

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.¹

¹ 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) and/or Jessi Silverman at the Center for Science in the Public Interest (jsilverman@cspinet.org).

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