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SNAP Retailer Policy Division
Food and Nutrition Services, U.S. Department of Agriculture
1320 Braddock Place
Alexandria, VA 22314

Comment on Updated Staple Food Stocking Standards for Retailers in the Supplemental Nutrition Assistance Program; Proposed Rule (Docket No. FNS-2025-0018)

The Center for Science in the Public Interest (CSPI) submits these comments in response to the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) request for comments on its proposed rule to update staple food stocking standards for retailers in the Supplemental Nutrition Assistance Program (SNAP).

CSPI is a non-profit consumer education and advocacy organization that has worked since 1971 to improve the public's health through better nutrition and food safety. CSPI helped to lead efforts to win passage of the Nutrition Labeling and Education Act, the Healthy, Hunger-Free Kids Act, the Food Safety Modernization Act, chain restaurant menu labeling, and the Food Allergen Labeling and Consumer Protection Act. CSPI also publishes Nutrition Action (NA) and is supported by the subscribers to NA, individual donors, and foundation grants. CSPI is an independent organization that does not accept any corporate donations. CSPI is a strong advocate for increasing access to healthy food, especially through federal nutrition assistance programs. For more than a decade, CSPI has advocated for SNAP retailer staple food stocking standards to include a greater variety of products and to incorporate nutrition requirements to increase access to healthy food for children and families who participate in SNAP as one of many strategies needed to promote healthier diets and reduce income-based health disparities in the U.S.

Staple food stocking standards are minimum food inventory requirements that Congress and FNS have established to ensure that the more than 260,000 SNAP-authorized retailers¹ carry a minimum variety of foods. Currently, SNAP retailers must sell at least three varieties (*i.e.*, distinct product types) of foods from each of four “staple food” categories (fruits and vegetables, grains, dairy, and protein), for a total of 12 staple food varieties. Retailers must stock at least 3 items within each of the 12 staple food varieties resulting in a total of 36 stocking units that meet USDA requirements. FNS also requires that a certain number of the staple food varieties be “perishable foods” (*i.e.*, fresh produce, frozen or refrigerated items, or any food items that would spoil or significantly deteriorate in quality within three weeks if stored at room temperature).² FNS distinguishes between “staple foods” (*i.e.*, basic foods that make up a large part of a person’s diet and are usually cooked at home and eaten as a meal)³ and accessory foods (*i.e.*, snacks, desserts, and foods that complement or supplement meals).⁴ Only staple foods count toward minimum stocking standard requirements.

The 2014 Farm Bill directed FNS to update the SNAP stocking standards by increasing the minimum number of varieties and perishables that SNAP retailers are required to carry.⁵ FNS issued a final rule to implement this directive in 2016.⁶ However, an appropriations rider⁷ that the convenience store trade association successfully lobbied Congress to include in the 2017 appropriations bill⁸ (and each subsequent appropriations package to date) has prevented FNS from implementing the portions of the 2016 rule regarding “Breadth of Stock” and “Variety” until FNS makes specific updates to its regulations.

The proposed rule that is the subject of this comment seeks to satisfy the requirements of the appropriations rider so that FNS can finally implement updates to the stocking standards. In the proposed rule, FNS states that the goals of its rulemaking include ensuring that:

1. SNAP retailers carry a larger variety of food options (than currently required)
2. The requirements can be operationalized in an efficient and cost-effective manner
3. The variety framework does not undercut Congress’s intent to make the stocking standards more rigorous so that unscrupulous retailers are not able to gain entry into SNAP for the sole purpose of defrauding the program

CSPI supports FNS’s proposal to increase the variety of food options at SNAP retailers by increasing the minimum number of staple food varieties that SNAP retailers must carry from three varieties for each of the four staple food categories (12 total varieties) to seven varieties for each category (28 total varieties).

However, neither the current SNAP retailer staple food stocking standards nor the updated standards in the proposed rule include nutrition standards (e.g., limits on added sugar, sodium, saturated fat, and refined grains) for foods to count towards minimum inventory requirements. At present, the proposed rule represents a missed opportunity to leverage stocking standards towards achieving the goal, as articulated in the Make America Healthy Again (MAHA) Commission’s Make Our Children Healthy Again Strategy Report, of “reorient[ing] the [SNAP] program towards better nutrition.”

In this comment, we provide recommendations on areas of the proposed rule that should be strengthened and we highlight aspects of the proposed rule that should be maintained.

