

June 21, 2021

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

**Re: Comments in response to “Supply Chains for the Production of Agricultural Commodities and Food Products” - AMS-TM-21-0034 – Values-driven food procurement as a strategy for achieving resilient, diverse, and secure supply chains**

On behalf of our millions of members and supporters, the 67 undersigned organizations, companies, and school districts are pleased to submit comments in response to USDA’s request for comments titled: “Supply Chains for the Production of Agricultural Commodities and Food Products” (AMS-TM-21-0034). The scope of these comments is limited to the role that values-driven federal food procurement can and should play in achieving the resilient, diverse, and secure agricultural supply chains that President Biden’s EO.14017 envisions.

The federal government funds tens of billions of dollars of food procurement each year for children in schools, military service members, veterans in VA hospitals, people incarcerated in federal prison, and seniors who rely on federal feeding programs. However, the vast majority of spending on public food procurement contradicts the administration’s stated interests of addressing climate change, advancing racial equity, protecting public health, achieving nutrition security, and strengthening local economies, among other key issues. This is due in large part to the state of US food systems and supply chains, which compromise public health and well-being with disproportionate impacts for Black, Indigenous, and other people of color (BIPOC) through the exploitation of the food and farm workers, concentration of corporate wealth, degradation of national resources, and production of highly processed foods with low nutritional value. The COVID-19 pandemic has greatly exacerbated many of the existing challenges in the food supply chain.

While most federal food service and feeding programs do follow at least some nutrition guidelines and some agencies try to purchase locally produced food, the federal government lacks a robust values-aligned food procurement policy and practices.

In the same way that federal energy procurement has accelerated the transition to clean energy across the U.S. economy, food procurement can be a driver for the just, healthy, and sustainable food system we desperately need. We urge the administration to bring federal food purchasing practices into alignment with its policy objectives to achieve racial justice, fight climate change, support family farms, strengthen local economies, ensure nutrition security, support food and farmworkers, and protect animal welfare. We refer to this concept as values-driven food procurement.

We believe these seven core values, applied to the Biden administration’s efforts to strengthen US food supply chains, will be critical to achieving a just, equitable food system that promotes the health of consumers and benefits producers, workers, educators, and their communities. Each of these values must be operationalized in all federal food procurement and food service activities.<sup>1</sup>

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<sup>1</sup> Values are adapted from those put forth by the Center for Good Food Purchasing, HEAL Food Alliance, Food Chain Workers Alliance, and the National Farm to School Network.

- **Local economies:** The federal government can create more diversified and resilient supply chains by supporting local and regional food systems. Strengthening supports for locally-owned, small and mid-sized agricultural and local food processing operations will both create more robust regional economies and promote stability and security in the food supply.
- **Environmental justice:** Prioritizing environmental sustainability in food supply chains can shift U.S. food systems away from practices that contribute to climate change and pollute communities of color, and towards a more equitable, sustainable use of our soil and water. This includes prioritizing foods produced sustainably, as well as ensuring protections from existing food and farm-related pollution for frontline farm and food workers and adjacent communities.
- **Nutrition and health:** The federal government can leverage food purchases to promote the production of healthier food products throughout the supply chain, such as fruits, vegetables, whole grains, legumes, nuts and seeds, in minimally processed forms. The *Dietary Guidelines for Americans* should be consistently operationalized in all federal facility food service venues—for example, by implementing the *Food Service Guidelines for Federal Facilities*—and federal feeding programs.
- **Racial equity:** Progress towards a just food system requires us to address the historic and ongoing structural racism embedded in the US food system and to actively promote food sovereignty and racial equity in food procurement. The Biden administration can advance racial equity in food supply chains by prioritizing institutional food contracts for independent BIPOC producers, as well as BIPOC owned and operated food businesses, including processors and distributors.
- **Worker justice:** The workers who harvest, process, transport, prepare and serve food deserve—but many don't currently have—the same benefits and legal protections as workers in other industries in our country. Throughout the supply chain, the federal government must protect the right of workers to organize, ensure healthy and safe working conditions, and pay living wages to frontline food workers.
- **Animal welfare:** Humane treatment of animals in food production is a key part of a respectful, relational – not extractive – food system. Inhumane conditions in meat and poultry production are intertwined with the corporate consolidation of our food system, and the prioritization of cheaply produced meat at the expense of animal welfare, worker safety, farmer livelihoods, and community health. Additionally, prioritizing suppliers who practice judicious use of antibiotics in livestock production would safeguard human health as well as animal health.
- **Transparency in supply chain data:** Achieving this would require suppliers and institutions to make information publicly available on food sourcing throughout the supply chain, which the administration can help to facilitate. The lack of transparency in public supply chains represents a major barrier to achieving progress and measuring success on stated goals.

