



April 2, 2025

The Honorable Jesse Gabriel
California State Assembly
1021 O Street, Suite 8230
Sacramento, CA 95814

RE: Support for AB 1264

Dear Assemblymember Gabriel,

The Center for Science in the Public Interest (CSPI) strongly supports your bill, AB 1264, which will protect children by directing state authorities to identify “particularly harmful” ultra-processed foods (UPFs) and phase them out from school meals.

CSPI has been working for over 50 years to identify the foods that cause harm, protect consumers from those foods, and fix the broken systems that allow those foods on the market. There is growing concern about UPFs, the consumption of which has been linked to certain chronic diseases like cancer and cardiovascular disease. There is a clear need for nutrition and public health authorities to take action to protect consumers—and especially children—from the subgroups of UPFs for which we have the strongest evidence of harm, like processed meats and sugar-sweetened beverages^{1,2,3}—both of which the 2020-2025 Dietary Guidelines for Americans already recommends limiting.⁴

By directing the Office of Environmental Health Hazard Assessment (OEHHHA) to identify the UPFs posing the greatest health risk, AB 1264 ensures that subsequent measures to protect children from such foods will be grounded in strong evidence and produce positive health outcomes. OEHHHA is a recognized public health authority with the relevant expertise to conduct these assessments, and it has a strong track record of rigorously, systematically, and transparently evaluating evidence linking food chemicals to adverse health outcomes.⁵

¹Cordova R, Viallon V, Fontvieille E, Peruchet-Noray L, Jansana A, Wagner KH, Kyrø C, Tjønneland A, Katzke V, Bajracharya R, Schulze MB, Masala G, Sieri S, Panico S, Ricceri F, Tumino R, Boer JMA, Verschuren WMM, van der Schouw YT, Jakšzyn P, Redondo-Sánchez D, Amiano P, Huerta JM, Guevara M, Borné Y, Sonestedt E, Tsilidis KK, Millett C, Heath AK, Aglago EK, Aune D, Gunter MJ, Ferrari P, Huybrechts I, Freisling H. Consumption of ultra-processed foods and risk of multimorbidity of cancer and cardiometabolic diseases: a multinational cohort study. *Lancet Reg Health Eur*. 2023 Nov 14;35:100771.

²Mendoza K, Smith-Warner SA, Rossato SL, Khandpur N, Manson JE, Qi L, Rimm EB, Mukamal KJ, Willett WC, Wang M, Hu FB, Mattei J, Sun Q. Ultra-processed foods and cardiovascular disease: analysis of three large US prospective cohorts and a systematic review and meta-analysis of prospective cohort studies. *Lancet Reg Health Am*. 2024 Sep 2;37:100859.

³Wang L, Steele EM, Du M, Luo H, Zhang X, Mozaffarian D, Zhang FF. Association Between Ultraprocessed Food Consumption and Mortality Among US Adults: Prospective Cohort Study of the National Health and Nutrition Examination Survey, 2003-2008. *J Acad Nutr Diet*. 2024 Nov 26:S2212-2672(24)00991-2.

⁴U.S. Department of Agriculture and U.S. Department of Health and Human Services. *Dietary Guidelines for Americans, 2020-2025*. 9th Edition. December 2020. Available: <https://www.dietaryguidelines.gov/>.

⁵Office of Environmental Health Hazard Assessment, California Environmental Protection Agency. *Health Effects Assessment: Potential Neurobehavioral Effects of Synthetic Food Dyes in Children*. April 16, 2021. Available: <https://oehha.ca.gov/media/downloads/risk-assessment/report/health-effects-assess041621.pdf>.



Millions of California's children rely on school meals for their nutrition. In Fiscal Year 2024, 3.3 million children participated in the national school lunch program in California,⁶ and nearly 900 million meals were served to California's children including breakfast and lunch.^{7,8} It is imperative that California eliminate particularly harmful UPFs from school meals to protect children's health.

AB 1264 will build on the foundation laid by AB 418 (Gabriel) and AB 2316 (Gabriel), giving the state another opportunity to make California's children's health a top priority.

CSPI thanks you for your leadership and is pleased to support AB 1264.

Sincerely,

Thomas M. Galligan, PhD
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Center for Science in the Public Interest

⁶ Food and Nutrition Service, U.S. Department of Agriculture. *National School Lunch Program: Total Participation*. March 14, 2025. Available: <https://fns-prod.azureedge.us/sites/default/files/resource-files/01slfypart-3.pdf>.

⁷ Food and Nutrition Service, U.S. Department of Agriculture. *National School Lunch Program: Total Lunches Served*. March 14, 2025. Available: <https://fns-prod.azureedge.us/sites/default/files/resource-files/05slmeals-3.pdf>.

⁸ Food and Nutrition Service, U.S. Department of Agriculture. *School Breakfast Program: Total Breakfasts Served*. March 14, 2025. Available: <https://fns-prod.azureedge.us/sites/default/files/resource-files/09sbmeals-3.pdf>.