises.

**Establish a new division within USDA to address competition in the agriculture sector, or empower GIPSA to take on these responsibilities.** No food company should be too big to fail. We need to decentralize the food system and relocalize it with strong regional infrastructure and a level playing field for independent family-scale producers and regional businesses. One step towards doing so is to address current issues related to distorted, unfair markets resulting from corporate consolidation. The new competition division should assess the state of competition in all sectors of agriculture where it has some statutory mandate, including the Packers & Stockyards Act, Agricultural Marketing Act, Perishable Agricultural Commodities Act, Federal Meat Inspection Act, Poultry Products Inspection Act, and the Egg Products Inspection Act, and should include measurements of concentration of market share in specific sectors and regions, as well as impacts on competition and price discovery from vertical integration, contracting practices, and intellectual property practices. This division should not only assess the state of competition in the agriculture system but should also recommend cases for referral to relevant antitrust authorities (the U.S. Department of Justice or the Federal Trade Commission) for enforcement actions and work with those authorities to address concentration in the meat industry.

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<sup>114</sup> *Id.*

<sup>115</sup> SBA Office of the Inspector General. (2018). Evaluation of SBA 7(a) Loans Made to Poultry Farmers. <https://www.sba.gov/document/report-18-13-evaluation-sbas-7a-loans-poultry-farmers>.

<sup>116</sup> Compl., *Dakota Rural Action v. USDA*, Case No. 18-02852 (D.D.C.), <https://www.publicjustice.net/wpcontent/>



**Change food access language to better reflect the realities of systemic racism.** The language of “food insecurity” and “food deserts” reflects and perpetuates systemic racism. It acts as a barrier in the supply chain, further undermining systemically oppressed populations’ right to food sovereignty and self-determination. The language should be replaced with language that better reflects these significant differences in power, which disproportionately burden BIPOC communities. This language should be developed and reviewed through participatory, community-based processes.

**Dietary guidelines, government partnership and procurement programs, and agricultural subsidies should reflect best-available health and environmental science literature.** USDA should use EPA as a model for integrating best available science to evaluate regulatory impact on human and environmental health. In EPA’s words “[t]he process of incorporating high-quality science into Agency decision-making is coordinated by science organizations within the Agency. It is guided by EPA’s scientific integrity policies. In addition, the Agency’s stringent scientific peer review processes are designed to ensure that all EPA decisions are founded on credible science and data.”<sup>117</sup> This process is iterative, updating based on best-available science regarding air particulate pollution and source pollution with clearly defined goals. USDA should ground its decision making processes in science, developing dietary guidelines, purchasing programs, and subsidy programs that reflect best available scientific evidence, independent of industry influence, with the stated goals of advancing U.S. health and environmental well-being.

**Invest in a just and sustainable food system, not simply a less unjust or less unsustainable food system.** Current approaches to environmental management, like biodigesters on factory farms, attempt to paint unjust, unsustainable forms of agriculture as better for the people and the environment. Yet energy and food transition experts agree: these approaches further entrench these deeply harmful animal production practices and are distractions from the holistic approach the agency is envisioning through this call for comments. The USDA has committed to building a prosperous, secure, and resilient food system for all. This will only be possible if the USDA stops promoting animal manure biogas projects, invests in fruits, vegetables, legumes, fungi and other forms of just crop agriculture, and implements a full movement away from promoting meat consumption and industrial animal agriculture. A report published in *The Lancet* in 2019 found that a dietary shift toward just forms of crop production and away from animal products would reduce annual mortality by 10% and annual GHG emissions by 70% globally.<sup>118</sup>

The choice is clear: invest in the fruits, vegetables, legumes, fungi, and grains that will build universal nutritional security, regenerate our soils, and better steward our planet. Invest in public food infrastructure to support stronger forms of civic production and distribution. Invest in the farmers, farm workers, and other workers across the supply chain who embody the word “essential” but whom we treat as expendable. Finally, invest in measures that reduce pollution

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<sup>117</sup> United States Environmental Protection Agency. *The Role of Science at EPA*. <https://www.epa.gov/research/role-science-epa#:~:text=Science%20provides%20the%20foundation%20for.review%2C%20transparency%2C%20and%20ethic>

<sup>118</sup> Willet, W. et al. (2019). *Food in the Anthropocene: the EAT-Lancet Commission on healthy diets from sustainable food systems*. The Lancet Commissions.

and emissions at the source rather than continuing to support inefficient, unhealthy, and environmentally disastrous forms of industrial agriculture.

