



CONSUMER  
BRANDS  
ASSOCIATION

**Tackling Hunger and Food Insecurity in America**  
**Our Perspective on the Challenge Facing Our Country and Essential**  
**Policies to Address It**

**Comments from the Consumer Brands Association**

Submitted in reply to the White House Conference on Hunger,  
Nutrition and Health

Far too many Americans confront hunger or struggle with food insecurity. This critical challenge must be solved – and we believe America’s leading food providers will play a vital role in helping to solve it. Doing so will require effective public policies, strong collaboration and close coordination across stakeholders, as well as a steadfast commitment to public-private sector partnership. Only with government, non-governmental organizations and private sector leaders working together can we hope to improve nutrition and eliminate hunger and food insecurity in America.

Consumer Brands Association champions the industry whose products Americans depend on every day, representing more than 2,000 iconic brands. From cleaning and personal care to food and beverage products, the consumer packaged goods industry plays a vital role in powering the U.S. economy, contributing \$2 trillion to U.S. GDP and supporting more than 20 million American jobs.

Consumer Brands member companies are deeply committed to delivering the food, nutrition and household goods vital to everyday life. We are also committed to advancing a more equitable food system in the U.S. We believe no one should go hungry and all should enjoy access to a variety of affordable, accessible and available nutritious food. Our industry’s dedication to meeting this mission has been evident throughout COVID-19 as critical household needs triggered massive consumer demand. Our member companies transformed their operations, working around the clock to keep plants running and critical products moving.

Every day, our industry works with partners at local, state and national levels to address food insecurity. Our companies collaborate with stakeholders to make nutritious food more accessible; donate food and invest resources in organizations fighting to end hunger; promote nutrition and healthy lifestyle education, urban agriculture and farm-to-fork programs; and make products that provide good nutrition at affordable prices. The CPG industry is deeply committed to philanthropic causes, contributing more than [\\$1.9 billion annually](#) in charitable giving, according to IRS reports.

We strongly support President Biden’s decision to convene for the first time in over half a century a [White House Conference on Hunger, Nutrition and Health](#). Our industry is pleased to participate in the Conference and shares the Conference’s aim of prioritizing food security, empowering consumers to make informed choices supporting their nutrition and health and ending hunger in the United States by 2030. And we commend the important work being done by dozens of organizations to lower food insecurity and to improve our nation’s nutrition and health.

Today, more than 38 million American households suffer from food insecurity – uncertain of having or being unable to acquire enough food and nutrition to meet their household’s needs.<sup>i</sup> According to the [U.S. Department of Agriculture](#) (USDA), this includes 15 percent of households with children younger than age six.<sup>ii</sup> In the Washington, DC metropolitan region where Consumer Brands Association is headquartered, fully [one-in-three residents](#) experienced food insecurity at some point in 2021.<sup>iii</sup> Across the country, single-parent families and households of color are disproportionately impacted by food insecurity.<sup>iv</sup>

We know the challenge facing our society is too big for any single entity to address on its own. We look forward to continuing to partner with government officials, non-governmental leaders, advocacy organizations, policy experts and private sector partners to find solutions to hunger and food insecurity in America.

## Policy Principles

We believe any policy solutions resulting from the White House Conference must adhere to three principles:

1. **Accessibility:** Americans must have diverse choices to readily obtain nutritious food essential to help build healthy dietary patterns.
2. **Availability:** Americans must have a consistent supply of vital food and products that can be acquired whenever needed.
3. **Affordability:** Americans must be able to afford what they need to help build healthy dietary patterns and meet essential daily needs.

## Policy Goals

Our participation in the White House Conference will be informed by the principles above and seek to achieve the following policy goals:

1. **Modernize and revitalize the FDA's food and nutrition mission.** The Food and Drug Administration (FDA) needs to unify the structure for its food and nutrition program under a new, fully empowered Deputy Commissioner who is accountable to the Commissioner. A new structure overseen by this new position that is fully responsible and accountable for the program will improve regulatory oversight and assure timely finalization of remaining Food Safety Modernization Act rules and guidance. It will also accelerate the implementation of the [New Era of Smarter Food Safety](#) blueprint to modernize regulatory frameworks and processes. The FDA should also establish a structured and prioritized regulatory agenda for its food and nutrition program, using a transparent process to seek stakeholder input, conduct public rulemaking and issue guidance. Finally, we believe the FDA should define pathways to bring new products to market, including nutritious products, through modernized standards of identity and clear regulatory processes to accelerate innovation. We believe this can be done efficiently and more transparently without compromising the FDA's food safety mission or public health. American companies are ready to respond and partner with the FDA to bring foods to market that meet the essential, daily needs of American families.
2. **Invest in strong, resilient food supply chains.** Events throughout COVID-19 underscored how every link in the supply chain must be strong to ensure food security. Supply chain delays and disruptions limit availability and make food less affordable, disproportionately impacting lower-income families. Our industry has invested billions of dollars in efficient, modern supply chains; consistent delivery of the foods we provide helps make good nutrition more affordable and available to more people. It is time for the federal government to lead a more coordinated and strategic approach to supply chain policy. This includes creating a Critical Supply Chain Resiliency Program to provide the expertise and interagency support required to ensure affordable essentials are always available for all Americans. Government policies should focus on taking time, cost and

complexity out of supply chains, like increasing truck-weight limits, establishing a “ground traffic control” for freight transportation and improving rail and ocean shipping performance. The federal government should also seek to create a stronger partnership between the public and private sectors to enable a deeper understanding of the capabilities and constraints facing each.

