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Ambassador Susan Rice  
Director  
White House Domestic Policy Council  
Washington, DC 20500

**Re: SFPA comments for the White House Conference on Hunger, Nutrition and Health**

Dear Ambassador Rice:

[Sustainable Food Policy Alliance](#) (SFPA) member companies Danone North America, Mars, Incorporated, Nestlé USA, and Unilever United States appreciate this opportunity to share our comments in advance of the White House Conference on Hunger, Nutrition, and Health. We applaud the Biden Administration and congressional leaders for their work to convene the public and private sectors for this effort to accelerate new solutions to meet the goal of ending hunger and increasing healthy eating and physical activity by 2030 to curb diet-related diseases like type 2 diabetes, obesity, and hypertension.

Launched in 2018, SFPA seeks to accelerate the pace of change in the food industry through individual company leadership and collective support for public policies that raise the bar and inspire action.<sup>1</sup> As some of the world's largest food companies, we recognize our responsibility to drive positive change for the people who use our products, the people who produce them, the communities in which we operate, and the planet on which we all rely. As part of this mission, we strive to make foods that support healthy, balanced lives and ensure the sustainability and resiliency of the supply chain.

SFPA's recommendations speak to the three pillars of the conference where we have the most experience and have actively championed policy change: 1) improving food access and affordability; 3) empowering consumers to make and have access to healthy choices; and 5) enhancing nutrition and food security research.

Based on our experience, we recommend the National Strategy coming out of the Conference prioritize the following:

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<sup>1</sup> A full list of SFPA's policy priorities is available at [foodpolicyalliance.org](https://www.foodpolicyalliance.org).

- The strengthening of children’s nutrition assistance programs to prevent hunger and improve nutrition security throughout childhood, including built-in program flexibilities to ensure they are effective in all situations while maintaining strong nutrition standards.
- The development of dietary guidelines that provide inspiration for food innovation; include foods that reflect a wide range of healthful and sustainable diets across all cultures; and account for the connections among climate change, public health, and food security.
- Adequate annual funding for government agencies to engage in comprehensive consumer education, dietary surveys, and research related to healthy diets and nutrition across the lifespan that include increased representation of children and racial and ethnic minorities.

As part of our ongoing work, SFPA actively supports efforts by the U.S. Food and Drug Administration, U.S. Department of Agriculture, and lawmakers to improve food access, remove barriers to innovation in healthier foods, educate consumers on appropriate portion sizes, and support education efforts that help all Americans eat healthier diets. We have called for stronger and more flexible anti-hunger programs and for empowering consumers to make informed choices. Meanwhile, SFPA is also committed to strengthening voluntary, industry-wide standards governing responsible marketing and improving the nutrition of foods marketed to families and children. We are working with policymakers on ways to improve resiliency throughout the food supply chain, including through the adoption of climate-smart policies that reduce pressure on natural resources, efforts to expand regenerative agricultural practices, support for food system workers, and food waste reduction initiatives.

We also aim for our individual corporate actions to reflect our policy priorities through SFPA. For example, all four SFPA member companies participate in the Children’s Food and Beverage Advertising Initiative (CFBAI) and have voluntarily committed that in advertising primarily directed to children we will either not advertise foods or beverages to children at all or advertise only products that meet CFBAI’s strict Uniform Nutrition Criteria. Member companies have also individually taken other actions, as they deem appropriate for product portfolios, that reflect SFPA nutrient, information availability, and/or other priorities.

SFPA and its member companies are pleased to continue to be partners in the process of reducing hunger and diet-related diseases in America. Food technology expertise will be critical to the creation of successful nutrition and hunger focused activities. We appreciate the opportunity to comment on the conference pillars and look forward to further engagement with the Biden Administration and across the federal government on this important effort.

### **Pillar 1: Improving Food Access and Affordability**

The government should ensure access to nutritious, affordable foods and beverages in conjunction with health education to improve the current and future health status of children

and families. Federal nutrition programs are a first defense against food insecurity. The COVID-19 pandemic highlighted the need for adequate funding and programmatic flexibilities for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), the Supplemental Assistance Nutrition Program (SNAP) and school meals programs. USDA and Congress must build on the flexibilities and other lessons learned during the pandemic to strengthen these programs going forward, and lawmakers should move ahead with Child Nutrition Reauthorization to further these goals.

Year-round access to school meals that meet recommendations set by the Dietary Guidelines for Americans (DGAs) is central to any efforts to enhance feeding programs. Schools need the resources, guidance, and support to develop menus that reflect the nutritional needs and taste preferences of children and to provide education on nutrition and its relationship to overall health. These activities also support increased nutrient intake and minimize plate waste in schools. Similarly, USDA should continue to look for ways to remove barriers to expanding access for free and reduced-price meals, including expanding the Community Eligibility Program and making permanent the Summer EBT program.

