

The Food Fix Campaign wishes to take this opportunity to comment on the Food and Drug Administration (FDA) focus on Front-of-Package Labeling on Packaged Foods. Drawing on extensive experience in functional medicine and a multidisciplinary focus on fixing America's broken food system, we offer these comments in the hope of aiding the critically important work being undertaken to improve awareness and nutrition in America.

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Over the past half century, the U.S. has faced a growing crisis of chronic illness, including obesity, diabetes, and heart disease. These conditions have reduced quality of life and led to suffering, premature deaths, and rising healthcare costs. In addition, these conditions are impairing our economy, weakening security, and placing future generations at tremendous risk.

Among the pertinent facts are these: 6-in-10 American adults now suffer from chronic disease, and 40% have two or more. A stunning 93% of Americans are metabolically unhealthy, meaning they have high blood sugar, blood pressure, cholesterol, are overweight, or have had a heart attack or stroke. And over 34 million Americans are afflicted with diabetes, a number that has doubled since 2000, resulting in more than 1-in-10 Americans being diabetic and therefore at heightened risk of kidney failure, limb amputations, heart attacks, strokes, dementia, and death.

The direct cost of this chronic disease crisis is staggering. According to the Centers for Medicare and Medicaid Services (CMS), our nation's health care bill totaled \$4.3 trillion in 2021 – equivalent to 1-in-5 dollars of our nation's Gross Domestic Product (GDP). Overall, 75% of Medicare spending is devoted to the 40% of beneficiaries diagnosed with four or more chronic conditions. We also rank 30th in the world and last among developed countries in objective health care metrics including life expectancy. Put simply, America spends far more than other nations but is experiencing far worse outcomes.

Some have attributed this crisis to genetics, but the data indicate otherwise. For example, obesity increased 300% – from 13% to 42% – over the past half century. During that same period, however, the genetic makeup of our population didn't significantly change. As a result, the sharp rise in obesity rates cannot be attributed to genetics alone. Instead, a change in our diet and lifestyle is responsible.

Simply put, *the culprit is what we consume*. The modern American diet of ultra-processed food and excessive sugar is driving chronic disease in America. That is why FDA's focus on front-of-package food labeling is so timely and meaningful. As discussed below, we believe improved package labeling is essential to enabling consumers to be better informed so they can make more healthful decisions. Just as crucial, improved food labeling will protect our children and future generations of America from wholly avoidable, diet-driven chronic disease.

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With specific respect to children, their health and future prospects are being weakened by the food they eat. As detailed in *Food Fix: How to Save Our Health, Our Economy, Our Communities, and Our Planet – One Bite at a Time* by Dr. Mark Hyman, millions of American children are growing up on a diet of artificially cheap sugar and processed foods, putting them at risk of learning disabilities, behavioral and emotional challenges, and increased rates of obesity and other chronic diseases.

Today, the average American child consumes a shocking 34 teaspoons of sugar – *every day*. It is no coincidence, therefore, that 1-in-3 American kids is obese, 1-in-6 is suffering a neurodevelopmental disorder, and more than 1-in-10 suffer Attention Deficit Hyperactivity Disorder (ADHD). Pre-diabetes or Type 2 diabetes now afflicts 1-in-4 teenage boys, children as young as two have what used to be called adult-onset diabetes, and many American teenagers are now getting gastric bypass surgery and liver transplants. Additionally, the rates of childhood

depression, cognitive impairment, and developmental disabilities are on the rise, as school performance among kids with poor diets and chronic health conditions is plummeting. Just as troubling, the rate of suicide is rising among American youth and is most evident among children who consume poor diets, are obese, and suffer diabetes or other diet-related health problems.

Sadly, marginalized groups are suffering the deepest disparities in diet, making them especially prone to illness, suboptimal school and work performance, higher health costs, lower productivity and wages, and persistently higher poverty and mortality rates. Just over the past decade, for example, Type 2 diabetes rates have tripled in Native American children, doubled in African American children, and increased 50% in Hispanic youth. The U.S. infant mortality rate is also at a level unmatched by other economically advanced nations, and it is substantially higher among America's ethnic and racial minorities.

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Our nation's future depends on preserving and enhancing the intellectual capital of our people. And yet, that future is in danger as we raise children who are less able to learn, succeed, contribute to, and defend our society. Put another way, our broken food system is destroying the intellectual capital of our youth, with broad consequences for our whole society.

