



May 26, 2022

President Joe Biden
The White House
1600 Pennsylvania Ave, N.W.
Washington, DC 20500

Ambassador Susan Rice
Assistant to the President for Domestic Policy
1600 Pennsylvania Ave, N.W.
Washington, DC 20500

Dear President Biden and Ambassador Rice,

The Center for Science in the Public Interest (CSPI)ⁱ applauds your plan to convene a White House Conference on Hunger, Nutrition, and Health. The first conference occurred over 50 years ago, spurring the movement toward the Nutrition Facts panel and leading to the creation and expansion of critical nutrition and anti-hunger safety net programs: the Supplemental Nutrition Assistance Program (SNAP), the Special Supplemental Nutrition Program for Women, Infants and Children (WIC), and the National School Breakfast and Lunch Programs (school meals). Today we face challenges beyond those of 50 years ago: an epidemic of diet-related disease, COVID-19-related morbidity partly associated with diet, a food environment that makes the healthy choice the harder choice, and much more. Hunger, nutrition insecurity, and diet-related chronic diseases disproportionately affect people of color as well as low-income, rural, and other underserved populations. And preventable diet-related diseases such as heart disease and diabetes are leading causes of death and disability. We hope this Conference will accelerate progress to ending hunger and reducing the impact and burden of preventable diet-related disease.

This Conference is an opportunity to address hunger, food system inequities, chronic disease, and health together, and to modernize and enhance our food system. It is a chance to build our food environment into one that ensures access to a healthy diet for all residents of the United States. The Conference can be a catapult to an improved food system infrastructure that is equitable, just, resilient, and sustainable.

The COVID-19 pandemic has laid bare the strengths and weaknesses of our food system. For instance, although overall food insecurity levels stayed roughly the same during the pandemic, likely attributable to many public supports and increased investments in SNAP, WIC, and school meals, food insecurity among children increased and existing inequities in food security widened between Black and Latine households when compared to white households.ⁱⁱ

As a country, we must do more to ensure no one goes hungry and reduce diet-related disease. We can achieve this by creating a food system and environment that provide equitable access to healthy food, that are transparent, and that ensure food is safe. As such, we lay out our overarching process recommendations and top policy priorities for the Conference.

Overarching recommendations for conducting the Conference:

1. **Establish quantifiable goals to increase healthy eating, reduce nutrition insecurity, and reduce diet-related diseases.** As announced, the Conference calls for ending hunger and increasing healthy eating and physical activity by 2030 so that fewer Americans experience diet-related diseases like diabetes, obesity, and hypertension. This overall aspiration should be complemented by quantifiable goals for increasing healthy eating to reduce nutrition insecurity and diet-related diseases, as laid out in bipartisan legislation introduced by Senators Cory Booker (D-NJ) and Mike Braun (R-IN) and Representatives James P. McGovern (D-MA) and Jackie Walorski (R-IN) last year (S.3064/H.R.5724). That legislation ambitiously called for reducing by

half the level of nutrition insecurity by 2025 and reducing by half that of diet-related diseases by 2030. The administration could also integrate and build on existing objectives from Healthy People 2030 which includes a number of relevant goals: reduce consumption of added sugars, saturated fat, and sodium; increase consumption of fruits, vegetables, and whole grains; and reduce diet-related disease. We urge the Conference to establish aggressive and achievable goals and timelines, including metrics for assessing nutrition security.

2. **Center food justice, health equity, and racial justice in the Conference design and outreach efforts.** We understand that food system inequities that mediate access and affordability do not occur in a vacuum. Instead, they reflect, among other things, long-standing effects of unmitigated structural and institutional racism. As such, we recommend that food justice, health equity, and racial justice principles and strategies permeate the content of the Conference to ensure recommendations that promote equity are included in the nation's food policy agenda. To accomplish this, we suggest inviting stakeholders who have a background in these areas to inform the Conference agenda. Additionally, members of the populations most burdened by food system inequities should be included as subject matter experts by overseeing the content and outreach efforts for the Conference. Specifically, we suggest centering people with lived expertise that experience barriers to accessing SNAP and other food assistance programs, including, but not limited to, Black, Indigenous, and Latine people, members of the LGBTQIA+ community, military families, U.S. territory residents, and people who have been formerly incarcerated. As the recommendations from the Conference are enacted and implemented, we further encourage centering food justice, health equity, racial justice, and community input.
3. **Ensure transparency in the Conference planning process.** We recommend that the administration make public the online submissions for Conference ideas, similar to public comment, so that it is clear from whom the White House has heard. We also urge you to make available for public comment the proposed agenda for the Conference, as required in S.3064/H.R.5724, and as part of this agenda include a list of proposed topics. As part of the regional listening sessions and Conference, we recommend you post any comments and testimony submitted from the public. At the Conference, we recommend you post the in-person invitees and require and make public conflicts-of-interest statements for Conference speakers.

