A Year of MAHA: The 2025 Road to Food Policy Reform

OVERVIEW

The Make America Healthy Again (MAHA) movement took 2025 by storm. Over the past year, MAHA moved less like a traditional policy initiative and more like a fast-moving vehicle, speeding across the road to wide-ranging food system reform. It accelerated quickly, changed lanes often, and touched nearly every corner of the food policy landscape in a single year. What began with early regulatory signals and confirmation hearings rapidly expanded into executive orders, agency restructuring, ingredient bans, a patchwork of state regulation in red and blue states alike, Food Restriction waivers, industry pledges, and sweeping strategic documents.

MAHA has followed no single legislative or regulatory path, instead advancing simultaneously at the federal, state, and market levels. Federal agencies are recalibrating regulatory processes while states are acting as laboratories for SNAP restrictions, labeling requirements, and food technology bans. Industry is responding not only to formal rules, but to the direction of MAHA's travel itself, adjusting practices in anticipation of where policy momentum appears to be heading. The result is a 2025 marked by speed, breadth, and experimentation. Now at the year's end, MAHA had established a clear trajectory away from incremental change and toward a more assertive, decentralized, and visibly interventionist approach to food policy. This memo traces that road mile by mile, marking the key turns, forks, and accelerations that defined MAHA's first year—and previewing where this fast-moving vehicle may head next.

JANUARY - EARLY REGULATORY SIGNALS

Before Secretary Robert F. Kennedy Jr., the leader of the MAHA movement, had formally taken office, the Food and Drug Administration (FDA) revoked authorization for Red Dye No. 3 on January 15, 2025. The move marked one of the earliest concrete regulatory actions aligned with MAHA's emerging emphasis on ingredient safety and consumer health, signaling a shift in federal posture even before new leadership was fully in place.

Later in January, Secretary Kennedy appeared before the Senate Finance Committee and the Senate Health, Education, Labor, and Pensions Committee for his confirmation hearings. As the process unfolded, it became clear he was among President Trump's most embattled nominees, drawing bipartisan concern over his views on vaccination policy. Although both committees ultimately voted along party lines to advance his nomination to lead the Department of Health and Human Services to the full Senate, the contentious hearings left many in the food policy

community uncertain whether Secretary Kennedy's broader vision for food system reform would attract sustained support from congressional leaders and other key stakeholders.

At the same time, Brooke Rollins appeared for her confirmation hearing to serve as Secretary of Agriculture. Early on, there was considerable uncertainty about how she would approach agriculture and nutrition policy, making it difficult to predict the direction the U.S. Department of Agriculture (USDA) would take under her leadership.This uncertainty carried particular weight, as many of the reforms envisioned by Secretary Kennedy would require close coordination with USDA. During her hearing, Rollins offered early signals of alignment with MAHA priorities, emphasizing a focus on improving children's nutrition by reducing ultra-processed foods (UPFs) in school meal programs and underscoring the need to ensure that Supplemental Nutrition Assistance Program (SNAP) dollars support the purchase of healthier foods.

Food regulation, chronic disease, and public health were not featured prominently in the first Trump administration's agenda, but Secretary Rollins made it clear these issues would be elevated. Any lingering skepticism about the seriousness or durability of the MAHA agenda faded quickly, as it became increasingly evident the movement was not only viable, but poised to play a central role in shaping federal food and nutrition policy.

On January 31, Executive Order 14192 was issued, requiring that for every new federal regulation introduced, at least 10 existing regulations must be repealed. This order establishes an aggressive deregulatory framework that later shaped MAHA-related agency actions.

FEBRUARY - EXECUTIVE AUTHORITY SECURED

RFK Jr. was confirmed by the Senate and swiftly sworn in as HHS Secretary, a political moment that some considered improbable just a few months earlier. Grassroots advocacy from the so-called "MAHA moms" resulted in a surge of calls and messages to Senate offices, translating into tangible political pressure on Capitol Hill. Secretary Kennedy was ultimately confirmed by a 52–48 vote largely along party lines, with Sen. Mitch McConnell (R-Ky.), a polio survivor, casting the lone Republican vote against his nomination.