We recommend FNS strengthen the proposal by:

- Including nutrition requirements for foods to align with a healthy dietary pattern
- Treating butter and cooking oils the same so that both are considered accessory foods instead of allowing butter to count toward the minimum number of staple food varieties in the dairy category
- Providing more support for small and independent retailers for implementing the updated standards

We agree with several aspects of FNS's proposal that support healthy food access, including:

- Adopting a new food staple variety framework that will more than double the number of different staple food items required at SNAP retailers (from 12 to 28 stocking units)
- Continuing to allow a limited number of plant-based alternatives in the dairy group
- Clarifying that pre-cut fruits and vegetables can count towards the fruit and vegetable category requirements
- Adding nuts/seeds and beans, peas, and lentils to count towards the protein category and considering them to be separate varieties
- Adding snack bars, jerky, and cheese/fruit dips and spreads to the list of accessory foods that cannot count as staple foods.

Our detailed comments follow.

1. FNS should add nutrition requirements to the SNAP staple food stocking standards

We recommend that FNS require all 28 proposed staple food varieties meet nutrition requirements so that shoppers using SNAP will have access to a minimum variety of foods aligned with a healthy dietary pattern. Our recommended approach for establishing nutrition requirements is for FNS to not allow any products that are high in added sugar, sodium, or saturated fat (*i.e.*, that contain $\geq 20\%$ Daily Value of any of these per serving, which applies the U.S. Food and Drug Administration's definition of "high" nutrient content)⁹ to count toward the minimum number of staple food varieties, and to require that the seven staple food varieties in the grain category must each be more than 50% whole grain.¹⁰

As presently drafted, this proposed rule would not do enough to promote access to healthy options for shoppers using SNAP. Table 1 below shows examples of perishable and non-perishable products from each staple food category that are high in added sugar, sodium, saturated fat, and refined grains but could allow a retailer to fulfill the proposed staple food stocking standards. Table 2 shows an alternative set of perishable and non-perishable healthier foods that would fulfill the staple food stocking standards if FNS applied our approach to establishing nutrition requirements, as described in the previous paragraph. These tables illustrate the importance of aligning staple food stocking standards with nutrition requirements in order to promote better nutrition through SNAP.

In terms of operationalizing standards that are aligned with nutrition requirements, a majority of SNAP benefits (86%) are redeemed at large retailers that would easily meet the proposed stocking standards with our recommended nutrition requirements included.¹¹ However, 44% of SNAP-authorized retailers are convenience stores, where only 5.2% of SNAP benefits are redeemed.¹² Convenience stores have fewer fruit and vegetable, whole grain, and dairy products compared to larger retailers and predominantly sell foods that are high in added sugar, sodium, saturated fat, and refined grains.^{13,14} Adding nutrition requirements to staple food stocking standards would ensure that SNAP shoppers are able to access healthy food no matter where they shop. Furthermore, a national survey of SNAP participants found that people participating in the program want more healthy choices at stores. In the survey, 79% of respondents supported

requiring SNAP-authorized stores to stock a wider selection of healthy foods and beverages.¹⁵ Adding nutrition requirements to staple food stocking standards ensures that all retailers, regardless of size, carry a variety of nutritious items to help all shoppers, especially those for whom convenience stores are a primary source of food access, can achieve a healthy diet.

Table 1. Example set of products with unhealthy attributes that could fulfill the SNAP retailer staple food stocking standard requirements under USDA's proposed rule*

Staple Food Category	Product	% Daily Value		
		Saturated Fat	Sodium	Added Sugars
Fruits and Vegetables	Progresso Vegetable Classics Minestrone Soup	0%	30%	2%
	Del Monte Yellow Cling Peach Halves in Heavy Syrup	0%	0%	32%
	Mott's Mango Peach Applesauce	0%	0%	24%
	Ocean Spray Craisins Original Dried Cranberries,	0%	0%	52%
	Birds Eye Cheesy Potato Casserole, Frozen Side	20%	20%	1%
	Green Giant Simply Steam Creamed Spinach	8%	20%	6%
Grains	Private Selection Sliced Frozen Strawberries in Sugar	0%	0%	55%
	Annie's Organic Cheesy Ravioli	0%	26%	10%
	Pepperidge Farm Brown Sugar Cinnamon Pre-Sliced Mini Bagels	5%	18%	32%
	Green Giant Simply Steam Cheesy Rice & Broccoli	3%	38%	0%
	Kroger Buttermilk Waffles	4%	22%	2%
	Post Fruity PEBBLES Cereal, Gluten-Free, 10 Vitamins/Minerals, Sweetened Rice Cereal	0%	8%	25%
Dairy	Quaker Instant Oatmeal, Maple Brown Sugar	3%	11%	24%
	Campbell's Condensed Beef Soup with Vegetables and Barley	3%	39%	0%
	Horizon Organic Shelf Stable 1% Lowfat Chocolate Milk Boxes	8%	8%	20%
	Prairie Farms Dairy, Premium Strawberry Milk	23%	5%	30%
	Noosa Cinnamon Roll Yoghurt	40%	7%	36%

