

# Berkeley Public Policy Journal

*Fall 2025*



# A Note from the Editors

Dear Reader,

As the United States experiences a second Trump presidency, we again face questions about the role of public policy in a time of polarization, misinformation, and uncertainty. Recent shifts in federal immigration enforcement have revived an atmosphere of fear in undocumented and international communities, including on our own campus. At the same time, the devastation in Sudan, Gaza, and beyond underscores the human cost when policy fails to protect human rights. Against this backdrop, the responsibility of public policy students and practitioners is clear: to defend truth, center humanity, and use analysis as an act of solidarity.

This edition of the Berkeley Public Policy Journal explores strategies for changemaking under challenging conditions.

The article on local barriers to zoning reform in California directly informs strategies for how housing advocates can use their voice to help ameliorate the state's housing crisis. Dunsker and Hunter highlight the importance of incrementalism, streamlined processes, and diverse coalitions as avenues to combating the NIMBYism that has contributed to California's current crisis. While zoning reform is just one small piece of the puzzle, Dunsker and Hunter argue that it can be a powerful tool to catalyze a larger movement towards more affordable housing for all.

Yau's article analyzes Denmark's approach to collecting data on crashes involving pedestrians and cyclists, identifying challenges that stem from an overreliance on police reports and the absence of unified injury classification standards. These issues are further compounded by a failure of inter-agency cooperation between police, hospitals, and transportation authorities. The article's recommendations focus on strengthening data governance through integrated universal injury scales and clear communication channels between state institutions.

Nowakowski identifies how insufficient school lunch seating times have detrimental effects on food waste, student health outcomes, and academic performance. They propose a statewide pilot mandating a 30-minute standardized minimum time. This proposal is not simply about scheduling. It is about recognizing children's right to nourishment, rest, and participation in their school day as full human beings. In a period where large-scale policies feel abstract, this article shows how clarity in design and human-centered approaches can strengthen communities. Justice is not distant; it is embedded in the architecture of our institutions and the policies we create.

Lestari's article on Indonesia's Rp 72 trillion digital lending crisis turns attention to global economic precarity, analyzing

wages, inflation, and debt as potential indicators for inequality. The article proposes a framework of reforms—capped interest rates, low-interest public loans, and disincentives against predatory fintech practices—emphasizing how inclusive financial policy can strengthen consumer protection. As governments worldwide, including our own, debate cutting back on public support, this piece reminds us that financial regulation is not merely a fiscal matter but a moral one, shaping the choices and constraints of everyday life.

Our interview with Marion Nestle opens with her articulation of a clear vision of her personal mission and outlook for what food politics may look like under President Trump. We explore how the Make America Healthy Again movement may reshape the U.S. food system, potentially aligning with Nestle's long-standing advocacy for limiting corporate influence on food policy or failing to deliver on its promises due to rigid governance structures, regulatory capture, or competing priorities. The interview concludes with a reflection on the importance of community organizing, constructive dialogue, and clear articulations of our principles and values, tools that will serve us as we leave Goldman for careers across the policy and advocacy landscapes.

Taken together, these pieces ask how policy can reclaim integrity in an era defined by distortion. They remind us that facts are not enough; justice requires courage. Whether in designing food systems, defending data transparency, protecting borrowers, feeding students, or opening our cities, the work of policy is fundamentally moral.

As editors, we stand with our peers, colleagues, and communities, especially undocumented and international students, who continue to navigate fear, isolation, and uncertainty amid shifting political winds. We offer this issue as both analysis and affirmation: that knowledge shared with honesty and empathy remains one of the most powerful tools of resistance.

*Sincerely,*

*Emma, Keanu, Max, Sanaaz, Simran,  
Sirena, and Veronica*

*Berkeley Public Policy Journal Editors-in-  
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*Photo by Eden Rushing on Unsplash*



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# Rectifying Flaws in Denmark's Traffic Safety Data Collection

by Bim-Ray Yau

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## ABSTRACT:

*Despite being a world leader in active transportation and policy innovation, Denmark's nonfatal collision reporting suffers from common pitfalls: overreliance on police reports, lack of standardized injury classifications (like AIS/MAIS), and poor inter-agency coordination. This report analyzes the Danish state's*

*current mechanisms for recording nonfatal pedestrian and bicyclist injuries. Recommendations include integrating AIS/MAIS, encouraging self-reporting, and establishing clear police-hospital communication to improve data completeness and support targeted safety improvements.*



## EXECUTIVE SUMMARY

Denmark's collision reporting policies remain a laggard compared to its outlier success in promoting multimodal transportation and policy innovation. As a country with one of the highest rates of active transportation usage in transportation modal share and a pioneer in implementing pro-active transportation policies and infrastructure, Denmark should provide a valuable case study in providing information on best practice worldwide. However, in recording nonfatal crashes that involve active transportation users, Denmark suffers from many of the same pitfalls that other nations experience, such as overreliance on police reports and lack of universal injury classification standards. What recommendations can be developed for collecting nationally comparable data on non-fatal injuries sustained by pedestrians and bicyclists that may or may not involve motor vehicles? This report analyzes the current mechanisms used by the Danish state and other relevant transportation institutions in recording non-fatal collision data, and identifies potential areas of improvement for the country's existing policies.

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*The goal is to analyze Denmark's practices of data collection for collisions to learn about potential best practice, or see whether even an exemplar country in popularizing active transportation shares the same pitfalls.*

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## NATIONAL CONTEXT

Denmark's active transportation mode share ranks among the highest among nations worldwide: the Danish National Travel Survey estimated that walking constitutes 23.6 percent of journeys made, while bicycling accounts for 13.7 percent.<sup>1</sup> In cities

like Copenhagen, the capital and largest city, active transportation counts for an even higher proportion in travel mode share: out of all trips to, from, and in Copenhagen, 30 percent are made by walking and 26 percent by bicycling.<sup>2</sup>

The prevalence of active transportation in travel within Denmark is no accident. Copenhagen represents the apogee of the Danish active transportation strategy, with the safety and comfort of cyclists and pedestrians being a priority. Interventions range

from elaborate paths and bridges separated from other modes of traffic like the Inderhavnsbroen water crossing, to simpler implementations such as pulling back stop lines for cars at intersections with bike lanes.<sup>3</sup>

The success of Denmark's promotion of active transportation inspired this report to analyze the country's approach in managing

a key metric of safety in the field: recording collision data. Among other countries seeking to improve active transportation viability, America struggles with undercounting crashes involving pedestrians and bicyclists, underreporting on nonfatal crashes in particular.<sup>4</sup> Incomplete representations of collision data and geographic patterns complicate a planner's task to identify dangerous locations and policies that create injury risks for active transportation users. Underreporting can result in underestimating or overestimating the effects of road safety countermeasures.<sup>5</sup> For example, the United States' Department of Transportation's analysis of crash

	2012	2020	2021	2022	Evolution 2012-22
Reported safety data					
Fatalities	167	163	130	154	-7.8%
Injury crashes	3 124	2 527	2 402	2 563	-18.0%
Hospitalised people	1 809	1 203	1 163	1 227	-32.2%
Deaths per 100 000 population	3.0	2.8	2.2	2.6	-12.4%
Deaths per 10 000 registered vehicles	0.6	0.5	0.4	0.4	-22.2%
Deaths per billion vehicle-kilometres	3.4	3.2	2.4	..	..
Fatalities by road user					
Pedestrians	31	23	19	28	-9.7%
Cyclists	22	27	25	23	4.5%
Moped riders	14	8	5	9	-35.7%
Motorcyclists	10	11	12	16	60.0%
Passenger car occupants	81	80	54	68	-16.0%
Other road users	9	14	15	10	11.1%

Figure 1: Data provided by the Danish Road Directorate to ITF.

data identified an exclusion of events that occurred on non-roadway spaces and those only involving bicycles and/or pedestrians.<sup>6</sup> This omission of pedestrian and bicyclists from datasets will only reinforce the car-oriented street designs that put non-automobile road users at disproportionate risk of injury or death. When reducing traffic injuries and deaths will not only prevent unnatural deaths but also encourage mode shift to travel modes that are healthier for people and friendlier toward the environment, resolving underreporting of crashes becomes an even more important objective. The goal is to analyze Denmark’s practices of data collection for collisions to learn about potential best practice, or see whether even an exemplar country in popularizing active transportation shares the same pitfalls.

CURRENT POLICY

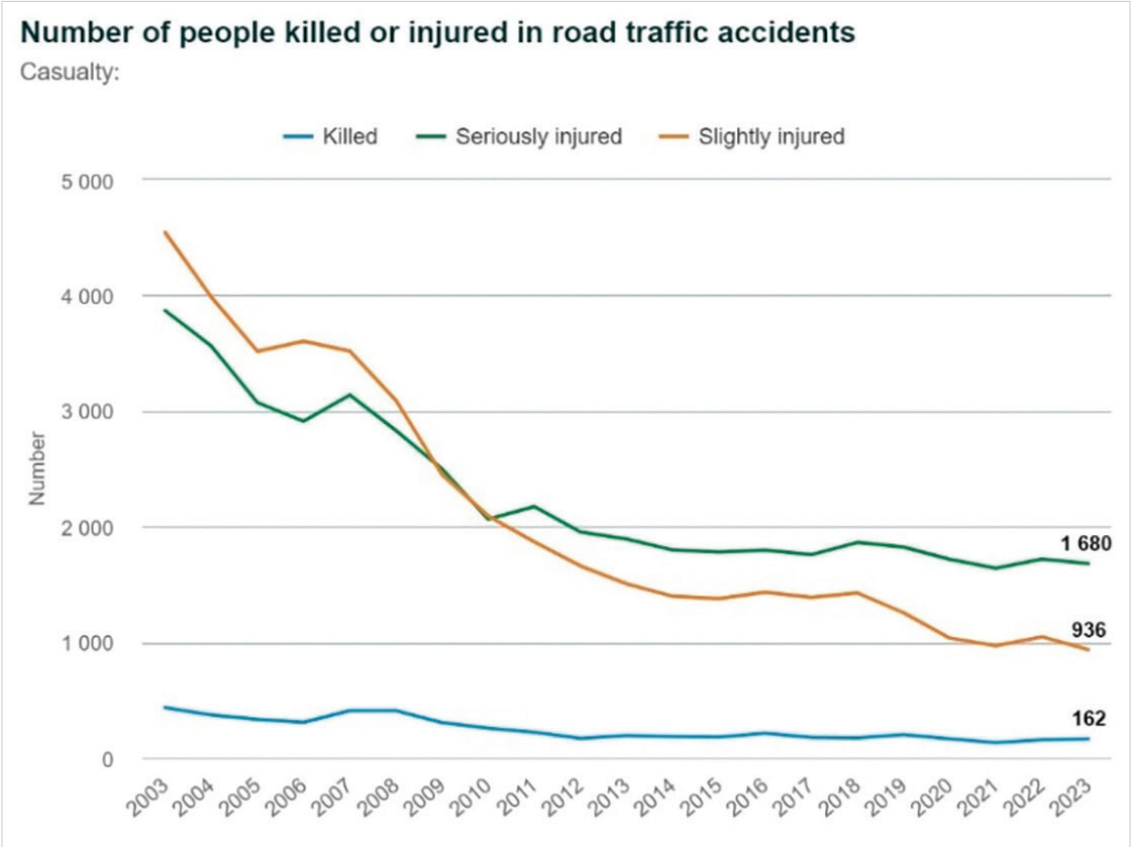
On the national level, the Danish Road Directorate is the main state entity respon-

sible for collecting all crash data into a nationwide database. Most data produced by the Road Directorate are only available in Danish. However, the Road Directorate forwards its data to Statistics Denmark, an organization under the Danish Interior and Housing ministry that creates statistics on Danish society. Statistics Denmark provides information on raw crash data and presents trend interpretations in English, which allows this report to inspect available crash statistics from a direct government source. The Directorate also provides its data to research institutions and other state agencies, such as the International Transport Forum (ITF) and the Technical University of Denmark’s Transport Institute. While there are no known efforts to translate the entire dataset into English or another more widespread language, the data available in English remained sufficient for this paper’s scope.



UHELD3	Road traffic accidents by type of accident, accident situation, urban area and speed limit (1997-2023)
UHELD4	Road traffic accidents by type of accident, type of transport unit involved, hour, day of the week and month (1997-2023)
UHELD5	Road traffic accidents by type of accident, accident situation, transport unit and other units involved (2001-2023)
UHELD6	Road traffic accidents by type of accident, accident situation, transport unit and number of transport units involved (2001-2023)
UHELDK7	Road traffic accidents by type of accident, municipality, urban area and accident situation (1998-2023)
UHELD8	Injured and killed in road traffic accidents by type of accident, casualty, transport unit, sex, age and type of injury (2001-2023)

**Figure 2:** Selection of pre-compiled crash data tables. It is also possible to customize a data table.<sup>10</sup>



**Figure 3:** Fatality and injury trends from 2003-2023 in Denmark from road traffic accidents.<sup>11</sup>

On the municipal level, most large cities such as Copenhagen make available data used by the government on the Open Data DK portal. This includes extensive count data for both automobile and bicycle/ pedestrian traffic, but lacks transportation crash-related statistics. The following analysis thus focuses on observing and analyzing the national-level approach in Denmark on crash records.

