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Re: Supply Chains for the Production of Agricultural Commodities and Food Products (AMS-TM-21-0034)

Dear Dr. Bailey:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the United States Department of Agriculture related to its comment request for the Proposed Rule “Supply Chains for the Production of Agricultural Commodities and Food Products (AMS-TM-21-0034).” Representing over 112,000 registered dietitian nutritionists (RDNs), nutrition and dietetic technicians, registered (NDTRs), and advanced-degree nutritionists, the Academy is the largest association of food and nutrition professionals in the United States. We are committed to accelerating improvements in the nation’s health and well-being through food and nutrition.

The Academy of Nutrition and Dietetics applauds USDA’s efforts to examine what policies and practices have resulted in the United States’ vulnerable food system. This vulnerability, magnified during the COVID-19 national emergency, led to disruptions in access to food and water for many Americans and disproportionately impacted people with diet-related chronic disease and communities of color. Efforts should focus on addressing this issue by applying a sustainable, systems approach to our food, water and nutrition policies.

A. Sustainable Food Systems

The relationships between diet quality, consumer demand, food supply and other factors within the food system are complex. The Academy recognizes that dietary intake does not exist in isolation from broader food systems issues and this fact has been magnified in the wake of the COVID-19 pandemic.

As previously stated in our comments in response to the scientific committee report of the *Dietary Guidelines for Americans*, “An analysis of 2014 loss-adjusted food availability data by the [Economic Research Service] determined that, even when including imports, [America’s per capita availability of vegetables and fruit falls short of current dietary recommendations.] Population-wide improvements in diet quality will require multiple approaches and inter-agency coordination. Developing food systems in which dietary guidance aligns with the reality of food production may require not only promoting consumer demand for nutritious foods and closing

gaps through food waste reduction efforts, but inter-agency coordination to develop policies that facilitate the production of nutritious foods....”¹

Diet quality relies not only on the availability of nutritious food, but also on the availability of safe water. At least 460,000 U.S. households lack plumbing facilities, and these households are disproportionately low-income, Native Alaskan, American Indian, African American or Hispanic. These populations are also more likely to be served by systems which recently violated Safe Drinking Water Act standards — a total of about 45 million Americans. Thus, a significant gap between potable water supplies and water needs remains.”²

“A question that requires further investigation is the resource use and environmental impact of specific dietary patterns. A growing body of literature increasingly points to not only potential co-benefits but also potential trade-offs between diet quality and environmental impact.”³ **To examine these crucial relationships, and to form effective policies, the Academy encourages a cross-disciplinary approach to researching, developing and implementing systems-based policies to promote population and environmental health.** “The Academy supports efforts to create a sustainable overall food system . . . [and recognizes] the intense public interest in ‘evaluating sustainability of recommended dietary patterns, addressing the social and economic aspects of access to foods that are components of healthy dietary patterns, and considering systemic changes to encourage behavior change consistent with the dietary guidelines recommendations.’”⁴

¹ Academy Comments to USDA and HHS re Scientific Report of the 2020-2025 Dietary Guidelines Advisory Committee (“Academy Comments re 2020-2025 DGAC Scientific Report”). Academy of Nutrition and Dietetics website. Available at <https://www.eatrightpro.org/-/media/eatrightpro-files/news-center/member-updates/dga/academy-comments-to-usda-and-hhs-re-scientific-report-of-the-dgac.pdf?la=en&hash=4164D3A0BD2324341BD3BE973065BDA0357FF2BC>. Accessed June 21, 2021 (*citing* Buzby JC, Wells HF, Hyman J. The Estimated Amount, Value, and Calories of Postharvest Food Losses at the Retail and Consumer Levels in the United States. U.S. Department of Agriculture, Economic Research Service. Economic Information Bulletin Number 121. February 2014; Spiker ML, Hiza HAB, Siddiqi SM, Neff RA. Wasted Food, Wasted Nutrients: Nutrient Loss from Wasted Food in the United States and Comparison to Gaps in Dietary Intake. *J Acad Nutr Diet.* 2017;117(7):1031-1040.e22).

