



CSPI's 2024 ACTION PLAN & MENU OF CAMPAIGNS

The Center for Science in the Public Interest is pursuing exciting food and health campaigns nationwide and partnering with communities seeking novel solutions to pressing policy concerns.

Deceptive marketing practices. Dubious health claims. Harmful additives. Punitive and bureaucratic nutrition assistance programs. Pathogens in your meat and greens. Restaurant meals excessively high in sodium and sugar. Under-regulated dietary supplements and lab tests.

These are the concerns that CSPI staff and our partners across the country are tackling – and winning!

CSPI championed recent wins such as a **ban on Red 3** artificial food dye in California, **excessive sugar warning labels** for restaurant items high in added sugar in New York and **healthy default kids' menus** at restaurants in the largest counties in Maryland. CSPI secured corporate commitments to increase **folic acid fortification in corn masa products** and to reduce **sugar in flavored milks** provided to schools nationwide. CSPI is taking legal action against makers of deceptive lab tests and driving public comment to new Food and Drug Administration (FDA) rules that would **regulate medical devices used for "precision nutrition."**

CSPI is **reaching a wider audience** after creating a platform to share our award-winning NutritionAction newsletter online and disseminating content increasingly through social media.

And – true to our name – we continue to ground our campaigns in **independent, peer-reviewed scientific research.**

CSPI accepts no corporate funding. Instead, we rely on contributions from individuals and foundations to propel our campaigns and shape our food systems in ways that put people and the environment first.

General support is the very most valuable form of contribution, as it allows CSPI to be most nimble and responsive to consumer concerns about nutrition, food safety, and health. Alternatively, CSPI invites you to invest in one or more of the following ambitious campaigns for which we are actively seeking funds.

PROMOTING HEALTHY FOOD IN OUR COMMUNITIES

Reducing Excess Sugar and Sodium

CSPI's petitions call for bold action to bring both added sugars and sodium intake to levels recommended by the Dietary Guidelines for Americans, in 10 years.

Overconsumption of foods or beverages high in added sugars is linked to weight gain, type 2 diabetes, heart disease, and tooth decay.

Together with the New York City Department of Health and Mental Hygiene, CSPI is calling on the FDA to set voluntary targets for reducing added sugars in foods and beverages. We filed a [regulatory petition jointly with the agency](#).

The FDA already has a similar program setting short-term, [voluntary targets for sodium reduction](#) in various categories of processed, packaged, and prepared foods, inspired in large part by multiple [petitions](#) and [lawsuits](#) from CSPI. Now we're pushing FDA to put longer-term limits in place and fully evaluate the impact of the program.

Labeling Initiatives

Improving transparency for consumers to know the truth about what is in foods and beverages sold in stores, online, and in restaurants.

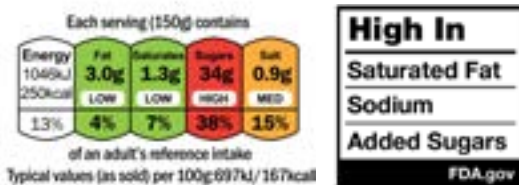
More and more communities are speaking out about grocery store shelves and restaurant menus dominated by calorie-dense, nutrient-poor foods that are engineered to tempt our tastebuds and packaged to appear healthier and more wholesome than they really are. Food labeling is a valuable public health tool for conveying information to consumers that enables them to make safer, healthier, and more informed food choices. It also puts pressure on industry to reformulate.



Senator Cory Booker (D-NJ)

“Our grocery stores are flooded with ultra-processed foods which are nutrient-poor and high in added sugars and salt. We know that these foods are making Americans chronically ill at a massive scale – diet-related illnesses are the number one leading cause of death and disability in America. For too long, many in the food industry have prioritized profits over people’s health, which is why I have called for the FDA to implement reductions in salt and sugar in processed foods. The FDA has already made strides on voluntary sodium reduction targets; now it’s time we do the same for added sugars. I urge the FDA to heed the recommendations of Center for Science in the Public Interest and the New York City Department of Health and Mental Hygiene to address this urgent public health issue.”