- 3. Empower consumers by putting transparency at the center of food purchasing decisions.** Providing transparent, understandable information about product ingredients and nutrients can educate consumers, empowering them to make choices to meet their individual dietary needs. Since 2015, our industry’s digital [SmartLabel](#) solution has delivered on-demand information to consumers before, as they shop and after purchase, so they can know more about the products they use and consume every day. Our industry is committed to further integrating nutrition and health by providing even greater transparency, including front-of-pack labeling that summarizes key nutrition information presented in a consistent, easy-to-understand, consumer-friendly format. Voluntary front-of-pack labeling initiatives, including [Facts Up Front](#), deliver at-a-glance fact-based product information allowing consumers to make more informed choices when it comes to several key nutrients aligned to the Dietary Guidelines for Americans. Legislative and regulatory proposals should ensure uniformity and allow for the use of innovative tools to make it easier for manufacturers to provide unbiased, comprehensive, positive, up-to-date information to consumers on-demand and at their fingertips.
- 4. Promote greater accessibility and availability through e-commerce solutions.** Overcoming long-standing barriers to food security requires fresh thinking, creative policy solutions, and new business models and approaches. E-commerce can play an important role in this effort. During the pandemic, e-commerce-driven food delivery became a major force within America’s food economy. According to a [new study](#) by Brookings Institution experts, “this new component of the food system offers great promise to address food insecurity at the scale America needs.”<sup>v</sup> The vast majority of Americans currently live in areas where there are multiple options for delivery of food through digital services. We support assessing programs such as the USDA’s [Supplemental Nutrition Assistance Program \(SNAP\) pilot program](#), which enabled participants to select and pay for groceries online, and the new broadband [Affordable Connectivity Program](#), to determine their potential for enabling a new model of food assistance and support. Online food ordering and delivery, paired with appropriate policy support could help overcome obstacles to food access, affordability and availability. The advent of digital platforms – and their potential ability to help overcome barriers to food security – also underscores the importance of modernizing food labeling policies. Doing so can help to ensure consumers can access important information when making purchasing decisions at the point-of-sale on digital platforms.

Other barriers to accessibility exist in the marketplace, beyond e-commerce platforms. Some nutrition programs administered by the federal government deem canned, frozen and dried fruits and vegetables ineligible, even though they have been shown to be equally nutritious. Correcting this would provide another important avenue by which American families could have access to nutritious food sources.

The goals above align to three of the [White House Conference pillars](#): 1) Improve food access and affordability; 2) Integrate nutrition and health; 3) Empower all consumers to make and have access to healthy choices.<sup>vi</sup> By achieving our recommended goals, policy solutions can help

make meaningful progress toward eliminating hunger and strengthening food security in America.

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<sup>i</sup> “Food Security in the U.S.: Key Statistics and Graphics,” U.S. Department of Agriculture Economic Research Service. <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-u-s/key-statistics-graphics/#householdtype> Accessed June 15, 2022

<sup>ii</sup> “Food Security in the U.S.: Key Statistics and Graphics,” U.S. Department of Agriculture Economic Research Service. <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-u-s/key-statistics-graphics/#householdtype> Accessed June 15, 2022

<sup>iii</sup> “33% of DC-area residents experience food insecurity,” WTOP News, June 18, 2022. <https://wtop.com/local/2022/06/33-of-d-c-area-residents-experience-food-insecurity/>

<sup>iv</sup> “Food Security in the U.S.: Key Statistics and Graphics,” U.S. Department of Agriculture Economic Research Service. <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-u-s/key-statistics-graphics/#householdtype> Accessed June 15, 2022

<sup>v</sup> “Delivering to deserts: New data reveals the geography of digital access to food in the U.S.,” George and Tomer, Brookings Institution, May 11, 2022. <https://www.brookings.edu/essay/delivering-to-deserts-new-data-reveals-the-geography-of-digital-access-to-food-in-the-us/>

<sup>vi</sup> Conference Pillars, White House Conference on Hunger, Nutrition, and Health. <https://health.gov/our-work/nutrition-physical-activity/white-house-conference-hunger-nutrition-and-health/conference-details>