



July 14, 2022

To: White House Conference on Hunger, Nutrition, and Health
WHHungerHealth@hhs.gov

From: American Frozen Food Institute

The American Frozen Food Institute (AFFI) appreciates the opportunity to provide input and ideas to the White House in advance of the September Conference on Hunger, Nutrition, and Health. From manufacturers and distributors, and suppliers and packagers, AFFI is proud to represent publicly traded and family-owned companies that help produce frozen foods and beverages for today's foodservice and retail marketplace and serve as economic pillars within their communities. AFFI members share a commitment to transparently communicate information about the nutritional content and ingredients in the foods they produce and sell and to improve access to nutritious foods that support reducing food insecurity and promoting disease prevention and health.

As the conference's panel of advisors develop a policy strategy to end hunger and diet-related diseases in the United States, AFFI recommends that the final strategy reflect the below considerations to ensure a successful approach to advancing nutrition equity.

Any national strategy to address hunger and promote nutrition equity should include pragmatic, feasible solutions that meet the needs of consumers.

State, local, and federal feeding programs should not undermine the dignity of low-income Americans who do not live near local agricultural production, cannot access certain foods off-season, do not have the means to travel to special marketplaces, or do not have the time or cooking skills to prepare certain foods. Any strategies to address hunger should also recognize that food processing plays a vital role in ensuring access to food that is safe, nutritious, accessible across the country, reduces waste, and allows for consumer choice. Pragmatic solutions that support a variety of food options, regardless of processing or temperature state, will support nutrition equity and help the populations lacking readily available access to nutritious food, including certain rural and vulnerable communities.

As such, feeding programs such as the Supplemental Nutrition Assistance Program (SNAP) must be practical and meet the needs of the families who rely on this assistance. A recent USDA study identified barriers faced by SNAP participants that prevent them from having access to a nutritious diet. While the most common barrier was the affordability of food, additional identified barriers included a lack of cooking skills and lack of time to prepare foods¹. At the same time, consumers

¹ *Barriers that Constrain the Adequacy of Supplemental Nutrition Assistance Program (SNAP) Allotments*. 2021. Available at: <https://fns-prod.azureedge.us/sites/default/files/resource-files/SNAP-Barriers-Summary.pdf>

consistently point to affordability, quick and easy preparation, ease of storage and reduced waste as key reasons to purchase and consume frozen foods².

Frozen foods play an important role in addressing these barriers to nutrition and ultimately support public health. Easy to follow on-packaging instructions help consumers prepare meals with minimum equipment, cooking skills or time, and satisfy diverse preferences and align with their cultural norms. Further, frozen produce is peeled and chopped in advance, which provides additional convenience to consumers and removes one more barrier to healthy eating. At the same time, pre-packaged servings allow for portion control, an important factor in helping consumers meet caloric goals.

To help consumers more easily meet recommendations from the U.S. Dietary Guidelines on fruit and vegetable intake, any federal feeding programs intended to increase produce consumption should promote all forms of produce.

Frozen fruits and vegetables are an excellent complement to the fresh produce market. Both forms, regardless of temperature state, are important for consumer nutrition. The U.S. Dietary Guidelines recommends consumers eat all forms of fruits and vegetables in order to meet the recommended number of servings. In addition, the U.S. Department of Agriculture's (USDA) Thrifty Food Plan recognizes the value of frozen food in helping consumers eat a diet that meets federal nutrition guidance and eases preparation among those for whom this is a barrier.

Frozen food helps facilitate increased access to produce consumption. Research shows that the nutritional value of frozen fruits and vegetables is equal to, and in some cases better than, fresh produce^{3,4}. In addition, when consumers have various forms of fruits and vegetables available in their home, their produce intake is higher than if just fresh is available⁵. Both categories of produce are important and valuable to improving food access and nutrition.

Any recommendations to fight hunger should be consistent with and otherwise promote a sustainable food system, especially one that minimizes food waste.

Frozen foods are critical to fighting food waste due to their extended shelf-life and pre-portioned servings that help consumers prepare just the amount of food they plan to eat. This translates to consumers saving money and added benefits to the environment due to reduced GHG emissions in landfills from food waste.

² Power of Frozen. 2021. American Frozen Food Institute. Available at: <https://affi.org/insights/power-of-frozen-resources>

³ Bouzari, A., D. Holstege and D.M. Barrett. 2015. Vitamin Retention in Eight Fruits and Vegetables: A Comparison of Refrigerated and Frozen Storage. *Journal of Agricultural and Food Chemistry*, 63(3):957-962

⁴ Li, L. et al., 2017. Selected analyses of fresh, fresh-stored, and frozen fruits and vegetables. *Journal of Food Composition and Analysis*, 59:8-17

⁵ Produce for Better Health, www.fruitsandveggies.org

Families throw out up to \$2,275 worth of food each year⁶. With the increased inclusion of frozen foods, families can reduce this financial waste due to the longer shelf-life and being able to prepare only what is needed.

Purchasing, expanding, or upgrading cold storage infrastructure (i.e., freezers) at food banks and small retailers (e.g., convenient stores) will ensure the ability to provide more quality, healthy frozen food without the concern about spoilage or waste. Diminished waste, thanks to frozen food, can also help lessen the environmental impact of the entire food production chain, and decrease waste that occurs during distribution and at retail.

To allow food insecure families to take advantage of the benefits of frozen foods in federal feeding programs, several current programs must be modified. Current federal feeding programs discriminate between foods based on temperature state and reduce the opportunity for frozen food to contribute to the advancement of nutrition equity.

To help consumers choose foods that meet their family's needs and overcome barriers to healthy eating, nutrition incentive programs should include frozen foods. In fact, an AFFI member recently [provided testimony](#) in front of a House Agriculture Committee hearing on non-SNAP feeding programs, and stressed that programs can be modified to better include frozen food as an option for consumers. For example, WIC statutory language should be modified to mandate that frozen produce be included in state programs. Today, that language lists frozen as optional and can reduce consumer choice and access to frozen food.

Other examples of current programs that require modification to further include frozen foods are:

- The Fresh Fruit and Vegetable Snack Program: This school program should include plain frozen produce. The intent of the program (to increase overall produce intake) is positive. The positioning of fresh as superior to frozen is misguided since frozen produce is as nutritious as fresh produce. Any expansion to the program should require that school operators have flexibility to choose frozen in addition to fresh produce.
- The Gus Schumacher Nutrition Incentive Program (GusNIP): GusNIP should only support incentive programs that seek to increase all forms of produce consumption so that consumers have the flexibility to enjoy more produce in ways that make the most sense for their families and unique circumstances.
- Produce Prescription Programs: These programs should include all forms of produce so that consumers have the flexibility to increase produce consumption in ways that makes the most sense for their needs.
- Emergency Food Boxes: Initiatives such as USDA's Farmers to Families Food Box Program, which was launched during the COVID-19 pandemic, should permit frozen foods, recognizing that there are cold chain distributors/logistics providers that can manage such boxes.

⁶ <https://www.nrdc.org/media/2012/120821>

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We thank you for the opportunity to provide this input and appreciate the efforts to address hunger and health in the United States. Frozen food is an important tool in helping ensure access to food and nutrition needs, is a complement to the fresh produce market, and should be part of pragmatic solutions to meet the needs of those most likely to experience hunger.

Sincerely,

A handwritten signature in cursive script that reads "Alison Bodor".

Alison Bodor
American Frozen Food Institute
President and CEO