Because America's broken food system is putting our nation's future in jeopardy, we face the first generation of Americans who will live sicker and die younger than their parents. Just as the U.S. Centers for Disease Control and Prevention (CDC) determined "limited access to nutritious food" was a key factor in COVID-19's tragic impact in the U.S., so too is inadequate access to nutritious food a driving force in chronic illness, developmental challenges, and preventable death among our children.

Fortunately, this is not a supply problem. In farms and ranches across America, advanced methods such as Regenerative Agriculture are demonstrating that sustainable, climate-smart

agricultural practices are fully capable of producing better food that has the added benefits of enhanced environmental protection and improved farm economics. Regenerative methods include composting, cover crops, rotational cropping and grazing, reduced tillage, and elimination of chemicals and synthetics, all of which contribute to greatly improved nutrition content of food.

Instead, what America faces a serious demand problem, in that limited access to and awareness of the importance of nutritious food is limiting consumer demand for it. Nutritious food exists, of course, and it can be produced in the volumes needed to prevent chronic disease and promote wellness among our youth. However, consumer demand for such food is impaired by inadequate information.

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At a time when the average American is surrounded by data on a wide array of subjects, information on the impact of the food they feed to their children is much harder to come by. To be sure, consumers are now more informed, thanks to the Nutrition Facts label that has been placed on the back of most food products since passage of the the 1990 Nutrition Labeling and Education Act (NLEA). However, they must do their own research to determine how a particular food product may affect their children's health and development.

To address these challenges, the Food Fix Campaign respectfully suggests that the FDA put particular focus on the development and use of Child Friendly Food Labeling. Specifically, we recommend that consideration be given to the following proposals:

1. The FDA should assess and document the impact on children's physical, cognitive, and emotional development of every packaged food product that is commonly consumed by children and teenagers ("eligible food product").

2. A letter grade, ranging from A+ to F, should be assigned to each eligible food product, reflecting the FDA's determination of its impact on children and teenagers' physical, cognitive, and emotional development.
3. The applicable letter grade should be placed in a visible, color-coded circle on the front of every eligible food product's package, whether the product is sold in a retail or restaurant setting.
4. The Departments of Health and Human Services (HHS) and Education, in partnership with state health and education authorities, should launch an "I Made the Grade!" public awareness campaign to educate consumers and students about the new labeling, the impact of certain foods on children and teenagers, and the healthy choices available to them.

We believe a mechanism such as Child Friendly Food Labeling can have multiple beneficial impacts:

- It would improve consumers' awareness and ability to select foods that will better promote the health and development of their children and teens;
- It would increase consumer demand for nutritious foods, which will have the added benefit of expanding the markets available to producers utilizing regenerative agricultural methods;
- It would incentivize producers of packaged foods to increase the nutrition content of their products, if only to avoid the loss of market share;
- It would serve as the gateway to broader labeling initiatives, encompassing food products typically consumed by adults in addition to those for children and teenagers;

- It would allow for recalibration of the FDA’s budget, which currently allocates far more money to food safety (i.e., prevention of food poisoning) than nutrition, even though the latter has the potential to save exponentially more lives; and,
- It would open the door to policy innovation, such as incentives for recipients of food supports including the Supplemental Nutrition Assistance Program (SNAP) and the Women, Infants, and Children (WIC) program to purchase Child Friendly Food (i.e., food products with a grade of C or higher).

As demonstrated in other countries, improved product labeling results in better-informed consumers and reduced consumption of unhealthful foods and ingredients. In Chile, for example, front-of-package labeling resulted in a dramatic 25% drop in the consumption of sugar-sweetened drinks. Commendably, other countries including Israel, Peru, and Uruguay followed suit and have experienced similar change. As a result, we believe improved food product labeling for American consumers would similarly remove inadequate information as an obstacle to parents and caregivers being able to access and obtain the nutritious food that is so crucial to the health, development, and progress of our children.

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In closing, the Food Fix Campaign is pleased to applaud the FDA’s front-of-package labeling initiative. Due to the risks posed by our broken food system, the importance of this effort cannot be overstated. By increasing consumer awareness of and access to nutritious foods, significant positive change can be achieved for all Americans and the healthcare system on which we all rely. Should you have any questions about the Food Fix Campaign or the perspectives and recommendations offered here, we would be honored to serve as a resource.

Thank you for this opportunity to comment.