

November 24, 2025



The Link Between Grain and Goodness

James C. Miller
Administrator
Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place
Alexandria, Virginia 22314

RE: FNS-2025-0018 / RIN 0584-AF12

Dear Mr. Miller:

On behalf of our nation's grain millers, the North American Millers' Association (NAMA) welcomes the opportunity to submit comments on the U.S. Department of Agriculture (USDA) *proposed rule on updated staple food stocking standards for retailers in the Supplemental Nutrition Assistance Program (SNAP)*.

NAMA represents millers of wheat, corn, oats, and rye across the continental United States, Puerto Rico, and Canada. Millers grind raw grains grown on the farm into flour, cereals, and other ingredients used to make a wide variety of food options that are affordable and available year-round. Located in communities across the country, our members serve as an indispensable link between raw grain and foods that have sustained and enriched people's lives for centuries. NAMA members are concerned about the updated groupings under the proposal for the grain category varieties and their effect on eliminating choices for consumers, especially in rural areas.

NAMA supports the administration's goal of expanding healthy options for individuals participating in SNAP. As written, however, the proposed rule will not achieve that outcome because of how narrow the grains category is defined. This can be fixed simply by returning to the language of the 2019 proposed rule in the grains food category. By departing from the first Trump administration's 2019 proposed rule on this topic, the current proposal now risks pushing tens of thousands of convenience stores out of SNAP, dramatically narrowing the number of stores where SNAP beneficiaries can purchase food and creating food deserts, especially in rural America. For example, more than 118,000 convenience stores participate in the program, the largest share of any store format and accounting for nearly half (45%) of all SNAP-authorized stores.¹

The Importance of Distinguishing Grain Varieties

As written, the proposal defines varieties of staple foods within the grains category in a way that departs from common understandings of what constitutes different foods and restricts potential offerings in ways that are unworkable for consumers.

¹ Food and Nutrition Service, SNAP Retailer Management Year End Summary FY 2024, *available at* <https://www.fns.usda.gov/data-research/data-visualization/snap-retailer-management-dashboard-fy24>.

Overly restrictive definitions that do not match the differences in the way consumers buy, cook, and eat foods should be avoided. A final rule should recognize that foods that are made differently or have different primary ingredients are also different “varieties” of foods. The proposal currently creates broad, diversified groupings of foods within the grains category that ignores meaningful differences among products, making compliance by many food stores difficult or impossible to achieve.

For example, the proposed rule groups a wide variety of very different foods under the catch-all heading of “Breakfast Cereals/Foods” and declares that those foods all constitute a single staple food variety for purposes of compliance with the requirements for a retail food store in SNAP. These different foods, which would not count as different varieties under the proposal, include all grain-based breakfast cereals, many different combinations of sandwiches with sausage, bacon, egg or cheese on them (if a grain is the primary ingredient), frozen waffles, pancake mix, and other items that the proposed rule deems as being eaten at breakfast.

The foods in this newly created single staple food variety are very different. These foods have different primary ingredients (i.e., different grains such as wheat, rice, oats, and corn). These foods have different secondary ingredients (with some including very significant amounts of meat, eggs, or cheese and some not including those items at all). These foods are also made very differently with some being ingredients for cooking a finished food (pancake mix), others being baked products that require heating to be served (frozen waffles), and others able to be eaten straight from the package (though often combined with milk in the case of cereals).

There is no rational basis for tying these foods together as though they are all the same staple food. In fact, the assumption that these foods are eaten in the morning as part of the first meal of the day (“breakfast”) is far from universal. Many of these foods are eaten or served at all hours of the day and night. A 2021 Harris poll, for example, found that 79% of people eat foods that are often considered “breakfast” foods outside of the traditional daypart associated with breakfast.²

Even if these foods were only eaten in the morning, this would not justify grouping them together as a single staple food. A grouping of distinct foods such as a turkey and a ham into a single staple food, for example, similarly would not make sense even though those foods are often eaten at dinner.

Another example that dramatically narrows the different staple foods that stores can offer in order to qualify for SNAP is the “Bread” category. This category, which was newly created by the proposed rule and counts as a single staple food, includes food items as different as bagels, tortillas, loaves of bread, English muffins, and several other foods that have a grain as a primary ingredient. These foods are deemed to be counted as a single staple food even though they often have a different primary

² “Explore the Endless Opportunities of All Day Breakfast,” National Restaurant News (Nov. 7, 2023) (available at [Explore the Endless Opportunities of All-Day Breakfast](#)).

ingredient – whether the food in question has wheat, rice, oats, or corn as the primary ingredient is not taken into account in the proposed rule.

What is clear about the “Breakfast,” Bread,” and “Pasta” categories is that staple foods that consumers recognize as different, use differently, and do not see as interchangeable, are seen and treated as though they are a single, interchangeable staple food. That violates the letter and the spirit of the 2014 farm bill and subsequent appropriations language, and makes the proposed rule unworkable.

These problems were not present in the grains category in the 2019 proposed rule. That proposal recognized that more flexibility should be granted in this category. While the 2016 final rule subdivided five discrete varieties in the breads/cereals staple food category, the Trump administration provided even more flexibility for stores to meet their stocking requirements, allowing for stores to count additional products as different as loaves of bread, bagels, English muffins, crescent bread, flatbread, and many other such products as distinct staple food varieties. That approach recognized that these foods were made differently, had different ingredients, were used differently by consumers, that consumers recognize and treat them as different foods, and that these foods are not seen as interchangeable by consumers.

The 2019 proposed rule went even further, recognizing that 100% whole-grain products and their less-than-100% whole-grain counterparts are meaningfully different foods with different consumer uses. Accordingly, the 2019 proposal allowed these products to count as two separate varieties, effectively doubling the number of viable options within the grains category and giving retailers the flexibility needed to meet the increased stocking requirements. This balanced approach expanded nutritious choices for SNAP customers while keeping compliance achievable for stores.

Recommendation: USDA should amend the proposed rule by eliminating the Breakfast, Bread, and Pasta subcategories of foods, while offering more flexibility to count whole-grain and non-whole-grain products as separate varieties. The final rule should return to a framework that recognizes that different staple foods are, in fact, different. SNAP stocking requirements already group staple foods into four categories (meat, dairy, grains, and fruits/vegetables). Further subdividing these categories only limits smaller stores' ability to count products that consumers know and recognize as distinct foods.

We welcome the opportunity to work with the department to address these issues and support a final rule that enhances SNAP consumer choice while ensuring consumers have adequate access to food that meets their nutritional needs.

Sincerely,

Kim Z Cooper
Vice President, Government Affairs
North American Millers' Association

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