



## Consumer Federation of America

June 21, 2021

Honorable Thomas J. Vilsack  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

### *ONLINE SUBMISSION*

RE: Supply Chains for the Production of Agricultural Commodities and Food Products, Document Number AMS-TM-21-0034

Dear Secretary Vilsack:

Consumer Federation of America appreciates the opportunity to share our perspective on how the U.S. Department of Agriculture can help to create a “resilient, diverse, and secure” food supply chain, consistent with the President’s Executive Order 14017. The food system can do much more to “support small businesses, promote prosperity, advance the fight against climate change, and encourage economic growth in communities of color and economically distressed areas.” Longstanding federal policy—such as many agricultural subsidy programs—have stymied progress towards these goals and will require congressional action to reform. Nevertheless, USDA wields ample authority through its regulatory and procurement activity to make considerable strides toward a more resilient food system.

The COVID-19 pandemic exposed rigidities in food supply chains that more robust local and regional food systems could help to ameliorate. USDA should explore ways that its federal food procurement can support smaller providers, and in particular, look at how it can build on existing values based purchasing programs. Such programs are already helping to transform the food system across the country. For example, the Good Food Purchasing Program currently guides the food purchasing decisions of 43 enrolled institutions and local coalitions—representing hundreds of organizations—in 16 cities across the country. Five core values—developing local economies, maintaining nutrition, supporting a valued workforce, promoting environmental sustainability, and protecting animal welfare—drive food purchasing decisions under the program, which uses a point scale to measure progress and ensure accountability for participants.<sup>1</sup> Another organization, the Urban School Food Alliance, leverages the purchasing power of millions of students in fifteen of the country’s largest school districts to create demand for nutritious, sustainable, and locally sourced food. Indeed, the Alliance’s procurement policy played a key role in pushing the chicken industry to dramatically reduce its use of antibiotics.<sup>2</sup> USDA should make similar impacts with its procurement

---

<sup>1</sup> See <https://goodfoodpurchasing.org/>

<sup>2</sup> <https://urbanschoolfoodalliance.org/our-impact/>

policy. The National School Lunch Program alone spends over \$14.1 billion per year.<sup>3</sup> Given the size of USDA's purchasing power, even moderate incentives will make a big difference.

USDA must also use its regulatory authority to create a more resilient food system. In particular, it must establish a level-playing field for all producers. The Department's renewed work on rules to support enforcement of the Packers and Stockyards Act is a step in the right direction. The Department of Justice should also take a more active role in coordinating with USDA on anti-trust enforcement. Corporate consolidation has a pernicious effect on the food system, from farm to processor to retail. To cite just one example, currently two companies—Aviagen and Cobb-Vantress, Inc., the latter owned by Tyson Foods—supply virtually all of the poultry breeding stock in the U.S. As a result, a poultry company that wants to keep dangerous *Salmonella* strains out of its production lines has little recourse if the chicks that it receives turn out to be contaminated, and consumers, in turn, face increased food safety risk.<sup>4</sup> Where USDA cannot fully restore competitive conditions to the marketplace, it should use its regulatory authority to correct distortions such as these.<sup>5</sup>

Measures to increase transparency should be an important part of USDA's resiliency strategy. To address the poultry industry's *Salmonella* problem referenced above, one practically zero cost solution entails simply disclosing the whole genome sequencing data that the Department's Food Safety and Inspection Service currently generates, both to the establishments from which samples are taken, and to the public writ large. This data should alert poultry processors of heightened food safety risk, and could help to put pressure for better risk management at the breeder companies.<sup>6</sup> Greater transparency can promote a more resilient food system in other ways too, such as mandatory country of origin labeling on foods,<sup>7</sup> a national registry of all gene-edited crops in the U.S. food supply,<sup>8</sup> and basic data about the medically important antibiotics being fed to farm animals.<sup>9</sup>

Many strategies to make the food system more resilient and improve public health outcomes will disproportionately benefit low-income and socially disadvantaged populations. This is because problems like foodborne illness currently have a disparate impact on these communities. Indeed, research shows that living in poverty puts consumers, particularly those under five years of age, at higher risk of infection from foodborne pathogens such as *Campylobacter*, *Salmonella*, and *Shigella*.<sup>10</sup> Like so many public policy dilemmas, foodborne illness illustrates the interconnectedness of the food system with healthcare, education, criminal justice, and other societal elements shaped by systemic racism. Fortunately, the causal pathways run in both directions. By facilitating a more

---

<sup>3</sup> <https://www.ers.usda.gov/topics/food-nutrition-assistance/child-nutrition-programs/national-school-lunch-program/>

<sup>4</sup> <https://www.cdc.gov/salmonella/infantis-10-18/index.html>

<sup>5</sup> See, e.g. <https://consumerfed.org/testimonial/consumer-food-safety-groups-petition-usda-for-action-on-poultry-pathogens/>

<sup>6</sup> See <https://thehill.com/opinion/energy-environment/476715-we-need-a-clear-vision-into-food-safety-for-2020>

<sup>7</sup> [https://consumerfed.org/press\\_release/large-majority-of-americans-strongly-support-requiring-origin-information-on-fresh-meat/](https://consumerfed.org/press_release/large-majority-of-americans-strongly-support-requiring-origin-information-on-fresh-meat/)

<sup>8</sup> <https://cspinet.org/news/biotech-blog-national-registry-gene-edited-crops>

<sup>9</sup> <https://www.keepantibioticsworking.org/blog/antibiotics-data-collection>

<sup>10</sup> [https://consumerfed.org/press\\_release/new-report-highlights-disparate-impact-of-foodborne-illness-on-poor-and-minority-communities/](https://consumerfed.org/press_release/new-report-highlights-disparate-impact-of-foodborne-illness-on-poor-and-minority-communities/)

resilient food system, USDA will support policies that promote a more equitable and socially just food system, and those policies, in turn, will help to transform society as a whole.

Thank you for your consideration of these comments.

Sincerely,

Thomas Gremillion  
Director of Food Policy  
Consumer Federation of America