



# Farm Bill 2012

# **Building Coalitions for Change**

To begin developing a collective vision for farm bill reform, leaders from a diverse field of organizations came together for a workshop convened in April 2010 by the Ludwig Community and Economic Development Clinic¹ at Yale Law School and the National Policy & Legal Analysis Network to Prevent Childhood Obesity, a project of Public Health Law & Policy. This report provides an overview of the discussion, with recommendations for future research and action.



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The National Policy & Legal Analysis Network to Prevent Childhood Obesity (NPLAN) is a project of Public Health Law & Policy (PHLP). NPLAN is a nonprofit organization that provides legal information on matters relating to public health. The legal information provided in this document does not constitute legal advice or legal representation. For legal advice, readers should consult a lawyer in their state.

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# Workshop participants represented many different fields:

Academic/research

Anti-hunger advocacy

Consumer advocacy

Environmental advocacy

Faith-based community

Farmland preservation

Food retail

Food system development

Government

Nutrition advocacy

Public health policy

Sustainable agriculture

## **New Possibilities for Change**

Food policy is big news. Major newspapers, blogs, and magazines are devoting extensive and prominent coverage to everything from the meat industry's attack on climate change legislation to deficits in school nutrition, from a renewed interest in artisan food production to the growing number of farmers' markets. Books by food journalists like Michael Pollan and Eric Schlosser have hit best-seller lists throughout America, and movies like "Food, Inc." and "King Corn" are attracting national audiences. Even news from the White House regularly reports on

Michelle Obama's initiatives to improve school food and support healthy diets. Repeated food contamination scares, the childhood obesity epidemic, and prolonged court battles over food labeling also have catalyzed a new understanding of the harmful and hidden costs of an industrial food system.

By supporting primarily large-scale food production, federal agriculture policy has created an overabundance of unhealthy calories Stakeholders representing a diverse range of interests are beginning to unite around a common desire to change the way food is produced in this country.

and diminished the production of foods that promote good health, with limited concern for the environmental impact of food industry practices. Stakeholders representing a diverse range of interests are beginning to unite around a common desire to change the way food is produced in this country.

The farm bill is the principal piece of legislation that determines agricultural and food policy throughout the United States. The farm bill covers a wide range of topics, including commodity programs, trade, rural development, farm credit, conservation, agricultural research, food and nutrition programs, and marketing. The food production strategies and incentives set by the farm bill have a critical impact on many aspects of food production and consumption, and reforming these policies holds the potential to greatly improve our food systems.

Fortunately, the current political climate may be particularly amenable to farm bill reform efforts. Thanks to growing attention to the link between food and public health, key decision-makers are becoming more responsive to demands for change. Government officials at all levels have a new awareness of the impact of food policy on a variety of issue areas. Additionally, the membership of the Senate Agriculture Committee, and to a lesser extent the House Agriculture Committee, has changed, and the current committees may be more open to taking the legislation in new directions.

To begin a conversation about the possibilities inherent in the next farm bill reauthorization,<sup>2</sup> the Ludwig Community and Economic Development Clinic at Yale Law School and the National Policy & Legal Analysis Network to Prevent Childhood Obesity, a project of Public Health Law & Policy, hosted a workshop in April 2010.<sup>3</sup> The workshop brought together leaders of different organizations, all with an interest in reshaping farm bill policies.<sup>4</sup> The primary goal of this workshop was to begin building coalitions among organizations that historically have not been in regular communication with each other and discuss a multidisciplinary agenda for the next farm bill reauthorization, strategically incorporating goals from the public health, environmental, and sustainable agriculture communities.

#### Why Access Is Not Enough

Even the seemingly simple goal of increasing fruit and vegetable supply is much more complicated than it appears.

Many low-income consumers have difficulty affording fresh produce or live in neighborhoods dominated by convenience stores. In working to address this issue, advocates may inadvertently pit low-income families' needs for affordable produce against farmers' needs to earn a reasonable income. Farmers who grow "commodity" crops (e.g., corn, soy, wheat, cotton, rice) receive government subsidies that lower prices and guarantee income, while farmers who grow "specialty" crops (e.g., fruits and vegetables) face much more risk in increasing production.

