

July 15, 2022

RE: Input for White House Conference on Hunger, Nutrition, and Health

To whom it may concern:

The undersigned organizations, members of the Food and Beverage Issue Alliance (FBIA), appreciate the opportunity to provide feedback to the White House regarding its upcoming Conference on Hunger, Nutrition, and Health. FBIA represents more than 40 allied U.S.-based food and beverage trade associations representing various parts of the supply chain from farmers and agricultural processors to packaged goods and retail. Our priorities regarding this conference focus on equity and access, funding, research, public-private partnerships, and innovation. As stakeholders, we are providing the following recommendations for consideration on each of the pillars proposed by the White House for the conference.

Pillar 1: Improve food access and affordability

We support increased equity and access to foods for all Americans. Our organizations, as well as members of our respective organizations, are involved in these efforts through Diversity, Equity, and Inclusion (DEI) initiatives, food donation programs, community partnerships and support of public-private partnerships focused on access. For example, several of the undersigned organizations are active members of the U.S. Department of Agriculture's (USDA) MyPlate National Strategic Partners, and others have worked successfully with USDA on its "Shop Simple" program. We also strongly encourage the establishment of new, innovative public-private partnerships to improve equity and access. Examples of such partnerships could include expanded food donation programs, collaborations between regional/local organizations and food distributors or processors, and connecting healthcare providers with local food banks or food retailers. In addition, a strong and resilient supply chain is essential for improving food access and affordability. We urge the administration to continue its efforts to strengthen the food supply chain through the work of the Supply Chain Disruptions Task Force and initiatives like those being supported by USDA.

We also believe that innovation is a key component in ensuring nutrition security and also increases the diversity and accessibility of recommended foods such as nuts, whole grains, fruits, vegetables, and legumes. From leveraging e-commerce and home delivery technologies to food processing innovation, technological advancements help increase access to safe, affordable, nutritious food. Processed foods can be part of a healthy diet and are under continuous improvement to meet consumer and regulatory demands for nutrition, shelf life, safety, functionality, affordability, and taste, and can also help to address food waste. Further, processed foods often meet consumer demands for convenience at a more affordable rate, and can be sources of critically under-consumed food groups as well as nutrients, such as dietary fiber, potassium, calcium, iron, and vitamin D. Innovations in food formulations can improve the nutritional profile of foods by reducing sodium, fats, or sugar while further improving food safety by enhancing shelf stability and shelf life and reducing potential contaminants and allergens. These benefits are especially important when considering opportunities to increase food accessibility and enhance nutrition in rural and vulnerable communities, such as urban food deserts.

Existing federal nutrition assistance programs like SNAP, WIC, and the USDA Child Nutrition Programs, which includes School Breakfast Program, National School Lunch Program, and Child and Adult Care Food Program, have a long history of successfully satisfying the nutritional needs of underserved individuals. These nutrition assistance programs should be considered for further enhancement and expansion through federal financial support as a means to continue to provide a robust and equitable way for achieving nutritional security.

Pillar 2: Integrate nutrition and health

With regard to integrating nutrition and health, we support science-based, culturally appropriate nutrition education to help ensure all consumers can be better informed about food choices. Additionally, we support education for physicians and other healthcare professionals on food and nutrition and further leveraging dietitians and nutritionists with in-depth nutrition training and experience within the healthcare team to provide more tailored care for patients. With the equity lens in mind, we support federal consumer research to help tailor effective nutrition education for various populations and research related to various aspects of food security and resilience. Funds and investments should be transparent and have measurement metrics and regular reporting on effectiveness, funding allocations, and results. In order to ensure that U.S. dietary guidance is based on the totality of the scientific evidence, we are also supportive of efforts that would provide funding to regularly update the Dietary Reference Intakes (DRIs) and support the process to develop the Dietary Guidelines for Americans. Additionally, the undersigned organizations support consideration for the appointment of a federal position which would oversee the national strategy on consumer-focused nutrition research.

Public-private partnerships are also important in effectively connecting nutrition and health. As previously noted, we are supportive of the establishment and expansion of public-private partnerships, and believe that new partnerships aimed at furthering equitable efforts to connect nutrition and health are critical, particularly for vulnerable communities.