*ITF records: Overreliance on police data and lack of detail*

Figure 1 presents the data provided by the Road Directorate to ITF. Crash data from the Directorate differentiates between fatal and non-fatal crashes, with limited denotation on injury severity through recording instances of hospitalization. The dataset only shows the type of road user involved in fatal crashes; other categories such as age and road type of crash locations also suffer from

AIS Numerical Descriptor	AIS Section Descriptor	Body Regions Included
1	Head	Cranium, brain
2	Face	Eye, ear, lips
3	Neck	Neck, throat
4	Thorax	Thoracic contents, including rib-cage
5	Abdomen/Pelvic Contents	Abdominal/pelvic organs
6	Spine	Spinal column/cord
7	Upper extremities	Upper limbs including shoulder
8	Lower extremities	Lower limbs including pelvis
9	External	Integumentary system, including burns

Figure 4: Example of Abbreviated Injury Scale.15

the same limitation. This suggests the lack of more detailed data on nonfatal crashes collected by the Road Directorate.

The ITF report further provides disclaimers on the representativeness of the data provided to them by the Road Directorate:<sup>7</sup>

1. Denmark’s national patient register shows that the number of injury crashes is far higher than that recorded by police reports. However, the register does not include crucial information about crashes such as location and vehicle occupancy.
2. Police reports are the sole source of serious injury data in Road Directorate datasets. There is no way to link injury judgments made by police officers on-site to more professional hospital data. Denmark also fails to conform to Abbreviated Injury Scale (AIS) and Maximum Abbreviated Injury Scale (MAIS) standards, further complicating dataset reliability and consistency on injury crash records. However, the report does note that Danish hospitals are transitioning to using these standards. The transition parallels European Union-

wide initiatives to transition to a version of the MAIS scale, which transportation ministers from EU members approved in 2017.<sup>8</sup>

*Statistics Denmark: Better granularity, but same issues persist*

Statistics Denmark’s compiled crash datasets provide information on modes involved, casualty level, and the region where a crash occurred, among other sorting categories. The granularity of these search parameters, such as the 12 different travel modes available for searching, reflect the comprehensiveness of the reports that the Road Directorate is able to collect.<sup>9</sup>

However, Statistics Denmark echoes ITF’s concerns over the completeness of data in the Road Directorate’s collection process. In its own study of patients treated in Danish casualty wards, the organization found that the total number of injuries recorded far surpasses the data reported to police; Statistics Denmark does note that coverage of crashes involving fatalities “is almost 100 percent” complete.<sup>12</sup> These acknowledgements mean that Denmark, instead of being an exemplar in pioneering collision data collection,



suffers from a host of similar issues that most countries also suffer from in this field.

## POTENTIAL IMPROVEMENTS: ACADEMIC AND POLICY RECOMMENDATIONS

The Danish Road Directorate's data coverage for nonfatal coverage and injury severity have three urgent points to address: lack of unified injury evaluation standards, underreporting of crashes, and lack of coordination between different data collecting institutions. This report suggests three potential solutions that could address these problems:

### 1. Integrating AIS/MAIS into injury evaluation

As mentioned in the ITF report on Denmark, using AIS/MAIS standards in crash injury evaluations will streamline and standardize data collection between both police and hospital workers. AIS/MAIS will not only make Denmark's own datasets more efficient, but also help the country to better compare its statistics with the rest of the European Union, which is already pushing for wider adoption of these standards in conjunction with the union's own CARE dataset.<sup>13</sup> The report mentions that Denmark's hospital system is already in the process of integrating AIS as part of its operational procedures, an effort that deserves praise.<sup>14</sup>

### 2. Encouraging self-reporting and boosting confidence in data

Kaplan et al. conducted an empirical study based on survey and modeling data, finding that three factors played the greatest role in underreporting by cyclists: the belief that crash reporting is useless, concerns over

social stigma for being involved in a crash, and the perception that relevant authorities are difficult to work with.<sup>16</sup> Addressing these issues will require better publicization by the Danish police and hospital system of how the government utilizes crash data, such as in identifying collision hotspots on the traffic network. Making the paperwork that accompanies crash reporting less onerous will also help to encourage higher response rates to fill in data coverage holes. Providing simple, internet-accessible reporting tools could prove useful in helping to plug in this gap.<sup>17</sup> Also of note is the heterogeneity in the likelihood of reporting with respect to

the user and geographic context. People with more severe injuries, people under 18 years old, and females were among groups that were found to have higher reporting rates in Denmark.<sup>18</sup> Targeting efforts to encourage reporting in groups that have lower response rates will also be important to improve representativeness of crash data and facilitate

targeted improvements in equity of road safety.

### 3. Establish clear communication channels between police and hospitals

Denmark is far from the only country to suffer from a lack of inter-agency coordination in crash data sharing, but this does not excuse its past inability to do so. Addressing this issue would improve data coverage in Denmark over the country's current reliance on just police data for this purpose. Joining together data from both police and hospitals brings several potential improvements to data quality by filling in information not

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*A lack of interagency cooperation in data collection, inconsistent injury evaluation standards, and general underreporting of crash data continue to plague Denmark's efforts to improve active transportation safety.*

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recorded in police reports, such as riding speed or road conditions, as found in a study conducted in Denmark's Aarhus municipality.<sup>19</sup> In conjunction with standardizing injury scale measurements, among other improvements, this will help Denmark's planners and other relevant authorities to better identify vulnerable groups and networks for active transportation users than the current status quo.

### *Relying on other measures outside of crash data to target infrastructure improvements*

Sole reliance on crash data poses risks of distorting research outcomes and affecting subsequent countermeasure deployments through creating selection bias, even in crashes that do get reported.<sup>20</sup> Pioneering research made in Denmark suggests additional metrics and tools that can complement crash data in helping to improve transportation safety in the country. Using infrastructure effects as a proxy to investigate crash frequency, as was done in research that found increases in bicycle traffic reduce crash rates in Copenhagen, can redirect valuable time and resources for research toward geographic areas with greater data deficiencies.<sup>21</sup> Matching crash data and their geographic coordinates in GIS to built environment factors such as the 6 D's (Density, Diversity, Design, Destination, Distance, and Demand Management) and road characteristics will help studies in collision safety go beyond traditional crash frequency and injury severity models and help to improve targeted infrastructure or policy changes.<sup>22</sup> The fact that Danish planners and scholars already explored the possibilities of using these approaches point toward the innovative thinking present in Denmark about improving active transportation conditions, despite the deficiencies in the datasets available to them.

## CONCLUSION

Although Denmark persists as a pioneer for active transportation policies and infrastructure, Denmark's existing collision data collection practices face similar pitfalls as most other countries. A lack of interagency cooperation in data collection, inconsistent injury evaluation standards, and general underreporting of crash data continue to plague Denmark's efforts to improve active transportation safety. In the context of the country's strength in promoting active transportation, Denmark's deficient coverage over active transportation injuries and collisions in particular is especially disappointing. However, the Danish state acknowledges the flaws in their status quo, and are already engaging in fixes that aim to combat the identified policy weaknesses. The data that is available, such as those on fatality-inducing collisions and the granularity of search filters available, also suggest that meticulous work has been done to capture as many socio-demographic details related to crashes as possible when able. Even for non-Danish researchers, there are plentiful opportunities to access the Danish Road Directorate and Statistics Denmark's datasets. While Denmark deserves rightful criticism for being mired in the same pitfalls that confront most collision databases worldwide, its position as an exemplar in active transportation policy still endures—one that the country can further build on through improving the data systems that support such policies.

## ENDNOTES

1. Hanne Christiansen and Morten Krog Anderson, The Danish National Travel Survey Annual Statistical Report: Denmark 2023 (2024), [https://orbit.dtu.dk/files/380919984/TU\\_Denmark\\_2023.pdf](https://orbit.dtu.dk/files/380919984/TU_Denmark_2023.pdf).
2. City of Copenhagen, Mobility Analysis 2021 (2021), [https://kk.sites.itera.dk/apps/kk\\_pub2/pdf/2145\\_bb5703a07da4.pdf](https://kk.sites.itera.dk/apps/kk_pub2/pdf/2145_bb5703a07da4.pdf).



3. City of Copenhagen, *Good, Better, Best: The City of Copenhagen's Bicycle Strategy 2011-2025* (2012), [https://kk.sites.itera.dk/apps/kk\\_pub2/index.asp?mode=detalje&cid=823](https://kk.sites.itera.dk/apps/kk_pub2/index.asp?mode=detalje&cid=823).
4. Andrew L. Dannenberg, Daniel A. Rodriguez, and Laura S. Sandt, "Advancing Research in Transportation and Public Health: A Selection of Twenty Project Ideas from a U.S. Research Roadmap," *Journal of Transport & Health* 21 (2021): 101021-, <https://doi.org/10.1016/j.jth.2021.101021>.
5. Sean Doggett, Dorian R. Ragland, and Genevieve Felschundneff, *Evaluating Research on Data Linkage to Assess Underreporting of Pedestrian and Bicyclist Injury in Police Crash Data* (Berkeley: UC Berkeley: Safe Transportation Research & Education Center, 2018), <https://escholarship.org/uc/item/0jq5h6f5>.
6. Jane C. Stutts and William W. Hunter, *Injuries to Pedestrians and Bicyclists: An Analysis Based on Hospital Emergency Department Data* (No. FHWA-RD-99-078) (Chapel Hill, NC: University of North Carolina Highway Safety Research Center, 1999).
7. International Transport Forum (ITF), "Denmark: Road Safety Country Profile 2023," OECD Publishing, Paris, 2024.
8. F. Slootmans and L. Bouwen, *Facts and Figures – Serious Injuries - 2023*, European Road Safety Observatory (European Commission, 2023), [https://road-safety.transport.ec.europa.eu/system/files/2023-03/ff\\_serious\\_injuries\\_20230303.pdf](https://road-safety.transport.ec.europa.eu/system/files/2023-03/ff_serious_injuries_20230303.pdf).
9. Statistics Denmark, "UHELDK1: Injured and Killed in Road Traffic Accidents by Region, Casualty, Motor Vehicles Involved, Age and Sex," Statbank Denmark, [www.statbank.dk/UHELDK1](http://www.statbank.dk/UHELDK1).
10. Statistics Denmark, "Transport," Statbank Denmark, accessed October 14, 2025, <https://www.statbank.dk/20056>.
11. Statistics Denmark, "Road Traffic Accidents," 2024, <https://www.dst.dk/en/Statistik/emner/transport/trafikulykker/faerdselsuheld>.
12. Statistics Denmark, "Documentation of Statistics: Road Traffic Accidents," 2024, <https://www.dst.dk/en/Statistik/dokumentation/documentationofstatistics/road-traffic-accidents>.
13. European Commission: Mobility and Transport, "Serious Injuries," accessed October 14, 2025, [https://road-safety.transport.ec.europa.eu/european-road-safety-observatory/data-and-analysis/serious-injuries\\_en](https://road-safety.transport.ec.europa.eu/european-road-safety-observatory/data-and-analysis/serious-injuries_en).
14. International Transport Forum (ITF), "Denmark: Road Safety Country Profile 2023," OECD Publishing, Paris, 2024.
15. Andrew Morris et al., *Effectiveness of ADR 69: A Case-Control Study of Crashed Vehicles Equipped with Airbags* (Clayton, VIC: Accident Research Center, Monash University, 2001), [https://www.researchgate.net/publication/28575526\\_Effectiveness\\_of\\_ADR\\_69\\_a\\_case-control\\_study\\_of\\_crashed\\_vehicles\\_equipped\\_with\\_airbags](https://www.researchgate.net/publication/28575526_Effectiveness_of_ADR_69_a_case-control_study_of_crashed_vehicles_equipped_with_airbags).
16. Salmon Kaplan, Kåre H. Janstrup, and Charles G. Prato, "Investigating the Reasons behind the Intention to Report Cycling Crashes to the Police and Hospitals in Denmark," *Transportation Research. Part F: Traffic Psychology and Behaviour* 44 (2017): 159–167, <https://doi.org/10.1016/j.trf.2016.11.009>.
17. United Nations Department of Safety and Security, *Road Safety Strategy For the United Nations System and its Personnel* (United Nations, 2019), [https://www.un.org/sites/un2.un.org/files/2020/09/road\\_safety\\_strategy\\_booklet.pdf](https://www.un.org/sites/un2.un.org/files/2020/09/road_safety_strategy_booklet.pdf).
18. Kåre H. Janstrup et al., "Understanding Traffic Crash Under-Reporting: Linking Police and Medical Records to Individual and Crash Characteristics," *Traffic Injury Prevention* 17, no. 6 (2016): 580–584, <https://doi.org/10.1080/15389588.2015.1128533>.
19. Morten Møller, Kåre H. Janstrup, and Nick Pilegaard, "Improving Knowledge of Cyclist Crashes Based on Hospital Data Including Crash Descriptions from Open Text Fields," *Journal of Safety Research* 76 (2021): 36–43, <https://doi.org/10.1016/j.jsr.2020.11.004>.
20. Maria Imprialou and Mohammed Quddus, "Crash Data Quality for Road Safety Research: Current State and Future Directions," *Accident; analysis and prevention* 130 (2019): 84–90, <https://doi.org/10.1016/j.aap.2017.02.022>.
21. Charles G. Prato et al., "Infrastructure and Spatial Effects on the Frequency of Cyclist-Motorist Collisions in the Copenhagen Region," *Journal of Transportation Safety & Security* 8, no. 4 (2016): 346–360, <https://doi.org/10.1080/19439962.2015.1055414>.
22. Charles G. Prato et al., "Integrating Police Reports with Geographic Information System Resources for Uncovering Patterns of Pedestrian Crashes in Denmark," *Journal of Transport Geography* 74 (2019): 10–23, <https://doi.org/10.1016/j.jtrangeo.2018.10.018>.

