



July 15, 2025

The Honorable Robert F. Kennedy, Jr.  
Secretary  
U.S. Department of Health and Human Services  
Chair, Make America Healthy Again Commission

Mr. Vince Haley  
The White House  
Executive Director,  
Make America Healthy Again  
Commission

Dear Secretary Kennedy, Executive Director Haley, and MAHA Commission Members:

On behalf of the International Fresh Produce Association (IFPA), we extend our appreciation to the White House for prioritizing the health and nutrition of all Americans through the Make America Healthy Again Commission.

As the Commission works to publish a strategy around its May report, "Make our Children Healthy Again", we submit the following recommendations for your consideration. This serves as a follow-up to our March letter to the Commission. We remain committed to working with you to reduce the rates of diet-related disease and improve Americans' health.

IFPA is the largest and most diverse association serving the entire fresh produce and floral supply chain. IFPA proudly represents member companies throughout the fresh fruit and vegetable supply chain, including growers, shippers, fresh-cut processors, wholesalers, distributors, retailers, food service operators, industry suppliers, and allied associations.

As a network of members from the fresh produce supply chain, we have long advocated for policies that improve access to and consumption of fruits and vegetables, thereby enhancing public health and supporting growers. We appreciate the Commission's commitment to including farmers in the conversation, as we are uniquely positioned to serve as partners in this work.

As acknowledged in the report, Americans fall woefully short of eating an adequate amount of fruits and vegetables. Many of the government's own nutrition programs also fall short in ensuring Americans meet these targets. There are pockets of promise, such as the Supplemental Nutrition Program for Women, Infants, and Children (WIC), as highlighted in the report, and the National School Lunch Program, which ensures a full serving of fruits *and* vegetables for the nearly 40 million meals served daily. These programs must continue to be supported as they have proven to increase fruit and vegetable consumption.

Yet, despite decades of this evidence-based advice, consumption trends have not budged on a population level. We reiterate that we cannot address our mutual goals without a targeted, systemic approach to increasing Americans' fruit and vegetable consumption.

As the Commission considers strategies to support increased consumption, it's essential to recognize the realities of specialty crop production in the United States. While 75 percent of U.S. specialty crop farms



operate on less than 100 acres, these farms collectively account for only 12 percent of the total acreage dedicated to specialty crops. In contrast, the remaining 25 percent of farms, each more than 100 acres, manage a full 88 percent of the land used for producing specialty crops. This underscores the crucial role that commercial-scale farms play in ensuring all Americans have access to fruits and vegetables. To deliver on our shared goal of transforming the American diet, any policy framework must ensure that resources, incentives, and regulations are appropriately aligned with the dynamic structure of fresh produce production.

As the commission works to deliver on the Executive Order's directive, we appreciate your consideration of the following:

**Recommendation #1: Embed Produce Prescriptions as a Covered Benefit within the Health System.**

*Rationale:* With more than 80 percent of healthcare dollars allocated to preventable chronic disease, we must integrate evidence-based nutrition interventions into the standard practice of clinical care<sup>i</sup>. Federal health programs, including Medicare, Medicaid, and those served by the Department of Veterans Affairs and Indian Health Service, respectively, can cover more than 150 million Americans.

We are grateful that during the first Trump Administration, Health and Human Services (HHS) addressed administrative barriers that allowed states to implement food interventions. We urge the Commission to support this work further and create a sustainable pathway for coverage. Providing an evidence-based produce prescription to patients who are eligible due to diet-related health risks or conditions, food insecurity, or other documented challenges in accessing nutritious foods, will systematically improve fruit and vegetable consumption and reduce factors that contribute to diet-related chronic diseases.

Nutrient-dense food interventions have been shown to reduce healthcare costs<sup>ii</sup>. Additionally, 80 percent of Americans believe food interventions should be included in Medicare and Medicaid<sup>iii</sup>. The federal government and HHS are well-positioned to lead the effort within federal healthcare programs, which can, in turn, provide a pathway for private insurers to cover additional Americans at risk for, or suffering from, diet-related disease.

