

BUILDERS
VISION

SYSTEMS OF CONSEQUENCE

Building the Infrastructure for Food Systems Accountability
through Intervention Stacks

Accountability Accelerator

September 2026

Supported by Builders Vision

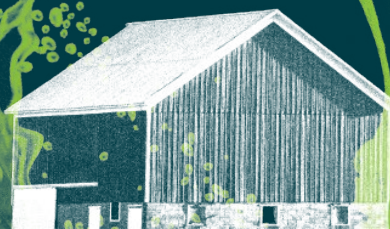


TABLE OF CONTENTS

TABLE OF CONTENTS	02
EXECUTIVE SUMMARY	04
INTRODUCTION	05
Project Overview & Methodology	05
Scope & Analytical Framework	06
The Architecture of Accountability	07
How to Read This Report	07
PART 1: ACCOUNTABILITY GAPS	08
1. Enforcement of existing laws and standards	08
1.1 The Regulatory & Legal Gap	08
1.2 Data Blindness vs. Technological Action	10
2. Financial actors are insufficiently integrating risks of unsustainable agriculture	11
2.1 Macro-Risk and the Reinsurance Blind Spot	11
2.2 The Local Lending & Insurance Domino Effect	12
3. Food production market structure creating incentives for industrial farm practices	13
3.1 The Farmer's Dilemma and Structural Lock-in	13
3.2 Macro-Market Failures & Policy Distortions	14
4. Practices vs. measurable outcomes and the greenwashing gap	15
4.1 The Greenwashing and Definitional Void	15
4.2 An Opaque Landscape and Attribution Failures	16
4.3 Fragmented MRV and Missing Pre-Competitive Infrastructure	17
4.4 Missing Connective Tissue: Markets, Communities, and Evidence	18
5. Challenging the narrative	19
5.1 Narrative Power and Public Understanding	19
5.2 A Civil Society Narrative Deficit	20
Emerging Findings	21

PART 2: ACCOUNTABILITY LEVERS	24
The Levers of Change: Six Accountability levers	25
Lever 1: Reform Policy & Legal Incentives	25
Lever 2: Strengthen Civil Society Oversight	26
Lever 3: Finance What Works	27
Lever 4: Standardize MRV	28
Lever 5: Lead Market Transformation	29
Lever 6: Change the Narrative	31
References	32
PART 3: INTERVENTION STACKING	33
Introduction: From Isolated Grants to Systemic Architecture	33
Stack 1: Narrative & Counter-Influence	34
Target State & Vision of Success	34
Activity Focus: Balancing Corporate Influence with Constituency	35
Stack 2: Institutional Market Pull	37
Target State & Vision of Success	37
Activity Focus: Public Procurement as a Regional Market Catalyst	38
Stack 3: Liability & Enforcement	40
Target State & Vision of Success	40
Activity Focus: Linking Environmental Harm to Liability	41
Stack 4: Local Credit & Insurance	43
Target State & Vision of Success	43
Activity Focus: Pricing Agronomic Resilience into Risk	43
Stack 5: Macro-Capital Stewardship	46
Target State & Vision of Success	46
Activity Focus: Mobilizing Universal Ownership to Address Systemic Risk	46
CONCLUSION	49

EXECUTIVE SUMMARY

This report takes stock of the accountability systems, institutions, incentives, and mechanisms that influence environmental and social outcomes across the food and agriculture sector in the Midwest.

Many of the environmental and social challenges facing food and agriculture today, including biodiversity loss, water pollution, soil degradation, greenhouse gas emissions, and negative impacts on farmers and communities, stem from a system in which environmental and social costs are not fully reflected in corporate and political decision making or market prices.

Although difficult to measure, True Cost Accounting efforts consistently suggest that the hidden environmental and health costs associated with industrial agriculture exceed the economic value the sector contributes to global GDP. Similar patterns are evident in the United States, where many of these costs remain weakly attributed, insufficiently disclosed, poorly enforced, or disconnected from meaningful consequences. As a result, harms can persist even when evidence exists, commitments have been made and viable solutions are available.

These challenges persist in part because the transition toward more regenerative, resilient, and equitable food systems is increasingly constrained by weaknesses in the accountability

infrastructure, by which we mean the systems, institutions, incentives, and mechanisms needed to make progress measurable, verifiable, financeable, enforceable, and trusted. Importantly, accountability extends both upstream and downstream of the farm gate. Farmers alone cannot be held responsible for harms that are also shaped by concentrated markets, buyer requirements, input dependency, crop insurance structures, and public policy choices.

Throughout the interviews conducted for this assessment, stakeholders repeatedly emphasized that progress is often constrained not only by technological, financial or policy barriers but by the absence of coherent systems for transparency, verification, risk pricing, remedy coordination, and oversight.

At the same time, governments, companies, investors, farmers, civil society organizations, and researchers are developing new approaches to improve environmental and social outcomes. However, many of these efforts face common challenges, including fragmented monitoring systems, inconsistent standards, limited traceability, weak consequence pathways, misaligned incentives,

and difficulties translating commitments into measurable outcomes at the landscape scale.

The Midwest is a particularly important context in which to understand these dynamics. As the primary engine of U.S. commodity production, the region plays a central role in shaping sourcing patterns, agricultural finance, supply chains, and environmental outcomes across the country.

Decisions made within this geography influence not only local landscapes and communities but also national markets, corporate practices, and public policy.

This report focuses on the accountability infrastructure needed to translate commitments into outcomes, evidence into action, and ambition into implementation. Through this process, the Accountability Accelerator also identified over 200 local implementing organizations which are part of this critical ecosystem. In the context of Midwest food and agriculture, accountability means ensuring that companies whose sourcing, financing, purchasing, lobbying, marketing, or operational practices influence land use, water quality, biodiversity, farmer livelihoods, and community health are expected to disclose, verify, reduce, remediate and bear responsibility for their impacts.

The objective of this assessment is therefore to take stock of the accountability infrastructure required to support credible pathways, identify where the gaps remain, recommend interventions, and explore opportunities for philanthropy and other actors to strengthen the systems that make progress measurable, enforceable, and scalable.

INTRODUCTION

Project Overview & Methodology

This report was commissioned by Builders Vision to take stock of the accountability systems, institutions, incentives, and mechanisms that influence environmental and social outcomes across the food and agriculture sector. The accountability challenge is to build the connective infrastructure that links evidence to responsibility, responsibility to incentives, and incentives to measurable improvements in land, freshwater, biodiversity, farmer resilience, and community health.

The objective is to explore where accountability is currently breaking down, where momentum is emerging, and where opportunities may exist to strengthen the systems that support credible transition pathways.

The framework is structured around key strategic intervention points, heavily informed by insights from 30 expert interviews aimed at identifying structural corporate accountability gaps regarding nature impacts, alongside a review of strategic regulatory mapping considerations, existing accountability frameworks, and findings from related initiatives, including previous Accountability Accelerator-supported work and a comprehensive analysis of potential pilot interventions.

COMPONENT	DESCRIPTION
Interviews	30 stakeholder interviews
Stakeholder categories	Civil society, researchers, practitioners, funders, standards organizations, and other accountability actors
Additional inputs	Literature review, accountability frameworks, Healthy Gulf findings, grantee feedback, and related research
Approach	Qualitative assessment, synthesis, and identification of recurring themes and areas of convergence

The assessment is intended to identify recurring patterns, accountability gaps, enabling conditions, and emerging opportunities. It does not seek to provide a comprehensive quantitative evaluation of the food and agriculture sector in the U.S. Midwest, nor does it attempt to capture every perspective within a highly diverse and rapidly evolving landscape. The assessment also did not examine land tenure, land access, or Indigenous Peoples' rights in depth. These issues remain important dimensions of food-system accountability and would warrant dedicated engagement and analysis in future work.

Although many of the accountability challenges identified have wider relevance, the findings and opportunities discussed in this assessment are grounded primarily in stakeholder perspectives and examples from the U.S. Midwest. Examples from other regions are included where they illustrate approaches that may be relevant or adaptable to the Midwest context.

A recurring theme throughout the interviews was that accountability failures in this geography rarely stem from a single missing mechanism. Weak enforcement may be reinforced by poor data, misaligned financial incentives, limited transparency, fragmented standards, or insufficient public awareness. As a result, this assessment does not view individual interventions as standalone solutions. Instead, it adopts a systems perspective in which different elements of accountability infrastructure interact and reinforce one another. This framing informs Part 3 of the report, which explores how portfolios of interventions—or “intervention stacks”—can work together to address multiple barriers simultaneously and create conditions for more durable and scalable change.

Scope & Analytical Framework

Throughout the interviews, stakeholders identified a wide range of factors shaping environmental and social outcomes across food and agriculture. These included both accountability infrastructure and broader enabling conditions. While both influence system performance, they play different roles in supporting a transition.

For the purposes of this assessment, accountability infrastructure refers to the systems, institutions, incentives, and mechanisms that make progress measurable, verifiable, enforceable, financeable, and trusted. Examples include monitoring and verification systems, traceability, disclosure frameworks, standards, consequence mechanisms, remedy pathways, transparency tools, and approaches to integrating environmental risk into financial decision-making.

Enabling conditions are the broader structural factors that shape how effectively accountability systems can operate. These include public policy, subsidies, insurance structures, market incentives, research and development, processing infrastructure, education, and other elements of the wider food system.

Both emerged repeatedly during interviews and both are important. However, this report focuses primarily on accountability infrastructure, while recognizing that accountability systems ultimately operate within a broader set of economic, political, and institutional conditions.

The Architecture of Accountability

The industrial food system currently relies on voluntary corporate commitments and unpriced externalities, shielded by carefully crafted narratives and opaque supply chains. The economic and ecological stakes of this status quo are immense. The global food system accounts for 30% of global emissions and current agricultural and consumption models generate staggering hidden costs estimated between \$12.7 trillion and \$19.8 trillion annually, primarily in health-related productivity losses and direct environmental degradation [2]. When contrasted with the global food industry's market value of roughly \$10 trillion, the current system destroys more economic value than it creates [2].

Correcting these structural market failures requires more than new technologies, practices, or commitments. It requires stronger accountability systems and direct feedback loops that make environmental and social impacts visible, measurable, attributable, and consequential. When companies, investors, policymakers, and consumers have access to credible and timely information (and when that information is linked to incentives, oversight, and remedy mechanisms), markets are better able to reward long-term value creation rather than the extraction of short-term gains at the expense of people and nature.

A more accountable food system would help align economic activity with environmental and social outcomes, reducing opportunities for rent-seeking behaviour, shifting capital toward more resilient production models, and creating stronger incentives to manage risks before they become costs borne by farmers, communities, taxpayers, and future generations. In this sense, accountability is not simply a mechanism for identifying harm; it is a foundational condition for enabling a more efficient, resilient, and economically productive food system.

How to Read This Report

This report is organized into three parts.

PART 1:

LANDSCAPE ASSESSMENT AND EMERGING GAPS

synthesizes insights from interviews and supporting research to identify the key accountability infrastructure gaps and enabling conditions shaping environmental and social outcomes across food and agriculture.

PART 2:

ACCOUNTABILITY LEVERS

explores potential pathways for strengthening accountability systems, drawing on examples, emerging initiatives, and ideas raised by interviewees.

PART 3:

INTERVENTION STACKS AND OPPORTUNITIES FOR ACTION

considers how individual interventions may reinforce one another and where coordinated action could create greater systemic impact.

PART 1

ACCOUNTABILITY GAPS

Across interviews, stakeholders consistently emphasised that many of the environmental and social challenges facing food and agriculture across the Midwest persist because accountability systems remain weak, fragmented, or incomplete. Accountability gaps were identified throughout the food system, affecting how impacts are measured, how risks are priced, how incentives are structured, how commitments are enforced, and how public understanding is shaped.

While the specific issues varied across geographies, commodities, and institutions, they clustered around five interconnected dimensions of accountability: Enforcement & Consequence, Finance & Risk, Market Structure & Incentives, Measurement & Verification, and Narrative & Legitimacy. Together, these dimensions help explain why environmental harms, social costs, and systemic risks can persist even when evidence exists, commitments are made, and alternative approaches are available.

The following sections synthesize the accountability gaps identified through interviews and supporting research, while also highlighting emerging examples of progress and innovation. Taken together, these findings provide a foundation for understanding where accountability is breaking down, where momentum is emerging, and where future interventions may have the greatest potential to strengthen the conditions for a credible transition.

I Enforcement of existing laws and standards

I.I Regulatory & Legal Gaps

Interviews consistently identified enforcement as one of the weakest links in the food system accountability chain. Existing environmental laws, regulations, and voluntary corporate commitments frequently lack the oversight, consequence mechanisms, and remedy pathways needed to prevent or address harm. Stakeholders pointed to weak enforcement capacity, regulatory loopholes, political constraints, and limited access to remediation for affected communities, all of which allow environmental and social impacts to persist even when legal requirements, corporate commitments, or scientific evidence exist.