# Standardized Minimum Seating Time for School Lunches

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## ABSTRACT

*Students across the United States, particularly schools in urban areas, often lack sufficient time to eat lunch, leading to poor nutrition, reduced focus, and food waste. This paper proposes a minimum of 30 minutes of seated lunch time per student, aligned with CDC recommen-*

*dations. Such a policy would promote equity, improve student health, and cut waste. California, with its size and leadership in school nutrition, is well-positioned to pilot and model this reform statewide.*

## I. INTRODUCTION

Inadequate school lunch periods are a growing concern in the United States, with major implications for student health, academic performance, and equity. While initiatives such as the Healthy, Hunger-Free Kids Act of 2010 improved meal quality, many schedules have not kept pace.<sup>1</sup> Students, especially in low-income urban schools, often report insufficient time to eat, leading to rushed meals, skipped lunches, or reliance on nutrient-poor foods.<sup>6</sup>

Federal rules set a lunch window (10 a.m.–2 p.m.) but no seated-time minimum; lines and travel can consume half the period.<sup>2</sup> As a result, actual seated eating time often falls below the CDC’s 20-minute recommendation,<sup>3</sup> with some students reporting as little as 7–10 minutes.<sup>4</sup> Compressed schedules reduce fruit, vegetable, and milk consumption while encouraging faster, less nutritious choices.<sup>5</sup>

The equity stakes are high. Low-income students depend most on school meals, so rushed lunches worsen health and academic disparities.<sup>4</sup> Short periods also increase waste: in Massachusetts schools, students with <20 minutes ate 13 percent less of their entrée, 12 percent less produce, and 10 percent less milk compared with peers with ≥25 minutes.<sup>6</sup>

Despite these harms, the National School Lunch Program only “encourages” sufficient time, leaving districts to set their own standards. Pressures from testing, limited space, and tight schedules often cut into lunch,

even though well-fed students show better concentration and behavior.<sup>7</sup> The absence of an enforceable federal policy is a critical gap. A mandated 30-minute lunch period, with at least 20 minutes seated, would ensure all students can benefit fully from the National School Lunch Program.

## II. ISSUE SUMMARY

### *Problem definition*

The length of school lunch periods varies considerably across the United States, with no national database systematically tracking average or median durations. Because federal regulations set no minimum for seated

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***Ensuring sufficient seated lunch time is therefore not simply a scheduling issue—it is a matter of nutrition, public health, and educational equity.***

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eating time, there is consistent oversight.<sup>6</sup> Reports from parents, administrators, and researchers consistently find that many students—especially in large, low-income or urban schools—receive less time to eat than recommended.

These schools often serve high student populations with limited cafeteria capacity, forcing administrators to prioritize efficiency over adequate nutrition time.<sup>4</sup>

The consequences are wide-ranging. Shortened lunch periods reduce dietary intake, increase food waste, heighten stress, and impair academic performance. Students who rely on free or reduced-price meals are disproportionately affected, as rushed or skipped lunches compound existing barriers to health and learning. Faced with short breaks, children often eat less, choose convenience foods, or skip meals altogether. These patterns increase the risk of hunger, fatigue, and classroom disengagement. Over time,



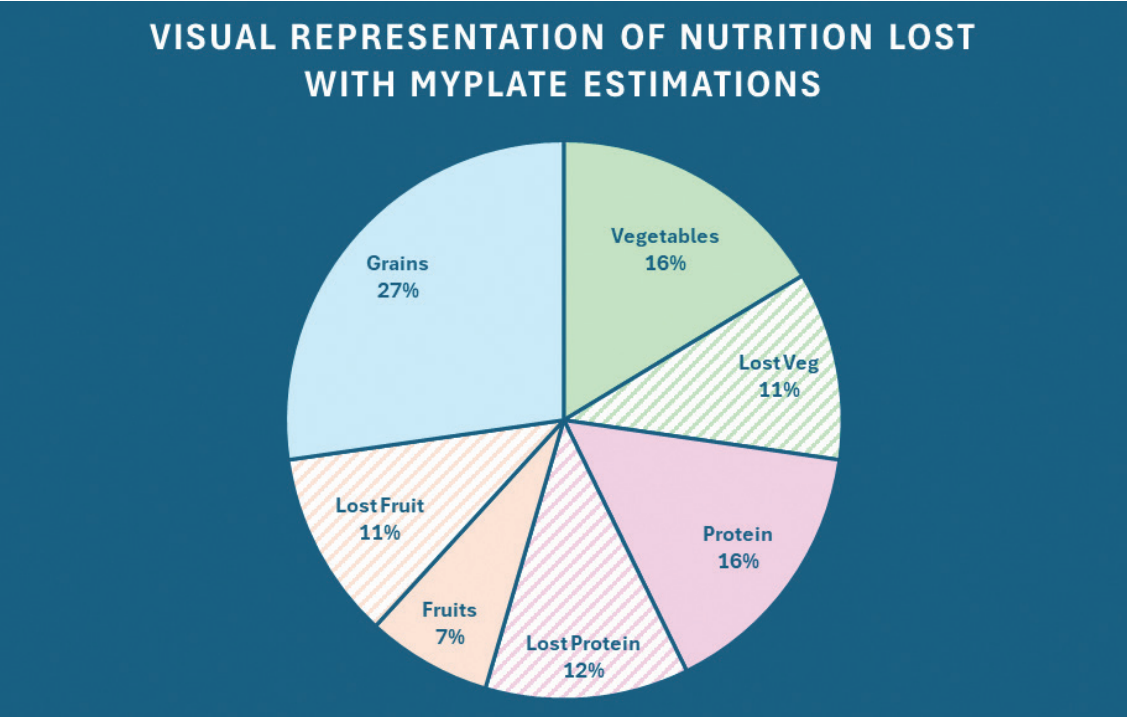


Figure 1.1

inadequate nutrition is linked to long-term cognitive effects and greater risk of chronic diseases such as obesity, diabetes, and cardiovascular problems.<sup>12</sup>

Beyond physical health, the stress of navigating a rushed lunch environment undermines mental well-being, especially for younger students or those with disabilities and trauma histories. Afternoon fatigue and irritability are common, with some students exhibiting hyperactivity or behavioral challenges when they have not eaten enough.<sup>7</sup>

A visual comparison (Figure 1.1) illustrates this impact. According to USDA MyPlate, a balanced meal should include vegetables, fruits, protein, grains, and dairy in roughly equal proportions. When students have fewer than 20 minutes, however, up to 25–40 percent of fruits and vegetables are left uneaten, while faster-to-eat items like protein and grains are more fully consumed.<sup>6</sup>

Ultimately, the absence of clear, enforceable standards undermines the goals of the

National School Lunch Program. Ensuring sufficient seated lunch time is therefore not simply a scheduling issue—it is a matter of nutrition, public health, and educational equity.

*Californian case study*

California educates over six million K–12 students, the largest public school population in the nation, and has been a leader in nutrition policy, adopting universal free meals in 2022. Yet, like the rest of the country, the state does not collect data on lunch duration. The California Department of Education only requires meals be served between 10 a.m. and 2 p.m., with no minimum seated time.

Reports show sharp disparities: in Los Angeles, students may wait 10–15 minutes in line, leaving fewer than 10 minutes to eat, while smaller districts with staggered schedules provide closer to 25–30 minutes. Parents and advocates have voiced frustration, but without a mandate or reporting system, there is little accountability.

This lack of oversight makes California an ideal candidate for a pilot requiring at least 30 minutes of seated time. With its size, diversity, and history of nutrition reforms, California could model how extended lunch periods improve nutrition, reduce waste, and promote equity.

### III. LITERATURE REVIEW

Extending lunch periods improves both student health and academic outcomes. Burg et al. (2021) found that longer seated times significantly increased consumption of fruits, vegetables, and milk,<sup>9</sup> while Cohen et al. (2016) showed students with at least 25 minutes ate 13 percent more entrées and 12 percent more produce.<sup>6</sup> Adequate time supports healthier diets, lowers risks of obesity and nutrient deficiencies, and is linked to improved concentration, attendance, and test performance.<sup>10</sup> Well-nourished students demonstrate stronger behavior and higher graduation rates, while poor diets are tied to delayed development and reduced earnings. Sufficient lunch time is therefore both a health intervention and an economic investment.

Longer periods also reduce waste. Extending from 20 to 25 minutes cut food waste by 13 percent.<sup>11</sup> Students discard fewer fruits and vegetables, schools save on food and disposal costs, and emissions tied to landfills decline. Extended time also reduces reliance on Ready-to-Eat processed foods, shifting students toward fresher meals and lowering packaging waste.<sup>13</sup>

District reforms illustrate these benefits. Minneapolis Public Schools used staggered schedules to extend eating time without cutting instruction, leading to higher

satisfaction, greater participation, and less waste.<sup>16</sup> In California, 30-minute lunches—especially in low-income districts—boosted free/reduced-price meal participation and reduced hunger-related nurse visits.<sup>8</sup>

Internationally, Finland and Japan provide 30–40 minutes for balanced, communal meals, reporting higher intake, lower waste, and greater satisfaction than U.S. schools.<sup>14</sup> Both countries report lower obesity rates and stronger adherence to nutrition guidelines.

Taken together, U.S. evidence and international practice show that extended lunch is not expendable time but an essential investment in health, sustainability, and equity.

### IV. POLICY ALTERNATIVES

Below are outlined four policy alternatives with interventions in addressing the issues of shortening lunch seating times.

*Policy Alternative 1: Mandate a minimum of 30 minutes for lunch periods, with at least 20 minutes of seated eating time*

Amend NSLP regulations to require a 30-minute lunch period with at least 20 minutes seated. This aligns with CDC recommendations and would guarantee equity nationwide. States could choose implementation methods, but noncompliance would reduce reimbursement eligibility. While administrators may worry about schedules, research shows that better-nourished students perform better academically, offsetting lost instructional time.

*Policy Alternative 2: Require the U.S. Department of Education to collect and report lunch duration data annually*

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*A mandated 30-minute lunch period, with at least 20 minutes seated, would ensure all students can benefit fully from the National School Lunch Program.*

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Require the Department of Education, in collaboration with USDA, to collect and report lunch duration data through existing surveys. Schools would report total period length, seated time, and line wait time, disaggregated by demographics. Though politically feasible, this option does not directly increase time for students; it provides transparency and groundwork for future reforms.

*Policy Alternative 3: Create a federal grant incentive program for schools that extend lunch periods*

Offer grants to schools that voluntarily extend lunch to CDC standards. Funds could support additional staff, staggered schedules, or cafeteria upgrades. Prioritizing Title I schools would target low-income students most in need. Flexible and bipartisan-friendly, this option encourages improvement but leaves participation uneven.

*Policy Alternative 4: require states to set and monitor lunch time minimums in their education codes*

Condition federal reimbursements on states setting their own lunch time minimums. States would incorporate standards into education codes and monitor compliance. This decentralized model respects autonomy and allows for local innovation but risks producing uneven protections across states.

**V. STAKEHOLDER ANALYSIS**

Addressing the issue of inadequate lunch periods involves multiple stakeholders, each with distinct interests, concerns, and levels of influence over the policy’s success. The table below summarizes key stakeholders, their positions, and potential challenges or contributions to policy implementation.

Understanding these varied perspectives can help tailor the proposed policy to address

stakeholder concerns while maximizing its impact on student health and equity.

To compare these alternatives more systematically, the following Comparative Analysis Matrix (CAM) evaluates each option across key dimensions such as effectiveness, cost, political feasibility, equity impact, and stakeholder power.

**VI. POLICY RECOMMENDATION**

*Proposed solution*

This paper recommends a standardized policy requiring all students to have at least 30 minutes for lunch, with 20 minutes seated. This aligns with CDC guidelines and evidence showing benefits for nutrition, academic performance, and sustainability.

