



To Whom It May Concern:

We appreciate the opportunity to provide written comments regarding the White House Conference on Hunger, Nutrition and Health.

The International Dairy Foods Association (IDFA), Washington, D.C., represents the nation's dairy manufacturing and marketing industry, which supports more than 3.3 million jobs that generate \$41.6 billion in direct wages and \$753 billion in overall economic impact. IDFA's diverse membership ranges from multinational organizations to single-plant companies, from dairy companies and cooperatives to food retailers and suppliers. Together, they represent more than 90 percent of the milk, cheese, ice cream, yogurt and cultured products, and dairy ingredients produced and marketed in the United States and sold throughout the world.

IDFA members make some of the most wholesome, nutrition products available in the marketplace. Good nutrition is the foundation of health and wellness for adults and children alike, and dairy is a crucial part of a healthy diet beginning at a very young age. In fact, no other type of food or beverage provides the unique combination of nutrients that dairy contributes to the American diet, including high quality protein, calcium, vitamin D, and potassium, and health benefits including better bone health and lower risk for type 2 diabetes and cardiovascular disease. Moreover, dairy is affordable, comes in a multitude of product and packaging variations, and is widely available to consumers across the United States.

What specific actions should the U.S. Federal government, including the Executive Branch and Congress, take to achieve each pillar? What are the opportunities and barriers to achieving the actions?

The federal government, including the Executive Branch and Congress, should take actions to strengthen and expand existing federal nutrition assistance programs, including SNAP, WIC, and school meals, among others.

SNAP

We know from USDA's Foods Typically Purchased Report, that participants of SNAP prioritize purchases of dairy foods. In fact, among the top 20 items purchased with SNAP benefits, 20% are dairy products. The 2014 Farm Bill created a healthy incentive model at a national scale in the Food Insecurity Nutrition Incentive (FINI), now known as the Gus Schumacher Nutrition Incentive Program, or GusNIP program. What FINI and GusNIP achieved was to improve SNAP by offering SNAP participants incentives to purchase healthier options, such as fruits and vegetables. With the Healthy Fluid Milk Incentive Program (HFMIIP) passed in the 2018 Farm Bill, policymakers took incentives a step further and sought to address the dairy consumption

gap pointed out by the *2020-2025 Dietary Guidelines for Americans (DGAs)*. Yet, neither GusNIP nor HFMIP are sufficiently working at the scale necessary to address malnutrition and disease.

Therefore, we encourage Congress and USDA to build a Healthy Dairy Incentive Program at a national scale in partnership with food retailers, local nutrition organizations, state SNAP agencies, and dairy food makers. We encourage policymakers to expand this program to include healthy dairy foods that SNAP beneficiaries want to purchase, including more varieties of fluid milk, yogurts, and cheeses. It is important to take lessons learned from partnerships such as the Baylor Collaborative on Hunger and Poverty, which has been working with retailers to explore different methodologies of encouraging SNAP participants to increase their purchases and consumption of healthy dairy foods as recommended by the DGAs.

Further, technology must not be a barrier. That's why we encourage policymakers to commit the funding needed to equip each retail outlet offering a SNAP incentive program with Point-of-Sale (POS) software that can provide an immediate benefit incentive or discount to SNAP participants, rather than relying on paper coupons and other forms of redemption that can act as a barrier between participants and healthy options. Additionally, education is critical. State agencies must understand the incentive structure. Retailers must understand how to deliver incentives. Shoppers need to know that incentives exist and how to activate them. And community hunger and nutrition partners must reinforce science-based, positive messages around dairy's role in a healthy diet.

WIC

One of the lessons learned during the pandemic was that flexibility around sensible packaging and variety helped to increase food access. In 2020, 6.3 million Americans participated in the WIC program, according to USDA data, even though many more women and children qualify for the program. Despite best efforts, WIC remains rife with barriers to access, including a limited menu that does not always reflect DGA recommendations nor the latest nutrition research.

At present, WIC participants are not fully redeeming their WIC milk benefits and are consuming fewer essential nutrients as a result. Policymakers could chip away at that gap by reinstating reduced-fat (2%) milk (the most widely available and consumed variety) for all WIC participants, as well as permitting other varieties of milk such as ultrafiltered and organic to simplify and fulfill their allotted redemptions. Further, policymakers need to deemphasize package size in WIC. For example, WIC benefits should be able to be used to buy yogurt in single-serving sizes instead of large, 32-ounce containers which are not widely available particularly in small neighborhood stores.

School Meals

The importance and essential role of nutritious school meals in children's nutritional development and learning ability is well-recognized. Providing school meals to as many students

as possible, through the provision of universal school meals, will encourage increased intake of school meals and the nutrient-rich foods that are part of those meals.

Any changes to the school meal programs should encourage students to select and consume nutrient-rich foods that are recommended by the most recent DGAs. One way is to include a greater variety and availability of milk and dairy options in school meals. For example, when students have access to varieties of milk and dairy products that they consume at home, overall meal consumption increases, waste declines, and children get the nutrients they need to thrive. When dairy products are excluded or restricted, participation and hence consumption of nutritious foods in school meals falls.

