



## **CFS Voluntary Guidelines on Food Systems and Nutrition Zero Draft consultation – North America**

National Family Farm Coalition comments  
Delivered by Patti Naylor<sup>1</sup>  
College Park, Maryland  
Nov. 14-15, 2019

My name is Patti Naylor. I am a farmer in Iowa, working alongside my husband who has grown corn and soybeans for over 40 years, making the decision to never plant genetically engineered seeds. Five years ago, we transitioned to organic production and added small grains, hay, pasture, orchard, and prairie to our farm.

I am here today representing National Family Farm Coalition, as a member of the Civil Society Mechanism - North America, the US Food Sovereignty Alliance, and La Via Campesina North America. And, I am here as a witness to the farm crisis unfolding in the United States. Many farms that have dairy cows are in an immediate and heartbreaking crisis, but all categories of US farms are financially vulnerable.

I commend the CFS for holding these regional consultations with the high expectation of farmer and producer participation in this important policy-making space. However, I must express our concern that the USDA has seemed to obfuscate this process in North America, failing to follow the standard procedure for participation. Considering its mission, the USDA should be supporting the participation of independent family farmers, under-represented stakeholders, and civil society organizations in UN processes, not deter participation through the willful lack of transparency or by prioritizing corporate perspectives.

I would like to draw attention to the relevance of this discussion of the Voluntary Guidelines to the US context and the underlying problems that our food systems are facing today. Effective guidelines on food systems and nutrition must take into account a holistic perspective of the health of rural communities, the viability of family-scale farms, and the protection of Earth's precious ecosystems. Access to nutritious foods is inextricably linked to the socio-economic and ecological health of where food is produced. Therefore, these comments begin by acknowledging a few of the core challenges facing family farmers and rural communities in the US.

For decades, the U.S. government has followed a deregulatory approach to how food and agricultural systems are governed. From eliminating parity price support programs for farmers, to privatizing the agricultural social safety net through inadequate insurance schemes, to suppressing research on climate change<sup>2</sup>, this approach has had profoundly negative impacts on rural America. Unprecedented levels of farmer debt<sup>3</sup>, highly

---

<sup>1</sup> These remarks have undergone minor editing and referencing from their original oral presentation

<sup>2</sup> Democratic Policy and Communications Committee:

<https://www.stabenow.senate.gov/imo/media/doc/DPCC%20Attacks%20on%20Science%20Report.pdf>

<sup>3</sup> Federal Reserve: [https://www.federalreserve.gov/monetarypolicy/files/BeigeBook\\_20191016.pdf](https://www.federalreserve.gov/monetarypolicy/files/BeigeBook_20191016.pdf)

*NFFC's mission is to mobilize family farmers, ranchers, and fishermen to achieve fair prices, vibrant communities, and healthy foods free of corporate domination.*



concentrated markets stifling competition and innovation<sup>4</sup>, increasing vertical integration of supply chains (including livestock which are now mostly in confinements and feedlots – we need livestock on our farms and we need people on the land to care for those animals), inequitable distribution of financial and instructional assistance, and significant barriers to entry for new and beginning farmers<sup>5</sup> are all symptoms of U.S. government policy failing rural America. I would like to see in the guidelines an emphasis on policy to keep farmers and peasants on the land, producing food instead of migrating to cities.

From the farming side of our food system, the status quo - as shaped by the current agricultural and food policy frameworks - are not serving family-scale independent producers, as the following academic and government reports demonstrate:

- According to USDA, poverty levels are higher in rural counties in every region of the U.S.; Furthermore, there has not been a significant decline in rural poverty for forty years.<sup>6</sup>
- As corporate consolidation and government deregulation allow food systems to be increasingly concentrated, the negative health impacts of increasing anti-biotic use, and resulting antibiotic resistance, are well documented, with the Center for Disease Control (CDC) labeling this dynamic a global health threat.<sup>7</sup>
- As fewer farmers must farm increasing numbers of acres, the reliance on the use of synthetic fertilizers, pesticides and chemical inputs also continue to rise.<sup>8 9 10</sup>
- The culmination of socio-economic disenfranchisement and environmental stress is having profoundly negative impacts on mental and public health in rural communities.<sup>11</sup> The CDC has also found that suicides are 45% more likely in the rural areas than urban areas<sup>12 13</sup> This is real and personal. I recently learned that a childhood friend has twice attempted suicide, and a neighbor shared with me that she knew of several women who were concerned that farm stress was so extreme that their husbands might also try to take their own lives.

