



Farm Action



Farm Action Fund

A HEALTHY FOOD SYSTEM BEGINS WITH FARMERS:

Policy Recommendations to the MAHA Commission

June 2025

INTRODUCTION

The *Make Our Children Healthy Again: Assessment* (MAHA Report) marks a historic recognition of a crisis decades in the making: The American diet, shaped by a consolidated food system dominated by a handful of corporations, is fueling a chronic disease crisis. Crucially, it emphasizes that American farmers must be central to improving national health. We agree.

Across the country, farmers are already pioneering solutions like growing nutrient-dense crops, restoring soil health, raising animals on pasture, and building strong regional markets. The following document presents farmer-led policy recommendations that build on that leadership, offering a path forward that centers farmers as the drivers of a healthier future.

To do so, we must confront the current system in which the profits of foreign-owned conglomerates are routinely prioritized over the interests of American farmers and families. In sectors like meatpacking and seed, consolidation has empowered multinational corporations to shape the market—and often the rules themselves—in ways that maximize profits while suppressing independent producers and degrading the nutritional quality of our food.

As the MAHA Commission rightly notes, a healthy food system is essential to the health of our nation. That goal cannot be met without shifting power away from corporate middlemen and toward the people who grow nutritious food. Transforming the food system is a long-term effort, but meaningful progress is possible right now.

ABOUT FARM ACTION AND FARM ACTION FUND

Farm Action is a nonpartisan agricultural watchdog organization led by farmers. We advocate for accountability from both our government and large corporations within the agricultural sector. Farm Action Fund is a political nonprofit organization working to advance farmer-led reforms through legislative and regulatory action.



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REFORMING FARM PROGRAMS TO PROMOTE A HEALTHY FOOD SYSTEM

Federal farm programs are skewed toward a handful of commodity field crops at the expense of nutrient-dense specialty crops like fruits, vegetables, nuts, legumes, and whole grains. This imbalance has contributed to the very health crisis the Commission seeks to address. It also undermines food security and economic resilience by driving an agricultural trade deficit, as the U.S. grows increasingly reliant on imports for specialty crops.

For many farmers growing healthy, whole foods, existing farm programs fail to offer equal support. Regenerative, organic, and specialty crop farmers face limited access to crop insurance, conservation funding, and market development programs. In order to Make America Healthy Again, our farm safety net must reflect a more diverse and health-aligned agricultural vision.

POLICY RECOMMENDATIONS:

- **Shift Subsidies Toward Healthy Food Crops:** Increase general funding and program support for specialty crops—including fruits, vegetables, nuts, legumes, and whole grains—aligned with dietary guidelines.
 - **Increase funding for the U.S. Department of Agriculture's (USDA's) Specialty Crop Block Grant Program**, which provides support to state departments of agriculture to fund projects that enhance the competitiveness of specialty crops.
 - **Leverage USDA's Section 32 Program**, which allows the Secretary of Agriculture to support the farm sector through surplus removal and nutrition assistance, to strengthen markets for fresh, minimally processed specialty crops.
 - **Increase funding for USDA Agricultural Research Service (ARS) and National Institute of Food and Agriculture (NIFA)** to prioritize research focused on specialty crops.
- **Improve Risk Management Options for Diversified and Regenerative Farms:** Expand risk management options to provide better support for more diversified and regenerative farms that feed their communities.
 - **Reform the Whole Revenue Protection Program and the Non-Insured Disaster Assistance Program** to ensure a broader range of farmers have access to critical safety net tools. (See: [*Save Our Small Farms Act*](#))
 - **Ensure taxpayers' dollars are used efficiently** and are available to serve a broad range of farmers by capping crop insurance premium discounts, adjusting

the gross income means test, and reducing the subsidized guaranteed profit rate for private insurance companies. (See: [Assisting Family Farmers through Insurance Reform Measures Act](#))