Agriculture Secretary Brooke Rollins was also confirmed and sworn in during the same period, though by a significantly wider margin that included several Democratic votes. With both Cabinet officials in place, the Administration moved quickly to formalize the MAHA agenda. President Trump established the Make America Healthy Again Commission by executive order, charging its members with examining the root causes of chronic disease with an initial focus on childhood health. The order required the Commission to deliver an assessment within 100 days summarizing existing evidence, unresolved questions, and international comparisons related to childhood chronic disease. Within 180 days, the Commission was directed to produce a comprehensive strategy to improve children's health outcomes.

Just three days before Kennedy and Rollins were confirmed, the public comment period closed on the Scientific Report of the 2025–2030 Dietary Guidelines for Americans (DGAs). Under the MAHA framework, the DGAs process came under heightened scrutiny. Shortly thereafter, HHS and USDA announced plans to conduct a line-by-line review of the advisory committee's report. Secretary Kennedy signaled a forthcoming overhaul of the DGAs, emphasizing a renewed focus on whole, minimally processed foods and indicating long-standing recommendations on saturated fats could be revisited.

Leadership changes at FDA followed almost immediately. Within days of Secretary Kennedy's confirmation, Jim Jones, the FDA's deputy commissioner for human foods, resigned after the Administration dismissed thousands of probationary federal employees. Kyle Diamantas was appointed acting deputy commissioner for human foods. Though relatively unknown within Washington's food policy circles, Diamantas was publicly described by prominent MAHA advocates as closely aligned with Secretary Kennedy and Dr. Mary Makary, who would later be confirmed as FDA Commissioner.

At the state level, momentum accelerated in parallel. MAHA-aligned legislation advanced rapidly through legislatures across the country, often drawing bipartisan support. These bills targeted a wide range of food policy issues, including restrictions on SNAP-eligible purchases, bans on certain additives and synthetic dyes, limits on ultra-processed foods in school meals, and broader efforts to reshape state-level nutrition and food safety standards.

MARCH - ADMINISTRATIVE RESTRUCTURING

Dr. Marty Makary, President Trump's nominee for FDA Commissioner, appeared before the Senate for his confirmation hearing and was subsequently confirmed. Among recent FDA nominees, Dr. Makary, a surgeon by trade, brought an unusually extensive record on food and nutrition policy. During his hearings, he pledged to take action on food additives and expressed strong support for reforming school meal programs. At the same time, significant layoffs and leadership departures continued across HHS, USDA and related agencies, reinforcing the sense of rapid institutional change under the MAHA agenda.

Engagement with the food industry followed quickly. A group of senior food industry executives met with Secretary Kennedy on March 10, representing companies including Kraft Heinz, General Mills, Tyson Foods, WK Kellogg Co., J.M. Smucker Co., PepsiCo, and the Consumer Brands Association. During the meeting, Secretary Kennedy made clear that the Administration expects synthetic food dyes to be removed from the food supply before the end of his tenure. That same day, Secretary Kennedy directed Acting FDA Commissioner Sara Brenner, M.D., M.P.H to explore potential rulemaking to revise the agency's Substances Generally Recognized as Safe (GRAS) Final Rule and related guidance with the goal of eliminating the self-affirmed GRAS pathway.

Around this time, the MAHA Commission convened its first official meeting. Immediately following the meeting, members of the "MAHA moms" group participated in a White House roundtable moderated by Secretary Kennedy. The discussion was organized around four primary themes: nutrition, physical activity, over-medicalization and standards of care, and environmental impacts on health.

Momentum at the state level continued to build. West Virginia enacted the first MAHA-aligned law, prohibiting seven specified food dyes from use in school nutrition programs beginning August 1, 2025. The legislation also requires that, beginning January 1, 2028, those dyes—as well as butylated hydroxyanisole (BHA) and propylparaben—be excluded from food and drug products sold in the state. The bill passed with broad bipartisan support in both chambers of the legislature. Similar MAHA-aligned proposals continued to advance in statehouses across the country.