**Recommendation #2: Promote Nutrition Clarity in Food Labeling of Fruits and Vegetables at the U.S. Food and Drug Administration (FDA).**

- Require foods that make fruit and vegetable claims (in name or imaging) to disclose the quantity of fruits and vegetables per serving in household measures (e.g., "contains 1/8 teaspoon of strawberries per 1-cup serving").
- Require foods depicting fruits and vegetables (in name or imaging) that lack any meaningful amount in forms consistent with DGA, to bear "contains no fruits and vegetables" disclosure.

*Rationale:* Nearly all Americans, regardless of socioeconomic status, under consume fruits and vegetables. Every time a consumer seeks nutritious food and is sold a food or beverage that undermines their health, it



is a missed opportunity to reduce diet-related disease. Food and nutrition labeling impacts everyone. We know that more than half of all consumers regularly examine the nutrition facts label or ingredients list when shopping and 40 percent say they consider labeling statements about health and nutrition benefits<sup>iv</sup>.

To ensure that Americans are empowered to make healthful decisions and not misled as they make food choices for themselves and their families, the FDA should require clear and transparent declarations on foods that make fruit and vegetable claims. A meaningful amount should only apply to fruits and vegetables in forms consistent with the Dietary Guidelines for Americans recommendations to consume “mostly whole” fruits and vegetables. FDA should move forward with efforts to finalize the proposed front-of-pack labeling, but should first further strengthen the label, including fruit and vegetable disclosures. Our full recommendation on labeling can be referenced in our recent comment on FDA’s proposed rule on Front of Pack Nutrition Labeling (Document ID: FDA-2024-N-2910-0001)

### **Recommendation #3: Financially Incentivize Fruits and Vegetables for All Americans.**

- Make fruits and vegetables an authorized expense under both Health Savings Accounts (HSAs) and Flexible Savings Accounts (FSAs)
- Federal tax credit for fruit and vegetables that meet DGA recommendations

*Rationale:* As previously shared, the Centers for Disease Control and Prevention (CDC) data show that nine out of ten Americans do not meet DGA recommendations, including those across all socio-economic levels. Providing financial incentives through FSAs, HSAs, and tax credits could catalyze an increase in consumption and reduce diet-related disease on a population level.

### **Recommendation #4: Expand the Fresh Fruit and Vegetable Program (FFVP) to all elementary schools, and work towards expanding the program to all elementary, middle, and high schools.**

*Rationale:* Congress first allocated funding for the FFVP in 2002 and quickly expanded to all states and territories due to its success and popularity. A U.S. Department of Agriculture (USDA) evaluation found FFVP increases consumption among low-income students, helps reduce plate waste at school meals, and, most notably, can reduce obesity rates by three percent<sup>v</sup>. The program is currently oversubscribed, with many more districts (all low-income) applying than can be funded. Expanding options to participate in FFVP to all schools could significantly improve access to fruits and vegetables.

### **Recommendation #5: Recalibrate and modernize USDA purchasing programs to address nutrition insecurity and reach additional communities and nonprofit entities.**

- USDA should procure and distribute foods, including a wide variety of fresh fruit and vegetables, in amounts that will systemically address consumption deficits for those who lack consistent access.
- Distribution programs should expand access to reputable nonprofits meeting the needs of their communities if not currently being reached by USDA Emergency Feeding Programs.



*Rationale:* While direct USDA purchases tend to fall within the federal nutrition guidelines, most USDA emergency feeding programs do not include a wide variety of fresh fruit and vegetable options, including the Emergency Feeding Assistance Program (TEFAP), Food Distribution for Indian Reservations (FDIPR), and the Commodity Supplemental Food Program (CFSP) for seniors. The Fiscal Year 2023 USDA State of Origin report shows that only ten varieties of fresh produce commodities were purchased. While this represents more than double the variety since 2020, growers across the country are left out of these programs because we rely on an approach that largely does not work for fresh produce<sup>vi</sup>.

USDA's use of a lowest-cost bid model, coupled with a procurement and delivery system not designed to be inclusive of fresh fruits and vegetables, has had the unintended consequence of leaving out the majority of domestically grown fresh fruits and vegetables from USDA emergency feeding programs. Additionally, limiting distribution to TEFAP recipient agencies has resulted in many reputable nonprofits being unable to access foods to meet the needs of particularly hard-to-reach populations. The Trump Administration's Farmers to Families Food Box Program showed that it is possible to provide fresh produce to those in need by utilizing the existing supply chain. While the circumstances are different today, lessons learned from the program should be incorporated into USDA procurement programs.

