August 26, 2010

Reconsidering Federalism and the Farm: Toward Including Local, State, and Regional Voices in America’s Food System

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Essay

Reconsidering Federalism and the Farm: Toward Including Local, State and Regional Voices in America’s Food System

Margaret Sova McCabe*

“. . . the supervision of agriculture and other concerns of a similar nature, all those things in short which are proper to be provided for by local legislation, can never be desirable cares of a general jurisdiction.”
- The Federalist No. 17

Why is the relationship between our food system and federalism important to American law and health? It is important simply because federal law controls the American food system. This essay considers how federal law came to structure our food system, and suggests that though food is an essential part of our national economy, the dominating role of the federal government alienates citizens from their food system. It does so by characterizing food as a primarily economic issue, rather than one that has ethical, health, and cultural components. However, state and local government have much to offer in terms of broadening the scope of food system considerations. This essay first provides a simplified overview of American food system influences. It also touches on the major legal principals affecting the system. Finally, it highlights three examples of how to include local, state, regional voices in food system reforms. The examples are: the food system indicator tool, farm to school programs, and food policy councils These solutions illustrate that the best food system reforms require exercise of federal, state, and

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2 If nothing else, the American food system is complicated. Excellent resources for developing a deeper understanding of the American food system are available at http://www.nationalaglawcenter.org/.
local powers in ways that maximize the individual’s ability to influence and participate in the food system.

In our modern history, the federal government’s exercise of the commerce clause is the primary influence on the American food system. While historically the United States has seen great shifts between a powerful federal government and states’ rights, state and local government play a lesser role in the food system, despite having police powers important to it. The state and local role is shaped largely by efforts to participate in, or comply with federal programs, on behalf of its citizens, such as Supplemental Nutrition Assistance Program (SNAP) or the National School Lunch Program.

There can be no question that the federal government controls the American food system. Nor is there any question that significant federal control is appropriate. In fact, this dominant federal control made sense in our history, as this essay later explains. However, unless reforms to the food system include local, state, and regional contributions and control, chances at curbing food-related diseases, improving poor nutrition, and reconnecting with the natural environment diminish. This essay argues that New Deal federalism and its progeny created distance between Americans and their food,

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3 Julie Samia Mair, et al., *The Use of Zoning to Restrict Fast Food Outlets: A Potential Strategy to Combat Obesity*, The Center for Law and The Public’s Health at Johns Hopkins and Georgetown Universities (Oct. 2005); see also A. Bryan Endres and Jody M. Endres, *Homeland Security Planning: What Victory Gardens and Fidel Castro Can Teach Us in Preparing for Food Crises in the United States*, 64 Food & Drug L.J. 405, 407 (2009) (“The federal government has not considered the role of regional and local food networks in its national homeland security planning. Instead, federal homeland security, as it relates to agriculture and food, assumes the status quo of conventional agriculture one that heavily relies on petro-chemical inputs that continue to skyrocket in price and negatively impact the environment, concentrated production and processing markets, and transportation to service distant customers.”)

contributing to the sense that Americans do not shape the food system, we allow it to shape us.\(^5\)

Much American food system criticism is leveled at federal programs. The primary complaint is that citizens are at the mercy of big agribusiness, which is backed by big government policy. The most well known example of this big government policy is the Farm Bill, which provides for crop subsidies and other federal crop production policies. There are other significant federal influences such as anti-trust regulation\(^6\) and marketing orders\(^7\), but these are not as debated in popular culture. However, all three have significant influence on the size of agribusiness and what it produces. Whether the big agribusiness criticism is well founded is not the current issue, because the perception that it the problem is a rallying cry for food system reformers.

Today, reformers working on projects as diverse as the farm-to-school programs and fast food zoning bans share a common goal: giving individual citizens a voice in the food system. However, the historical roots of food and federal government programs muted the individual’s voice, and even the state’s influence, because it rested on the

\(^5\) See Ernest Young, *State Sovereign Immunity and the Future of Federalism*, 1999 Sup. Ct. Rev. 1, 3 (noting Madison, in *The Federalist* 45 and 46, recognized that “the states’ ultimate security lies in the confidence of the people. That confidence expresses itself through the political process . . . but ultimately turns upon the continuing relevance of state government institutions to the day-to-day lives of the citizenry. The greatest danger to federalism, therefore, is that the expanding regulatory concerns of the national government will leave the states with nothing to do.”)


