

October 10, 2025

The Honorable Brooke Rollins
Secretary
United States Department of Agriculture (USDA)
1400 Independence Ave, SW
Washington, DC 20250

To the Honorable Secretary of Agriculture,

On behalf of the National Grocers Association and the National Association of Convenience Stores, we respectfully submit this joint letter requesting a delay and standardization in the implementation of state Supplemental Nutrition Assistance Program (SNAP) restriction waivers. Although states may avail themselves of federal waivers to exclude certain food products from SNAP eligibility, it has become unnecessarily complicated to allow each state to approach this issue slightly differently than one another.

Perpetuating this current state of affairs will increase costs for food retailers and ultimately their customers. This can be avoided if the various states' SNAP restriction waivers were harmonized to exclude the same list of products as one another. Given that the USDA holds the federal authority by law to approve state waivers that restrict SNAP purchases and issue other nutrition standards, we ask that you use this power to ensure SNAP remains efficient and effective.

Since the first state restriction waiver was approved in May, we have worked diligently with our membership to navigate the challenging implementation process for each waiver. Given the complexity of today's food supply chain, it has been nearly impossible to determine what foods or beverages are restricted in each state. Despite bringing in experts and specialists to assist in identifying eligible and noneligible products, the process has yielded more questions than solutions. We are seeking USDA's leadership in this process to ensure predictability, clarity, and fairness for all SNAP authorized stores.

Recent analysis underscores the severe economic burden these types of restrictions would impose on retailers of all formats.¹ The study estimates that proposed SNAP product restrictions would create a combined up-front cost of approximately \$1.6 billion across the food retail industry, with convenience stores bearing the largest share at \$1.0 billion, followed by supermarkets at \$305.1 million, supercenters at \$215.5 million, and small-format grocery stores at \$11.8 million. In addition, ongoing annual costs are projected at nearly \$759.1 million: \$378.6 million for convenience stores, \$281.4 million for supermarkets, \$81.1 million for supercenters, and \$18.0 million for small-format grocers. Taken together, these costs would reduce industry net income by nearly 2% in 2024, representing a significant and recurring financial strain on businesses already operating under narrow margins.

To ensure a workable solution for customers, SNAP retailers, manufacturers, and communities, we ask the USDA to promulgate a regulation with notice and public comment to establish definitions of specific foods and beverages that states can use if they choose to apply for a restriction waiver. Once definitions are created, we ask the USDA to create and maintain a list of products by universal product

¹ Timothy J. Richards, *SNAP Restrictions Impact Analysis: Report*, September 1, 2025, available at: <https://www.nationalgrocers.org/wp-content/uploads/2025/09/SNAP-Reform-Impact-Report-Final.pdf>.



code (UPC) that will be banned under approved waivers. We also ask USDA to require that states use the USDA definitions and parameters when requesting and implementing SNAP restriction waivers. To minimize upward pressure on retail food prices, waivers should not be permitted to take effect until this process has concluded.

We appreciate your attention to this matter and stand ready to participate in stakeholder consultations and provide further input as the process moves forward. Ensuring efficiency for SNAP participants and operational consistency is good for taxpayers and America.

Thank you for your consideration.

Respectfully,

National Grocers Association
National Association of Convenience Stores
NATSO, Representing America's Travel Centers and Truck Stops
SIGMA: America's Leading Fuel Marketers