



AMERICAN
SUSTAINABLE
BUSINESS
COUNCIL

Political Play:
*Advocating for Carbon Pricing
Policy*

3. April. 2019



a project of



Sustainable Food
Trade Association
organic solutions for sustainability



COMMIT. ACT. IMPACT.

Climate Collaborative Commitment Areas



Integrate carbon farming
into the agricultural
supply chains



Increase energy
efficiency



Reduce food-waste in
the supply chain



Remove commodity-
driven deforestation
from supply chains



Responsible
engagement in
climate policy



Reduce the climate
impact of packaging



Commit to 100%
renewable power



Reduce short-lived
climate pollutant
emissions



Reduce climate
impacts of
transportation

How to commit



TAKE ACTION

BLOG

MEDIA & RESOURCES

EVENTS

ABOUT

DONATE



More companies are taking action to reverse climate change than ever before. They're tackling this global challenge not only because it's essential to the future of our planet but also because doing so offers tremendous opportunities for growth, job creation, and prosperity.

Companies can help reverse climate change by making a commitment to one or more of these initiatives.

WHY TAKE ACTION?

Climate change is both the greatest threat our planet has ever faced

MAKE A COMMITMENT

SIGNUP FOR UPDATES

Add Your Email Address



How many companies have committed?

Justin's



gaia
HERBS

372

Companies
Committing to Action

1426

Commitments



Community
FOOD CO OP



REBBL™

seventh
generation.



MegaFood®
Fresh From Farm To Tablet™

nutiva®
NURTURE VITALITY™



THANK YOU TO OUR DONORS!

Alter Eco

Annie's

Associated Labels and
Packaging

Aurora Organic Dairy

California Olive Ranch

Cheer Pack

Clif Bar & Company

Connective Impact

Danone North

America

Decker and Jessica

Rolph

Dr. Bronner's

Eatsie.us

Elk Packaging

Foodstirs

Gaia Herbs

General Mills

Good Earth Natural
Foods

GrandyOats

GreenSeed Contract
Packaging

Griffith Foods

Guayaki

Happy Family

Harmless Harvest

INFRA

Justin's

KeHE

Lotus Foods

Lundberg Family Farms

MegaFood

Melt Organic

MOM's Organic
Market

Mountain Rose Herbs

National Co+op
Grocers

Natural Habitats

Nature's Path

New Hope Network

Numi

Nutiva

Oregon's Wild Harvest

Organic India

Organic Valley

Outpost Natural Foods

Patagonia

Plum Organics

Pluot Consulting

Presence Marketing

REBBL

Safe Sterilization USA
West

Stahlbush Island Farms

Stonyfield

Straus Family

Creamery

Studio Fab

Traditional Medicinals

Trayak



COMMITMENT: RESPONSIBLE ENGAGEMENT IN CLIMATE POLICY



Why Commit To Responsible Engagement in Climate Policy?

- A commitment to responsible engagement in climate policy means that your company commits to supporting legislation to:
 - Promote energy efficiency and renewable energy;
 - Increase investment in a clean energy economy;
 - Support climate change adaptation; and
 - Put a price on carbon emissions.

159 Companies have made a commitment to policy engagement

Why do we need climate policy? The global nature of climate change – a true “tragedy of the commons” – makes it too easy for the efforts of climate-forward corporations to be rendered moot by the actions of others that fail to act in a similarly climate-friendly manner. Only with government policies and enforcement can we hope to enact the kinds of sweeping changes needed to make a difference and to level the playing field for businesses.

Previous Webinars:

- Bring it Together: How Business Can Incorporate and Advocate for Climate-Friendly Agriculture
- Put Your Policy Where Your Mouth Is: How Food Waste Policy Can Help Solve Climate Change and Help Your Business
- Jerry Taylor Keynote at the Climate Action Summit

Our Speakers



John Minor

*Policy Manager,
American Sustainable
Business Council*



Harold Hedelman

*Co-Founder,
Business Climate Leaders*



MODERATOR

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*Associate Director
Sustainable Food Trade Association
(SFTA)*



Chris Adamo

*Vice President for Federal and
Industry Affairs,
Danone North America*



Jessie Arnell

*Associate, Federal Policy and
Campaigns
CERES*

The Business Case for Carbon Pricing



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Building the Voice and Power of Business

Collectively Representing over 250,000 businesses




A photograph of a man carrying a young child on his shoulders, standing in floodwaters in front of a light blue house. The man is wearing a light blue shirt and dark brown waders. The child is wearing a blue jacket and jeans. The house is a two-story structure with light blue siding and a dark roof. The water is murky and reflects the sky. The scene is set in a residential area with trees in the background.

Climate Change Presents Massive Threat to Economy

- Unchecked, climate change could reduce global GDP by over 20% by 2100
- US GDP lost to climate change will likely equal \$44 trillion by 2060
- By the end of the century, \$280 billion will be needed to adapt roads and railways
- Global sea levels are projected to rise another 1 to 4 feet by 2100



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What is a carbon price?

- A carbon price internalizes the cost of greenhouse gas emissions by assigning a monetary value (fee/tax) to each ton emitted
- The price can be implemented at different points throughout the supply chain
- Revenues can be returned to citizens and businesses through dividends to help offset higher prices and/or invested to further reduce emissions, promote resiliency, and create jobs

ASBC's Carbon Pricing Principles

- Comprehensive, with no exceptions
- Setting a meaningful price
- Tax the highest CO₂ emitters at the source
- Protecting US competitiveness
- Using the revenue to benefit the economy



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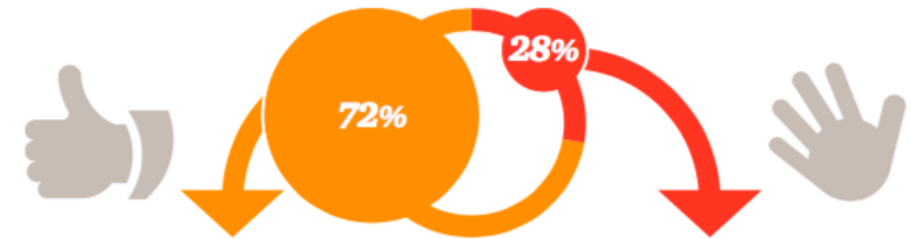
Benefits of a carbon price