Food law and health issues have become so big – with economic, public health, and cultural components – that it is easy to find the situation is hopeless. These issues include: food related diseases, lacking food security, food deserts, animal welfare, immigration policy, and agricultural production methods. Specific examples include: a Farm Bill that promotes production of industrialized crops for shelf stable foods that contribute to food-related disease rates (such as obesity, heart disease, and diabetes) rather than a wide variety of fruits, vegetables, and grains; a conflicted National School Lunch program that has a dual policy of commodity crop consumption and child nutrition; and food security programs that do not cover the cost of a healthy diet. These issues touch every American in some way and these issues are symptoms that the food system lacks political balance and long term sustainability.

Today, a person has little legal power to shape the food system, other than voting wisely for government representatives or with her pocketbook at grocery stores, restaurants, and markets. Analyzing our food system’s roots in federalism will help us shape solutions in a way that will not only allow greater contributions from local and state government, but also a better system of checks and balances on federal food policy. Leveraging various government powers in new ways in the food system will also give the individual more power in food policy choices.

Simply put, federal agricultural policy has a direct effect on public health. However, federal food system policy views food primarily as an economic proposition –

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and this makes sense given that Congressional food policy is empowered primarily by the commerce clause. Additionally, the federal power over the food system has its roots in stabilizing market prices and rural economies, not considering health and environment. However, as concerns over food-related disease and nutrition mount it should be obvious that we must no longer view food as a purely economic proposition.9

On the positive side, there are many talented people from diverse disciplines proposing powerful solutions and approaches to food system issues. Law is the mechanism that can give life to these solutions and approaches.

**Federalism on the Farm in the New Deal: A Brief Overview**

In 1933, Americans were shocked that the government intentionally slaughtered pigs and plowed up cotton crops in the name of economic stability.10 The plan, executed by the Agricultural Adjustment Administration (AAA), was one in a series of steps intended to raise food prices.11 While this may seem strange given the immediate hunger of Americans suffering during the Great Depression, the greater need was economic recovery – and that started on the farm.12 Henry Wallace, the first head of the AAA, described agriculture as a business stating, “Agriculture cannot survive in a Capitalist

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11 Others include establishing the Commodity Credit Corporation and Farm Services Administration. *See* Davis, *supra* note 11 , at 272.

12 Id.
society as a philanthropic exercise.”13 Wallace, and the Roosevelt administration, knew that the agricultural markets were broken and needed structure to function properly.

However, the New Deal’s economic approach to the food system’s structure could be viewed as taxpayer’s philanthropy in support of farmers and promotion of agricultural production that was not reflective of our nation’s nutritional, environmental, or economic realities. The most fundamental aspect of New Deal agricultural policy was that it was about the economy – not nutritional policy (though this was seen as a possible beneficial side effect). That legacy remains today, as government policy views food foremost as an economic proposition. Reviewing the New Deal agricultural policy illuminates, in part, how federal controls of our modern food system began.

The original scheme, embodied in the AAA14 was ruled unconstitutional in 1936.15 However, subsequent amendments embodied in the Agricultural Marketing Adjustment Act of 1937 (AMAA) retained its core principles, which 72 years later have changed little. One of these principles was stabilizing agricultural market pricing.16 At the time, surpluses drove prices down, resulting in farmers faltering. The President believed that recovery from the Depression started on the farm and that the government had to take “emergency steps” to control the markets.17

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17 Though later historians have argued that the AAA was viewed as not only an emergency measure, but rather the long-term solution to agricultural market control. JIM POWELL, FDR’S FOLLY: HOW ROOSEVELT AND HIS NEW DEAL PROLONGED THE DEPRESSION 215 (2003). Readers should also consider the usefulness of the AMAA during USDA Secretary Earl Butz’s administration, when the federal goal was to reduce food costs.
Accordingly, Congress declared the AAA’s purpose avoidance of “the disruption of the orderly exchange of commodities in interstate commerce.”18 Congress’s further purpose was to avoid market disruption that could harm “the purchasing power of farmers’ thus destroying the value of agricultural assets to the detriment of the national public interest.”19 These purposes remain codified today. Ironically – though this sentiment was rejected thoroughly by Wickard v. Filburn – in 1936, the Supreme Court noted that the original act “invaded the reserved rights of the states. It is a statutory plan to regulate and control agriculture, a matter beyond the powers delegated to the federal government.”20 Later, in Filburn, the Court found that a Farmer Filburn could no longer save wheat for his family, or own use, as such use of his crop could disrupt the national economy. Perhaps this moment was the true start of American acceptance of globalization.

