



May 20<sup>th</sup>, 2024

The Honorable Glenn Thompson  
Chair  
House Committee on Agriculture  
United States House of Representatives

The Honorable David Scott  
Ranking Member  
House Committee on Agriculture  
United States House of Representatives

The Honorable Brad Finstad  
Chair  
House Committee on Agriculture Subcommittee on  
Nutrition, Foreign Agriculture, and Horticulture

The Honorable Jahana Hayes  
Ranking Member  
House Committee on Agriculture Subcommittee on  
Nutrition, Foreign Agriculture, and Horticulture

Dear Representatives Thompson, Scott, Finstad, and Hayes,

CSPI opposes the partisan Farm Bill released by the majority last week in the House. The bill attacks SNAP benefit adequacy, cuts key climate-smart agriculture programs, guts the evidence-based process used to update the Dietary Guidelines for Americans, and circumvents school meal nutrition standards in a way that has no place in a Farm Bill. As written, the “Farm, Food, and National Security Act of 2024,” through cuts and programmatic changes, undercuts our nation’s food and nutrition security.

Six in ten SNAP participants point to cost as a major barrier to healthy eating, and SNAP provides critical support to millions of US residents. The Thrifty Food Plan (TFP), which forms the basis of benefit calculations, currently provides less than what low- and moderate-income families report needing to spend on food, despite the long-overdue 2021 TFP update. The bill requires updates to the TFP to be “cost neutral,” meddling with USDA’s ability to keep the TFP (and benefit levels) up to date. This means that even if USDA’s evidence indicates benefits are falling behind the cost of a healthy diet, the bill bars USDA from making any course corrections. This is a step away from more closely aligning SNAP benefits with the true cost of food, such as via the Low Cost Food Plan. This change in policy is estimated to cut SNAP benefits by approximately \$30 billion over the next decade. And changes to the TFP also impact benefit levels for Summer-EBT, funding for food banks, and the Nutrition Assistance Program in US territories. Halting updates to the TFP jeopardizes access to a healthy diet for millions of children, older adults, people with disabilities, and working families.

The House bill claws back key climate-focused resources authorized in the Inflation Reduction Act (IRA). These are programs such as the Environmental Quality Incentive Program (EQIP), the Conservation Stewardship Program (CSP), and the Agricultural Conservation and Easement Program (ACEP), all of which support climate-smart agriculture and forestry practices. These programs are popular – in fact, they’re oversubscribed: roughly 3 in 4 farmers who applied in 2020 and 2022 were turned away due to a lack of funding. These climate-focused resources should be maintained – they help us build a more resilient food supply.

Further, the bill circumvents the evidence-based process through which nutrition standards are set for school meals. Specifically, it includes H.R. 1147, the Whole Milk for Healthy Kids Act, which CSPI opposes. That bill boils down to congressional meddling in the evidence-based nutrition standards for school meals to allow full-fat milk. By exempting the saturated fat in milk from counting towards the weekly limit for school meals, the bill pretends, in effect, that the saturated fat in milk, unlike all other sources of saturated fat, does not exist. This flies in the face of the Dietary Guidelines for Americans (DGA) & the evidence-based process behind those nutrition standards, all to support a single special-interest industry. Moreover, the House Farm Bill does this outside of the accepted jurisdiction of House Agriculture committee and without respect for the formal Child Nutrition Reauthorization process. Industry profits should not and cannot come before our kids' health.

Speaking of the DGA, the House bill takes a wrecking ball to the evidence-based process behind the formation of the DGA, the scientific underpinning for all US nutrition policy and all federal food assistance programs. The bill would codify the politicization of the process by creating a new review board, with members appointed directly by members of Congress, to determine the scientific direction of each DGA update. It also turns its back on modern understandings of the causes of poor diets; it prohibits the DGA update process from considering any social determinants of health such as race, socioeconomic status, or culture and averts the process' gaze from the impacts of any current "regulations relating to nutrition," "food and agricultural production practices," or "social welfare policies." Along those lines, the bill also subverts the ongoing process to develop the 2025-2030 DGA, the first to apply a health equity lens, naming the 2020 DGA the "Controlling Report" until the all the new requirements are met. The changes to the DGA – too many to fully list here – will compromise the scientific integrity of the DGA and divorce it from policy and context that we know impact US residents' ability to access a healthy diet.

Finally, while we were pleased to see the House Farm Bill draw on the SNAP Nutrition Security Act, a bipartisan, bicameral bill that CSPI supports, the House Farm Bill text differs in key ways that CSPI does not support. The goal of the SNAP Nutrition Security act is to advance food and nutrition security for all US residents through SNAP – by gathering data, evaluating the impact of SNAP program changes on participants' food and nutrition security, and making reducing food and nutrition insecurity programmatic objectives of SNAP. Unfortunately, the provisions incorporated into the bill cut out food security and nutrition security altogether, exclusively focusing on diet quality. This is not an approach CSPI supports. Additionally, the House bill runs counter to its stated goal of increasing "access to foods essential to optimal health and well-being" by reducing SNAP funding.

There are some fragments of the bill that represent positive changes, such as removing the draconian SNAP felony drug ban; increasing funding for fruit and vegetable incentives (though not by nearly enough); collecting retailer data that can be used to strengthen SNAP; and establishing evidence-based, culturally responsive nutrition guidelines for food distribution programs. However, these items pale in comparison to the cuts, claw backs, and careless interference in programs. Further, this bill stands in stark contrast to the Senate framework, which makes notable strides in these areas: the Senate framework also removes the SNAP felony drug ban; further increases fruit and vegetable incentives and also decreases the federal match requirement; for the first time requires reporting on both food security, nutrition security, and diet-quality for SNAP and non-SNAP participants; and increases SNAP access for College students. And it does so without slashing SNAP's benefit adequacy.

The attacks on SNAP and climate-focused resources unfortunately override the few positive provisions the bill includes. Additionally, changes to the school meals program have no place in the Farm Bill. Any changes should be evidence-based and considered as part of a larger Child Nutrition Reauthorization Package. And attempting to undercut the DGA is reprehensible.

In sum, CSPI opposes this bill and we urge members of Congress to vote against it. We look forward to a bipartisan Farm Bill that increases access to healthy and sustainable food for everyone in the US by prioritizing food and nutrition security, bolstering fruit and vegetable incentive programs, and increasing access to healthy food in the charitable food system.

Sincerely,

Dr. Peter G. Lurie, CSPI