For more than 50 years, CSPI has led national efforts to transform the food labeling landscape and help consumers see the truth behind the packaging. Our victories improving the transparency and accountability of food companies include health warnings on alcohol, the mandatory “Nutrition Facts” panel, rules requiring the disclosure of allergens, calorie counts on chain restaurant menus, and lawsuits challenging misleading claims on products from companies like PepsiCo, Kellogg, and General Mills.



Despite overwhelming bipartisan support, the U.S. lags behind dozens of countries that have adopted Front-of-Pack nutrient warning labels (like Chile, Mexico, Canada, and Israel) or traffic light labels (like Ecuador and Iran).

Despite these many successes, our food labeling work is far from finished. The industry continues to push back against common-sense labeling policies like requiring calories on alcoholic beverages. Marketing practices, consumer habits, and the underlying science are continually changing, necessitating updated laws and regulations, like labeling for food sold online and simplified nutrition information on the front of food packages.

CSPI is directing resources towards campaigns with the greatest potential public health impact.



CSPI is working with advocates to place sodium and/or added sugar warnings on restaurant menus in New York City, New York State, Cleveland, and Massachusetts.

Keeping Children Healthy

CSPI is defending against not only cuts in funding for the National School Lunch and Breakfast programs – but also against threats to hard-fought nutrition standards.

The dairy industry, for example, is arguing for an exemption from a 2023 U.S. Department of Agriculture recommendation for gradual sodium reductions for food served in schools.

We are working with states to codify federal nutrition standards. California recently became the first to do so after CSPI submitted supportive testimony. With researchers at Harvard and Tufts, we are analyzing the [health and economic impacts of school meal standards](#) consistent with the 2020-2025 Dietary Guidelines for Americans. We released a report on how [competitive foods in schools rank](#) on their use of added sugars and synthetic dyes. “Competitive foods” are items sold in school cafeteria à la carte lines, vending machines, and elsewhere on school grounds. We found that many items would already be compliant with standards CSPI is advocating. And we spoke out about the unintended consequences of opening school meals program to ultra-processed products like Lunchables.

CSPI is seeking local financial partners interested in bringing warning label campaigns to additional cities, counties, and states – and national funding partners to build support for Front-of-Pack warning labels nationwide and to strengthen school food standards that would lower sugar and sodium.

REIMAGINING THE POWER OF NutritionAction

Reaching and mobilizing new audiences in a digital age

CSPI's subscription-based NutritionAction health newsletter helps hundreds of thousands of readers navigate the complexities of our food system and make informed choices about their health.

Free from advertising in every issue, CSPI's nutrition scientists provide reliable analysis of the research on diet and health, objectively review brand-name products, and independently rank foods.

The power of this publication goes further than mere education – it is also where science and journalism meet advocacy. A recurrent focus is on ads and marketing that mislead consumers. NutritionAction investigations at times spur CSPI's advocacy campaigns to protect consumers and our advocacy work often leads to NutritionAction articles.

For the last 50 years, CSPI has relied on funding from NutritionAction print subscribers contributing small donations. This strong base of support from individual donors has kept us accountable to the public, lent valuable unrestricted support, fostered versatile campaigns responsive to consumer needs, allowed us to retain expert staff, and provided financial stability for the organization – all while allowing us to remain free of corporate influence. However, like others in the magazine industry, CSPI has seen a steady decline in circulation.

CSPI has updated its business plan to reach new audiences. While we remain loyal to our print subscribers, we are investing in a digital communications team to share NutritionAction online. Our digital team is broadening our base of advocates and financial supporters through social and paid media. In sharing NutritionAction content online, we invite new audiences to an enhanced website, drive public comments on pressing food and health regulatory petitions; and provide a platform to speak directly to industry executives.