Also in March, HHS modified its internal procedures governing notice-and-comment rulemaking, signaling a shift in how the department intends to develop, revise, and implement regulations moving forward.

APRIL - NUTRITION, INGREDIENT AND DYE POLICY SHIFTS

Secretary Rollins and Secretary Kennedy soon appeared together publicly, signaling a coordinated approach to nutrition policy and promising a major revision of the Dietary Guidelines for Americans (DGAs). They committed to producing a simplified, more accessible document that would clearly articulate what constitutes "good nutrition" and what foods Americans and their children should eat. Secretary Rollins further indicated that USDA would begin encouraging states to experiment with new approaches to improve school meal programs and reinforce the Administration's interest in state-led innovation.

Secretary Kennedy then embarked on a MAHA Tour across the southwestern United States, promoting a range of initiatives aligned with MAHA priorities. During the tour, he praised Utah's new law banning fluoride in public drinking water, highlighted state efforts to seek SNAP food restriction waivers, supported bans on ultra-processed foods in school meals, and promoted new nutrition education programs for medical students. He also appeared in Indiana, while Secretary Rollins made a stop in Arkansas, with both visits drawing attention to each state's request for SNAP waivers that would prohibit the purchase of sugary drinks and candy using SNAP benefits.

HHS and FDA announced a plan to phase out petroleum-based synthetic dyes from the U.S. food supply by the end of 2026. The agencies framed the effort as a public-health-driven transition and requested voluntary compliance from industry rather than imposing immediate mandates. In parallel, FDA announced it was initiating the process to revoke authorization for two synthetic food dyes: Citrus Red No. 2 and Orange B. During this period, Dr. Makary signaled a broader reevaluation of prior federal nutrition frameworks by publicly criticizing the existing

DGAs, issued under the first Trump Administration, the Dietary Guidelines Committee report and the Biden FDA issued front-of-pack food labeling proposal.

MAY - THE BIG ASSESSMENT AND THE FIRST WAIVE

Secretary Kennedy announced "major, dramatic" changes were coming to the national school lunch program. While HHS and USDA are statutorily required to release the DGAs by December 31, Kennedy indicated the agencies were moving quickly to complete the guidelines by the end of summer with the explicit goal of enabling changes to school meal programs ahead of the 2025–2026 school year.

Around the same time, President Trump nominated wellness entrepreneur and physician Casey Means to serve as Surgeon General. Means is widely known as the co-founder of Levels, a technology company focused on continuous glucose monitoring, and as the co-author of Good Energy, a New York Times best-seller on metabolic health that helped energize the MAHA movement. The book was co-authored with her brother, Calley Means, who was serving as a White House advisor, special government employee, and is currently a senior advisor to Secretary Kennedy at HHS. A Stanford-trained physician who left clinical practice after becoming disillusioned with the U.S. healthcare system, Means was already a prominent voice within MAHA. Her nomination was controversial but widely viewed as emblematic of the movement's skepticism toward traditional health institutions and its emphasis on metabolic health.

Federal research priorities also began to shift. The FDA and the National Institutes of Health (NIH) jointly announced the creation of the "Nutrition Regulatory Science Program," modeled on the Tobacco Regulatory Science Program. The initiative aims to accelerate a coordinated nutrition research agenda to inform future food and nutrition policy with a focus on the health impacts of ultra-processed foods, the metabolic effects of certain food additives, and the influence of maternal and infant dietary exposures on health outcomes across the lifespan.

The MAHA Commission released its first required installment: The MAHA Report: Make Our Children Healthy Again Assessment. The report attributed rising rates of childhood chronic disease to factors including ultra-processed foods, environmental exposures, sedentary behavior, and systemic incentives embedded within the food and healthcare systems. Major agricultural organizations responded almost immediately with a joint statement urging the Administration to consider the potential consequences of the report's findings before they were finalized.

At the state level, food policy activity continued to accelerate.The Texas legislature passed SB 25, requiring a high-contrast warning label on food products containing any of 44 specified additives. The label will state: "WARNING: This product contains an ingredient that is not recommended for human consumption by the appropriate authority in Australia, Canada, the European Union, or the United Kingdom."