Today, the AMAA shapes American food availability by regulating the quality and quantity of twenty-five commodity crops.21 The original purpose of the act remains the same today as in 1933 – to protect farmers and consumers from price fluctuations by creating stable markets. However, the type of crops and their relationship to public health appears of little federal concern (perhaps due to Constitutional limitations on Congressional authority to regulate for the public health).

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18 Rock Royal 307 U.S. at 544-545.
19 Id.
20 Butler, 297 U.S. at 68.
21 7 U.S.C.§ 608(2)(c); see Glickman v. Wileman Bros. & Elliott, Inc., 521 U.S. 457, 494 (1997)(Souter, J. dissenting) (“First, the Act authorizes paid advertising programs in marketing orders for 25 listed fruit, nuts, vegetables, and eggs, but not for other any other agricultural commodity. The list includes onion but not garlic, tomatoes but not cucumbers, Tokay grapes but not other grapes and so on. The selection is puzzling.”)(internal citations omitted).
Ultimately, the Supreme Court invalidated much of the New Deal legislation on improper delegation grounds. However, the Court finally accepted that the government’s efforts to regulate food markets was constitutionally acceptable under the commerce clause, and desirable for the public good, so long as it did not reach into matters of local commerce. Indeed, by 1997 the Supreme Court had wholly accepted that the AMAA constitutionally and properly replaces free market competition in certain commodity crops with collective production controlled through federal marketing orders.

Congress’s exercise of its commerce clause power under the AMAA to stabilize markets is problematic because it reduces much of domestic food production to a closed system between the federal government and producers, leaving individual consumers with the limited role of choosing to buy what is grown (or not). Add to the marketing orders system the influence of the Farm Bill’s commodity crop provisions (such as subsidies) and there is little room for public health or individual preference in the American food system.

*Food and Money: Post World War II and the Second Bill of Rights*

President Roosevelt articulated the connection between the economy, food, and food security in 1944. He declared the “Second Bill of Rights” which fundamentally

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23 *Rock Royal*, 307 U.S. at 570 (“The people of the great cities depend largely on an adequate supply of pure fresh milk. So essential it is for health that the consumer has been willing to forego unrestricted competition from low cost territory to be assured of the producer’s compliance with sanitary requirements, as enforced by municipal health authorities.”)
24 *Glickman*, 521 U.S. at 461 (holding USDA regulations requiring California fruit producers to contribute to generic advertising for California fruit commodity crops did not violate the First Amendment rights of producers).
recognized that having a job was most important to an individual’s right to food.

Specifically, Roosevelt’s January 11, 1944, State of the Union Address, declared: 25

[W]e have come to a clear realization of the fact that true individual freedom cannot exist without economic security and independence. “Necessitous men are not free men.” People who are hungry and out of a job are the stuff of which dictatorships are made.

In our day these economic truths have become accepted as self-evident. We have accepted, so to speak, a second Bill of Rights under which a new basis of security and prosperity can be established for all—regardless of station, race, or creed.

Among these are:…

The right to earn enough to provide adequate food and clothing and recreation;

The right of every farmer to raise and sell his products at a return which will give him and his family a decent living;

The right to adequate medical care and the opportunity to achieve and enjoy good health;

The right to a good education.

All of these rights spell security. And after this war is won we must be prepared to move forward, in the implementation of these rights, to new goals of human happiness and well-being. 26

The right to food in the Second Bill of Rights is an economic one. This is a crucial point – Roosevelt did not call for a right to food – he called for a right to earn wages that would in turn allow purchase of food. Roosevelt’s policies sought to realize the right to wages through economic growth, which further reinforced the need for crop price supports. Without supports, farmers risked plunging prices in times of surplus, resulting

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26 Id.
in economic slowdown. Therefore, the federal control exerted over commodity crops became a hallmark of American agricultural policy.

