

USDA Equity Commission

Public Meeting #6: Written Comments

The following questions/comments were submitted via email between July 16, 2023 – November 10, 2023, in response to the Federal Register Notice for the Sixth Public Meeting of the Equity Commission held October 24, 2023, through October 26, 2023. The written comments have been categorized into two groups: Questions and Comments. Within each group, written comments are sorted first by date and then alphabetically by last name. All attachments provided are included at the end of the document.

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Questions:

1. [Cathy Huydhe](#)

Received by Email: 07/24/2023

Hello,

Jay Ivey, State Outreach Coordinator for Director Arthur Tripp's Farm Service Agency office in Georgia, suggested I reach out to you.

I'm an Atlanta-based business owner of a technology company, called Enolytics, that works with wineries across the country. Our software "upskills" women who work in viticulture, and therefore agriculture, with new literacy about data and technology.

Director Tripp and Jay both thought that this could be something that the USDA's CDIO Ms. L'Tonya Davis would be interested in knowing about.

Could you please identify the best person for me to talk to? We would like to expand our technology education program to more women through the wine industry.

I look forward to your thoughts, and thank you in advance for your help --
Cathy

2. [Saul Blair](#)

Received by Email: 08/28/2023

Good afternoon. Our family has heir's property in Washington, GA. We are in need of assistance in determining if white landowners obtain our land properly. Also, white landowners had denied us access to over 100 acres of our land. Who would you recommend to assist us regarding these issues? We cannot afford an attorney. Does the USDA have a department who may give us assistance? Thank you for your assistance.

Comments:

3. [Rachel Hacker](#)

Received by Email: 07/22/2023

work with about 10 H2A Visa Employees.

Violations:

1. Clearance order calls for 8 visas. La Alianza brought in 14 to 16 Visa Labor employees.. unclear how this occurs. Possibly brought labor from other h2A requests and sent them to this site.

2. Employees here left as a group to other work during slow time off site.
 3. Confirmed employees on "Visa" take work at neighbors vineyard as needed. Asked for work in these areas, and was told we don't need, and "no inteieneo".
 4. Adverse effect to US Labor Force: unconcerned and unhelpful and destructive creating a nuisance and instability and inaccessibility to US Labor. * Reporting menial and unimportant "violations" to instigate American employee termination. Working as a foreign unit and not acting as a team or befriending American associates. Taking work in the area at a reduced wage illegally, and not including/ostracizing American co workers from opportunity.
 5. The employer and Growers is Persuading Americans they must also "leave and be terminated" when "contract is up if you last that long", while having Labor shortage jobs listed all over the State of California year round. Not advising US Applicants of permanent Hire rights. Negative Recruitment.
 6. Nationality Violations against Americans - allowing Foreign Labor to work and not allowing Americans to work because "no one is available to train you in English". Letting the American "🍷 bench" until English Supervisor is back from Vacation.
 7. Wage record keeping Violations: telling American that "benched hours" will be paid the same hours as the Crew works - then not supplying hours worked documentation to American, nor a time card.
 8. Discrimination and Anti American Segregation: After being coached on Safety procedures - telling American they can not work, train, watch or participate in the work day at all and can "go home" if so desired causing employee to become weaker through inactivity. Keeping American employee uninformed about daily activities of the farm.
- Retaliation: when concerned about not following through with schedule to Grower American was told "we are in California and are and employer at Will, remember that".
9. Poor communication and harassment: employer, La Alianza, and Sun Valley Growers, promised to bring and supply safety items for personal and home use, and habitability issues and did not deliver the items. Stopped responding to American correspondence.
 10. Refused to provide onsite contact for highest supervisor.
 11. Threatening job stability: after 2nd day for a non viable reason reported by an "unknown H2A supervisor" for bumping an unlocked farm gate with vehicle to open it. Threatening to send a formal "warning" on record - no damage done to gate, more damage done to vehicle after gate bounced shut on car. No training provided in advance. Please note that report by alleged "supervisor/senior employee" shows lack of true experience as independent farmers given the common oricatrice of fence bumping. <https://m.facebook.com/Thatsfarming/videos/lazy-man-gate-opening/1377658055625860/>

Note: No "Farm Labor Organization-non profits" including OHDC, and others have offered to take on any cases presented by myself and have instead focused on aiding illegal immigrants access to wages, work, housing, and status cases.

4. Rachel Hacker

Received by Email: 08/10/2023

Filed with the American Job Centers Workforce Development Board , Rogue Workforce Development Board,LLC. Medford - OR

JOB OPENING \$18 HOURLY plus Piece Rate O experience required.HOUSING & TRANSPORTATION to the job from anywhere in the Country. One month, Every Year. Pruning available in the winter.

Email ila.farmandag@gmail.com for advocacy and updates on job information or text/call 541-787-5904.

*Over 300 harvesters in Medford, Oregon and surrounding areas!! Base Wage, Adverse Wage \$18.00 PLUS Piece rate up to \$27 an hour.

CURRENT LISTING: <https://seasonaljobs.dol.gov/jobs/H-300-23177-144848>

ETA Complaint 005: Bear Creek Job Listing, Medford Oregon - Harry and David's/ 1800Flowers: US DOL WHD Co of BOLI Workforce Development

Bear Creek Job Listing - Serviced by the Business Services Office in WorkSource Medford, OR. Following complaint regarding business services being in conflict of interest to the local laborers and labor force of Southern Oregon, and USA -

1. for remedy by Business Services
2. For remedy where job listing posted on Harry and David's employment opportunities website are withholding info from US Labor.

Re a claim stated by the Bear Creek Corp, that there is no sufficient general labor in the USA to pick pears - thus the advertised job must contain the wage offer.

The job listing only states the Adverse Wage in the job listing advertised to the general public and -

Omits a piece rate

Omits free transportation to and from the housing

Omits ID and other passport related compensation

Omits free boarding

Omits any other compensation or incentives offered.

I am stating that this is a discriminatory post as - many applying for work Visas may be abridged of the other compensation ; where as Americans Citizenry would have no way of knowing these other required compensations unless it was listed as a base Wage advertised.

I am requesting that Bear Creek in all postings of this job, be audited for withholding compensation to US Citizen applicants, while through requestng Visas for Foreign Nationals - they update them and disclose all compensation and go so far as to arrange pre hires transportation for them at the US Border in Nogales. Where no such offer is made to US Citizens.

This is a claim for discrimination on positing by Bear Creek, LLC aka Harry and David's.

EEOC Complaint against Bear Creek/ Harry and David's , 1800 Flower, Medford OR.

US DOL Wage and Hour Division -

Also, not having educated staff able to easily assist US Applicants for this position in English.

All available US Citizens whom apply to farm work at this company are routed into less paying and less desirable jobs with hard late grave yard hours, ect..

Sincerely,

Rachel Hacker

5. James Quarterman

Received by Email: 08/21/2023

Good afternoon

My name is James Quarterman. I'm FMG farm LLC – USDA Farm # 4455, FMG is USDA 860 registered socially disadvantaged and as of December 2022, I am an elected First Alternate FSA County Committee Member (“CCM”). I ran for CCM because USDA sent me a document saying USDA require a social disadvantaged (“SDA”) or limited resource person for equal representation in my USDA LAA. Look at the following USDA published document—look at the address bar and its shows this is also published on USDA website – so that makes this an official USDA public document and Statement.

I filed my discrimination complaint via the online form – so you have to get a copy from OASCR. Again USDA published a document that states my USDA LAA require, it didn't say need, want or would like to have, its unequivocally states and I quote;

“Walton, Georgia has been identified as requiring a historically underserved member for fair representation in 2022.”

it didn't say would like to have it didn't say might want it says USDA requires, and as SDA for fair representation. I ran in my local LAA election and was elected "First Alternate" in December 2022. The farm bill explicitly states that the secretary has delegated authority to the FSA administrator to appoint to those FSA committee with full voting power.

USDA then published this information in the Federal Register at this website ([Federal Register :: Selection and Functions of Farm Service Agency State and County Committees](#)) stating consistent with the 2002 Farm Bill, the purpose of the amendments is to increase the transparency and accountability of county elections and to provide opportunities for the nondiscriminatory participation of socially disadvantaged (SDA) farmers and ranchers in county committees and in the programs of USDA. This published USDA document in the Federal Registry also states under the Section Titled: New Provisions To Appoint SDA Members to County Committees; it unequivocally states that the 2002 Farm Bill grants the Secretary the authority to appoint a committee member to a committee to achieve the goal of fair representation in a county committee jurisdiction. The 2008 Farm Bill requires the Secretary to develop procedures to maintain SDA representation on county committees. Since the 2002 Farm Bill, USDA has increased outreach to SDA communities to encourage participation in COC elections (that's the letter I got asking and telling me to run). Walton County Georgia LAA 3, my LAA has 5 elected white men and 2 white men non-voting advisors.

However, voter turnout has remained low among all groups, and particularly among SDA farmers and ranchers, whose voter participation rate is about 7 percent. That is about half the voter participation rate for all eligible voters. USDA has also collected and analyzed extensive data on county committee election results, and found that a few counties (about 5 percent) still do not have fair representation of SDA farmers and ranchers. Given the continued low SDA voter turnout, despite sustained and extensive outreach over the past decade, it is unlikely that the regular election process alone will result in fair SDA representation on all county committees. USDA has therefore decided to utilize the appointment authority provided in the 2002 Farm Bill.

According to CNN, the US Department of Agriculture's [Equity Commission](#) on Tuesday February 28, 2023 presented more than 30 recommendations it hopes will extend opportunities to communities of color and help resolve [longstanding discriminatory practices](#) across the agency, according to a copy of the interim report first obtained by CNN. In particular, the report calls for greater diversity across the agency, equitable access to USDA programs and accountability for the USDA to follow through on recommendations that are implemented.

Included in its 32 recommendations, the report where the #1 recommendation is:

- Specifically lays out suggestions for diversifying county committees – powerful boards made up of elected local farmers who help with outreach and make determinations on Farm Service Agency programs – and funding for community organizations to help resolve [heirs' property issues](#), which involve family land that has been passed down that does not have a deed or will to show proof of ownership.

FSA county committees must have equal representation that's a law congress pass that's a law USDA is obligated to follow. I called the FSA administrator as the local LAA wouldn't even invite me to the mandatory organizational where elected members are sworn in. Neither would they even allow me to come to meeting where according to federal law if my elected member gets sick, die or whatever I am to replace him with full voting authority – so how can I be do that when I can't even go to the meeting to know what's even going on.

I contacted FSA administrator and according to documents submit in my complaint, the FSA Administrator is who FSA CCM report to, and left a voice mail message advising him of what was going on. The Administrator then sent me a text at about 8:30 on a Sunday morning while we were getting ready for Church and told me what the local FSA office was doing to me was wrong and he used the word "Discriminatory. "After talking for a while he assured me the issued would be addressed and if a black and an Hispanic were both elected then they should be allowed to serve in some capacity especially when you have two advisor. He said the Secretary had given him authority to appoint and that we would at least be put on the committee as advisor as in the case we are needed as an advisor we could attend meetings to know what was going on in case we had to be called to replace one of the members. He said he would handle and correct that as he had looked at our county and saw why USDA published the notice that they require a SDA in my LAA.