**Recommendation #6: Expand fruit and vegetable purchases within the Supplemental Nutrition Assistance Program (SNAP).**

*Rationale:* USDA research shows that SNAP recipients must allocate 40 percent of the SNAP benefit on fruits and vegetables to meet DGA targets <sup>vii</sup>, <sup>ix</sup> While fruits and vegetables cost less per serving than many less nutrient-dense foods, consumer perception drives consumption challenges <sup>x</sup>. Incentivizing fruits and vegetables in SNAP can help directly address this barrier.

**Recommendation #7: Collect and analyze purchasing data from all federal feeding and nutrition programs as a mechanism to measure alignment with, and progress towards, achieving nutrition security.**

*Rationale:* Improving health and reducing chronic disease will require partnership between the public and private sector, including government, industry, academia, and the philanthropic and nonprofit sectors. Data available on foods available and accessed across the federal government's nutrition programs can aid efforts to improve availability, demand, access, and ultimately, consumption of foods consistent with nutrition recommendations. Additionally, clear data will enable the federal government to consistently measure progress toward goals aimed at improving healthy eating among Americans.

**Recommendation #8: Support robust product assessment and registration efforts in EPA's Office of Pesticide Programs to bring new, effective, and safer products to fresh produce growers.**

*Rationale:* Efficient and sufficient production of healthy fruits, vegetables, and tree nuts for a growing population requires resources (e.g., water, soil, and fertilizer) and protection from weeds, pests, and pathogens (e.g., pesticides and cultural practices). The Food and Agriculture Organization of the United Nations (FAO) estimates that 20-40%



of global food production is lost annually to pests and pathogens. Without the necessary tools to protect our specialty crops, losses would soar to 78 percent for fruits and 54 percent for vegetables <sup>xi</sup>. Crop protection is achieved through multiple approaches, including plant breeding, modern biological technologies, biological and chemical pesticides, and cultural practices, which rely on trusted and high-functioning regulatory systems to bring these products to market. It is imperative to recognize that technological tools are rapidly evolving, and that the regulatory review and approval must continue to focus on the properties of the product itself. Domestic producers must have access to safe, modern, and the most innovative plant breeding and crop protection tools possible.

**Recommendation #9: Appropriately allocate funds as directed by Congress in support of the USDA-ARS and land-grant university system for research efforts in specialty crop production and protection innovation.**

*Rationale:* New practices and products that support healthy, safe, and efficient crop production begin with research. However, unlike row crops, which have large multinational companies leading much of their research efforts, the more than 350 different specialty crops are reliant on USDA-ARS and our land-grant university system for innovation <sup>xii</sup>. Farm Bill programs like the Specialty Crop Research Initiative (SCRI) and Specialty Crop Block Grants, as well as congressionally appropriated funds in support of USDA's specialty crop pest management, mechanization, plant breeding, and other efforts, are vital to our ability to continuously improve our production practices and grow a healthier crop. We are aware that many of these projects at universities and USDA-ARS locations nationwide are at risk and have not yet received their allocations. If these programs are shut down or lose capacity, the ability to innovate and improve crops, as well as reduce risk, will be significantly hampered.

**Recommendation #10: Support and incentivize regenerative agriculture production systems.**

*Rationale:* The fresh produce industry defines regenerative agriculture as a suite of sustainable farming practices that are holistic and outcome-based, improving soil health, enhancing biodiversity, optimizing water use, and building climate resilience. This includes practices such as minimal soil disturbance, cover cropping, diverse crop rotations, and integrated pest and nutrient management. Thriving regenerative agriculture relies on both organic and conventional tools of production, utilizing modern technologies alongside those rooted in ancestral knowledge. By incentivizing the adoption of these production systems, the federal government can significantly contribute to the profitability of agricultural production, environmental sustainability, reduce the footprint of food production, and ultimately yield nutrient-dense fruits and vegetables. Supporting investments in voluntary and incentive-based transitions to and scaling of regenerative approaches will not only bolster the long-term viability of the fresh produce industry but also strengthen our nation's food security by building more resilient and productive agricultural landscapes.