Here, we should pause to consider the effect of the New Deal on Farmer Filburn. Before the New Deal, Filburn was able to feed himself and his family from his farm. After, he was not, without risking federal penalty. This was a monumental shift. The court justified the penalty on Filburn for growing excess wheat in this way:

> It can hardly be denied that a factor of such volume and variability as home-consumed wheat would have a substantial impact on price and market conditions. This may arise because being in marketable condition such wheat overhangs the market and if induced by rising prices tends to flow into the market and check price increases. But if we assume that it is never marketed, it supplies a need of the man who grew it which would otherwise be reflected by purchases in the open market. Home-grown wheat in this sense competes with wheat in commerce . . . Congress . . . properly . . . considered that wheat consumed on the farm where grown if wholly outside the scheme of regulation would have a substantial effect in defeating and obstructing its purpose to stimulate trade therein at increased prices.27

Thus, in 1942 the commerce clause began to reframe the way farmers thought of production – it was now for interstate and international markets, and not necessarily the local community and family. This policy now symbolizes a major way that our food system does not represent our health and nutrition needs, but rather an outdated economic need. Coupled with this outdated view of food systems, is an outdated view of how local and state governments can contribute to its strength.

*Food, Money, and Power: Rise of the Administrative State*

The New Deal also held a new vision of the administrative state.28 Its design vested power in federal administrators to “exercise control over the varying phases of our

27 *Wickard*, 317 U.S. at 129.
economic life.” The concept of insulating decision makers from “factional power” by relying on those administrators’ technical expertise was enticing to reformers seeking to avoid powerful political pressures. However, the approach is problematic in two respects. First, in practice our federal agencies are not insulated from factional power. In fact, many have argued the food industry’s influence over the USDA and FDA is a prime example of ineffective federal regulation. Second, the New Deal reformers “believed that the presidency and regulatory agencies provided better opportunities than state and local government for democratic self-determination.”

This lack of trust in state and local government is important to food law today in essential ways. First, it overlooks that states hold the police power to regulate for public health. Even more fundamentally, it overlooks that democratic self-determination is an individual right, not a federal responsibility. These factors combined necessitate reconsideration of how local and state government can effectively contribute to a better food system, and special consideration of how the individual fits in the rubric.

Even though individuals hold international human rights to food, American courts do not find these rights enforceable against the federal government unless some other constitutional issue, such as equal protection or due process is at issue. As health

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29 Id. at 443 (citing Landis).
30 Id. at 457.
31 E.g., Michele Simon, Appetite for Profit 146 – 165 (2006); Kelly Brownell, Food Fight 243 (2004); Marion Nestle, Food Politics 95-111 (2003).
32 Sunstein, supra note 28, at 501.
33 See Boehm v. Superior Court, 178 Cal. App. 3d. 494, 502 (Cal. App. 5 Dist. 1986) (“We conclude that the [general assistance] grant fixed by the County must include an appropriate allowance for each of the basic necessities of life: food, clothing, housing (including utilities), transportation and medical care.”); Emily Wood, Economic, Social, and Cultural Rights and the Right to Education in American Jurisprudence, 19 Hastings Women’s L.J. 303, 311 (2008).
problems related to our food system become more serious for individuals, economic and public health goals must become consistent to improve the human condition at an individual level. Achieving consistency between economic and public health policy is not as easy as simply passing a National Food System law, or national school lunch program because, as alluded to above, the fundamental legal authority necessary to address economic and public health aspects of the food system differ. Rather, a consistent policy harmonized to maximize economic and public health in the food system should leverage the unique legal powers of the federal, state, and local governments.

Such leveraging will provide greater opportunity for citizen involvement in the food system. Recall that while Americans may have a moral right to food, they have no individual legal right. In the absence of a legal right to food citizens are not in control of the food system – the Constitution vests that control in government. Two examples illustrate this principle.

A poor child in south central Los Angeles will likely receive breakfast and lunch from her school through the National School Lunch Program (NSLP). To receive those meals, the child depends on local and state administrators’ compliance with the federal NSLP regulations. Established in 1946, the NSLP’s dual purpose is to “safeguard the health and well-being of the Nation’s children and to encourage the domestic consumption of nutritious agricultural commodities and other foods.” The NSLP is now viewed by some as turning children into a dumping ground for our agricultural surpluses,

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which are highly processed and distributed nationwide.\textsuperscript{36} Today, children who are served by traditional NSLP cafeterias must rely on the “technical expertise” of the federal government to determine what their food system looks like. The child and her parents play little role, but shouldn’t they?