The public health community generally focuses on increasing demand and educating about healthy eating, but "supply side" considerations are also important. For example, specialty crop farmers may increase production to meet the needs of underserved communities only to find that there is no concomitant increase in demand, and either the price for their product drops or the products perish unsold. This scenario is a real possibility because our food production and distribution systems are not currently prepared for an increase in the supply of locally<sup>5</sup> produced specialty crops.

In addition, fruit growers in states like Florida and California (who have substantial political power) often oppose government efforts to expand fresh produce production in the rest of the country, fearing an expanded market would lead to a drop in prices. Some are also concerned about unfair competition from growers with subsidized land, while others are concerned with preventing further industrial monocropping.<sup>6</sup> It is difficult, then, simply to increase access to fresh fruits and vegetables without addressing other federal policies that affect production.

As expected, the workshop raised more questions than it answered. But the conversations that took place during the workshop were a first step in developing a vision for a healthy, sustainable food system—a vision that is necessary to achieve reform.

#### **Lessons Learned from 2008**

The workshop began with a panel discussion of lessons learned from the 2008 farm bill reauthorization. First and foremost, panelists urged the participants to "start early," stressing the importance of building relationships across policy areas, such as public health and climate change. The discussion about lessons learned highlighted several issues in particular: funding, competition, and the relative merits of incremental versus systemic change, as well as the limits of definitions used in the legislation and the way the national conversation about the farm bill has been framed.

#### **Funding**

Every panelist mentioned the difficulty in obtaining funding for new or expanded programs in the current economic environment. Congress is currently operating under "pay-as-you-go" rules, which means that any new spending authorization must be

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paid for by increased tax revenue or a cut in funding to another program. All participants predicted a difficult political fight simply to maintain funding for current farm bill programs.

To be successful at securing funding, panelists advised that advocates must strengthen existing political alliances and build new ones. Strategies should focus on funding opportunities outside of crop subsidies. One idea was to advocate for funding to cover the start-up capital costs of developing a particular element of local food systems—for example, a mobile slaughterhouse that would allow more local meat to be processed, or local canning operations that would process fruits and vegetables from the area in bulk. Another recommended strategy was to look for policy change opportunities that do not require new expenditures, such as improving existing program structures and rules.

The prospect that scarce funding could discourage coalition-building efforts was a concern shared by all panelists. One stakeholder's project could be sacrificed to fund another stakeholder's new idea, pitting potential allies against each other. Around the time of the workshop, this situation arose in the debate over funding for the Child Nutrition Act. Lawmakers were strongly considering cutting \$2.2 billion from the Environmental Quality Incentives Program in order to find funding for better school meals. Environmental protection advocates were forced to play defense against nutrition advocates, who could be key allies in the farm bill reauthorization process and elsewhere. Ultimately, in the Senate version of the Child Nutrition Act passed on August 5, 2010, the \$2.2 billion cut from the environmental program was replaced by a \$2.2 billion cut to future benefits in Supplemental Nutrition Assistance Program (SNAP). This trade-off between funding environmental and anti-hunger initiatives illustrates the challenges to coalition-building in the reauthorization process.

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#### Competition

There are a number of different issues involving competition, including the dominance of massive agricultural consolidations and the ability of unsubsidized farmers to compete with those currently receiving government support. Panelists agreed on the need to better define and increase focus on these issues. One specific area mentioned was the possibility of expanding antitrust regulation to address concerns over the consolidation of the farming industry. Traditionally such efforts have not been successful because antitrust law is used to protect the consumer from high prices and scarcity, and the result of our current industrial food system is low prices and great availability. Some panelists pointed to increased federal attention to the possibilities inherent in antitrust law in the hope that it would result in new applications of this field of law. While using antitrust doctrine may not be successful, given the unwillingness of courts to apply the doctrine expansively, the antitrust discussion may help shape components of an overall strategy aimed at regulating corporate giants.

Another facet of the competition discussion was the need to expand eligibility requirements for farmer payment programs so that a greater number of farmers can enroll in particular programs and receive their benefits. It was noted, however, that these efforts will face strong political opposition from existing program participants who fear programmatic changes will reduce benefits and increase competition.

Participants also specifically mentioned the need to take the international context into account. Actions and policies initiated by the United States have global impact. In particular, all current and potential domestic competition policies affect global commodity and credit markets. Change in domestic policies that ignores the international setting may be ineffective, may exacerbate current inequities, and may even create significant new harms to both domestic and foreign food producers. An example of these harms is the food shortages that have occurred recently around the world and especially in developing countries because domestic producers have been driven out by the cheapness of foreign imports.