Budget: CSPI is seeking \$150,000 to accelerate our development of online news and videos and to amplify direct action to influence food companies.



Engage with our science writers like Caitlin Dow through videos on Facebook, Instagram and Twitter.

ACTION ON ADDITIVES

Upgrading Chemical Cuisine

The public's single most authoritative source for information about the safety of food additives is CSPI's popular Chemical Cuisine ratings database.

Consumers come to the website to learn about the safety of what has been put in their food to color it, to increase its shelf life, to replace its fat or sugar, or to heighten its flavors. We plan to upgrade our database to make it more accessible, sortable, and searchable.



Accordingly, CSPI plans to update our current database so users are confident that the additives ratings integrate the latest evidence available. In doing so, we expect to identify additional priority substances for activism and launch campaigns to influence agency officials and pressure companies to remove these chemicals from their products. We aim to increase consumer familiarity with food additive safety, engaging new audiences through social media to take action with us on targeted harmful additives.

Removing Red 3

Most people would be quite surprised to learn that a known carcinogen is banned for use in lipstick but is still widely used in thousands of foods, including baked goods, candies, and drinks marketed to children.

CSPI is leading a campaign to eliminate the use of the most harmful artificial food dyes. Last year we [petitioned the FDA](#) to eliminate Red 3 from the food supply. The FDA has long known that Red 3 is a carcinogen. In 1990, the agency banned Red 3 from cosmetics and said it would “take steps” to ban the use of Red 3 in foods, ingested drugs, and dietary supplements.

Inaction by the FDA prompted CSPI to join with others to win a ban on the use of Red 3 in packaged foods sold in California. It is a significant win – the first in the country – and we hope it will inspire state and federal public health leaders to follow suit!

Other chemicals high on CSPI's priority list include titanium dioxide, a color additive that damages DNA; the artificial sweetener aspartame (characterized as a possible carcinogen by the World Health Organization (WHO)); and nitrates/nitrites, which are chemicals used in cured and processed meats (classified as probable carcinogens by the WHO).

Budget: CSPI is seeking \$150,000 to update and increase the reach of Chemical Cuisine. Help us reduce the prevalence of Red 3 and other priority chemicals. Funding of \$250,000 will accelerate our campaign to build support for national action.

FOOD AND ENVIRONMENT CAMPAIGNS



According to the United Nations, about a third of all human-caused greenhouse gas emissions can be linked to food systems.

CSPI is bringing its expertise to bear on sectors that could re-shape the eating habits and behaviors of young people growing up in a climate crisis.

CSPI plans to add environmental sustainability to its successful state and local campaigns to improve the nutritional quality of kids' meals. We are drafting model legislation and building support for a policy that would require restaurants to serve one plant-based kids' meal combination that also meets nutrition standards.

We are exploring a similar approach in National School Lunch Program (NSLP). With an annual budget of \$14 billion to serve 40% of children in the U.S., the scale, reach, and purchasing power of NSLP represents a significant yet untapped opportunity to address climate change. Even small changes to the food and beverage items served at school lunch, such as plant-based options, can lead to meaningful reductions in emissions and other environmental impacts, while also educating young consumers about the benefits of this approach. Changes to reduce food waste and packaging in school meals can complement this effort.

\$150,000 will help us lead a generational and structural shift and elevate these common-sense policy solutions that are a win-win for people and the planet.

LEVERAGING PUBLIC DOLLARS TO PROMOTE HEALTH AND THE ENVIRONMENT

The federal government spends \$9 billion on foods and beverages each year. States and localities spend still more. But the impact on dietary health and the environment is not customarily a required procurement consideration.

CSPI is partnering with allies to make policy changes that will pressure suppliers to change their purchasing practices. At the state and local level, we're already seeing progress.