Remaining in south central Los Angeles, let us suppose the same child’s dinner comes from Burger King because it is cheap, calorie dense, and convenient. If the child’s favorite Burger King closes, it will not be replaced with another fast food outlet because the city has a moratorium on such establishments. Widely publicized as the first example of using zoning as a public health tool, the moratorium is the exercise of the police power in response to higher than national obesity rates in the area it covers. Critics complain that it is a paternalistic and likely an ineffective way to address obesity rates. Proponents see it as “one way local communities can use zoning laws to create a retail market that offers healthier foods.”\textsuperscript{37} If nothing else, the moratorium is provocative. But the question remains: does exercising the local police power to prohibit fast food restaurants really change the local food system?

Another timely example comes from California’s Santa Clara County. There, in 2010, the county adopted an ordinance that prohibits restaurants from giving toys in meals sold, if that meal does not meet certain nutritional standards.\textsuperscript{38} The county ordinance specified the nutritional standards with limits for calorie, sodium, fat, and sugar content in the meals. The county justified this ordinance with data from an obesity report, showing that one in four of the county’s 7\textsuperscript{th}, 9\textsuperscript{th}, and 11\textsuperscript{th} graders was overweight

\textsuperscript{36}E.g., Dillard, \textit{supra} note 34, at 3.
\textsuperscript{37}Mair, \textit{supra} note 3, at 4.
\textsuperscript{38}SANTA CLARA COUNTY, CA, ORDINANCE NO. NS300.820 (April 27, 2010).
or obese, and one in three toddlers was also overweight or obese. The Los Angeles and Santa Clara County regulations illustrate that local government possesses powerful tools to curb eating habits that data suggest are related to fast food.

We could view the Los Angeles moratorium or the Santa Clara regulation as local government agitating against the results of federal agricultural policy (a policy that has provides abundant, cheap, processed food). If we accept the proponents’ view that it is warranted exercise of the police power, then closely dissecting this statement reveals an essential truth: when it comes to food, public health and the economy are inextricably linked. Thus, food system regulation requires a complex, delicately balanced exercise of government powers – as well as exercise of that power in ways that empower the individual’s role in the food system.

The Future of Food is Now

An essential element of a more effective food system is individual empowerment to shape it. In two of his compelling works, The Future of Food and Appetite for Change, food system scholar Warren Belasco chronicles how food reflects social policy and norms – or developing norms in the case of the 1960s “counter culture.” Whether it was Malthusian population theory or Chef Alice Waters’ introduction of slow food to American culture, food “movements” have powerful influence on food systems. These grass roots movements are important – but so, too, are formal efforts to engage local, state, and regional voices in food system reform. These formal efforts, in large part, bring grass roots efforts to government. They share common components: recognition of

39 E.g. Illinois Food, Farms, and Jobs Act, Public Act 095-0145 (2007) (creating a Local and Organic Food Task Force to establish a plan for policy and funding recommendations to expand and support the State food system).
federal influence, a connection to local and regional concerns, and integration of social justice goals.

At the base of food system reform are fundamental questions: how is it ineffective and what do solutions offer? In order to answer these questions, government relies on open debate and data analysis. However, Washington is overrun with special interest lobbyists that influence the process far too much. The University of New Hampshire is developing a solution.

The Food System Indicator Tool allows charting of current food system practices that are not sustainable.\footnote{The Food System Indicator Tool is not yet available publically. However, it is modeled on the Carbon Solutions New England “Decarbonizer” which is available at: \url{http://www.carbonsolutionsne.org/projects/decarbonizer/}.} Examples of “business as usual” trends include farmland loss, food insecurity, and food-related disease rates. The tool then allows users to chart policy solutions against the trend, visually showing how the proposed solution might change the trend. The tool’s solution wedges are based on data gathered from public sources such as the USDA’s National Agricultural Statistics System (NASS) and U.S. census data. The tool allows objective and transparent policy analysis based on specific data sets, which has powerful potential to neutralize lobbying influences.