Momentum around SNAP policy also intensified. Nebraska became the first ever state to receive a SNAP Food Restriction Waiver, restricting the purchase of soda and energy drinks. Indiana and Iowa follow closely behind. Indiana's waiver excludes soft drinks and candy. The waiver for Iowa excludes any food item eligible for sales tax including sweetened beverages, snacks, and candy. They are all set to take effect January 1, 2026.

States have long had the authority to request waivers allowing restrictions on SNAP purchases, but such efforts had historically failed to gain federal approval. Previous Administrations, both Republican and Democratic, rejected the concept, most notably when New York sought to prohibit sugar-sweetened beverages from SNAP eligibility purchases in 2010. That precedent shifted decisively in May, as a combination of visible political pressure in Washington and broad support across state legislatures reshaped the federal posture toward SNAP waivers, opening the door to a new era of nutrition-directed benefit policy.

JUNE - MOMENTUM AND MEETINGS

Secretary Rollins signed three additional SNAP food restriction waivers for Arkansas, Idaho, and Utah, each scheduled to take effect in 2026. Arkansas's waiver excludes soda, low- and no-calorie soda, fruit and vegetable drinks containing less than 50 percent juice, other beverages deemed unhealthy, and candy. Idaho's waiver restricts the purchase of soda and candy, while Utah's waiver excludes soft drinks.

At the same time, the White House began meeting with food and agriculture industry groups in the wake of the MAHA Commission's assessment amid concerns from some stakeholders that they had been excluded from the report's development. These discussions unfolded as reconciliation negotiations and broader debates over potential changes to SNAP policy continued to loom over lawmakers in Washington.

Secretary Rollins and Secretary Kennedy also indicated the DGAs would be released within the next 1-2 months, stating the revised guidelines would prioritize whole, nutritious foods—such as dairy, fruits, vegetables, and meats—while recommending limits on foods considered unhealthy.

Industry responses continued to accelerate. Kraft Heinz Co. announced it would remove synthetic food dyes from all of its U.S. products by the end of 2027, eliminating ingredients such as Red 40 and Yellow 5 from brands including Jell-O, Kool-Aid, and certain Lunchables products. The commitment positioned Kraft Heinz as the largest U.S. packaged food company to fully pledge the removal of artificial colorants, following similar moves by several other manufacturers.

JULY - FEDERAL PRIORITIES EMERGE

On July 4, President Trump signed the One Big Beautiful Bill Act of 2025 into law, marking a major reconciliation milestone with significant implications for food, nutrition, and health policy.

The legislation included multiple provisions affecting SNAP, including changes to eligibility rules, work requirements for able-bodied adults, benefit calculations tied to the Thrifty Food Plan, administrative cost sharing, and the eventual phaseout of mandatory SNAP-Ed funding.

That same period also underscored the breadth and internal tensions of the MAHA agenda. President Trump announced Coca-Cola would begin using cane sugar instead of high-fructose corn syrup in its U.S.-made soft drinks, at his urging. Despite earlier statements by Secretary Kennedy characterizing sugar as harmful, several prominent MAHA-aligned influencers framed the move as a positive step.

Meanwhile, FDA and USDA jointly released a Request for Information seeking data and input to support the development of a uniform federal definition of UPFs. The agencies emphasized a shared definition would promote consistency in research and policymaking and could serve as a foundation for future efforts to address health concerns associated with UPF consumption.

The long-anticipated release of the updated DGAs was delayed once again, with the Administration announcing a revised target of late October, extending uncertainty around how forthcoming federal nutrition recommendations would ultimately align with MAHA priorities.

AUGUST - SCHOOL FOOD, A NEW VOICE AND HEALTHY SNAP EXPANSION

West Virginia's HB 2354 took effect, banning seven specified food dyes from school food programs statewide and marking one of the first MAHA-aligned state laws to move from enactment to implementation.