KEY GAP	DESCRIPTION
Weak enforcement	Regulatory enforcement of agricultural pollution, nutrient runoff, pesticide use, and non-point source contamination remains weak and uneven.
Accountability without consequence	Sustainability disclosures and commitments frequently lack meaningful consequence mechanisms when ecological outcomes are not achieved.
Weak corporate response mechanisms	Companies often lack clear escalation, remedy, or corrective action pathways when environmental harms or accountability failures are identified.
Lack of remedy pathway	Communities and affected stakeholders often lack accessible mechanisms to trigger remediation, enforcement, or corporate response when harms occur.
Political constraints on enforcement	Existing enforcement tools and backstop regulations often remain politically constrained or weakly implemented.
Regulatory loopholes	Existing regulations contain loopholes that should be closed to prevent harm (e.g., poultry exemption from the Humane Methods of Slaughter Act).
Structural funding asymmetry	Financial incentives for ecological conservation are completely eclipsed by entrenched subsidy architectures that actively de-risk and capitalize the industrial, high-input farming model.
Systemic policy incoherence	The regulatory landscape suffers from deep fragmentation, where the vast majority of policy measures explicitly incentivize industrial agriculture, directly overriding and neutralizing peripheral efforts aimed at environmental mitigation.
FDA regulatory shortcomings	Approval processes like GRAS overlook cumulative pesticide applications, and Max Residue Levels are inappropriately based on adult diets rather than children.
Absence of 'Superfund' mechanisms	Lack of regulatory frameworks (akin to climate superfunds) that force multiple polluting companies to pay into funds for ecological cleanup or farmer climate impacts.
Underutilized mass litigation	Legal liability pathways for the full extent of externalities (similar to past tobacco litigation tactics) remain under-explored against industrial agriculture.
State-level enforcement failure	States frequently fail to enforce their own environmental laws, necessitating constant litigation by community advocacy groups to force compliance.

EVIDENCE OF MOMENTUM:

While enforcement gaps remain significant, stakeholders highlighted a growing number of examples demonstrating that stronger consequence mechanisms are possible. Consumer protection laws are increasingly being used to challenge misleading sustainability claims, legal networks are exploring new liability pathways for environmental and public health harms, and some certification systems have shown a willingness to impose meaningful consequences for non-compliance. Together, these efforts suggest a broader shift from accountability based primarily on voluntary commitments toward models grounded in verification, enforcement, and liability.

1.2 Data Blindness vs. Technological Action

Stakeholders consistently highlighted a growing gap between the availability of technologies capable of monitoring environmental impacts and the systems currently used to generate accountability. While advances in remote sensing, satellite monitoring, artificial intelligence, and spatial analytics have significantly expanded the ability to measure agricultural impacts at landscape scale, public data systems remain fragmented, underfunded, or incomplete. As a result, companies, regulators, communities, and local watchdog organizations often lack access to the information needed to identify harms, attribute responsibility, and support effective accountability mechanisms.

KEY GAP	DESCRIPTION
Defunded public data systems	Critical tracking mechanisms (like the NASS crop pesticide tracking) have been defunded, slimmed down, and delayed, creating a legislative data-translation gap. ¹
Underutilization of remote tech	Failure to utilize remote sensing, satellite, and AI technologies to build robust evidence bases for environmental law infringements (e.g., winter manure applications).
Local watchdog capacity deficit	Local environmental protection groups lack the fundamental governance, budgeting, and fundraising support necessary to survive and scale their accountability work.

EVIDENCE OF MOMENTUM:

Stakeholders highlighted a growing ecosystem of organizations demonstrating that many of the technical barriers to transparency and accountability are increasingly solvable. Advances in remote sensing, artificial intelligence, spatial analytics, and digital traceability are improving the ability to monitor environmental impacts, identify areas of risk, and track commodities through complex supply chains. At the same time, emerging examples suggest that robust monitoring and traceability systems can be implemented at far lower cost than is often assumed, challenging the perception that comprehensive accountability infrastructure is technically or economically infeasible.

¹ United States Department of Agriculture, National Agricultural Statistics Service (2026) Agricultural Chemical Use Program. Available at: [https://www.nass.usda.gov/Surveys/Guide to NASS Surveys/Chemical Use](https://www.nass.usda.gov/Surveys/Guide%20to%20NASS%20Surveys/Chemical%20Use)

2 Financial actors are insufficiently integrating risks of unsustainable agriculture

2.1 Macro-Risk and Reinsurance Blind Spots

Stakeholders consistently highlighted a disconnect between the environmental risks embedded within food systems and the way those risks are assessed by financial markets. This concern is reinforced by growing evidence that the estimated \$12 trillion environmental, social, and health costs associated with the global food system may exceed the sector’s direct economic value.² Despite mounting evidence that soil degradation, water stress, biodiversity loss, and other ecological pressures create material risks for agricultural production and long-term economic performance, these factors remain only partially integrated into investment decisions, lending practices, insurance models, and capital allocation frameworks.

The persistent underpricing of risk occurs despite clear, historical evidence of correlated financial losses driven by environmental shocks. For example, extreme Midwestern flooding in 2019 left 20 million acres unplanted, triggering a \$125 million earnings reduction for major agribusinesses, \$2.9 billion in lost sales for agrochemical providers, and \$4.5 billion in payouts for the federally backed crop insurance sector. Until these ecological dependencies are properly modeled as material financial risks on corporate balance sheets, capital deployment will continue to heavily favor extractive and highly vulnerable operational models.

KEY GAP	DESCRIPTION
Universal owner blind spots	Large investors fail to account for the holistic macroeconomic impacts of poor agricultural practices on other sectors, including labor productivity, remediation, and healthcare costs due to toxicity.
Reinsurance regulatory gaps	Lack of actuarial risk mandates forcing the reinsurance industry to price soil degradation and ecological risk into mainstream agricultural capital.
Banking nature-risk blindness	Banks and lenders lack robust data tools and frameworks to comprehensively map nature exposures and physical/transition risks across their agricultural portfolios.

² FAO. 2023. In Brief to The State of Food and Agriculture 2023. Revealing the true cost of food to transform agrifood systems. Rome. <https://doi.org/10.4060/cc7937en>

EVIDENCE OF MOMENTUM:

A growing ecosystem of organizations is working to integrate nature-related risks into mainstream financial decision-making. Investor coalitions such as IIGCC and Nature Action 100 are helping institutional investors understand and engage on physical and transition risks, while specialist organizations such as FAIRR are developing benchmarks, risk assessments, and decision-support tools that allow financial institutions to better evaluate agricultural exposure to ecological degradation. Together, these efforts are helping build the data, frameworks, and investor expectations needed to move nature-risk integration from a niche concern toward a mainstream financial practice.

2.2 Local Lending & Insurance Domino Effect

Stakeholders consistently identified local lending and insurance systems as important but often overlooked drivers of agricultural outcomes. Existing financial structures, including crop insurance programs and agricultural lending models, frequently reward conventional production systems while failing to recognize or value the risk-reduction benefits associated with ecological resilience. At the same time, lenders, insurers, and conservation actors often operate in separate silos, with limited access to the data, tools, and evidence needed to incorporate regenerative practices into underwriting, lending terms, and risk assessments. As a result, financial systems can inadvertently reinforce existing production models while limiting the support available for transition.

KEY GAP	DESCRIPTION
Insurance distortion	Crop insurance systems frequently reward conventional production systems while failing to value ecological resilience or diversification benefits.
Insufficient financial incentives	Financial systems currently provide insufficient long-term incentives, transition finance, and resilience-oriented lending structures for regenerative transition.
Lending term distortions	Conservation activities which improve farm income resilience are not effectively integrated into credit costs or lending terms.
Siloed conservation & financial knowledge	Conservationists and local lenders operate in silos, preventing the exchange of knowledge needed to embed conservation interventions directly into farm business cases and lending models.
Yield & conservation valuation data gap	Lack of accessible databases for local lenders to confidently assign monetary value and risk-reduction metrics to specific regenerative conservation practices.

EVIDENCE OF MOMENTUM:

Stakeholders highlighted a growing number of efforts to better align financial incentives with ecological resilience. Organizations such as Compeer Financial are exploring financial products that support regenerative transitions, while groups like the River Alliance of Wisconsin are advocating for lending practices that recognize watershed stewardship and long-term risk reduction. At the same time, organizations such as The Nature Conservancy are piloting mechanisms that connect corporate sustainability commitments with landscape-level outcomes and transition finance for farmers. Together, these initiatives demonstrate growing interest in linking ecological resilience, financial performance, and capital allocation more directly.

3 Food production market structure creating incentives for industrial farm practices

3.1 The Farmer’s Dilemma and Structural Lock-in

Stakeholders consistently described farmers as operating within a highly constrained economic and institutional environment. While food companies, biofuel producers, and other downstream actors increasingly set sustainability and regenerative agriculture targets, the costs, risks, and operational complexity of transition frequently remain with producers. Farmers often face a combination of limited transition finance, fragmented buyer requirements, concentrated infrastructure, input dependence, and insufficient technical support, creating structural barriers to diversification and resilience. Together, these dynamics can lock producers into existing production models even where alternative approaches may offer environmental, social, or long-term economic benefits.

KEY GAP	DESCRIPTION
Poor incentive alignment	Farmers often bear transition risks and costs while downstream corporations and supply chains capture much of the long-term financial value.
Grower lock-in	Farmers remain locked into existing production systems through debt structures, insurance programs, input dependence, and market concentration.
Weak transition infrastructure	Limited regional processing, aggregation, and distribution infrastructure constrains diversified and regenerative production systems.
Equipment monopolies	Lack of 'Right to Repair' legislation forces farmers into expensive machinery repair monopolies, financially straining operations and limiting independence.
Ag-chemical knowledge capture	Agro-chemical companies fund agricultural academies and provide free technical assistance, heavily biasing farmer knowledge and practices toward chemical reliance.
Farmer regulatory literacy gap	Farmers frequently lack the educational support to understand how current regulations, insurance models, and predatory lending systems negatively impact their financial viability.
Corporate upskilling avoidance	Downstream companies and the biofuel industry frequently fail to co-fund or support the critical capacity building and technical advising farmers need to transition.

EVIDENCE OF MOMENTUM:

Stakeholders highlighted a growing ecosystem of organizations working to reduce farmer dependence on conventional production systems by providing independent technical assistance, transition support, and alternative business models. Initiatives such as the Sustainable Food Lab’s Trusted Advisor Partnership are helping farmers access science-based advice outside traditional input supplier networks, while organizations such as Leading Harvest are supporting the implementation of regenerative practices at scale. At the same time, initiatives like Mercy for Animals’ Transformation Project are demonstrating viable transition pathways for producers seeking to move away from highly concentrated industrial production models. Together, these efforts suggest that grower lock-in can be overcome when farmers have access to appropriate technical, financial, and institutional support.

3.2 Macro-Market Failures & Policy Distortions

Stakeholders consistently emphasized that many of the incentives shaping agricultural production originate beyond the farm gate. Market concentration, subsidy structures, procurement systems, and public policy frameworks frequently reinforce high-input commodity production while providing limited recognition or reward for ecological resilience, diversification, or long-term stewardship. Interviewees repeatedly highlighted the influence of the Farm Bill, corporate concentration across the value chain, and lobbying efforts that can slow policy reform and maintain existing incentive structures. Together, these dynamics can weaken accountability, distort market signals, and make it difficult for more resilient production models to compete on a level playing field.

KEY GAP	DESCRIPTION
Policy distortion	Public policy frameworks, including elements of the Farm Bill and procurement systems, continue to reinforce industrial agricultural models.
Subsidy distortion	Existing subsidy systems often reward high-input commodity production rather than ecological resilience, diversification, or long-term stewardship.
Weak market incentives	Existing procurement systems, commodity markets, and pricing structures insufficiently reward ecological outcomes, diversification, or resilience.
Concentrated corporate power	Market concentration among input suppliers, processors, traders, and major buyers distorts bargaining power and limits accountability leverage.
Lobbying / political influence opacity	Corporate political activity, trade association lobbying, and anti-regulatory efforts frequently remain disconnected from public sustainability commitments.
Anti-trust enforcement failure	High levels of market concentration in the food sector have not been effectively addressed or curbed through anti-trust law implementation.
Macro- economic externalities	The political drive prioritizing efficiency over resilience creates societal externalities that manifest as inflationary pressures affecting monetary policy, the results of which are not integrated back into agriculture policy.
Outdated policy models	Industrial agriculture policy has not been updated with empirical evidence of viable alternatives that offer healthier farmer cost structures and natural capital accrual.
Unpriced pesticide externalities	Failure to utilize economic levers (like pesticide levies) to disincentivize overuse, despite evidence that reduced application does not negatively impact yields.

EVIDENCE OF MOMENTUM:

Stakeholders highlighted a growing ecosystem of organizations working to address the policy, market, and governance structures that shape agricultural outcomes. Groups such as the AGREE Coalition and Ceres are advancing reforms to crop insurance and conservation policy, while organizations including the Open Markets Institute, Farm Action, and the American Antitrust Institute are drawing attention to the accountability implications of market concentration across the food system. At the same time, investor-led stewardship initiatives are increasingly scrutinizing corporate lobbying activities and the alignment between public sustainability commitments and policy engagement. Together, these efforts demonstrate growing momentum to address the systemic incentives that influence production practices across the sector.

