



November 24, 2025

SNAP Retailer Policy Division
Food and Nutrition Service
USDA
1320 Braddock Place
Alexandria, VA 22314

**Re: Docket No. FNS-2025-0018: Updated Staple Food Stocking Standards for
Retailers in the Supplemental Nutrition Assistance Program, Proposed Rule**

To Whom it May Concern:

The International Dairy Foods Association (IDFA), Washington, D.C., appreciates the opportunity to comment on the Proposed Rule regarding the variety of staple foods in the Supplemental Nutrition Assistance Program (SNAP). Dairy represents one of the staple food groups in SNAP; as a result, we feel it is important to ensure that SNAP participants have access to nutritious dairy products.

IDFA represents the nation's dairy manufacturing and marketing industry, which supports more than 3 million jobs that generate \$198 billion in wages and \$779 billion in overall economic impact. IDFA's diverse membership ranges from multinational organizations to single-plant companies, from dairy manufacturers and cooperatives to food retailers and suppliers, all on the cutting edge of innovation and sustainable business practices. Together, they represent most of the milk, cheese, ice cream, yogurt and cultured products,

and dairy ingredients produced and marketed in the United States and sold throughout the world. Delicious, safe and nutritious, dairy foods offer unparalleled health and consumer benefits to people of all ages.

Dairy is an Important Part of a Healthy Diet and Should be Encouraged for Consumption by SNAP Participants

Dairy is a key component of nutritious eating patterns for Americans of all ages. Milk and dairy foods provide 13 essential nutrients, including three nutrients of public health concern that are under-consumed (calcium, potassium, vitamin D). The preponderance of evidence confirms that dairy is a key component of healthy eating patterns associated with better health outcomes, including reduced risk of Type 2 diabetes and hypertension;¹ and provides better growth outcomes for children.² The complete dairy matrix has been linked to a variety of health and nutritional benefits.³

However, 90% of Americans do not meet Dietary Guidelines for American (DGA) recommendations for the consumption of dairy products,⁴ which means they are missing important nutrients and a key contributor to healthy diets. IDFA feels strongly that nutrition policies for federal nutrition programs including SNAP, must not intentionally or inadvertently discourage the consumption of nutrient-rich, yet under-consumed, food groups such as dairy.

SNAP's stocking requirements influence the availability of foods to SNAP households and can encourage healthier choices. From a survey of American consumers last year, more people in households not eligible for SNAP agreed that dairy is essential to a healthy and

¹ U.S. Department of Agriculture and U.S. Department of Health and Human Services. *Dietary Guidelines for Americans, 2020-2025*. 9th ed. Washington, DC: USDA and HHS; Dec 2020. Available from: <https://www.dietaryguidelines.gov/>

² U.S. Department of Health and Human Services and U.S. Department of Agriculture. *Scientific Report of the 2025 Dietary Guidelines Advisory Committee* [Internet]. Washington, DC: USDA and HHS; 2024 Dec. Available from: https://www.dietaryguidelines.gov/sites/default/files/2024-12/Scientific_Report_of_the_2025_Dietary_Guidelines_Advisory_Committee_508c.pdf

³ Mulet-Cabero AI, Torres-Gonzalez M, Geurts J, Rosales A, Farhang B, Marmonier C, Ulleberg EK, Hocking E, Neiderer I, Gandolfi I, Anderson L, Brader L, Vermaak M, Cameron M, Myrup Christensen M, Haryono R, Peters S. The Dairy Matrix: Its Importance, Definition, and Current Application in the Context of Nutrition and Health. *Nutrients*. 2024 Aug 31;16(17):2908. doi: 10.3390/nu16172908. PMID: 39275224; PMCID: PMC11397276.

⁴ Federal Data Analysis Team and 2025 Dietary Guidelines Advisory Committee. November 2024. Usual Intakes of Food Groups, Subgroups, and Components and Comparison to Recommendations: Individuals Ages 6 Months and Older: Supplementary Data Analysis for the 2025 Dietary Guidelines Advisory Committee. U.S. Department of Health and Human Services, Office of the Assistant Secretary for Health, Office of Disease Prevention and Health Promotion. U.S. Department of Agriculture, Food and Nutrition Service, Center for Nutrition Policy and Promotion. Available at: <https://www.dietaryguidelines.gov/2025-advisory-committee-report/data-analysis>

balanced diet than those in SNAP-eligible households (78% versus 74%). In addition, significantly more people in households that are not SNAP-eligible (74%) agree with the statement, that the “positive health benefits of dairy outweigh any health concerns [they] have” when compared with those in SNAP-eligible households (61%).⁵ But children in households participating in SNAP do consume more milk than children in households that are eligible but do not participate.⁶ This underscores the important role SNAP plays in ensuring children’s access to nutrient-rich milk.

