Dear Dr. Bailey,

The New England State Food System Planners Partnership (The Partnership) and Food Solutions New England (FSNE) are pleased to share our comments in response to the AMS Federal Register notice, “Supply Chains for the Production of Agricultural and Food Products”.

INTRODUCTION

Through our collaborative efforts, The Partnership and FSNE work to strengthen the regional food economy of the six New England states (ME, VT, NH, MA, RI, and CT). We believe that the strongest and most resilient agricultural supply chains are those rooted in the interests and ownership of the communities they serve, working towards a common vision and set of aspirations to guide investment and infrastructure, planning and research, policy decisions, and efforts to advance justice and equity.

USDA can advance these efforts through:

1. Addressing systemic issues of inequity and injustice in programs, policies, and throughout the food system;
2. Developing and implementing production benchmarks to increase regional food production for regional consumption;
3. Conducting regional market demand and infrastructure assessments to inform policy and investments that will support reaching regional production targets;
4. Facilitating a supply chain assessment to address the location of key manufacturing and production assets;
5. Expanding funding for regional and national networks and partnerships between individuals, businesses, NGOs, and government entities, like the Regional Food Systems...
Partnership (RFSP) grant program and funding for networks of beginning farmers and ranchers;
6. Providing support for the formation of regional food hub networks;
7. Developing a regional climate action plan that includes food and agriculture; and
8. Integrating food systems into hazard mitigation, emergency management, and land use planning efforts.

We appreciate USDA’s direct acknowledgement of the “disproportionate impacts on socially disadvantaged communities” in the Federal Register notice, some of which were caused and perpetuated by USDA’s own policies, and encourage the agency to continue centering the needs of these communities throughout the implementation of the Executive Order. USDA will succeed in strengthening and securing America’s food supply chain resilience only by meaningfully addressing systemic issues of inequity and injustice in its programs.

Above all, to meaningfully advance agricultural supply chain resilience, USDA must invest in solutions that:

1. Support local and regional collaborative food systems planning and implementation, for example through the funding of partnerships and networks;
2. Foster cross-sectoral coordination, for example through initiatives that tie together food and land access, nutrition and health, transportation, and sustainable production practices;
3. Evaluate policies based on their ability to support diverse ownership models and sizes of businesses, including cooperatives and publicly owned infrastructure; and
4. Emphasize systemic solutions that address the root causes of inequity and vulnerability in agricultural supply chains, rather than solely addressing symptoms.

In this comment letter we focus on ways USDA can help advance local and regional food systems and supply chains that are more equitable, sustainable, reliable, and resilient, with specific reference to the relevant sections of the Federal Register Notice.

BACKGROUND: Cultivating a Reliable & Resilient Regional Food Supply Chain in New England

FSNE’s A New England Food Vision calls for New England to produce at least 50% of our food by the year 2060 while supporting healthy food for all, sustainable farming and fishing, and thriving communities. The New England Feeding New England: Cultivating a Reliable Food Supply Project (NEFNE), a 10-year initiative funded in part by USDA Regional Food Systems Partnership grant #AM200100XXXXG100, is working towards an interim goal for 30% of the food consumed in New England to be produced or harvested in New England by 2030.
The NEFNE project is a critical component of achieving the shared goals laid out in the New England Food Vision and is preparing the region for system shocks such as climate change-related weather events and public health emergencies. The project goal is to increase regional food production for regional consumption by expanding the region’s food supply and distribution systems and strengthening the capacity of the region to respond to a variety of rapidly changing climate, environmental, and public health conditions.

The Partnership is working with researchers, subject-matter experts, policy analysts, government officials, and community representatives to improve the reliability and strength of the regional supply chain.

Priority activities include:

- Developing benchmarks for production by food category in each state to achieve the goal of producing 30% of the food consumed in New England by 2030;
- Conducting a market demand study to analyze consumption and purchasing patterns and identify the potential demand for increased direct to consumer, institutional, and retail procurement of regionally produced food;
- Conducting an infrastructure needs assessment to determine the production, distribution, and supply chain needs required to realize the production targets and meet market demand;
- Collaborating with farm and food systems researchers, stakeholders, and leaders who reflect the geographic, age, gender, racial, and ethnic diversity that make up our region and bring an equity lens to these planning efforts; and
- Developing and publishing a policy and action guidance document with a detailed plan for achieving the production targets.