### **III. CONCLUSION**

Commenters strongly agree with the USDA’s focus towards “tackling this supply chain holistically – looking across a full range of risks and opportunities...[to] position USDA to make long-term, transformative changes for economic, national, and nutritional security,” and are recommending workable, holistic solutions that are essential for establishing a more just, sustainable, secure, and resilient food system.

Thank you for your consideration.

Sincerely,

350 Chicago  
350 Seattle  
ACLE  
Animal Equality  
Animal Legal Defense Fund  
Animal Outlook  
Animal Welfare Institute  
Animals Are Sentient Begins, Inc.  
American Society for the Prevention of Cruelty to Animals (ASPCA)  
Balanced  
Barn Sanctuary  
Beyond Carnism  
Broome Tioga Green Party  
Center for Biological Diversity  
Charleston Power Family Garden, MO  
Compassion in World Farming International  
Cornucopia Community Advocates  
Cousins Compost LLC, IN  
Crawford Stewardship Project, WI  
CreatureKind  
Earth Action, Inc.  
EcoSuburbia, LLC  
Encompass  
Endangered Habitats League  
Ethos Farm Project  
Factory Farming Awareness Coalition  
Fair Farms, MD  
Family Farm Action Alliance  
Farm Forward  
Farm Sanctuary  
Florida Food Policy Council

Food | Climate | Strategies

Food Chain Workers Alliance\*, which includes:

- Asociación Vendedores Ambulantes
- Brandworkers
- Burgerville Workers Union
- California Institute for Rural Studies
- Cincinatti Interfaith Workers Center
- Community to Community Development
- Fair World Project
- Familias Unidas Por La Justicia
- Farmworker Association of Florida
- Federation Du Commerce
- International Labor Rights Forum
- Justicia for Migrant Workers
- Laundry Workers Center United
- Migrant Justice
- Our Walmart
- Pioneer Valley Workers Center
- Restaurant Opportunities Centers United
- Retail, Wholesale, and Department Store Union
- Rural and Migrant Ministry
- Rural Community Workers Alliance
- Street Vendor Project
- Teamsters Joint Council 7
- The Alianza Agrícola
- The Farmworker Support Committee
- The Mississippi Workers' Center for Human Rights
- UFCW 770
- UNITE HERE
- Venceremos
- Warehouse Workers for Justice
- Warehouse Workers United
- Worker Justice Center of New York
- Workers Center of Central NY

Friends of Family Farmers

Foodshed Capital

Four Paws, USA

Gardens for Humanity

Global Federation of Animal Sanctuaries

Graceful Acres

Habitat Works

Harvard Animal Law & Policy Clinic

Haw River Assembly, NC

Humane Society of the United States

Izaak Walton League of America - Allegheny County, PA  
Kaolin Beauty  
Lady Freethinker  
Lead for Farmed Animals  
Legacy Circle Farms  
Living Ubuntu  
Local Matters, OH  
Maui Bees Inc  
Men and Women United for Youth & Families, CDC  
Missouri Coalition for the Environment  
NC WARN  
NutritionFacts.org  
Orange County for Climate Action, CA  
Partners for Education, Agriculture, and Sustainability  
Physicians Association for Nutrition - USA  
Physicians Committee for Responsible Medicine  
Plataforma ALTO  
PrairieErth Farm  
Progressive Democrats of America Orange County, CA  
Récolte Energy  
Regenerative Organic Alliance  
Resilient Biosystems LLC, SC  
Resources Renewal Institute  
Rustic Canyon Family  
Scarabee Regenerative  
Showing Up for Racial Justice (SURJ) St. Johns, Portland, OR  
Slow Food DFW  
Slow Food USA  
Strategies for Ethical and Environmental Development (SEED)  
SURJ (Showing Up for Racial Justice) Altadena, CA  
SURJ (Showing Up for Racial Justice) Contra Costa County, CA  
SURJ Marin - Showing Up for Racial Justice  
SURJ Silverton  
Sustainable Food Center  
Sweet Farm Foundation  
The Good Home Company  
The Plantrician Project  
Toronto Vegetarian Association  
TransfarmAg  
Unexpected Farm  
USF Urban Food Sovereignty Group  
Wellness in the Schools  
West End Revitalization Association (WERA)  
White People for Black Lives Phoenix, AZ  
World Animal Protection US

*\* The Food Chain Workers Alliance, a network of worker organizations that have organized in solidarity and to uplift each organization's individual voice, co-signed as a single entity. The above list has been organized to uplift each organization and highlight their community-based work to advance a just and sustainable food system.*