A couple months went by and I never heard back from the Admittatur when I again called, texted and emailed the Administrator inquiring about his promise to resolve the issue and his direct reply was to give him until next week. That was almost 3 months ago.

So the FSA Administrator as an appointed FSA official has lied to a federal elected official in official capacity as the USDA FSA Administrator, that in itself is a violation of federal law, lying to a federal official about federal related business. His lies has caused me and the other Hispanic elected in December 2022 to be Discriminated against by an official appointed member of USDA Administration. My name is James Quarterman. I look to hear from.

6. John Egart

Received by Email: 08/26/2023

To whom it may concern,

After reading the interim report 2023 I would like for my company to be considered for recommendation procurement 18. Being undeserved and underrepresented company we are able to prime and lead. We were at the national hubzone conference this past week and saw opportunities with USDA in out break out sessions. Can we set up a time next week for a 15 minute call or zoom call. This is a perfect program for my company and to support USDA missions.

Here is my company capability statement. Thank you for your time.

Kind Regards

John Egart - K & M Landscaping and Design

7. Robin Woolbright

Received by Email: 08/30/2023

Good Afternoon:

I am requesting a compliance review and assistance from your office. I believe that I may be faced with a discrimination situation related to compliance issues for illegal borrow pit activities, being conducted by

a business on property adjoining my residence. The business owners activities are a nuisance, invasion of my privacy, unsafe, not being monitored/regulated and a concern in a community that is predominantly black. In addition, the value of my home is being jeopardized.

The business owner allegedly applied for a permit. I am concerned that the agencies involved may grant him only because the county expressed his activities were legal, although he had no permit. The other agencies made no mention to me related to what office supported his activities. The EPA keep referring me back to the county, while informing me that their hands are tied and the county, who lied to me, make decisions about how close borrow pits can be to a residence and residential septic tanks, inspite of Florida Statues, ordinances, and EPA guidelines. I am looking for fair and eqitable treatment as a USDA customer, I want to ensure, fair, honest, and quality treatment by all agencies involved, be it Florida EPA, Baker County Authorities, St. John's Water Management Dept, and any other involved persons or agencies related to this permit issue. I would like to be reassured that all applicable laws, statutes, administrative rulings, county ordinances, and agency policies/practices and additional safety issues were met by the appropriate enforcement agency, while considering and protecting rights of homeowners, if the permit is granted.

Although home owners residential rights are governed by different laws, they must coincide with permit decisions. The same way County laws must comply and coincide with State laws. State laws must coincide with Federal laws.

I initially tried to work something out with the business owner to no avail. I then contacted the Baker County Planning and Zoning office who informed me that noise, etc is hard to prove. I was told that others in the community have complained but the business owner is not doing anything illegal. I was later informed by Florida EPA and and St. Johns Water Dept, that the business owner does need a permit for his activities but never applied for one. He was subsequently advised of his need for a permit. In the mean while, he continues to conduct his borrow pit activities. I was told by the agencies involved that they would keep me updated. I am afraid that he will be granted a exemption permit. His being that close to my property line and septic tank are safety concerns, as well. EPA informed me that these last issues were up to Baker County, inspire of state laws. That scares me.

I am 68 years old receiving treatment for my lung cancer. The treatment has been effective, thus far. I I have a M.S. of science degree. I have worked since age 14. I retired after my cancer diagnosis and built my house in the country for peace of mind, as planned when I purchased the property in 2007.

I agreed to extend my easement an additional 30 feet, after the seller convinced me that it would accommodate service providers for residents who would eventually build a home behind my dwelling. The example I received was to provide utility company, cable company, water company, etc, enough access to service residents. Access to a business for ongoing profitable activities on the easement, was not mentioned. These activities were not ever discussed with me. It was not until my builder informed me in 2021 that a business was utilizing the easement. I also discovered he had covered the existing road with dirt to accommodate his commercial trucks.

This situation is killing me and a violation of my rights. I reached out to your office because my pleas appear to possibly be falling on deaths ears.

I have documentation related to all I have corresponded with in addition to pictured. I can forward the information.

Thanking you in advance. Attachments will follow.
Robin Woolbright

8. Robert Harper

Received by Email: 09/01/2023

Let's EquityCommission connect to Fleet Manager EV Electric Vehicles Trucks and Smartcar implementing Model Globally Marketing all AvailabilityZones and there's inner Cities Regions, Messtone LLC Corporate Productivity Globally Manufacturing Geographically Shipping resources Canada Mexico South America Asia Pacific Singapore China United Kingdom Europe Brexit and Sydney Australia import and export.

Fleet Manager implementing Model at Globally'<https://www.messtonecoms.com>

Thanks you for your support!.

Veteran Owner Enterprise Supplychain.

9. Suzi French

Received by Email: 09/11/2023

Monica

Again I ask you to tell me where to make payments before you find me in default. Also the divorce decree states that I am the owner of 3032 Hwy 94 and you have not responded fed to me on getting davin off the deed. Again here is the divorce decree. Since you completely erased me in the 2022 year from all documentation in your office again dehumanizing me and making me again like I do y matter to this farm even when I am the only Native American woman farmer that is currently farming in my tribe, county but apparently your office can just erase people from paperwork.

You also took sides with davin and provided letters to the court Suzi French

10. Rohit Kumar

Received by Email: 09/13/2023

Most Honorable Respected Sir/ Madam,

Today I am sharing this information with you. Presently we have developed three new cellulose fibres. These three fibers' inventors name are Dr. Anupam kumar and Mr. Rohit Kumar from India.

This plant is easy found in America. These two fibres are basically produced for plant to natural cellulose fibre and very easily process to plant converted fibre foam. These three fibres plants are very easily cultivation and not need more water, any atmosphere this is very easily grow it .

It is very easy to extract fiber from this plant. New fiber which is similar to cotton. This fiber has 85% cellulose which is second in the world. I want to extract cellulose from this fiber and make biopolymer, cellulose gel, cellulose film, microcrystalline cellulose from it.

I want to continue our research with you. I have unable to do my research due to lack of high tech laboratory and machine. If you like my work then Sir, please invite me in any research program and sponsored . So that I can do more research on fiber and plant .

We can cut it 10 to 15 times. We can get fiber by planting these plants in empty deserts, jungles. No animal eats these plants. We can extract fiber from this and give it to the paper industry in the form of raw material.

Sir, I have 14 patents and I am M.Tech student, sir, along with this research, I also started doing PhD under you, if you like my research work.

The income of the farmers will increase a lot by its cultivation. Sir, with this fiber coming in the market, we can contribute a lot to the state economy.

Total we have sent three new invention fibres briefly details .

Thanks so much, Sir

Regards

[ATTACHMENT-All Fiber details]

11. Gordon Li

Received by Email: 09/27/2023

Hello,

I hope this email finds you well. My name is Gordon Li, and I am the Manager at Artlangs, a certified Language and IT services provider specializing in translation, localization, and interpreting.

I wanted to reach out to you today to discuss the possibility of collaborating with your company.

We offer expertise in a range of languages, including English, Spanish, German, and Portuguese, as well as Asian languages such as Simplified Chinese, Traditional Chinese, Japanese, Korean, and Malay.

At Artlangs, we understand the importance of providing accurate and culturally appropriate translations that meet the needs of your target audience. Our team of expert linguists and industry specialists are dedicated to delivering high-quality translations that exceed your expectations.

To ensure we can provide the best service possible, I have a few quick questions to better understand your translation needs:

1. Which language pairs do you currently work with the most?
2. What industries or content do your projects typically involve?
3. What is the most important factor for you when evaluating a new vendor?
4. What are your expectations for our collaboration?
5. If we meet all your requirements and everything goes smoothly, when could we launch the first project?

To learn more about our services, please visit our website: Artlangs.com. If you have any questions or would like to request a quote, please feel free to contact me. I am looking forward to discussing how we can support your business further.

If you are interested in exploring a collaboration with us or have any translation needs in the language pairs we specialize in, please do not hesitate to reach out to me. I am available for a quick call at your convenience.

Thank you for considering Artlangs as your translation vendor. We are committed to providing quality language services and making a positive impact.

Best regards,
Gordon Li

12. Steven Sprinkel

Received by Email: 09/28/2023

Greetings to all.

EcoFarm (The Ecological Farming Association) has been investigating the numerous beneficial roles played by urban agriculture in:

- Producing food where people live
- Making a fresher-quality product convenient for people
- Educating people about the benefits of better nutrition
- Managing organic matter where it's found

We were dismayed to learn that the USDA's Office of Urban Agriculture and Innovative Production may be discontinued under the Farm Bill now under consideration. At this busy time, could we ask the help of the USDA's Equity Commission to support continuing urban agriculture formally?

We feel that this is the wrong time to abandon a project with so much promise that, in the financial scheme of the US budget, is rather a modest allocation.

The Ecological Farming Association is a forty-year old community of organic farming proponents and educators which sponsors the annual EcoFarm conference every January in Pacific Grove, California.

13. Aleida Fernandez

Received by Email: 10/02/2023

Hello,

We are a team of technologists from within the General Services Administration (GSA) who run a program called 10x, and we have an opportunity to fund diversity, equity, inclusion, and accessibility-focused technology projects.

We've identified you, your organization, or your team as dedicated to promoting equity in public service. [One of 10x's FY24 focus areas is *Equity in Delivery*](#), and we believe that submitting ideas to 10x could be a great way to further the missions of your organizations and get equity/technology ideas supported by a Federal technologists. A few examples of equity-focused technology projects (all of which were submitted by federal employees to 10x) include the [Combating Bias in AI/ML Implementation](#), [Equity Centered Design for American Indians and Alaska Natives](#), and [Multilingual Glossary Tool](#).

Submitting an idea is easy: [just write a description of a problem you want to solve in a few sentences](#). Example topics that meet the spirit of *Equity in Delivery* include civil rights awareness, privacy preservation, simplifying the process for understanding government services and programs, environmental justice, and social safety net innovations. A good brainstorming question to generate ideas for this theme is: *What government-provided services could use technology to better serve the people typically left out or frequently overlooked?*

The deadline to submit ideas to 10x is 11:59pm EST November 30. *Please feel free to reply to this message with more questions*, and please feel free to forward to other DEI&A-focused teams within your networks. We have also attached our marketing flier and overview deck for your consideration and to forward to your teams.