There are many factors that could – and in some cases, already do – disrupt or compromise our food and agricultural supply chains, including climate change, environmental and ecosystem degradation, corporate consolidation, and risks to the health and well-being of food system workers. Its own food procurement is one of the federal government's most direct points of leverage to spur the resilient, just and healthy food system that we need to weather these threats. We hope that USDA will lead the way in implementing bold and innovative values-driven food procurement policies and that this administration will ensure the federal government “walks the walk” by aligning food purchases with its laudable goals to fight climate change, ensure nutrition security, and achieve racial justice.

We recommend that the Biden administration proceed with operationalizing these principles in collaboration with the non-governmental organizations and academic institutions that have already been pursuing resilient agricultural supply chains via values-driven public food procurement. The undersigned organizations offer our support and assistance in implementing this vision. Responses may be directed to

Chloë Waterman at Friends of the Earth ([cwaterman@foe.org](mailto:cwaterman@foe.org)) and/or Jessi Silverman at the Center for Science in the Public Interest ([jsilverman@cspinet.org](mailto:jsilverman@cspinet.org)).

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| Agriculture Fairness Alliance                                     | Laurie M. Tisch Center for Food, Education & Policy        |
| American Society for the Prevention of Cruelty to Animals (ASPCA) | Marquette Food Co-op                                       |
| Animal Legal Defense Fund   | Mercy For Animals  |
| Association of State Public Health Nutritionists                  | Mesa County Valley School District 51                      |
| Balanced  | National Farm to School Network                            |
| Boulder County Farmers Markets                                    | National Latino Farmers & Ranchers Trade Association       |
| Buffalo River Watershed Alliance                                  | National Sustainable Agriculture Coalition                 |
| Center for Good Food Purchasing                                   | NH Farm to School  |
| Center for Science in the Public Interest                         | Nourish Colorado   |
| ChangeLab Solutions   | Open Food Network USA                                      |
| Chicago Food Policy Action Council                                | Open Markets Institute                                     |
| Chicago Public Schools  | Oregon Food Bank   |
| DC Greens   | Perpetual Harvest, LLC                                     |
| Eat for the Earth   | Physicians Against Red Meat (PhARM)                        |
| Farm Aid  | Pittsburgh Food Policy Council                             |
| Farm Forward  | Plataforma ALTO  |
| Farm Sanctuary  | Public Justice   |
| Farmworker Association of Florida                                 | Real Food Media  |
| Food & Water Watch  | Sierra Club, Miami Group                                   |
| Food Chain Workers Alliance                                       | Sitka Local Foods Network                                  |
| FoodCorps   | Slow Food USA  |
| FOUR PAWS USA   | Socially Responsible Agriculture Project                   |
| Friends of the Earth U.S.   | Society of Behavioral Medicine                             |
| Greater Cincinnati Regional Food Policy Council                   | Strategies for Ethical and Environmental Development, Inc. |
| Green State Solutions   | Stray Dog Institute  |
| Groundwork Center for Resilient Communities                       | Sun Produce Cooperative                                    |
| Harvard Law School Food Law & Policy Clinic                       | The Common Market  |
| HEAL (Health, Environment, Agriculture, Labor) Food Alliance      | The Land Connection  |
| Health Care Without Harm  | The Planetary Health Collective                            |
| Healthy Food Strategies   | Union of Concerned Scientists                              |
| Jefferson County Food Policy Council                              | Veritable Vegetable  |
| Johns Hopkins Center for a Livable Future                         | Western Organization of Resource Councils                  |
| Kitchen Sync Strategies   | World Animal Protection US                                 |