- Reduce emissions
- Promote fair competition
- Spur innovation and create jobs
- The price of a product should include the damage to society that it causes
- Raising the price gives consumers and energy suppliers incentive to shift to energy efficiency and clean energy

Businesses are leading on climate action

- Nearly half of America's largest companies have at least one climate or clean energy target
- Climate Disclosure Project (CDP) found almost 1,400 businesses worldwide, representing about \$7 trillion in annual revenue, have either already implemented an internal carbon price or will do so in the next two years
- PwC found a majority of businesses (72%) are actively pursuing renewable energy procurement, and of those that aren't (28%), 61% said it was because there was no mandate or they didn't see it as strategic

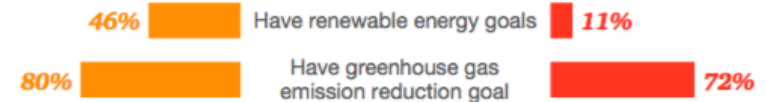
Renewable energy procurement



Actively pursuing

Not actively pursuing

Corporate goals



Drivers of intent to purchase*



Drivers for lack of intent to purchase*



Businesses
support
carbon pricing



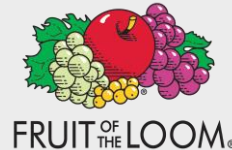
EILEEN
FISHER



MARS



Biogen



AIR CANADA



Kellogg's



naturepedic



DELTA

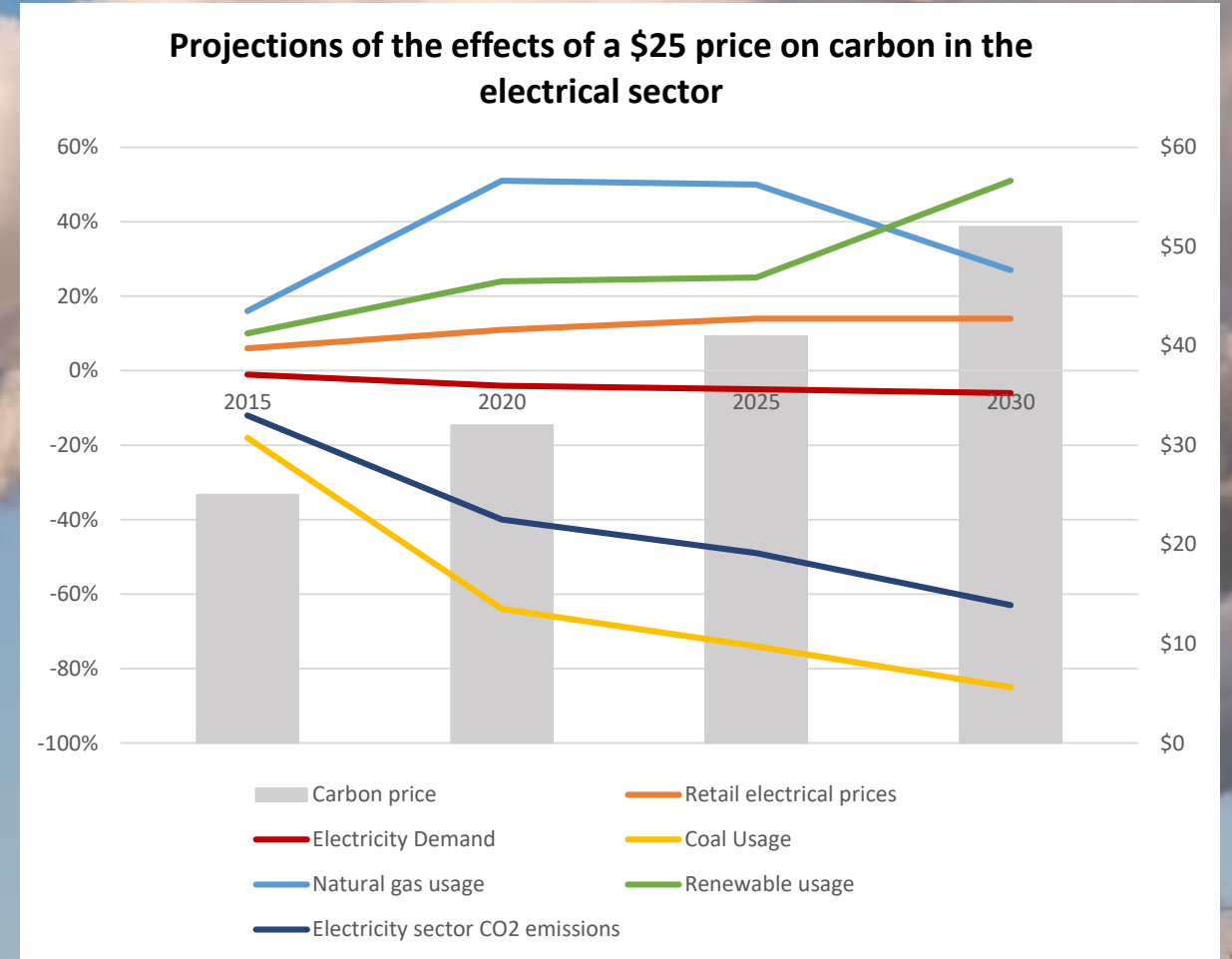


Reduce emissions

- A national, economy-wide carbon price could reduce emissions to 39% below 2005 levels
 - Significantly greater than the United States' commitment under the Paris Climate Agreement (26-28% from 2005 levels by 2025)
- Statewide bills set prices at different levels, but impacts will still meaningful

Promote fair competition

- U.S. energy market does not accurately reflect fossil fuel costs and has distorted competitive market forces
 - Failed to account for the costly environmental damage of fossil fuels
 - Incentivized fossil fuel use through favorable tax treatments and subsidies
- A carbon price would allow renewables to compete fairly




Spur innovation & create jobs

- By 2021, EVs could be cheaper by the mile than oil-fueled cars
- The amount of deployed MWh of utility-scale battery storage capacity doubled in 2016
- Increasing demand for renewables will result in potentially game-changing innovation:
 - Floating turbines
 - Biophotovoltaic devices
- A study on a national, economy-wide carbon price found it would create over 2 million jobs



Carbon pricing in the Green New Deal

- The Green New Deal resolution did not specifically include carbon pricing, however that doesn't mean it could not be incorporated in the final bill.
- Part of a much larger plan to combat climate change.
- Carbon pricing could be a main funding source for the necessary green infrastructure improvements and programs.
- Need market-based solutions to facilitate transition to cleaner and renewable energy sources.
- Learn more about business support behind the GND at <http://asbcouncil.org/action-center/campaigns>.