August brought forth a citizen petition, filed by former FDA Commissioner David Kessler, who led the agency under Presidents George H.W. Bush and Bill Clinton and is best known for his role in confronting the tobacco industry. The petition sought to ban "processed refined carbohydrates" from the U.S. food supply. It argued that these ingredients, which are widely used in UPFs, are a primary driver of metabolic disease and remain on the market largely due to decades-old determinations that they are generally recognized as safe. Kessler contended current scientific evidence no longer supports those GRAS determinations and urged the Administration to reevaluate refined sweeteners, extruded flours and starches, and certain carbohydrate-additive combinations used in industrial food processing.

At the federal level, release of the MAHA Commission's second report was delayed as the White House worked to coordinate schedules. In the interim, early drafts of the report circulated publicly, and the Administration held meetings with industry stakeholders to preview its findings and recommendations.

Momentum around SNAP policy continued to build. Additional SNAP food-restriction waivers were approved for West Virginia, Florida, Colorado, Louisiana, Oklahoma, and Texas, further expanding the number of states implementing MAHA-aligned nutrition assistance policies.

Colorado's approval was particularly notable as it became the first Democratic-led state to adopt such restrictions.

SEPTEMBER - LABELING REQUIREMENTS AND THE STRATEGY

On September 1, Texas's Senate Bill 25 took effect, requiring warning labels on food products containing certain additives. Its implementation coincided with rising tensions between Secretary Kennedy and congressional leaders, particularly following actions taken at the Centers for Disease Control and Prevention (CDC), adding to broader unease on Capitol Hill over the Administration's approach to public health governance.

The MAHA Strategy Report was finally unveiled on September 9, outlining more than 120 initiatives spanning food systems, healthcare, research, and public awareness. The report prompted mixed reactions across the MAHA ecosystem. Compared with expectations set by earlier rhetoric and the Commission's initial assessment, the strategy was notably more restrained. Food and agriculture industry stakeholders expressed cautious optimism while segments of the MAHA base voiced disappointment. Several previously prominent MAHA targets—including sugar, high-fructose corn syrup, seed oils, and pesticides—were largely absent from the final document. The report did, however, signal the Administration's plan to consider revisions to the front-of-pack labeling rule originally proposed under the Biden Administration.

State-level momentum continued later in the month. On September 16, the California State Legislature passed Assembly Bill 1264, establishing a statutory definition of UPFs and requiring the removal of specified "UPFs of concern" from school meal programs by July 1, 2035. The measure passed with bipartisan support and awaited action by Governor Gavin Newsom. Secretary Kennedy had previously praised California's definition, prompting speculation within policy circles that a future federal definition could align closely with the state's framework.

The Administration announced the appointment of Ben Carson—a physician, former presidential candidate, and Secretary of Housing and Urban Development during the first Trump Administration—as National Advisor for Nutrition, Health, and Housing. The newly created role came with broadly defined responsibilities. The administration said Carson would advise President Trump and Secretary Rollins on nutrition policy, rural healthcare quality, and housing accessibility, and would participate in Secretary Rollins's work on the MAHA Commission.

Secretary Rollins predicted demand for beef, other proteins and whole milk would get a boost from the government's revamped DGAs, while also indicating the guidelines would be coming soon.

OCTOBER - GOVERNMENT SHUTDOWN AND INDUSTRY RESPONSE

As of October 1, the federal government entered a shutdown, placing the funding of federal nutrition programs in immediate uncertainty. The Special Supplemental Nutrition Program for

Women, Infants, and Children (WIC) was projected to run out of funding within weeks before the White House moved to temporarily fund the program twice using tariff revenue. SNAP funding proved more at risk and briefly lapsed when October appropriations expired. In response, two federal courts ordered USDA to draw on contingency funds to cover at least a portion of November SNAP benefits, rejecting the Administration's argument that the contingency fund is reserved for emergencies such as natural disasters and is not legally available during a government shutdown.