*Why this solution is the strongest*

A federal mandate directly addresses poor nutrition, underperformance, and waste by guaranteeing time to eat. Unlike alternatives that depend on voluntary participation or state-by-state standards, a mandate ensures all students—regardless of district resources—receive equitable access. Data collection improves transparency but does not change conditions for students. Grants encourage some districts but leave gaps where capacity is lacking. State-set standards create accountability but risk a patchwork of protections. By contrast, a national baseline complements existing NSLP rules and prevents disparities across states.

Although political feasibility may be lower, the key criterion is whether children can actually eat. On this dimension, the mandate outperforms every other option. Equity, nutrition, and long-term educational success outweigh concerns about scheduling or logistics.



Stakeholder Group	Position	Potential Concerns or Challenges	Role in Policy Implementation
Students	Strong support for longer lunch periods to reduce stress and improve focus.	Limited ability to advocate for policy changes directly.	Can provide testimonials and data on personal experiences.
Parents	Advocate for improved nutrition and well-being for their children.	Concerns about changes to school start or end times.	Can lobby school boards and education agencies for the policy.
Teachers	Mixed opinions: support for student benefits but concerns about impacts on instructional time.	Disruption to lesson plans and potential scheduling conflicts.	Key partners in adjusting daily schedules to accommodate longer lunch periods.
School Administrators	Generally cautious; balancing health benefits with logistical feasibility.	Limited budgets for additional staffing or infrastructure.	Crucial for logistical planning and resource allocation.
Cafeteria Staff	Likely supportive of reducing waste but may face increased workloads.	Need for additional staffing during extended periods.	Can offer insights on optimizing food service to complement extended eating time.
State Education Agencies	Likely supportive due to alignment with public health goals.	Balancing mandates with existing resource constraints.	Responsible for developing guidelines and providing necessary funding.
Advocacy Organizations	Strong support for policies that address food insecurity and promote equity.	Limited influence over individual school districts.	Provide data, research, and community engagement to build support.

Table 2.1

Policy Alternative	Addresses Seated Time Directly	Cost	Political Feasibility	Equity Impact	Stakeholder Power
No Intervention	Low	Low	Moderate	Low	Moderate (district-level autonomy)
Federal mandate	High	High	Moderate	High	Strong federal & advocacy group support
Federal data collection & reporting	Indirect (data only)	Low	High	Moderate	Researchers & advocates gain leverage
Federal grant incentive program	Medium to High	Medium	High	High	Congress, local districts buy-in
State-set minimums	Medium to High	Medium	Moderate	High	Governors/SEAs strong role

Table 2.2

### *Potential for scaling*

California offers an ideal testing ground: it serves over six million students across diverse districts and already leads in nutrition policy with universal free meals. A state-level pilot would generate data and stakeholder support, strengthen feasibility, and provide a model for national adoption. By proving benefits at scale, California can build the case for a uniform federal standard ensuring every child has adequate time to eat.

## **VII. IMPLEMENTING**

### **1. Adjust school schedules**

Work with administrators to stagger lunch periods, extending seated time without reducing instructional hours or overburdening facilities.

### **2. Allocate funding strategically**

Use state and federal programs to hire staff, expand cafeterias, and provide training. Partnerships with advocacy groups can strengthen applications and build community support.

### **3. Engage stakeholders early and often**

Hold sessions with parents, teachers, and community leaders to explain benefits, gather input, and refine strategies for local needs.

### **4. Launch pilot programs**

Test in varied districts to assess feasibility, identify best practices, and collect data on nutrition, participation, and waste.

### **5. Monitor, evaluate, and scale**

Track outcomes on nutrition, academics, waste, and equity. Share results to build momentum for statewide and national adoption.

### *Addressing challenges*

Strategic planning and phased implementation can address scheduling conflicts and

increased staffing needs. For example, introducing the policy in stages allows schools to adapt gradually while building the necessary infrastructure and resources. Encouraging collaboration among stakeholders can further mitigate resistance.

### *Potential benefits*

This policy addresses the root causes of poor nutrition, academic underperformance, and school food waste. By ensuring a minimum of 30 minutes of seated eating time, the initiative supports better dietary habits, reduces waste, and promotes equity, particularly for students in low-income communities.

## **VII. CONCLUSION**

Inadequate school lunch periods are a pressing issue with far-reaching implications for student health, academic success, and environmental sustainability. Establishing a minimum of 30 minutes of seated eating time is a simple yet impactful solution that addresses these challenges comprehensively. The California Department of Education Nutrition Services Division has the opportunity to lead on this issue by implementing a pilot program that could inspire similar policies nationwide. Ensuring adequate time for students to eat is a matter of nutrition, equity, and social justice.

## **ENDNOTES**

1. Ethan A. Bergman, Marilyn Buergel, Tammy Englund, and Barbara Femrite, "The Relationship of Meal and Recess Schedules to Plate Waste in Elementary Schools," *The Journal of Child Nutrition & Management* 28, no. 2 (2004).
2. Katherine Ralston, Constance Newman, Annaliese Clauson, Joanne Guthrie, and Jean Buzby, *The National School Lunch Program: Background, Trends, and Issues*. Economic Research Report No. 61. Washington, DC: U.S. Department of Agriculture, Economic Research Service, 2008.

3. Centers for Disease Control and Prevention (CDC), *Healthy Schools: School Nutrition—School Meals*. Atlanta, GA: U.S. Department of Health and Human Services, 2019. [https://www.cdc.gov/school-nutrition/school-meals/?CDC\\_AAref\\_Val=https://www.cdc.gov/healthyschools/nutrition/schoolmeals.htm](https://www.cdc.gov/school-nutrition/school-meals/?CDC_AAref_Val=https://www.cdc.gov/healthyschools/nutrition/schoolmeals.htm).
4. Emily Patten, Juliana Cohen, and Lindsey Turner, “Do Students Have Enough Time to Eat Lunch? Evidence from a Nationally Representative Sample of School Nutrition Directors,” *Journal of Child Nutrition and Management* 44, no. 2 (2020).
5. C. Byker Shanks, J. Banna, and E. L. Serrano, “Food Waste in the National School Lunch Program 1978–2015: A Systematic Review,” *Journal of the Academy of Nutrition and Dietetics* 117, no. 11 (2017): 1792–1807, <https://doi.org/10.1016/j.jand.2017.06.008>.
6. J. F. W. Cohen, J. L. Jahn, S. Richardson, S. A. Cluggish, E. Parker, and E. B. Rimm, “Amount of Time to Eat Lunch Is Associated with Children’s Selection and Consumption of School Meal Entrée, Fruits, Vegetables, and Milk,” *Journal of the Academy of Nutrition and Dietetics* 116, no. 1 (2016): 123–128, <https://doi.org/10.1016/j.jand.2015.07.019>.
7. Alexa Hoyland, Louise Dye, and Clare Lawton, “A Systematic Review of the Effect of Breakfast on the Cognitive Performance of Children and Adolescents,” *Nutrition Research Reviews* 22, no. 2 (2009): 220–243, <https://doi.org/10.1017/S0954422409990175>.
8. J. F. W. Cohen, A. A. Hecht, G. M. McLoughlin, L. Turner, and M. B. Schwartz, “Universal School Meals and Associations with Student Participation, Attendance, Academic Performance, Diet Quality, Food Security, and Body Mass Index: A Systematic Review,” *Nutrients* 13, no. 3 (2021): 911, <https://doi.org/10.3390/nu13030911>.
9. X. Burg, J. Jarick Metcalfe, B. Ellison, and M. Pflugh Prescott, “Effects of Longer Seated Lunchtime on Food Consumption and Waste in Elementary and Middle School–Age Children: A Randomized Clinical Trial,” *JAMA Network Open* 4, no. 6 (2021): e2114148, <https://doi.org/10.1001/jamanetworkopen.2021.14148>.
10. Michelle D. Florence, Mark Asbridge, and Paul J. Veugelaers, “Diet Quality and Academic Performance,” *Journal of School Health* 78, no. 4 (2008): 209–215, <https://doi.org/10.1111/j.1746-1561.2008.00288.x>.
11. N. Foliard et al., “The Impact of Extended Lunch Periods on Food Waste Reduction in Schools,” *Journal of Food Systems Research* (2021).
12. L. Mahmood, P. Flores-Barrantes, L. A. Moreno, Y. Manios, and E. M. Gonzalez-Gil, “The Influence of Parental Dietary Behaviors and Practices on Children’s Eating Habits,” *Nutrients* 13, no. 4 (2021): 1138, <https://doi.org/10.3390/nu13041138>.
13. A. Sharma, J. Moon, L. Bailey-Davis, and M. Conklin, “Food Choices and Service Evaluation under Time Constraints: The School Lunch Environment,” *International Journal of Contemporary Hospitality Management* 29, no. 12 (2017): 3191–3210, <https://doi.org/10.1108/IJCHM-06-2015-0269>.
14. E. T. Shonkoff, R. E. Goldman, D. N. Margolis, A. E. Potempa, K. Fink, S. Gustus, and M. Stock, “A Mixed-Methods Evaluation of a School Wellness Initiative: An Examination of Longer Lunch Periods and More Physical Activity Opportunities,” *Journal of the Academy of Nutrition and Dietetics* 121, no. 10 (2021): 1961–1974, <https://doi.org/10.1016/j.jand.2021.03.010>.
15. J. L. Slavin and B. Lloyd, “Health Benefits of Fruits and Vegetables,” *Advances in Nutrition* 3, no. 4 (2012): 506–516, <https://doi.org/10.3945/an.112.002154>.
16. The Institute of Politics at Harvard University, “Starved by the Bell,” *Harvard Political Review* (2023), <https://iop.harvard.edu/get-involved/harvard-political-review/starved-bell>.
17. NPR, “Why Processed Food Is Cheaper than Healthier Options,” NPR, March 1, 2013, <https://www.npr.org/2013/03/01/173217143/why-process-food-is-cheaper-than-healthier-options>.
18. U.S. Department of Agriculture (USDA), “Food Waste in Schools and Strategies to Reduce It,” United States Department of Agriculture, n.d., <https://www.usda.gov/foodlossandwaste/schools>.
19. “These Days, School Lunch Hours Are More like 15 Minutes: The Salt,” NPR, December 4, 2013, <https://www.npr.org/sections/thesalt/2013/12/04/248511038/these-days-school-lunch-hours-are-more-like-15-minutes>.
20. L. Freedberg, “California Becomes First State to Offer Free School Meals to All Students,” *EdSource*, July 12, 2021, <https://edsources.org/2021/california-becomes-first-state-to-offer-free-school-meals-to-all-students/657278>.
21. C. Gundersen and J. P. Ziliak, “Food Insecurity and Health Outcomes,” *Health Affairs* 34, no. 11 (2015): 1830–1839, <https://doi.org/10.1377/hlthaff.2015.0645>.
22. Organisation for Economic Co-operation and Development (OECD), *PISA 2015 Results (Volume III): Students’ Well-Being* (Paris: OECD Publishing, 2017), <https://doi.org/10.1787/9789264273856-en>.
23. H. M. Levin and C. R. Belfield, “Educational Interventions to Raise High School Graduation Rates,” *Journal of Education for Students Placed at Risk* 12, no. 2 (2007): 209–224, <https://doi.org/10.1080/10824660701247232>.
24. M. G. Wootan, “Federal Nutrition Standards for School Meals and Snacks: A Victory for Children’s Health,” *Childhood Obesity* 8, no. 4 (2012): 245–247, <https://doi.org/10.1089/chi.2012.8403>.



# Indonesia's Rp72 Trillion Online Lending Debt Crisis: A Policy Framework for Regulating High-Interest Online Loans

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## ABSTRACT:

*Iga Andita Lestari examines Indonesia's surge in high-interest online loan disbursement between 2018 and 2024, finding that inflation, stagnant wages, and unstable employment have driven lower-income and middle-income borrowers toward costly digital credit. To*

*address this, Lestari proposes three policy interventions: disincentivizing predatory fintech lending, promoting low-interest public loan alternatives, and capping digital loan rates. Together, these measures aim to protect vulnerable borrowers, enhance financial inclusion, and stabilize Indonesia's consumer credit market.*

## EXECUTIVE SUMMARY

This article addresses the significant rise in online loan disbursement in Indonesia from 2018 to 2024, primarily driven by economic hardships such as stagnant wages, high inflation, and unstable employment. These factors have disproportionately affected lower- and middle-income groups, deepening their vulnerabilities. Financial technology (fintech) lenders have exacerbated these conditions through predatory practices that target those least able to absorb high-interest debt. To mitigate this, the article proposes three key solutions: disincentivizing predatory practices by digital lenders, promoting alternative low-interest loans, and capping interest rates on digital loans. These measures aim to reduce reliance on costly loans and foster financial stability for vulnerable populations.