---

<sup>4</sup> The Cap Times: [https://madison.com/ct/opinion/column/rep-mark-pocan-and-nell-abernathy-mega-mergers-in-the/article\\_ffb30687-7c00-53b6-acc3-b5368a3dc954.html](https://madison.com/ct/opinion/column/rep-mark-pocan-and-nell-abernathy-mega-mergers-in-the/article_ffb30687-7c00-53b6-acc3-b5368a3dc954.html)

<sup>5</sup> StarTribune: <http://www.startribune.com/a-tough-row-to-hoe-as-farmers-age-young-ones-can-t-buy-land/564328302/>

<sup>6</sup> USDA: <https://www.ers.usda.gov/topics/rural-economy-population/rural-poverty-well-being/>

<sup>7</sup> CDC: <https://www.cdc.gov/features/antibiotic-resistance-global/index.html>

<sup>8</sup> USDA: <https://www.epa.gov/pesticides/pesticides-industry-sales-and-usage-2008-2012-market-estimates>; note the lack of regular reporting on this by USDA: <http://www.panna.org/blog/us-and-world-pesticide-use>

<sup>9</sup> Noting the public health implications of this chemical intensive approach to farming are concerning, with public health research linking children's low-level pesticide exposure to ADHD and autism: Pediatric Research:

<https://www.nature.com/articles/s41390-018-0200-z>; National Institute of Health:

<https://www.ncbi.nlm.nih.gov/pubmed/30337670>

<sup>10</sup> Nitrates and chemicals in rural and urban water supplies further elevate health risks.

<sup>11</sup> Medscape: <https://www.medscape.com/viewarticle/920968>

<sup>12</sup> CDC: [https://www.cdc.gov/mmwr/volumes/66/ss/ss6618a1.htm#F1\\_down](https://www.cdc.gov/mmwr/volumes/66/ss/ss6618a1.htm#F1_down)

<sup>13</sup> This research supports devastating reporting by the Guardian which found that "male farmers in 17 states took their lives at a rate two times higher than the general population in 2012 and 1.5 times higher in 2015: [theguardian.com/us-news/2017/dec/06/why-are-americas-farmers-killing-themselves-in-record-numbers](http://theguardian.com/us-news/2017/dec/06/why-are-americas-farmers-killing-themselves-in-record-numbers)

*NFFFC's mission is to mobilize family farmers, ranchers, and fishermen to achieve fair prices, vibrant communities, and healthy foods free of corporate domination.*



Independent family farmers are arguably in the worst crisis since the 1980s<sup>14</sup>, with net farm income declining as costs of inputs have increased, while at the same time agricultural corporations – the chemical and seed companies, multi-national grain traders, the large-scale food processors – continue to profit. Increased access to foreign markets, to technology, and to information and education have, without a doubt, staggeringly failed to support rural economies, benefit farmer health, address climate change, or keep farming families on the land.

As family farmers in America continue to struggle with the health, economic and environmental impacts of the industrial food system, this food system is also failing consumers – rural and urban:

- According to USDA, the number of people facing food insecurity in America – on the order of 14.3 million households - was still higher in 2018 than in the year 2000.<sup>15</sup>
- Both adult and youth obesity has increased 9.1% and 4.6% respectively.<sup>16</sup>
- And grocery stores are increasingly disappearing from small town America.<sup>17</sup> As corporate chains like Walmart undercut independent grocers, Walmart's increasing vertical integration has led to fewer stores, leaving small towns literally without a place to buy food, except for highly processed and shelf stable foods from Dollar General stores, which provide few or none of the food groups the CDC recommends for a balanced diet: whole grains, fresh fruits and vegetables, lean proteins, and dairy products.<sup>18</sup>