An aerial photograph of a city, likely New York City, showing a mix of urban development and green spaces. A large, semi-transparent circular graphic is overlaid on the left side of the image, containing text. The background shows various skyscrapers, parks, and a river in the distance.

Ways to take action on carbon pricing

- Join our coalition of businesses supporting a national price on carbon.
- Sign an op-ed supporting carbon pricing in your state
- Support state-based policies – currently looking for businesses in NH, VT, MA, NY, CT, RI, NJ, MD, WA
- Host a business roundtable luncheon to educate other business leaders on carbon pricing

**For more information, go to
carbonprice.asbcouncil.org**



BCI

BUSINESS

CLIMATE

LEADERS



An action team of **Citizens' Climate Lobby**



Harold Hedelman

- **Co-Founder**
- **Director of Engagement**
- **Chief Visionary & Bottleswasher**

harold@businessclimateleaders.org



1 | BCL / CCL Introduction

2 | Overview: Carbon Pricing 101

3 | Analysis of Various Proposals

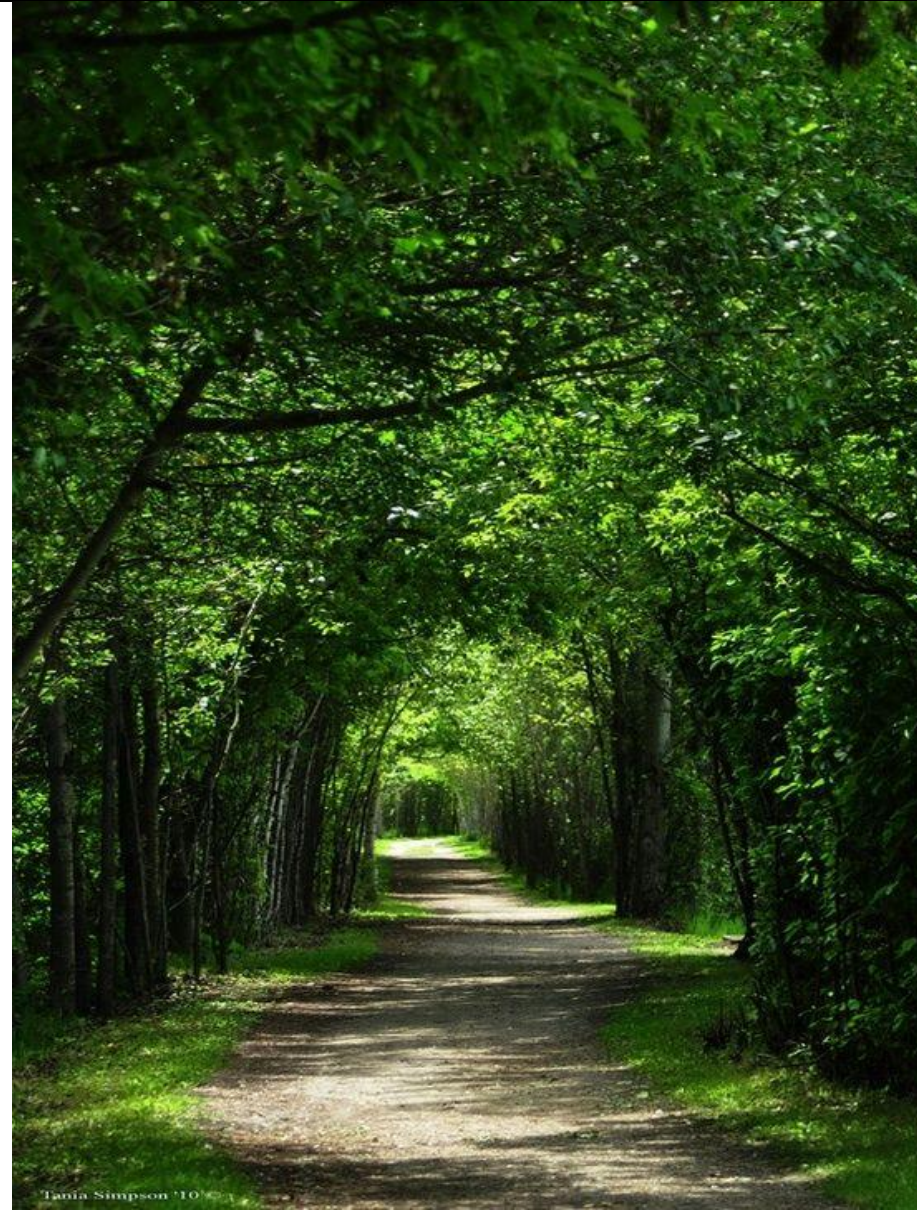
4 | Details: Energy Innovation and Carbon Dividend Act

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Political will for market-friendly climate solutions

Focus: Energy Innovation and Carbon Dividend Act





- 1 International**
120,000+ members in United States, Canada, Australia, India, Germany, Sweden, Panama...
- 2 Nonpartisan**
We build relationships with everyone, even those who oppose us.
- 3 Nonprofit**
Volunteer driven NGO with 501c(3) and 501c(4) status.
- 4 Solution focus**
U.S.: Energy Innovation and Carbon Dividend Act
- 5 Respect, appreciation and gratitude**
We treat everyone, even those who oppose us, with respect, appreciation and gratitude.





| **534 chapters**

| **All U.S. Congressional Districts**

| **2018: 1402 lobbying meetings**

| **2018: 4248 published media pieces**



Feb '16

CATALYZED Climate Solutions Caucus in the House

July '18

Caucus Republicans introduced carbon tax legislation in the House

Nov '19

Energy Innovation and Carbon Dividend Act was introduced in Senate and House





CCL Action Team



Engage businesses in carbon pricing advocacy with Members of Congress



In-district and with other civic leaders



In D.C. and in State Capitols



Collaborate with trade associations and business- focused NGOs



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Why a Carbon Price is SO Central