#### **Incremental or Systemic Change?**

Panelists debated the relative values of pursuing incremental versus systemic approaches to change. Incremental approaches may have advantages in terms of political attainability, and historically, most of the pro-public health gains in the

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farm bill have been achieved in this way. It is relatively easy to implement a specific, narrow change with the focused attention of even just one politician. Much more leverage is needed for broader changes. However, focusing on systemic change and taking a long-term perspective may be more conducive to building collaborations, since it shifts the focus away from infighting over the same small gains and allows for more space to create wins for multiple parties. Systemic change also keeps the focus on big-picture thinking and is transformative.

A long-term perspective provides room to think about policies beyond the farm bill itself, and how these policies might interact with the farm bill. For example, the research title (the 2008 farm bill contained 15 "titles") is a critical tool for developing a vision of food and farm policy for the long term. However, the amount of research funding available in the farm bill is tiny compared with the level of funding the National Institutes of Health (NIH) receives. In addition to focusing on incrementally increasing funding to individual farm bill research programs, advocates could take a broad approach to find a way to increase funding for research on how food is grown by utilizing the connection between food and its effects on chronic disease. This framing would bring the issue into the realm of NIH, which has a much larger research budget. Therefore, a long-term, systemic

approach may provide holistic solutions to problems created by federal agriculture policy.

Panelists stressed how critical it was to think in new, creative ways when crafting policy language. They recommended working to find ideas that cut across traditional definitions or parameters of concern both in defining issues and in proposing programs.

#### **Definitions**

The panelists emphasized the need to expand both the definitions of particular terms in specific pieces of legislation as well as the frame of reference for discussions about the farm bill. Expanding the definition of terms—for example, broadening the definition of which producers can be institutional providers, or who can participate in school lunch programs—was offered as a way to achieve goals such as increased use of fresh, healthy food in government—run institutions or eligibility for federal food assistance programs like SNAP.

Participants pushed for expanding the frame of reference in several ways. One panelist, for example, mentioned that it is important for his organization to change the legislative mind-

set so that farm bill funding could eventually go toward things that have not been a priority, like rural development and farming. This point was reiterated by another panelist, who discussed the need to reframe the conversation about the commodity title of the farm bill such that it was not just about subsidies but also about the underlying overproduction of certain crops.

In all their comments, panelists stressed how critical it was to think in new, creative ways when crafting policy language. Panelists highly recommended working to find ideas that cut across traditional definitions or parameters of concern both in defining issues and in proposing programs.

#### **Common Ground and Common Themes**

There was great debate (leading to some points of strong consensus) around what can be generalized into three main categories, each of which integrates components of a "diversity" perspective. Starting with the local and specific, the first category—"Building Local Systems"—addresses a consistent concern: the need to re-conceptualize production and distribution systems in order to rescale them. The second category, "Coalitions," involves discussion about moving past working just in local advocacy groups—identifying coalitions outside of specific issue—and geography-based groups in order to break down silos, making connections across interests and regions. The third category implicates broad and encompassing questions about "Framing," and involves discussions around how best to talk about and advocate for sustainable food policy.

The theme of diversity emerged repeatedly throughout the day's discussions, ranging from the need to build coalitions with racial diversity to the urgent need to support the diversity of polyculture farming. Embracing and pursuing diversity is critical to the substantive success of a sustainable food policy agenda because it offers a way to synthesize all of the food policy goals into a global vision. Participants also agreed that food policy stakeholders would benefit from embracing diversity for a number of reasons, and that diversity itself is an organizing principle for generating creative coalitions and local food systems.

#### **Building Local Systems**

There was much discussion about how to rebuild production and distribution systems to operate on a new or different scale and be responsive to local markets. Participants agreed that there needs to be increased attention to local food systems and that groups need to concentrate on the "local" as a site of change and productivity. This focus interconnects with a vision of strong local economies, healthy communities, and thriving environmental systems. This focus also represents the desire to capitalize on local agricultural production without imposing consolidated and centralized systems that ignore the unique attributes of diverse production regions. However, there are cases in which developing a consolidated and centralized system is critical, and the challenge is to create this network without the costs to health, the environment, and farming sustainability that current large-scale food production incurs.