## BACKGROUND

Between 2018 and 2024, loan disbursements in Indonesia from online lending platforms with high interest rates increased drastically. The disbursements grew from IDR 22,666 million in 2018 to IDR 925,761 million in 2024,<sup>1</sup> as depicted in Figure 1. This rapid growth suggests a rising dependence on fintech lending, with more consumers turning to high-interest platforms in the absence of affordable credit alternatives. This expansion in digital lending raises concerns about the proliferation of debt traps and broader financial instability.

Researchers Hwang and Tellez, along with Kaffenberger and Chege, observe that digital credit loans are generally smaller in amount, shorter-term, more expensive, and have

higher annualized interest rates compared to traditional consumer loans offered by conventional microfinance institutions.<sup>2,3</sup> This implies that while these loans provide access to credit, they are limited to small sums, must be repaid quickly, and rarely support life-changing investments.<sup>4</sup> This trend raises an important question: why are these high-cost digital loans disproportionately targeted toward and taken up by lower- and middle-income groups?

## WHY DOES FINTECH EASILY TARGET THE LOWER AND MIDDLE CLASS?

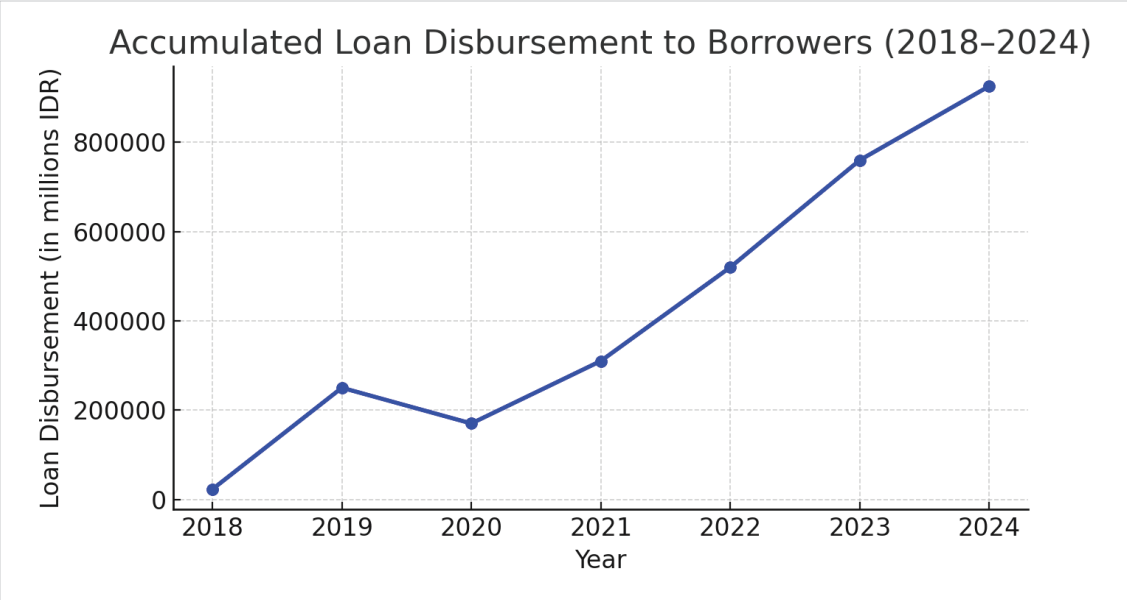
Anthropologist David Graeber's assertion that "consumer debt is the lifeblood of our economy"<sup>5</sup> reflects the reliance of many economies on consumer spending, which is often fueled by borrowing. In essence, the economy thrives when consumers have access to credit, which allows them to purchase goods and services beyond their immediate financial capacity. This debt-fueled demand loop supports production and employment, but it creates long-term systemic risk.

Valentin Schmid critiques this debt-fueled growth model, emphasizing the inherent risk in such a system.<sup>6</sup> When individuals, especially those from vulnerable groups like the youth and low-income earners, are unable to repay their debts, the problem escalates into a broader economic concern. This is because modern financial systems, particularly in advanced economies, rely heavily on the extension and repayment of debt. Schmid's criticism suggests that the fundamental flaw in the financial system lies in its overreliance

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*The financial system effectively traps them in a cycle of dependency, leaving borrowers with little choice but to rely on continual borrowing to meet basic living needs.*

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**Figure 1:** Accumulated loan disbursement to borrowers (2018–2024). Data obtained from Otoritas Jasa Keuangan (OJK).<sup>16</sup>

on debt as both a source of money creation and a driver of economic growth.

Ordinary people are the most affected, often left to at least pay the interest on their loans.<sup>7</sup> The financial system effectively traps them in a cycle of dependency, leaving borrowers with little choice but to rely on continual borrowing to meet basic living needs.

**ECONOMIC GROWTH INDICATORS: LABOR, MINIMUM WAGES, AND INFLATION**

To fully understand the dynamics at play, it is important to consider the three key indicators often used to measure economic growth: (1) labor and job availability, (2) minimum wages, and (3) inflation. High job availability typically indicates a healthy economy, while declining job availability indicates economic distress. Strong minimum wage policies enhance worker welfare, alleviate poverty, and promote more inclusive economic growth. Moderate inflation can stimulate economic activity, but excessive inflation undermines purchasing power.

*Labor and job availability*

High levels of employment and job availability are crucial indicators of a healthy economy. When more jobs are available, individuals can find work, which leads to increased income and consumer spending. Conversely, declining job availability signals economic distress, where unemployment rises and demand falls.

*Minimum wages*

Implementing strong minimum wage policies helps improve worker welfare by ensuring a basic income for the lowest earners. Higher wages reduce poverty levels, increase consumer purchasing power, and stimulate demand, all of which contribute to broader economic growth and stability.

*Inflation*

Moderate inflation is often seen as beneficial to economic growth, as it encourages spending and investment. However, when inflation rises too quickly or becomes excessive, it erodes consumers’ purchasing power and can destabilize the economy. Thus, it is essential to properly manage inflation to sustain long-term economic growth.



Coibion et al. demonstrate how labor availability, minimum wages, and inflation interact to drive economic growth.<sup>8</sup> The study found that increases in wages and higher job availability tend to boost economic activity, reinforcing the importance of maintaining balanced labor markets and inflation policies to sustain long-term growth.

### REGRESSION ANALYSIS INTERPRETATION

To analyze the underlying factors driving the surge in online loan disbursement, a regression analysis was conducted, focusing on employment, wages, and inflation as key predictors.

#### *Employment and loan disbursement:*

**Slope:** 0.0537

**Intercept:** -6,731,187

**R-squared:** 0.9886

The analysis reveals a very strong positive relationship between job availability and loan disbursement. This finding indicates that employment alone does not necessarily correspond to reduced financial strain, as borrowing remains widespread even among the employed. This is supported by a recent empirical study that finds that many *pegawai negeri sipil* (PNS), or government employees, are trapped in debt cycles from online loans.<sup>9</sup>

Given this, it appears that other factors may influence the relationship between employment and borrowing. Thus, a second regression analysis was conducted examining the wage component.

#### *Wages and loan disbursement:*

**Slope:** 1.4509

**Intercept:** -3,796,087

**R-squared:** 0.6604

There is a positive correlation between wage increases and loan disbursement, although the relationship is weaker than that observed with employment. This finding may indicate that rising wages alone are insufficient to meet financial demands, leading to continued reliance on borrowing.

Observational evidence supports this, where many teachers, despite earning regular monthly salaries, report being unable to afford necessities and turning to online loans to bridge income gaps. One teacher shared in May 2024 that “the reason is because teachers have small salaries, but they still have to meet their living needs, such as their children’s needs and others.”<sup>10</sup>

The difficulties in meeting daily expenses and supporting children’s needs might be affected by the inflation rate that is increasing the cost of essential goods and services. To assess this, a third regression was conducted to look at the relationship between inflation rates and loan disbursements.

#### *Inflation and loan disbursement:*

**Slope:** 0.0135

**Intercept:** 10,265,384.06

**R-squared:** 0.9517

There is a strong positive relationship between inflation and loan disbursement, with an R-squared of 95.17 percent. The high R-squared value indicates that inflation explains a large portion of the variance in loan disbursements, meaning inflationary pressures are a major driver of increased borrowing. This suggests that as inflation rises, loan disbursements increase. For every one percent increase in inflation, loan disbursements are predicted to increase by 0.0135 units.

Inflation causes lower- and middle-income classes to struggle in buying daily necessities such as staple foods and groceries, forcing them to borrow to make ends meet. Economist Wahyu Widodo noted that “the cause is the high inflation rate, particularly food inflation in recent years, the large number of layoffs due to pressure in the production sector, and these are important factors.”<sup>11</sup>

This analysis demonstrates that the intersection of low wages and persistent inflation, even with high employment, is a strong driver of reliance on high-interest digital loans.

#### **POLICY ALTERNATIVES TO ADDRESS RELIANCE ON ONLINE LENDING**

The reliance of lower- and middle-income groups on online lending, as measured through key economic factors such as employment, wages, and inflation, highlights significant financial vulnerabilities within these groups. While the analysis shows that increases in loan disbursements correlate with factors like unemployment, stagnant wages, and rising inflation, these relationships indicate that borrowers are often driven to seek online loans as a last resort to meet their financial needs. Given these relationships, targeted policy interventions are urgently needed.

The policy solutions I propose—disincentivizing predatory loan practices, promoting alternative low-interest loans, and capping interest rates and fees on digital loans—are designed to directly address the root causes of this financial instability. By curbing exploitative fintech lending practices, offering affordable and accessible loan alternatives, and limiting the financial burden of high-interest rates, these policies can provide needed financial relief to vulnerable groups, reducing their dependence on costly online

loans and ensuring long-term economic stability. These solutions align with the economic pressures highlighted by employment, wages, and inflation, providing a more sustainable pathway to financial inclusion.

#### ***1. Disincentivize against predatory loan practices carried out by fintech companies through burdensome credit schemes***

The concept of disincentivizing predatory loans involves implementing policies or regulations that make it less profitable or more difficult for fintech companies to engage in harmful lending practices. Predatory loans are typically characterized by high interest rates, hidden fees, and terms that exploit vulnerable borrowers, often trapping them in cycles of debt. Fintech companies, using innovative digital platforms, may be more prone to offering these types of loans due to minimal regulatory oversight in some markets.

Disincentives include enhanced regulatory oversight, increased penalties for noncompliance, and mandatory transparency requirements. These measures aim to reduce the prevalence of unfair lending practices while protecting consumers, particularly those in economically vulnerable positions, from financial exploitation.

A study by Gabor & Brooks discusses the impact of fintech on lending practices and highlights the need for regulatory interventions to prevent predatory lending.<sup>12</sup> The authors argue that without proper oversight, fintech lenders can exacerbate financial inequalities by offering high-cost loans to the most vulnerable populations.

#### ***2. Promote alternative low-interest loans***

Governments, in collaboration with central banks and financial institutions, can promote low-interest, accessible loan alternatives for low- and middle-income borrowers.

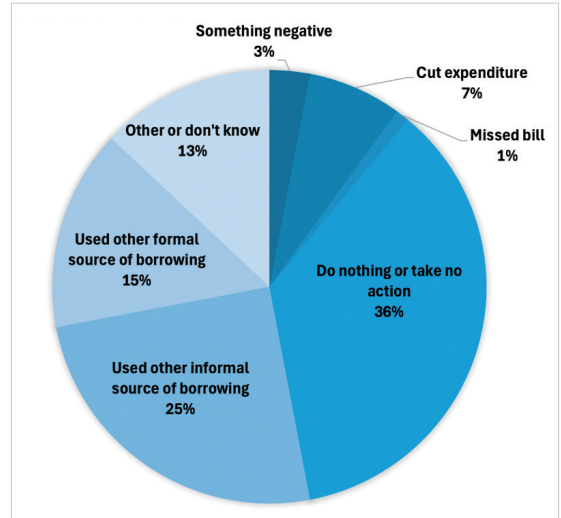
These could include community-based microfinance, credit unions, or government-backed loan schemes. Offering affordable loan products allows borrowers to avoid predatory lenders. This helps reduce the reliance on high-interest online loans that perpetuate financial hardship and provides borrowers with a safer way to access credit.

In India, Microfinance Institutions (MFIs) and government-backed schemes provide affordable loans to underserved populations, promoting financial inclusion without heavy borrowing costs. India's government-backed Micro Units Development and Refinance Agency (MUDRA), launched in 2015, has demonstrated the potential of this approach by providing affordable loans to borrowers, especially low- and middle-income borrowers. The MUDRA Bank provides loans at low interest rates to MFIs and non-banking financial institutions, which then extend credit to small businesses and individuals who lack access to traditional banking services. This initiative has significantly increased financial inclusion, enabling low-income entrepreneurs to access credit at more affordable rates, thus reducing their reliance on predatory lenders and helping to alleviate financial hardship.