Top policy priorities:

1. **Establish a federal entity to coordinate a strategy for strengthening the food system, which will reduce diet-related disease.** This Conference comes on the heels of a recent Government Accountability Office reportⁱⁱⁱ that identified 200 federal efforts related to diet across 21 federal agencies that found agency efforts to be fragmented, and recommended that a federal entity coordinate a strategy for reducing diet-related disease. The cross-government cooperation required to address the infant formula crisis further highlights the necessity of a coordinating body. We recommend the administration, for example, create a new White House Deputy Assistant to the President for Food and Nutrition Policy who would lead a cross-agency Federal Food and Nutrition Working Group. That Working Group would coordinate between and report to the President, the Cabinet, and Congress on nutrition, food access, health equity, sustainability and climate issues across agencies. In planning the Conference, the administration has, in effect, created this working group as the Conference has required a whole-of-government approach to coordinate across numerous federal agencies and staff.
2. **Issue an Executive Order to require use of the *Food Service Guidelines for Federal Facilities (FSG)* for food and beverages sold and served at federally owned and operated facilities.** Developed by an interagency working group led by the Centers for Disease Control and

Prevention (CDC), the FSG are evidence-based, currently voluntary best practices to align food service in federal facilities with the *Dietary Guidelines for Americans* and advance food safety, facility efficiency, environmental support, and community development. The FSG are a critical tool to leverage government purchasing power and operations to improve health outcomes and reduce long-term health care costs^{iv} for the millions of people who rely on federal food service operations, including federal employees, veterans in Veterans Affairs hospitals, members of the armed services, and people who are incarcerated in federal prisons. Robust implementation would be an unmistakable signal to all that the federal government is willing to “walk the walk” when it comes to nutrition; ideally the private sector would begin to adopt similar policies. This executive order should also be a vehicle for advancing other Biden administration priorities through federal food procurement, such as improving racial equity and slowing climate change.

3. **Establish a mandatory front-of-package labeling system that effectively and conveniently signals to consumers the nutritional quality of foods.** Dozens of countries have already adopted front-of-package nutrition labeling systems, and a large body of experimental and real-world evidence show that such systems can promote more equitable access to nutrition information, encourage healthier diets, and promote reformulation. An ideal system would be mandatory, easy-to-understand, nutrient-specific, inclusive of calories, and interpretive with respect to the levels of added sugars, sodium, and saturated fat. Examples of systems that meet these criteria include warning labels that alert consumers to high levels of nutrients and traffic light labels that rate levels of nutrients as high, medium, or low (typically using the colors red, yellow, and green). Nutrient warning labels have shown the greatest efficacy across studies.
4. **Reduce excessive sodium in our food supply by establishing voluntary industry reduction targets that fully rein in sodium exposure to levels consistent with the Dietary Guidelines for Americans.** While we were pleased to see the Food and Drug Administration (FDA) release its short-term voluntary sodium reduction targets for industry, first proposed in 2016 in response to CSPI’s 2005 petition and subsequent litigation, the FDA must now work with industry to ensure robust implementation of the 2.5-year short-term targets and establish longer-term targets that would fully achieve safe levels of sodium in the food supply.
5. **Reduce excessive added sugar in our food supply.** Similar to the FDA sodium guidance, we urge the FDA to set voluntary and gradually decreasing added sugar reduction targets for packaged and restaurant foods and beverages.
6. **Strengthen nutrition research by supporting the establishment of a National Institute of Nutrition at the National Institutes of Health.** Nutrition is not the primary focus of any federal agency and additional coordination is necessary to advance research that addresses increasingly complex and interdisciplinary nutrition issues. The National Institutes of Health (NIH) is the largest funder of nutrition research, but this research makes up only 5 percent of its total funding and is spread across many NIH institutes. Nutrition research continues to be challenged by stagnant funding levels and a lack of resources for coordination. While the creation of the Office of Nutrition at NIH in 2015, its move to the Office of the Director in 2021, and the release of NIH’s first agency-wide strategic plan for nutrition research in 2020 are important steps forward, establishing a National Institute of Nutrition could further essential nutrition research within NIH and across federal departments and agencies.
7. **Support national, state, and local sugary drink taxes.** Sugary drink taxes could offset increases in federal investments for SNAP, WIC, and school meals, and for state and local community-driven public health programs and initiatives. Currently, nearly a dozen localities have enacted their own sugary drink taxes and there has been legislation introduced in Congress for nearly a

decade led by Rep. Rosa DeLauro (D-CT). At the Conference, we encourage you to consider such strategies which can drive down consumption and generate much-needed revenue for health programs.