- **Safeguard Domestic Specialty Crop Farmers** from unfair foreign competition by implementing targeted antidumping duties, similar to those recently reinstated on Mexican tomatoes.
- **Set Common-Sense Payment Limits:** Ensure that the largest, wealthiest farms are no longer receiving the bulk of taxpayer support by enforcing robust payment caps. (See: [Farm Program Integrity Act](#))
- **Support Healthy Food Access and Local Producers:** Expand programs like the Gus Schumacher Nutrition Incentive Program (GusNIP) that help low-income consumers afford fresh, healthy food while building markets for local farmers. (See: [GusNIP Improvement Act](#))
- **Reform the Environmental Quality Incentive Program (EQIP)** to ensure its resources are available for family farmers and ranchers who implement conservation practices. Recommended reforms include lowering the payment limit, reducing the cost-share of certain practices that are less effective in protecting public health from contaminants entering our food system, and eliminating the 50% set-aside for livestock producers, which primarily support large industrial operations. (See: [EQIP Improvement Act](#))



COMBATING CONSOLIDATION OF THE FOOD SYSTEM

The MAHA Report underscores how decades of consolidation and corporatization across the food system have coincided with the rise of ultra-processed foods (UPFs) and a dramatic increase in diet-related diseases. While American farmers have contributed to an abundant and affordable food supply, a growing share of the value created by farmers' work has been captured by a handful of dominant food manufacturers, processors, and retailers. This concentration of corporate power has not only weakened rural economies and limited market access for independent farmers—it has reshaped the American diet around government-subsidized, ultra-processed products that contribute to rising rates of obesity, diabetes, and other chronic illnesses.

Concentration levels surpass the threshold where market abuses are likely to occur in almost every food and agriculture sector. For instance, the top four firms control 80% of the U.S. corn seed market, 82% of the North American nitrogen fertilizer market, and 85% of the U.S. beef processing market.¹ Such dominance allows these corporations to dictate terms to farmers, often squeezing their margins and limiting their choices.

Addressing this crisis requires structural reforms that break the grip of corporate consolidation and rebuild a decentralized, health-focused food system that delivers fair returns to farmers and nourishing food to all communities.

POLICY RECOMMENDATIONS:

- **Support Local and Regional Food Systems:** Investing in local and regional food systems strengthens rural economies, shortens supply chains, and increases access to fresh, healthy food.
 - **Invest in regional food infrastructure** such as cold storage, processing, and distribution hubs by removing programmatic barriers for applicants and increasing infrastructural investments in the Local Agriculture Market Program (LAMP). (See: [*Local Farms and Food Act*](#))
 - **Shift government food procurement** to local and regional farmers. The administration can direct USDA and the Department of Defense to prioritize purchasing from local and regional farmers and processors by establishing targeted carve-outs and cooperative agreement programs that empower states

¹ Farm Action, July 2024. Agriculture Consolidation Data Hub.
<https://farmaction.us/agriculture-consolidation-data-hub/>

to source institutionally from local producers. These actions would strengthen regional food systems, increase access to fresh, health-promoting foods, and support farm viability. Congress can complement this effort by strengthening “Buy American” provisions in the National School Lunch Program to ensure that U.S. taxpayer dollars support American-grown food. (See: [*American Food for American Schools Act*](#))