Moreover, Self-Help Groups in India, often supported by MFIs, have also played a critical role in providing low-interest loans to marginalized communities, particularly women in rural areas. These groups enable individuals to borrow small amounts at affordable rates while fostering community-based support systems, ensuring higher loan repayment rates and promoting financial stability.<sup>13</sup>

### 3. Cap interest rates and fees on digital loans

Governments can impose caps on the interest rates and fees that online lenders can charge. This ensures that borrowers are not burdened with high repayments that they



**Figure 2:** Reaction to the declined HCST credit facilities

**Description:** Figure 2 plots the answer to the following survey question: *When you were unable to get a payday loan on this occasion, what did you do?*

cannot afford. Several European countries, including the United Kingdom, France and Germany, have strict caps on interest rates to prevent predatory lending practices. Research by Ferrari et al. found that the UK's cap on high-cost short-term (HCST) loans resulted in a 50 percent contraction of the HCST credit market between the first half of the implementation year (2014–2015).<sup>14</sup> Though the revenue of the company that provides the HCST dropped significantly, there was little impact on the broader financial system of the United Kingdom.

The study also shows that after the cap, the group of people that applied for a loan but were declined were people that were unemployed, low-income, or too young. Figure 2 illustrates borrower responses after being declined loans. Among this group, 40 percent of people reacted, and of the group, only three percent reported negative effects.<sup>15</sup> Furthermore, only one percent reported cutting bills.



## CONCLUSION

The large rise in online loan disbursement, particularly among lower- and middle-income groups, is driven by economic vulnerabilities, including high inflation, stagnant wages, and unstable employment. The analysis shows that these groups are more likely to turn to high-interest digital loans to cover essential expenses, which only exacerbates their financial instability. These patterns reveal an urgent need for regulatory and structural interventions to safeguard vulnerable borrowers.

The proposed policy solutions—disincentivizing predatory fintech lending practices, promoting alternative low-interest loans, and capping interest rates—target the root causes of this reliance on burdensome loans. By implementing these measures, the government can protect financially vulnerable populations from exploitative lending, provide affordable credit alternatives, and foster sustainable financial inclusion. These policies not only reduce the risks associated with online lending but also help improve the overall economic resilience of lower- and middle-income groups, offering them a path toward financial stability.

## ENDNOTES

1. Otoritas Jasa Keuangan (OJK). Data dan Statistik: Fintech. <https://ojk.go.id/id/kanal/iknb/data-dan-statistik/fintech/default.aspx>
2. Ibid.
3. Hwang, Byoung-Hwa, and Camilo Telliez. *The Proliferation of Digital Credit Deployments*. Washington, D.C.: CGAP/World Bank, March 2016. <https://documents1.worldbank.org/curated/en/830661467994632311/pdf/106035-BRIPUBLIC-KNOWLEDGE-NOTE-Brief-Proliferation-of-Digital-Credit-DeploymentsMar%202016-1.pdf>
4. Kaffenberger, Michelle, and Edoardo Totolo. "A Digital Credit Revolution: Insights from Borrowers in Kenya and Tanzania." Working Paper. Washington, D.C.: CGAP, October 2018. <https://www.cgap.org/sites/default/files/publications/Working-Paper-A-Digital-Credit-Revolution-Oct-2018.pdf>
5. Njathi, Anne Wangari. "The Effects of Mobile Lending Apps on Bottom of the Pyramid Consumers in Kenya: A Case of Tala FinTech Company." *Journal of African Interdisciplinary Studies* 3, no. 8 (2019): 112-126. [https://www.academia.edu/43786447/The\\_Effects\\_of\\_Mobile\\_Lending\\_Apps\\_on\\_Bottom\\_of\\_the\\_Pyramid\\_Consumers\\_in\\_Kenya\\_A\\_Case\\_of\\_Tala\\_FinTech\\_Company](https://www.academia.edu/43786447/The_Effects_of_Mobile_Lending_Apps_on_Bottom_of_the_Pyramid_Consumers_in_Kenya_A_Case_of_Tala_FinTech_Company)
6. Graeber, David. *Debt: The First 5,000 Years*. Brooklyn, NY: Melville House, 2011.
7. Schmid, Valentin. "The Life Blood of Our Economy." *The Epoch Times*, July 29, 2014. <https://www.theepochtimes.com/article/the-life-blood-of-our-economy-824693>
8. Njathi, Anne Wangari. "The Effects of Mobile Lending Apps on Bottom of the Pyramid Consumers in Kenya: A Case of Tala FinTech Company." *Journal of African Interdisciplinary Studies* 3, no. 8 (2019): 112-126. [https://www.academia.edu/43786447/The\\_Effects\\_of\\_Mobile\\_Lending\\_Apps\\_on\\_Bottom\\_of\\_the\\_Pyramid\\_Consumers\\_in\\_Kenya\\_A\\_Case\\_of\\_Tala\\_FinTech\\_Company](https://www.academia.edu/43786447/The_Effects_of_Mobile_Lending_Apps_on_Bottom_of_the_Pyramid_Consumers_in_Kenya_A_Case_of_Tala_FinTech_Company)
9. Coibion, Olivier, Yuriy Gorodnichenko, and Lorenz Kueng. "Labor Market Dynamics and Inflation." *American Economic Review* 107, no. 5 (2017): 101-105.
10. KOMPAS. "19 PNS di Lumajang Terjerat Pinjol, Terungkap Karena Indisipliner." *August 1, 2024*. <https://surabaya.kompas.com/read/2024/08/01/141022078/19-pns-di-lumajang-terjerat-pinjol-terungkap-karena-indisipliner>
11. Bisnis. "Alasan Guru Banyak Terjerat Pinjol Ilegal, Gaji Kecil Hingga Kurang Literasi Keuangan." *Bisnis.com*, May 20 2024. <https://finansial.bisnis.com/read/20240520/563/1766901/alasan-guru-banyak-terjerat-pinjol-ilegal-gaji-kecil-hingga-kurang-literasi-keuangan>
12. CNBC Indonesia. "Kelas Menengah Nyerah, Jatuh ke Miskin dan Butuh Insentif." *CNBC Indonesia*, July 26, 2024. <https://www.cnbcindonesia.com/news/20240726101934-4-557810/kelas-menengah-nyerah-jatuh-miskin-dan-butuh-insentif>
13. Gabor, Daniela, and Sally Brooks. "The Digital Revolution in Financial Inclusion: International Development in the Fintech Era." *New Political Economy* 22, no. 4 (2017): 423-436. <https://doi.org/10.1080/13563467.2017.1259298>

14. Isern, Jennifer; L. B. Prakash; Anuradha Pillai; and Syed Hashemi. Sustainability of Self-Help Groups in India: Two Analyses. Occasional Paper No. 12. Washington, D.C.: Consultative Group to Assist the Poor (CGAP) / The World Bank, August 2007. <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/311061468259465347/sustainability-of-self-help-groups-in-india-two-analyses>
15. Ferrari, Alberto, Olivia Masetti, and John Ren. Interest Rate Caps: The Theory and the Practice. Policy Research Working Paper No. 8398. Washington, D.C.: World Bank, 2018. <https://openknowledge.worldbank.org/server/api/core/bitstreams/db52e3ae-519a-587d-94b8-a40fd69d822/content>
16. Financial Conduct Authority. Price Cap Research: Summary Report. London: Financial Conduct Authority, June 16 2017. <https://www.fca.org.uk/publication/research/price-cap-research.pdf>

# Understanding Barriers to Implementing Municipal Zoning Reforms

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## ABSTRACT:

*Municipal zoning has contributed to the housing crisis California faces today. This report discusses the barriers to reforming municipal zoning in California using interviews with current advocates and experts in the space.*

*The authors find that a wide variety of strategies may be effective to reduce barriers, including advocating for incrementalism, building coalitions, and focusing on reducing costs to building new housing.*



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## INTRODUCTION

California's housing crisis is best described as a myriad of intersecting crises, each impacting different communities in unique manners. The common thread across these individual crises, from unsheltered homelessness to teacher shortages, is a lack of housing that people can afford in the places where they want to live. For decades, California has failed to build enough housing of all types to keep up with its growing population, leading to higher rents, more homelessness, lengthier commutes, and the displacement of communities. Since 2010, California has built fewer than 100,000 new housing units per year, far short of the Newsom administration's goal of 315,000 units per year.<sup>1</sup> Several barriers to housing production have contributed to the present shortage, including restrictive zoning designations, strict building codes, lengthy environmental reviews, high hard costs for land, materials, and labor, and community opposition to new development, among others.

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Increasing the housing supply alone will not solve every aspect of "the housing crisis," but it is a necessary first step. California is especially lacking housing that is affordable for low-income residents, but producing housing of all types is necessary. Research on the impacts of market-rate development on neighborhood affordability is limited, but a

meta-analysis from the UCLA Lewis Center suggests that the construction of new market rate developments is associated with a fall in nearby rent prices.<sup>2</sup> This article focuses specifically on zoning reform as an attainable part of the solution to California's housing crisis, one which can facilitate increased production

of all types of housing. It first offers a historical grounding before exploring potential mechanisms of, barriers to, and strategies for implementing zoning reform. The content is informed by a series of qualitative interviews that took place between November and December 2024.

## A BRIEF HISTORY OF ZONING

While this paper focuses on how zoning regulations can encourage increased housing production, the historical impetus for

zoning was the opposite: in the early 20th century, zoning was used as a mechanism to prevent multi-family construction and enforce racial segregation in American cities.

The first instance of racially restrictive zoning came in 1910, when Baltimore implemented a zoning ordinance that delineated separate neighborhoods for White and Black households.<sup>3</sup> However, after a spate of Southern cities imitated Baltimore with their own race-based zoning regulations, the Supreme Court struck down Louisville's ordinance in 1917 in *Buchanan v. Warley* on the grounds that racial zoning imposed an unfair burden on property owners by restricting their freedom to sell to whomever they pleased. Despite this decision, Atlanta and other Southern cities continued the practice of zoning as a means of racial exclusion, using other levers that did not explicitly mention race.

Chief among these levers was the implementation of single family zoning (SFZ). SFZ expressly prohibited the construction of multi-unit buildings, which were more affordable and thus accessible to poorer families. Under this new zoning regime, middle-class residential districts could more easily exclude low-income residents. Notably, Berkeley was the first community to implement SFZ in its Elmwood neighborhood in 1916, as the developer advocating for the restriction aimed to prevent a Black-owned dance hall from moving into a block of homes he was attempting to sell.<sup>4</sup>

The principal reason zoning was able to perpetuate racial segregation following *Buchanan v. Warley* was due to the discriminatory mortgage lending practices of federal programs like the Federal Housing Authority (FHA). While detached single family homes were similarly cost-prohibitive for poor white and Black families, white families were

able to access mortgages because the FHA would insure the banks' loans. Through the FHA's *de jure* discrimination, SFZ became a policy lever to reinforce racial segregation in American cities.

One subject interviewed for this article posited that zoning has not been an effective means to increase housing production because it has historically been a "politics of no." However, zoning regulation has experienced a paradigm shift in the 21st century: now, zoning reforms are geared towards increasing density. Furthermore, inclusionary zoning is a tool to promote cohabitation of different economic strata and create more equitable neighborhoods.

## THE PROMISE OF ZONING

Zoning reform will not boost housing production in isolation, but it is an important initial step to address barriers to construction. One interviewee shared that "nothing matters until you fix the zoning code," noting that appropriate housing cannot be permitted, let alone built, until a parcel is properly zoned. As statewide land use reforms have been enacted in California in recent years, the same source explained that the relative importance of zoning as a barrier has waned leaving hard costs as the largest barrier to housing construction. However, changes to the zoning code can help new developments to pencil out: aspects of current zoning codes such as parking minimums "reduce the margin of error on every other front," adding costs on top of exorbitant land prices and expensive construction materials.

It is important to focus on zoning reform because the legacies of exclusionary practices of the early 20th century still live on in the zoning regulations of many municipalities. When zoning codes prohibit the construc-

tion of dense housing or make such development less financially feasible, they continue the tradition of economic exclusion rooted in racism and exacerbate California's housing crisis. Because restrictive zoning is the first barrier to housing construction, zoning reform is the first, and often most cost-effective, lever to allow more housing supply. More active interventions such as infrastructure investments or housing bonds have high costs, making zoning an easier first step for municipalities looking to increase housing supply.

Principal among the reforms working within the current paradigm is the elimination of restrictive single family zoning, or "wholesale density changes," which allows parcels that are restricted to one unit to instead be able to contain several units by-right. The most visible example of a wholesale density change is the proliferation of accessory dwelling units (ADUs) throughout California over the last eight years. Senate Bill 9 (2022), the California Housing Opportunity and More Efficiency (HOME) Act, represents the next step in the expansion of wholesale density changes by allowing homeowners to subdivide their lots and build up to four units on a single parcel.<sup>5</sup> Similar to 1982 ADU legislation, the California HOME Act is an initial step; there are still issues to be resolved with permitting, varying regulations imposed by municipalities, and residency requirements. However, it represents progress by facilitating an up to four-fold increase in density on single family-zoned parcels.

