
June 21, 2021

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

Disclaimer: The opinions expressed herein are our own and do not necessarily reflect the views of The Johns Hopkins University.

Dear Dr. Bailey,

Thank you for the opportunity to comment on Supply Chains for the Production of Agricultural Commodities and Food Products (Docket number [AMS-TM-21-0034](#), page 26689). The [Johns Hopkins Center for a Livable Future \(CLF\)](#) is an interdisciplinary research center based at the Johns Hopkins Bloomberg School of Public Health. CLF applies science and systems thinking to help build healthy, just, equitable, resilient, and sustainable food systems. CLF is a member of the National Sustainable Agriculture Coalition (NSAC), an alliance working to advance the sustainability of agriculture, food systems, natural resources, and rural communities.

Recently, Americans have experienced an economic crisis brought on by the COVID-19 pandemic, natural disaster and climate change-related disruptions, and ransomware attacks, all of which have revealed the fragility and vulnerability within the system. [Feeding America](#) estimated that in 2020, 45 million people, including 15 million children, experienced food insecurity. A recent survey of U.S. households found that during the first four months of the pandemic, household food insecurity increased by nearly one-third, and the majority of households experiencing food insecurity included children ([Harper et al, 2020](#)). The ransomware attack on JBS, the world's largest meat producer, in late May 2021, shut down processing plants for two days. This "roiled the U.S. food industry, from hog farms in Iowa to small-town processing plants and New York restaurants. The hack set off a domino effect that drove up wholesale meat prices, backed up animals in barns and forced food distributors to hurriedly search for new suppliers" ([The Wall Street Journal](#), 6/11/2021). JBS controls about 20% of the slaughtering capacity for cattle and hogs in the U.S. ([Reuters](#), 6/1/2021).

Given these and other threats to food systems, strengthening local and regional food infrastructure is one clear way to mitigate vulnerability while also supporting rural economies and conserving resources. While COVID-19 did not create the problems within food systems, it did elucidate and expose structures that are "rigid, consolidated, and fragile," [as Secretary Vilsack said](#). The pandemic also highlighted the many social, economic, and racial inequities perpetuated by the current food systems that have disproportionately burdened food systems workers, communities of color, and low-income households.

As the U.S. Department of Agriculture (USDA) prepares to invest in supply chains through the Build Back Better Initiative, the agency has the opportunity to create lasting benefits to the economy, public health, and the environment and ready the country to better withstand future threats. In order to enhance overall systems resilience, USDA should take action to **prioritize local and regional food systems, support small and mid-size producers, and further incentivize sustainable and equitable practices.** Ongoing

monitoring and evaluation of these efforts will be invaluable to gauge progress and scale promising programs. Our recommendations below are not exhaustive and do not address every aspect of supply chains, but do highlight from CLF's perspective several key avenues that USDA should use to bolster resilience in the areas of production, processing, aggregation/distribution, markets/consumers, and across the supply chain.

Production

- Ensure high-level oversight at USDA to coordinate the agency's efforts to facilitate access for young, beginning, and Black, Indigenous, and People of Color (BIPOC) farmers. Specifically:
 - Improve access to credit for young, beginning, and BIPOC farmers through the Farm Service Agency (FSA) ([Rippon-Butler 2020](#)).
 - Increase investment in and expand the set-aside for young, beginning and BIPOC farmers in conservation programs including the Environmental Quality Incentives Program (EQIP), Conservation Reserve Program (CRP), Conservation Stewardship Program (CSP), and Regional Conservation Partnership Program (RCPP) ([Rippon-Butler 2020](#)).
 - Conduct targeted outreach on the Conservation Reserve Program-Transition Incentives Program (CRP-TIP) to increase participation and facilitate land transition to young, beginning and BIPOC farmers. ([Rippon-Butler 2020](#); [NSAC Food and Agriculture Priorities for Administrative Action](#)).
- Coordinate across USDA to review various conservation programs and ensure they align in supporting farmer and rancher efforts to mitigate the impacts of climate change as well as help insulate the food system from climate disruption, public health crises, and other stresses. More specifically, we support NSAC's recommendation to establish a "Farm Service Agency (FSA) team to transform the CRP into a climate and water quality program, align crop insurance Good Farming Practices (GFP) to better support conservation, improve and accelerate adoption of cropping management plans to build soil health, and create the Soil Health and Greenhouse Gas Federal Advisory Committee" ([NSAC Food and Agriculture Priorities for Administrative Action](#)).
- Routinely share findings and best practices from Value-Added Producer Grant (VAPG) program grantees.