Before even beginning this conversation, however, participants asked the important question of what defines "local." City and state laws prescribe some definitions, but there are also clearly more fluid ideas of what constitutes "local" that are based on social communities and cultural affinities. There is also the question of whether it is preferable to have federally mandated definitions that may exclude prospective participants in government programs unnecessarily, or to allow for more informal and variable definitions that communities generate for themselves.

One way of defining the "local" is in opposition to the federal, and participants pointed out that the "local" (e.g., local assistance programs, local food production, pricing of local foods) is currently suppressed to a large degree by federally funded programs that are hard to change (e.g., the commodity program). For example, there are often legal barriers for institutions, like school systems, that

would like to purchase more locally grown food but are instead required to buy food that is provided by the government at cheap prices (because of commodity subsidies). This means that schools in Connecticut are put in the position of buying apples from Washington State and industrially produced meat from large, national producers who operate Concentrated Animal Feeding Operations (CAFOs) in Iowa rather than local, healthy, hormone-free meat and produce. Institutions also face economic barriers; even schools that are not constrained by government procurement rules may be unable to purchase healthier local foods because of cost.

One approach discussed during the workshop was to assume the continued existence of the commodity program and argue that it is flawed because the wrong farms are getting the subsidies. From this perspective, subsidies are

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an inherently neutral system but they are currently being applied improperly. An alternative approach put forward was that the commodity system is inherently unworkable. Taking this approach would mean working toward the elimination of subsidies. Participants disagreed about the extent to which we can or should eliminate the subsidies, but there was consensus around the need to focus on local production and distribution as a counterweight to the consolidated system fostered by current federal food policy.

Making change, participants agreed, will require research. Groups need to take a new look at environmental and food processing regulation to pinpoint where those regulations are failing and how they could be applied effectively in the future. Revised regulation may open the door for reallocating funding patterns. Likewise, studies that investigate the financial viability of local food production will become more and more essential as local food advocates encounter the need to justify and explain the

benefit of the "local" agenda. One major obstacle to promoting local operations is that they are not always profitable. Breaking down the costs, it is clear that these farms are often operationally profitable but the initial start-up costs are high; nonetheless, the profitability argument is used against the case for local and should be countered.

### **Building Coalitions**

Participants agreed on the need to expand food policy coalitions and incorporate the perspectives of multiple stakeholders. A perceptible division between the antihunger and public health advocacy groups was acknowledged, however, along with an underappreciation for the fact that anti-hunger organizations are not opposed to public health. It was mentioned that there has historically been a divide between the interests of these two groups, as low-cost food and nutritious food are often at odds. Anti-hunger groups are principally concerned that low-income, food-insecure people are able to purchase enough to meet their caloric needs, which may mean making a trade-off in terms of nutritional quality. On the other hand, public health advocates are principally concerned with ensuring a nutritional quality of food that will be inaccessible to some low-income constituencies because the costs are too high. Also, there has been a strong link between anti-hunger

groups and large-scale food producers that has put the anti-hunger advocates on the opposite side of the table from the public health advocates.

There was clear agreement that the anti-hunger advocates' goals, such as ensuring adequate SNAP benefits, constitute part of a public health agenda. But despite consensus on the importance of ensuring adequate SNAP benefits, participants mentioned that problems arise in setting priorities—for example, when a list for funding priorities must be made and it is necessary to place one group's agenda ahead of another's. These problems will become even more difficult under conditions of scarce resources, which will certainly be the case during the next farm bill reauthorization, and need to be addressed so as not to be an obstacle to progress.

In a breakout group focused on climate change and agriculture, participants asked whether climate should be viewed through the lens of agriculture or separately, and noted that the answer possibly affected choosing coalition partners. This question highlights the difficulty of weaving together multiple agendas and asking groups to potentially rearrange certain priorities in order to effectively act as a coalition. Once again, the problem is especially acute when funding issues arise and other agricultural programs are funded at the expense of conservation programs.