² Academy Comments re 2020-2025 DGAC Scientific Report (*citing* U.S. Census Bureau; American Community Survey (ACS): Tenure by Plumbing Facilities, 2010-2018. Available at <https://data.census.gov/cedsci/all?q=%20plumbing%20american%20community&hidePreview=%20false&tid=ACSDT1Y2018.B25049>. Accessed April 3, 2020; Deitz S, Meehan K. Plumbing Poverty: Mapping Hot Spots of Racial and Geographic Inequality in U.S. Household Water Insecurity. *Ann. Am. Assoc. Geogr.* 2019;109(4):1092-1109. doi:10.1080/24694452.2018.1530587; Fedinick KP, Taylor S, Roberts M. Watered Down Justice. Natural Resources Defense Council, Coming Clean and Environmental Justice Health Alliance. Available at <https://www.nrdc.org/sites/default/files/watered-down-justice-report.pdf>. Published 2019. Accessed April 3, 2019; and Nilsen E. What we know about the fourth coronavirus relief bill. *Vox.com.* <https://www.vox.com/2020/4/3/21206931/what-we-know-about-congress-fourth-coronavirus-bill>. Accessed April 3, 2020).

³ Academy Comments re 2020-2025 DGAC Scientific Report at 51.

⁴ Academy Comments re 2020-2025 DGAC Scientific Report at 7 (*citing* Wood-Wright, Natalie. “New U.S. dietary guidelines ignore broad support for food sustainability.” *Hub*, Johns Hopkins University, Mar 11, 2016, <https://hub.jhu.edu/2016/03/11/dietary-guidelines-sustainability-survey/> (“Nearly three-quarters of adults surveyed believe U.S. Dietary Guidelines should include environmental provisions and support sustainable agriculture practices.”); *quoting* Dietary Guidelines Advisory Committee. 2020. Scientific Report of the 2020 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Agriculture and the Secretary of Health and

B. Local and Regional Food Systems

The pandemic has illuminated the susceptibility of the United States and the world's food systems. Loss of markets have resulted in severe agriculture and economic impacts putting the most stress on vulnerable communities leaving millions food insecure and food supplies wasted. In line with the Lancet Commission: The Global Syndemic of Obesity, Undernutrition, and Climate Change⁵, **the Academy suggests that priority be given and appropriate funding be used to examine long-term solutions that leverage more local and regional food systems** while supporting immediate recovery programs that will ensure food be available for millions of food insecure Americans and support growers, suppliers, and distributors.

1. *USDA Support for State & Local Food Purchase Programs*

As USDA considers how to allocate funds to support the U.S. food supply chain, **the Academy urges USDA to leverage and build upon already established successful programs and to encourage those programs to be scaled up.** One example is the Farm to Food Bank agriculture surplus program. Each state varies in how they approach the program and which state agencies works with food banks – whether it is the U.S. Department of Agriculture, Human Services, or Education. The program provides state funding to food banks or food bank state associations to coordinate the purchase of local foods produced in a state that would otherwise go to waste. Involving state agencies with familiarity in working with the emergency food system would provide a transparent and clear way for interested nonprofits with the capability to safely distribute food to participate in any food purchase programs.

During an informal listening session conducted by the Academy, one member reported that, “Farms make up over 85% of land in Iowa and brings in billions of dollars to our economy. We are ranked as the second largest agriculture state. Although Iowa is known as an agriculture state, we do not feed people. Most of our land is used to produce soybeans and corn and we import most of the food we buy in our grocery stores; however, a large group of Iowans are calling for innovation and transformation of the food system to support local and regional food systems and support a fair, equitable, and healthy food system.” This situation is not unique to Iowa; we have heard similar reports from members in Montana, North Dakota and New Mexico. Many of these members reported that establishment of more efficient and accessible local food systems were challenging because of lack of technical assistance, limited incentives to make the change and poor or nonexistent supply chains that could make transformation financially and practically feasible.

2. *USDA Investment in Infrastructure to Support Local Growers*

The Academy suggests that USDA look at additional programs and systems to identify challenges for local growers, suppliers and distributors to contribute to a local/regional sustainable food system. According to an Academy member in North Dakota, “It has been challenging for small, local food growers or distributors to take advantage of USDA relief

Human Services. U.S. Department of Agriculture, Agricultural Research Service, Washington, DC at 5).