A Cornerstone of Effective Climate Policy

- Economy-wide market signal
- Price follows all products and services, influencing decisions
- Boost other climate solution strategies- promotes clean energy



Three simple principles

- **Effective:** Preserves what we love and need
- **Efficient:** Produces maximum benefits at minimum costs
- **Equitable:** Results and costs are fairly distributed

Carbon Tax: *Common Elements*



	Policy Proposal A	Policy Proposal B	Policy Proposal C
Environmental Sustainability			
Initial Price			
Annual Increase			
Price in 20 years			
Greenhouse Gases in Scope			
Projected Emission Reductions			

Initial Price: the price per ton of CO₂e in the first year of implementation

Carbon Tax: *Common Elements*



	Policy Proposal A	Policy Proposal B	Policy Proposal C
Environmental Sustainability			
Initial Price			
Annual Increase			
Price in 20 years			
Greenhouse Gases in Scope			
Projected Emission Reductions			

Annual increase: the amount added to the price/ton of CO₂e every year, creating a steadily increasing price. This approach allows for a low-economic-shock introduction, while gradually ratcheting up the incentive to transition to clean energy in a predictable and gradual manner.

Carbon Tax: *Common Elements*



	Policy Proposal A	Policy Proposal B	Policy Proposal C
Environmental Sustainability			
Initial Price			
Annual Increase			
Price in 20 years			
Greenhouse Gases in Scope			
Projected Emission Reductions			

Price in 20 years: the estimated price/ton of CO₂e after 20 year, assuming the policy stays in effect.

Carbon Tax: *Common Elements*



	Policy Proposal A	Policy Proposal B	Policy Proposal C
Environmental Sustainability			
Initial Price			
Annual Increase			
Price in 20 years			
Greenhouse Gases in Scope			
Projected Emission Reductions			

All proposals target CO₂ the most significant Greenhouse Gas (GHG). Some include methane (unburned natural gas), a far more potent GHG than CO₂. Some include GHG's like HFCs (often leaked from refrigeration equipment) which are not derived from fossil fuels, but are potent.

Carbon Tax: *Common Elements*



	Policy Proposal A	Policy Proposal B	Policy Proposal C
Environmental Sustainability			
Initial Price			
Annual Increase			
Price in 20 years			
Greenhouse Gases in Scope			
Projected Emission Reductions			

Estimated absolute reductions in country-level emissions, based on models and assumptions of policy implementation.

Comparing reductions requires being aware of the baseline year chosen for each proposal.



Carbon Tax: *Common Elements*

Policy Proposal A		Policy Proposal B		Policy Proposal C	
Environmental Sustainability					
Initial Price					
Annual Increase					
Price in 20 years					
Greenhouse Gases in Scope					
Projected Emission Reductions					
Economic Sustainability					
Fund Allocation					
Border Adjustments					

Proposals for use of revenue fall into several categories, including cash to taxpayers, tax reductions, general funds, specific pay-fors, investment in mitigation or adaptation measures, and support for frontline communities.



Carbon Tax: *Common Elements*

Policy Proposal A		Policy Proposal B	Policy Proposal C
Environmental Sustainability			
Initial Price			
Annual Increase			
Price in 20 years			
Greenhouse Gases in Scope			
Projected Emission Reductions			
Economic Sustainability			
Fund Allocation			
Border Adjustments			

Border Carbon Adjustments (BCAs) harmonize carbon prices between countries. They create a “level playing field” between countries that have a price on carbon emissions, and those countries that do not. Without BCAs, industries would be incented to locate away from countries with a price to countries without a price, thus creating "leakage" of GHG emissions.

Carbon Tax: *Common Elements*



Policy Proposal A		Policy Proposal B		Policy Proposal C	
Environmental Sustainability					
Initial Price					
Annual Increase					
Price in 20 years					
Greenhouse Gases in Scope					
Projected Emission Reductions					
Economic Sustainability					
Fund Allocation					
Border Adjustments					
Political Sustainability					
Rollbacks					

Reduction in regulation: Reduction/elimination of regulations

Note: Conservatives support rollbacks as reducing government oversight.

Carbon Tax: *Common Elements*



	Policy Proposal A	Policy Proposal B	Policy Proposal C
Environmental Sustainability			
Initial Price			
Annual Increase			
Price in 20 years			
Greenhouse Gases in Scope			
Projected Emission Reductions			
Economic Sustainability			
Fund Allocation			
Border Adjustments			
Political Sustainability			
Rollbacks			
Revenue Neutrality			

Neutrality means all revenues (except for administrative costs) are returned to citizens or used to reduce taxes

Note: Political conservatives tend to support neutrality since it indicates “no new government programs”

Carbon Tax: *Common Elements*



	Policy Proposal A	Policy Proposal B	Policy Proposal C
Environmental Sustainability			
Initial Price			
Annual Increase			
Price in 20 years			
Greenhouse Gases in Scope			
Projected Emission Reductions			
Economic Sustainability			
Fund Allocation			
Border Adjustments			
Political Sustainability			
Rollbacks			
Revenue Neutrality			
Torte Liability Immunity			

The Climate Leadership Council's proposal includes language that would grant fossil fuel producers immunity from lawsuits that claim damages caused by the social cost of carbon



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Washington State Bill



	WA State
	<i>I-1631</i>
Environmental Sustainability	
<i>Initial Price</i>	\$15
<i>Annual Increase</i>	\$2
<i>Price in 20 years</i>	\$45 in 2035
<i>Greenhouse Gases Covered</i>	Just those from fossil fuels
<i>Emission Reductions</i>	Until WA targets met
Economic Sustainability	
<i>Border Adjustments</i>	N.A. **
<i>Use of \$\$</i>	70% - Clean Energy 25% - Water/Forests 5% Healthy Comm's 0% Households
<i>Included in Ominbus Approach</i>	No
Social Sustainability	
<i>Frontline Community Impact</i>	Yes. 35% will be spent in impacted communities*
Political Sustainability*	
<i>Revenue Neutral</i>	No
<i>Rollback</i>	N.A.
<i>Immunity Tort Liability</i>	N.A.