8. **Continue support for healthy school meals for all and ensure school meals are aligned with the *Dietary Guidelines for Americans*.** While we were pleased to see the Biden administration call for expanding access to free school meals in the American Families Plan, the pandemic has made clear the continued importance of healthy school meals for all. Further, we must ensure that school meals meet evidence-based dietary recommendations that best support children's health and urge the U.S. Department of Agriculture (USDA) to establish an added sugar standard and update the sodium and whole grain-rich standards in the anticipated fall rulemaking this year. USDA should also provide robust technical assistance to schools to aid implementation.
9. **Provide \$100 million in nutrition security demonstration projects that increase access to healthy food while not increasing stigma or decreasing access.** Demonstration projects should test innovative strategies such as marketing guidelines for retailers, including hot and prepared foods, examining the level of a benefit boost needed to meaningfully impact nutritional and other health outcomes, and testing incentives for nutritious food combined with disincentives for less nutritious foods.
10. **Improve the retail food environment by issuing stronger stocking requirements for SNAP-authorized retailers and adding marketing requirements to increase all consumers' access to healthy food, both in-store and online.** Further improvements could be achieved by re-examining the SNAP retailer application process and requiring retailers to adhere to certain marketing and stocking guidelines that increase the availability, placement, and promotion of products that align with the latest *Dietary Guidelines for Americans*.
11. **Continue support for, protect access to, and increase the benefit for SNAP.** We applaud your work to update the Thrifty Food Plan (TFP) and urge your support for aligning the basis of SNAP allotments with the Low-Cost Food Plan. The Low-Cost Food Plan is more aligned with actual food costs than the TFP. Simultaneously, we urge you to protect SNAP eligibility by making permanent pandemic-era expanded college student access, eliminating bans for individuals with prior drug felony convictions, repealing the three-month time limit for adults facing work requirement barriers, and streamlining SNAP participation with enrollment in other programs.
12. **Continue support for increased fruit and vegetable benefits in WIC and update the WIC food package to align with the *Dietary Guidelines for Americans*.** We applaud the administration's support to enhance the monthly fruit and vegetable benefits for nearly 5 million women and children. We further appreciate your work to modernize WIC to reach more eligible mothers and their children and better meet their nutritional needs by updating the food packages to reflect the recommendations of the National Academies of Science, Engineering, and Medicine and the *Dietary Guidelines for Americans*.
13. **Adopt nutrition guidelines for all USDA Food Distribution Programs to improve access to nutritious food through the charitable food system.** The charitable food system is meant to be the last line of defense for families experiencing food insecurity. Yet more and more families rely on food banks regularly as their SNAP benefits run short at the end of the month. Uniform nutrition standards, which are currently absent from USDA Food Distribution Programs, would help reduce nutrition and health disparities by ensuring that families who rely on the charitable food system are able to access quality nutritious food.

- 14. Reduce anticompetitive manufacturer and retailer marketing practices that harm consumer health.** The Federal Trade Commission (FTC) is currently investigating harmful trade promotion practices and category captain arrangements in their broader supply chain disruption investigation. These grocery retail practices drive up entry costs, cede control of critical retail decisions to leading brands, and ultimately lead to a grocery store environment that disproportionately promotes unhealthy options. We urge you to support the FTC investigation, disclosure of investigation findings, and any enforcement actions that stem from these findings.
- 15. Urge the FTC to use its 6(b) authority to complete a follow-up study on marketing expenditures by food and beverage companies to children and adolescents.** The FTC previously completed two reviews on this topic, in 2008 and 2012. Since these reports were published, marketing tactics and stratagems have evolved, moving aggressively into digital media and becoming more sophisticated in marshalling data and algorithms to target individuals, including children. The Commission should update topics in previous reports and incorporate three new priorities: 1. food and beverage marketing to children and adolescents of color; 2. digital food and beverage marketing and associated targeted data practices; and 3. food and beverage marketing on educational technology platforms, including companies' efforts to collect and use children's data while they are in school or participating in virtual learning.

We also encourage you to include as key areas of consideration in the Conference topics that support hunger, nutrition, and overall health, such as food and infant formula safety, dietary supplements, food additives, antibiotic resistance, biotechnology, alcohol, and cross-cutting themes such as sustainability.

CSPI stands ready to work together with you to make these priorities a reality.

Sincerely,



Peter Lurie, MD, MPH
President
Center for Science in the Public Interest

ⁱ CSPI, your food and health watchdog, envisions a healthy population with reduced impact and burden of preventable diseases and an equitable food system that makes healthy, sustainable food accessible to all. CSPI is one of the nation's oldest independent, science-based consumer advocacy organizations.

ⁱⁱ Coleman-Jensen A, et al. *Household Food Security in the United States in 2020*. U.S. Department of Agriculture, Economic Research Service Economic Research Report 298. September 2021. <https://www.ers.usda.gov/webdocs/publications/102076/err-298.pdf?v=5485.5> Accessed May 19, 2022. See: Figure 5

ⁱⁱⁱ Government Accountability Office. *Chronic Health Conditions: Federal Strategy Needed to Coordinate Diet-Related Efforts*. September 2021. <https://www.gao.gov/products/gao-21-593>. Accessed May 19, 2022.

^{iv} Abrahams-Gessel S, et al. Implementing federal food service guidelines in federal and private worksite cafeterias in the United States leads to improved health outcomes and is cost saving. *J Public Health Pol*. 2022