The first legal challenge to MAHA-aligned actions came to be. The International Association of Color Manufacturers (IACM) filed suit in federal court trying to strike down West Virginia's ban on synthetic food colors, arguing the law violates both the West Virginia and U.S. Constitutions. IACM contended the state law unlawfully encroaches on FDA authority over food safety, interferes with interstate commerce, and imposes economic harm without a substantiated or rational basis for deeming the covered products unsafe.

The public comment period closed on the Administration's request for information on developing a uniform definition of UPFs.

At the same time, industry efforts to shape the policy landscape accelerated. AFIT, a coalition advocating for a uniform national ingredient transparency standard, was launched. Major food manufacturers announced voluntary commitments to remove artificial colorings from certain products, reflecting growing private-sector adaptation to MAHA-driven policy pressure.

NOVEMBER - GOVERNMENT REOPENING AND THE MAHA SUMMIT

November began with USDA announcing it planned to use emergency funds to cover 50 percent of SNAP allotments for the month as the government shutdown continued to drag on. USDA also identified funds to extend WIC benefits through November.

Senator Roger Marshall, a Republican from Kansas and an early supporter of the MAHA movement, introduced the Better Food Disclosure Act, a proposal aimed at strengthening FDA oversight of food ingredients by effectively closing the GRAS pathway and requiring food companies to report ingredients in the U.S. food supply. The bill does not preempt state authority over food additives, a departure from long-standing industry priorities and a point of significant controversy as the bill was expected to include a federal preemption provision. Marshall said the decision to remove the provision reflected pressure from MAHA-aligned advocates who urged him not to curtail state-level action, even as industry groups warned of regulatory fragmentation. The bill, cosponsored by Senator Rick Scott (R-Fla.) and Senator Katie Britt (R-Ala.), drew endorsements from prominent MAHA figures and public-health experts alike, underscoring a growing alignment between grassroots advocacy and legislative efforts to recalibrate federal and state roles in food safety oversight.

The government reopened on November 12, ending the longest shutdown in history. While the government was reopening, Vice President J.D. Vance publicly embraced MAHA at the "MAHA Summit," a largely closed-door gathering of senior Administration officials, health industry executives, and MAHA-aligned advocates. The event, which featured Secretary Kennedy, Commissioner Makary, NIH Director Jay Bhattacharya, and other top officials, was widely interpreted as a signal that MAHA had become a central pillar of the Trump Administration's health agenda and a growing force within the broader Republican coalition.

Secretary Kennedy said the DGAs would be published the following month and it would stress the importance of protein and saturated fats—a recommendation in direct conflict with the most recent DGAC report and years of federal nutrition advice.

DECEMBER - LITIGATION, REGENERATIVE AG INITIATIVES AND MORE SNAP

December opened with a litany of litigation. San Francisco filed a lawsuit against 10 major food manufacturers, alleging the companies' production and marketing of UPFs contributed to a public health crisis. The suit asserts violations of California's Unfair Competition Law and public nuisance statutes and seeks injunctive relief, restitution, and civil penalties to address alleged health harms and associated public costs.

At the same time, the food industry mounted its own legal challenge to MAHA-aligned state policy. Four major trade associations filed a federal lawsuit challenging the warning-label provision of Texas Senate Bill 25. The plaintiffs argue the law's labeling requirement violates the First Amendment and is unconstitutionally vague. Furthermore, the plaintiffs allege the Texas law is preempted by federal food labeling statutes and FDA regulations and impermissibly burdens interstate commerce. Together, the two lawsuits underscored how courts were becoming a central battleground in the national debate over UPFs, ingredient transparency, and the scope of state authority in food regulation.

Secretary Rollins signed six additional SNAP Food Restriction Waivers for Hawaii, Missouri, North Dakota, South Carolina, Virginia, and Tennessee, bringing the total number of participating states to 18. On the same day, the Administration announced a $700 million regenerative agriculture pilot program designed to help American farmers adopt practices that improve soil health, enhance water quality, and strengthen long-term agricultural productivity, signaling a parallel push to align MAHA policy with on-farm reform.