We look forward to reading your submissions,

[ATTACHMENT- 10x FY24 R1 Slick Sheet]

14. Angelica Royal

Received by Email: 10/02/2023

Hello,

My last day here at USDA is on October 6th, 2023. I am initiating contact related to internal control issues that I have identified within the workplace. Additionally I also have identified several regulatory guidelines that are currently not implemented within USDA. Although I have initiated complaint process. I also thought that your committee may be pivotal in implementing changes. I noticed one of the goals identified is a need for department-wide change. I would like to identify what I have discovered within the workplace and would like to discuss this with you if you have time. I can be reached via email until Friday.

After that my personal cell is [redacted].

Thank you for your time and I hope to hear from you soon.

Very respectfully,

15. Jean Public

Received by Email: 10/08/2023

please send me the link to join the meeting starting oct 24, 25,26, i dispute your claim that there is aracialgap in agriculature. and i dispute that there is longstanding inequity in agribusiness. i note no link to any studies documenting this in yiour proposal. i do not think we need a 3 days meeting either. and it shoudl be virtual so that all americans can join,. this comment is for the public recordplease receipt. jean publiee jeanpublic1@yahoo.com

16. Lisa Gonzalez

Received by Email: 10/09/2023

Good morning,

Thank you for your great work. On behalf of the Federal Good Food Purchasing coalition, I am submitting these written comments in advance of your public meeting. (Please note, we had previously emailed these to the commission and are resubmitting for this formal comment period). Thank you and please reach out if you have any questions or would like to schedule a meeting to discuss these in more detail. Thank you,

[ATTACHMENT-Memo Recommendations for Leveraging USDA Procurement to Advance Equity]

17. Kayla Mattson

Received by Email: 10/09/2023

I am writing to you as a Farm Service Agency County Office employee and as a member of the National Association of Farm Service Agency County Office Employees (NASCOE). Our organization represents the nearly 7,000 employees who deliver farm and conservation programs through the U.S. Department of Agriculture's (USDA) Farm Service Agency (FSA) county office system. We remain concerned with USDA's consideration of restructuring FSA's county committee system and eliminating its current makeup and authorities. Our organization conducted our annual meeting in August, which included review of the county committee system. With resounding agreement from our membership and farmer-elected committee members, we support the Department of Agriculture's FSA county committee system. Our members adopted the attached resolution which is provided for your review.

I ask you to please consider that the employees across this great nation are devoted to providing equitable service to all farmers and ranchers, support American agriculture and that is what motivates us to go to work each and every day. As a County Executive Director, I work for and with my County Committee to ensure that the members understand the various programs that we have available and to present program applications, contracts, etc. to them to act upon according to FSA directives. Through communication with the members, and various outreach events, we work together to ensure the public is aware of our programs that are available. My County Committees have regular meetings with myself, my office teams and with a State Office representative to ensure that there is proper handling of FSA programs and policy. Each of my County Committees are involved in developing and overseeing my performance in which they are able report their concerns or noteworthy items to a STO representative. The County Committees that I am fortunate to work with are critical to me being able to ensure that I, and my dedicated staff, have the knowledge and resources to do our jobs and to bring forward questions or concerns that they hear from those producers in the areas they represent.

As a County Office employee, and a member of NASCOE, I fully believe that involvement of local producers remains a critical component of implementing and delivering farm and conservation program benefits and any change to diminish their authority would be detrimental to the fundamental purpose of how FSA became to be known and created. Thank you for your time.

Respectfully Submitted,
Kayla Mattson

18. Amy Nelms

Received by Email: 10/10/2023

Memo: Recommendations for Leveraging USDA Procurement to Advance Equity

To: Members of the Equity Commission

Cecilia Hernandez, Federal Designated Officer, Equity Commission

Lionel Savage, Senior Advisor, Equity Commission

From: The Center for Good Food Purchasing

[The Center for Good Food Purchasing](#) transforms the way public institutions, across the nation, purchase food by fostering transparency and equity in our food system through shifting purchasing to support five core values: local and community-based economies, community health and nutrition, valued workforce, animal welfare, and environmental sustainability. We are excited about and supportive of the Equity Commission’s report, “Recommendations for Leveraging USDA Procurement to Advance Equity”.

With the [Federal Good Food Purchasing Coalition](#), we submitted a memo outlining a broad suite of equitable procurement recommendations to the USDA Equity Commission earlier this year [insert link to memo]. With these comments, we focus specifically on your FNS pilot recommendation. We are excited to see the FNS pilot program recommended to support diversifying suppliers benefitting from institutional purchasing. From our experience working with over a dozen states and nearly 25 cities across the US to shift to values-aligned purchasing, we are aware of the power this pilot could have to shift purchasing to support racial equity. Our experience also informs some key factors we know are needed for a truly successful equitable pilot program.

We recommend that the Equity Commission consider incorporating additional values into the pilot, in order to support the overall values outlined in the report. This could include awarding higher reimbursements to institutions sourcing from both local and regional underserved and socially disadvantaged businesses and meet additional equitable sourcing criteria such as:

- a) Produced by a small or mid-size family farm.
- b) Sourced from businesses or farms that engage in fair labor practices (as defined as produced or processed by a farm with employees who, as permitted by law, are represented by a collective bargaining agreement or memorandum of understanding.
- c) Produced or processed by a farm participating in a worker justice certification program.
- d) Sourced from vendors that have signed a labor peace agreement with a bona fide labor union; or Sourced from a vendor that is a worker-owned cooperative). Businesses with egregious, willful, or repeated labor violations would be ineligible to receive pilot funds.
- e) Organic or have another third-party environmental sustainability certification;
- f) Kosher, halal, or plant-based, and that qualify as a Meat/Meat Alternate; or
- g) Third-party certified higher welfare animal products.

We recommend that FNS work with partners that have a track record of supporting institutions with supplier diversification when providing TA. From our conversations with Good Food Purchasing Program

operators and community-based stakeholders, we know both producers and institutions face barriers when working together such as capacity to identify underserved and socially disadvantaged businesses, understanding institutional bidding processes, and ensuring source and supply chain transparency. Engaging with locally based partners can offer FNS critical support in implementing a successful pilot due to both trust established with institutions and partners and a knowledge base of key barriers and opportunities.

Lastly, we recommend that USDA report annually on the pilot program's progress including:

- a) The name and address of each supplier, distributor, and producer involved in the provision of the products supplies for the pilot.
- b) Information about vendor labor violations.
- c) The number of contracts and spend with socially disadvantaged producers and women-, minority-, or veteran-owned businesses.

We believe this will offer both transparency throughout the pilot and foster continual improvement throughout the course of the pilot, offering institutions checkpoints to evaluate their purchasing annually.

In regard to the recommendation for a set-aside program for minority, Tribal and women owned agricultural businesses for federal USDA purchasing overall we strongly recommend both Native Alaskan and Native Hawaiian to be included and named in that definition.

Thank you to the Equity Commission for the opportunity to share comments. The Center for Good Food Purchasing looks forward to the final report.

19. Kimberly Hammonds

Received by Email: 10/24/2023

Good Afternoon,

I would like to advocate that USDA include state-recognized American Indian tribes and individuals in its efforts, programs, and services. What are your outreach efforts to these tribes and if they are not included, I would like to know the reason they are not being included. Thank you.

20. Angelica Royal

Received by Email: 10/25/2023

Please see the attached letter related to recommendations for the USDA Equity Commission.

Thank you so much,
Angelica Royal

[ATTACHMENT- Letter to USDA Equity Commission]

21. Ren Quintero

Received by Email: 11/7/2023

I'm having civil right violations been done to me by Union county sheriffs department. I've tried to contact the internal affairs department. But I'm having no luck in them helping me. I'm a small farmer who is Latino. Me call me [redacted].

22. Ren Quintero

Received by Email: 11/7/2023

My name is Celerino Quintero I'm a small farm and I'm having civil right violations done to me by Union county sheriffs department. They will probably contact you cause they have my email Clon . Please contact me at [redacted].

ATTACHMENTS

ATTACHMENTS

Fibre Code: A1

Microscopic examination of Obtained fibre: The extracted **Fibres code A1** is further observed under Simple microscope and Scanning Electron Microscope (SEM). Under microscope, Rod like structure of extracted fiber was observed.

Chemical composition of Fibre code A1: Chemical composition such as Cellulose and hemi-cellulose content, Lignin and pectin content as well as amount of oil, wax and ash was determined. It was observed that, the fibre A1 comprises more cellulose content as compared to Sisal, ramie, jute flax, hemp, pineapple, abaca and abaca fibre. And cellulose content and moisture regain (%) of fibre A1 are somewhat similar to that of cotton fibre. (Table 1)

Table 1: Chemical composition (%) of fibre A1

Chemical composition	fibre A1
Cellulose	82.4 to 85 %
Hemi cellulose	11.9 %
Lignin	5.3 %
Pectin	2.4 %
Oil and Wax	1.1 %
Ash	1.2 %

Physical properties of Fibre A1

Further, the physical properties such as color, length, diameter, moisture regain, elongation break, content, density etc were determined .Cream coloured shiny and soft fibre were obtained with a length of about 5mm (min) to 30 mm (max). The strength of the obtained fibre is similar to that of wool, bamboo and coconut fibre whereas the density of the fibre is high as compared to other fibre.

Table 2: **Physical properties of fibre A1**

Physical properties	fibre A1
Colour	Creamy shine
Length (mm)	5- 30
Diameter (μm)	21
Single fibre Strength (Mpa)	141
Elongation break (%)	3.4
Moisture regain (%)	7.5- 9
Moisture content (%)	6.9
Density (g/cc)	1.2