Pan-Canadian Framework



	WA State	Pan-Canadian Framework
	<i>I-1631</i>	<i>4 non-priced provinces*</i>
Environmental Sustainability		
<i>Initial Price</i>	\$15	\$10 Canadian **
<i>Annual Increase</i>	\$2	\$10**
<i>Price in 20 years</i>	\$45 in 2035	\$50**
<i>Greenhouse Gases Covered</i>	Just those from fossil fuels	Just those from fossil fuels
<i>Emission Reductions</i>	Until WA targets met	By 2022: 11% < 2005****
Economic Sustainability		
<i>Border Adjustments</i>	N.A.**	<u>credits address economic 'leakage'***</u>
<i>Use of \$\$</i>	70% - Clean Energy 25% - Water/Forests 5% Healthy Comm's 0% Households	90% Households
<i>Included in Omnibus Approach</i>	No	Yes
Social Sustainability		
<i>Frontline Community Impact</i>	Yes. 35% will be spent in impacted communities*	Indirect*****
Political Sustainability*		
<i>Revenue Neutral</i>	No	No
<i>Rollback</i>	N.A.	No
<i>Immunity Tort Liability</i>	N.A.	No

Curbelo's Bill



	WA State	Pan-Canadian Framework	Curbelo
	<i>I-1631</i>	<i>4 non-priced provinces*</i>	<i>Market Choice Act</i>
Environmental Sustainability			
<i>Initial Price</i>	\$15	\$10 Canadian **	\$24
<i>Annual Increase</i>	\$2	\$10**	2% over inflation
<i>Price in 20 years</i>	\$45 in 2035	\$50**	~\$51.58
<i>Greenhouse Gases Covered</i>	All fossil fuels	All fossil fuels	All fossil fuels +HFCs
<i>Emission Reductions</i>	Until WA targets met	By 2022: 11% < 2005****	In 10 yrs: ~ 30% < 2005
Economic Sustainability			
<i>Border Adjustments</i>	N.A.**	<u>No, but credits address economic 'leakage'***</u>	Yes
<i>Use of \$\$</i>	70% - Clean Energy 25% - Water/Forests 5% Healthy Comm's 0% Households	90% Households	25% > U.S. Treasury 75% > Trust Fund - 70% H'way Trust - 30% 12+ others 0% Households
<i>Included in Ominbus Approach</i>	No	Yes	No
Social Sustainability			
<i>Frontline Community Impact</i>	Yes. 35% will be spent in impacted communities*	Indirect*****	Indirect
Political Sustainability*			
<i>Revenue Neutral</i>	No	No	No
<i>Rollback</i>	N.A.	No	Yes
<i>Immunity / Tort Liability</i>	N.A.	No	No

Climate Leadership Council



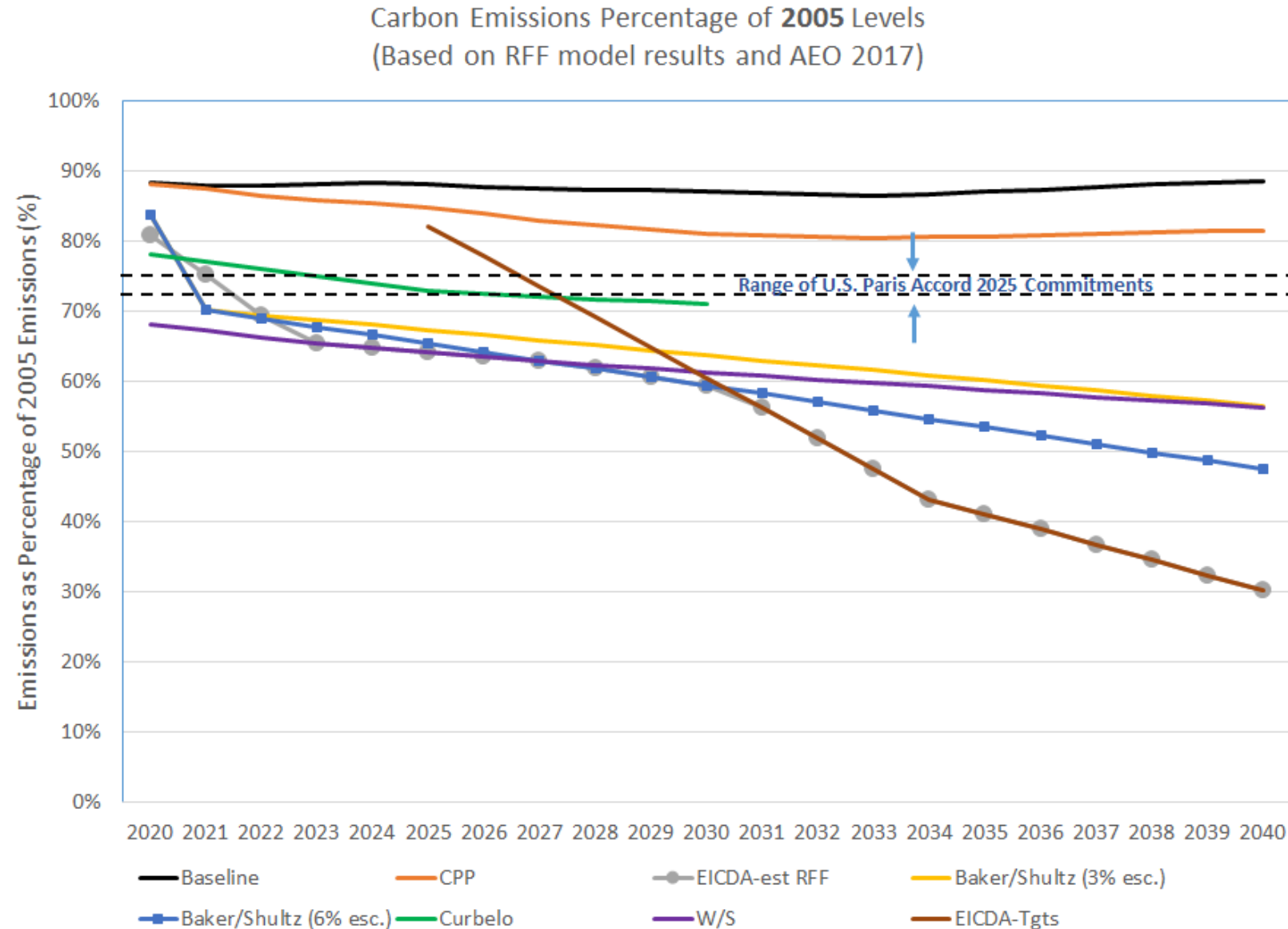
	WA State	Pan-Canadian Framework	Curbelo	CLC
	<i>I-1631</i>	<i>4 non-priced provinces*</i>	<i>Market Choice Act</i>	<i>Carbon Dividend</i>
Environmental Sustainability				
<i>Initial Price</i>	\$15	\$10 Canadian **	\$24	\$40
<i>Annual Increase</i>	\$2	\$10**	2% over inflation	~2% over inflation
<i>Price in 20 years</i>	\$45 in 2035	\$50**	~\$51.58	~\$87
<i>Greenhouse Gases Covered</i>	All fossil fuels	All fossil fuels	All fossil fuels +HFCs	Only CO2
<i>Emission Reductions</i>	Until WA targets met	By 2022: 11% < 2005****	In 10 yrs: ~ 30% < 2005	By 2025: 27% < 2005*
Economic Sustainability				
<i>Border Adjustments</i>	N.A.**	<u>No, but credits address economic 'leakage'***</u>	Yes	Yes
<i>Use of \$\$</i>	70% - Clean Energy 25% - Water/Forests 5% Healthy Comm's 0% Households	90% Households	25% > U.S. Treasury 75% > Trust Fund - 70% H'way Trust - 30% 12+ others 0% Households	100% Households
<i>Included in Ominbus Approach</i>	No	Yes	No	No
Social Sustainability				
<i>Frontline Community Impact</i>	Yes. 35% will be spent in impacted communities*	Indirect*****	Indirect	Indirect
Political Sustainability*				
<i>Revenue Neutral</i>	No	No	No	Yes
<i>Rollback</i>	N.A.	No	Yes	Yes
<i>Immunity Tort Liability</i>	N.A.	No	No	Yes