Importantly, it allows users to examine regional and state impacts of wedge solutions. This allows refined understanding of the interaction between local, state, and regional policies. As a result, all levels of government can examine and plan what solutions are most appropriate and effective for the region based on objective, transparent data. An added bonus is that by viewing how a policy can positively influence a region, states will be encouraged to leverage resources regionally, reducing the possibility that...
the New Deal-era federalism concerns about state anti-competitive behavior will recur. The Food System Indicator Tool is in its infancy. Yet, its innovative approach has great potential to contribute to food system reforms by allowing objective analysis of local, state, and regional policy solutions.

Return to south central Los Angeles for a moment. The child eating in the NSLP there has a vastly different experience than a child attending the Berkeley, California schools. That is because Berkeley is a farm-to-school district. Farm to school programs are, “based on the premise that students will choose to eat more healthy foods, such as fruits and vegetables, if the foods are fresh, locally grown, picked at the peak of their flavor, and supplemented by educational activities that link them with the food cycle from seed to table.”\textsuperscript{41} What is important about these programs is that each one is unique, allowing communities to tailor school lunch programs to local agriculture, educational system, and community preferences.\textsuperscript{42}

Though not officially supported by the federal government, most farm-to-school programs are funded through the NSLP, just as traditional “hot lunch” programs are funded. Farm-to-school emphasizes good agricultural stewardship, as well as economic innovation by bringing students into the food system not just as consumers, but also as producers and planners. If students are engaged in the food system and understand that

\textsuperscript{41} Farm to School Report, Conclusions and Recommendations p 3; see also USDA, \textit{Legislative History Related to Farm to School}, (noting developments such as the Fresh Fruit and Vegetable Program in 2002 and 2010 pilot program for community garden pilot program) available at: \url{http://www.fns.usda.gov/cnd/F2S/about.htm#Involvement}.

\textsuperscript{42} Though Farm to School programs are not workable year round in all climates or environments there are other ways that local initiatives can improve school lunch programs, which the federal government is recognizing. \textit{See} Healthy, Hunger-Free Kids Act of 2010, S. 3307, 111th Cong. §204 (local school wellness policy implementation);§ 243 (access to local foods and school gardens) (2nd Sess. 2010).
they have the ability to change it, then they are more likely to advocate for their basic human right to quality food. They are also more likely to make the economics of a modern food system workable. However, the pressing task today is reformation of NSLP to provide greater funding and flexibility for districts to adopt or innovate on the farm to school approach. Reform like this will likely require rethinking the relationship between NSLP and commodity crops – a major step for the NSLP, but one that is necessary to empowering children to learn that all citizens have responsibility for the food system.

The food system indicator tool and farm to school programs will have the most impact if they are part of a larger plan adopted by a state Food Policy Council. Professor Neil Hamilton of Drake University Law School captured the power of food policy councils in his 2002 article, *Putting a Face on Our Food: How State and Local Food Policies can Promote the New Agriculture.* Hamilton fully recognizes that state government should play an important role in supporting agriculture through direct marketing, support of institutional buying such as farm to school, and eco-labeling. Hamilton also identifies that the food systems approach embraced by food policy councils is not in use because the federal system, and its powerful political factions, currently dominate the dialogue.

Powerfully, food policy councils present opportunities for everyday citizens to be involved in the food system. They present opportunities for different voices in the system to meet, cooperate, and create sustainable, profitable relationships. Further, state councils have the potential to form regional relationships, using innovations like the food system indicator tool to monitor and improve food systems. Additionally, state and

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regional food councils together represent power – but from the bottom up. This power can influence change in federal policy while gathering national support for what works at the state and local level. Using information from state food policy councils the federal government could select projects to fund, or adopt more effective rules in response to food policy council input. Finally, food policy councils could be a reliable source of information for lawmakers about what is truly happening in the food system at the community level, rather than relying on federal government reports and lobbyists.

Food law and health is one of the most important topics facing America today. Food system health relates directly to public and economic health. To the extent that the federal government has played a large role in creating what many believe is an unhealthy, unsustainable food system the federal influence on the food system should be reduced. I do not suggest that the federal government plays no role, only that food system reform will require mechanisms that maximize all government powers, while recognizing their distinct differences. If we ignore the federalism dynamic when considering food system reforms, we will continue to deny citizens a food system that is healthy, sustainable, and profitable.

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