What's more, Congress and USDA should strengthen and modernize the WIC program to expand coverage for children up to six years of age as well as increase postpartum eligibility and flexibility to certify infants for a full two-year period. Further, policy makers should establish a regulatory framework and implementation processes to allow WIC participants to use online ordering, home delivery, and self-checkout to purchase eligible foods, improving convenience, safety, and equitable access for participants in the program. USDA should also look at ways to include new appropriate products in the WIC program, providing more timely updates to reflect the ever-evolving food marketplace. Finally, the program needs flexibility to maintain a steady supply of key foods for infants and children, including infant formula.

### **Pillar 3: Empowering Consumers to Make and Have Access to Healthy Choices**

To make the best decisions for their health and the health of their families, consumers need to have access to information that reflects the latest science on nutrition. Rather than simply encouraging consumers to limit or avoid foods, companies and government should work together to empower and educate consumers about specific, actionable steps to adopt a balanced, healthy diet and lifestyle. Congress must provide adequate annual funding to FDA and USDA to facilitate comprehensive consumer education related to healthy diets and nutrition and ensure those messages are effective.

There are activities underway at FDA that would meaningfully increase consumer access to information and inspire innovation, and we urge the agency to act quickly to finalize these efforts. Specifically, in the short term the Biden Administration should:

- Finalize the revised criteria for the definition of “healthy.” FDA’s approach to “healthy” should be based on the most recent DGAs and, beyond a single icon or symbol, focus more broadly on encouraging foods and meals that fit within a healthy eating pattern.

- Encourage companies to meet the voluntary sodium reduction targets for food products and closely monitor industry progress in meeting them. SFPA has been a strong advocate for FDA’s voluntary sodium reduction targets and has long held that food companies can and should do more to reduce sodium in food products.
- Enact recommendations in the Nutrition Innovation Strategy to develop standards of identity that provide more flexibility for innovation in the development of healthful products that better reflect the DGAs.
- Revise nutrient content claims regulations to align with recent changes to the Nutrition Facts Panel as a result of the agency’s work on Nutrition Label Reform.

In the longer term, FDA should seek ways to ensure information related to food reflects the latest science and innovation, is consistently presented, and is relevant to consumers and healthcare professionals. FDA should also work to ensure labeling efforts for new technologies are easily understood, support consumer confidence, and encourage further innovation.

Strong, transparent, and science-based DGAs in tandem with consumer research must serve as the foundation for government nutrition efforts as well as inspiration for food innovation. While the current DGAs process rests strongly on the latest available science on nutrition and health, it could be improved by better accounting for a wide range of healthful diets across all cultures and the connections among climate change, public health, and food security. The 2025 revision of the DGA should reflect these important issues. Furthermore, robust consumer research should be integrated into implementing new policies and regulations that reflect the DGAs and the government’s public health priorities.

#### **Pillar 5: Enhancing Nutrition and Food Security Research**

An all-of-government approach is needed to successfully improve food access and affordability, empower consumers to make and have access to healthy choices, and enhance nutrition and food security research. This will require resources, funding and staff for FDA, USDA, and other food-related agencies, and improved interagency communication of activities, research funding, and priorities.

Strong engagement within government can enhance and sharpen research in food science and nutrition research that reflects the cultural diversity of Americans, supports innovation for healthier products, and encourages competition within the sector. It should also assist in efforts to impart equity in the food landscape that incorporates current DGAs, infrastructure opportunities, and innovative business models, such as grocery delivery programs and urban agriculture projects, focusing attention on those areas experiencing high levels of food insecurity. Further, a government-wide approach built on strong internal alignment, communication and information sharing will make it easier for agencies to partner with food companies and other stakeholders to tackle nutrition related challenges, and work across public and private institutions to develop solutions.

As food companies that reach millions of consumers each day, we have knowledge and expertise that can be helpful to the Biden Administration as it moves forward with this process. SFPA would welcome the opportunity to share relevant consumer, food technology, and marketplace insights as agencies undertake nutrition-related activities. Working together, we can accelerate decision-making and activities to improve the food we eat.

### Conclusion

Thank you for the opportunity to provide comments on the National Strategy and renewed efforts to tackle these important issues. SFPA welcomes opportunities to use our reach in ways that create shared value for consumers, government, and our companies on the path towards improved public health. We look forward to continuing our work with the Biden Administration and Congress to improve nutrition security and reduce hunger and diet-related diseases for all Americans.

Sincerely,



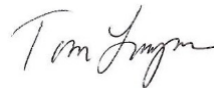
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