Citizens Climate Lobby



	WA State	Pan-Canadian Framework	Curbelo	CLC	CCL
	<i>I-1631</i>	<i>4 non-priced provinces*</i>	<i>Market Choice Act</i>	<i>Carbon Dividend</i>	<i>Energy Innovation & Carbon Dividend Act</i>
Environmental Sustainability					
<i>Initial Price</i>	\$15	\$10 Canadian **	\$24	\$40	\$15 (U.S. Dollars)
<i>Annual Increase</i>	\$2	\$10**	2% over inflation	~2% over inflation	\$10 (\$15*)
<i>Price in 20 years</i>	\$45 in 2035	\$50**	~\$51.58	~\$87	\$205 / \$280
<i>Greenhouse Gases Covered</i>	All fossil fuels	All fossil fuels	All fossil fuels +HFCs	Only CO2	All from fossil fuels, plus HFCs
<i>Emission Reductions</i>	Until WA targets met	By 2022: 11% < 2005****	In 10 yrs: ~ 30% < 2005	By 2025: 27% < 2005*	20 Yrs: 50% < 1990
Economic Sustainability					
<i>Border Adjustments</i>	N.A.**	<u>No, but credits address economic 'leakage'****</u>	Yes	Yes	Yes
<i>Use of \$\$</i>	70% - Clean Energy 25% - Water/Forests 5% Healthy Comm's 0% Households	90% Households	25% > U.S. Treasury 75% > Trust Fund - 70% H'way Trust - 30% 12+ others 0% Households	100% Households	100% Households
<i>Included in Ominbus Approach</i>	No	Yes	No	No	No
Social Sustainability					
<i>Frontline Community Impact</i>	Yes. 35% will be spent in impacted communities*	Indirect*****	Indirect	Indirect	Indirect
Political Sustainability*					
<i>Revenue Neutral</i>	No	No	No	Yes	Yes
<i>Rollback</i>	N.A.	No	Yes	Yes	Hiatus
<i>Immunity Tort Liability</i>	N.A.	No	No	Yes	No

