

July 18, 2022

President Joe Biden
The White House
1600 Pennsylvania Ave NW
Washington, DC 20500

Ambassador Susan Rice
Assistant to the President for Domestic Policy
1600 Pennsylvania Ave NW
Washington, DC 20500

Dear President Biden and Ambassador Rice,

On behalf of the 46 undersigned organizations and our millions of members and supporters, we thank you for your leadership in convening the upcoming White House Conference on Hunger, Nutrition, and Health. To realize the third pillar of the conference, “Empower all consumers to make and have access to healthy choices,” the federal government must lead by example.

To that end, we urge you to issue an Executive Order to require implementation of the *Food Service Guidelines for Federal Facilities* (FSG) in all federally owned and operated facilities. Developed by an interagency working group led by the Centers for Disease Control and Prevention (CDC), the FSG are evidence-based, currently voluntary best practices to align food service in federal facilities with the *Dietary Guidelines for Americans* and advance food safety, facility efficiency, environmental support, and community development.^{1,2}

The Executive Order should also establish a timeline and process for developing and implementing comprehensive, values-driven food procurement standards for federal agencies, whether as part of the FSG or another mechanism. Enclosed is a June 2021 letter from 67 organizations to the U.S. Department of Agriculture that lays out seven value categories that the federal government should align its food purchasing around: local economies, environmental justice, nutrition and health, racial equity, worker justice, animal welfare, and transparency in supply chain data. Leveraging the FSG or another mechanism to promote racial equity and mitigate climate change is also consistent with the goals of several previously issued executive orders, including Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (E.O. 13985), Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability (E.O. 14057), and Climate-Related Financial Risk (E.O. 14030).

The FSG can leverage government purchasing power and operations to improve health outcomes and reduce long-term health care costs—creating net cost savings for the federal government—for the millions of people who rely on federal food service operations, including federal employees, veterans in Veterans Affairs hospitals, members of the armed services, and people who are incarcerated in federal prisons.³

Requiring implementation would be a clear signal to all that the federal government is willing to “walk the walk” when it comes to nutrition and other goals, as the CDC’s own FSG Implementation Toolkit encourages organizations to “put food service guidelines into organizational policies and food vendor contracts.”⁴ This should spur state and local governments and the private sector to adopt similar policies.

Since their inception in 2011, voluntary uptake of the FSG in federal facilities has been sporadic at best, with limited data available on implementation.⁵ We understand that Obama administration officials considered requiring them by executive order, recognizing that the adoption of a consistent, mandatory

policy for all federal executive branch facilities would yield economies of scale, and would facilitate and simplify education, implementation, and enforcement. A report on New York City's Food Standards, enacted by executive order, emphasized the importance of incorporating the standards into a formal policy and agency contracts to ensure sustainable implementation.⁶ Further, implementation can be robust while reflecting the realities of federal food service operations. For example, implementation could be phased in over time, prioritizing facilities that have remained open or reopened at full capacity during the pandemic and incorporating standards into food service contracts as they come up for renewal.

In the same way that federal energy procurement has accelerated the transition to clean energy across the U.S. economy, food procurement and service can be drivers for the just, healthy, and sustainable food system we desperately need. Our proposal is timely not only because it would be a fitting strategy to be announced at September's conference, but also because the CDC recently reconvened the Federal Food Service Guidelines Workgroup. This interagency collaboration is an ideal forum to support policy development and implementation. Further, the undersigned organizations offer our support and assistance.

Responses may be directed to Chloë Waterman at Friends of the Earth (cwaterman@foe.org) and/or Jessi Silverman at the Center for Science in the Public Interest (jsilverman@cspinet.org).

Sincerely,

Academy of Nutrition and Dietetics
Alaska Farmers Market Association
American Public Health Association
American Society for the Prevention of Cruelty to Animals
Association of State Public Health Nutritionists
Balanced
Boulder County Public Health
Center for Biological Diversity
Center for Good Food Purchasing
Center for Food Equity and Economic Development
Center for Science in the Public Interest
ChangeLab Solutions
Chef Ann Foundation
The Common Market
DC Greens
DC Voters for Animals Education Fund
Earthjustice
Ebenezer Pentecostal Church
Environmental Working Group
Farm Forward
Farm to Table New Mexico
Friends of the Earth
FoodCorps
Food Chain Workers Alliance
Four Paws USA
Harvard Law School Food Law & Policy Clinic
HEAL Food Alliance
Health Care Without Harm
Horace Bushnell Children's Food Pantry
Illinois Public Health Institute
Johns Hopkins Center for a Livable Future

Kitchen Sync Strategies
The Laurie M. Tisch Center for Food, Education & Policy at Columbia University
National Association of Pediatric Nurse Practitioners
National Center for Health Research
National Farm to School Network
New Hampshire Farm to School
New Mexico Food & Agriculture Policy Council
Physicians Against Red Meat
Plant Based Foods Association and Plant Based Foods Institute
Prevention Institute
Real Food Media
Redstone Global Center for Prevention and Wellness at George Washington University
Slow Food USA
Society of Behavioral Medicine
Union of Concerned Scientists

¹ The original *Health and Sustainability Guidelines for Federal Concessions and Vending Operations* were developed by the Department of Health and Human Services and the General Services Administration and published in 2011. In 2017, a working group with representatives from nine federal agencies updated the guidelines, at which point they were renamed the *Food Service Guidelines for Federal Facilities*.

² Food Service Guidelines Federal Work Group. *Food Service Guidelines for Federal Facilities*. U.S. Department of Health and Human Services; 2017.

https://www.cdc.gov/obesity/downloads/guidelines_for_federal_concessions_and_vending_operations.pdf.

³ Abrahams-Gessel S, et al. Implementing federal food service guidelines in federal and private worksite cafeterias in the United States leads to improved health outcomes and is cost saving. *J Public Health Pol.* 2022;43:266-280.

<https://doi.org/10.1057/s41271-022-00344-y>.

⁴ Division of Nutrition, Physical Activity, and Obesity, National Center for Chronic Disease Prevention and Health Promotion. Put Food Service Guidelines into Organizational Policies and Food Vendor Contracts. *FSG Implementation Toolkit*. Centers for Disease Control and Prevention. November 19, 2021.

<https://www.cdc.gov/nutrition/food-service-guidelines/strategize-and-act/policies-and-contracts.html>.

⁵ U.S. Government Accountability Office. *Federal Food Service Operations: Implementation of the HHS/GSA Health and Sustainability Guidelines*. December 23, 2014. GAO-15-262R. <https://www.gao.gov/products/gao-15-262r>.

⁶ Lederer A, et al. Toward a Healthier City: Nutrition Standards for New York City Government. *Am J Prev Med.* 2014;46(4):423-428.