Figure 1: Image Fibre A1

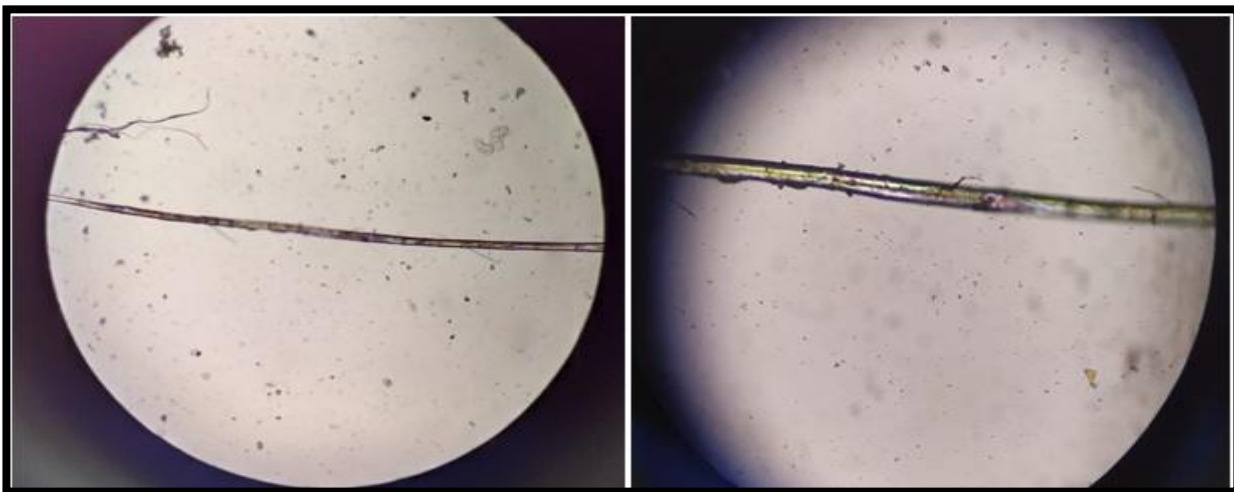


Figure 2: Microscope View for the fibre A1

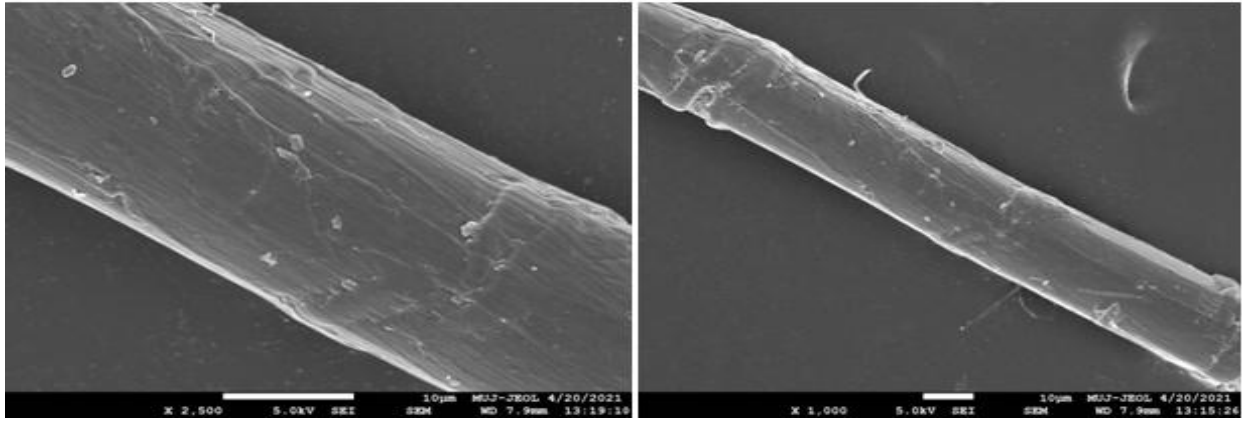


Figure 3: SEM image fibre A1

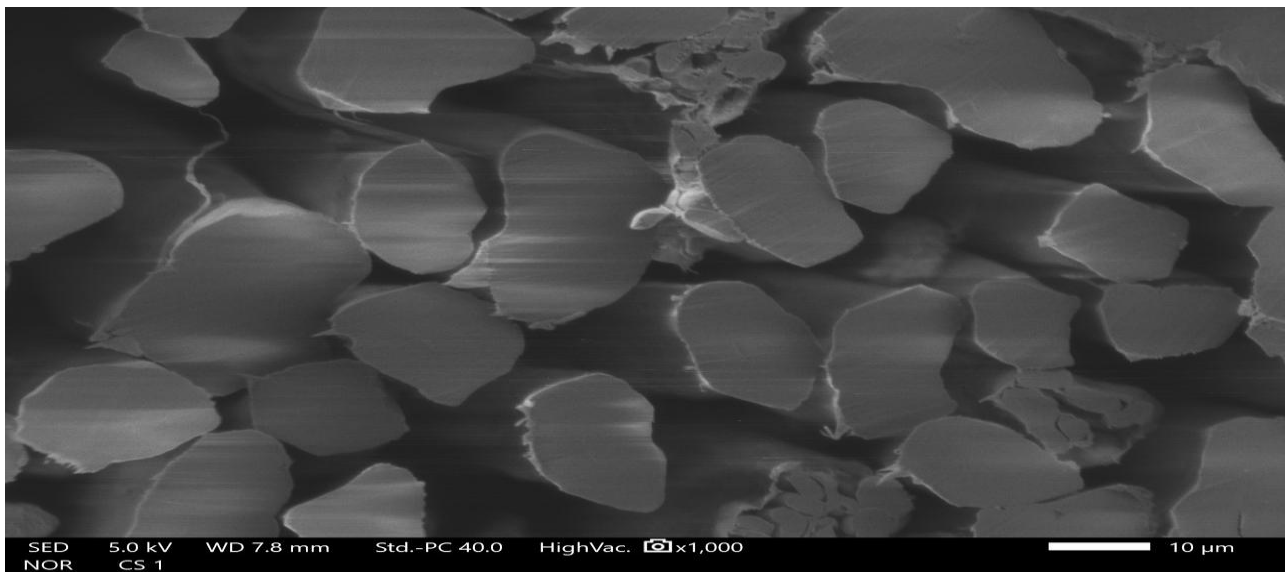


Figure 4: Cross sectional View for the fibre A1

Fibre code: A2

Microscopic examination of Obtained fibre: The obtained fibres A2 are further observed under Simple microscope and Scanning Electron microscope. Under microscope, Rod like structure of extracted fiber was observed.

Chemical composition of Fibre A2: After extraction of fibre A2, Chemical composition such as Cellulose and hemi-cellulose content, Lignin and pectin content as well as amount of oil, wax and ash was determined. It was observed that, the fibre A2 comprises more cellulose content as compared to Sisal, ramie, jute flax, hemp, pineapple, abaca and abaca fibre. And cellulose content and moisture regain (%) of fibre A2 are somewhat similar to that of cotton fibre. (Table 1)

Chemical composition	Fibre A2
Cellulose	81 to 85 %
Hemi cellulose	11.9 %
Lignin	5.3 %
Pectin	2.3 %
Oil and Wax	3.19 %
Ash	1.2 %

Table 1: Chemical composition of Fibre A2

Physical properties of Fibre A2

Further, the physical properties such as color, length, diameter, moisture regain, elongation break, content, density etc were determined. White coloured shiny and soft fibre was obtained with a length of about 5mm (min) to 40 mm (max). The strength of the obtained fibre is similar to that of wool, bamboo and coconut fibre whereas the density of the fibre is high as compared to other fibres.

Physical properties	fibre A2
Colour	White
Length (mm)	5- 40
Diameter (μm)	14
Single fibre Strength (Mpa)	180
Elongation break (%)	4.3
Moisture regain (%)	7.5- 9
Moisture content (%)	6.9
Density (g/cc)	1.2

Table 2: Physical properties of fibre A2



Figure 1: Image Fibre A2

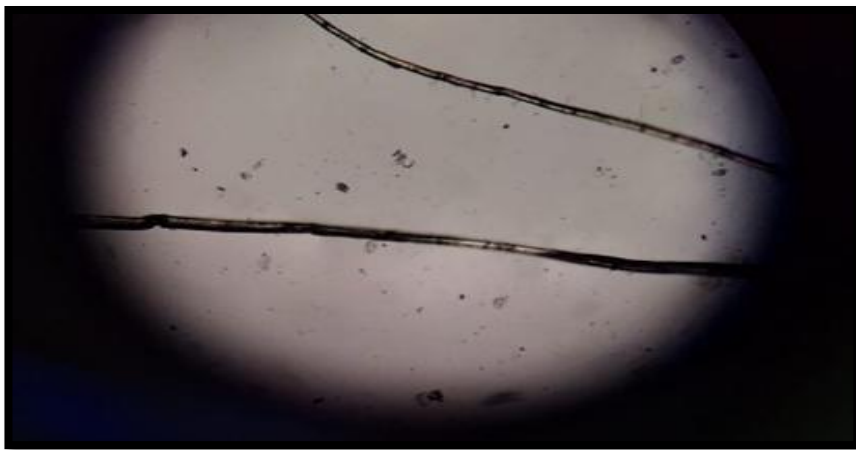


Figure 2: Microscope View for the fibre A2

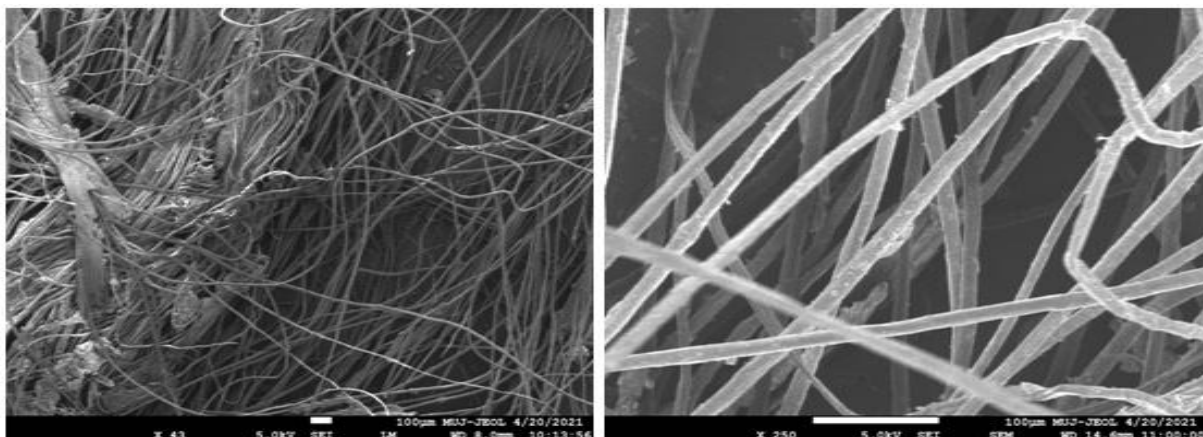


Figure 3: SEM image fibre A2

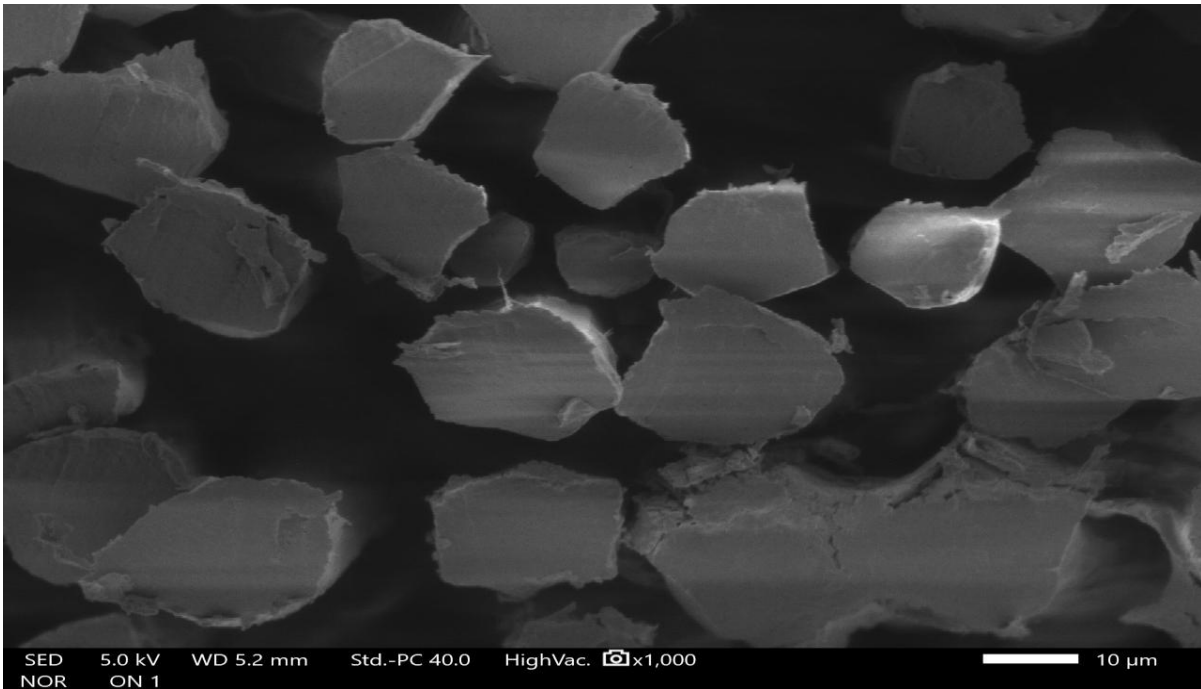


Figure 4: Cross sectional View for the fibre A2

Figure 1: Image for fibre A3



Microscopic examination of Obtained fibre: The extracted fibre A3 are further observed under simple microscope view in **Rod like shape** and Scanning Electron Microscope (SEM) it is observed cross section view in side that more hollow fibre structures