- **Support small-scale meat and poultry processors and farmers** by expanding access to federal resources and providing critical training and technical assistance to small processors, helping independent farmers and ranchers bring their products to market and compete in a consolidated meat industry. (See: [*Strengthening Local Processing Act*](#))
- **Restore Mandatory Country of Origin Labeling (COOL) for Beef and Pork:** Since 2015, beef and pork have been exempt from the country of origin labeling requirements that all other products in the marketplace must adhere to. This exemption—driven by the largest multinational meatpacking corporations and the World Trade Organization—denies consumers basic transparency and puts U.S. producers at a competitive disadvantage against unlabeled imports. Restoring COOL is a critical step toward a healthier food system, empowering consumers to make informed choices and strengthening food safety by improving supply chain accountability.
 - **Renegotiate the United States-Mexico-Canada Agreement** to reinstate mandatory COOL for all beef, pork, and meat products between the countries.
 - **Reinstate mandatory COOL** for beef and pork for all trade. (See: [*American Beef Labeling Act*](#))
- **Robustly Enforce Antitrust Laws:** Provide increased resources and clear directives to the Federal Trade Commission (FTC), Department of Justice (DOJ), and USDA to enforce existing laws and stop anti-competitive practices.
 - **Empower antitrust enforcers** to break up multinational meatpacking monopolies by establishing clear concentration thresholds and disincentivizing further concentration in the sector. (See: [*Strengthening Antitrust Enforcement for Meatpacking Act*](#))
 - **Strengthen antitrust laws** by providing federal enforcers with more resources, enhancing prohibitions on anticompetitive mergers and conduct, and implementing reforms to improve enforcement. (See: [*Competition and Antitrust Law Enforcement Reform Act*](#))
 - **Ban the largest and most anticompetitive mergers**, strengthen the DOJ and FTC’s ability to block harmful deals, and require consideration of worker impacts



to restore competition, reduce prices, and protect labor and small businesses.

(See: [Prohibiting Anticompetitive Mergers Act](#))

- **Strengthen the Packers and Stockyards Act (P&S Act):** Restore the P&S Act's original intent to protect livestock farmers and ranchers from unfair practices by dominant buyers.
 - **Advance rulemakings to strengthen livestock market fairness.** USDA should build on its recent efforts by finalizing rules that restore farmers' ability to bring P&S Act claims without proving industry-wide harm and by increasing transparency and price discovery in cattle markets to ensure fair competition.
 - **Reinstate the Grain Inspection, Packers and Stockyards Administration** as a stand-alone agency with full funding and enforcement authority of the P&S Act, or establish a dedicated office with equivalent powers, such as the Office of Special Investigator for Competition Matters within the USDA. (See: [Meat and Poultry Special Investigator Act](#))

REDUCING CHEMICAL USE IN AGRICULTURE

The MAHA Report raises concerns about how exposure to harmful substances in the food system, including through agriculture, may impact public health. While pesticides and other inputs are part of modern farming, we must chart a long-term path toward farming systems that reduce our reliance on these chemical tools. This transition can be economically beneficial for farmers.

Emerging evidence suggests that diversified, low-input systems such as organic, non-GMO, and regenerative can offer similar or greater productivity and profitability compared to conventional models.² For example, when we measure success not only in bushels per acre but in profit per acre, these systems often outperform their counterparts by reducing input costs and tapping into premium markets.³

Moreover, practices like cover cropping, rotational grazing, and composting help build long-term soil health, improve water retention, and increase farm resilience. With the right policy support, these models can form the backbone of a food system that enables farmers to be the drivers of improved health outcomes.

POLICY RECOMMENDATIONS:

- **Use Conservation Programs to Support Transition:** Federal conservation programs like EQIP and the Conservation Stewardship Program can play a pivotal role in reducing chemical exposure in the food system by supporting farmers who adopt soil-building practices and proven alternatives to pesticide-intensive agriculture. (See: [Agriculture Resilience Act](#))
 - **Incentivize proven soil health practices** by prioritizing conservation funding for practices like cover cropping, crop rotation, low-till, and compost application that strengthen soil structure, improve nutrient density in crops, and reduce the need for synthetic inputs.
 - **Support advanced grazing management** by expanding EQIP eligibility for managed rotational grazing, a practice that improves soil health, reduces runoff and erosion, and supports nutrient-dense, grassfed livestock production.