Increased regional food production, a supportive distribution system, and sufficient infrastructure will mitigate the vulnerabilities in our region that have become all too apparent during the COVID-19 pandemic. Resilient regional food economies increase domestic production of food, manufacturing and processing efficiency, and employment -- all leading to a stronger local economy and a supply chain that can equitably serve the region’s population when the food supply chain is under threat. Strengthening the regional food economy in New England will ensure security in our supply chains, improve public health, advance racial equity, and foster economic prosperity in the face of climate disasters and public health emergencies.

**RESPONSE TO SEC. ii AND iii OF THE FEDERAL REGISTER NOTICE:**
Support Collaboratively-Designed, Community-Led Supply Chain Assessments That Advance Equity in Economic Development
The Executive Order states the need for Sectoral Supply Chain Assessments (Sec. 4(c)(V)(D)). To advance the resiliency of New England’s local and regional food economies, USDA should support the completion of comprehensive, collaboratively-designed (including socially disadvantaged communities as core participants) Supply Chain Assessments for the New England food system. These efforts should be designed to support strategic infrastructure investments that simultaneously create jobs, support small businesses, and advance racial equity in economic development. In particular, the Supply Chain Assessment should seek to investigate variables such as the location, ownership characteristics, production levels, and production capacity of key assets in a way that maintains confidentiality where appropriate.

Among others, key manufacturing and production assets to be assessed (including through methods such as geospatial analysis) should include:

A. Location of arable agricultural land in the region (including urban lots that are suitable for farming and a consideration for which arable lands are available to Indigenous people);
B. Location of clean water for commercial fishing; and
C. Location of processing (including shared use kitchens), distribution (including food hubs), retail (including CSAs, farm stands, farmers markets), access (including pantries, banks, giving gardens), and composting facilities.

To facilitate the assessment of regional supply chains, as well as the tracking of progress, USDA should consider updating the way it administers annual NASS surveys. These surveys provide useful data, however small-scale production is currently not included. This is a missed opportunity for tracking and managing essential components of regional supply chains, especially in the case of small states like those in New England. USDA should consider dedicating the resources necessary to conduct annual crop and commodity surveys in all states for all products regardless of the size of production. An annual count of crop production in every state would provide valuable data to measure, manage, and plan for regional supply chain demand.

RESPONSE TO SEC. v (H) OF THE FEDERAL REGISTER NOTICE:
Support Food Systems Networks to Improve Decision-Making and Spur Collaboration

USDA should expand its support for regional and national networks and partnerships between individuals, businesses, NGOs, and government entities, like the Regional Food Systems Partnership (RFSP) grant program. Recipients of the RFSP grant are able to leverage this federal funding to secure additional private funding, thereby accelerating the planning and implementation efforts to build resilient regional food economies and maximize the buy-in and investment within the region to support these accomplishments.
USDA may also consider expanding and diversifying its funding for networks of beginning farmers and ranchers, thereby helping to magnify the impact and spread of lessons learned while augmenting the capacity to collaboratively develop sector strategies that improve resiliency.

Other existing partnership- and network-based program models to look to in improving and augmenting USDA's community-based supply chain investments include Federal grant programs as well as NGO-led network and training organizations.

Two Federal grant programs that have shown promise in supporting community-led food systems collaboration are:

- Healthy Food Financing Initiative (HFFI) at USDA, especially the Community Economic Development program (CED-HFFI) and Community Development Financial Institutions Fund (CDFI)
- Refugee Agricultural Partnership Project (RAPP) at DHHS ORR

Three NGO-led network and training organizations to view as potential models include:

- Agriculture and Land-Based Training Association (ALBA) based in Salinas, CA
- Farmer Veteran Coalition based in Sacramento, CA
- Practical Farmers of Iowa based in Ames, IA
- Agriculture Viability Alliance based in New England

To catalyze the investment and innovation towards a more just and resilient food system, USDA can also do more to support small-scale food and farm business owners via expanded investment in networks of service providers offering Business Technical Assistance (BTA). There is currently no dedicated, long-term Federal support for Business Technical Assistance targeted at food and agriculture producers, according to the Agriculture Viability Alliance, which is requesting a set-aside of $300 million for multi-year BTA grants by USDA using American Rescue Plan Act funding.