To facilitate and encourage dairy consumption by SNAP participants, IDFA agrees that dairy should continue to be one of the four staple food categories used to determine eligibility for retail stores to participate in SNAP.

Staple Food Requirements Should Ensure Access to a Variety of Dairy Products

For Americans to benefit from the nutrition of dairy products, they must be able to procure those products in a form that meets their preferences for taste, nutritive value and convenience. And for Americans that participate in SNAP, they must be able to access these products and to use their SNAP benefits in stores that are convenient to them.

For stores to participate in SNAP and provide nutrient rich dairy foods, the stocking requirements must be achievable for a variety of retailers, including those with differing amounts of available shelf space. If the USDA maintains the proposed requirement that seven items in each staple food category must be stocked in a SNAP-participating store, we urge it to provide flexibility within the dairy subcategories. For example, rather than all refrigerated fluid milk contributing as a single dairy item, different fat levels, lactose free options and unflavored and flavored varieties should count separately toward the mandatory number of products in the dairy category. In addition to refrigerated milk, non-refrigerated forms of milk, including shelf-stable fluid milk and dry milk should count toward the minimum number of dairy products. Similarly, hard, semi-soft, soft and pasteurized cheese types and different varieties of yogurt, including those that are spoonable and drinkable with varying fat levels, Greek and non-Greek, and flavored vs non-flavored, should count separately toward the dairy stocking requirement. Adopting our aforementioned recommendations would provide consumers with the option to purchase

⁵ International Food Information Council (IFIC). Understanding Fluid Milk & Dairy Food Consumption Patterns to Enhance Diet Quality & Nutrition Equity. May 2024.

⁶ de Brito JN, Loth KA, Fertig A, Trofholz AC, Tate A, Berge JM. Participant characteristics and dietary correlates of SNAP and other assistance programs among families with children from racially and ethnically diverse households. *Appetite*. 2022 Jul 1;174:106015. doi: 10.1016/j.appet.2022.106015. Epub 2022 Mar 29. PMID: 35364114; PMCID: PMC9058240.

the forms and types of dairy foods, including milk, yogurt and cheese, that they prefer with the potential to increase the consumption of these nutrient-rich foods.

Importantly, allowing flexibility for stocking a variety of dairy products will allow more small retailers to continue their participation in SNAP, providing more locations for SNAP participants to purchase nutritious food.

Spreadable Cheeses Should be Included as Part of the Cheese Category

Cheeses, both standardized and non-standardized, are available in a variety of forms, including blocks, shreds and shapes. Additionally, some cheese is sold in spreadable form, labeled as “spreadable cheese;” these cheeses are naturally softer, with a texture that is spreadable, or may be specially made to have a softer texture. Spreadable cheese is often eaten in similar amounts to other cheeses, with a serving size of approximately 1 ounce. These cheeses may contain significant amounts of calcium, vitamin A and vitamin D and often serve as a significant contributor to a snack. This differs from cheese dips, which are often consumed in relatively small amounts and therefore would not contribute significant nutrients to a diet. Therefore, due to the potential contribution to an overall diet, IDFA recommends that spreadable cheese be included in the cheese category as part of the dairy staple food category.

A Regulatory Definition for “Accessory Foods” is Not Necessary

This proposed rule is appropriately focused on ensuring that SNAP-participating retailers stock adequate amounts of staple foods that serve as the basis for snacks and meals, rather than accessory foods. By not including accessory foods in the categories of staple foods, they will not count toward the stocking requirements; IDFA therefore believes it is not necessary to define accessory foods or otherwise identify foods that would not be counted toward staple foods. A regulatory definition for accessory foods would simply add unnecessary complication to the regulations and would not align with the Administration’s de-regulatory agenda. In addition, there is guidance that provides clarification and examples of accessory foods⁷ so a further regulatory definition is unnecessary and could be confusing or misapplied.

IDFA’s member companies are proud of the nutritious dairy products they provide to Americans. They look forward to continuing to provide those products through federal nutrition programs, including SNAP.

⁷ <https://www.fns.usda.gov/snap/retailer/accessory-foods>

Regards,

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