Emission Reductions Comparison





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EICDA: Jobs Created



Under Carbon Fee and Dividend

2.1M New Jobs

10 years

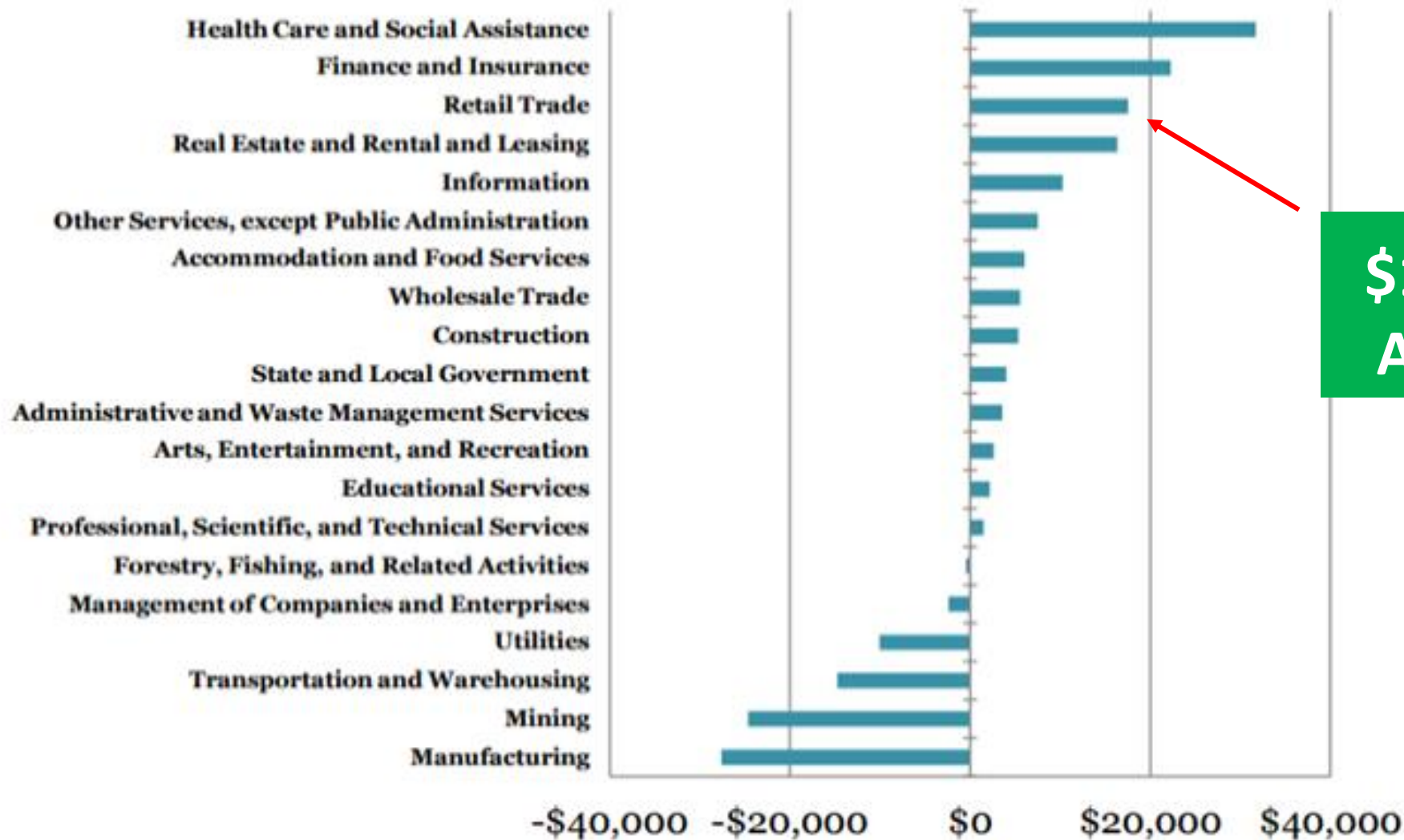
2.8M New Jobs

20 years

EICDA: Retail Sector Growth



GDP by Major Industries (national level)



**\$18B Average
Annual Boost**



EICDA: Regulatory Pause

Senate: calls for an EPA review after 6 years.

House: prevents new regulations by the EPA on covered emissions, but if emission targets are not being met after 10 years regulatory authority over these emissions would be restored.

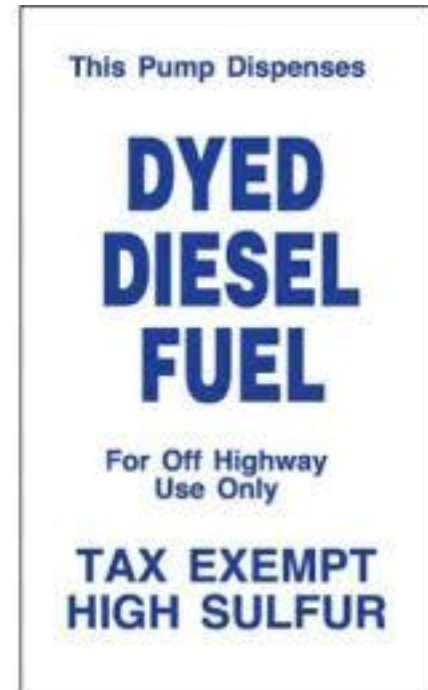
Neither impacts regulations on any other pollutants, including auto mileage standards, water quality and more.



EICDA: Ag Fuel Exemption



The bill maintains current tax exempt status for diesel fuel used in agriculture



EICDA: Carbon Sequestration



Any facility that captures and permanently sequesters its CO₂ emissions could receive a rebate for any carbon fees it has paid.