USDA could support the creation and expansion of regional food hub networks, which have the potential to improve market access and stability for food hubs. In a 2017 report, Farm to Institution New England (FINE) found a need for the following initiatives to support the growth and prosperity of food hubs, and particularly to help food producers navigate the barriers to institutional procurement (e.g., in universities, K-12 schools, and health care facilities):

“This report’s recommendations center around the creation of a regional food hub network, including the following initiatives:

1. Develop a business-to-business trade platform for food hubs to buy products from and sell it to other food hubs
2. Establish food service management company local food working groups
3. Hire a collaborative sales force to serve multiple food hubs marketing to the Boston area
4. Form a New England regional food hub support network”

Since this report was published, a New England Food Hub Network and Vermont Food Hub Network have been formed, both collaborating with the Eastern Food Hub Network. USDA may consider funding mechanisms to support existing food hub networks as well as funding to support the development of food hub networks in an effort to improve market access and increase opportunities for institutional procurement of regional food products.

As regional collaborations that span state and local jurisdictions, FSNE and The Partnership are driving collective action and the pursuit of common goals. Our networks efficiently facilitate the exchange of information and best practices while supporting the collaborative creation of food system strategies that seek to address many of the objectives in President Biden’s Executive Order. In particular, networks can be a powerful tool for diverse stakeholders to come together and identify the root causes of inequity in the food system as they manifest across contexts, then collectively craft and implement strategies and approaches for addressing them.

We strongly urge USDA to invest in food system networks, and prioritize those that are working to advance racial equity and address systemic racism in our food system, as a core strategy in its portfolio of approaches to increasing food systems resiliency.

RESPONSE TO SEC. v (J) OF THE FEDERAL REGISTER NOTICE: 
Address Climate Risks by Investing in Local and Regional Supply Chain Infrastructure and Planning

To improve resiliency to the shocks and stresses of climate change to the food system, regional food systems actors must continue to align around common goals, targets and plans. Projections indicate that New England will experience some of the largest agricultural shocks brought about by climate change including increases in freeze risk and more frequent heat waves. Fisheries in New England are also at risk as the ocean is warming faster in the region compared to global temperature increases. The food system is a key factor in climate change responses but is also at great risk.

For the next two years, the New England Feeding New England Project is working to develop strategies for expanding overall food production in climate-adaptive ways. They are doing this by promoting existing research and tested production practices that identify agricultural and food system methods that improve soil health and improve water quality, reduce GHG emissions in the sector, increase the use of renewable energy and efficiency measures, and rebuild fisheries.
The Partnership is collaborating with a core group of researchers with experience and an understanding of these components to develop the production milestones, ensuring that The Partnership is collaborating with a core group of researchers with experience and an understanding of these components to develop the production milestones, ensuring that The 2030 goal of regionally producing 30% of the food consumed in New England is accomplished through aligned climate adaptive methods.

Further, each of the participating six state partners are working to advance climate adaptive strategies in their own states, examples that the USDA may consider replicating or investigating further:

1. Including agriculture and fisheries in climate adaptation and resiliency planning;
2. Developing an inventory of government programs related to climate change and how they relate them to food systems;
3. Supporting farmers and producers to adapt their production methods both through technical assistance and funding;
4. Developing climate-change mitigation activities that include food and agriculture, for example a resilient food system action plan; and
5. Integrating food systems in hazard mitigation, emergency management, and land use planning efforts;

Urban agriculture must also be considered a key strategy for improving the climate resiliency of our food systems. By bringing food production and ownership into the hands of urban communities, USDA can help shorten vulnerable supply chains and shield against system shocks. USDA should invest in both infrastructure and planning, for example by continuing and growing its support for The Urban Agriculture and Innovative Production (UIAP) Competitive Grants and the Community Compost and Food Waste Production (CCFWR) Projects.

