



## **Nutrition Priorities for the U.S. Food and Drug Administration**

This document lists recommendations developed by the NANA Coalition for FDA actions to promote good nutrition and improve the healthfulness of the U.S. food supply.

### Front-of-Package Nutrition Labeling

- Issue a final rule adopting mandatory front-of-package nutrition labeling.
- The final rule should shift to “High In”-style front-of-package labels or, less desirably, a modified version of the proposed “Nutrition Info” label that more clearly highlights when a product has a “high” level of a nutrient.
- The front-of-package labeling system should focus on the three nutrients to limit: added sugars, sodium, and saturated fat. Nutrients to encourage (e.g., fiber, calcium) should not be included.
- The final rule should also require a disclosure on products containing non-nutritive sweeteners stating: “Contains non-nutritive sweeteners: Not recommended for children.”

### Sodium

- Issue final guidance to industry with strong [Phase II voluntary sodium reduction targets](#).
- Rigorously evaluate and provide public reports on industry progress on [Phase I sodium reduction targets](#).
- Consider mandatory sodium reduction targets if industry does not meet the Phase II voluntary targets by a specified deadline.

### Added Sugar

- Issue guidance to industry for voluntary targets to lower added sugars across the food supply (including both packaged food and restaurant food).
- Issue a rulemaking to update the required nutrition information at chain restaurants to include added sugars.
- Issue guidance or regulations defining and authorizing “low added sugar” claims on products containing  $\leq 5\%$  Daily Value of added sugars per serving.

### Ultra-Processed Foods

- Develop a definition of “ultra-processed food” for regulatory purposes.
- The policy goal of developing a new definition should be to identify foods that scientific evidence shows are clearly linked to health concerns so that government policies can assist people with limiting those foods in their diets and making healthier food choices.

### Ingredients and Additives

- Issue a rulemaking to reform the food chemical safety review process and close the “GRAS” loophole, including transparent substantiation of safety claims and premarket FDA review of all future GRAS self-determinations.

- Finalize and implement an enhanced system for conducting post-market safety assessments of food chemicals that improves rigor, data quality, transparency, and public engagement and maximizes public health protection.
- Issue a rulemaking to mandate full disclosure of flavors and spices instead of vague terms like “natural flavor,” “artificial flavor,” or “spices.” We recognize that compound flavors can contain more than 100 individual ingredients, making full on-pack disclosure logistically challenging. Thus, full disclosure mandates could allow online disclosure, but should favor on-pack disclosure.
- Issue guidance encouraging restaurants to make full ingredient lists for all menu items publicly available, including by tracking which chains do and do not provide access to full ingredient information online.
- Explore potential new requirements for companies to publicly disclose the technical function of each ingredient in a food product, including whether such disclosure should appear on food labels or online, what authority the agency could use to require such disclosure, and how consumers would use and understand the new information.

#### Healthy Claims

- Maintain strong, evidence-based nutrition standards for the “FDA Healthy” claim, including healthy food group requirements and limits for added sugars, sodium, and saturated fat.
- Develop a “FDA Healthy” icon and encourage manufacturers to use this voluntary label on foods that meet the FDA healthy definition.
- Issue guidance advising retailers on how to identify foods that meet the FDA healthy definition and encourage retailers to only stock FDA healthy items in highly visible areas like checkout aisles and endcaps and to incorporate healthy filters for online grocery shopping where shoppers can choose to only shop amongst FDA healthy items.
- Conduct a consumer education campaign to increase awareness of the claim and explain how it can be used to select foods and beverages that contribute to a healthy dietary pattern.

#### Online Labeling

- Issue guidance with best practices for online nutrition and ingredients labeling for retailers and manufacturers selling food online.

#### Toddler Beverages

- Prohibit the use of the term “formula” on products marketed for children over 12 months old.
- Establish labeling requirements for toddler beverages, including a statement of identity such as “sweetened milk-based drink powder for 12- to 36-month olds,” to help caregivers understand the nutritional differences between sweetened toddler beverages and healthier choices like plain cow’s milk.
- Require front-of-package disclosures on beverages marketed for children aged 12-24 months that contain added sugars, such as: “This product contains added sugars. The Dietary Guidelines for Americans recommends avoiding food and beverages with added sugars for children younger than age 2.”

## **About the National Alliance for Nutrition and Activity (NANA)**

These recommendations were developed by the National Alliance for Nutrition and Activity (NANA) coalition. NANA is the nation's largest nutrition advocacy coalition comprised of over 500 national, state, and local organizations, and 14 member Steering Committee consisting of: 1,000 Days, Academy of Nutrition and Dietetics; American Academy of Pediatrics; American Cancer Society Cancer Action Network; American Heart Association; American Public Health Association; Association of State Public Health Nutritionists; Center for Science in the Public Interest; International Fresh Produce Association; National Association of Chronic Disease Directors; National WIC Association; Nemours Children's Health System; Trust for America's Health, and UnidosUS.

NANA envisions a country where everyone has access to adequate, affordable, culturally appropriate, and nutritious food; where the food environment promotes healthy eating; in which evidence-based nutrition policy is the basis of food policies and programs; and in which physical activity is promoted. NANA is committed to carrying out this work with a particular focus on reaching priority populations, starting from the earliest years, eliminating health disparities, and advancing racial justice. These systemic changes will reduce the illnesses, diseases, disabilities, premature deaths, and costs associated with diet and inactivity. Our efforts include advocating for strong public policy and program funding such as for federal nutrition programs, supporting effective education programs, and promoting structural and policy approaches to help the public eat better and be more active. [www.NANACoalition.org](http://www.NANACoalition.org).

For more information, please contact [policy@cspi.org](mailto:policy@cspi.org).

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