4 Practices vs. measurable outcomes and the greenwashing gap

4.I Greenwashing and a Definitional Void

Stakeholders consistently highlighted a disconnect between the widespread adoption of sustainability commitments and the ability to verify whether those commitments are delivering meaningful environmental outcomes. Existing accountability systems often focus on practice adoption, reporting, and certification rather than measurable ecological performance, while key concepts such as regenerative agriculture remain subject to inconsistent definitions and verification standards. This creates opportunities for inconsistent claims, weak comparability, and a growing gap between reported progress and demonstrated outcomes.

KEY GAP	DESCRIPTION
Definitional ambiguity	“Regenerative agriculture” lacks consistent definitions, verification standards, and agreed ecological thresholds across the landscape.
Certification without enforcement	Voluntary standards and certification systems frequently lack robust enforcement, consequence mechanisms, or independent verification.
Outcome gap	Sustainability systems emphasize commitments, disclosures, and practice adoption more than measurable ecological outcomes.

EVIDENCE OF MOMENTUM:

Stakeholders pointed to a growing ecosystem of organizations working to strengthen outcome-based accountability. Independent standard-setters, framework developers, and verification providers are increasingly seeking to establish clearer definitions, stronger ecological thresholds, and more rigorous verification systems for regenerative agriculture and related sustainability claims. Initiatives such as the Sustainable Agriculture Initiative’s Regenerating Together framework and emerging third-party verification approaches demonstrate growing momentum toward accountability systems that prioritize measurable outcomes rather than practice adoption alone. systemic incentives that influence production practices across the sector.

4.2 An Opaque Landscape and Attribution Failures

Stakeholders consistently highlighted challenges in tracing environmental impacts through complex agricultural supply chains and attributing responsibility for harms at the landscape level. Limited supply-chain visibility, fragmented spatial data, and weak attribution mechanisms often make it difficult for companies, investors, regulators, and communities to connect environmental outcomes with specific sourcing decisions, production practices, or actors. As a result, accountability systems frequently struggle to identify responsibility, assess exposure to risk, or establish meaningful consequence and remedy pathways.

KEY GAP	DESCRIPTION
Weak traceability	Complex supply chains and intermediated commodity systems limit visibility into sourcing conditions and environmental impacts.
Weak attribution systems	Existing monitoring systems struggle to attribute ecological outcomes to specific actors, interventions, or corporate commitments.
Opaque CAFO mapping	Absence of publicly available, comprehensive maps detailing the size and location of Concentrated Animal Feeding Operations (CAFOs).
Forensic attribution gaps	Underutilization of advanced scientific evidence building (e.g., antibiotic or E. coli DNA testing) to explicitly tie watershed contamination back to individual industrial facilities (like CAFOs).
Downstream supply chain risk blindness	Supermarkets and major retailers struggle to conduct deep-dive water risk assessments, remaining blind to physical variabilities that disrupt their supply chains.

EVIDENCE OF MOMENTUM:

Stakeholders highlighted a growing ecosystem of organizations working to improve traceability, due diligence, and attribution across complex supply chains. Initiatives such as the Global Dialogue on Seafood Traceability (GDST) have demonstrated that interoperable data standards can significantly improve transparency across fragmented global industries, while emerging traceability systems developed in response to regulations such as the EU Deforestation Regulation (EUDR) are proving that commodities can be linked back to specific places of production at scale. The OECD-FAO Guidance for Responsible Agriculture Supply Chains offers a solid basis for advancing best practice corporate action. Together, these efforts suggest that many of the technical barriers to traceability and attribution are increasingly solvable, creating new opportunities for stronger accountability throughout agricultural value chains.

³ See: https://www.oecd.org/en/publications/oecd-fao-guidance-for-responsible-agricultural-supply-chains_9789264251052-en.html

4.3 **Fragmented MRV and Missing Pre-Competitive Infrastructure**

Stakeholders consistently highlighted fragmentation across monitoring, reporting, and verification (MRV) systems as a major barrier to accountability. Producers, companies, investors, and regulators often rely on overlapping but poorly coordinated frameworks, creating reporting burdens while limiting comparability and interoperability. Interviewees also noted a lack of shared, pre-competitive infrastructure that would allow actors across value chains to collectively monitor impacts, align methodologies, and support landscape-scale accountability. As a result, many promising frameworks and standards—including the Science Based Targets Network (SBTN)—remain challenging to operationalize consistently without greater investment in shared data systems, collaboration mechanisms, and landscape-scale monitoring infrastructure.

KEY GAP	DESCRIPTION
Fragmented MRV	Multiple disconnected monitoring, reporting, and verification systems create duplication, weak comparability, and implementation fatigue.
Lack of internal capacity	Many companies willing to adopt Science Based Targets or integrate new assessment frameworks struggle with internal capacity and knowledge limitations.
Weak landscape-scale accountability	Accountability systems remain overly farm- or company-specific, with insufficient watershed- or landscape-level ecological accountability mechanisms.
Weak shared landscape MRV	Companies continue to conduct piecemeal monitoring rather than participating in shared landscape-level MRV systems.
Weak public transparency infrastructure	Limited public access to environmental performance data reduces accountability, comparability, and independent oversight capacity.
Weak integration of “North Star” frameworks	SBTN and TNFD provide important directional frameworks but remain difficult to operationalize consistently at company and landscape level.
Lack of pre-competitive space	There is a notable absence of pre-competitive spaces where farms and companies can safely convene to collaboratively work on systems-level solutions.

EVIDENCE OF MOMENTUM:

Stakeholders highlighted a growing number of initiatives designed to reduce fragmentation and build shared accountability infrastructure. Organizations such as NatureMetrics are developing centralized data platforms that can translate a single set of environmental observations into multiple reporting requirements, helping reduce duplication and reporting burdens across value chains. At the landscape scale, collaborative initiatives such as the Mississippi River Watershed Partnership (MRWP) are creating pre-competitive spaces for companies to coordinate investments, align methodologies, and support shared monitoring systems. Together, these models demonstrate how common infrastructure can improve interoperability, reduce implementation costs, and enable more effective landscape-scale accountability.

4.4 Missing Connective Tissue: Markets, Communities, and Evidence

Systemic transition is constrained by an absence of mechanisms linking responsible market actors to quantifiable ecological and public health outcomes. Current ecosystem service markets fail to establish financial connectivity between downstream beneficiaries (e.g., municipal water utilities) and upstream producers, preventing the financial incentivization of input reductions at the source. This gap is similarly evident in public health, where empirical research linking regenerative food quality (such as nutrient density in institutional catering) to improved health and academic outcomes remains significantly under-resourced. Without these institutional linkages, the burden of accountability defaults to civil society. However, independent monitoring organizations face severe capacity and funding deficits, operate in uncoordinated silos, and community-led evidence gathering frequently lacks the institutional protection necessary to operate safely and effectively.

KEY GAP	DESCRIPTION
Disconnected communities	Community monitoring systems and impacted populations are frequently disconnected from corporate accountability, enforcement, and remedy pathways.
Weak coalition coordination	NGOs, community groups, health advocates, labor groups, and environmental actors frequently operate in silos rather than coordinated accountability coalitions.
Risks to community monitors	Community evidence gathering remains unstructured and is often dangerous, e.g. monitors reporting receiving threats from farmers.
Civil society capacity deficit	The volume of issues, including complex political topics, far outweighs the current capacity of civil society organizations.
Public health evidence gap	Insufficient empirical research definitively linking food quality (e.g., regenerative procurement in school lunches) to improved public health and academic outcomes.
Disconnected ecosystem service markets	Failure to link downstream beneficiaries (e.g., water utilities) to upstream producers (farmers) to financially reward input reductions at the source.
Procurement translation gap	Institutional purchasers struggle to translate high-level sustainability values into binding purchasing policies, contract terms, and supplier transition plans.
Unquantified relocalisation benefits	A lack of robust economic modeling required to mathematically demonstrate the localized financial benefits of scaling regenerative public procurement.

EVIDENCE OF MOMENTUM:

Stakeholders highlighted a growing number of initiatives designed to connect environmental outcomes, public benefits, and economic incentives more directly. Programs such as Good Food Purchasing are helping translate sustainability objectives into procurement decisions by aligning public institutions, communities, and suppliers around shared outcomes. At the same time, organizations such as Edacious are developing tools to measure nutrient density and strengthen the evidence linking agricultural practices to public health outcomes, while platforms such as LandScale are improving the ability to assess sustainability performance at landscape and jurisdictional scales. Together, these efforts demonstrate how stronger connections between markets, communities, and evidence systems can help turn environmental and social outcomes into actionable decision-making criteria.

5 Challenging the narrative

5.1 Narrative Power and Public Understanding

Stakeholders highlighted significant asymmetries in the resources, influence, and visibility available to different actors seeking to shape food system narratives. While many food system challenges involve legitimate scientific, economic, and political debates, interviewees noted that public understanding, policy priorities, and market signals can be influenced by actors with strong incentives to maintain existing production and consumption models. Concerns were also raised regarding the transparency of corporate lobbying and advocacy activities, the alignment between public sustainability commitments and policy engagement, and the growing politicization of environmental, social, and governance (ESG) issues. Together, these dynamics can make it more difficult to build shared understanding, strengthen accountability mechanisms, and advance broadly supported transition pathways.

KEY GAP	DESCRIPTION
Narrative distortion	Dominant narratives around efficiency, productivity, and “feeding the world” often obscure ecological externalities and systemic accountability failures.
ESG politicization	Political polarization and anti-ESG dynamics constrain accountability efforts and corporate engagement strategies.
Divisive polarization	The backlash against ESG has harmed progress on building a common, less divisive narrative that could be embraced by the political right and rural farming communities.
Consumption policy blind spots	Laws and policies shaping consumption patterns (such as school food procurement and food availability promotion) fail to align with ecological or nutritional accountability.
PR and advertising impunity	Absence of campaigns or accountability mechanisms designed to raise reputational costs for the PR and creative agencies enabling agrifood greenwashing.
Lack of regulatory limits on UPF marketing	The absence of stringent regulatory interventions (similar to tobacco or alcohol) prohibiting the marketing of Ultra-Processed Foods (UPFs) to children and in schools.

EVIDENCE OF MOMENTUM:

Despite significant asymmetries in resources and influence across the food system, stakeholders highlighted a growing ecosystem of organizations working to strengthen transparency and public accountability. Investigative journalism outlets such as DeSmog, the Food and Environment Reporting Network (FERN), and The Examination are increasing scrutiny of corporate claims, lobbying activities, and environmental impacts, while academic initiatives such as the Climate and Social Science Network (CSSN) are helping map the role of industry influence in shaping policy debates. Interviewees noted that these efforts operate in a challenging environment; agribusiness interests spent a record \$178 million on U.S. federal lobbying in 2023⁴, and more than \$500 million influencing federal legislation between 2019 and 2023. Nevertheless, growing investment in investigative reporting, research, and rapid-response communications capacity suggests increasing momentum toward greater transparency and accountability in food system narratives.

⁴ Zimmerman S. (2024) Big Ag is spending big on lobbying and the 2024 election. Agriculture Dive, 24 October. Available at: Agriculture Dive <https://www.agriculturedive.com/news/agriculture-lobbying-2024-election-campaign-spending-farm-bill/730813/> (Accessed: 7 June 2026).

5.2 A Civil Society Narrative Deficit

Stakeholders highlighted challenges in building coordinated and compelling narratives around accountability and food system transition. Environmental, public health, labor, farmer, and community organizations often operate within separate networks, limiting opportunities for shared messaging and collective action. Interviewees also noted gaps in the evidence, communications, and engagement infrastructure needed to connect environmental outcomes with issues such as public health, economic resilience, and farmer livelihoods. As a result, accountability initiatives can struggle to build broad-based support across diverse stakeholder groups, particularly in rural and agricultural communities where transition risks and economic realities are a central concern.

KEY GAP	DESCRIPTION
Weak narrative infrastructure	Food-system accountability efforts remain fragmented and underinvested in coordinated narrative and public-engagement infrastructure.
Weak farmer transition narratives	Existing accountability narratives often insufficiently address farmer economics, viability, and transition risk realities.
Weak nutrition framing	Public discourse insufficiently connects regenerative agriculture, nutrition, food quality, and public health outcomes.
Weak legitimacy pathways	Accountability systems often struggle to build legitimacy with rural communities and politically moderate stakeholders.
Anti-disinformation rapid response	The ecosystem lacks coordinated, rapid-response communication capacity to intercept and delegitimize anti-environmental agrifood narratives and messengers in real-time.
Deficit of alternative cultural imaginaries	Underinvestment in cultural infrastructure and popular culture initiatives that help key publics envision alternative, sustainable models of the food system.
Nutrient density data gap	Absence of robust scientific metrics and consumer-facing labeling linking regenerative agricultural practices directly to increased nutrient density in food.
Investigative media gap	Insufficient resourcing for traditional media and dedicated investigative journalism explicitly exposing the political interference and negative externalities of agrifood majors.

EVIDENCE OF MOMENTUM:

Stakeholders highlighted a growing number of organizations working to strengthen the communications and engagement infrastructure surrounding food system accountability. Our team identified over 200 local NGOs and CSOs working in this field using a variety of accountability approaches (legal, data, finance, campaigns, etc.). Initiatives such as the Tilt Collective are helping connect environmental sustainability, nutrition, and public health through policy and procurement narratives, while organizations like the Food Disinfo Lab are developing tools and approaches to improve public understanding of food system issues.