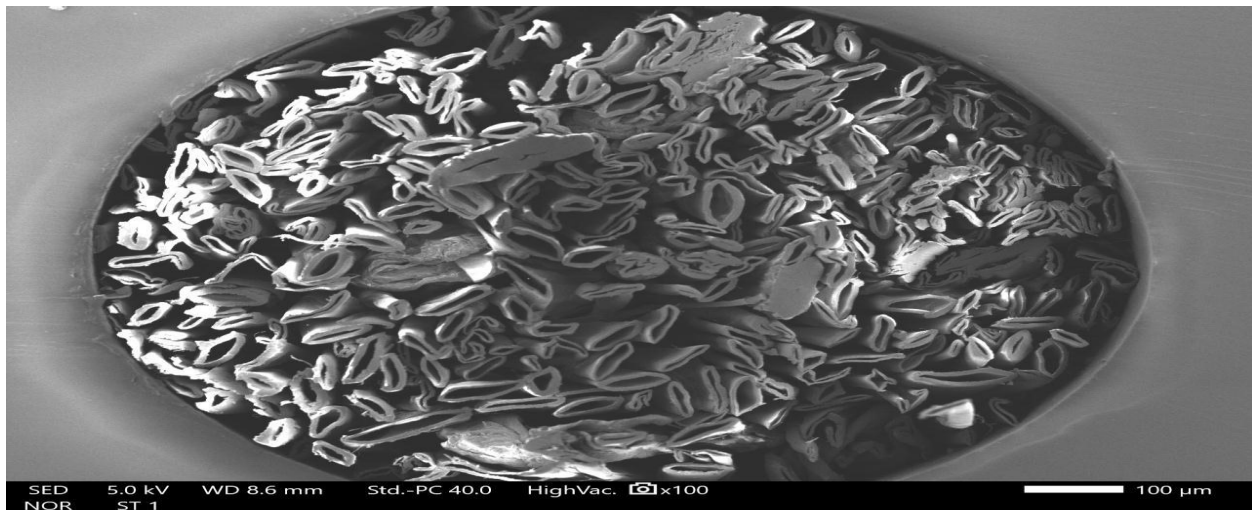


Figure 2: (a) Fiber A3 Hollow cross section view

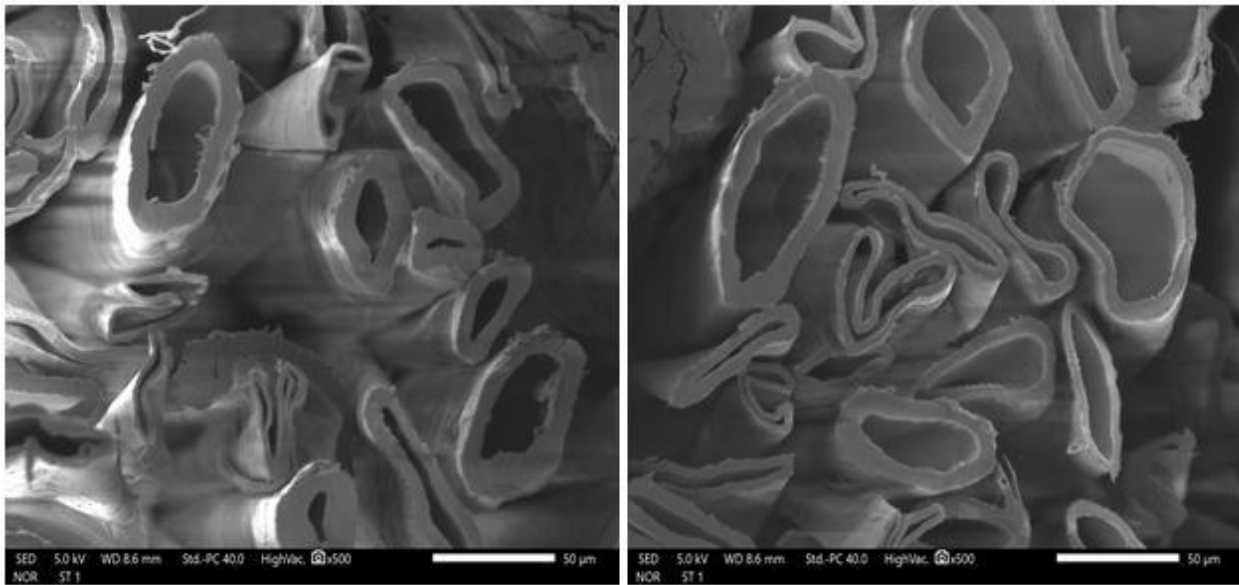


Figure 2: (b) Fiber A3 Hollow cross section view

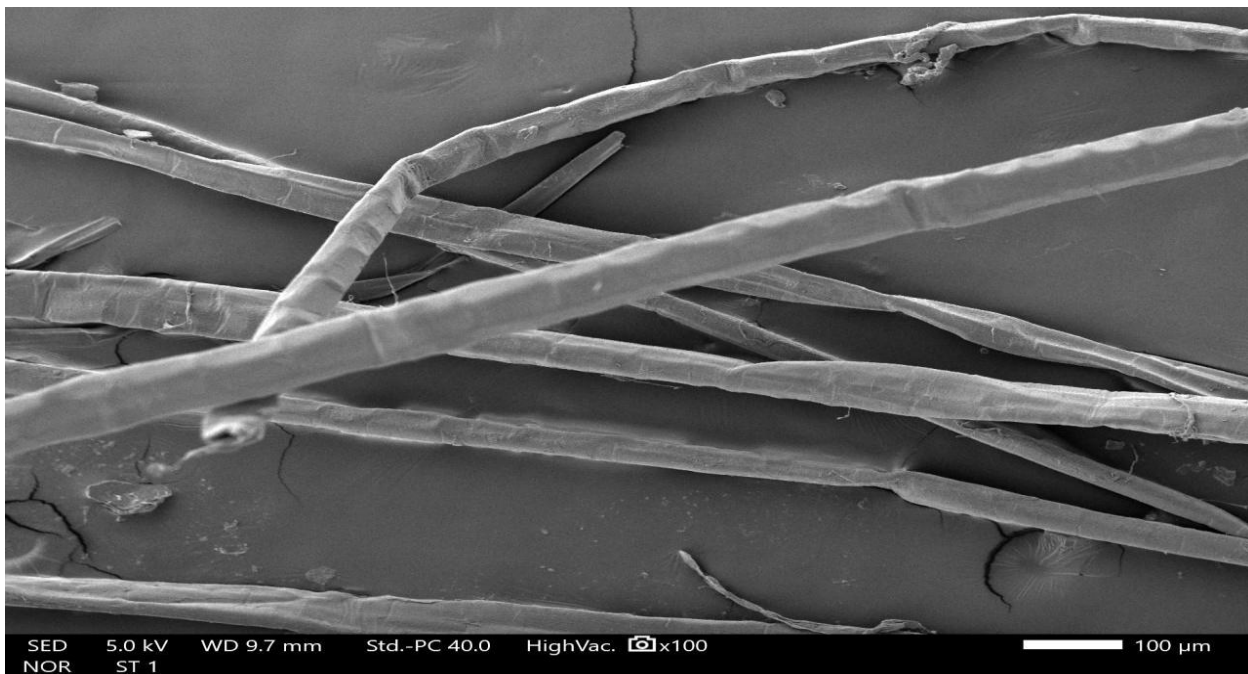


Figure 3: Fiber A3 Hollow longitudinal view

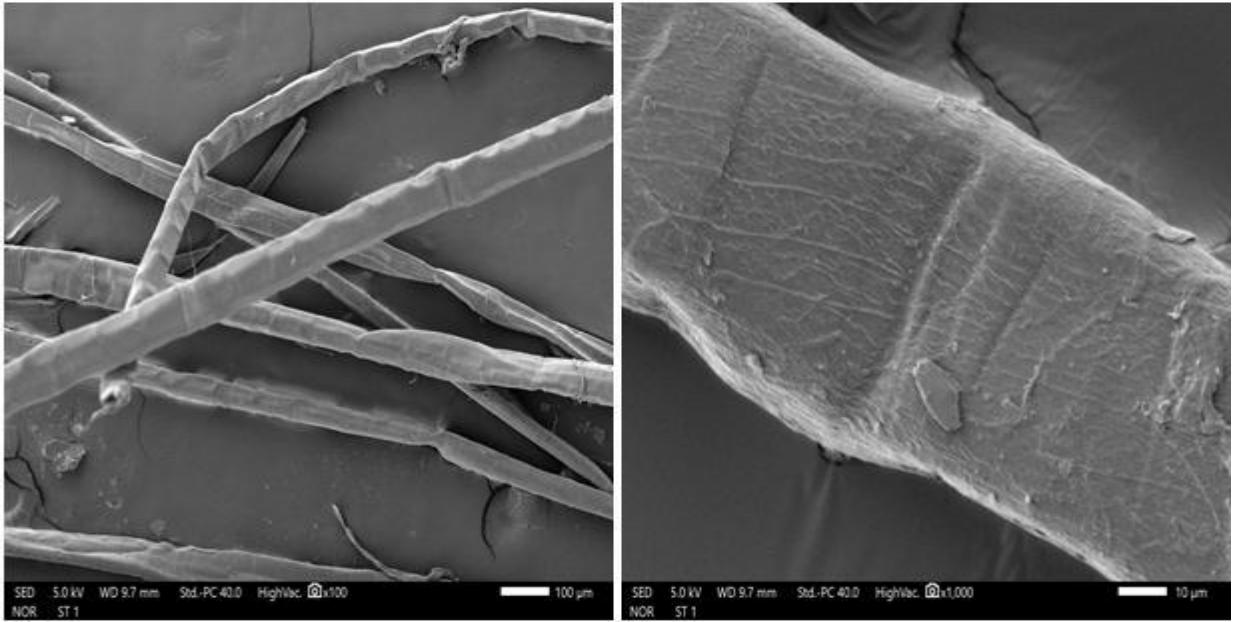


Figure 4: Fiber A3 Hollow longitudinal view

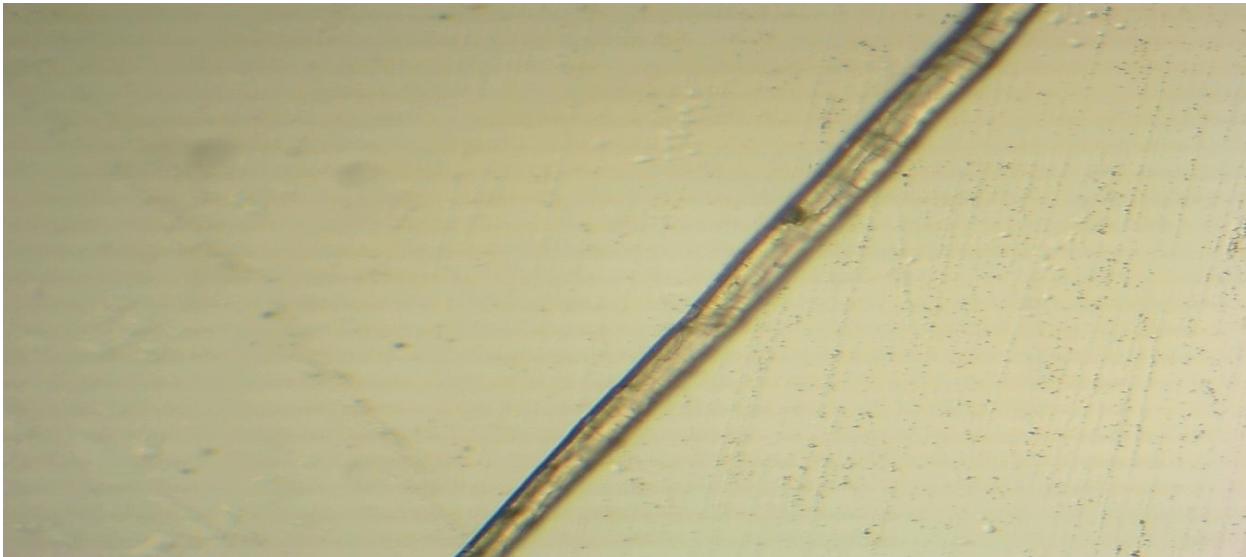


Figure 5: Microscopic view of Fiber A3

Chemical composition of Fibre A3: The fibre obtained from Fiber A3 was further analysed for chemical composition such as for determination of Cellulosic content, hemicellulosic content,

Lignin and pectin content and other oil, wax and ash content. It was observed that the cellulosic content of fibre A3 is more as compared to other fibres obtained from Coir and coconut fibre etc. The Jute, Pineapple and abaca fibre are equal cellulosic content to fibre A3. Moreover, the cellulosic content and moisture regain (%) of obtained fibre A3 is same as of Jute, Coir, and Coconut and Coconut and Pineapple fibre. (Table 1)

Table 1: Chemical composition (%) of Fiber A3

Chemical composition	Fibre A3
Cellulose	60-70 %
Hemi cellulose	16.4 %
Lignin	7 %
Pectin	6.2 %
Oil and Wax	1.48 %
Ash	7.3 %

Physical properties of Fiber A3

Further, the physical properties such as color, length, diameter, moisture regain, elongation break, content, density etc were determined. White creamy coloured shiny and soft fibres were obtained with a length of about 25 mm (min) to 70 mm (max). The fibre A3 density is low as compared to sisal, jute flax, ramie, abala, coir, and Pineapple and cotton fibres. And fibre density is equal A3 to Fibre A2, Fibre A1. The fibre A3 strength is very weak compared to other fibres (Table 4), but fibre A3 is very hollow fibre so that strength is very weak. This is hollow fibre more absorbency properties as compared to other and better comfort properties. The fibre A3 in future serious is very good because this is fibre used for Nonwoven sheet, Pads, diaper, Automobile filter media, medical sector and Polyester/ Fibre A3 blend make yarn.

Table 2: Physical properties of Fiber A3

Physical properties	Fiber A3
Colour	White Creamy shine
Length (mm)	25- 70
Diameter (μm)	21- 35
Single fibre Strength (Mpa)	0.54
Single fibre Strength (gf)	55.2
Elongation break (%)	1.8
Moisture regain (%)	11-13
Moisture content (%)	11.3
Density (g/cc)	1.2

Table 3: Comparative Analysis

S. No	Fiber	Cellulose	Hemi-cellulose	Lignin	Pectin	Wax and fat (%)	Moisture regain (%)	Density (g/cm^3)	Strength (Mpa)
1.	Hemp	73-77%	7-9%	4-6%	2.9%	0.9	12	0.83	450-690
2.	Jute	65%	22%	12.5%	1.5%	0.6	13.75	1.5	342- 670
3.	Ramie	68-76%	13-16%	0.6-0.7%	1.9%	0.3	8.0	1.50	348-750
4.	Coir	43.44%	0.25%	45.84%	3.0%	2.22	8-10.5	1.40	105-175
5.	Sisal	71.5	18.1	5.9	2.3	-	11	1.45	444-550
6.	Coconut	43	0.25	45.84	3	2.2	8- 12	1.18	131- 175
7.	Pineapple	55-68%	15-20%	8-12%	2-4%	4-7	10.8	1.5	Above 400
8.	Abaca	66.43%	24.7%	13.6%	0.3%	0.1	5.81	1.5	189
9.	Flax	75%	5%	4%	-	3	12	1.3-1.42	300-900

10.	Bambo o	70-74	12-14	10-12	2-3	2-3	12.7	1.1	130-230
11.	Fibre A1	82.4%	11.9%	5.3%	2.4%	1.1	7.5-9	1.2	141
12.	Wool	-	-	-	-	-	-	-	120-174
13.	Fibre A2	81%	11.9 %	5.3%	2.3%	3.1	7.5-9	1.2	180
14.	Fibre A3	66.1%	19.4%	7%	6.2%	1.4 8	11-13	1.2	0.54
15.	Cotton	80 -92%	-	-	0.4 %	0.6	7.5-8.5	1.54	264-560

10x

ATTENTION Innovative-Minded Feds!

Did you know that the General Services Administration runs its very own technology investment program that gets all of its project ideas from federal employees like you?

GSA's 10x program is accepting your ideas on how the government can use technology to improve its delivery of services.

ACT NOW! The deadline to submit an idea for this round of funding is 11:59pm **November 30th**.

Our Approach

Here's how it works:

- 1** Describe your idea in about 3 sentences (1,000 character max)
- 2** Submit through our website
- 3** If your idea is accepted, 10x will handle the rest

Next Steps

Submit your idea today! Visit 10x.gsa.gov for more details on our process, our investment themes, previous projects, and more.

What We're Looking For

10x accepts and considers all kinds of technology project ideas for Phase One funding. But we're particularly excited to receive ideas in a few select areas. Here's what we're after this time around:

- Ideas for how government can deliver equitable experiences for the public by focusing on improving digital services for the most vulnerable members of society; and
- Projects that reimagine ways to better understand and respond to the priorities and needs of the public.

Don't be afraid to submit your biggest, boldest, most ambitious ideas!

We call those *Moonshots*, and we're ready to shoot for the moon.



But Wait! There's More.

Want to submit an idea but don't know where to start? 10x can help. We offer free, facilitated workshops designed to help you and your colleagues generate innovative, submission-worthy ideas. Reach out to 10x@gsa.gov to learn more.

Email from Lisa Gonzalez (10/09/2023)

October 9, 2023

Memo: Recommendations for Leveraging USDA Procurement to Advance Equity

To: Members of the Equity Commission
Cecilia Hernandez, Federal Designated Officer, Equity Commission
Lionel Savage, Senior Advisor, Equity Commission

From: Members of the Federal Good Food Purchasing Coalition

Introduction

These comments, prepared by members of the [Federal Good Food Purchasing Coalition](#), provide recommendations for how USDA's procurement policies can advance the Biden-Harris administration's goals related to racial justice and equity, worker well-being, and inclusion.

The Federal Good Food Purchasing Coalition is working to spur a more just, healthy, resilient, and sustainable food system through values-aligned food purchasing and food service at the federal level. Our coalition is made up of many organizations, among them groups that represent millions of food workers, farmers, and eaters, and that focus on food systems issues ranging from farming and food production, labor, environmental health, public health, animal welfare, and local food systems. We are advocating for the federal government to leverage the power of federal food procurement to transform our food system. The coalition works to advance equity for food and farm workers, socially disadvantaged producers, communities impacted by our food system, and people who rely on federal food programs.

These comments offer a high-level discussion of equity in USDA procurement programs. We recommend reviewing [Procuring Food Justice](#), a recent report by two of our coalition's members – HEAL Food Alliance and Food Chain Workers Alliance – for a more comprehensive exploration of the equity and social justice dynamics of food procurement.

We commend the Equity Commission for your interim report and especially for the recognition that procurement is a critical lever to advance equity. In particular, we support your recommendations to create more equitable access to USDA procurement programs and agree that explicitly setting goals and policies to create stronger pathways for enrolling socially disadvantaged producers and minority-, women-, or veteran- owned food businesses into the USDA procurement system is a key strategy. We also appreciate recommendation 18f that speaks to the need for more transparency, including disclosures from both prime contractors and subcontractors, and the recommendation for the USDA to maintain a live database and provide an annual report on spending.

The procurement recommendations included in the Equity Commission's interim report represent a strong step toward increasing equity at USDA for socially disadvantaged producers,

but we believe that the Commission can go further by also focusing on equity for the food and farmworkers and equity for people who rely on USDA’s feeding programs including people who rely on food banks and school children.

Several existing Biden-Harris policies serve as a foundation for the food procurement-related recommendations to follow. The *Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* states explicitly that the federal government should leverage its own processes, including federal procurement, to advance racial equity. The *Executive Order on Protecting Worker Health and Safety* strives to ensure worker rights. Finally, the White House National Strategy on Hunger, Health and Nutrition aims to “empower all consumers to make and have access to healthy choices.”

