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Date: May 05, 2023
To: Phil Hayek
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Subject: Recommendation Report for FDA Response to Nutrition Crisis

Attached is the report for the research of "FDA Response to Nutrition Crisis." I have completed the tasks described in my proposal. If you have any questions or comments, do not hesitate to email me.

Abstract

“FDA Response to the Nutrition Crisis Recommendation Report”

On April 1st, 2023, Phil Hayek, Professor at UIC, approved a proposal by Lee Wagner, Professional Writing Student at UIC, to conduct research on the nutrition crisis and report his findings. The author began by acquiring a basic understanding of the nutrition crisis. Then he determined the FDA’s knowledge and handling of the situation. Next he determined possible FDA interventions. Then he established criteria for crisis responses. Next he assessed different responses based on the criteria. Finally he prepared the recommendation report. Chronic illness plagues Americans due to the nutrition crisis. The FDA is charged with the task of keeping America’s food supply safe. Yet it struggles with the Human Food Program. I recommend that the FDA considers acquiring more funding and utilizing all of its current powers.

FDA Response to the Nutrition Crisis Recommendation Report

Prepared for: Dr. Phil Hayek

Prepared by: Lee Wagner

May 5, 2023



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Executive Summary

Currently Americans suffer from various chronic diseases that are preventable. By researching through other organization assessments of the FDA as well as the FDA's own initiatives a solution can be found. Currently the FDA struggles to fulfill its task of keeping American food safe. I wanted to determine the best way for the FDA to change this.

To determine the best way forward, I researched various government entities that were responsible for America's health and then compiled a report.

MY main finding was that the FDA is powerful enough to take legal battles against large industries, but that for the Human Foods Program, such funds and staffing are lacking. The FDA has a lot of regulatory power, but ultimately it has a soft approach when it comes to food. Warning letters are the primary disciplinary that the FDA takes for companies.

I recommend that the FDA should focus on acquiring more money and dedicating it towards increasing the size of its staffing for CFSAN and campaigns that focus on unhealthy foods. As well as using stricter measures such as mandatory guidelines instead of voluntary guidelines.

Introduction

America's current food supply is filled with unhealthy food. Currently half of Americans have a diet related disease. The FDA is responsible for the safety of 80% of the US food supply. Since the 1980's, there have been dietary guidelines from the USDA available to the public and designed for policymakers in order to help Americans meet their nutritional needs, but yet we are in a nutritional crisis. I propose to research organizations that regulate nutrition and scientific research on American food.

According to the CDC, Of the top ten causes of death, 8 are noncommunicable diseases. Non-communicable diseases are chronic and usually come about due to lifestyle choices or birth. These include: cancer, kidney disease, heart disease, liver disease, stroke, diabetes, and respiratory disease. In this age, most of these diseases can be traced back to diet. According to the CDC, 9 in 10 Americans consume too much salt. Too much sodium increases the risk for high blood pressure, heart disease, and stroke. Being overweight leads to an increased risk of diabetes. An unhealthy diet and obesity are likely to cause cancer. Poor nutrition is detrimental to the health of Americans. The pre-packaged, super-processed, oversaturated foods that Americans consume daily have led to 42% of Americans being obese. Almost half of the population is at risk. Not only are the everyday foods Americans eat oversaturated, there is little done to prevent Americans from over consuming. Many chronic health conditions are preventable, but still they continue to plague Americans.

Methods

I began my research focusing on the contaminants in American diets. The goal being to help Americans eat safer. However, regardless of contaminants, According to the CDC, Americans faced dire consequences for their diets. With a 42% obesity rate that's increasing, the amount of illness due to errors in food safety, was eclipsed by the amount of disease due to diet choices. Certifying that American diets and food supply are currently dangerous even without regards to food safety. So the lack of nutrition in American diets became the focus of the report.

I started with the FDA since they regulate a majority of the food supply. I discovered a Politico investigation into the FDA and its failures. After reading it, I decided to break the project into steps. The following are the steps of action.

Step 1: Acquire a basic understanding of nutrition crisis

Step 2: Determine FDA's knowledge and handling of the situation.

Step 3: Determine possible FDA interventions.

Step 4: Establish criteria for crisis responses.

Step 5: Assess different responses based on my criteria

Step 6: Prepare the recommendation report.

Step 1: Acquire a basic understanding of nutrition crisis

The FDA is responsible for the food supply, so it was logical to start on their website. Finding that Americans were not meeting the recommendations and in some cases recommendations set by FDA did not match dietary recommendations, I decided to research what could be wrong.

Step 2: Determine FDA's knowledge and handling of the situation.

I combed through the FDA's database in order to understand what steps they have been taking in order to deal with the situation. I read through reports of the

Step 3: Determine possible FDA interventions.

I filed through the FDA's Compliance and Enforcement section of their website. I reviewed the different systems they have in place for food safety. After reviewing inside sources I tried outside sources. I reviewed an evaluation of the FDA and an investigation. These provided more background and thorough reviews of operations that the FDA is doing correctly and incorrectly. Since the FDA devotes a majority of its resources to its drug department, I reviewed past actions taken by them to address popular items that caused health crises in America. Cigarettes and alcohol were both items that were combatted heavily by the FDA, so my focus was there.

Step 4: Establish criteria for crisis responses.

I establish criteria for solutions in order to determine what would be an appropriate way to respond to the crisis for the FDA. These criteria were centered around feasibility and legality.

Step 5: Assess different responses based on my criteria

In order to come up with a good solution, all possible solutions were written and then eliminated based on their inability to meet the criteria proposed.

