

HOW CAN WE BUILD A HEALTHIER, MORE EQUITABLE AND RESILIENT FOOD SYSTEM?

As an interdisciplinary academic center based within the Johns Hopkins Bloomberg School of Public Health, The Center for a Livable Future (CLF) applies a public health lens to questions of food system reform. In this document, we focus on industrial food animal production, both terrestrial and aquatic, recognizing that positive change in these areas will have positive impacts on human health, ecological health, and environmental justice. (Read more about CLF at the end of this document.)

LEGISLATION AND PROGRAMS TO TARGET FOR POSITIVE CHANGE

Our recommendations involve enforcing existing legislation, suggesting new legislation and offering ideas to modify existing programs.

- Clean Water Act
- Clean Air Act
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
- Emergency Planning and Community Right-to-Know Act (EPCRA)
- Occupational Safety and Health Act National Environmental Policy Act (OSHA)
- National Labor Relations Act (NLRA)
- Fair Labor Standards Act (FLSA)
- Animal Drug User Fee Act (ADUFA)
- Advancing the Quality and Understanding of American Aquaculture Act (AQUAA)
- Environmental Quality Incentive Program (EQIP)
- Farm Service Agency (FSA) loans
- Conservation Stewardship Program (CSP)

FOOD ANIMAL PRODUCTION, REGENERATIVE AGRICULTURE, AND FOOD CHAIN WORKERS

VISION

We support a food production system that protects ecosystems, workers, animals, and communities, with an emphasis on justice and inclusion for people and communities of color, and for communities experiencing financial hardship. We recognize that various forms of regenerative agriculture (including permaculture, agroecology, agroforestry, etc.) can and should play a significant role in transforming food production to realize this vision.

Goal: Protect human health by reducing antibiotic-resistant illnesses and preserving the valuable resource of antibiotics.

Recommendation

The federal government should bring the use of medically important antibiotics in US poultry and livestock production into compliance with the 2017 World Health Organization (WHO) recommendation that producers stop using antibiotics in healthy animals.

Goal: Decrease food production-related environmental degradation and harm to human health.

Recommendations

- The federal government should remove CAFO exemptions from the reporting of environmental emissions of hazardous materials under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Emergency Planning and Community Right-to-Know Act (EPCRA) reporting requirements.
- Communities near CAFOs should be notified when hazardous substances are released in excess of acceptable levels.
- Food animal production facilities classified as CAFOs should be subject to National Pollutant Discharge Elimination System (NPDES) permitting under the Clean Water Act, because they are usually "point sources" of pollution.
- The federal government should strengthen CAFO regulation under the Clean Air Act by developing mechanisms to better monitor air emissions, and by collecting air emissions data to improve understanding of community exposure risks.
- The federal (and state) government should prohibit the installation of new liquid manure handling systems, including waste lagoons, and phase out their use on existing operations in order to reduce the risk of public health and environmental disasters.

- The federal (and state) government should apply the National Pollutant Discharge Elimination System (NPDES) permitting program and Natural Resources Conservation Services Comprehensive Nutrient Management Plans (CNMPs) to develop and implement strict oversight protocols for the application of dry manure so that it does not exceed agro-economic standards.
- Federal zoning guidelines should be developed to preserve the ability of states and localities to tailor specific guidelines. Federal guidelines should include a health impact assessment added to the National Environmental Policy Act along with the existing environmental impact assessment. The required impact study should include an assessment of the cumulative effects of food animal production facilities located in all proximal communities, including vulnerable low income, minority, and economically distressed communities.
- Increase funding for research on and dissemination of food animal production practices that will be beneficial to the environment, public health, and rural communities, and offer funding and technical assistance to farmers to adopt these practices.
- Eliminate waste-management subsidies that CAFOs receive under the Environmental Quality Incentive Program (EQIP).
- Award Environmental Quality Incentives Program (EQIP) funding and Farm Service Agency (FSA) loans to small and medium-sized operations—not CAFOs—and require a rigorous environmental and public health assessment as part of the approval process.
- Reform the federal crop insurance program to reward stewardship practices, and make real, measurable conservation a condition of eligibility for premium subsidies.

Goal: Protect and support food chain workers, farmers, rural communities and producers, with a focus on equity, justice, and inclusion.

Recommendations

- Extend Occupational Safety and Health Act protections to workers in CAFOs, including inspection and enforcement of labor laws regardless of the number of employees in operation.
- Improve outreach and service delivery to farmers and ranchers of color and other historically underserved producers by including technical assistance with conservation planning and program application, and notifying eligible producers of the EQIP advance payment at enrollment and the set asides in Conservation Stewardship Program (CSP) and EQIP for socially disadvantaged and beginning farmers and ranchers.
- Provide targeted technical assistance to help producers and communities of color, and other historically underserved populations, mitigate and adapt to the impacts of weather extremes and climate disruption through participation in conservation programs like CSP and EQIP.