And at public universities, we are working with college students to end or amend exclusive pouring rights contracts with PepsiCo and Coca Cola. Our published research shows that contracts with soda companies often provide universities with financial incentives to increase sugary drink consumption.

Finally, CSPI is working with advocates for incarcerated people to stop the privatization of food services at correctional facilities. Healthy food is a human right. Many reports indicate that outsourcing food services to the lowest bidder has driven down the nutritional quality of foods and beverages, creating an unjust health burden.

PROMOTING SCIENTIFIC INTEGRITY

CSPI is one of the nation's leading health misinformation watchdogs.

For decades, political agendas, anti-science forces, and profit-driven industry influence have undermined independent science and efforts to reduce preventable disease. We saw open hostility to scientific expertise during the COVID-19 pandemic which further eroded public confidence in government and science at the cost of thousands of lives.

CSPI works to re-center science in the public health policymaking process. Evidence-based science informs everything CSPI does. We accept no corporate grants – nor do we accept advertising in *NutritionAction*. CSPI's senior scientists are regularly called on to testify before Congress and government agencies, including on misinformation during the COVID-19 era related to ivermectin, hydroxychloroquine, and dietary supplements. Influential scientific journals such as the *Journal of the American Medical Association (JAMA)* and the *British Medical Journal (BMJ)* publish articles by CSPI's experts. Journalists depend on CSPI's trusted, independent work to explain the latest findings and weigh in on decisions on nutrition, food safety, and many other health care issues.

We're calling on FDA to better regulate [laboratory-developed diagnostic tests](#) and the emerging field of "precision nutrition," where marketing claims for medical devices, food, and supplements have outpaced the science. In an ever-increasing climate of misinformation, we must insist that government policies are transparent and consistent with scientific evidence on health and nutrition.

Strengthening Regulation of New Food Technologies

CSPI advocates for strong, science-based government regulation and responsible corporate practices in the development and proliferation of new food technologies, including cell-cultured meat and genetically-edited and engineered plants and animals that are released into the environment or that end up in our foods.

We act as a watchdog, educate key stakeholders, and seek transparent, evidence-based regulations that put consumer safety first. New technologies should be reviewed scientifically on a case-by-case basis. Many see CSPI as honest brokers between adversarial parties in this space.

CSPI has recently led several other organizations in advocating for more robust regulation of animals engineered to have desirable traits like being resistant to diseases. We advocated for science-based regulation of these products before Congress and the Executive Branch, as well as in op-eds in mainstream publications.

We are working with this coalition to also advance understanding of genome editing applications for food, agriculture, and environmental sustainability. And we are identifying areas in need of further advocacy and/or science education efforts, commissioning white papers on genome editing precision and risks; applications of genome editing for climate adaptation; and equity considerations for gene editing in agriculture and the environment.

CSPI is seeking funds of \$130,000 for expert staff to monitor and report on new food technologies.

USING LITIGATION IN THE SERVICE OF TRANSPARENCY AND PUBLIC HEALTH

Consumers deserve good lawyers to fight Big Food and put their interests front and center.

CSPI's legal team pioneered the use of private litigation to correct unfair and deceptive marketing practices and to fill the void between federal regulations and enforcement.

In groundbreaking legal action, CSPI spurred Kellogg to adopt the first enforceable nutrition standards for marketing cereals and other foods to children. And CSPI's threat of litigation led the soda industry to pull full-calorie sodas from schools nationwide.

We pursue litigation where industry and regulators are failing us. Food and supplement manufacturers, for example, often make misleading claims on the front of their packages but, when challenged, argue that deceived consumers should have read the fine print. CSPI believes consumer protection laws should protect ordinary consumers, the kind that move quickly through grocery stores and don't have time to parse labels with a microscope. That's why we've fought and successfully got courts to recognize that consumers are not expected to look beyond prominent, misleading representations to discover the truth from the fine print.