² Roseboro, Ken, December 2019. Non-GMO corn seed outperforming GM seed in field trials. <https://non-gmoreport.com/articles/non-gmo-corn-seed-outperforming-gm-seed-in-field-trials/>

³ Farm Action, October 2022. Enough About Bushels per Acre — Let's Focus on Profit per Acre. <https://farmaction.us/2022/10/12/enough-about-bushels-per-acre-lets-focus-on-profit-per-acre/>

- **Promote integrated pest management** strategies that reduce the need for pesticide applications while maintaining crop productivity and protecting pollinators and soil biology.
- **Enhance Technical Assistance and Research:** Farmers need practical, science-based tools and trusted guidance to adopt farming systems that reduce chemical use and improve public health. Yet many USDA programs remain underfunded or ill-equipped to support the transition to low-input systems like regenerative, organic, and advanced grazing operations.
 - **Boost public research investment in low-input farming systems** by increasing funding for USDA's ARS and NIFA to support studies on pest suppression, nutrient management, crop-livestock integration, and soil health in regenerative and organic systems. (See: [*Agriculture Resilience Act*](#))
 - **Fund farmer-driven innovation** by expanding the Sustainable Agriculture Research and Education program to support farmer-led trials and peer-to-peer technical assistance networks focused on reducing pesticide and synthetic input dependence.
 - **Fund research and outreach** through USDA's Grazing Land Conservation Initiative and pasture-focused Natural Resources Conservation Service programs to improve forage quality, animal health, and soil resilience in managed grazing systems.
- **Leverage Government Procurement:** Government food purchasing can be a powerful tool to create reliable, stable markets for farmers who use regenerative, organic, and grassfed practices. Directing procurement dollars toward these producers not only supports rural economies but ensures that food served in schools, hospitals, and other institutions is aligned with public health goals.
 - **Establish set-asides or carve-outs** within USDA procurement programs for sourcing from regenerative, organic, and grassfed producers, especially small and mid-sized farms.
 - **Expand cooperative agreement models**, such as those piloted during COVID-19 and through programs like the Local Food Purchase Assistance Cooperative Agreement Program and Local Food for Schools Cooperative Agreement Program, that allow states and local institutions to partner with farmers using low-input practices.
- **Transition Away From the Desiccant Use of Glyphosate:** Glyphosate is applied to crops, like wheat and oats, shortly before harvest to accelerate drying—a practice that increases residues on finished food products. To protect public health and support safer alternatives, Congress should direct USDA to support farmers in transitioning away

from this practice by investing in alternative harvest management strategies, funding agronomic research, and ultimately banning this practice. Additionally, the Food and Drug Administration should restore maximum residue levels for glyphosate on oats to the original level of 0.1 parts per million and regularly test commonly consumed items to ensure consumer safety. (See: [Keep Food Safe from Glyphosate Act](#))

- **Ensure Integrity in Upcoming Federal Pesticide Reviews:** With the Environmental Protection Agency set to release updated health assessments of common herbicides by 2026, the administration must safeguard the review process from corporate influence. These assessments should be grounded in independent, transparent science, and where risks to human health or the environment are identified, prompt and appropriate regulatory action must follow.

CONFRONTING CORPORATE CAPTURE AND THE REVOLVING DOOR

The MAHA Commission notes how powerful corporate interests have manipulated public policy to serve industry profits over public health. Nowhere is this clearer than in the way industry has captured federal agricultural programs meant to serve farmers and the public. Through policy influence, lobbying, and control over marketing boards, corporate actors have tilted the playing field to benefit industrial agriculture, often at the direct expense of the independent farmers and ranchers who produce our food.

A striking example is federal commodity checkoff programs, which require farmers to pay into pooled marketing funds intended to promote their products. In reality, these programs have been effectively captured by corporate-backed trade associations and processors, particularly in meatpacking and grain sectors, who steer these funds to advance their own agendas. The Modern Ag Alliance, a Bayer-founded coalition with nearly one-third of its 100+ member organizations funded by checkoff dollars, exemplifies how these organizations use farmers' checkoff funds to bolster their brands and influence policies to advance the corporate agenda. This group's vocal opposition to the MAHA Commission's report highlights how checkoff programs serve as tools to preserve and promote corporate interests—championing overproduction, chemical intensification, and monocropping systems. These priorities ultimately harm the very farmers that pay the checkoff fees by depressing farmgate prices and undermining independent farmers, while fueling the nation's worsening health crisis by accelerating the rise of ultra-processed foods and increasing chemical contamination of the American food system.

