

July 15, 2022

Via e-mail: WHHungerHealth@hhs.gov

RE: Input for White House Conference on Hunger, Nutrition, and Health

The Council for Responsible Nutrition (CRN) appreciates the opportunity to provide input on the upcoming White House Conference on Hunger, Nutrition, and Health. CRN is the leading trade association for the dietary supplement industry, representing manufacturers of dietary ingredients and of national brand name and private label dietary supplements.¹

Expanding access to supplements including vitamins, multivitamins, and minerals for low-income and underserved populations is critical to a healthy and nourished nation. Further, our industry is already taking steps to increase access to dietary supplements for all Americans. As such, we provide the following recommendations to help achieve the Conference's proposed pillars, while also taking the opportunity to inform the White House on initiatives that are already underway.

Recommendation: Include multivitamin/mineral supplements in the Supplemental Nutrition Assistance Plan benefits

It is well established that Americans are falling short of key nutrients², but research shows that low-income and food-insecure adults are at greater risk for essential nutrient shortfalls.^{3,4,5} Additionally, intakes of several shortfall nutrients are significantly lower in women of childbearing age living in low-income households compared to those in high-income households.⁶ Inadequate nutrient intakes in this group are of particular concern because a mother's nutrition before and during pregnancy, as well as during breastfeeding, impacts the baby's health. Children from food-insecure households also have a higher risk of inadequate nutrient intake.⁷ In older adults, national data show that diet quality tends to be poorer in food-insecure or low-income individuals.^{8,9} Dietary supplements, such as multivitamin/mineral (MVM) supplements, provide shortfall nutrients and have been shown to help fill nutrient gaps. Therefore, increasing access to dietary supplements is a valuable option for helping low-income and food-insecure individuals meet their nutritional needs.

Research specifically demonstrates that users of multivitamin/minerals (MVMs) have a lower risk of vitamin deficiency or anemia than those who do not take dietary supplements. Forty percent of individuals identified as non-users of dietary supplements were shown to be deficient in one or more vitamins and/or anemic, compared to 28% of users of other dietary supplements and only 14% of MVM users.⁴ MVM use is associated with a lower prevalence of inadequate nutrient intakes and decreased risk of nutrient deficiencies, with a more dramatic impact seen in those who take MVM frequently.¹⁰ In addition to data on multivitamins, research suggests that dietary supplements help to reduce the proportion of the U.S. population at risk for inadequate intakes of several micronutrients, with dietary supplements providing a greater contribution to overall intake of some vitamins compared to intake from food.^{5, 3, 11, 12}

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For decades, the Supplemental Nutrition Assistance Program (SNAP), formerly the Food Stamp Program, has provided a lifeline for tens of millions of Americans annually. The program has been successful in helping to feed those who cannot rely on other means. Currently, however, SNAP recipients are prohibited from using benefits to purchase MVM supplements. Amending the program to allow low-income Americans to do so would help address the socioeconomic nutritional gap and thus help achieve several of the goals stated within the Conference's Pillars.

This proposed action falls in line with *Pillar 1- Improve food access and affordability*. While the best way to get all the recommended daily nutrients is to eat a healthy, well-balanced diet, this is not always possible, especially for low-income populations. An MVM can bridge the nutrient gap that is prevalent throughout the country but most severe within low-income populations. Allowing SNAP recipients to use their benefits improves nutrition access and affordability. Further, including MVMs as a SNAP benefit creates no additional costs to the program.

This recommendation also helps to achieve *Pillar 3 - Empower all consumers to make and have access to healthy choices*. As mentioned above, amending SNAP to include MVM supplements creates a level playing field amongst consumers by providing low-income Americans with more choices to improve their nutritional status.

There has been proposed legislation in the past and we recommend the Administration work with Congress to include MVMs in SNAP benefits. This will provide an efficient solution for SNAP recipients looking to ensure adequate intake of essential nutrients. This would give SNAP recipients additional choices at no additional cost.

Recommendation: Ensure adequate resources to regularly update Dietary Reference Intakes

We support efforts that would provide funding and other resources to regularly update existing Dietary Reference Intakes (DRIs) and develop new DRIs for nutrients and bioactives as needed. DRIs are used in developing the Dietary Guidelines for Americans and Reference Daily Intakes for nutrition labeling, among other important programs. We recognize the current efforts to update the DRIs for macronutrients, but other than the DRIs for sodium and potassium, which were most recently published in 2019, the DRIs have not been updated in at least one to two decades. Nutrition labeling, policy, and programs should be based on the totality of available scientific evidence. Using outdated information that does not encompass the growing body of scientific data on nutrients and bioactives does not serve public health.