Interviewees also pointed to efforts such as Invest in Our Land, which seeks to engage farmers and rural communities by addressing the economic realities, risks, and opportunities associated with transition. Interviewees also highlighted Inclusive Development International’s Follow the Money initiative as a strong NGO-led model for investigative research and accountability. Together, these initiatives reflect growing recognition that accountability efforts are most effective when they connect environmental outcomes with farmer livelihoods, community resilience, public health, and broader economic priorities.

Emerging Findings

Interviews identified a wide range of accountability gaps across the food and agriculture system. However, not all gaps are equally consequential or equally tractable. To help prioritize areas for action, the gaps identified in this assessment were evaluated according to two dimensions: (1) their potential impact on accountability outcomes across the food system, and (2) their readiness for action over the next three to five years, based on existing momentum, actors, tools, evidence, and institutional capacity. Scores are illustrative and intended to support discussion rather than provide a definitive ranking.

ACCOUNTABILITY INFRASTRUCTURE GAPS PRIORITIZATION MAP

Scored by Potential System Impact and Readiness for Action (Next 3–5 Years)

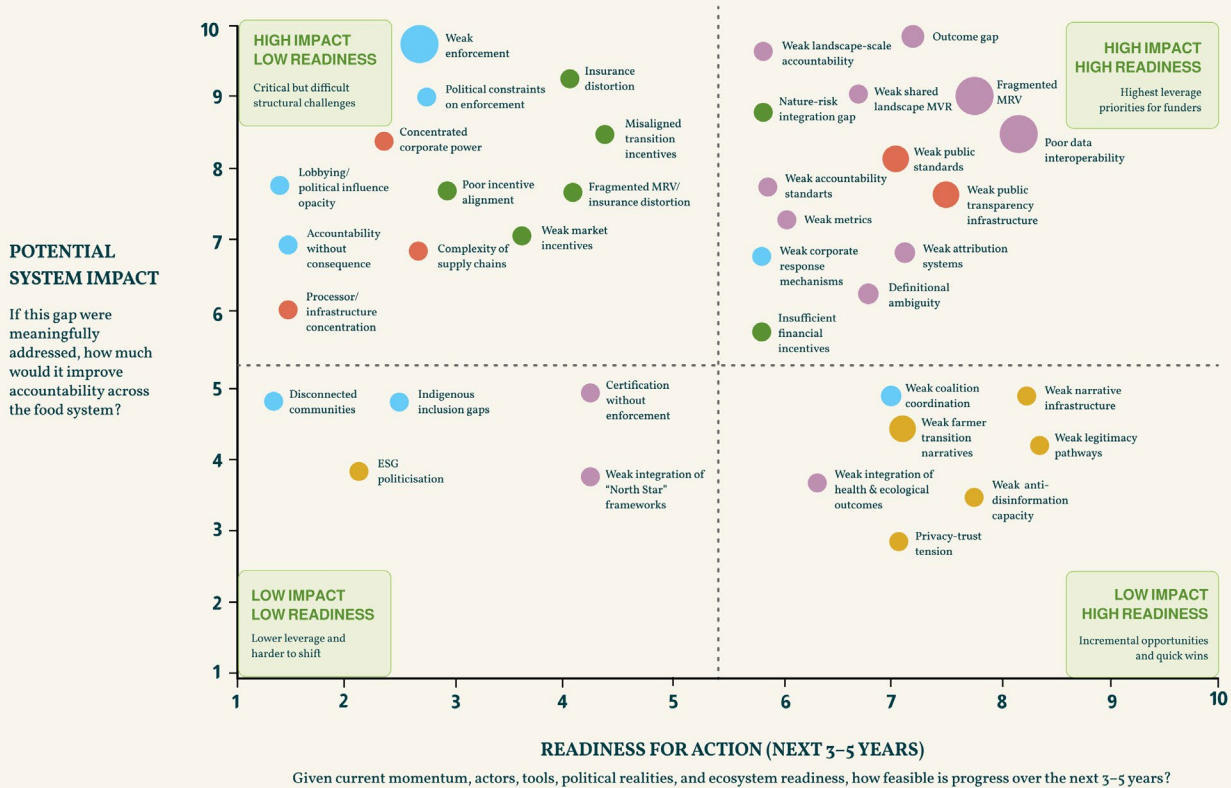


Figure 1: Prioritizing Accountability Gaps: Impact and Readiness for Action

Although stakeholders identified a wide range of accountability gaps, clear themes emerged across interviews and supporting research. These patterns point to a common conclusion: the challenge is often not a lack of innovation or ambition, but the absence of the systems, institutions, and incentives needed to translate them into measurable outcomes at scale.

- **The challenge is increasingly institutional rather than technological:**
Across interviews, stakeholders repeatedly emphasized that many of the technical capabilities required for stronger accountability already exist. Advances in remote sensing, traceability systems, spatial analytics, environmental monitoring, and data processing continue to expand rapidly. Yet implementation remains constrained by fragmented governance structures, inconsistent standards, weak interoperability, and insufficient investment in shared infrastructure. Across multiple dimensions of accountability, interviewees pointed less to a lack of innovation than to a lack of mechanisms capable of connecting existing tools into coherent systems.
- **Accountability systems remain better at measuring activity than outcomes:**
Many existing frameworks focus on commitments, certifications, disclosures, and practice adoption rather than measurable ecological and social outcomes. Stakeholders consistently described a gap between what is reported and what can be verified, attributed, and linked to real-world impacts. This challenge appears throughout the system, from sustainability claims and regenerative agriculture definitions to landscape-level monitoring and corporate reporting frameworks.
- **Corporate influence can weaken and delay accountability reform:**
Stakeholders highlighted the role of corporate lobbying, trade associations, political spending, and communications in shaping food and agricultural policy and public debate. Where these activities lack transparency or conflict with public sustainability commitments, they can weaken enforcement, slow policy reform, and reinforce existing market structures. Strengthening accountability therefore requires greater visibility of corporate political activity and clearer consequences where companies' influence strategies undermine their stated environmental and social commitments.
- **Environmental and social costs remain weakly connected to economic consequence:**
Across policy, finance, markets, and regulation, interviewees described a persistent disconnect between environmental impacts and economic decision-making. Existing systems frequently allow risks and externalities to remain unpriced, while financial incentives often continue to favor production models that generate long-term environmental and social costs. The result is a system in which resilience, stewardship, and long-term value creation are often undervalued relative to short-term productivity and scale.
- **Many accountability challenges emerge at the landscape scale:**
Stakeholders repeatedly highlighted a mismatch between the scale at which impacts occur and the scale at which accountability systems operate. Water quality, biodiversity loss, nutrient runoff, public health outcomes, and ecosystem resilience are experienced at watershed, regional, and landscape levels, yet accountability mechanisms remain largely organized around individual firms, facilities, and transactions. This disconnect creates persistent challenges for attribution, coordination, and collective action.

→ **Accountability depends on stronger connections between actors, incentives, and institutions:**

→ Perhaps the strongest cross-cutting theme was the absence of connective tissue linking different parts of the system. Stakeholders pointed to weak coordination between producers, buyers, lenders, insurers, regulators, researchers, communities, and civil society organizations. In many cases, the information required to improve outcomes already exists, but the institutions, incentives, and relationships needed to translate information into action remain underdeveloped. Strengthening accountability therefore requires not only better data and standards, but also stronger mechanisms for coordination, consequence, and collective problem solving.

Taken together, these findings suggest that the primary challenge is not the absence of solutions, but the absence of accountability infrastructure capable of translating information, incentives, and ambition into coordinated action. The following section explores six accountability levers that emerged repeatedly during interviews as potential pathways for strengthening that infrastructure.

PART 2

ACCOUNTABILITY LEVERS

This section introduces six accountability levers: broad routes through which funders and other actors can strengthen the accountability infrastructure underpinning food systems. The six levers respond directly to the gaps identified in Part 1, translating them into complementary pathways for strengthening accountability across policy, civil society, finance, data, markets, and public narratives.

While interviewed stakeholders held differing views on what the future food system should look like, there was strong agreement that stronger mechanisms are needed to improve transparency, verification, consequence, risk allocation, and coordination across the sector. Rather than prescribing particular production models, these interventions focus on building the accountability infrastructure needed to measure environmental and social impacts, clarify responsibility, align incentives, and enable better decision making across the system.

Each accountability lever represents a distinct pathway for influencing the incentives, information flows, accountability mechanisms, and decision-making that shape food systems. While each can drive meaningful change on its own, their greatest potential lies in how they reinforce one another.

The assessment suggests that accountability failures rarely stem from a single weakness. Instead, they arise from multiple interacting gaps, including poor data, weak standards, limited enforcement, mispriced risk, constrained civil society capacity, and fragmented public narratives. For that reason, the most promising opportunities are likely to come from combining interventions across these levers, allowing information, incentives, standards, and accountability mechanisms to work together to drive more systemic and durable change.



Each lever strengthens a distinct component of the accountability ecosystem. However, their greatest potential lies in combination. Together, they point towards a more systemic approach: designing intervention stacks that bring together legal, financial, data, market, and narrative tools to tackle specific accountability challenges. Part 3 then explores how these integrated approaches can create more durable, scalable, and lasting change.

The Levers of Change:

Six Accountability levers

Lever I Reform Policy & Legal Incentives

The environmental and social outcomes of agriculture are largely shaped by the policies, regulations, and market incentives that govern how the sector operates. Yet many existing legal and regulatory frameworks continue to shield industrial agriculture from meaningful environmental and public health accountability

Oversight remains heavily reliant on reactive enforcement and industry self-certification, from broad exemptions in animal welfare legislation (such as the poultry exemption under the Humane Methods of Slaughter Act) to fragmented approaches for assessing the cumulative impacts of agro-chemical mixtures. Strengthening accountability will require closing these loopholes with mandatory, independent public safety evaluations. At the same time, under-resourced environmental agencies increasingly struggle to enforce compliance, there is an opportunity to complement traditional regulation with more automated, data-driven oversight.

Even with stronger regulation, the broader economic landscape of agriculture remains shaped by a significant misalignment of public capital. Globally, the majority of the estimated \$611 billion spent on agricultural support continues to incentivise high-input commodity production. In the United States, billions of dollars in federal crop insurance subsidies disproportionately support monocultural systems, often outweighing investments in conservation [1, 3]. Realigning these incentives requires putting the principle of “public goods for public investment” into practice. Public support should increasingly be linked to verified environmental outcomes, such as improved water quality, healthier soils, and greater crop diversification, rather than historical production volumes [1, 3].

Policy and market reforms should also build on existing international accountability frameworks, including the OECD–FAO Guidance for Responsible Agricultural Supply Chains. This provides an established framework for companies to identify, prevent, mitigate, disclose, and, where appropriate, remedy adverse environmental and human rights impacts throughout their supply chains. Rather than creating entirely new expectations, there is an opportunity to strengthen implementation and embed these existing due diligence standards more consistently within regulatory frameworks, financial systems, procurement practices, and corporate governance.

Fiscal policy also has an important role to play in reflecting the environmental and public health costs that are currently excluded from market prices [2, 3]. Integrating True Cost Accounting (TCA) into policy design could include targeted levies on synthetic agricultural inputs and ultra-processed foods (UPFs), with resulting revenues helping to make whole, nutrient-dense foods more affordable [2, 3]. At the same time, policy reform should strengthen the wider economic foundations of rural communities. This includes supporting fair agricultural wages, expanding land-banking initiatives for independent producers, investing in decentralized regional processing infrastructure, and applying anti-trust

legislation where excessive market concentration undermines competition and resilience [1, 3]. Together, these reforms would strengthen legal accountability while helping ensure that the transition to more sustainable food systems remains economically viable for farmers and rural communities [3, 4].

EXAMPLE INTERVENTIONS



Retail Choice Architecture Regulation:

Apply statutory regulations to the physical design of grocery retail environments by restricting the placement, end-cap promotion, and visibility of ultra-processed foods (UPFs). Drawing on established public health approaches used for alcohol and tobacco, this intervention would reshape retail environments that currently encourage UPF consumption.



FTC Green Guides Petitions & Enforcement:

Support coordinated administrative law petitions urging the Federal Trade Commission (FTC) to establish clear, legally enforceable definitions for marketing claims such as “Regenerative,” “Carbon Neutral Beef,” and “Nature Positive” within the revised Green Guides. Codifying these standards would transform greenwashing from a voluntary reporting issue into a matter of deceptive marketing liability under federal law.



OECD–FAO Due Diligence Implementation:

Support initiatives that strengthen implementation of the OECD–FAO Guidance for Responsible Agricultural Supply Chains by helping governments, financial institutions, and companies embed robust environmental and human rights due diligence into agricultural supply chains. This could include developing practical implementation guidance, piloting due diligence approaches, strengthening disclosure and reporting, and building the capacity of regulators and companies to identify, prevent, mitigate, and transparently communicate environmental and human rights risks. By building on an internationally recognised framework, this intervention would help improve consistency, accountability, and responsible business conduct across global agricultural markets.