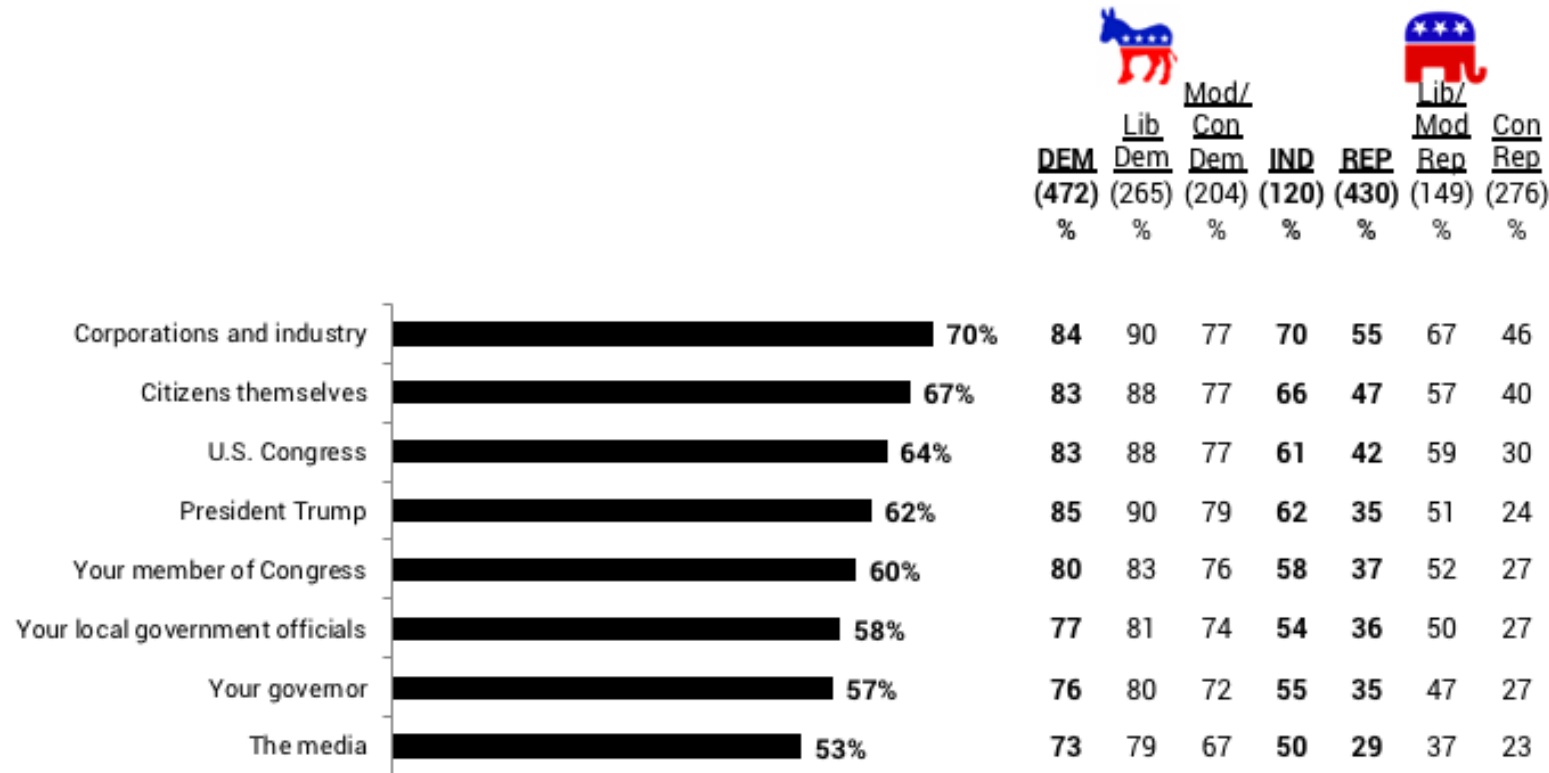


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What Voters Want



Seven in Ten Registered Voters Want Corporations and Industry To Do More to Address Global Warming - % who say should be doing "much more" or "more" -



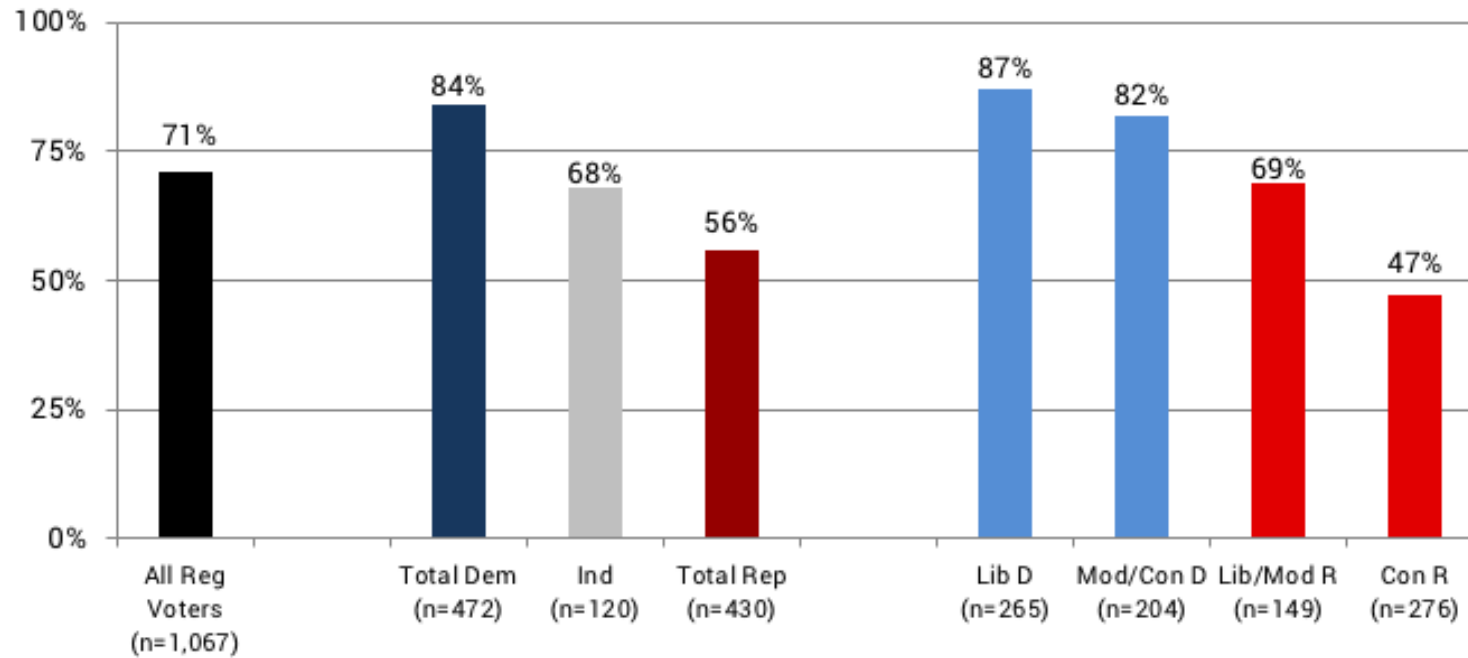
Do you think each of the following should be doing more or less to address global warming?

March 2018. Base: Registered American Voters (n=1,067).

What Voters Want



Registered Voters Support Requiring Fossil Fuel Companies to Pay a Carbon Tax - % who “strongly” or “somewhat support” -



How much do you support or oppose the following policy? Require fossil fuel companies to pay a carbon tax and use the money to reduce other taxes (such as income tax) by an equal amount.

March 2018. Base: Registered American Voters.

What Companies Can Do



Join BCL

Lobby / Endorse for National / State carbon taxes

Influence trade groups and chambers of commerce

Activate supply chain

Educate employees and customers



Energy Innovation AND Carbon Dividend Act

THE BIPARTISAN CLIMATE
SOLUTION

Support



<https://energyinnovationact.org/>

Discussion



John Minor

*Policy Manager,
American Sustainable
Business Council*



Harold Hedelman

*Co-Founder,
Business Climate Leaders*



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*Associate Director
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(SFTA)*



Chris Adamo

*Vice President for Federal and
Industry Affairs,
Danone North America*



Jessie Arnell

*Associate, Federal Policy and
Campaigns
CERES*

Lawmaker Education & Advocacy Day (LEAD) on Carbon Pricing

Business Backs a U.S. Carbon Price

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Discussion

MODERATOR



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*Policy Manager,
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Business Council*



Harold Hedelman

*Co-Founder,
Business Climate Leaders*



Lisa Spicka

*Associate Director
Sustainable Food Trade Association
(SFTA)*



Chris Adamo

*Vice President for Federal and
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Jessie Arnell

*Associate, Federal Policy and
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