According to a forthcoming analysis from our coalition, the USDA leads federal agencies in annual spending on food purchases with \$4.5 billion in spending during FY22. As the largest food purchaser in the federal government, the USDA has the opportunity and responsibility to ensure that its food purchasing advances, rather than undermines, the public good. In our comments to follow, we will make the case for improving USDA’s procurement in alignment with its objectives around equity and provide procurement-related recommendations for your consideration in the Equity Commission’s Final Report.

Equity Considerations in USDA Procurement

USDA’s current commodity procurement perpetuates a status quo food system that exacerbates inequity.

USDA’s current commodity procurement advantages the largest food companies at the expense of independent, sustainable, and Black, Indigenous, and other People of Color (BIPOC) farmers and ranchers. Friends of the Earth conducted an analysis of commodity purchases through the USDA Foods program and found that:

- From FY 2017- 2019, only fifteen companies received 60 percent of annual USDA Foods spending. Thirteen of these companies were meat and dairy companies. Tyson Foods alone, the biggest poultry producer in the United States and under scrutiny for its egregious treatment of workers,¹ accounted for 8 percent of all USDA Foods spending in FY 2019.
- Independent, sustainable, and BIPOC farmers and ranchers struggle to gain access to the program and compete with the subsidized USDA Foods prices.

¹ Friends of the Earth Analysis, data available upon request.

Members of congress are concerned about this issue as well. In a 2021 letter to the USDA led by Senator Booker and Representative McGovern, legislators made the case that the USDA Foods program needs a review to ensure more equity in purchasing. They state:

“Many school food service professionals are frustrated by the idea of serving food from companies that have committed human rights abuses, environmental harms and violations of federal laws... However, when school districts place their commodity purchasing orders with the USDA, they are not given a choice in which company will fill that order. The USDA Foods Program is thereby forcing these school districts to choose between leaving valuable entitlement dollars on the table or purchasing from USDA Foods, knowing that doing so will likely violate the commitment they have made to their communities to buy from producers who value local economies, environmental sustainability, valued workforce, animal welfare and nutrition. Meanwhile, independent farmers and ranchers who wish to sell to our schools, including those who are committed to the above values, are forced to compete against the heavily-subsidized products already available through the USDA Foods Program. In many cases, these independent producers are following ethical, environmental, and legal best practices.”²

USDA’s current commodity procurement supports companies with egregious labor violations.

In the last few months, much has been uncovered around the use of child labor at U.S. meatpacking plants. As reported by NBC, children as young as 13, primarily undocumented children from Central America, are working unfair hours and performing dangerous tasks at meat packing facilities.³ According to TB&P “children were working with hazardous chemicals and cleaning meat processing equipment including back saws, brisket saws and head splitters. Investigators learned at least three minors suffered injuries while working for the sanitation service provider.”⁴ Yet, there are no policies that USDA is enforcing to bring these vendors into compliance or to exclude them from its supply chains.

In an April 2023 letter to the meat and poultry industry, USDA Secretary Vilsack stated:

“The use of illegal child labor—particularly requiring that children undertake dangerous tasks—is inexcusable, and companies must consider both their legal and moral responsibilities to ensure they and their suppliers, subcontractors, and vendors fully

² C. Booker and R. McGovern, “Booker McGovern Urges USDA to Work with Local Farmers to Provide Nutritious Meals to School Districts.” The U.S. Senate, (2021). [booker_mcgovern_urges_usda_to_work_with_local_farmers_and_ranchers_to_help_provide_nutritious_meals_to_school_districts.pdf](#).

³ J. Ainsley and L. Strickler, “Feds expand probe into migrant child labor in slaughterhouses.” *NBC*. (2023, March 1), <https://www.nbcnews.com/politics/feds-expand-probe-migrant-child-labor-slaughterhouses-rcna72930>.

⁴ K. Souza, “Tyson Foods’ Green Forest plant implicated in child labor investigation”. *TB&P*, (2023, March 1), <https://talkbusiness.net/2023/03/tyson-foods-green-forest-plant-implicated-in-child-labor-investigation/>.

comply with child labor laws... For USDA, this means that we will use our procurement and regulatory authorities to provide the necessary attention and increased oversight to curb this recent trend as quickly as possible.”⁵

We appreciate Secretary Vilsack’s commitment to raising awareness of this issue and stating expectations for vendors. However, there are currently many USDA vendors holding multi-million dollar federal contracts that have been fined by the Department of Labor repeatedly for violating child labor laws, such as JBS, Tyson, and Cargill.⁶ In order to protect food workers and combat the child labor crisis, it is essential that the USDA holds vendors accountable by withholding contracting opportunities from companies with serious, willful, or repeated labor violations.

USDA’s commodity procurement supports meat- and dairy-heavy menus that exacerbate racial health disparities and fail to accommodate students and other program recipients who follow restricted or religious diets.

The USDA Foods Program is dominated by meat and dairy (68 percent of value and 45 percent of the volume), which translates to school menus that are dominated by meat and dairy products and that do not meet the needs of all students. A recent study of California school menus found that only 4 percent of entrees were plant-based, and half of those were nut butter and jelly, suggesting a misalignment with the *Dietary Guidelines for America* (DGA) recommendation to diversify protein intake.⁷ Leading public health organizations all encourage fiber-rich, plant-forward diets.⁸

There are massive disparities in rates of chronic diet-related diseases for BIPOC compared to white people, including for youth, making healthy and inclusive school menus a critical equity consideration.⁹ Additionally, the lack of plant-based, kosher, and halal options in the USDA Foods Programs make it challenging for school districts to accommodate students who follow restricted or religious diets. For example, students who follow plant-based or vegetarian diets have reported going hungry at school because there was not enough they could eat.¹⁰ BIPOC

⁵ USDA, (April 12, 2023), <https://www.usda.gov/sites/default/files/documents/usda-letter-combating-illegal-child-labor.pdf>.

⁶ D. Flynn, “Paid fines indicate meat industry’s use of child labor is more widespread than previously known,” Food Safety News, February 20, 2023, <https://www.foodsafetynews.com/2023/02/paid-fines-indicate-meat-industrys-use-of-child-labor-is-more-widespread-than-previously-known/>

⁷ K. Hamerschlag & J. Kraus-Polk, *The State of School Lunch in California*, Friends of the Earth, March 2021, p. 6. https://foe.org/wpcontent/uploads/2021/03/SchoolFoodReport_No-Execsummary.pdf

⁸ Friends of the Earth, *Public Health Consensus on Eating More Plant-based Foods and Less Meat*, 2021, <https://foe.org/wp-content/uploads/2021/03/Public-Health-Consensus-for-Reduced-Meat-Consumption-kh-final.pdf>

⁹ Centers for Disease Control and Prevention, “Prevalence of childhood obesity in the United States”, last modified May 17, 2022, <https://www.cdc.gov/obesity/data/childhood.html>

¹⁰ Healthy, Climate-Friendly School Food Campaign, “Support the Healthy Future Students & Earth Act—Full Version”, educational video, February 21, 2022, <https://www.youtube.com/watch?v=ui1jVKE6DzQ>

populations are three times as likely to follow a plant-based diet than white people,¹¹ and a 2020 Gallup poll revealed that 31 percent of BIPOC Americans reported reducing meat consumption in the last year compared to 19 percent of white Americans.¹² According to the National Institutes of Health, 95 percent of Asian Americans, 60-80 percent of African Americans, 80-100 percent of American Indians, and 50-80 percent of Hispanic people are unable to process lactose.¹³ Especially because BIPOC are also more likely to be food insecure – and therefore reliant on free and reduced-price school meals and food banks – it is imperative that our child nutrition and emergency feeding programs accommodate the dietary needs and preferences of BIPOC communities, which can be facilitated by USDA prioritizing procurement of plant-based sources of protein.¹⁴

USDA must also provide access to kosher and halal options for people who follow those diets. This will help ensure more Americans can benefit from USDA’s programs. Achieving nutrition security means ensuring that every American has access to healthy, culturally appropriate food that meets their individual needs, so accommodating religious diets is essential.

Recommendations

1) Increase transparency in USDA’s commodity procurement programs.

Transparency is foundational to all the following policy recommendations. USDA must collect from all its bidders and vendors and regularly publish the name and address of each supplier, distributor, processor, and producer involved in the provision of the products that the bidder will supply, information on vendor labor violations, and the number of contracts and spend with socially disadvantaged producers and women-, minority-, or veteran- owned businesses. This data must be available to the public. Right now, USDA is not tracking tier two suppliers, so it is not possible to ascertain how many of its purchases are supporting socially disadvantaged producers, only women-, minority-, or veteran-owned businesses.

2) Update the Agriculture Acquisition Regulation (AGAR) to disqualify vendors with serious labor violations.

USDA should finalize its proposed rule to update the Agriculture Acquisition Regulation (AGAR) to disqualify suppliers with egregious, willful, or repeated labor violations.¹⁵

¹¹ Z. Hrynowski, “What Percentage of Americans Are Vegetarian,” Gallup, September 27, 2019, <https://news.gallup.com/poll/267074/percentage-americansvegetarian.aspx>

¹² J. McCarthy, “Nearly One in Four in U.S. Have Cut Back on Eating Meat,” Gallup, January 27, 2020, <https://news.gallup.com/poll/282779/nearly-one-fourcut-back-eating-meat.aspx>

¹³ National Institutes of Health, Lactose Intolerance: Information for Health Care Providers (2006).

¹⁴ A. M. C. Myers & M. A. Painter, “Food Insecurity in the United States of America: An Examination of Race/Ethnicity and Nativity,” *Food Security* 9, no. 6, 2017: 1419–1432, <https://doi.org/10.1007/s12571-017-0733-8>

¹⁵ US Department of Agriculture, Federal Register, Proposed Rule 87 FR 9005, February 17, 2022, <https://www.federalregister.gov/documents/2022/02/17/2022-01751/agriculture-acquisition-regulation-agar>

3) Engage with the Interagency Task Force to Combat Child Labor Exploitation and review current USDA contracts

The Biden administration has prioritized an investigation into migrant child labor violations across the US, including within the food system and has created an interagency task force to take on this work.^{16,17} We recommend that the USDA continue to engage with this task force and together conduct a close examination of USDA's major contracts with food companies, to determine if USDA procurement practices are in line with federal goals related to worker rights, equity, and justice.

3) Shift from a least cost to a best value bidding process.

To center equity in USDA procurement, we recommend shifting away from a least cost bidding process and piloting a tradeoff process for a subset of commodities to select winning bids for food procurement contracts that deliver the overall best value using evaluation criteria developed with stakeholder engagement and a public comment, that includes consideration for equity and inclusion, for:

- a) Beginning or veteran farmers, fishermen, and ranchers;
- b) Socially disadvantaged farmers, fisherman, and ranchers;
- c) Small or mid-sized farms, ranches, or fishing businesses;
- d) People who follow religious or restricted diets;
- e) Indian tribes;
- f) Native Hawaiians;
- g) Native Alaskans;
- h) Diversified and resilient food supply chains;
- i) Worker well-being; and
- j) Climate justice, resilience, and mitigation practices.