⁵ The Global Syndemic of Obesity, Undernutrition, and Climate Change: The Lancet Commission report. BA Swinburn, VI Kraak, S Allender, VJ Atkins. Lancet (London ... , 2019 - europepmc.org. Author: Swinburn BA, Journal: Lancet (London, England)[2019/01].

opportunities; the price of their goods is higher than large organizations through economies of scale, there are transportation issues to get food where it needs to go, and lack of value chain and infrastructure. While some smaller growers were able to participate in Farmers to Families Food Boxes, for example, others didn't have the means to know about the opportunities or get the food where it needed to go." Even food rescue through the charitable food network face challenges to support local growers. "Transportation and distribution costs are one of the largest barriers to sourcing local nutritious food and distributing it into communities. Often there is more produce available for donation or low-cost purchase than a state or area can handle," reports an Academy member who works closely with the emergency food network. An Academy member from New Mexico added, "Even if USDA invested in cold storage, food hubs and local processing centers, more small growers could support their local and regional food systems." Lastly, an Iowa Academy member shared this example, "One county in Iowa will get millions of dollars from USDA in various forms of crop subsidies; however, none of that money goes to help fruit and vegetable growers, or to help start a vegetable freezing facility or a small facility for turning soybeans into tofu or wheat into flour or oats into rolled oats, or to help start a food hub to aggregate local supplies to serve local institutional food buyers like a school district."

C. Access to Federal Nutrition Programs

The Academy is committed to improving the health of Americans by ensuring access to a nourishing, safe and affordable food supply. The dietetics practitioner and nutrition educators consider the health, safety and welfare of the public at all times. The Academy's guiding principle is our commitment to improving health for all, especially those most susceptible to food insecurity. It is the position of the Academy that systematic and sustained action is needed to achieve food and nutrition security in the United States. To achieve food security, effective interventions are needed, along with adequate funding for, and increased utilization of, food and nutrition assistance programs; inclusion of nutrition education in such programs; strategies to support individual and household economic stability; and research to measure impact on food insecurity and health related outcomes.⁶ **The Academy recommends that USDA thoroughly review the critical federal nutrition programs such as Supplemental Nutrition Assistance Program, SNAP Education, Gus Schumacher Nutrition Incentive Program, the Special Supplemental Nutrition Program for Women, Infants, and Children, and school meals to ensure low-income individuals have access to healthy, safe and culturally-appropriate food.**

1. Increase Investment to support access to the Supplemental Nutrition Assistance Program

During the COVID-19 pandemic, many low-income families were forced to decide between eating and exposing themselves to the virus. Although large grocery chains were able to quickly get online options up and running, it still remained a challenge for some low-income families to use their benefits whether it be because they could not afford transportation fees or they lived in areas where large grocery chains were not able to deliver. As these gaps in service will continue to impact vulnerable communities, the Academy urges USDA to examine what more can be done to support cost of transportation and technical assistance to smaller grocers and stores without the capacity to fully utilize the SNAP online option. **Additionally, SNAP-Ed providers**

⁶ Holben, D. (2010). Position of the American Dietetic Association: Food Insecurity in the United States. Journal of the American Dietetic Association. 110(9), 1368-1377.

are a critical resource within vulnerable communities to help recipients and providers develop solutions to access issue. USDA should maximize the utility of these trusted providers.

2. Gus Schumacher Nutrition Incentive Program

The Academy urges USDA to prioritize programs like GusNIP that provide access to fruits and vegetables especially in high need communities. The Double Up Food Bucks program, created in Michigan by the Fair Food Network and expanded to grocery stores in 2013, is one of the best examples of success in incentivizing healthy foods by using GusNIP grant resources. The program allows SNAP participants to receive a voucher in the amount used to buy fruits and vegetables; meaning if a customer purchases \$4 of fruits and vegetables, he or she receives a voucher for \$4 towards a future purchase of fruits and vegetables.

One Academy member reported the benefit of GusNip in an Academy listening session, “Our identity as an agricultural state is very important to most Iowans, from the farmers that understand the value of their farmland for a healthy and sustainable future, to Iowans that are struggling with food insecurity, and even Iowa politicians that see the benefit of connecting state health outcomes with the state’s agriculture’s economic viability. The SNAP incentive program in Iowa, Double Up Food Bucks, has been a benefit to local and regional specialty crop farmers, state retail stores and Iowans that are struggling with food insecurity. The program is so well utilized that it is close to being out of funding for this year, which is a sign of the desire, need and utilization of the program; however, it is also an indicator that the program needs additional support and funding.”