A breakout group focused on competition and small farm viability brought up two main areas of concern related to coalition building: what the right level of government involvement should be in regulation and oversight of agriculture, and what forms of government support are appropriate (e.g., whether federal programs should take a positive approach and incentivize certain types of farming, or a negative one that penalizes unwanted behavior). The answers to these questions would affect coalition-building strategies by indicating what level of partnership with government agencies would be appropriate, and what government offices or agencies would serve as the best partners. Participants who asked whether there are groups, most likely corporate food companies, that have no place in a sustainable food policy coalition. Some felt that companies like McDonalds will never be a part of the conversation, while others believed that it is necessary to work with any group that wants to join the dialogue. This disagreement reinforced the perceived tension between political expediency (working with anyone who is interested in order to make small changes) and political accountability (refusing to partner with certain groups and companies in order to stay true to a longterm vision of systemic change). Those who believed in political expediency also were more generally supporters of incremental change, and did not think a more flexible and incremental approach was at odds with more wholesale change—that is, partnering with a mega-corporation would not undercut the message and value of any change the partnership produced.

#### **Framing**

Framing is critical, participants agreed, especially given that industrial, corporate food producers are already spending substantial amounts to frame and market their agenda. The framing must be sophisticated and compelling to a wide audience that includes not only food advocates but also community advocates, political groups, and most especially, consumers.

A first suggestion was to focus on economic development and job creation. The economic frame was seen as having particular resonance with the general public as well as with policymakers. Participants reiterated the need to focus on the economic benefit from and efficiency of local systems.

The second was promoting the concept of healthy communities. There is increasing consensus—in the current community of food advocates and beyond—about the need to achieve healthy communities with sustainable economies, distribution systems, and biodiversity. This broad use of the concept of sustainability was seen as a way to connect public health with a number of issues not normally thought of as public health concerns—e.g., the need for local food processing centers or the development of ecologically sound farming practices.

Third, there was interest in trying to introduce civil rights and food justice as a potential framing device, most especially as it brings the anti-hunger advocates into the fold and represents their goals. Several individuals remarked that many successful movements (civil rights, anti-discrimination, living wage, etc.) have social justice as the common conceptual denominator. Participants also noted that access to healthy food as a human right is currently a prevailing international advocacy frame.

A fourth key frame was environmental sustainability, including sustainable agricultural production. It was suggested that this frame could be very useful because it encompasses the idea of healthy/sustainable communities as well as justice angles.

Participants were also, however, concerned about the pitfalls of trying to bring so many different groups into one frame and holding everyone in a coalition (as well as those outside of it) to the consistent use of this frame. Participants agreed that it was clearly necessary for individual groups to be able to modify messaging to better suit their organizational needs but that there also should be an overarching frame with a consistent set of messages. One question raised in conjunction with this question of uniformity was how much energy should be spent on the visioning process now. Certain participants felt that there was an undue emphasis put on the need to create a cohesive vision before developing new initiatives. These participants felt that, while a comprehensive visioning process was essential as a road map for all future reform efforts, it would not necessarily lead to concrete changes for the 2012 farm bill.

Other common questions addressed the substance of the frame and asked both what a vision of a parallel food system would look like and how it would compare with the commodity-based system (i.e., the reintegration of crops and livestock; reintroducing variety). Participants mentioned that implementing a new vision will require undoing a system that has been entrenched for more than 60 years, and it is important to be explicit about next steps and how they might temporarily produce "painful" or undesirable side effects (for instance, how removing subsidies would affect farmers currently receiving them).

Finally, questions resurfaced regarding long-term versus short-term goals and top-down versus bottom-up approaches. A concern of particular importance to the anti-hunger advocates was addressing the relative importance of short- versus long-term issues, as stemming hunger is a short-term goal while changing food systems is a long-term one. Likewise, participants discussed whether the food policy agenda should be approached as change coming from the bottom up (driven more by local and grassroots agents of change) or from the top down (driven by federal legislation). Participants were not sure these approaches were mutually exclusive, but noted that they might require different frames.

#### Conclusion

The workshop initiated an important conversation that must and will continue. Local and regional food systems emerged as a policy area that provides ample opportunity for collaboration and coalition building. Creating and maintaining

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diverse coalitions was recognized as vital for implementing the political changes needed for long-term systemic reform. Lastly, participants agreed that a critical component of the work ahead for these coalitions is to situate the issues in frameworks that are sophisticated and appealing to consumers, politicians, and advocacy groups.

As the conversation expands, other voices and interests need to be included, and there needs to be an effort to address more directly how domestic policies intersect with global concerns. Continuing this discussion will hopefully lead us to a robust vision of what food policy can and should look like—one that all members of a broad coalition can support—as well as a fleshed-out framework for implementation.