Streamlining the permit approval process is another crucial element of zoning reform. One of the major areas of focus in this regard is shifting more zoning reviews to by-right approvals, thereby reducing the amount of time and uncertainty involved in the development of new housing units. By-right

approvals dovetail with implementing set approval timelines for different permits, which reduces barriers to housing production for property owners and commercial developers alike. The faster approval timelines brought about by these adjustments accelerate construction timelines, reducing uncertainty and costs around new developments.

The third key zoning reform is the elimination of minimum parking requirements, particularly near public transportation. A city planner interviewed for this article stated that the elimination of minimum parking requirements was the single most effective zoning change to bolster new housing construction in their city. Eliminating parking requirements is useful for developers because it lowers the hard cost of development, facilitating construction where it might have otherwise been cost-prohibitive. Additionally, this zoning reform represents a shift away from a car-centric California culture, choosing to encourage public transit usage and thereby promoting greater environmental sustainability.

Historically, cities have had full control over their zoning codes, but this is changing. With some cities resistant to increasing density, the state is stepping in to solve the collective action problem. In the past decade, state lawmakers have become increasingly willing to pass legislation that mandates zoning reforms, wrestling some aspects of zoning away from cities. This tension between statewide zoning reforms and local control will continue to play out as California struggles to solve its housing crisis.



**BARRIERS AND STRATEGIES**

The three main barriers to pro-density zoning reforms identified in the qualitative research were California’s regulatory environment, political will at the community level, and municipal staff technical capacity and resources. While the regulatory environment, namely the California Environmental Quality Act (CEQA), was partially reformed by the Legislature in 2025, the problems at the local level are still very pertinent. In addition to exploring the perspectives of our interviewees around political will and municipal staff, this section identifies a set of strategies for housing advocates to advance zoning reform at the local level.

**POLITICAL WILL**

When asked about the principal barrier to implementing zoning reforms in cities in California, many interviewees agreed that political will was the top concern. Interviewees recalled their experiences encountering opposition from community members, planning staff, or council members at different times. It is important to develop strategies to overcome the collective action problem that stems from a regional issue needing to be addressed at the local level, increase awareness of zoning reforms, foster political demand for more housing, and align the priorities of the full community with those of the planning staff and city council.

Democratizing community engagement around general plan and zoning updates is

essential to truly understanding community sentiments. Many interviewees mentioned that only those with the time to attend public forums have their voices heard. These individuals were likely to be civically engaged homeowners with a status quo bias, and their perspectives often differed from the community as a whole. As a result, city council meetings take the shape of a “vetocracy,” with unanimously negative public comment for any proposed innovative zoning reform. One interviewee discussed the need for dissenting opinions in public comments, as they remove the perception of unanimous opposition to zoning reforms

and create opportunities for compromise.

More in-depth community engagement helps to differentiate NIM-BY-based anti-density sentiment from legitimate concerns over gentrification, displacement or environmental degradation. In this regard, council

members should learn from Minneapolis, where the city designed a unique community engagement strategy for its general plan that focused on gathering perspectives from historically disenfranchised communities.<sup>6</sup> While this upset traditionally over-represented groups, it resulted in a general plan that better aligned with the values of the full community.

Another way to change public opinion around zoning is by building diverse coalitions of stakeholders with differing goals but common interests. Some of the zoning

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reforms mentioned earlier focus on moving away from a car-centric culture, opening the door for housing and environmental advocates to unite in support of eliminating parking minimums. Berkeley, which has a long history of opposition to dense housing, is a prime example of how diverse coalitions can shift the political landscape. Over time, housing advocates allied with environmental groups, formed connections inside city hall, and eventually pushed the city council to embrace zoning reforms that promoted density.

Incremental policy changes are less disruptive to the status quo and can help alleviate fears of changing neighborhood character often associated with innovative zoning reforms. A planner from one city that found success eliminating parking minimums noted that initial community backlash was assuaged by implementing reforms in phases rather than all at once. Using small steps to gradually dispel the status quo biases of hesitant community and council members should be embraced by pro-housing advocates, even if it seemingly results in a slower pace of change.

Finally, the state can use incentives or mandates to shift local priorities and provide political cover for city officials. One example is the California Prohousing Designation (CAPD), which provides exclusive funding and preferential access to non-housing funding sources for cities that meet a threshold of pro-housing measures.<sup>7</sup> One interviewee said that while the current iteration is too weak, a higher threshold and more preferential access to non-housing funds could push cities to adopt more innovative zoning reforms that they would otherwise not. Alternatively, the state is able to mandate zoning code changes through legislative action, such as with ADU reform.

However, one interviewee shared that more moderate state legislators may be hesitant to fully embrace the state preemption of local control of zoning due to fears of political backlash.

### STAFF TECHNICAL CAPACITY AND RESOURCES

Advancing zoning reform in the ways laid out above requires substantial staff time, resources, and expertise. However, planning departments are already understaffed and are often asked to do too much. As one city planner said, “council may ask staff to do years of research and go back and forth analyzing a policy, so is the issue staff capacity or demands of staff?” Given the severe budgetary constraints facing many California cities, maintaining a large and skilled enough staff to both carry out the day-to-day operations of the planning department and engage in a thoughtful long-range planning process is a major challenge. This is particularly a problem for smaller cities throughout the state, who often have to hire outside consultants to perform much of the minutiae of planning due to limited resources. There are wide-ranging consequences to planning departments being under resourced, such as longer timelines for issuing permits and project approvals, lack of cross-departmental and cross-jurisdiction coordination, and insufficient time available for community engagement.

As the state has imposed its authority over land use decisions and passed more laws preempting local control in certain cases, it has created inconsistencies with local codes. Cities have a hard time keeping up, which eats up staff time and causes confusion for developers. For example, at the end of the annual legislative cycle, City of Berkeley planning staff devote a significant number of hours preparing a package of amendments

called the “State Law and Technical Edits” (SLATE) that includes all the changes to the zoning code required to come into compliance with new state laws.

## STRATEGIES FOR HOUSING ADVOCATES

### *Embrace incrementalism*

- ADU legislation was slowly developed between 1982 and 2016 before becoming effective. Speak with supportive city councilmembers to understand where they can close loopholes in SB 9 to increase uptake and help create a state-wide industry similar to what occurred after ADU reform.
- Work with lawmakers to bolster the California Prohousing Designation in order to make it a more effective tool for pushing cities to adopt zoning reforms.
- Incrementalism also helps at the community level to assuage political opposition to zoning reforms. Start small with potential zoning reforms and then push for more impactful policies once the effects of the initial policy are well-understood.

### *Advocate for solutions that streamline processes and reduce costs*

- Reforms that set timelines, streamline processes, and reduce costs are all builder-friendly amendments to zoning codes that should be embraced by advocates.
- It is tempting to push for concessions from developers that will advance other important local priorities such as strict labor or environmental standards, but these concessions raise costs and can discourage housing construction.
- For wholesale density changes to have a similar impact as the ADU reform, property owners and developers need

to be provided certainty about what is allowable.

### *Build diverse coalitions*

- Building broad coalitions has been shown to shift the political landscape by convincing elected officials to take on more pro-housing stances or electing new ones that will.
- Not all opponents of increased housing production are NIMBYs. Actively seek out opportunities to partner with tenants’ rights and environmental advocates and identify specific policies that align with each group’s priorities.
- Educate your community about the potential benefits of zoning reform, meet people where they are, and be willing to engage honestly with those you see as opponents.

### *Attend public forums*

- Simply showing up to city meetings about potential projects or zoning updates is the first, and perhaps most important action housing advocates can take.
- Several interviewees explained the political importance to council members of there being vocal support for a project or policy. It is easy for them to make a contentious decision if there are at least a handful of voices aligned with their position.

### *Leverage your expertise*

- Help local electeds and planning staff understand potential opportunities for funding and changes brought by state land use legislation. Interviewees across multiple cities mentioned looking to local organizations and advocates as sources of information, including one



example of a pro-housing advocate and artist who creates infographics explaining the impact of various new statewide housing and land use policies that are frequently referenced in staff reports.

- This can be a powerful way to build long-term credibility as an advocacy organization, while also contributing to effective implementation of pro-housing legislation in the short-term.

### *Organize statewide*

- Many of the barriers discussed in this report can be addressed at the state level and some even require a statewide response. Coordinate with other local housing advocates across the state and build relationships with the offices of your state representatives in order to advance legislation that incentivizes or mandates municipal zoning reforms.

Christopher, Ben, and Matthew Tobias. "Californians: Here's Why Your Housing Costs Are So High in 2024." *CalMatters*, October 15, 2024. <https://calmatters.org/explainers/california-housing-costs-explainer/>.

Dubler, Michael. *California Senate Bill 9: An Important Symbolic Victory That Is Unlikely To Produce Meaningful Amounts Of New Housing In Single-Family Neighborhoods*. Report. Los Angeles, CA: University of California, Los Angeles, 2022.

Minneapolis 2040. *Planning Process*. n.d. <https://minneapolis2040.com/planning-process/>.

Phillips, Shane, Michael Manville, and Michael Lens. "Research Roundup: The Effect of Market-Rate Development on Neighborhood Rents." *Lewis Center for Regional Policy Studies*, 2021.

Rothstein, Richard. *The Color of Law: A Forgotten History of How Our Government Segregated America*. New York: Liveright Publishing, 2017.

## ENDNOTES

1. Christopher and Tobias, *Californians: Here's why your housing costs are so high in 2024*
2. Phillips et al, *The Effect of Market-Rate Development on Neighborhood Rents*
3. Rothstein, *The Color of Law*
4. Baldassari & Solomon, *The racist history of single-family home zoning*
5. Dubler, *California Senate Bill 9*
6. Minneapolis 2040, *Planning Process*
7. California Department of Housing and Community Development, *Prohousing Designation Program*

## REFERENCES

Baldassari, Erin, and Molly Solomon. "The Racist History of Single-Family Home Zoning." *KQED*, October 5, 2020. <https://www.kqed.org/news/11840548/the-racist-history-of-single-family-home-zoning>.

California Department of Housing and Community Development. *Prohousing Designation Program*. n.d. <https://www.hcd.ca.gov/planning-and-community-development/prohousing-designation-program>.

# Clarity and Courage: Marion Nestle's Perspective on Federal Food Politics in Trump 2.0

*Interview by Max Dunsker, Amanda Fong, and Kirsta Hackmeier*

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*Photo by  
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*Marion Nestle is the country's leading expert on the role that politics play in what and how America eats. Since publishing her paradigm-shifting book *Food Politics* in 2002, Nestle has continued to shed light on how food companies shape nutrition policy at the state, local, and national level.*

*She is the Paulette Goddard Professor of Nutrition, Food Studies, and Public Health, Emerita, at New York University and Visiting Professor of Nutritional Sciences at Cornell. She received a Ph.D. in molecular biology and Master of Public Health from the University of California, Berkeley.*

*The Journal interviewed Nestle in April 2025, in the early days of the second Trump administration, as nutrition and chronic illness issues were gaining visibility under Secretary of Health and Human Services Robert F. Kennedy Jr.*

**Berkeley Public Policy Journal (BPPJ):** You've dedicated your career to educating the public by documenting the complexities of the food system and the relationships between the food industry and politics. If you could sum it up, what is your goal with your teaching and writing?

**Marion Nestle (MN):** Clarity. I'll put it in one word: clarity. What impressed me so much about nutrition teaching and nutrition research was how obfuscated it was. People were not saying things very clearly. And so I've always strived to be crystal clear and extremely well documented in anything that I say.

And I had something that I want to point out that other people didn't seem to be saying, which was that food companies are not social service agencies. They're businesses with stockholders to please, and eating less is very bad for business. And that explains a lot about the food environment.

**BPPJ:** We are moving into a new political climate, and it's too soon to say exactly what actions will be taken, but what leading indicators are you looking at to suggest the direction that national food politics are headed in the U.S. under this new administration?

**MN:** I'm very excited by the Make America Healthy Again (MAHA) movement. I think its heart is in the right place. It is certainly identifying the problems in a way that I have never seen identified at a federal level before. Much of [MAHA] focused on 75 percent of American adults being overweight or obese, and the consequences of that. That to me is absolutely thrilling. With that said, what the MAHA movement is actually going to do remains to be seen. So far, we know that it's very interested in getting color additives out of the food supply. Let me be very clear about this. I'm in favor of getting artificial additives out of the food supply. I just don't think it's the most important issue. And I don't think it's an issue that's going to address obesity and chronic disease. The second thing that Robert F. Kennedy Jr. (RFK Jr.) has said he wants to do is clean up the Generally Recognized As Safe (GRAS) loophole, which allows food companies to self-declare which additives are safe. Again, I'm absolutely in favor of that. I just don't think it's going to address the problem.