Lever 2 Strengthen Civil Society Oversight

Addressing the corporate “outcome gap” requires equipping independent watchdogs and civil society with the legal and forensic architecture necessary to enforce accountability [3]. Currently, agribusinesses frequently publish high-level climate targets to secure investor confidence while facing no material consequences for ongoing landscape-level degradation [5]. Because underfunded state oversight bodies frequently exhibit enforcement forbearance, civil society could be resourced to build unassailable, legally admissible evidence bases [3, 4]. By deploying advanced tracking methodologies—such as localized DNA watershed fingerprinting and satellite monitoring—-independent monitors can bypass corporate opacity, establishing direct attribution for environmental harms and creating a credible threat of civil accountability [3].

Simultaneously, leveraging existing state-level consumer protection acts and deceptive marketing laws provides a highly effective mechanism to penalize unsubstantiated “climate-smart” claims [5]. This approach forces corporate internalization of environmental costs without relying on the protracted passage of new federal

environmental legislation [2, 5]. To support these legal efforts, philanthropic capital could fund alternative public tracking architectures, effectively filling the data void left by under-resourced agencies [3]. By financing independent coalitions to build centralized, public databases of industrial pollution and corporate ownership structures, civil society can establish the baseline data required to mount successful administrative petitions and litigation [3, 4].

EXAMPLE INTERVENTIONS



Lobbying Transparency Initiatives:

Systematically mapping the lobbying activities and political expenditures of major food and agriculture companies, alongside their proxy industry associations. By making their objectives and operational methods public, this intelligence can be strategically shared with investigative journalists and institutional investor engagement groups (such as Nature Action 100) to expose conflicting corporate priorities.



UPF Regulatory Whitepaper (Tobacco/Alcohol Parity):

Funding a comprehensive, desk-research-driven regulatory toolkit detailing how tobacco- and alcohol-style interventions can be applied to ultra-processed foods (UPFs). This provides advocates with a rally-point blueprint for drafting legislation, such as the prohibition of UPF marketing to children and strict school-procurement bans [4].

Lever 3

Finance What Works

Realigning agricultural markets requires the financial sector to better recognise and price the risks associated with nature loss [2, 5]. Universal owners, asset managers, and reinsurance markets still struggle to integrate critical nature dependencies including topsoil depletion, aquifer collapse, and extreme weather related yield shocks into financial models and investment decisions [2, 9]. Strengthening accountability therefore requires better tools and data to translate physical climate risks, resource depletion and transition risks into corporate credit ratings, bond issuances, and equity valuations [5, 9]. Making these dependencies financially visible would allow investors and financial institutions to distinguish more effectively between extractive and resilient business models, creating stronger incentives for capital to move towards more sustainable supply chains.[2, 5].

At the producer level, there is a related challenge: Agricultural lenders often lack access to the conservation and environmental data needed to recognise the financial value of more resilient farming practices [3]. As a result, farmers transitioning towards regenerative or lower input systems can continue to face conventional, high-interest lending terms because improvements in soil health, water resilience, and other ecological factors are not reflected in assessments of financial risk [1, 3]. Building localized actuarial data that connects these ecological improvements with yield resilience and lower long-term default risk could enable commercial lenders to incorporate nature more effectively into underwriting decisions and potentially offer preferential financial terms [1, 5].

Financial institutions can also help address the short-term risks producers face during transition. Instruments such as parametric reinsurance and blended finance can help absorb or share the risk of short-term yield volatility during the multi-year transition away

from chemical-intensive models [6, 7]. Used alongside better data and risk assessment, these mechanisms could make it easier for producers to transition while creating stronger financial incentives for practices that improve long-term ecological and economic resilience.

Collectively, these interventions would help make environmental risk more visible within financial decision-making and ensure that capital allocation better reflects the long-term resilience of agricultural systems. By connecting ecological performance to financial risk, cost of capital, and access to finance, the financial system can become a more powerful accountability mechanism, rewarding more resilient practices while increasing the financial consequences of continued environmental degradation.

EXAMPLE INTERVENTIONS



Actuarial Conservation Databases for Local Lenders:

Support the development and deployment of robust agronomic databases (such as integrating government-held conservation practice datasets) that track the impact of regenerative agriculture on yield resilience [3]. These tools could give local commercial lenders the evidence needed to assign financial value to conservation practices, and integrate nature-risk directly into their loan underwriting processes [1, 5].



Commodity Concentration Exposure Profiles:

Develop targeted, public-facing financial profiles identifying major agrifood corporations with significant exposure to geographically concentrated climate and nature risks, for example, mapping major chocolate brands' dependence on cocoa production in drought exposed regions of West Africa could make otherwise hidden supply chain vulnerabilities more visible [5]. These metrics could provide powerful leverage for institutional investors engaging corporate boards on nature-related risk, resilience, and long-term business strategy [9].

Lever 4 Standardize MRV

Greater transparency across agrifood supply chains requires more consistent, interoperable systems for measuring, reporting and verifying environmental performance [5, 6]. Major downstream brands often still lack the data needed to trace and verify the ecological footprint of their primary agricultural inputs [5]. At the same time, fragmented reporting systems place a significant burden on producers, who may be required to provide similar information through multiple, often incompatible systems for different corporate buyers, without receiving either an aggregated picture of their own performance or a clear financial benefit [3, 6]. Developing open-source, standardized data infrastructure would allow environmental information to be collected once and used across multiple reporting and compliance requirements, reducing duplication while improving the consistency and accessibility of data across the supply chain [6, 8].

Better data also needs to be connected more directly to the physical commodities moving through supply chains [5]. Digital traceability systems, drawing on approaches already used in sectors such as global seafood, could enable verified environmental information to travel alongside commodities through transaction and shipment records [3]. This would make it

easier for companies, regulators, investors, and purchasers to understand where products come from and the environmental impacts associated with their production.

Crucially, stronger traceability needs to be accompanied by a shift from reporting primarily on practices and commitments towards measuring actual environmental outcomes [6]. Standardized, quantitative indicators, such as verified reductions in nutrient runoff over time or measured increases in soil organic carbon, would provide a more credible basis for assessing whether corporate and producer commitments are delivering meaningful change [5, 8]. Combining common metrics, interoperable data systems, and commodity-level traceability would make environmental performance more visible and comparable, while providing regulators, investors, companies, and civil society with stronger evidence for decision-making and accountability.

Collectively, these interventions would strengthen the information infrastructure that underpins accountability across the food system. Standardized MRV can help move the sector from fragmented and largely self-reported information towards more consistent, independently verifiable evidence of environmental performance. Importantly, this is not simply about generating more data, but ensuring that the right information is accessible, comparable, and connected to the decisions and accountability mechanisms that can drive change.

EXAMPLE INTERVENTIONS



CAFO Evidence Gathering and Spatial Mapping:

Support independent geospatial mapping to establish accurate, publicly accessible information on the size, location, and corporate ownership of Concentrated Animal Feeding Operations (CAFOs). State and federal agencies can lack centralized information on these facilities, creating significant gaps in environmental oversight. Bringing this spatial data into the public domain would provide a critical baseline for watershed monitoring, regulatory enforcement, civil society oversight, and other accountability efforts [3, 4].



Landscape-Level Collaborative Target Setting (SBTN):

Bring together major corporate off-takers within specific water catchment areas to collaboratively implement Science Based Targets (SBT) for Nature [8]. This pre-competitive approach would allow companies to share technical costs, align implementation and measurement approaches, and connect their combined efforts to verifiable ecological outcomes at the landscape scale [6, 8].

Lever 5

Lead Market Transformation

Scaling change across agricultural supply chains requires leading companies to move beyond individual commitments and help establish stronger, shared expectations across the market [6, 7]. In the absence of consistent industry-wide standards, concepts like “regenerative agriculture” can be interpreted very differently, allowing companies to make claims based on relatively limited changes in practices [3, 5]. Establishing credible, independent, outcome-based definitions is therefore important both for preventing greenwashing and for giving producers, companies, investors and consumers greater clarity about what meaningful progress looks like [5]. Establishment of third-party verified frameworks based on clear, science-based ecological thresholds could help create more consistent expectations across the value chain, and progressively raise the baseline for environmental performance across the sector [7, 8].

Common standards alone, however, will not overcome all of the barriers to implementation. Companies attempting to deliver landscape-level environmental targets independently can face significant financial, technical, and operational costs [6]. Pre-competitive collaboration offers a way to share some of these risks and make action at scale more feasible [6, 8]. Within high-risk agricultural regions or water basins, groups of companies could pool supply-chain data, aggregate demand for more sustainable production, and share the technical costs of implementation [8]. This would allow companies to address environmental challenges that cannot realistically be solved by any single buyer or supplier acting alone. Collective purchasing and sourcing arrangements could also help translate shared environmental expectations into stronger market signals. Aligning procurement requirements across multiple buyers would give producers greater certainty about demand, reduce the complexity of responding to different corporate standards, and lower barriers for companies seeking to move first [5, 7]. At the same time, greater consistency would make it easier to compare performance across companies and identify those that are failing to meet agreed expectations. In this way, pre-competitive collaboration can support collective action where it is needed while preserving competitive pressure for companies to improve their environmental performance.

Collectively, these interventions would help turn individual corporate leadership into broader market transformation. By combining credible standards, shared implementation infrastructure, aggregated demand, and greater transparency around performance, leading market actors can help raise expectations across entire supply chains. The opportunity is not simply to reward individual leaders, but to use their purchasing power and influence to shift the rules and incentives of the wider market.

EXAMPLE INTERVENTIONS



Regenerative Agriculture Shared Framework Roundtable:

Convene a multi-stakeholder roundtable, accompanied by a formal federal briefing, to develop a shared, credible, and economically viable framework for defining regenerative agriculture [3]. Bringing together producers, companies, policymakers, scientists, and civil society could help address current definitional ambiguity and better align corporate procurement standards with emerging policy and measurable environmental outcomes, creating a stronger foundation for scaling resilient farming practices [3, 7].



Supermarket Deep-Dive Water Risk Assessments:

Engage major grocery retailers in collaborative, detailed assessments of water-related risks across their supply chains [3]. Supermarkets are directly exposed to the consequences of localized drought, water scarcity, and watershed degradation, giving them a strong commercial incentive to address these risks. Their purchasing power and relationships with suppliers could make them valuable anchor partners for landscape-level water management and supplier resilience programmes [5, 6].

Lever 6 | Change the Narrative

Transforming food systems will require changing not only policies, financial incentives, and market practices, but also the narratives that shape public and political understanding of what change is possible and necessary. Public debate around agriculture and food security continues to be strongly influenced by well-resourced corporate communications that often equate greater production and industrial efficiency with food security [6,7]. This framing can obscure the environmental and public health costs associated with current production models and place responsibility primarily on individual consumer choices, rather than addressing the policies, subsidies, and market structures that shape those choices [2,4].

Civil society therefore needs stronger capacity to understand, challenge, and respond to misleading or unsupported narratives about food system transformation [3]. This could include well-resourced monitoring and rapid-response communications networks able to track emerging claims, scrutinize industry-funded research, and provide journalists, policymakers, and advocates with credible evidence and alternative perspectives. Building this infrastructure would allow civil society to respond more quickly and effectively when misinformation or misleading claims threaten to undermine public support for environmental and food system reform [3].

At the same time, there is an opportunity to build broader public support for change by connecting food system transformation more directly to issues that affect people's everyday lives [7]. Evidence linking industrial food models and ultra-processed foods (UPFs) to significant public health and economic costs can help broaden the conversation beyond climate and carbon alone [2,4]. Framing food system reform around health, affordability, resilience, rural livelihoods, and environmental quality could engage a wider and more politically diverse constituency, while making the benefits of transition more tangible.

Greater transparency around the actors shaping public and political debate is also an important part of narrative accountability [3]. Investigative journalism and public-interest research can help expose the lobbying expenditure, industry associations, communications strategies, and other networks used to influence food and agricultural policy. Making these relationships visible can help journalists, policymakers, investors, and the public better assess corporate claims and identify potential inconsistencies between companies' public sustainability commitments and their political or communications activities [5,6].

Collectively, these interventions would strengthen the information and narrative environment in which food system decisions are made. The aim is not simply to promote a different narrative, but to create the conditions for a more transparent and evidence-based public debate—one in which corporate claims can be scrutinized, vested interests are visible, and the environmental, health, social, and economic consequences of different food system pathways can be more clearly understood.

EXAMPLE INTERVENTIONS



Investigative Journalist Greenwashing Training:

Develop specialized training and resources for mainstream and investigative journalists to identify and critically assess corporate environmental claims within the food and agriculture sector [3]. Strengthening journalists' ability to interrogate sustainability claims, underlying evidence, and corporate practices could improve the quality of media coverage, counter misleading information, and bring greater attention to biodiversity, environmental accountability, and a just agricultural transition [4].



Public Polling for Political Leverage:

Support comprehensive public polling to better understand voter attitudes towards food, health, and environmental regulation and identify areas of broad public support [3]. Translating this evidence into accessible insights for advocates and policymakers could help demonstrate the political viability of reforms, including healthier food policies and stronger regulation of ultra-processed foods, and identify messages capable of resonating across different political and demographic groups [3,7].