We believe that food processing has always been an avenue for improving the relationship between nutrition and health. Processed foods can offer Americans safe, affordable, desirable, and accessible ways to address nutrient needs, improve dietary patterns and improve overall public health. Further, the government should take this opportunity for specific actions to pave the way for a future regulatory framework that could support personalized nutrition. Currently, our system can only provide population-based dietary information. However, advancement in nutrition research, specifically data from the “all of us” study, could create a path for personalized nutrition, and there needs to be a framework to connect the data with food and food innovation to support personalized nutrition.

Pillar 3: Empower all consumers to make and have access to healthy choices

To effectively achieve the goals of this pillar, we support consumer research to better understand gaps to tailor consumer education programs which address those gaps. We support more robust consumer education efforts and increased funding for nutrition communication. As mentioned above, we believe science-based and culturally appropriate nutrition education will help empower consumers to make healthy choices. Nutrition education and nutrition research funding should each have proper oversight with reporting mechanisms that will support the purpose of the research and understand outcomes achieved. Further, we note that collaboration between the private sector and public entities has been successful previously in driving for expanded food access, and we are supportive of establishing new partnerships or redefining existing ones in ways that would accomplish the goals of this pillar. Additionally, as has been outlined, we continue to support the role that processed foods can play in expanding access to healthy, safe, and affordable food.

Pillar 4: Support physical activity for all

The undersigned organizations support funding for holistic approaches to wellness that consider not only nutrition but other key contributors to health and well-being including physical activity. Similar to

research and funding for nutrition, funds and investments for research and initiatives evaluating physical activity and other drivers of health and well-being should be transparent, include measurement metrics, and have regular reporting on effectiveness, funding allocations, and results. As noted above, we support consideration for the appointment of a federal position to oversee the national strategy on consumer-focused nutritional research, and believe this role could also assess the national strategy on improving physical activity as well as research evaluating nutrition and physical activity.

Pillar 5: Enhance nutrition and food security research

The undersigned organizations support the inclusion of metrics around equity, access, and disparities in nutrition and food security research. We also support efforts to improve current metrics and data collection methods to include evaluation of these parameters. However, we remain concerned and believe there needs to be greater transparency and strategic communications regarding federal program investments surrounding consumer-focused nutritional research, and believe a position overseeing the federal strategy on nutrition research could help alleviate some of these concerns and streamline efficiencies with positive impacts.

We also feel that scientific research findings should stand on their own merits of credibility, robustness, and whether the research was performed in accordance with well-established scientific principles for conducting research. The results and conclusions should not be automatically discounted because some or all the funding for the research came from industry. Similarly, the research and its findings should not be ignored a priori because one or more of the researchers had received industry support at some time in their career.

Additionally, we believe that it is important to strengthen the National Health and Nutrition Examination Survey (NHANES) to study all population groups to address equity, access, and disparity issues, and update nutrient databases, branded databases, and other such databases so that the best data can be utilized to better understand food or nutrient composition patterns and their relationship to health and health outcomes.

In summary, the undersigned organizations support greater public-private partnerships to increase food access and innovation; creation of a federal position on nutrition and physical activity research strategy; increased consumer nutrition education including at the point of healthcare access; and greater funding for the NHANES, DRIs, and Dietary Guidelines for Americans.

As the administration puts together its framework, we recognize that this is just the beginning of the process. We look forward to robust public participation in legislative and regulatory policy changes that may be put forth as ideas in the administration's framework. Thank you for the opportunity to provide feedback, and we welcome further dialogue leading into the September conference and beyond.

Sincerely,
American Bakers Association
American Frozen Food Institute
Calorie Control Council
Can Manufacturers Institute
Consumer Brands Association
Corn Refiners Association
Council for Responsible Nutrition
Global Cold Chain Alliance
Institute of Shortening and Edible Oils

International Dairy Foods Association
International Food Additives Council
Juice Products Association
National Confectioners Association
National Fisheries Institute
National Pasta Association
National Seasoning Manufacturers Association
North American Meat Institute
North American Millers Association
SNAC International
Sugar Association
The Association for Dressings & Sauces
USA Rice