Step 6: Prepare the recommendation report.**Results**

Step 1: Acquire a basic understanding of nutrition crisis

A dietary pattern is the combination of food and beverages a person consumes over time. Diet and health are linked. There is decades of evidence proving so. Evidence shows that a healthy diet pattern can prevent chronic diseases no matter what age you are. However, many struggle with poor diets.

The USDA and HHS work with other Federal organizations to create dietary guidelines based on past and current scientific research. According to the USDA, more than half of Americans currently have a chronic disease. 70% of adults are overweight or obese while 43% of adults are obese. In the US, heart disease is the leading cause of death. Hypertension and high cholesterol are major risk factors for heart disease. 45% of adults have hypertension. 11% of adults have diabetes and 35% have prediabetes. 90% of adults with diabetes are overweight or obese.

Stroke, gallbladder disease, diabetes, osteoarthritis, sleep apnea, depression, anxiety, body pain, breathing problems, and 13 types of cancers are linked to obesity.

Many people in the US eat foods that cause them a caloric imbalance. Americans are often overweight and malnourished. Life expectancy has gone up over time until recently. Now it has started to go down.

Step 2: Determine FDA Role and Response

The FDA is an agency within the United States Department of Human Health and Services(HHS). They oversee tobacco, medical products, products that give off radiation, cosmetics, dietary supplements, as well food. When it comes to food, the FDA's Center for Food Safety and Applied Nutrition(CFSAN), is responsible for the safety of a majority of the food supply. The only food they do not regulate is poultry, processed eggs, and most meat. They must assure that food is safe and properly labeled. They monitor the food supply for chemicals and make certain chemicals do not reach unsafe levels. They evaluate food ingredients, packaging, substances that come into contact with food, and methods of storage and handling. When companies do things that may jeopardize public health their responsibility is to intervene. They usually do this by warning letters and recalls. Other actions may include seizures, injunctions, and prosecutions.

The FDA has struggled to effectively regulate food. A politico investigation, outside agency evaluations, and Congress have determined that the FDA has dropped the ball when it comes to food.

It is limited in money. Changes such as getting user fees from companies that go to them for regulation and approval has increased their budget. This is only for the drug portion of the FDA. The CFSAN budget is quite limited.

Step 3: Determine Possible FDA Interventions

In 1964, the Surgeon General's report on tobacco concluded smoking to be harmful. Dozens of studies over the decades made it thoroughly clear there were many other dangers associated with it, most threateningly cancer. The FDA has been fighting against the tobacco industry for decades. In 2009, they were finally granted the power to regulate tobacco products as drugs. Tobacco and smoking were determined to be public health threats in.

IN 2014, the FDA started "The Real Cost" campaign. This was a prevention campaign that targeted teens through commercials, online video ads, social media, websites, posters in high schools nationwide, and tv show partnerships, such as with Marvel Comics and Rick and Morty. 90% of the target audience were aware of the campaign within one year. They spent 250 million in the first 2 years and prevented 587,000 teens from smoking.

The FDA is actively working to establish standards for tobacco that make smoking products less addictive, less appealing, and less deadly. Over the last decade adult smoking has fallen from 21% to 14%. Their war against products detrimental to public health has been quite effective.

Step 4 : Establish Criteria for the Crisis Response

The criteria for the response were built upon historical precedence, legality, affordability, and feasibility.

The response needed to address the health crisis by:

- Reduce the amount of unhealthy foods Americans eat.
- Be within the legal powers of the FDA.
- Be within the budget of the FDA.

Step 5: Assess different responses based on criteria.

Potential Response:

In order to combat the nutrition crisis the FDA could start a campaign similar to the campaigns against tobacco products they have launched. They could work towards making unhealthy food less appealing, less addictive, and less deadly.

Assessment:

This would likely reduce the amount of unhealthy foods and be within the legal powers of the FDA. However, the FDA currently seeks to spend 900 million on tobacco campaigns. The budget would have to shift and dedicate a massive amount towards food.

Potential Response 2:

Increase amount of regulation on food. They could use more serious methods of their current power instead of warning letters. More seizures, suspensions, detentions. As well as using powers more in less severe situations. Use strict policies. Mandatory instead of voluntary amounts when it comes to added sugars and sodium.

Step 6:

I prepared the recommendation report.

Conclusion

I have concluded that the most effective way to defeat the nutrition crisis is to get Americans to follow a healthy dietary pattern. Consume less foods and beverages higher in added sugars, sodium, calories, and saturated fats. Consume more vitamin D, calcium, potassium, and fiber. Drink less alcohol. Changing the dietary plans of Americans to a healthy pattern will be difficult, but highlighting the dangers of unhealthy diets in a mass campaign similar to the FDA's "The Real Cost" campaign would be the most effective route. However, the money to do so is not likely to come. Most government enforcement and energy is focused on markets that make the most money such as drugs. The Food Program will likely not receive much funding. However, CFSAN is not properly utilizing its current resources. The best solution would be to focus on building up the FDA's CFSAN.

Recommendations

Option 1:

In order to effectively work on the nutrition crisis, the FDA needs more funds, more staff, and more power. At this time the FDA should focus on acquiring more money and dedicating it towards:

- Increasing the size of its staffing for CFSAN.
- Campaigns that focus on unhealthy foods.

Option 2:

The FDA currently has a lot of power that is not used. Using stricter measures to ensure public safety and being unafraid to start a battle with food companies would be feasible.

Stricter measures would include:

- Mandatory guidelines instead of voluntary.
- Guidelines that fit what science says is healthy and not what the public currently eats.
- Shorter deadlines to meet requirements.
- Curtailing the use of marketing to get people to eat unhealthy foods.

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