The current government's commitment to these policies are furthering the collapse of U.S. food systems, rural economies, and farmer health.<sup>19</sup> Additional evidence of this misguided policy approach by USDA includes:

- Over the past year, the USDA has deregulated hog processing standards and significantly slashed the number of meat inspectors.<sup>20</sup>
- Chronic underfunding of nutrition research.<sup>21</sup>
- Revision of SNAP eligibility rules, in direct contradiction to the legislative authority of Congress, which threatens to withdrawal access to SNAP for 982,000 children and low-income students.<sup>22</sup>

These problems are highlighted to emphasize the urgent need for reform of food and agriculture policy in the U.S., and for these reforms to be based upon international guidelines like those generated by the CFS that address the underlying problems our food systems are facing today.

---

<sup>14</sup> USDA: <https://www.ers.usda.gov/topics/farm-economy/farm-household-well-being/farm-household-income-forecast/>

<sup>15</sup> USDA: <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/interactive-charts-and-highlights/#trends>

<sup>16</sup> CDC: <https://www.cdc.gov/nchs/data/databriefs/db288.pdf>

<sup>17</sup> NYT: <https://www.nytimes.com/2019/11/05/us/rural-farm-market.html>

<sup>18</sup> CDC: <https://www.cdc.gov/obesity/adult/causes.html>

<sup>19</sup> StarTribune: <http://www.startribune.com/sonny-perdue-to-farmers-go-big-or-just-go/562216182/>

<sup>20</sup> Washington Post: [https://www.washingtonpost.com/national/usda-to-shift-some-inspector-tasks-to-pork-plant-workers--in-everything-but-name/2019/05/23/9808cc50-66af-11e9-82ba-fcfeff232e8f\\_story.html](https://www.washingtonpost.com/national/usda-to-shift-some-inspector-tasks-to-pork-plant-workers--in-everything-but-name/2019/05/23/9808cc50-66af-11e9-82ba-fcfeff232e8f_story.html)

<sup>21</sup> Politico: <https://www.politico.com/news/agenda/2019/11/04/why-we-dont-know-what-to-eat-060299>

<sup>22</sup> US Government: <https://www.regulations.gov/document?D=FNS-2018-0037-16046>

*NFFC's mission is to mobilize family farmers, ranchers, and fishermen to achieve fair prices, vibrant communities, and healthy foods free of corporate domination.*



Having provided an overview of the systemic challenges facing our food system, with negative impacts on both producer socio-economic sustainability and consumer health, the following comments highlight the core policy elements that are needed in the U.S. that we hope will be reflected in the CFS guidelines and USDA's approach to this area of work:

- The structure of the Zero Draft takes uses highly technical, prescriptive, and narrow definitions of nutrition and food systems. We believe this approach should be revised to emphasize the interrelation and inter-dependency between public health and socio-ecological sustainability. To reach this goal, we suggest that the format of the guidelines be changed to reflect the following five pillars:
  - **Governance of food systems** – States are primarily responsible for governing sustainable food systems. But States must support participatory approaches to policy-making in this area to ensure that the rights and needs of historically marginalized and under-represented communities are respected and incorporated into policy-making processes. To achieve this goal, it is essential that a human rights-based approach be central to nutrition and food systems policy and public programming. In particular, explicit support for the Right to Food<sup>23</sup> and UN Declaration of the Rights of Peasants<sup>24</sup> should be mainstreamed throughout. We request that an explicit mention that the Right to Food is indivisible from other human rights. Finally, we call on States to ensure there are safeguards to prevent conflicts of interest during these policy-making processes.
  - **Protection and regeneration of nature in food systems** - Nutrition and food system policies must be framed as being inextricably linked to production systems, and must advance sustainability goals. We strongly support the CFS Food System and Nutrition Guidelines explicitly support food system transitions to agroecology<sup>25</sup>, following the recommendations of the High Level Panel of Experts on Food Security and Nutrition (HLPE) report #14 on Agroecology, and promote ecological sustainability and the socio-economic resilience of rural peoples. In particular, we call for the elimination of government support for on-land, and off-land, confined livestock/fish production systems that necessitate over-use of antibiotics, and support pasture-based and wild-catch food production systems.
  - **Health and Wellbeing** – The prevalence of highly processed foods, including dairy Milk Protein Concentrates (MPCs), undermine local food systems, farmer economic autonomy, and public health. We urge the CFS to explicitly discourage production and consumption of ultra-processed foods including MPCs. In addition to ultra-processing, we believe that bio-fortification is a false solution to addressing malnutrition in North America and abroad.
  - **Trade** - we emphasize that international trade agreements are highly destabilizing to local food systems, and often undermine food sovereignty. We call for trade agreements to be reformed