References

- [1] River Alliance of Wisconsin, Wisconsin Agriculture Agenda.
- [2] Food System Economics Commission (FSEC), The Economics of the Food System Transformation (Global Policy Report).
- [3] Based on expert interviews conducted for the purpose of this study.
- [4] HEAL Food Alliance, The HEAL Platform for Real Food.
- [5] Planet Tracker, Financial Markets Roadmap for Transforming the Global Food System (2023).
- [6] Tilt Collective & Systemiq, Transforming the Global Food System: A Philanthropic Return on Investment Analysis (2024).
- [7] Food and Land Use Coalition (FOLU), Growing Better: Ten Critical Transitions to Transform Food and Land Use (2019).
- [8] Science Based Targets Network (SBTN), Land and Freshwater Technical Guidance.
- [9] Finance for Biodiversity Foundation, Sectoral Investor Engagement Brief on Nature: Food and Agriculture.

PART 3

INTERVENTION STACKING

Introduction: From Isolated Grants to Systemic Architecture

The structural challenges facing the U.S. food and agriculture system are unlikely to be addressed through fragmented or siloed approaches. Individual accountability interventions can generate important progress, but their impact may remain limited without the wider conditions needed to support and sustain change. A narrative campaign, for example, may struggle to translate public awareness into change without corresponding regulatory or market incentives, while a new data platform will have limited accountability value if the information it generates is not connected to enforcement, financial decision-making, or other mechanisms for consequence.

A more systemic approach would deliberately connect interventions across multiple accountability levers. We refer to this as intervention stacking: the coordinated combination of complementary interventions so that each strengthens the effectiveness of the others. Rather than treating policy, civil society oversight, finance, data, markets, and narratives as separate areas of activity, intervention stacks bring these levers together around a specific accountability challenge or opportunity.

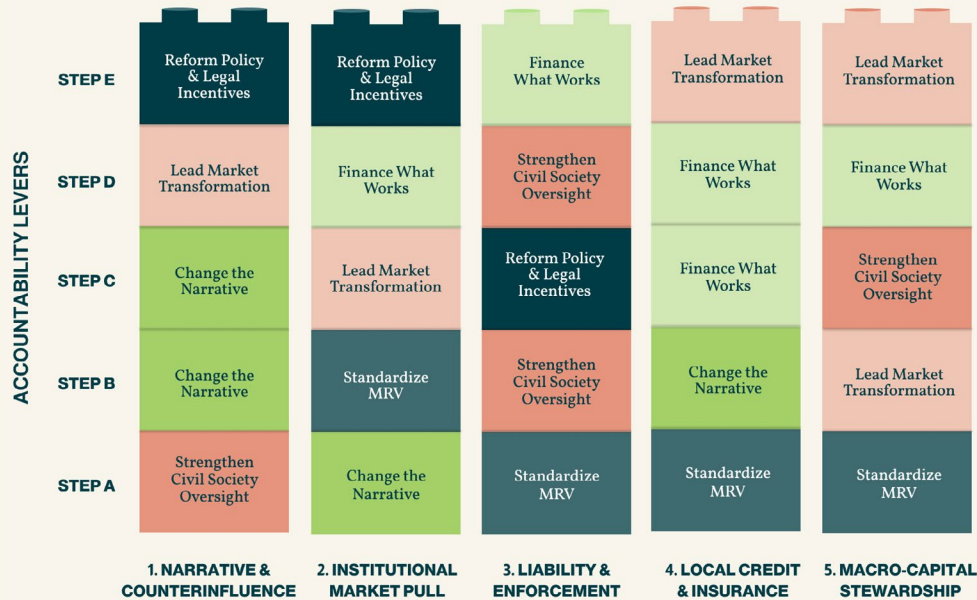
The value of this approach lies in the interaction between the different levers. Better data can strengthen civil society oversight and regulatory enforcement; stronger standards can give investors and companies clearer signals for decision-making; financial mechanisms can reduce the risks associated with transition; and effective narratives can build the public and political support needed to sustain reform. When designed together, these interventions can help address information gaps, align incentives, strengthen consequences for poor performance, and create the conditions for public and private actors to support more resilient and sustainable models.

The following models illustrate how interventions across the six accountability levers could be combined and sequenced around specific challenges within the food and agriculture system. They are not intended as fixed blueprints, but as examples of how philanthropy can support more coordinated approaches to accountability, in which different interventions reinforce one another and create the conditions for more durable and scalable change.

INTERVENTION STACKS AS ACCOUNTABILITY INFRASTRUCTURE

COMBINING LEVERS. STRENGTHENING SYSTEMS.

Different accountability challenges require different combinations of levers. Intervention stacks combine and sequence these levers in different ways—creating the conditions that drive systemic change.



Single interventions strengthen individual layers. **Intervention stacks strengthen multiple layers simultaneously.**

Stack 1: Narrative & Counter-Influence

Target State & Vision of Success

The objective of this stack is to strengthen transparency and accountability around the corporate influence, communications and political activities that shape food and agricultural policy. Success would mean that companies are less able to separate public sustainability commitments from lobbying, political expenditure or communications activities that undermine those commitments. Greater transparency combined with stronger independent media scrutiny would increase the reputational and regulatory consequences of misleading claims and create stronger incentives for companies to align their public commitments, policy positions and business practices. For companies less responsive to reputational pressure, greater transparency can also strengthen the ability of investors, customers, regulators and legal advocates to apply other forms of consequence.

At the same time, stronger public narratives and evidence of public attitudes can help translate growing public concern about affordability, health, environmental resilience and farmer

livelihoods into clearer signals for policymakers and markets. Connecting these narratives with credible transition pathways for farmers and producers would help demonstrate not only why change is needed, but how it can be practically and economically achieved and who stands to benefit.

Activity Focus:

Balancing Corporate Influence with Constituency

This stack combines transparency, independent media, public narrative, producer transition pathways, and policy engagement to strengthen accountability across the food system. The interventions are designed to reinforce one another: evidence of corporate influence strengthens investigative reporting; stronger reporting informs public understanding; credible alternative narratives demonstrate that different pathways are possible; producer transition models show how change can work in practice; and evidence of public attitudes can help translate that momentum into policy reform. Policy and market shifts can, in turn, create stronger incentives for corporate alignment and greater space for credible leaders, reinforcing the cycle. Communications and narrative interventions should also connect with community outreach and organising, helping translate greater public understanding into active constituencies capable of supporting policy and market reform.

The strategy should distinguish between audiences and actors: supporting credible leaders, creating incentives for those beginning to transition, increasing consequences for laggards and bad-faith actors, and building broader public and political support for reform through messages and messengers that resonate with different constituencies.

Step A

Strengthen Civil Society Oversight:

Build on existing transparency infrastructure to systematically map the political activities of major food and agriculture companies, trade associations and other proxies. This could include lobbying expenditure, political spending, policy positions, trade association memberships, revolving-door relationships, charitable and CSR activity, research funding, and other forms of influence, as well as bringing this information together through publicly accessible databases. The resulting evidence could be used by journalists, civil society organisations, financial accountability groups, and institutional investor initiatives such as Nature Action 100 (NA100) to identify inconsistencies between corporate sustainability commitments and political activity and assess the congruence between stated corporate positions and wider influence strategies.

Step B

Change the Narrative:

Support a well-resourced network of independent journalists and media professionals with the expertise and tools to identify, investigate, and challenge misleading environmental and sustainability claims within the agrifood sector, including supporting and connecting organizations already doing this work. Strengthening journalists' ability to interrogate industry narratives, including claims that equate increasing production with food security, could improve the quality of public debate and bring greater attention to resilience, nutrition, biodiversity, and a just agricultural transition. Rapid-response capacity could also help ensure misleading claims are challenged before they become established narratives. Rapid-response capacity could also help connect moments of heightened public attention to credible evidence of environmental, health, and economic harm, strengthening public scrutiny of companies whose practices conflict with their public commitments.

Step C**Change the Narrative:**

Support media, academia, cultural, and advocacy organisations to develop compelling narratives that broaden public understanding of what a more sustainable and resilient food system could look like. Rather than relying primarily on environmental arguments, these narratives could connect reform to everyday priorities such as affordability, health, economic resilience and farmer livelihoods. Partnerships with organisations such as Rare could help bring food, nature, health, and resilience narratives into popular culture and entertainment, reaching audiences beyond traditional environmental constituencies and making alternative food system pathways more visible and relatable.

Step D**Lead Market Transformation:**

Bring greater visibility to the economic pressures facing farmers locked into high-input production systems or constrained by relationships with input providers and corporate off-takers. At the same time, highlight credible transition pathways that demonstrate how producers can move towards more resilient models. Initiatives such as Mercy for Animals' Transformation Project provide one example of how contract CAFO farmers can be supported with practical, asset-level pathways to transition towards regenerative plant-based crop production. Farmer-led examples can make these pathways tangible, demonstrating the economic and practical realities of transition through trusted voices rather than abstract advocacy. Connecting these experiences to the wider narrative helps demonstrate that transition is not simply an environmental ambition, but a practical economic proposition for producers and rural communities and gives farmers themselves a stronger role in shaping the narrative around transition.

Step E**Reform Policy & Legal Incentives:**

Support public health and behavioural researchers to undertake robust polling on public attitudes towards food, health, and agricultural regulation. Translating this evidence into accessible insights for advocates and policymakers can help identify areas of broad and cross-partisan public support and demonstrate the political viability of reforms relating to food safety, public health, environmental performance, and more resilient agricultural systems. This creates a pathway for broader cultural and narrative change to inform concrete policy reform.

Systemic Synergies

Together, these interventions create a reinforcing cycle that increases the reputational and regulatory consequences of corporate practices that are inconsistent with public sustainability commitments. Greater transparency around corporate lobbying and political activity strengthens the ability of journalists, civil society, and investors to scrutinize greenwashing and other misleading claims, creating stronger incentives for companies to align their public commitments with their wider business and political activities.

At the same time, stronger public narratives and credible examples of producer transition can help demonstrate that alternative food system pathways are both possible and economically viable. Public polling can then provide clearer evidence of support for food, health, and agricultural reform, helping translate broader shifts in public understanding into stronger signals for policymakers. Together, these interventions can create more favourable conditions for policy reform and greater support for farmers navigating the transition. As policy, market and public expectations shift, companies face stronger incentives to align their practices and political activities with their stated commitments, creating a reinforcing cycle rather than a series of isolated interventions.

Performance Indicators & Measures of Success



Media Accountability:

Increase in mainstream and investigative journalism examining and challenging agrifood greenwashing, corporate lobbying, and inconsistencies between public commitments and corporate practice.



Narrative Shift:

Evidence that priority public and media narratives increasingly reflect affordability, health, resilience and farmer livelihood considerations, alongside reduced prevalence or influence of misleading industry narratives.



Policy Uptake:

Number of legislative proposals, policy platforms, or regulatory initiatives introduced, substantially advanced, or adopted that draw on public polling and evidence relating to food, health, and agricultural reform, including evidence of support across different political constituencies.



Corporate Alignment:

Evidence of increased alignment between corporate sustainability commitments, public communications, lobbying positions, and trade association activity.



Producer Transition Uptake:

Number of producers or rural operations successfully adopting credible alternative production or transition models, including approaches such as those supported through the Transformation Project.

Stack 2: Institutional Market Pull

Target State & Vision of Success

The objective of this stack is to use public and institutional procurement to create predictable, long-term demand for more sustainable regional agriculture. Success would mean that schools, universities, hospitals, and other public institutions move beyond procurement decisions based primarily on short-term cost and begin to account for the wider health, environmental, and regional economic value of their purchasing choices.

Localized True Cost Accounting (TCA) models and related decision-support tools could help institutions assess these wider benefits and build the case for shifting procurement towards sustainable regional supply chains. Coordinated demand and multi-year purchasing agreements could then provide producers with greater certainty over future revenues,

reducing some of the financial risks associated with transition. In turn, these contracts could strengthen producers' access to affordable commercial finance by giving lenders greater confidence in future revenues. Over time, successful institutional procurement models could also demonstrate the viability of stronger food and health standards and inform wider policy and regulatory reform, including, where relevant, approaches addressing the availability and marketing of ultra-processed foods (UPFs).

Activity Focus: Public Procurement as a Regional Market Catalyst

This stack combines public health evidence, True Cost Accounting, institutional purchasing power, producer finance, and policy reform to create stronger and more predictable demand for sustainable regional agriculture. Its central proposition is that institutional demand can become a market-making mechanism: when multiple large purchasers align their requirements and provide longer-term demand signals, they can improve the economics of transition for producers and the institutions that finance them. The interventions could be concentrated within a defined geographic area, such as a major city and its surrounding agricultural region, allowing institutional demand, regional supply, finance, and policy to be connected within the same market.

Step A

Change the Narrative:

Support civil society and academic institutions to strengthen the evidence base connecting healthier, more sustainable food systems with public health, educational, environmental, and regional economic outcomes. This could include longitudinal research examining the relationship between greater access to whole, nutrient-dense foods and outcomes such as obesity, student wellbeing, academic performance, and absenteeism, alongside research into how stronger regional food systems can support local employment and increase resilience to food-price volatility. Where possible, research could also examine how different agricultural production systems affect nutritional quality and wider environmental outcomes. Evidence from successful institutional buyers, producers and regional initiatives could complement this research by demonstrating what works in practice.

Step B

Standardize MRV:

Support data organisations and economists to translate these health, environmental, procurement, and regional economic benefits into localized True Cost Accounting models or equivalent decision-support tools. Practical TCA tools could help municipal budget officers, school districts, universities, and hospital administrators assess procurement decisions beyond immediate purchase price, including potential longer-term healthcare, environmental, and economic impacts. This would provide institutions with a stronger evidence base for assessing and justifying changes in procurement using comparable and decision-relevant information.

