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Department of Agriculture, Food and Nutrition Service

[Docket No. FDA-2025-0018]

Via Regulations.gov

**UPDATED STAPLE FOOD STOCKING STANDARDS FOR RETAILERS IN THE SUPPLEMENTAL
NUTRITION ASSISTANCE PROGRAM**

The National Automatic Merchandising Association (NAMA) appreciates the opportunity to comment on the U.S. Department of Agriculture Food and Nutrition Service (FNS) request for information, “Updated Staple Food Stocking Standards for Retailers in the Supplemental Nutrition Assistance Program” (Docket No. FNS-2025-0018).¹ NAMA represents the \$40 billion U.S. convenience services industry, including owners/operators of micro-markets, office coffee and pantry services, vending machines and food and beverage suppliers. NAMA and its members are deeply invested in promoting access to nutrition for consumers. Launched in collaboration with the Partnership for a Healthier America, in 2019 the industry committed to increasing the availability of ‘better-for-you’ eating and drinking options in vending by 40 percent.² NAMA’s members are dedicated to providing convenient, affordable, and nutritious food choices that meet the needs of more than 40 million American consumers each day—whether at work, at home, or on the go. While the convenience services industry offers consumers choices, it is also a key player in closing nutrition gaps—providing reliable access to nutrients across food deserts and low-income communities.

NAMA supports FNS’s priority of providing Supplemental Nutrition Assistance Program (SNAP) beneficiaries with a greater variety of nutritious foods and retailers with strict oversight requirements to prevent fraud. However, the Updated Staple Food Stocking Standards for Retailers (Proposed Stocking Requirements) as written will limit the ability of small format retailers to accept SNAP as a form of payment at locations accessible to working SNAP beneficiaries.

In 2024, NAMA polling of SNAP beneficiaries found that roughly a quarter of respondents lack access to a grocery store or have difficulty using their benefits because of work schedules and time constraints; nearly all SNAP beneficiaries desired increased flexibility regarding where their

¹ Food and Nutrition Service (FNS), U.S. Department of Agriculture, “Updated Staple Food Stocking Standards for Retailers in the Supplemental Nutrition Assistance Program,” Proposed Rule, 90 Fed. Reg. 46,081 (Sept. 25, 2025) (Docket No. FNS-2025-0018), available at <https://www.regulations.gov/document/FNS-2025-0018-0001>

² National Automatic Merchandising Association. (2019). Public health commitment. Retrieved October 23, 2025, from <https://namanow.org/convenience-services/public-health-commitment/>

benefits could be utilized. Both Americans without a nearby grocery store, and those with work-related time constraints are reliant on small format retailers to use their benefits.

For many households, time and budget drive nutrition; extended working hours, long commutes, and income limit frequent grocery store trips. The convenience services industry meets these consumers where they are, providing individuals and families dependable access to affordable and nutritious food and beverage choices in locations like rural worksites, manufacturing facilities, and large campus environments. Many convenience services businesses operate small format retail locations called micro markets—grab and go food and beverage stores, commonly located in workplaces. Micro markets provide crucial access to nutrition for working Americans by locating affordable food and beverage options at their place of employment. Workplace access is particularly critical for rural Americans, who are both more likely to use SNAP benefits and to live and/or work far from a grocery store.³ Meeting these consumers at their place of employment is critical for SNAP recipients who may otherwise be unable to utilize their benefits as a result of limited time, grocery store locations, or transportation means.

The Proposed Stocking Requirements would likely disqualify any micro markets currently within the program and prevent future small format retailers from providing SNAP compliant food and beverages to working Americans. Removing these providers would strip access to reliable sources of nutrition for many rural and working Americans. Preserving a path for small format retailers to accept SNAP benefits is fundamental to protecting American public health.

NAMA believes that USDA FNS can modify the definition of “variety” to increase the number of food items that count as acceptable staple food varieties while tightening the rigor of stocking standards to prevent fraud, without excluding small format retailers. We urge FNS to prioritize increasing nutrition and reducing fraud within the SNAP program, without harming the ability of recipients to use their benefits.

³ U.S. Department of Agriculture, Economic Research Service. “Food Access Research Atlas.” *Food Access Research Atlas – Go to the Atlas* (interactive mapping tool), updated February 20, 2025, available at <https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas>

Thank you for considering the National Automatic Merchandising Association's feedback. As the voice of the convenience services industry, NAMA is committed to being a constructive partner in efforts to improve public health through increasing consumer access to nutrition. Please do not hesitate to reach out to ljanes@namanow.org with any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. H. Meierling", is positioned above a thin horizontal line.

Bill Meierling

Senior Vice President, External Affairs

National Automatic Merchandising Association