



A Jewish Response
To Hunger

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November 24, 2025

James C. Miller
Administrator, Food and Nutrition Service
United States Department of Agriculture

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Washington, DC 20005
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Re: Notice of Proposed Rulemaking: Updated Staple Food Stocking Standards for Retailers in the Supplemental Nutrition Assistance Program RIN 0584-AF12

Dear Mr. Miller,

MAZON: A Jewish Response to Hunger provides these comments in response to the Food and Nutrition Service (FNS) Notice of Proposed Rulemaking (NPRM) regarding Updated Staple Food Stocking Standards for Retailers in the Supplemental Nutrition Assistance Program (SNAP). Given the numerous changes facing SNAP in recent months, MAZON cautions against these unnecessary updates to the program that will increase confusion among retailers, state SNAP administrators, and beneficiaries.

Inspired by Jewish values and ideals, MAZON is a national advocacy organization working to end hunger among people of all faiths and backgrounds in the United States and Israel. For 40 years, MAZON has been committed to ensuring that people have access to the resources they need to be able to put food on the table. MAZON is a leading voice on anti-hunger issues, including those that have been previously overlooked or under-addressed. This mission includes protecting federal food programs for all families and individuals who rely on these programs to nourish themselves.

As an organization in its fifth decade of working to end hunger in America, MAZON knows that the proposed rule will affect approximately 266,000 SNAP-authorized retailers, including supermarkets, convenience stores, small grocery stores, and other local establishments. MAZON is concerned that more than doubling the required varieties from three to seven across each of the staple food categories, in addition to requiring that at least one variety in at least three categories be perishable, will be unworkable for many SNAP retailers. These stores may lack the refrigeration capacity, storage, and shelf space needed to comply, and rectifying these deficiencies could lead to higher utility costs, greater food waste, and increased distribution expenses. These costs will be felt most acutely by retailers that operate in rural and remote areas or so-called “food deserts,” where they may be the only available SNAP retailer for miles.

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These burdens will ultimately affect SNAP consumers, particularly those in areas where it is already challenging to access healthy food. Any new costs incurred by retailers are likely to be passed on to customers, reducing purchasing power for SNAP beneficiaries. In some cases, retailers may opt to withdraw from the program entirely if compliance proves too difficult or costly, forcing beneficiaries to travel farther to reach another SNAP-authorized store. This outcome would undermine the program's core purpose of providing adequate nutrition to those who need it.

The recent interruption in SNAP benefits due to USDA's choices during the government shutdown illustrated the essential role SNAP dollars play across the country. USDA has estimated that every dollar spent through SNAP benefits can cause total economic activity to increase by \$1.50.¹ And many retailers were concerned that a prolonged loss of SNAP dollars in their stores would cause those businesses to close.²

In addition to driving retailers from the program and harming local economies, this rule creates an enormous burden on SNAP administrators in all 50 states who are currently struggling to implement myriad other harmful changes to the program foisted upon them this year. In practice, if a SNAP retailer is found to be out of compliance with new stocking requirements, there is a risk that recipients who used their benefits at that retailer can also be charged with a program violation. Given the fluctuation of the laws, regulation, and guidance that govern SNAP and the strain it is already causing on program administration, accusations could occur despite no ill intent on the part of the retailer nor the beneficiary. Considering the recent unfounded comments by the Secretary of Agriculture about the program being "corrupt"³ and the blatantly false comments from USDA saying, "rates of fraud were only previously assumed"⁴, any rule change that increases the chance that program participants would be improperly charged with misusing their benefits must be viewed with extreme suspicion.

In light of these concerns, MAZON does not believe that this is an appropriate time to make changes to the standards for SNAP retailers. As USDA notes in the Supplementary Information of this current proposal, the rule is grounded in provisions of the 2014 Farm Bill, a law that is now over a decade old. Previous attempts to implement similar "breadth of stock" and "variety" requirements have been withdrawn due to negative public response categorizing the changes as "arbitrary and confusing,"⁵ and this proposed rule does nothing to address those worries. In the decade since these changes were authorized in statute, the Special Supplemental Nutrition Assistance Program for Woman, Infants, and Children (WIC) has made changes to food stocking standards for retailers, and many stores — faced with new standards and other

¹ <https://www.brookings.edu/articles/snap-cuts-in-the-one-big-beautiful-bill-act-will-significantly-impair-recession-response/>

² <https://www.npr.org/2025/10/30/nx-s1-5587926/snap-food-aid-wic-shutdown-grocery-stores-walmart>

³ <https://www.axios.com/2025/10/31/shutdown-snap-trump-food-stamps-usda>

⁴ <https://www.politico.com/news/2025/11/20/trump-rollins-snap-benefits-reapplication-00661001>

⁵ <https://www.regulations.gov/document/FNS-2025-0018-0001>

complicating factors — have left the program. For example, in the five-year period between 2019 and 2024, the state of Louisiana lost 68 WIC vendors, mostly in rural areas.⁶

At a time when food costs are a primary concern for all Americans, including but not limited to SNAP beneficiaries, the program cannot afford to lose retailers due to ill-timed and unreasoned program changes. As an additional component of the poor timing of this proposed rule, the NPRM's own background discussion references the Dietary Guidelines for Americans, although the 2025 update to those guidelines has not yet been published. And finally, the opportunity for comment on these ill-considered changes has not been extended despite the bulk of the period occurring during the longest federal government shutdown in American history — a shutdown that posed unprecedented risks to SNAP.

The harm of these changes is not hypothetical and will fall disproportionately on the vulnerable populations whose food security is at the heart of MAZON's mission. As such, MAZON strongly urges FNS to reconsider adding additional and unnecessary obligations to the American businesses who serve as a vital pillar of SNAP. MAZON urges FNS to focus on supporting retailer participation rather than erecting barriers that could jeopardize food assistance for hungry families. MAZON is available to discuss these recommendations further. If you have any questions, please contact Sarah Pratter, Director of Legal Advocacy, at spratter@mazon.org.

Sincerely,

Abby J. Leibman
President & CEO
MAZON: A Jewish Response to Hunger

⁶ <https://www.myjournalcourier.com/news/article/finding-wic-allowable-food-isn-t-easy-18619139.php>