Step C

Lead Market Transformation:

Bring together institutional buyers within the same geographic region to align procurement standards and aggregate demand for sustainable regional food. Public school districts, universities, hospitals, and other large purchasers could establish shared sourcing criteria and enter into multi-year purchasing agreements with qualifying regional suppliers. Predictable demand at sufficient scale would give producers greater confidence to invest in transition while demonstrating the practical viability of more sustainable institutional procurement. Aggregation would also reduce the risk that individual institutions or producers must move first, allowing multiple actors to shift together around a clearer market signal.

Step D**Finance What Works:**

Engage regional commercial banks, Farm Credit institutions, and other agricultural lenders to incorporate secure institutional purchasing agreements into their underwriting decisions. Predictable, multi-year revenues could strengthen the credit profile of transitioning producers and support access to lower-cost transition loans, equipment finance, and working capital, reducing reliance on land equity as the primary source of collateral. This connects procurement directly to the financing conditions that determine whether producers can act on the demand signal.

Step E

Reform Policy & Legal Incentives: Build on successful institutional procurement models to identify where enabling policy can embed, expand or replicate effective approaches. This could include changes to public procurement rules, sourcing standards, budget frameworks, or food and health requirements that make it easier for institutions to account for wider public value in purchasing decisions. Where the evidence supports it, civil society organisations and legal advocates could also explore complementary public-health measures relating to ultra-processed foods, drawing on lessons from other regulated sectors. These could include front-of-pack warning labels, restrictions on marketing to children, or standards governing UPFs in public facilities. Institutional procurement networks could provide an early testing ground for these approaches and demonstrate their practical and economic feasibility.

Systemic Synergies

The strength of this stack lies in creating a reinforcing connection between evidence, purchasing power, producer finance, and policy. Public health and environmental evidence establishes the case for change, while True Cost Accounting and related tools translate these wider benefits into information that institutional decision-makers can use. Coordinated procurement then converts that evidence into predictable market demand.

Multi-year purchasing agreements can, in turn, reduce uncertainty for producers and provide lenders with greater confidence in future revenues, helping unlock the finance needed for transition. Rather than relying on philanthropy to continuously subsidize producer income, philanthropic support can help build the evidence, tools, relationships, and connective infrastructure needed to redirect existing institutional purchasing power towards more sustainable regional supply chains.

As these models demonstrate viability at scale, they can create the evidence and constituency needed to embed successful approaches in procurement rules and wider policy. In this way, institutional procurement becomes more than a purchasing decision: it connects public health objectives, market demand, producer transition, commercial finance, and longer-term regulatory change in a reinforcing cycle.

Performance Indicators & Measures of Success

**Institutional Sourcing Share:**

Total value and percentage of participating municipal, educational, and healthcare procurement budgets committed through multi-year sustainable regional sourcing agreements, including the number of institutions participating in coordinated procurement arrangements.

**Producer Participation & Transition:**

Number of producers participating in institutional sourcing agreements and evidence of resulting investment in, or adoption of, more sustainable and resilient production practices.

**Transition Finance:**

Volume and terms of commercial finance made available to transitioning producers where institutional purchasing agreements contribute to underwriting decisions, including evidence of reduced borrowing costs or improved access to credit.

**TCA Adoption:**

Number of participating institutions using localized True Cost Accounting tools or equivalent approaches to inform procurement decisions, alongside evidence that these tools influence budget allocation or sourcing practices.

**Policy Uptake:**

Number of local or state jurisdictions introducing or adopting food and public health measures informed by the institutional model, including procurement standards, labelling requirements, restrictions on marketing to children, or standards governing UPFs in public facilities.

Stack 3: Liability & Enforcement

Target State & Vision of Success

The objective of this stack is to address information gaps that allow landscape-level environmental harm to remain poorly documented, weakly enforced, and largely absent from corporate and financial risk assessments. Success would mean that environmental impacts are more consistently identified and monitored through accessible geospatial data, remote sensing, and community-generated evidence, reducing reliance on fragmented corporate disclosure or limited state monitoring and making credible evidence available to the communities and institutions able to act on it.

Frontline communities, civil society organisations, public-interest legal networks, and regulators would have access to credible, legally robust evidence that can be used to pursue enforcement of existing environmental protections, seek remedy, and hold companies accountable for environmental harm. Over time, evidence of regulatory non-compliance, litigation, remediation costs, and other environmental liabilities could also be incorporated more systematically into lending and insurance decisions. This would help make environmental compliance and performance increasingly relevant to the cost and availability of capital.

Activity Focus:

Linking Environmental Harm to Liability

This stack combines independent environmental monitoring, community-generated evidence, public-interest law, regulatory engagement, strategic litigation, and financial risk assessment. The interventions are deliberately sequenced: monitoring makes environmental harm visible; communities and civil society turn monitoring into locally grounded and actionable evidence; legal and administrative action connects that evidence to existing obligations; litigation and enforcement create tangible consequences; and financial institutions incorporate demonstrated liabilities and compliance failures into their assessment of corporate risk.

Step A

Standardize MRV:

Develop open-source data platforms and strengthen the capacity of geospatial analysts and community partners to use remote sensing and other technologies for independent environmental monitoring and verification. This could include drone surveys and satellite monitoring to identify practices such as winter manure application on snow, as well as mapping the size, location, and corporate ownership of Concentrated Animal Feeding Operations (CAFOs). These approaches could help address critical information gaps where federal or state agencies lack comprehensive or up-to-date spatial data while creating a shared evidence base that can be used across civil society, regulatory, legal and financial interventions.

Step B

Strengthen Civil Society Oversight:

Enable frontline communities, environmental organisations, and public-interest legal groups to combine independent spatial monitoring with locally gathered evidence and use it to strengthen regulatory enforcement. Drawing on approaches used by organisations such as the Minnesota Center for Environmental Advocacy, community-legal coalitions could use stronger evidence to challenge failures to implement existing environmental protections and, where appropriate, pursue legal action to compel enforcement of statutes such as the Clean Water Act. This would strengthen community recourse by connecting technical monitoring capacity with local knowledge, legal expertise, and pathways to remedy.

Step C

Reform Policy & Legal Incentives:

Translate complex environmental and spatial data into accessible evidence that can be used in regulatory proceedings, administrative petitions, and policy engagement. Citizen-generated watershed data, for example, could be combined with U.S. Geological Survey (USGS) natural capital baselines and other authoritative datasets to provide evidence briefings to state legislators, Attorneys General, and federal agencies. This could also help establish clearer connections between upstream environmental impacts and downstream corporate sourcing, sustainability, and marketing claims, making it easier to identify where responsibility and economic benefit sit across the value chain.

Step D

Strengthen Civil Society Oversight:

Where evidence demonstrates significant environmental harm or non-compliance, support coordinated strategic litigation and other legal pathways capable of establishing meaningful consequences and, where appropriate, legal precedent. Public-interest legal networks could draw on the accumulated evidence base to pursue relevant tort, public nuisance, statutory, or deceptive marketing claims. Successful actions could help ensure that responsible actors bear appropriate remediation and community remedy costs, while creating clearer expectations for environmental compliance across the wider sector.

Step E**Finance What Works:**

Engage commercial lenders, reinsurers, and financial institutions to incorporate financially material and legally established environmental liabilities, compliance failures, litigation, and enforcement actions more systematically into credit and insurance risk assessments. Rather than treating nature-related risk primarily as a voluntary disclosure issue, financial institutions could use evidence of environmental non-compliance and associated financial consequences to strengthen due diligence, adjust credit assessments, and, where appropriate, reflect higher risks in the pricing or availability of debt and insurance.

Systemic Synergies

The strength of this stack lies in connecting environmental information to tangible legal and financial consequences. Independent monitoring first makes previously undocumented or poorly understood environmental impacts visible, while community-generated evidence helps establish their local significance and creates pathways for affected communities to seek recourse. Civil society organisations, communities, regulators, and legal advocates can then use that evidence to strengthen enforcement and pursue accountability through existing administrative and legal mechanisms.

Where these processes establish non-compliance, remediation obligations, or other liabilities, environmental harm becomes increasingly relevant to corporate risk and financial decision-making. Lenders and insurers can incorporate demonstrated liabilities and associated financial consequences into due diligence and underwriting, creating stronger financial incentives for companies to prevent environmental harm and maintain compliance.

The sequence therefore creates a reinforcing accountability pathway: monitoring generates evidence; attribution connects impacts to responsible actors; evidence enables enforcement; enforcement establishes consequence; and consequence informs financial risk. Rather than relying solely on new regulation, the stack strengthens connective tissue between existing environmental protections, legal mechanisms, and financial systems allowing each to be mutually reinforcing.

Performance Indicators & Measures of Success

**Regulatory & Legal Enforcement:**

Number and outcomes of legal interventions, administrative actions, consent decrees, or other enforcement measures in which independent environmental or geospatial evidence contributes to improved compliance with existing environmental protections.

**Evidence Uptake:**

Number of courts, regulators, or administrative bodies that accept or substantively use community-generated, remote-sensing, or independent spatial monitoring evidence in proceedings or enforcement decisions, including evidence that affected communities gain greater access to enforcement or remedy pathways.

**Environmental Data Coverage:**

Proportion of relevant operations and infrastructure within a target geography, including previously undocumented facilities such as CAFOs, captured through independent geospatial monitoring and made accessible for accountability purposes.

**Financial Risk Integration:**

Evidence that commercial lenders, insurers, reinsurers, or relevant financial standard-setting bodies incorporate demonstrated environmental compliance records, litigation, enforcement actions, or associated liabilities into credit assessment, due diligence, or underwriting frameworks.

Stack 4: Local Credit & Insurance

Target State & Vision of Success

The objective of this stack is to connect localized soil health and land stewardship data directly to financing and insurance decisions, so that demonstrated improvements in resilience can be recognised in the pricing and availability of finance and insurance. Success would mean that regional commercial banks actively use standardized agronomic data to assign financial value to conservation practices, recognising them as verified indicators of reduced risk and greater resilience.

By connecting data and expertise across lenders, actuaries, scientists, and producers, land management and resilience metrics can be embedded more directly into credit pricing and insurance risk models. As reinsurance institutions increasingly test and recognise the role of regenerative practices in reducing exposure to extreme-weather yield shocks, these metrics can also be reflected in reinsurance pricing and requirements. This, in turn, can create stronger incentives for local lenders and insurers to favour more resilient agricultural operations through their own underwriting and pricing decisions.

Activity Focus: Pricing Agronomic Resilience into Risk

This stack brings together localized agronomic data, commercial lending, insurance, and reinsurance to ensure that the financial value of land stewardship and agricultural resilience is more consistently recognised where supported by evidence. The interventions build from local evidence and producer-level finance towards wider changes in financial risk assessment: standardized data enables lenders to value resilience; producers are equipped to navigate and benefit from these financial systems; banks incorporate nature risk into their portfolios; insurers translate ecological resilience into actuarial models; and reinsurers and public crop insurance programmes help embed these approaches more widely across the market.

Step A**Standardize MRV:**

Technical institutions and conservation experts collaborate to promote and deploy standardized agronomic databases that demonstrate the relationship between sustainable land management and yield resilience across different crops, geographies and weather conditions. This could include integrating relevant datasets held by public institutions such as the U.S. Geological Survey (USGS) with farm-level and other agronomic datasets, enabling local credit officers to assign financial value to conservation practices where the evidence demonstrates reduced risk and recognise them as indicators of greater resilience to extreme-weather events. Where possible, the approach should draw on existing data and reporting systems rather than creating additional reporting burdens for producers.

Step B**Change the Narrative:**

Agricultural networks provide producers with practical tools and training to understand how existing credit, insurance, and regulatory systems affect farm-level economics. The aim would be to shift the proposition around regenerative and conservation practices from primarily an environmental case to one grounded in farm economics, resilience and risk management. Producer networks and trusted agricultural advisers could demonstrate how improved stewardship may reduce exposure to input-cost volatility and weather shocks, while helping farmers navigate the lending and insurance options developed through the stack.

Step C**Finance What Works:**

Regional commercial banks undertake targeted nature-risk mapping across their existing agricultural lending portfolios. By mapping current borrowers and lending products against specific physical and transition nature risks, credit committees can better identify portfolio exposure, test and quantify the financial value of more resilient operations. This provides a basis for incorporating nature risk more systematically into credit decisions and offering preferential financing or other improved terms where improved resilience demonstrably reduces financial risk.

Step D**Finance What Works:**

Conservation scientists and agronomic experts work directly with insurance actuaries to integrate land stewardship and resilience into insurance risk models. Translating indicators such as soil-moisture retention and topsoil stability into actuarial assessments would allow local insurers to more accurately test whether and to what extent these practices reduce insured losses and, where supported by the evidence, offer improved premium structures or other terms to producers using land-management practices that reduce exposure to environmental and climate shocks.

