



American Society for Nutrition
Excellence in Nutrition Research and Practice

June 3, 2021

Melissa R. Bailey, PhD
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue SW
Room 2055-S
Washington DC 20250-0201

Re: Docket Number AMS-TM-21-0034; Supply Chains for the Production of Agricultural Commodities and Food Products; e Citation 86 FR 20652

Dear Dr. Bailey,

The American Society for Nutrition (ASN) appreciates the opportunity to provide input to the U.S. Department of Agriculture (USDA)'s request for comments on "Supply Chains for the Production of Agricultural Commodities and Food Products." ASN is a not-for-profit, professional scientific society dedicated to bringing together the world's top researchers to advance our knowledge and application of nutrition. ASN has more than 7,500 members throughout the world, working in government, clinical practice, academia, and industry, to conduct research that helps all Americans live longer, healthier lives.

ASN applauds the USDA Agricultural Marketing Service (AMS) for recognizing the critical importance of nutrition security to national and economic security. Even before the pandemic, 10.5% of all U.S. households experienced food insecurity at some point during 2019. More households with children, 13.6%, experience food insecurity. The U.S. Census Bureau's Household Pulse Survey data (from April 23-July 21, 2020) indicates food insecurity affected 11% of adults during the pandemic. Approximately 1 in 5 Black and Latinx adults do not have enough to eat. Unfortunately, groups that are most likely to be food insecure also face health disparities due to socioeconomic inequities, insufficient access to health care, and limited access to healthy, nutritious, affordable foods and safe, accessible places to be active.

As the term nutrition security indicates, the issue goes beyond not having enough food to eat but also includes the need for adequate access to healthy and nutritious foods. ASN encourages the USDA to use nutrition guidance and policy documents such as the *Dietary Guidelines for Americans (DGAs)* as a guide to what healthy and nutritious foods we need to produce more of. While the U.S. has traditionally had a strong emphasis on food production, there has been little emphasis on dietary quality and diversity of the foods produced. ASN encourages additional support for the production and preservation of healthy foods, including a wide variety of fruits and vegetables. Dietary guidance such as the DGAs could be used as a guide to compare recommendations to actual production, processing and availability of foods at all points in the food chain, to determine where and how to increase access to healthy and nutritious foods for Americans.

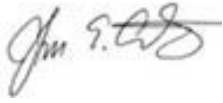
Obesity affects 14.4 million children and adolescents and puts them at significantly higher risk for developing chronic diet-related diseases like diabetes and heart disease later in life. As USDA notes, the nutritiousness of the outputs of America's agricultural and food manufacturing systems are critical to support national, economic, and nutrition security, and emergency preparedness. Food and nutrition insecurity greatly impact national security, with increasing numbers of young Americans unfit for military service due to weight and other health issues negatively impacting our youth.

It is vital that USDA continue its tremendous support for America's nutrition assistance programs, including the National School Lunch program which 30 million kids depend on every day. Many children eat up to half their daily calories at school and school meals contribute substantially to a child's food and nutrition security. For this reason, it is imperative to have strong, evidence-based school meal nutrition standards. In addition, ASN applauds USDA's move to provide free school meals to all students throughout the COVID-19 pandemic. Support for SNAP Education (SNAP-Ed), the Expanded Food and Nutrition Education Program (EFNEP), and other nutrition education and social marketing campaigns will help all Americans improve their nutrition and diet quality. As recommended by the 2019 Government Accountability Office (GAO) report on nutrition education, ASN calls on USDA to designate an agency individual or group to provide cross-department leadership for USDA's nutrition education efforts and facilitate cross-program information sharing. Nutrition research builds the evidence base to support the nutrition assistance and education programs and to back robust nutrition policies that improve access to healthy and nutritious food for all. Significant and needed federal investments in food, nutrition and agricultural research through both mandatory and discretionary USDA programs, particularly the Agriculture and Food Research Initiative (AFRI), are imperative to advance scientific discoveries in nutrition that ensure our nation's health and wellness.

It is critically important that the USDA increase coordination and support for all nutrition programs, research and education as it considers "Supply Chains for the Production of Agricultural Commodities and Food Products." USDA must improve coordination, leadership, staffing, and resources for nutrition programs, research, and education and commit support and leadership to the Interagency Committee on Human Nutrition Research to tackle these challenges. Poor nutrition contributes to poor health, and increased health disparities and health care spending. Greater USDA coordination and investment in nutrition programs, research, and education will positively impact America's agricultural and food systems and therefore positively impact public health, health equity, the economy, and national security.

Thank you again for the opportunity to comment. Please feel free to contact me at 240-428-3643 or jcourtney@nutrition.org if ASN may provide additional information or be of assistance.

Warm regards,

A handwritten signature in dark ink, appearing to read 'John E. Courtney', with a stylized flourish at the end.

John E. Courtney, PhD
Chief Executive Officer, ASN