A Farm to Fork approach to Fixing FDA’s food program

Following [our recent call for stronger FDA nutrition regulation](https://www.statnews.com/2022/03/14/commissioner-califf-needs-to-put-the-f-back-in-fda/), a [devasting expose of FDA’s growing food and nutrition failures](https://www.politico.com/interactives/2022/fda-fails-regulate-food-health-safety-hazards/), and an [ongoing infant formula shortage FDA seems to have made worse](https://www.washingtonpost.com/business/2022/05/11/baby-formula-shortage-similac-alimentum-elecare-fda/), it has been [argued](https://www.politico.com/news/magazine/2022/04/11/fix-fda-break-it-up-00024423) that the FDA’s food policy woes could best be solved by combining the agency’s food units into a separate organization that reports directly to the Health and Human Services (HHS) secretary. While we wholeheartedly agree that it’s time to move FDA’s food programs, we believe based on our extensive FDA and USDA experience that to create the “farm to fork” food system we need our food and nutrition programs should be consolidated at USDA.

Food and health policy is not only fragmented within the FDA, it’s spread across the government through a patchwork of overlapping authority that has resulted in 200 different efforts across 21 agencies according to [a recent GAO report](https://www.gao.gov/products/gao-21-593). This fragmented system has kept us from reducing the growing toll of diet related disease, which indeed has [gotten worse virtually every year for decades](https://www.cdc.gov/obesity/data/prevalence-maps.html). GAO concluded that Congress should identify and direct one federal entity to lead development and implementation of federal diet and health strategy. We believe it should be USDA.

Disparate groups have called for fundamental changes to our food system to solve the accelerating failures. In addition to GAO, the [Rockefeller Foundation](https://www.rockefellerfoundation.org/report/reset-the-table-meeting-the-moment-to-transform-the-u-s-food-system/), the [American Action Forum](https://www.americanactionforum.org/research/the-economic-costs-of-poor-nutrition/), and the [European Union](https://www.nycfoodpolicy.org/food-policy-snapshot-european-union-farm-to-fork-strategy/) have joined the call for urgent action. In fact, the U.S. Congress recently required the Biden Administration to hold a White House Conference of Food, Nutrition, and Health this year, to address this deepening crisis. It will be the [first such U.S. meeting in more than 50 years](https://sites.tufts.edu/foodnutritionandhealth2019/).

A true “farm to fork” approach to food and nutrition policy that combines the critical elements of a healthy food system: from farming to food processing to our dining tables would be more effective at ensuring the health and safety of our food supply. It would reduce the staggering number of Americans who are made sick by our food, cut the resulting skyrocketing health care costs, and eliminate [the most serious threat to our military readiness](https://www.strongnation.org/articles/14-retreat-is-not-an-option).

USDA is best positioned to succeed due to its history and mission. Created by President Abraham Lincoln to be the “people’s department,” USDA has the comprehensive resources and authorities needed to succeed. These include its [15 nutrition assistance programs](https://www.fns.usda.gov/programs) and their $175 *billion* budget, its [farm executive directors in every state](https://www.fsa.usda.gov/about-fsa/fsa-biographies/state-executive-directors/index) and its [transformative extension agents](https://www.newyorker.com/magazine/2009/12/14/testing-testing-2) in literally every county, and the nation’s [leading food and nutrition research programs](https://www.ree.usda.gov/).

Specifically, we propose that the FDA’s Center for Food Safety and Nutrition (CFSAN) merge with USDA’s Food and Nutrition Service (FNS) and Food Safety and Inspection Service (FSIS) under one Food, Nutrition and Health mission area at the USDA.

This reorganization would allow the federal government to better align its food and nutrition efforts. The FDA and USDA currently pursue similar nutrition goals but often in disjointed ineffective ways. For example, the USDA instituted [needed sodium reduction standards](https://www.cdc.gov/salt/index.htm) for the National School Lunch Program, which led to overall [healthier meals](https://www.fns.usda.gov/school-nutrition-and-meal-cost-study). The FDA has also issued [sodium targets](https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-voluntary-sodium-reduction-goals), but they are voluntary short-term targets for packaged foods that took almost five years to finalize and release (final long-term targets are still forthcoming). Merging CFSAN with FNS and FSIS would allow for more effective and coordinated sodium reduction in both the federal nutrition programs and in the private sector.

Reorganizing the FDA’s food policy responsibilities under the USDA would also lead to stronger acute food safety oversight. The USDA, despite only regulating the safety of [20% of the food supply](https://www.gao.gov/highrisk/improving-federal-oversight-food-safety) (the USDA’s FSIS regulates meat, poultry, some egg products, and catfish, while the FDA regulates most other foods), has more than half of the two agencies’ combined food safety resources.

In addition to funding, the USDA FSIS’s food safety statute is more rigorous than the FDA’s authority. FDA’s implementation of the Food Safety Modernization Act has reinforced its food safety program and promises to make it stronger. Consolidating and building on the strengths and synergies of FDA’s and USDA’s food safety systems would make our food safer.

Merging CFSAN with FNS and FSIS at USDA would also be more likely for Congress to approve. In 1940 after more than 30 years, the FDA [was moved](https://www.fsis.usda.gov/about-fsis/history) from the USDA to the Federal Security Agency, which evolved into today’s Department of Health and Human Services. However, the Congressional Appropriations Subcommittees on Agriculture maintained authority over the FDA even after it was separated from the USDA in 1940. The agriculture appropriations subcommittees would be more likely to support a consolidation and funding the FDA’s food and nutrition activities if they were returned to USDA.

We recognize that the reorganization we are proposing is difficult and will lead some to reflexively howl in protest, which will delay action. However, there are actions that can be taken immediately to improve many of the federal government’s food policy coordination issues.

First, the White House should appoint a Deputy Assistant to the President for Food, Nutrition, & Health who would join the heads of USDA’s & HHS’s food and nutrition programs to lead an empowered [Interagency Committee on Human Nutrition Research](https://www.nal.usda.gov/legacy/fnic/interagency-committee-human-nutrition-research) whose mission would cover all federal food and nutrition policy not just research. The new food & nutrition deputy should also lead planning for the White House Conference on Food, Nutrition, Hunger, and Health. The Conference will provide the ideal launch for a new consolidated USDA Food, Nutrition, & Health mission area.

Whether CFSAN, FNS, and FSIS officially merge or do so virtually while remaining in their silos, our current food policy challenges are too urgent for inaction.