Adding to this problem, the revolving door between federal agencies and agribusiness allows industry insiders to write and enforce rules that serve narrow corporate interests rather than the public good. This ongoing personnel exchange erodes public trust and entrenches corporate dominance in agricultural policy.

Moreover, industry-backed efforts to block legal accountability, such as attempts to grant pesticide manufacturers immunity from health-related lawsuits, and to strip state and local governments of their authority to set agricultural and food standards further protect corporate profits at the expense of community values and democratic governance. Preemption efforts like the Ending Agricultural Trade Suppression Act threaten local innovation and the ability of states to tailor policies to protect public health.

These intertwined forms of corporate capture distort agricultural policy, suppress farmer autonomy, harm environmental and public health, and weaken democracy.

POLICY RECOMMENDATIONS:

- **Oppose Legal Immunity for Pesticide Manufacturers:** Reject any attempt to shield pesticide manufacturers from liability for health-related claims, such as those associated with glyphosate-based products like Roundup. These laws undermine the rights of farmers and consumers to seek justice and hold corporations accountable for harm caused by their products.
- **Protect Local Control Over Agricultural Policy:** Oppose any federal legislation—such as the EATS Act or its successors—that seeks to strip state and local governments of their authority to establish agricultural, food, or animal welfare standards within their borders. Such preemption efforts serve the interests of large-scale industrial agribusiness at the expense of community values, democratic governance, and local food economies. Preserving local control is essential for enabling innovation, protecting public health, and allowing states to tailor agricultural policies to meet the needs of their residents.
- **Reform Commodity Checkoff Programs:** Prohibit the use of checkoff funds by trade associations or entities that lobby on agricultural policy issues. Ensure that funds are controlled by farmers and used exclusively to promote transparent, competitive, and farmer-driven markets.
 - **USDA should halt all checkoff spending** until compliance audits are complete.
 - Prohibit checkoff programs with an annual assessment of \$20 million or more from **contracting with organizations that engage in political advocacy** on agricultural issues, with an exemption for institutions of higher education. (See: [*Opportunities for Fairness in Farming Act*](#))
 - Disallow all checkoff programs from **contracting with organizations that have conflicts of interest** or employ anticompetitive conduct. (See: [*Opportunities for Fairness in Farming Act*](#))
 - **Require programs** to increase transparency by publishing all budgets and disbursements and submitting to periodic audits by the USDA Inspector General. (See: [*Opportunities for Fairness in Farming Act*](#))
 - Require programs to **undergo periodic audits** by the Comptroller General of the United States. (See: [*Opportunities for Fairness in Farming Act*](#))
- **Shut the Revolving Door:** Implement a mandatory multi-year cooling-off period for individuals moving between positions in USDA or other food/agriculture-related agencies and the agribusiness firms they regulate. This will help insulate policy decisions from undue influence and realign the system to serve the public interest.



- **Break the Grip of Seed and Chemical Giants to Protect Public Health:** Just four corporations control over half the global seed market—and all of them also dominate the pesticide industry. These firms have used their market power to lock farmers into chemical-intensive production systems. Through restrictive contracts, limited access to non-GMO seed varieties, and other strategies, they have effectively eliminated farmer choice and forced widespread use of their proprietary seeds.
 - **Expand public plant breeding programs** focused on non-GMO, open-pollinated, and regionally-adapted seed varieties. Publicly funded seed research should result in publicly held patents or open-source germplasm—never proprietary control. (See: [Seeds and Breeds for the Future Act](#))
 - **Codify and expand USDA's Farmer Seed Liaison Office**, which helps independent seed developers and public breeders navigate the patent system, ensuring fairer access to seed markets.