3. The Special Supplemental Nutrition Program for Women, Infants, and Children

USDA can look to the WIC Cash Value Benefit as a program to help support the supply chain for low-income families and growers. With shortages of WIC items on the shelf, increased cash value benefit (CVB) value will ensure WIC participants have sustained access to nutritious foods throughout the public health emergency. There is also concern that farmers will continue to be impacted by the pandemic with the decreased outlets for produce. By providing more purchasing power for fruits and vegetables, we can support efforts to reduce food waste and support farms. **The Academy urges USDA to permanently increase the CVB. Lastly, the Academy suggests making some of the physical presence flexibilities from the pandemic permanent to improve access to the program.**

4. The Emergency Food Assistance Program

USDA has a strong history of making commodity support purchases and distributing those purchases through USDA Food Distribution Programs like TEFAP. USDA should consider what commodity support can be accomplished using this proven method of USDA food purchase and distribution, provide funding to nonprofits to support the costs of any food distribution and identify what food purchases and grower support need a more flexible procurement structure. For example, USDA was able to provide support to many growers and producers impacted by trade issues in 2019 and 2020 through the Food Purchase and Distribution Program. A commodity support model like this would also provide a proven equitable system to ensure communities receive appropriate allocations of foods offered.

D. Food Safety and Traceability

The pandemic has also emphasized the urgency to finalize updates to food safety and traceability regulations to ensure the safety of the food distributed through our supply chain. In 2010, the Academy adopted the following food safety principles for federal food safety authority in the United States:

1. Food authority should be science-based and consistently applied to all food regulated by all agencies for domestic and imported foods. The Academy supports the concept of a single food safety agency to protect the public's health.
2. Food authority should be collaborative across national, state and local agencies and between government and industry partners to foster more robust, consistent, accurate, and timely communication and data sharing that leads to efficient and effective decision-making processes.
3. Food protection should include statutory authority by government regulatory agencies for traceability and recall, supported by research, epidemiology and inspection programs.⁷

The Academy supports efforts to improve traceability by harmonizing information requirements for foods on the Food Traceability List (FTL) throughout the supply chain by strengthening recordkeeping requirements to ensure entities that manufacture, process, pack, or hold foods on the FTL keep records of information associated with key data elements (KDEs) at critical tracking events.

E. Future Considerations

1. *Create a Cross-Agency Sustainable Nutrition Task Force*

The Academy acknowledges and appreciates the Biden-Harris Administration's renewed focus on climate, resilience and sustainability. Prioritizing these issues are critical not only from an agriculture perspective but from a nutrition perspective, especially given the crucial role nutrition and diet-related diseases played in the complications experienced by COVID-19 patients and the significant increase in food insecurity and disruption in food and water access. **The Academy suggests examining the benefits of the creation of an inter-agency task force to review current policies and practices and develop a road map to adjust government policies and practices towards a systems approach to food, nutrition and agriculture.**

2. *Include the Relationship of Sustainability and Dietary Patterns in the Next Iteration of the Dietary Guidelines for Americans*

The Academy supports effort to consider the *Dietary Guidelines for Americans* in relation to sustainability of the U.S. food system for the 2025-2030 iteration and urges the Biden-Harris Administration to support cross-disciplinary standards of evidence to ensure the Dietary Guidelines Advisory Committee are equipped to incorporate a wider range of innovative research in this area.

3. *Increase Funding for Research Efforts on Sustainable Nutrition and Agriculture*

The Academy supports efforts to increase funding for nutrition and agriculture research. For example, the Academy endorsed the bipartisan America Grows Act of 2019, which prioritizes

⁷ J Acad Nutr Diet 2014 Nov;114(11):1819-29. doi: 10.1016/j.jand.2014.08.023. Epub 2014 Oct 24.

funding for an expanded and sustained national investment in agriculture research.

F. Conclusion

The Academy appreciates the opportunity to submit comments to the United States Department of Agriculture related to its comment request for the Proposed Rule “Supply Chains for the Production of Agricultural Commodities and Food Products.” We urge USDA to prioritize and invest in the strategies to strengthen and stabilize our food system including investing in nutrition and agricultural research, expanding and strengthening access to and implementation of federal nutrition programs, and using a sustainable systems approach to restructuring our country’s supply chain.

Sincerely,



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