<sup>&</sup>lt;sup>1</sup> Clinic students Allison Tait and Lang Liu produced the initial draft of this document. They were joined by fellow students Jeremy Golubcow-Teglasi, Casey Hinkle, Dominick Grant and Shannon Marimon in planning and running the workshop.

<sup>&</sup>lt;sup>2</sup> The farm bill is an omnibus bill that is passed every five or so years by Congress. Given how comprehensive and far-reaching its provisions are, the legislative process for passing the farm bill begins far in advance of its final passage date. For example, the House of Representatives agriculture committee held the first 2012 farm bill hearing on June 30, 2010.

<sup>&</sup>lt;sup>3</sup> The workshop was held the day before the "Developing Food Policy" conference, also hosted by the Ludgwig Community and Economic Development Clinic at Yale Law School and the Yale Human Rights and Development Law Journal.

<sup>&</sup>lt;sup>4</sup> The appendix lists the workshop attendees and the organizations that they represent.

<sup>&</sup>lt;sup>5</sup> The question of defining and contrasting local versus regional is beyond the scope of this particular paper, and we use local throughout to denote both concepts.

<sup>&</sup>lt;sup>6</sup> For an example of the specialty crop growers' perspective, see the Specialty Crop Farm Bill Alliance's political platform, with its goal of enhancing "the competitiveness of specialty crop producers and benefit American consumers" by opposing "Direct Payments to Specialty Crop Producers," among other things. Available at: www.competitiveagriculture.org/farmbillprinciples.html.

<sup>&</sup>lt;sup>7</sup> While not a part of the workshop discussion, the scholarship of law professors like Peter Carstensen explains the problems as well as the possibilities for using antitrust in the agricultural context. Carstensen suggests that "if antitrust takes buyer power seriously, great improvement in the competitiveness, efficiency, and fairness of [agricultural] markets is possible." Buyer power, for Carstensen, means not only cheap prices but the availability of a wide range of agricultural goods and services. *See* Carstensen P. "The prospects and limits of antitrust and competitive-market strategies." In *Food and the Mid-Level Farm: Renewing an Agriculture of the Middle*, Lyson TA, Stevenson GW, and Welsh R. (eds.) 2010, p. 247.

## **Appendix: Workshop Attendees**

Name Organization

Marice Ashe Public Health Law & Policy / National Policy & Legal

Analysis Network to Prevent Childhood Obesity

Ed Cooney Congressional Hunger Center

Peter Crane Yale School of Forestry & Environmental Studies
Bill Duesing Northeast Organic Farming Association of CT

Andy Fisher Community Food Security Coalition

John Fisk Wallace Center

**Rob Friedman** Rudd Center for Food Policy & Obesity

Christine Fry National Policy & Legal Analysis Network to

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Robin Golden Yale Law School

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Dana GundersNatural Resources Defense CouncilJim HarknessInstitute for Agriculture & Trade Policy

Mary Hendrickson University of Missouri Extension

Oran Hesterman Fair Food Network

Ferd Hoefner
National Sustainable Agriculture Coalition
Fred Kirschenmann
Aldo Leopold Center for Sustainability
Carol Kramer-LeBlanc
United States Department of Agriculture

Britt LundgrenEnvironmental Defense FundMatthew MarsomCalifornia Health Policy ForumMargaret MellonUnion of Concerned Scientists

**Leslie Mikkelsen** Prevention Institute

Mary MinetteEvangelical Lutheran Church in AmericaRoni NeffJohns Hopkins Center for a Livable Future

**Lucy Nolan** End Hunger-CT

**Dennis Nuxoll** American Farmland Trust

Kathy Ozer National Family Farm Coalition

Brian Ronholm Office of U.S. Representative Rosa L. DeLauro

Robin Salsburg Public Health Law & Policy

Seth Shames EcoAgriculture

Melina Shannon-DiPietro Yale Sustainable Food Project

Kenneth Smith National Association of City & County Health Officers

James Subudhi WeAct for Environmental Justice

Josh Viertel SlowFood USA

Ellen Vollinger Food Research & Action Center

**David Wallinga** Institute for Agriculture & Trade Policy

John Weidman Food Trust
Erin Wirpsa Eisenberg CitySeed

**Heather Wooten** Public Health Law & Policy