Protein	So Delicious Dairy Free Raspberry Coconut Yogurt Alternative	20%	1%	34%
	Kraft Sharp Cheddar Cheese	30%	8%	0%
	bettergoods Plant-Based Cheddar Shredded Dairy-Free Cashew Cheese Alternative	30%	9%	0%
	LALA Probiotic Protein Yogurt Smoothie Drink, Low Fat, Strawberry	5%	4%	22%
	Jimmy Dean Fully Cooked Original Pork Sausage Patties	45%	20%	0%
	SPAM Classic Canned Meats	30%	33%	2%
	Great Value Chunk Chicken Breast with Rib Meat in Water	0%	30%	0%
	Bush's Brown Sugar Hickory Baked Beans	0%	25%	22%

*Cells shaded in red indicate a product contains $\geq 20\%$ of the Daily Value for a given attribute. Nutrition facts were obtained via product listings on manufacturer and retailer websites.

Table 2. Example set of healthy food products that could fulfill the SNAP retailer staple food stocking standard requirements if USDA adopts CSPI's nutrition requirement recommendation*

Staple Food Category	Product	% Daily Value		
		Saturated Fat	Sodium	Added Sugars
Fruits and Vegetables	Green Giant Simply Steam Baby Vegetable Medley	0%	11%	2%
	Mott's No Sugar Added Applesauce Mango Peach	0%	0%	0%
	Amy's Organic Chunky Tomato Bisque, Light in Sodium	13%	12%	16%
	Del Monte No Sugar Sliced Bartlett Pears	0%	0%	0%
	Ocean Spray Craisins 50% Less Sugar Dried Cranberries	0%	0%	16%
	Birds Eye Steamfresh Steakhouse Green Beans	0%	13%	0%

Grains	Uncle Ben's Whole Grain Brown Rice	0%	0%	0%
	Kodiak Protein-Packed Buttermilk and Vanilla Power Waffles	8%	13%	8%
	DeLallo Organic Whole Wheat Linguine	1%	1%	0%
	Thomas' 100% Whole Wheat Bagels	3%	15%	12%
	Quaker Lower Sugar Instant Oatmeal Maple and Brown Sugar	3%	10%	8%
	Success Boil-in-Bag Quinoa, Tri-Color	0%	0%	0%
	Quaker Quick Pearl Barley	0%	0%	0%
Dairy	Horizon Organic Shelf Stable 1% Lowfat Milk Boxes	3%	6%	0%
	Great Value Mild Cheddar Deli Style Sliced Cheese	18%	5%	0%
	Activia ZERO 0g Added Sugar Strawberry Banana Probiotic Dailies Low Fat Yogurt Drinks	5%	2%	0%
	fairlife Lactose Free Reduced Fat Chocolate Ultra Filtered Milk	15%	12%	12%
	Silk Vanilla Soy Milk	3%	4%	16%
	Miyoko's Creamery Cashew Milk Cream Cheese Classic Plain	13%	5%	0%
Protein	Great Value Premium White Chicken, Shelf-Stable, Fully Cooked, Ready to Eat	0%	16%	0%
	Bush's Sidekicks Southwest Zest Pinto Beans	0%	18%	0%
	Applegate Naturals Chicken & Maple Breakfast Sausage Links	10%	17%	4%
	Amy's Organic Lentil Soup, Light in Sodium	5%	12%	0%
	Butterball Frozen Turkey Burgers, All Natural White, 1/4 lb Patties	15%	12%	0%
	Tyson Frozen Grilled Chicken Breast Strips	3%	16%	0%

Nutrition facts were obtained via product listings on manufacturer and retailer websites.