Ensuring adequate resources to regularly update existing DRIs and establish new DRIs would contribute to *Pillar 2- Integrate nutrition and health*, by giving researchers, policy makers, and healthcare providers up to date information on nutrients and bioactives to help develop programs and recommendations. It would also help to achieve *Pillar 3 – Empower all consumers to make and have access to healthy choices*, since the DRIs impact many dietary recommendations and public programs.

Current private sector initiatives/partnerships to increase nutrition access

Members of the private sector are already contributing to improving nutrition access by working with non-profit organizations that serve low-income and food-insecure individuals and families. Initiatives include education for food bank and food pantry staff, as well as their customers, about the role that

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dietary supplements can play in filling nutrient gaps. Members of the dietary supplement industry also provide monetary and product donations to organizations such as food banks, local food pantries, and school programs to give Americans additional choices to achieve nutritional adequacy. These initiatives will contribute to Pillars 1, 2, and 3.

To broaden industry's efforts to improve nutrition access, CRN has initiated "Act for Access," that challenges all our members to volunteer or donate to non-profit organizations from June through September. So far, we have 100% participation among our board companies, and we expect the initiative to be a resounding success throughout our 200+ members.

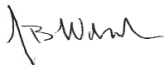
This initiative is an example of what the dietary supplement industry can do in a relatively short period of time – and without a huge goal before us. We encourage you to leverage the enthusiasm, ingenuity, and the market power of our companies to be a part of the solutions you propose in September. We believe we have both the will and the wherewithal to be a part of the solution and will appreciate being tapped as part of the ongoing efforts coming out of the September Conference. We hope to have the opportunity to plan and to talk with you about the form this can take as you prepare for the announcements.

Thank you for the opportunity to provide feedback. We look forward to helping the Administration achieve its mission of eliminating hunger and malnourishment in the United States. We welcome further dialogue leading into the September Conference and beyond.

Sincerely,



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¹ The Council for Responsible Nutrition (CRN), founded in 1973, is a Washington, D.C.-based trade association representing 200+ dietary supplement and functional food manufacturers, ingredient suppliers, and companies providing services to those manufacturers and suppliers. In addition to complying with a host of federal and state regulations governing dietary supplements and food in the areas of manufacturing, marketing, quality control and safety, our manufacturer and supplier members also agree to adhere to additional voluntary guidelines as well as to CRN's Code of Ethics. Learn more about us at www.crnusa.org.

² Dietary Guidelines Advisory Committee. Scientific Report of the 2020 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Agriculture and the Secretary of Health and Human Services. https://www.dietaryguidelines.gov/sites/default/files/2020-07/ScientificReport_of_the_2020DietaryGuidelinesAdvisoryCommittee_first-print.pdf. Published July 2020. Accessed July 14, 2022.

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⁵ Cowan AE, Jun S, Tooze JA, et al. Total Usual Micronutrient Intakes Compared to the Dietary Reference Intakes among U.S. Adults by Food Security Status. *Nutrients*. 2019;12(1):38. Published 2019 Dec 22. doi:10.3390/nu12010038

⁶ Storey ML, Anderson PA. Vegetable Consumption and Selected Nutrient Intakes of Women of Childbearing Age. *J Nutr Educ Behav*. 2016;48(10):691-696.e1. doi:10.1016/j.jneb.2016.07.014

⁷ Jun S, Cowan AE, Dodd KW, et al. Association of food insecurity with dietary intakes and nutritional biomarkers among US children, National Health and Nutrition Examination Survey (NHANES) 2011-2016. *Am J Clin Nutr*. 2021;114(3):1059-1069. doi:10.1093/ajcn/nqab113

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⁹ Leung CW, Wolfson JA. Food Insecurity Among Older Adults: 10-Year National Trends and Associations with Diet Quality. *J Am Geriatr Soc*. 2021;69(4):964-971. doi:10.1111/jgs.16971

¹⁰ Blumberg JB, Frei BB, Fulgoni VL, Weaver CM, Zeisel SH. Impact of Frequency of Multi-Vitamin/Multi-Mineral Supplement Intake on Nutritional Adequacy and Nutrient Deficiencies in U.S. Adults. *Nutrients*. 2017;9(8):849. Published 2017 Aug 9. doi:10.3390/nu9080849

¹¹ Fulgoni VL 3rd, Keast DR, Bailey RL, Dwyer J. Foods, fortificants, and supplements: Where do Americans get their nutrients? *J Nutr*. 2011;141(10):1847-1854. doi:10.3945/jn.111.142257

¹² Cowan AE, Bailey RL, et al. Total Nutrient Index is a Useful Measure for Assessing Total Micronutrient Exposures Among US Adults. *The Journal of Nutrition*. 2022;152(3):863-871. doi:10.1093/jn/nxab428