The House of Representatives passed the Whole Milk for Healthy Kids Act after the Senate approved the measure by unanimous consent in November, sending the legislation to President Trump's desk. The Act requires schools to offer a broader range of fluid milk options, including flavored and unflavored organic or conventional whole, 2%, 1%, skim, and lactose-free milk. It exempts milk fat from saturated-fat limits in school meals, making it easier for nutrition directors to include whole and 2% milk. It also allows parents to request lactose-free or nutritionally equivalent non-dairy alternatives for their children.

THE ROAD AHEAD FOR MAHA

The DGAs will likely be the first big policy move for MAHA in 2026, as they are expected to be released in early January. The revisions to the DGAs and recent legislative action on school milk options lay the groundwork for Secretary Kennedy to drive the "major, dramatic changes" in school meal programs that have been a foundational element of the MAHA agenda. We expect to see greater emphasis on whole foods, animal-based proteins, and reduced reliance on ultra-processed items. It is likely a new round of state legislation will follow the release of the DGAs.

Overall, recent actions by Secretary Kennedy, Secretary Rollins, and the Trump Administration as a whole indicate the next era of MAHA will be driven largely by coordinated regulatory action across HHS and USDA, as opposed to sweeping federal legislation. At HHS, FDA's planned reform of the GRAS framework, now advancing through White House review, signals a decisive shift toward centralized, mandatory review of food substances. If finalized, the proposed rule is expected to significantly narrow the long-standing self-affirmed GRAS pathway and increase public transparency around ingredient safety, reinforcing MAHA's critique of UPFs and additive use without requiring congressional intervention. Developing a uniform definition of UPFs is proving difficult, leaving the possibility of a proposed definition hanging in the balance. FDA's agenda also points to continued movement on food labeling and standards, including the revocation or modernization of dozens of food standards of identity and targeted updates affecting dietary supplements and food traceability. The front-of-package nutrition labeling final rule is expected in May 2026, though it remains unclear whether the current Administration will adopt, revise, or substantially rework the Biden-era proposal. Collectively, these actions suggest a recalibration of regulatory oversight that prioritize consumer clarity and ingredient scrutiny while selectively easing or modernizing legacy requirements.

USDA's near-term regulatory focus appears centered on nutrition labeling alignment with FDA, operational changes within meat and poultry inspection systems, expanded farm-to-school access, and updates to bioengineered food disclosure and organic program rules. These actions align with MAHA's broader emphasis on "real food," transparency, and production practices, while avoiding more controversial interventions that could disrupt supply chains. SNAP Food Restriction Waivers will also likely continue with more states submitting waivers and awaiting approval. USDA is expected to release a proposed child nutrition rule shortly following the publication of the DGAs. The Administration's agenda has already previewed a rule that will propose a "wide range of changes to make it easier for operators to provide nutritious meals to children and adult participants."

Many times over the course of the last year, Secretary Kennedy and Secretary Rollins have touted "local" foods as being a MAHA solution and preference. There is also a rule pending regarding local food procurement and simplifying geographic preference in child nutrition

programs. It is expected this focus on local will translate into other federal nutrition programs and dietary advice.

MAHA's path forward will rely on incremental but consequential regulatory changes. Congress still has the opportunity to legislate, minimize challenges, and expand opportunities. However, outside of the introduction of a handful of MAHA-aligned bills, MAHA has been quiet at the federal legislative level. MAHA's legislative impact is more likely to continue in the states. To that end, it is also likely the food policy landscape will see more litigation unfold from all sides as food companies and manufacturers attempt to navigate the patchwork of regulation unfolding.

CONCLUSION

MAHA's first year has been defined by rapid action, broad experimentation, and a decentralized approach to food policy reform. From early regulatory signals to executive orders, state-level innovation, industry engagement, and litigation, the year 2025 established both the momentum and the framework for MAHA's ongoing influence. As the movement forges into 2026, its focus will likely remain on targeted regulatory initiatives, coordinated federal agency action, and state-led experimentation, all aimed at reshaping American diets, food systems, and public health outcomes. The road traveled in 2025 has established MAHA not only as a disruptor of legacy policy but as a persistent driver of change.