2. FNS should recategorize butter as an accessory food

In the proposed rule, FNS classifies butter as a staple (dairy) food but classifies vegetable oil, olive oil, shortening, lard, safflower oil, and any other solid or liquid cooking oils or fats as accessory foods. This presents a dilemma as butter is both dairy and an accessory food. Since butter competes against accessory foods, CSPI strongly encourages FNS to reclassify butter as an accessory food, rather than a staple food. Butter should not be allowed to count toward the minimum number of staple food varieties in the dairy category while other fats with more desirable nutritional profiles are relegated to the “accessory” category and do not count toward the permitted number of varieties. Notably, butter is high in saturated fat and is not a healthy source of nutrients. Butter does not meet FNS’s definition of a staple food (*i.e.*, a food that makes up a large part of a person’s diet) and *does* meet FNS’s proposed definition for accessory foods (*i.e.*, foods meant to complement or supplement meals, or food used primarily in the meal preparation process). FNS should consider all cooking oils and fats to be accessory foods.

3. FNS should provide more implementation support for small and independent retailers to comply with updated stocking standards

CSPI believes that retailers are able to meet stocking standards that include nutrition requirements and increased variety requirements. However, CSPI also believes that for this to be feasible, FNS must ensure that the final rule includes technical assistance, a phase-in period for implementation for small and independent retailers, time-limited hardship waivers for small retailers demonstrating significant challenges to meeting the standards, and other supports for small and independent retailer implementation to ensure that retailers are able to comply and to prevent the unintended consequence of SNAP retailer dropout.

The majority of small retailers are already meeting or exceeding proposed rule stocking standards in two (fruits and vegetables and grains) of the four categories.¹⁶ For the protein and dairy standards that small retailers are not already meeting, the proposed rule expands flexibilities for meeting the increased variety requirement in these categories. For example, in protein, nuts and seeds, beans, peas, and lentils would count as distinct protein varieties. For dairy, perishable liquid milk, shelf-stable liquid milk, dried or powdered milk, and fermented or cultured dairy beverages would count as distinct dairy varieties.

Some small retailers will need to make changes to their sourcing and stocking practices and might not be immediately able to meet expanded stocking requirements, even with the phase-in period. Allowing small food stores experiencing significant challenges (such as identifying new suppliers, purchasing and making space for refrigeration, etc.) to apply for timebound waivers would provide flexibility and time for stores to update operations to reach compliance, mitigating SNAP retailer dropout.

Additionally, the existing Need for Access provision allows SNAP authorization of stores that do not meet stocking standards in “an area where SNAP clients have significantly limited access to food.”¹⁷ Maintaining the Need for Access consideration will be critical to mitigate SNAP retailer

dropout, especially in rural areas where small and independent SNAP-authorized retailers may play an outsized role.

Research also shows that smaller stores would be capable of complying with stocking standards that include nutrition requirements, especially if FNS provided technical assistance.¹⁸ Technical assistance including procurement, stocking, and marketing resources (e.g., toolkits, tip sheets, videos, webinars) could be made widely available to retailers through a technical assistance center led by associations, trade organizations, businesses, or nonprofits in the field.

Additionally, grants could be made available to small retailers to cover direct costs (e.g., increased stock of produce) or indirect costs (e.g., coolers/freezers to store increased stock of produce, promotional materials to increase consumer awareness of and demand for increased stock of produce) associated with expanding stock of staple foods.

Some comments on the proposed rule will likely underscore that, if too stringent, strengthened retailer standards could decrease retailer participation in SNAP. It is imperative that FNS adopt a rule that simultaneously improves *healthy* food access while preserving *overall* food access. The recommendations CSPI outlines in this comment strive to achieve this balance, considering both retailer feasibility and public health impact.