4) Prioritize procurement of foods that support fair labor practices.

In addition to setting procurement goals that support socially disadvantaged producers and women-, minority-, and veteran- owned food businesses, the interim recommendations should make explicit that USDA should prioritize procurement of foods from companies that engage in fair labor practices, including foods that are:

¹⁶US Department of Labor, "Department of Labor, Interagency task force announce recent actions to combat exploitative child labor with new partnership, innovative tactics, ramped up enforcement," July 27, 2023, <https://www.dol.gov/newsroom/releases/osec/osec20230727#:~:text=The%20task%20force%20participants%20include%20the%20departments%20of,children%20that%20could%20be%20subject%20to%20child%20labor>

¹⁷ A. Seitz, "Biden Administration Announces Task Force to Combat Migrant Child Labor," *USA Today*, February 28, 2023, <https://www.usatoday.com/story/news/politics/2023/02/27/migrant-child-labor-biden-administration/11363375002/>.

- a) Produced or processed by a farm with employees who, as permitted by law, are represented by a collective bargaining agreement or memorandum of understanding;
- b) Produced or processed by a farm participating in a worker justice certification program;
- c) Sourced from vendors that have signed a labor peace agreement with a bona fide labor union; or
- d) Sourced from a vendor that is a worker-owned cooperative.

5) Establish a baseline and then set specific procurement spend or volume targets for procuring foods from socially disadvantaged producers, small- and mid-sized farms, organic farms, farms with third party animal welfare certifications, and farms using fair labor practices.

You cannot manage what you do not measure. It is important that the USDA publicly report on progress annually and, in keeping with recommendation (1), include a list of all its vendors and the name of each supplier, distributor, processor, and producer involved in the provision of the qualifying products to ensure transparent and verifiable measurement of progress towards targets.

Establishing and working toward a specific purchasing target will help USDA leverage its massive purchasing power to shift the commercial market toward more values-aligned food products. If USDA were to set a purchasing target for 5-10 years out that exceeds the commercial market supply, it would send a clear message to companies and producers that they could profitably shift production to meet USDA's long-term demand.

6) Provide technical assistance to help socially disadvantaged producers, organic farmers, and small or mid-sized family farms to participate in the Department's procurement programs.

This should include working with partner agencies, such as the Small Business Administration, to support these food and farm businesses in becoming certified as an 8(a) small business.

7) Pilot a competitive grant program to help beginning, veteran, or socially disadvantaged farmers, fishermen, and ranchers and small or mid-sized farms or fisheries that are structured as a family farm participate in the Department's procurement programs.

Grants should cover costs to make upgrades necessary to obtain food safety accreditations and audits required to become a vendor for the Department; to pay for the cost of a food safety accreditation and audit; to purchase liability insurance; and to develop and execute a food safety plan.

8) Establish a pilot program for school districts that provides an additional reimbursement for each meal component that meets equitable sourcing criteria.

USDA could use funds from the Commodity Credit Corporation to provide school districts with an additional 15 cent reimbursement¹⁸ for each meal component that meets equitable sourcing criteria, including foods that are:

- a) Produced by a socially disadvantaged producer;
- b) Produced by a small or mid-size family farm;
- c) Sourced from businesses or farms that engage in fair labor practices (as defined in recommendation #4);
- d) Organic or have another third-party environmental sustainability certification;
- e) Kosher, halal, or plant-based, and that qualify as a Meat/Meat Alternate;
- f) Sourced locally; or
- g) Third-party certified higher welfare animal products.

Most of these products cannot compete on price, especially compared with subsidized foods available through the USDA Foods Program. Providing an additional reimbursement for these values-aligned food products will create a fairer playing field for producers and small businesses and help school districts live by their values.

9) Expand minimally processed plant-based, halal, and kosher options in USDA’s procurement programs to ensure everyone has access to healthy, culturally appropriate food.

Several members of our coalition previously submitted [comments with detailed recommendations](#) for expanding these options in response to USDA’s request for public comments on “Barriers Facing Small Firms and Businesses Providing Halal, Kosher, and Organic Products in Commodity Contracting with the Agricultural Marketing Service” (AMS-CP-22-0014). We urge the Equity Commission to consider incorporating these recommendations into its final report.

Conclusion

We commend the Equity Commission for prioritizing procurement as a means to advance equity in our food system. Our recommendations are intended to build on the Commission’s recommendations in its interim report to advance equity for workers, people participating in USDA feeding programs, and BIPOC, small, independent, and sustainable producers. Our coalition, and our dozens of member organizations, stand ready to support you in your work to ensure equity throughout the food system.

¹⁸ This number is based on precedent set by state-level local school food incentive programs where additional reimbursement typically ranges from 5-20 cents per meal.

Email from Kayla Mattson (10/09/2023)

RESOLUTION SUPPORTING THE FARM SERVICE AGENCY FARMER-ELECTED COUNTY COMMITTEES AND AUTHORITIES

Whereas 16 U.S. Code § 590 and the 1935 Soil Conservation Act and most recently, CFR Title 7, Subtitle A, part 7 as amended February 2023, provides provisions for state, and county committee structure, composition, elections, and duties of the County Committee.

Whereas throughout the history of USDA, Farmer-Elected County Committees have represented their neighbors and farming communities by providing local knowledge and experience in understanding the trials and challenges farmers face.

Whereas the farmer-elected FSA County Committee has a long history of representation through democratic open nomination and election processes providing transparency and accountability of supervision of county office employees and the highest standards of customer service.

Whereas this time-tested system must be preserved, respected, and enhanced, both administratively and programmatically, to ensure continued accountability, equality and transparency are demonstrated in the administration and delivery of services and programs at the Farm Service Agency.

Be it *resolved* the NASCOE Board of Directors, in attendance at our 2023 National Convention in College Station on August 5, 2023, hereby reaffirms our unwavering support for the Farm Service Agency Farmer-Elected County Committee System, the current authorities provided by statute and regulation, and the National Association of Farmer-Elected Committees (NAFEC).

Be it *resolved* NASCOE respectfully disagrees with, and adamantly opposes, any initiative that diminishes, erodes, or removes any administrative, supervisory, or program delivery authorities historically and currently granted to Farmer-Elected County Committees. Specifically, the NASCOE **does not support** 1) removing the democratic local farmer-elected system and replacing with a bureaucratic appointment process; 2) removing or diminishing the Farmer-Elected County Committee authorities to hire, supervise, and evaluate performance for county executive directors and subordinate county office employees; 3) removing or diminishing any programmatic authorities for delivery of federal farm programs, and, 4) changing the employment system for any Title VII county office (CO) employees to the Title V General Schedule (GS) system.

Be it further *resolved* that a copy of this Resolution be spread upon the minutes of the 64th Annual Convention of NASCOE at College Station, Texas and forwarded to the NAFEC, the Honorable Secretary of Agriculture, the Honorable Administrator of FSA, the Honorable Chairperson of the Senate Committee on Agriculture, and the Honorable Chairperson of the House Committee on Agriculture.

EQUAL EMPLOYMENT OPPORTUNITY, DIVERSITY, EQUITY, AND INCLUSION

Dear USDA Equity Commission,

I hope this letter finds you well. I am writing to express my concerns regarding the Equal Employment Opportunity (EEO) and Diversity, Equity, and Inclusion (DEI) practices within our organization.

While I appreciate the efforts made by the organization to promote EEO and DEI, I believe there are areas that require further attention and improvement. It should not be our position to ignore, deny, or conceal from the public view or knowledge something that is embarrassing, unappealing, or damaging to one's reputation. We all are indeed public servants at the highest and lowest level. Our policies and customer service should be internal and external.

Background

On **June 2, 2022**, The Honorable Thomas J. Vilsack received a letter from US Senators Elizabeth Warren, Cory A. Booker, Raphael G. Warnock, and Bernard Sanders. I want to call to question the following. **"Under existing regulations and statutes, USDA has the authority to implement changes to address decades of discrimination. Existing law and regulations presently give a wide range of authorities that the Secretary may delegate to OASCR to ensure compliance with civil rights laws."**

On **February 27, 2023**, The USDA Equity Commission released a report to Honorable Thomas J Vilsack and specifically identified USDA's Need for Department-Wide Change. As a previous public servant of USDA RD, SFH, RUS Telecommunications, and the Office of Chief Risk Officer. On **February 28, 2023**, USDA responded to the 49-page report and provide one page related to USDA's Need for Department Change.

I regret to inform you that there is not accountability!

In fact, I tried to implement changes, and discuss serious issues within the workplace, that later were deemed relevant and statistically correct. However, on the highest level, Director (SES) and Director (GS15) pointed me towards the annual employee survey. Either intentionally or not, knowing that staff does not draft the narrative of said surveys.

I have spoken to several staff members that can and attest to maltreatment and hostile events continued within the workplace. My point is, Senior Leadership continues to focus on the public reputation, but the overall and overarching problem is the lack of genuineness within the workplace. In fact, we are making external reporting of the climate public as a priority rather than addressing the internal issues within the workplace.

Change needs to happen and it needs to happen now. See a list of internal policies that are out of date and do not reflect the impression that USDA is forward facing to the public. We are not going to address these issues by pretending they do not exist. We need to have the strength and dignity to admit the internal failure and stop making this a social norm.

EQUAL EMPLOYMENT OPPORTUNITY, DIVERSITY, EQUITY, AND INCLUSION

I understand that fostering a diverse and inclusive environment is a continuous process and requires the collective effort of all members of the organization. However, it is crucial that these efforts are led by those in positions of influence and authority.

Request

I request that the commission reviews USDA Directives and Instructions related to EEO and DEI. Identify what laws and regulations supersede guidance provided by the agency and make this list readily available to all staff within USDA. At which time, provide the public with the actual policies that are effective within USDA.

- EEO
- Time and Attendance
- Operational Internal Controls
- Reasonable Accommodations Process
- Parking
- Building Handicap Accessibility (the environment in the workplace has changed there are several closed doors)

Additionally, policies that are not inclusive to USDA that prevent the "pretext" issue within the workplace.

- Quality Assurance
- Internal Controls
- Upper Management Accountability
- Hiring Practices (SES) and Upper Management

Lastly, there is a way to clear up the excuse - we do not have appropriate staffing, provide statistical measures to validate and complete common size analysis of other companies that are operating efficiently with similar staffing levels. Ensure that the agency is accountable. Do not allow anymore unsubstantiated statements to influence the culture.

We are operating inefficiently and wasting taxpayer money! Take care of your employees and your employees will accomplish the mission! You cannot fix a problem without acknowledging that you have one!

If you need help or direction related to the means of collecting these data sources, please let me know! I kindly request your attention to these matters and look forward to any initiatives that will further strengthen our commitment to EEO and DEI.

Thank you for your time and consideration.

Angelica Royal

Concerned US Citizen, Disabled Vet, Parent, Daughter, Sister, and Friend.