As stated by the Intergovernmental Panel on Climate Change, “without the inclusion of comprehensive food systems responses in broader climate change policies, the mitigation and adaptation potentials will not be realized and food security will be jeopardized.” Incorporating and including agriculture, fisheries, and infrastructure demands into climate change policy and planning efforts is essential to building a resilient supply chain and strong food economy.

**RESPONSE TO SECTION ix OF THE FEDERAL REGISTER NOTICE:**
**In All Policies, Prioritize Equity, Local/Regional Supply Chains, and Community Empowerment in Food Systems**

USDA’s actions must be designed to reverse trends toward consolidation in agricultural supply chains, not to perpetuate them. Small scale producers will benefit from more opportunities and
fewer barriers to participate in the regional supply chain and in ways that reach beyond the direct-to-consumer market and give them sustainable and viable opportunities for entering the retail and institutional markets. This ought to include investment in local and regional planning and implementation efforts, support for cross-sectoral collaboration, funding for initiatives that foster connections between food and land access, nutrition and health, and food systems and climate resilience, and most critically, prioritizing systematic solutions that reduce dependence on charitable ones.

Policies aimed at increasing regional food production and strengthen regional food distribution in order to mitigate risk to food access during pandemics, severe weather events, and other natural disasters must be directly linked to significant economic benefits for all regional producers, harvesters, other food businesses, and to the nutritional well-being of consumers. As a starting point, USDA should take into account the following values when crafting policies:

1. **Invest in diversity in ownership** of food systems assets, centering the needs of “socially disadvantaged groups”, particularly Black, Indigenous and People of Color (BIPOC) farmers, ranchers and business owners. For example, supporting policies and initiatives that are developed by community-centered farms, like Soul Fire Farm and providing expanded funding through the Community Food Project grant program.

2. **Support a variety of ownership models** that reflect geographic, age, gender, racial, and ethnic diversity (e.g., cooperatives, publicly-owned infrastructure), and in the sizes of businesses receiving federal support, like the Eastern Woodlands Rematriation project, which has a collective ownership model serving tribal communities.

3. **Prioritize efforts to assist small and mid-scale farmers, food entrepreneurs and fishermen** to implement adaptive measures so that they can produce food for regional consumers and maintain profitability. Historically, rising development pressures and land values limit the ability of farmers, especially beginning farmers and farmers of color, to access land. USDA should reverse or limit adverse policy pressures that threaten regional food system resiliency, such as federally established conventional milk prices that are below the cost of production and limit the viability of small dairy producers to enter the marketplace.

**SUMMARY OF COMMENTS**

This moment in time provides an unprecedented opportunity to accelerate the regionalization of our food system by shortening food supply chains, transforming our regional food system so that it is more racially and economically equitable, and making our food system overall more resilient in the face of climate change. We need to strengthen our regional food system to produce more of what we eat from within the region in order to reduce the risks posed by pandemics, extreme weather events, and similar crises. We believe this can be accomplished by:
1. Addressing systemic issues of inequity and injustice in programs, policies, and throughout the food system;
2. Developing and implementing of production benchmarks to increase regional food production for regional consumption;
3. Conducting regional market demand and infrastructure assessments to inform policy and investments that will support reaching regional production targets;
4. Facilitating a supply chain assessment to address the location of key manufacturing and production assets;
5. Expanded funding for regional and national networks and partnerships between individuals, businesses, NGOs, and government entities, like the Regional Food Systems Partnership (RFSP) grant program and funding for networks of beginning farmers and ranchers;
6. Providing support for the formation of regional food hub networks;
7. Developing a regional climate action plan that includes food and agriculture; and
8. Integrating food systems in hazard mitigation, emergency management, and land use planning efforts.

Thank you for your work on this important effort. Please reach out if you have any questions about our comments and recommendations above.

Sincerely,

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