- Issue a minimum CSP payment for all successful applicants (including contract renewals) of \$4,000 per year for the FY 2021 and all future sign-up periods to incentivize the participation of smaller-acreage, specialty crop producers.
- Regulate and lower line processing speeds to help reduce worker injuries and contamination.
- Extend all NLRA and FLSA protections to farmworkers and other exempt workers.
- Include worker and community reports of violations in environmental and labor standards enforcement.
- The federal government should review and address environmental justice and equity issues in permitting decisions for projects with the potential to disparately impact communities in violation of Title VI of the Civil Rights Act of 1964.
- Allow a pathway to citizenship for all immigrant farmworkers.

Goal: Provide full protection for workers specific to the Covid-19 pandemic.

Recommendations

- Use mitigation strategies based on the hierarchy of controls such as: maintaining a six-foot distance between workers, installing physical barriers, staggering worker shifts, and providing appropriate personal protective equipment (PPE).
- Prioritize food and agriculture workers for regular Covid-19 testing and vaccination.
- Engage all cases in contact tracing by state and local health departments.
- Provide workers affected by Covid-19 with access to health care, isolation, quarantine pay, and other support to stop outbreaks.
- Include hazard pay for essential workers, including food workers, and provide it until the pandemic no longer poses a risk for workers.
- Issue OSHA Emergency Temporary Standard providing regulations to protect workers from Covid-19 exposure at workplaces.
- Issue enforceable housing and transportation guidelines that minimize exposure and risk of contracting Covid-19.
- Provide free, prompt, and reliable Covid-19 medical care including free vaccinations to all, regardless of legal status.
- Ensure access to workers' compensation protections for all workers.
- Ensure workplace retaliation complaints are thoroughly investigated without compromising the safety of workers issuing them.

Note: In 2020, during the Covid-19 pandemic, we witnessed thousands of slaughterhouse workers testing positive for the virus and hundreds of lives were lost; the Center <u>developed basic criteria</u> for protecting these vulnerable workers.

FISHERIES, AQUACULTURE, AND SEAFOOD

VISION

We support a seafood production system that protects long-term ocean and ecosystem health, worker health and safety, consumer health and safety, and communities and populations engaged in the seafood industry.

Goal: Ensure safe, sensible use of antibiotics in seafood production.

Recommendations

- Include testing of farmed seafood products for sale in the United States in the National Antimicrobial Monitoring System for Enteric Bacteria.
- Create a specific category for aquaculture in the Animal Drug User Fee Act data collection and reports.

Goal: Ensure a healthy, nutritious seafood supply.

Recommendation

 Invest resources in tracking nutritional content of key farmed species to develop a knowledge base of nutritional changes as aquaculture feed compositions shift in response to limited fishmeal and fish oil supplies.

Goal: Protect and support the safety and livelihoods of workers and producers in the seafood industry.

Recommendations

- Revise regulations to provide clear jurisdiction and standards to protect occupational health and safety for aquaculture workers.
- Build on the work of the Obama Administration to increase global seafood traceability, leveraging the role of the US as a major seafood importer to reduce illegal, unreported, and unregulated fishing in non-US waters.
- Strengthen the Advancing the Quality and Understanding of American Aquaculture Act or AQUAA Act's proposed regulatory structure for the offshore aquaculture industry in the US to address concerns regarding occupational safety and health, fish escapes, disease pressures and treatments, and fish waste.
- Incorporate increased access to locally and regionally produced farmed and wild seafood into food procurement and fisheries policies.

ABOUT CLF

THE CENTER FOR A LIVABLE FUTURE

Since 1996 the Johns Hopkins Center for a Livable Future has been addressing—and proposing solutions—to some of the most pressing issues in the food system. Based within the Bloomberg School of Public Health, the interdisciplinary academic center is a leader in public health research, education, policy and advocacy, dedicated to building a healthier, more equitable and resilient food system. Since its founding, a primary focus of the Center has been understanding and addressing the public health and environmental problems caused by large food animal production operations, often referred to as industrial animal agriculture facilities or CAFOs (concentrated animal feeding operations).

OUR FOCUS

As part of our focus on industrial food animal production (IFAP), the Center develops and supports policy positions to protect farmworkers and communities; freeze the expansion of existing CAFOs and stop new CAFO facilities; and to promote a transition to sustainable regenerative agriculture. From 2005 to 2008, the Center was the home of the Pew Commission on Industrial Farm Animal Production, which <u>developed 24 recommendations</u> to address the public health, environment, animal welfare and community problems caused by large scale IFAP. The Commission concluded that industrial food animal production is an unacceptable threat to public health and the environment, is harmful to the animals housed in the system, and depresses economic activity, especially in rural communities and communities of color.

This year, the Covid-19 pandemic exposed and amplified a multitude of weaknesses in the current food systems around the world. In response, the Center directed its attention especially to the problems associated with: animal agriculture production and processing; increasing food insecurity; and the lack of resilience in food systems.

OUR PARTNERS

In addition to our in-house research, education, and practice, the Center works with a number of coalitions that expand our ability to support policy initiatives. The National Sustainable Agriculture Coalition (NSAC), The Food Chain Workers Alliance, Health Care Without Harm, and the Health, Environment, Agriculture, Labor Alliance (HEAL) are among our important partners. Some of the policy priorities outlined in this document have been informed to varying degrees by our partners' goals.

To further discuss policy recommendations, contact Bob Martin, Program Director, Food System Policy (rmarti57@jhu.edu).