Processing

- Allow distribution of meat from state-based, federally inspected slaughter facilities across state lines.
- Through the Meat and Poultry Inspection Readiness Grant (MPIRG) program, increase local and regional processing access for small and mid-sized producers in order to benefit rural communities, workers, and the environment. Additionally, enhance coordination and collaborations with tribal communities, new and beginning farmers and ranchers, socially disadvantaged producers and veteran producers interested in building capacity.
- Food Safety Inspection Service (FSIS) should actively engage with small meat and poultry producers and recognize them as essential infrastructure. Specifically:
 - Ensure the National Advisory Committee on Meat and Poultry Inspection has at least an equal number of independently owned, small-plant stakeholders serving on the

Committee as the largest meat and poultry companies, including at least one farmer or rancher who uses small-scale slaughter plants.

- Work to increase the number of small plants that have a grant of federal inspection.
- Publish a proposed rule for comment that ensures a transparent and accurate “Product of the USA” label for livestock born, raised, harvested, and processed in the U.S.
- Additional recommendations and details on the three prior bullets are on page 39 of the [NSAC Food and Agriculture Priorities for Administrative Action](#).

Aggregation/Distribution

- Fund advancements to regional infrastructures for storage and transport of food to ensure systems have surplus capacity, built-in flexibility and are diversified in terms of transportation and spatial distribution ([Harris & Spiegel, 2019](#)).

Markets/Consumers

- Prioritize Local Agriculture Marketing Program (LAMP) grant program applications that are submitted by, or intend to serve, beginning farmers or ranchers, socially disadvantaged farmers or ranchers, operators of small- or mid-sized farms or ranches that are structured as family farms, and veteran farmers or ranchers ([NSAC Transition Team Document](#)).
- Prioritize regional producers in The Emergency Food Assistance Program (TEFAP) produce boxes.
- Allow schools to continue providing free meals to all children, even after the 2021-2022 school year.
- Improve access to and availability of online food ordering and delivery for SNAP and WIC participants ([Robinson et al, 2020](#)).

Across the Supply Chain

- Spearhead a cross agency ‘Regional Resilience Initiative’ focused on how the development of more robust local and regional food systems can boost community food security and resilience in the face of disruptions such as the ongoing coronavirus pandemic. ([NSAC Food and Agriculture Priorities for Administrative Action](#)).
- Create a Local and Regional Food Systems Resiliency Director position within the Office of the Secretary to identify opportunities and coordinate existing USDA resources to better serve and promote resilient local and regional food systems ([NSAC Food and Agriculture Priorities for Administrative Action](#)).
- The Agricultural Marketing Service should conduct applied research, virtual outreach, and distance learning to help farmers, food businesses, food assistance organizations, and food market managers respond more successfully to severe disruptions in food supply chains ([NSAC Food and Agriculture Priorities for Administrative Action](#)).
- Continue Regional Food System Partnerships funding and routinely share findings and best practices from grantees. Highlight effective strategies to address food supply chain vulnerabilities within local disaster preparedness, all-hazards and climate adaptation planning.

CLF appreciates USDA’s commitment to supply chain improvements that will advance food systems that are more resilient through diversification, flexibility, and adaptability. This comes in many forms along the supply chain, from farmers adopting flexible production practices and diversifying agricultural methods and systems to institutions’ flexibility and adequate supply chains to allow procurement from local producers ([Harris & Spiegel, 2019](#)). It also means that in times of crisis, there is excess capacity to meet increased demand. In addition to the specific actions outlined in this letter, it is important to acknowledge the importance of centering food system workers and equity in these efforts. Food system workers lack many basic protections afforded workers in other industries, often leaving them vulnerable to occupational and environmental hazards. When workers receive the rights and protections they deserve, such as health care benefits, paid sick leave, and hazard pay, it strengthens the collective system ([Goldman et al, 2021](#)). Economic justice and racial equity should be considered as key outcomes for all actions to strengthen food supply chain resilience.

Thank you again for the opportunity to comment.

Sincerely,

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