4. FNS should preserve aspects of the proposed rule that support healthy food access

a. We agree with the proposal to adopt a new staple food variety framework that will more than double the number of different staple food items required at SNAP retailers

CSPI supports FNS updating the staple food variety framework such that the minimum number of staple food varieties that SNAP retailers must carry will increase from three varieties from each of the four staple food categories (12 total varieties) to seven varieties from each category (28 total varieties), thereby increasing SNAP shoppers' access to a variety of foods, including more fresh options.

b. We agree with the proposal to continue allowing a limited number of plant-based alternatives in the dairy group

CSPI supports FNS's proposal to continue allowing plant-based alternatives to count towards the dairy category but to limit the number of plant-based alternatives that may count toward this category to three of seven total varieties. This will encourage SNAP retailers to carry plant-based alternatives for milk, cheese, and yogurt, while ensuring that retailers carry a range of nutrient-dense products in the dairy category. Many consumers prefer plant-based dairy alternatives because they are vegan, lactose intolerant, or allergic to dairy. However, many dairy alternatives lack key nutrients (vitamin D, calcium, potassium, protein, vitamin B-12, vitamin A, magnesium, riboflavin) found in cow's milk and some other dairy foods.¹⁹ Restricting the number of plant-based alternatives that count as acceptable dairy staple foods is appropriate considering that the 2020–2025 Dietary Guidelines for Americans and the 2025 Dietary Guidelines Advisory Committee recommend only fortified soy milk as a suitable alternative for cow's milk due to the

differing nutrient profiles of other plant-based milk alternatives. Additionally, studies of non-dairy cheeses and yogurts available in the U.S. marketplace have found that there are substantial differences in the nutritional profiles of these products compared to dairy cheese and yogurt. A recent evaluation of 245 non-dairy plant-based cheese alternatives found that a majority of these products were high in saturated fat, low in protein, and low in fortified calcium, vitamin D, and vitamin B₁₂.²⁰ A separate analysis of 622 dairy and non-dairy plant-based yogurts reported that plant-based yogurts had, on average, less protein, sodium, total sugar, calcium, and potassium than dairy yogurts, and coconut yogurts specifically had significantly higher saturated fat than all other dairy and plant-based yogurts analyzed.²¹ FNS's proposed restriction appropriately balances SNAP customers' potential preferences for plant-based alternatives in the dairy group with the broader goal of promoting nutritious foods in SNAP.

c. We agree with the proposal to clarify that pre-cut fruits and vegetables can count towards the fruit and vegetable category requirements

CSPI supports USDA's decision to clarify that cold pre-cut fruits and vegetables intended for home consumption can count as staple foods in the fruit and vegetable category. Inclusion of these foods will provide SNAP shoppers' with more convenient, affordable, healthy options.

d. We agree with the proposal to add nuts/seeds and beans, peas, and lentils to count towards the protein category and considering them separate varieties

CSPI agrees with FNS's decision to include nuts/seeds, beans, peas, and lentils as possible varieties within the protein category and to consider them as separate varieties, allowing retailers more flexibility for how to meet the protein requirement. Legumes are an affordable, nutrient-rich source of protein that is high in fiber. Most Americans do not get enough fiber,²² and diets higher in fiber are associated with reduced risk of some diet-related diseases including type 2 diabetes and heart disease.²³

e. We agree with the proposal to add snack bars, jerky, and cheese/fruit dips and spreads to the list of accessory foods that cannot count as staple foods

Clearer delineation of snack and staple foods will help ensure that stocking standards are used for their intended purpose—to ensure SNAP retailers carry a broad variety of foods in each category—and prevent convenience stores from attempting to meet the standards with unhealthy snack foods. CSPI is pleased to see that the agency is adding snack bars, jerky, and cheese or fruit dips and spreads to the list of accessory foods that do not count toward staple foods. In 2019, CSPI submitted a comment in response to the agency's request for information on docket number FNS-2019-0003, "Providing Regulatory Flexibility for Retailers in the Supplemental Nutrition Assistance Program".²⁴ In the comment, CSPI urged FNS to clarify that all snacks, not just some, count as accessory foods and therefore do not qualify as staple foods. This would alleviate confusion and potential misinterpretation of what does and does not count as a staple food. For example, in the 2016 final rule, beef jerky is listed as a possible variety of beef even though it is clearly a snack food and not likely to be a "major component of a meal." Jerky is a

protein source that is typically high in sodium (and sometimes added sugar), whereas other staple foods in the protein category are high in protein without the added unhealthy nutrients.

Thank you for the opportunity to provide comments on this proposal from FNS to help strengthen the SNAP stocking standards and increase healthy food access for the nearly 42 million people who participate in SNAP.

Sincerely,



Joelle Johnson, MPH
Deputy Director



Sara John, PhD
Deputy Director



Eva Greenthal, MS, MPH
Senior Policy Scientist



Alla Hill, PhD, RD
Senior Science Policy Associate

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