---

<sup>23</sup> CFS: <http://www.fao.org/3/a-y7937e.pdf>

<sup>24</sup> UNGA: <https://undocs.org/en/A/C.3/73/L.30>

<sup>25</sup> CFS HLPE: <http://www.fao.org/3/ca5602en/ca5602en.pdf>

*NFFC's mission is to mobilize family farmers, ranchers, and fishermen to achieve fair prices, vibrant communities, and healthy foods free of corporate domination.*



to be strongly rights-based, with explicit support for the Right to Food and ILO conventions on labor rights in all cases.

- **Mode of Production, Employment and Exchange in Food Systems** - The guidelines should offer policy recommendations that explicitly address corporate concentration in rural economies, as a contributing factor to negative public health and ecological outcomes. And finally, public institutional procurement from and for family farmers and local food systems should be emphasized as a potential policy tool to support family-scale operations and sustainable food systems.

As a farmer, I know that to produce food is a great privilege but also a great responsibility to produce food while protecting our land and water, our families and communities. Yet farmers must work within multiple crises, including their own financial crisis, which is how I describe the situation in my community. The 2019 FAO State of Food Insecurity (SOFI) report<sup>26</sup> shows that hunger is rising even with plenty of food being produced, as with the global glut of storable grains, and farmers everywhere are receiving prices that are far too low. Farmers themselves are among the hungry. They must work within a serious climate and biodiversity crisis which is closely related to hunger. A farmer can look into his or her toolbox and find technologies that promise good things but some are unacceptably costly to the environment and extract wealth from farmers and rural communities, and now, they can find technologies that will also extract their knowledge.<sup>27</sup> In contrast, the agroecology toolbox has an array of tools that will help us address the root causes of hunger and uplift the role of the family farmers and small scale food providers. Agroecology has been articulated by the farmers with a vision of transformational change to our food system based on a vast and growing body of science, practice, and social movement. The technologies used in agroecology are evaluated on an ethical level in how they create better lives for the women and men who produce food and allow farmers to work with nature.

In conclusion - Rural America is in a food and farm crisis with profound nutritional and public consequences, and there is a severe lack of political leadership in addressing this crisis. Many will point to this failure as evidence that government policy is unable to address the needs of rural America, and push for *more* of the deregulatory approach that has delivered this crisis. We reject this premise that public policy cannot help family farmers and rural communities, and also reject the status quo frameworks that are failing rural America. Structural reform from a food and farming systems approach, which recognizes that social, ecological, and nutritional health are inter-related, is urgently needed. We call on the U.S. government to respect the participatory and multilateral process of the CFS, and abide the international standards emerging from the CFS on nutrition and food systems to serve as the basis for developing forward-thinking policy that protects the needs and interests of rural and historically marginalized communities.

---

<sup>26</sup> <http://www.fao.org/publications/sofi/en/>

<sup>27</sup> <https://federalnewsnetwork.com/big-data/2019/10/usda-pilots-data-driven-smart-farms-powered-by-internet-of-things-ai/>;

[https://journals.sagepub.com/doi/full/10.1177/2053951719849444?fbclid=IwAR1VDsb\\_mknMun7pPEy16Pzceo5NMPNpxWmBair\\_Y\\_ARhWPI0YBfquKQTz&](https://journals.sagepub.com/doi/full/10.1177/2053951719849444?fbclid=IwAR1VDsb_mknMun7pPEy16Pzceo5NMPNpxWmBair_Y_ARhWPI0YBfquKQTz&)

*NFFC's mission is to mobilize family farmers, ranchers, and fishermen to achieve fair prices, vibrant communities, and healthy foods free of corporate domination.*