When we learned that a federal district court had recently chipped away at this important principle, in a case involving allegedly misleading whole grain claims on Back to Nature Organic Stoneground Wheat Crackers, CSPI's litigators joined the fight. We're currently appealing that district court ruling and attempting to achieve another landmark decision for consumers.

In another case, CSPI filed a lawsuit against EpicGenetics, the maker of a laboratory-developed test (LDT) for fibromyalgia, for false and misleading claims. According to the Complaint, EpicGenetics falsely claims its FM/a Test for fibromyalgia is "99 percent accurate" when the company's own study indicates the test generates 30 percent false positivity rate among some patients (that is, for some patients, the test inaccurately diagnoses fibromyalgia when it is not present). CSPI is seeking to enjoin EpicGenetics from its unlawful trade practices and to ensure that future patients will receive truthful information about the tests' (in)accuracy.

The lawsuit also draws attention to the lack of oversight over LDTs, such as the FM/a Test. The FDA has historically not exercised its authority to regulate LDTs, leading to the proliferation of inaccurate diagnostic tests that have caused significant harm to patients. CSPI has called on Congress and FDA to strengthen the regulation of LDTs.

In another example, CSPI petitioned the Treasury Department's Alcohol and Tobacco Tax and Trade Bureau (TTB) to mandate an "Alcohol Facts" panel on alcoholic beverages similar to the ubiquitous "Nutrition Facts" panel on foods. After years of inactivity on the petition, CSPI and two of our coalition partners sued TTB to force the agency to respond to our requests. In response to our "delay" lawsuit, TTB agreed to initiate rulemaking on mandatory alcohol content, nutrition, and allergen labeling on alcoholic beverages. TTB

also agreed to begin preliminary rulemaking on mandatory ingredient labeling. Our litigators and advocates will continue to fight until these critical labeling changes are implemented.

Serving Facts		
Serve Size	12 fl oz (355 mL)	
Alcohol by Volume	5%	
Contains	Amount per Serving	
	Amount per Serving	Amount per Container
2	Calories 150	300
Drinks	1 oz of alcohol	1.25

CSPI's latest recommended mandatory label would provide critical information needed to avoid the harms of excess alcohol — and concomitant calorie — consumption.

CSPI seeks changes in industry practices, and focuses on getting more accurate and helpful information for consumers. Contributions of \$50,000 support our modest costs and expert legal staff to take on future cases against other major purveyors of harmful, unhealthy, or misleading foods and dietary supplements.

MAKING OUR FOOD SUPPLY SAFER

Food industry officials often claim that the U.S. has the “safest food in the world.” The truth is, our food is nowhere near as safe as it should be.

Regulators and the food industry have not done enough to mitigate deadly pathogens like toxin-producing *E. coli* and *Salmonella*, leaving consumers vulnerable to food poisoning risks. As a result, we continue to be sickened and die at unacceptably high rates due to contaminated foods.

CSPI’s team of scientists and lawyers seek out regulatory opportunities to help remove from store shelves unsafe meat as well as produce, like romaine lettuce, cantaloupe, and sprouts that account for an increasing fraction of food-poisoning cases. CSPI staff made the case for stronger regulatory oversight of our food supply in the Netflix documentary [POISONED: The Dirty Truth about Your Food](#), which shines a harsh light on the American food system.

CSPI is championing the Expanded Food Safety Investigation Act (EFSIA), a bill that would allow federal officials to investigate foodborne outbreaks that emerge from large animal farms. We are urging the FDA to declare the most aggressive strains of *Salmonella* as adulterants in raw poultry, thereby removing the most highly contaminated products from the marketplace. In the 1990s, consumer outrage translated to effective change when the USDA moved to ban dangerous *E. coli* from ground beef, resulting in dramatic declines in illnesses from beef.

CSPI is seeking \$160,000 to cover a campaign manager with expertise in veterinary medicine, infectious disease, public health, and regulatory oversight.