Any limits on certain nutrients in the school meal programs should be practical and implementable to permit and encourage the inclusion of nutrient-rich foods. For example, a gradual, reasonable reduction in sodium limits for certain foods like cheese is critical as cheese makers have made great strides in the last decade and have nearly reached the limit of sodium reduction while still ensuring the safety of cheese and its palatability.

Procurement

The USDA food/commodity procurement system as it is currently operating is a major barrier to sourcing available healthy food options from growers and processors, especially smaller and non-traditional entities. Based on feedback from IDFA members, approval eligibility is burdensome; delivery windows are not flexible enough for vendors; product varieties and packaging requirements are too rigid; and fees and expenses are prohibitive. We urge USDA to prioritize developing a streamlined procurement system with fewer burdens on businesses of all sizes and a system that allows for greater flexibility in delivery dates, product SKU and variety, and package size.

What specific actions should local, state, territory and Tribal governments; private companies; nonprofit and community groups; and others take to achieve each pillar?

There are numerous programs based on federal regulations and many of these also include situations where state and Tribal and potentially local governments can affect food access through policy decisions. For example, states and Tribal governments can set the specific foods that are available in the WIC food packages. States or Tribal governments that provide flexibility within the food packages can encourage increased redemption of WIC benefits and increased consumption of nutrient-rich foods and beverages in this program.

For example, flexibility in container sizes, in varieties of fluid milk (2%) and other dairy products (cottage cheese, drinkable yogurt) would permit people to select and consume their preferred dairy product. Flexibility will be important in the federal regulations, but also in the policies and buying lists established by each individual state and Tribal government.

What are opportunities for public- and private-sector partners to work together to achieve each pillar?

There are a number of areas where public-private partnerships have successfully worked toward increasing access to nutrient-rich foods. However, these should be strengthened and expanded to further increase access.

Where SNAP and WIC are not sufficient, food banks fill the gaps. We know from Feeding America®, the nation's largest domestic hunger-relief organization, that milk is one of the items most requested by its network, yet milk is not widely available or is not usually collected due to a lack of cold storage capacity at food banks. This is not a complex problem to solve. We encourage all partners to work together to advocate for greater funding that would allow a significant upgrade in cold storage capacity among our nation's food bank network to house more fresh or perishable foods, such as milk.

While the Farmers to Families Food Box program had challenges, the effort uncovered new methods and networks for distributing food to those most in need. From IDFA's perspective, the food box effort should be applauded for expanding the network of distributors outside of the traditional partners, such as food banks, to include small and grassroots organizations close to communities in need. It is unfortunate that many of those partners are no longer working with USDA or USDA vendors to get fresh, healthy foods to those in need. Moreover, the food box program improved on other longstanding programs, such as the Commodity Supplemental Food Program (CSFP) and the Emergency Food Assistance Program (TEFAP). On the former, the food box program used refrigerated transportation to bring healthy and fresh foods to low-income seniors when they had been accustomed to receiving dried, canned, and boxed foods. The food box program also expanded the types and varieties of food that could be provided through programs like TEFAP, which prompted TEFAP partners to speak on behalf of their customer base by demanding more fresh, healthy food options in the food packages. For CSFP and TEFAP, the food box effort expanded program access in rural, tribal, and other currently underserved areas in a way that traditional programs still have not.

In addition to these existing programs, we strongly encourage establishment of new 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.

What are innovative, successful activities already happening at the local, state, territory and Tribal levels that could inform actions at the Federal level?

One of the policies and programs that has worked well to increase access to nutritious foods is incentive programs under SNAP.

As mentioned previously, the 2014 Farm Bill created a healthy incentive model at national scale in the Food Insecurity Nutrition Incentive, now known as the Gus Schumacher Nutrition Incentive Program, or GusNIP program. What FINI and GusNIP did was improve SNAP by offering SNAP participants incentives to purchase healthier options, such as fruits and vegetables. With the Healthy Fluid Milk Incentive Program passed in the 2018 Farm Bill, policymakers took incentives a step further and sought to address the dairy consumption gap

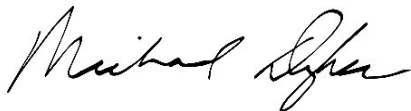
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Conclusion

We support the Conference's goals of eliminating hunger and increasing healthy eating and physical activity by 2030. In order to help reach the goal of increased healthy eating, IDFA also supports federal funding that is sufficient and consistent with encouraging adequate consumption of nutrient-rich foods, including three servings of dairy each day for most Americans. There are a number of actions that the federal government could take to help meet these goals, including strengthening and expanding existing federal nutrition assistance programs, streamlining procedures for federal procurement programs, building additional public-private partnerships for food donations and implementing a national Healthy Dairy Incentive Program under SNAP.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Dykes". The signature is fluid and cursive, written in a professional style.

Michael Dykes, DVM
President and CEO