Step E**Lead Market Transformation:**

Global reinsurance institutions and the Federal Crop Insurance Program (FCIP) incorporate validated agronomic resilience metrics into wider agricultural risk and underwriting frameworks. Reinsurers carry significant exposure to agricultural climate liabilities, giving them a strong financial incentive to identify and reward practices demonstrated to mitigate yield shocks and insured losses. Reflecting these resilience benefits in reinsurance pricing and requirements can create a wider market signal, encouraging primary insurers to incorporate the same ecological risk metrics into their own underwriting and pricing decisions. Integration into public crop insurance could further accelerate adoption by embedding proven approaches within one of the principal risk-management systems shaping U.S. farm economics.

Systemic Synergies

This sequence addresses a critical capital allocation failure at the farm level by connecting soil health and land stewardship directly to the financial systems that price and share agricultural risk. Standardized agronomic data gives lenders and insurers the evidence needed to test and quantify the financial implications of poor soil stewardship and the resilience benefits associated with more sustainable land management.

As these metrics are incorporated into local credit and insurance decisions, producers demonstrating reduced risk can benefit from improved access to capital and more favourable insurance terms. The effect can then extend through the wider risk-sharing system. As reinsurers recognise nature-related resilience as a material risk-mitigation factor, changes in reinsurance pricing and requirements can encourage local insurers and public crop insurance programmes to improve their own actuarial models and more consistently reward resilient practices.

The stack therefore creates a reinforcing pathway that connects land stewardship and soil health with measurable resilience, incorporates that resilience into financial risk assessment, and ultimately translates it into improved credit and insurance terms and wider changes in underwriting standards. Those improved terms create a stronger economic incentive for producers to adopt and maintain practices that improve resilience, generating further evidence that can strengthen the underlying risk models. In this way, ecological resilience becomes increasingly visible and valuable within mainstream agricultural finance.

Performance Indicators & Measures of Success

- **Actuarial Credit & Insurance Pricing:**
Number of regional agricultural lenders and insurers using integrated conservation and agronomic databases to offer preferential interest rates, insurance premiums, or other improved financial terms where verified land stewardship is demonstrated to reduce financial or insured risk.
- **Portfolio De-risking:**
Total value or proportion of commercial agricultural lending portfolios mapped against physical and transition nature risks, with these assessments incorporated into credit and portfolio-management decisions.
- **Producer Uptake:**
Number and proportion of eligible producers accessing improved credit or insurance terms linked to verified resilience practices, alongside evidence of resulting adoption or maintenance of those practices.
- **Reinsurance Treaty Restructuring:**
Number of reinsurance providers adjusting treaty pricing or incorporating ecological resilience and nature-risk metrics into primary crop insurance underwriting requirements.

Stack 5: Macro-Capital Stewardship

Target State & Vision of Success

The objective of this stack is to operationalize the fiduciary responsibilities of universal owners and multi-asset institutional investors to drive greater accountability and resilience across agrifood supply chains. Success would mean reducing reliance on voluntary and unverified corporate disclosures by giving investors more robust evidence of both physical supply-chain risks and corporate policy performance.

By combining granular physical risk metrics, such as geographic commodity concentration, with corporate policy and lobbying data, investors can more clearly distinguish between public sustainability commitments and material corporate performance. For universal owners, this can also make visible risks that cannot simply be diversified away because degradation of water, soil, climate resilience, and other natural systems can affect multiple companies, sectors, and asset classes simultaneously. Equipped with this integrated evidence base, institutional investor coalitions can undertake coordinated corporate engagement and establish clearer expectations for companies to align procurement decisions, political activities, and capital allocation with science-based landscape targets.

Activity Focus: Pricing Agronomic Resilience into Risk

This stack combines physical supply-chain risk analysis, corporate policy tracking, institutional portfolio risk assessment, and coordinated investor stewardship. The interventions build progressively: commodity exposure profiles make physical vulnerabilities visible; engagement with major downstream buyers identifies how those vulnerabilities translate into operational risk and where investment in resilience could reduce exposure; corporate policy tracking reveals potential inconsistencies between sustainability commitments and political activity; institutional investors integrate both sets of information into portfolio risk models; and investor coalitions use this combined evidence to strengthen corporate stewardship and drive greater investment in supply-chain resilience.

Step A

Standardize MRV:

Financial market sustainability initiatives develop granular Commodity Concentration Exposure Profiles that map the material vulnerability of downstream agrifood companies to geographically concentrated supply risks. This could include publicly accessible metrics quantifying the exposure of global food companies, such as Hershey or Ferrero, to localized climate and resource disruptions, including West African cocoa droughts or Turkish hazelnut supply shocks. Standardized profiles could allow investors to compare exposures across companies and identify where common dependencies create concentrations of risk across portfolios.

Step B**Lead Market Transformation:**

Investor networks use these exposure profiles to engage major downstream retailers and other corporate buyers facing direct commercial disruption from resource variability. This could include working with major supermarkets to conduct detailed water-risk assessments across fresh produce supply chains, enabling them to identify mitigation measures and act as anchor partners in landscape-scale watershed resilience initiatives. Where multiple companies share exposure to the same landscape or resource system, the analysis could also identify opportunities for pre-competitive investment and collective action that would be difficult for individual companies to undertake alone.

Step C**Strengthen Civil Society Oversight:**

Philanthropy funds structured corporate policy tracking platforms to document corporate political influence and map lobbying alignments. For example, financing research organizations (such as InfluenceMap or academic groups like U.S. Right to Know) to track corporate political expenditures could help investors assess the divergence between a corporation's public sustainability targets and its active lobbying against environmental policies. Within this stack, the purpose is specifically to identify whether corporate political activity supports or undermines the wider policy conditions needed to manage systemic agrifood risks.

Step D**Finance What Works:**

Universal owners, asset managers, and other large institutional investors integrate commodity exposure profiles and corporate policy-tracking data into long-term portfolio risk assessment. Linking political influence datasets with spatial commodity-risk metrics could allow investors to better understand and quantify how company-level supply-chain vulnerabilities and corporate political activity contribute to systemic risks across diversified, multi-asset portfolios. This can help identify risks that stewardship and real-economy intervention may address more effectively than portfolio reallocation alone.

Step E**Lead Market Transformation:**

Institutional investor coalitions use this integrated evidence base to undertake coordinated stewardship across the agrifood sector. Networks such as Nature Action 100 (NA100), for example, could use the combined intelligence to inform proxy voting, shareholder engagement, and formal board-level dialogue, creating stronger expectations for companies to align political activity, procurement budgets, and business strategies with verifiable, science-based landscape transition targets. Escalation strategies could link those expectations to concrete changes in corporate procurement, capital expenditure, political activity, and participation in pre-competitive landscape investment.

Systemic Synergies

This sequence strengthens the ability of universal owners and institutional investors to connect physical supply-chain risk with corporate policy and performance. Commodity exposure profiles make geographic and environmental vulnerabilities more visible, while political expenditure and lobbying data allow investors to assess whether corporate policy activities are aligned with stated sustainability commitments and the wider conditions needed to manage systemic risk.

Bringing these data layers together gives institutional investors a stronger basis for incorporating both physical and governance risks into portfolio analysis and stewardship.

For diversified universal owners, this is particularly important where risks cannot simply be avoided through portfolio reallocation because multiple holdings depend on the same underlying natural systems. Coordinated investor engagement can then translate that evidence into clearer expectations for corporate boards, including greater alignment between sustainability commitments, political activity, procurement decisions, and investment in supply-chain resilience.

As these risks become more visible within investment and stewardship frameworks, companies face stronger investor and commercial incentives to address underlying supply-chain vulnerabilities. This can help stimulate greater corporate investment and co-investment in upstream landscape resilience, including water, soil, and sourcing initiatives. The resulting investment can reduce shared landscape and supply-chain vulnerabilities, strengthening the resilience of individual companies while also reducing systemic exposure across diversified portfolios. In this way, better risk visibility informs stewardship; stewardship redirects corporate behaviour and investment; and greater landscape resilience addresses the underlying risks that prompted investor action in the first place.

Performance Indicators & Measures of Success



Stewardship Escalation:

Number of formal engagements, proxy voting instructions, or shareholder resolutions, board level dialogues, or other stewardship interventions undertaken by institutional investor networks such as Nature Action 100 (NA100) using Commodity Concentration Exposure Profiles and related risk data, including evidence of escalation where companies fail to respond.



AUM Portfolio Alignment:

Total assets under management (AUM) for which agrifood investment or stewardship decisions explicitly incorporate verified corporate lobbying, political expenditure, and physical supply-chain risk data.



Pre-Competitive Corporate Co-Investment:

Number of downstream retailers and major agrifood companies participating in joint landscape-scale sourcing or investment initiatives that support upstream watershed, soil, and supply-chain resilience, alongside the value of capital committed.



SBTN Operationalization:

Proportion of participating agrifood companies translating high-level nature commitments into defined, science-based landscape transition budgets, implementation plans, and catchment-level targets, with evidence of capital allocated towards implementation.

CONCLUSION

This assessment identified accountability gaps across legal systems, financial markets, supply chains, standards, monitoring systems, and public discourse. While these gaps manifest differently across contexts, they share a common feature: environmental and social impacts often remain disconnected from the information, incentives, and consequences needed to drive change.

Stakeholders repeatedly emphasized that many of the environmental and social challenges facing food and agriculture, particularly across the high-output commodity landscapes of the Midwest, persist because accountability systems remain fragmented, underdeveloped, or incomplete. As a result, interventions in innovation, farmer support, conservation, finance, and policy can struggle to achieve their full potential.

Without mechanisms that make impacts visible, attributable, and consequential, information remains disconnected from decision-making, incentives remain misaligned, and successful approaches can struggle to scale.

Strengthening accountability infrastructure therefore represents not only a means of reducing harm, but a way of increasing the

effectiveness of a much broader set of food system interventions. Importantly, the assessment suggests that many of the technical building blocks required already exist. Monitoring technologies, traceability systems, environmental data platforms, standards, financial risk assessment tools, and independent oversight mechanisms have all developed significantly and continue to evolve.

Across interviews, stakeholders pointed less to a lack of innovation than to a lack of integration. Existing tools and approaches often remain fragmented across institutions, sectors, and geographies, limiting their ability to influence decisions and outcomes. In the Midwest, for example, this can be seen in the disconnect between conservation actors and agricultural lenders. As highlighted by initiatives such as the River Alliance of Wisconsin,

the challenge is often institutional rather than technological: connecting localized watershed and land stewardship data with commercial credit decisions and farm business models. What remains underdeveloped are the connective systems capable of bringing these different elements together into coherent and effective regional accountability architectures.

The Midwest also offers particularly strong conditions for testing these approaches. Its concentration of commodity production, agricultural lenders, public research institutions, conservation organisations, and shared watershed challenges creates opportunities to connect actors and evidence within defined regional systems. Emerging efforts to link watershed stewardship with agricultural lending in Wisconsin provide an early proof of concept,

while similar models could be tested and adapted across other states and priority landscapes within the Mississippi River basin.

This has important implications for philanthropy and other actors seeking to support systemic change. Philanthropy can play a distinctive role in filling gaps that governments and the private sector cannot address alone, particularly by supporting the shared infrastructure, capacity, and relationships needed to make accountability systems work. This includes shared data infrastructure; legal and forensic capacity; independent and community-based oversight; pre-competitive MRV pilots; farmer-centred transition verification; institutions that bridge lenders, conservation groups, producers, and buyers; and proof-of-concept accountability stacks in priority geographies such as the Mississippi River basin.

Many of the highest-leverage opportunities identified through this assessment therefore sit not within individual organisations or interventions, but in the connections between them. Shared data infrastructure, common standards, coordinated oversight, aligned incentives, pre-competitive collaboration, and stronger links between communities, markets, finance, and policy emerged repeatedly as areas where targeted support could unlock wider system-level benefits. Individual interventions can generate important progress, but stakeholders

consistently highlighted the value of strengthening the connective tissue that allows information, accountability, and resources to move more effectively across the system.

The prioritization map highlights where accountability gaps appear both consequential and ready for action. The six accountability levers outlined in this report provide practical starting points: reforming policy and legal incentives, strengthening civil society oversight, financing what works, standardizing monitoring and verification, supporting market transformation, and strengthening the narratives and coalitions that sustain accountability over time. Each addresses a different dimension of the accountability challenge. Together, they provide a framework for strengthening transparency, verification, consequence, risk allocation, and coordination across the food system.

The intervention stacks take this logic a step further. Accountability failures rarely result from a single missing mechanism. Weak enforcement may be compounded by poor data; stronger standards may achieve little without financial or market incentives; and information may have limited impact if communities, regulators, investors, or other actors lack the capacity to use it. The greatest opportunities are therefore unlikely to come from isolated interventions alone, but from deliberately connecting complementary

approaches so that each strengthens the effectiveness of the others. The future configuration of the food system remains contested, and stakeholders will continue to hold different views about the pathways most likely to succeed. Yet the assessment identified broad agreement on one underlying need: stronger accountability infrastructure would improve the ability of actors across the system to evaluate different pathways, allocate responsibility, manage risk, learn from outcomes, and direct resources towards approaches that deliver meaningful results.

Accountability is therefore not the destination. It is an enabling condition for credible transition pathways to emerge, be tested, improve, and ultimately scale. Regardless of the pathway pursued, stronger accountability systems appear likely to be among the highest-leverage opportunities for improving environmental, social, and economic outcomes across the food system.