The fresh produce industry sincerely appreciates the awareness being raised around the need to address our diet-related health crises. We are partners in this work and stand ready to support you in implementing strategies that will increase fruit and vegetable consumption and create a vibrant future for all Americans.

Sincerely,

A handwritten signature in black ink, appearing to read "Cathy Burns".

Cathy Burns  
CEO  
International Fresh Produce Association

CC:

The Honorable Brooke Rollins, Secretary, U.S. Department of Agriculture  
The Honorable Scot Turner, Secretary, U.S. Department of Housing and Urban  
Development The Honorable Linda McMahon, Secretary, U.S. Department of Education  
The Honorable Doug Collins, Secretary, U.S. Department of Veterans Affairs  
The Honorable Lee Zeldin, Administrator, U.S. Environmental Protection  
Agency The Honorable Russell Vought, Director, Office of Management and  
Budget  
The Honorable Dan Scavino, Assistant to the President and Deputy Chief of Staff for  
Policy The Honorable Kevin Hassett, Director, National Economic Council  
The Honorable Stephen Miran, Chair, Council of Economic Advisors  
The Honorable Michael Kratsios, Director, Office of Science and Technology Policy  
The Honorable Sara Brenner M.D., Commissioner, Acting, U.S. Food and Drug  
Administration The Honorable Susan Monarez, Director, Acting, Centers for Disease  
Control and Prevention The Honorable Matthew Memoli M.D., Director, Acting, National  
Institutes of Health





- <sup>i</sup> National Health Expenditure Data: Historical. Center for Medicare & Medicaid Services. December 15, 2021. Accessed May 5, 2022. <https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/NationalHealthExpendData/NationalHealthAccountsHistorical>
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- <sup>iii</sup> Ridberg R, Reedy Sharib J, Garfield K, Hanson E, Mozaffarian D. Food is Medicine in the US: A National Survey of Public Perceptions of Care, Practices and Policies. March 12, 2025. [Health Affairs](#); 0278-2715; 1544-5208
- <sup>iv</sup> International Food Information Council Foundation. 2018 Food and Health Survey. Washington, DC: International Food Information Council Foundation, 2018.
- <sup>v</sup> Bartlett, S., Olsho, L., Klerman, J., et al. (2013). Evaluation of the Fresh Fruit and Vegetable Program (FFVP): Executive Summary. Prepared by Abt Associates under Contract No. AG3198-D-09-0053. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Project Officers: Karen Castellanos-Brown and Allison Magness
- <sup>vi</sup> <https://www.fns.usda.gov/research/usda-foods-state-origin-usda-foods>
- <sup>vii</sup> Young, S. K., & Stewart, H. (2022). U.S. Fruit and Vegetable Affordability on the Thrifty Food Plan Depends on Purchasing Power and Safety Net Supports. *International journal of environmental research and public health*, 19(5), 2772. <https://doi.org/10.3390/ijerph19052772>
- <sup>viii</sup> Carlson A., Frazao E. Food Costs, Diet Quality and Energy Balance in the United States. *Physiol. Behav.* 2014;134:20–31. doi: 10.1016/j.physbeh.2014.03.001
- <sup>ix</sup> Young, S. K., & Stewart, H. (2022). U.S. Fruit and Vegetable Affordability on the Thrifty Food Plan Depends on Purchasing Power and Safety Net Supports. *International journal of environmental research and public health*, 19(5), 2772. <https://doi.org/10.3390/ijerph19052772>
- <sup>x</sup> Carlson A., Frazao E. Food Costs, Diet Quality and Energy Balance in the United States. *Physiol. Behav.* 2014;134:20–31. doi: 10.1016/j.physbeh.2014.03.001
- <sup>xi</sup> *Int. J. Environ. Res. Public Health* 2021, 18(3), 1112; <https://doi.org/10.3390/ijerph18031112>
- <sup>xii</sup> Fuchs M et al. Economic Studies Reinforce Efforts to Safeguard Specialty Crops in the United States. *Plant Dis.* 2021 Jan;105(1):14-26. doi: 10.1094/PDIS-05-20-1061-FE. Epub 2020 Oct 29. PMID: 32840434.

