



May 15, 2023

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

Dear President Biden,

The Center for Science in the Public Interest (CSPI)<sup>1</sup> commends your work in convening the White House Conference on Hunger, Nutrition, and Health last year and in developing the accompanying National Strategy. Of the nearly 200 nutrition-specific recommendations in the National Strategy, the vast majority (85 percent) do not require Congressional action. As a complement to these federal commitments, the administration has received over \$8 billion in private and public sector commitments.

Already, the National Strategy has lived up to its commitments to strengthen 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). For instance, the U.S. Department of Agriculture (USDA) increased SNAP benefits that were based on an outdated economic formula through a reevaluation of the Thrifty Food Plan as required by Congress, issued proposed rules to strengthen both the WIC food package and school meal nutrition standards, and currently implementing a permanent Summer Electronic Benefit Transfer (EBT) program to provide food assistance to eligible children during the summer months, as established by Congress.

Other commitments have yet to be realized. CSPI was pleased to see a number of commitments in the National Strategy to improve food labels, reduce excessive sodium and added sugars in our food supply, and updating and implementing the Food Service Guidelines for Federal Facilities (FSG). We'd like to see more focused action on these commitments:

1. The Food and Drug Administration (FDA) must prioritize issuing regulations establishing a mandatory front-of-package nutrition labeling system for foods sold in the United States that effectively and conveniently signals to consumers the nutritional quality of foods. CSPI filed a [petition](#) seeking this outcome in August 2022. We were pleased to see that the FDA has committed to front-of-package regulations in the National Strategy, however the FDA has not committed to making front-of-package labeling mandatory nor has it announced a timeline for promulgating regulations. Mandatory front-of-package labeling ensures that food companies cannot opt out of labeling, setting an equal playing field for all companies. Improved labels should apply to all packaged foods, from frozen fruits and vegetables to ultraprocessed food. Front-of-package systems that highlight when foods are high in salt, sugar, and saturated fat, which have been adopted by other countries, provide nutrition information in a quick and easy to understand format, and are proven to help people make healthier choices. Data from Chile show significant reductions in the purchase of sugars, saturated fat, and sodium after the country adopted a mandatory nutrient warning label policy and show that the food industry reformulated

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<sup>1</sup> 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.

foods in response to the policy, with significant reductions in sugar. Finally, mandatory front-of-package labeling is legal and within the FDA's authority, as we lay out in our [petition](#).

2. The FDA committed to furthering its efforts to reduce excessive sodium in our food supply by agreeing to pursue long-term sodium reductions that go beyond the 2.5-year targets established by the FDA in 2021. As encapsulated in a [petition](#) we filed with the FDA in April 2023, we urge the FDA to establish longer-term targets that align levels of sodium with the Dietary Guidelines for Americans. If fully achieved, these could prevent up to 475,000 cases of cardiovascular disease and save \$41 billion in healthcare costs over 20 years.<sup>2</sup> The FY2023 omnibus legislation provided the FDA with an additional \$1 million for implementation of the short-term sodium targets and to develop a monitoring and evaluation plan.
3. Similarly, the National Strategy commits to requesting additional information from the food industry about potential added sugars reduction, but needs to commit to establishing concrete across-the-board targets for added sugars reductions, analogous to those for sodium. CSPI and the New York City Department of Health and Mental Hygiene recently submitted a [petition](#) in April 2023 urging the FDA to set such voluntary added sugar reduction targets for foods and drinks.
4. The National Strategy commits to updating and implementing the Food Service Guidelines for Federal Facilities, but does not specify a policy mechanism or process for doing so. We urge the Biden administration to issue an Executive Order to update and require use of the 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, the FSG are evidence-based 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 federal government sells and serves food to millions of people in federal worksite cafeterias, national parks, hospitals for veterans, military facilities, and federal prisons. The executive order should also establish standards to align federal food purchasing with Biden Administration priorities including racial equity and mitigating climate change. We urge you to leverage the food purchasing power of the federal government to spur the healthy, sustainable, and just food system we desperately need.

Finally, while we applaud and are pleased to see the administration continue its engagement with the private and public sector to secure additional commitments that complement the National Strategy in its second round of solicitations, there are many areas where corporations, in particular, have not made or are unlikely to make such commitments.

CSPI reviewed all of the publicly available first-round corporate commitments posted on the National Strategy's [website](#) and compared them to the recommendations of the National Strategy to identify any gaps. We found there are no commitments related to front-of-package labeling or sodium and added sugars reduction, initiatives captured in the National Strategy.

We also compared commitments to CSPI's priorities which were not included in the National Strategy and found that there are no corporate commitments to improve nutrition for foods sold or served on federal property, improve the retail food environment through placement strategies (such as putting healthy food in place of unhealthy food in prominent areas of the retail food store), or reduce junk food marketing to children. Further, there are no commitments to improve access to healthier food for specific

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<sup>2</sup> Pearson-Stuttard J, Kypridemos C, Collins B, et al. Estimating the health and economic effects of the proposed US Food and Drug Administration voluntary sodium reformulation: Microsimulation cost-effectiveness analysis. *PLoS Med.* 2018;15:e1002551. Published 2018 Apr 10. doi:10.1371/journal.pmed.

populations such as indigenous communities or for people in prison. The National Strategy is also silent on sustainability, food safety, food additives, and dietary supplements, and consequently, so are the private sector commitments. We are happy to provide more information on our review of the commitments.

In conclusion, we urge the administration most urgently to issue regulations on mandatory front-of-package labeling, establish new voluntary sodium and added sugars reduction targets for industry, and issue an executive order on food service guidelines.

CSPI stands ready to work with you to make these recommendations a reality. We welcome a meeting with you to discuss these priorities.

Sincerely,

A handwritten signature in blue ink that reads "Peter Lurie". The signature is fluid and cursive, with a horizontal line underneath the name.

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

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