And then RFK Jr. says he wants to get ultra processed foods out of schools. Now we're talking! We know that ultra processed foods encourage people to eat more. They are a specific category of junk foods that have an enormous amount of research behind them. And the one thing that has been absolutely shown is that they encourage people to eat more. You can't eat just one. You can't stop eating them, so people who eat a lot of ultra processed foods take in more calories.

In order to do this, the MAHA movement is going to have to take on the food industry. I see no signs that anybody is very interested in doing that, except for with color additives. But color additives are an easy one in public health terms, they're low hanging fruit, because the food industry already has plenty of alternatives. The alternatives cost a little bit more and they don't work quite as well, but they've got alternatives. They use them in other countries where these additives are banned or have to have warning labels on them.

I want to see them take on obesity as a problem. If they're going to really take it on, they have to deal with overconsumption of calories. They have to be arguing for people to eat less. That means smaller portions, not eating a lot of ultra processed foods. And the way our economic system works, eating less is very bad for business. Very bad. So I don't know what he's going to do about that. It remains to be seen.

**BPPJ:** It also seems that the MAHA movement is currently clashing with some of what the USDA is doing. For example, the USDA has canceled local food purchasing programs that are sending money to schools to buy local produce and that appears to be counter to the Make America Healthy Again movement.

**MN:** You would certainly think so. Much of what RFK Jr. wants to do involves changing programs in the U.S. Department of Agriculture, but he's not Secretary of Agriculture. Brooke Rollins is. And although Rollins is saying that she's going to cooperate with the Secretary of Health and Human Services, one of the first things she did was to cut the farm-to-school program. What was particularly shocking about that is that that program is a win-win. It's really good for local farmers and it's really good for schools. To have that as one of the first things cut, when it's a tiny program, a rounding error in the Department of Agriculture's budget, makes you wonder how this is all going to play out. And it makes me not very optimistic about the cooperation between agriculture and health and human services.

Some of the other things that are on the agenda are to get sugar-sweetened beverages out of SNAP, the Supplemental Nutrition Assistance Program. I think that doing that as a pilot is not a bad idea. I certainly am on record as saying we should run pilot studies and see how people react. I'm very well aware that it's extremely controversial and has a curious alignment of people for it and against it, but when I wrote *Soda Politics*, I got letters from people saying "I was on SNAP and I saw SNAP dollars as an incentive to buy sugar-sweetened beverages. Soda costs less because it's not taxed, and it's like free money. I wouldn't buy it with my own money, but I buy it with SNAP dollars."

In previous years, the U.S. Department of Agriculture has turned down state applications for a waiver to pilot that project. Brooke Rollins has said that she'll consider it. So we'll see what happens.

**BPPJ:** Within HHS and USDA, there's this issue of regulatory capture and the influences of the food industry laced throughout a lot



of what the administration does. How are you thinking about the tension between the incentives of the government and the incentives of industry?

**MN:** Let's talk about the interdepartmental tension first. Usually there's a firewall between those agencies. But RFK Jr. strikes me as someone who, certainly at the beginning, was not very well informed about his agency's purview. Many of the things that he said he was going to do were mandates of the Department of Agriculture or other agencies. I liked what he was saying about getting the toxic chemicals out of the food supply. I'm greatly in favor of doing that. He particularly mentioned that he'd like to get the toxins out of fish. He's talking about methylmercury, which comes from coal burning power plants. And for decades, presidents have tried to get coal burning power plants to clean up their emissions and they've never succeeded. And he can't take on coal burning power plants from the Department of Health and Human Services. That's an EPA function. And what is the EPA doing? It is not tightening up its restrictions on chemical emissions. So we have a lot of contradictory conversations going on and it's very difficult to know what counts. The one thing that has been absolutely forceful has been the artificial color additives. Fine. I'm totally in favor, but that's not enough.

RFK Jr. has said that he wants to get conflicts of interest out of the agencies within Health and Human Services. That means the FDA in particular. The FDA is rife with conflicts of interest, particularly the revolving door where people from industry go work for the FDA and people from FDA go work for industry. There are many examples of that, too many to mention. It would be nice if they could do something about that. For example, that you can't work for an

industry that you regulated for five years, or something like that. It's currently a year or two. That's not nearly enough. But again, the talk was really good, but what is the action going to be?

**BPPJ:** If the federal government isn't moving fair food policies forward, what are some successful or effective alternative models, like grassroots movements or local initiatives, that could help reshape the food system?

**MN:** You asked about efforts that have worked. The Berkeley soda tax is the example that I use of successful food advocacy because the Berkeley soda tax was done by a community group that did advocacy, as I would put it, by the book. There is a book. It's called *Organizing for Social Change: Midwest Academy Manual for Activists*. And the soda tax was done by enormously experienced community organizers who knew how to go about it and what was needed. It was an extraordinarily diverse group that represented every facet of Berkeley, from the flats all the way up to the top of the hill. And they organized in every single community, going door-to-door asking, "Does anybody in your family have type two diabetes? Do you know about the relationship between sugar sweetened beverages and type two diabetes?" And then they made promises about how the money would be used. Also, people in Berkeley had enough experience with the City Council to believe them when they said they would use the funds for community purposes. And there was Bloomberg funding. These were all big factors.

And the soda industry made a terrible mistake. Even though they had poured millions of dollars into this, they wrapped the BART stations in "No on Measure D" signage. That's why there was a vote of 76 percent in favor of the tax.

**BPPJ:** Outside of government policy, have you seen traction from other grassroots movements or alternative models, for example public-private partnerships or cooperative models?

**MN:** There are examples, but I'm not enormously familiar with them. What I worry about is that there are thousands of community organizations working on food issues. They are not in any way organized into coalitions, except for the coalition of anti-hunger. That's Feeding America, but Feeding America is corporate. We don't have a very active civil society in the United States right now. Whether the Trump administration will be an incentive for that remains to be seen. There were demonstrations all over the place a couple of days ago, but they didn't really have an agenda. They certainly didn't have any kind of coordinated policy agenda, other than "let's get rid of them."

It reminds me a lot of the Occupy Movement, which was enormously successful in getting attention, but didn't have an agenda. If you're going to achieve goals, you've got to have goals. And methods for achieving those goals. So I try to teach advocacy whenever I can. I try to get everybody to read the Midwest Academy's book, which I think is fantastic, because it works. And it's a different kind of public policy than what's taught at the Goldman School. But it's still advocacy and it's still achieving goals. I think it's really useful. If I were teaching at the Goldman School now, that's what I'd be teaching.

**BPPJ:** Most of our readership is current policy students, recent policy graduates, and other Goldman alumni. As someone who is considered very influential in their field, what strategies would you recommend to policy students in order to have an impact during their careers?

**MN:** You have to have a goal for what you want. Policy analysis is fine, and it's useful. But what are you using it for? You have to have a goal and be really clear about what that goal is. When I taught classes in advocacy, I was surprised by how difficult it was for students to define goals. The exercises would ask "You want to end hunger? How are you going to do that? You want to prevent obesity. How are you going to do that?" And then try to build to something more specific.

Some goals are easier than others. Getting more money for SNAP would be a very tangible, easy to define goal. Then you have to figure out how to encourage Congress to give more money for SNAP. And you would know very easily whether you achieved that goal or not, and you could go back and refine it. But for a lot of other things, it's really difficult. Students would spend half the semester trying to figure out what they wanted to do, what they wanted to advocate for. You have to figure out who is going to facilitate, how to reach that person, how to use the political system. Students don't like politics. It's dirty. And then there's no money in advocacy. A big problem for people who want to do advocacy is how are they going to get paid for it? Lobbyists have no problem. Lobbyists get paid very well by the corporations that hire them. They know exactly what they're supposed to do and exactly how to do it, and they are very successful. But if you're going to be advocating for social change or for political change, you've got to be paid to do it or you have to have a message that's so charismatic that you develop an enormous following. I would say Trump is a community organizer and is brilliant at it.

I'm trained in public health. We have a course called Public Health Planning and Evaluation, which is the public health ver-

sion of policy analysis. It's exactly the same, except it's focused on wicked problems. If you don't work on wicked problems, those problems are never going to get solved, and they're the ones that count. And you have to involve politics because you're not going to get anything done if you don't.

You identify a problem. You try to think up a way to solve that problem. You recruit allies to help you. You figure out who or what is going to make the change you want, and you address your tactics and strategies to make that happen. And if you're not doing that, you're not doing your job.

**BPPJ:** Have there been any stances on food politics or approaches that you would do differently or that you've changed your mind about?

**MN:** I told you there was a trajectory from nutrition to foods to diets to food systems. I didn't intentionally become an advocate. When I wrote my book *Food Politics*, I thought I was describing the obvious but that nobody else was talking about it.

I had some motives for writing *Food Politics*. It was upsetting to go to meetings on childhood obesity in which speaker after speaker would talk in distress about "How are we going to convince moms to feed their kids better?" I was just appalled by that. Why wasn't anybody talking about "How are we going to get the food industry to stop marketing junk food to our kids?" That seemed to me to be the question that needed to be addressed.

To the extent that people were trying to address the question of food marketing, they were getting their heads chopped off. In the late 70s, the Federal Trade Commission, which was led by Michael Pertschuk at the time, thought it would be a good idea to

restrict television marketing to kids or to set standards for what could be marketed to kids on television. And Congress passed a law saying the FTC couldn't do that. He was fired [Pertschuk was not fired but did face significant push-back and stepped down in 1981 when Reagan came into office]. There was absolute uproar about it.

That was 10 or 20 years before obesity was a serious problem. Again during the Obama administration there was an attempt by the Federal Trade Commission to set nutrition standards for food marketing. I thought the standards were really weak and generous [to industry], and even then Congress intervened and said, "don't be ridiculous, you can't touch that stuff," and the whole idea was dropped. There has been attempt after attempt to get the food industry to voluntarily not market junk foods to kids with an implied threat that "if you don't stop on your own, we're going to force you." But it's an empty threat because the politics don't allow it. So how are you going to do this stuff without considering the politics? And is RFK Jr. going to be able to do it better? We will see.

**BPPJ:** Bringing us back to Goldman, there has been a growing focus on using constructive dialogue as a way to bridge disagreements and together different perspectives. What strategies would you recommend to advocate for greater food system resilience in this increasingly polarized political climate?

**MN:** Well, everybody eats, that makes it a little bit easier. Although I was kind of stunned by the Department of Agriculture putting out a notice that "no longer is leftist ideology going to run dietary guidelines." I thought, "leftist ideology?" Since when have the dietary guidelines ever been developed with leftist ideology? And then I thought, "Oh, they're talking about plants." The

dietary guidelines advisory committee recommended that there be an increase in the consumption of plants and a decrease in the consumption of meat. That's "leftist ideology." Diets are being categorized as "left" and "right." Healthy diets are left. Unhealthy diets are right. If you're being advised to eat healthfully, it's the Nanny State. If you get to eat anything you want, it's not. I find the whole thing to be absolutely amazing.

But my understanding is that, if you want to talk to people who don't agree with you, the first thing you have to do is shut up and listen. You have to listen actively, really listen, and then try to deal with what you're hearing. But the problem with dealing with opposition of this kind is that it's not fact-based, because people have very different fact bases. We no longer have shared facts in this country. Or as one person put it, the facts are the same, it's just people's perceptions of them. The facts are there, but there are people who believe in them and people who don't.

The bifurcation is simple: if you get all your news from MSNBC, you have one point of view, if you get all your news from Fox, you have a different set of facts. All you can do in that situation is to be human and to state your opinion with as little judgment as possible, and try to have human connections with people who disagree with you. It seems to me that looking for common understanding is a nice thing to do anyway. But I think that's very difficult right now, because people don't agree on facts. All you can do is say what you think, difficult as it may be.

**BPPJ:** Given the current political climate, if you were just starting in food policy today, would you approach your career any differently?

**MN:** It's interesting that you asked that. I'm giving the graduation address to the School of Public Health at [Johns] Hopkins in May. I don't know what to tell them! I don't know what to tell them except that the work that they're trained for is the most important work in the world, and they've got to go out and find some way to do it.

But I don't know what I would have done. It's so hard for me because I came of age in that 30-year window when we thought we were going to change the world for the better. You didn't have to pay much for college, you didn't have to pay much for health care, you could buy a house on a very low salary, you could have a middle class life as an academic. That was my experience. It never occurred to me that it was an anomaly, I thought it was normal! I thought this was historical progress, it never occurred to me what the pushback was going to be. We're in the pushback era now, and I would say that this is an era that calls for an extraordinary amount of bravery, integrity, honesty, forthrightness, and courage. You've got to have courage to be able to stand up for [your] principles.

I'm a big believer in principles and values: figure out what [your principles] are and stick to them as best you can. Do the best you can under very difficult circumstances, but what you're doing is really important. If you can't do anything else, go volunteer at a school, teach kids about food, teach kids how to cook, teach kids how to grow vegetables. That will be something they'll have for the rest of their lives. Try to get paid for it.

It's a really tough question. I don't have a very good imagination [so] I can't put myself in this situation except you have to overcome the fear.



## *Notes*



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