

Oh, SNAP!

What's Changing in SNAP and Why It Matters

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Roadmap

- Convenience Stores + SNAP
- How SNAP Is Being Reshaped
- SNAP Restriction Waivers
- USDA Enforcement & Timing
- 2025 SNAP Stocking Requirements Proposed Rule

C-Stores are Cornerstone of SNAP Access

- **118,317** SNAP authorized retail locations
- **93%** of Americans live within 10 minutes of a c-store
 - Including **86%** of rural Americans
- Accessible by **public transportation** or **walking**
- Open **24/7**
- Average c-store about **11 times smaller** than the average supermarket



SNAP is Being Reshaped in Trump 2.0



State SNAP restriction waivers limiting eligible products (“junk food”)



New waiver enforcement guidance with little retailer lead time



SNAP retailer stocking requirements proposed rule



Funding cuts + cost shift to states in “One Big Beautiful Bill” → shrinking program resources

Industry Threats = Loss of Food Access



**SNAP
Restriction
Waivers**



**2025 Stocking
Requirements
Proposed Rule**

SNAP Restriction Waivers



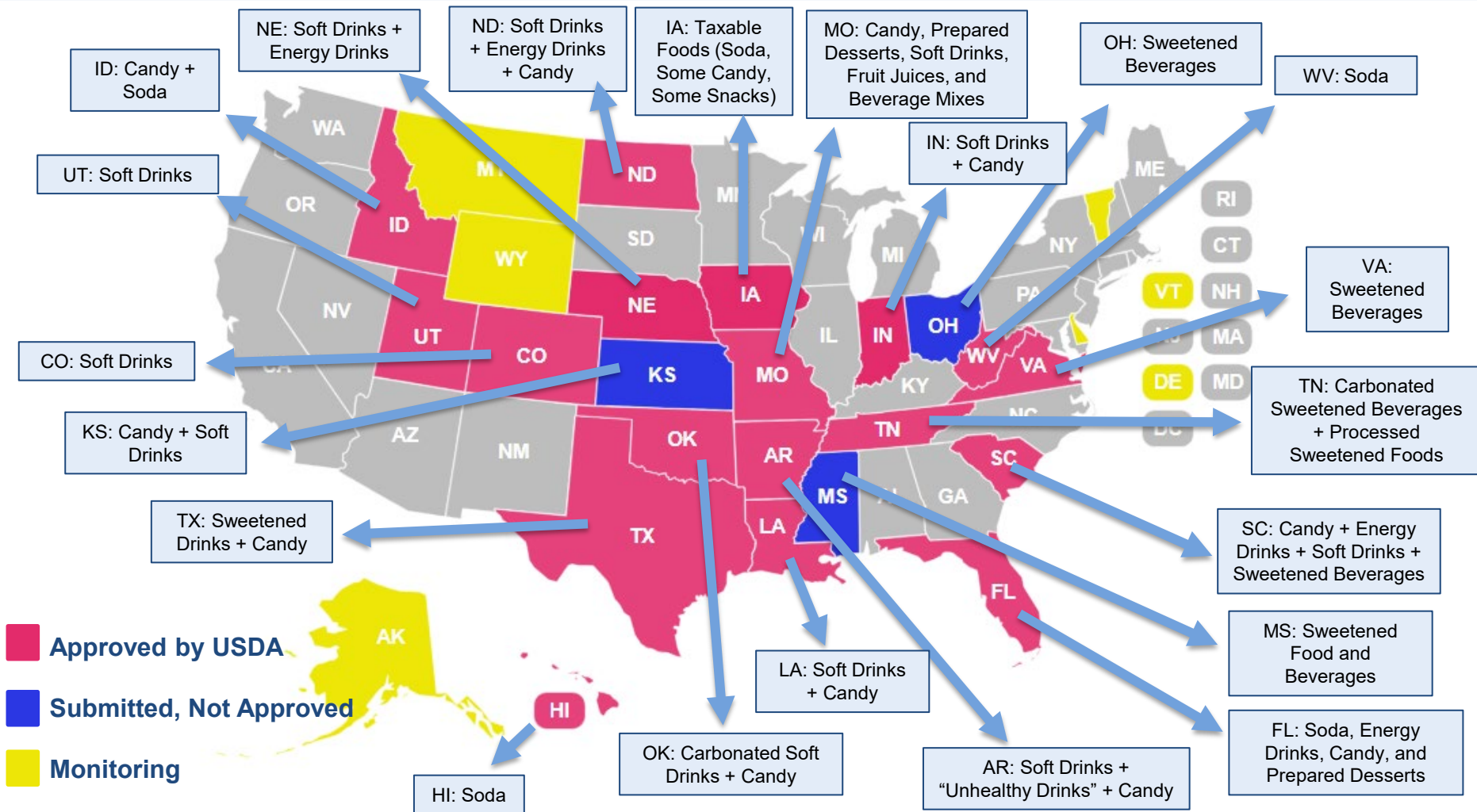
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Why the Trump administration won't let Maine ban soda and candy from food stamps

- Maine requested a waiver in 2018 to restrict **candy** and **sugar-sweetened beverages**
- USDA **denied** the waiver request due to concerns that it would:
 - Increase **administrative costs**
 - Impose **burdens** on SNAP retailers (especially small businesses)
 - Choose **winners** and **losers** in the food industry
 - Restrict what individuals could eat in their own homes without demonstrating clear evidence of **meaningful health outcomes**

"We don't want to be in the business of picking **winners** and **losers** among food products in the marketplace, or in passing judgment about the relative benefits of individual food products."

**USDA Secretary
Sonny Perdue**



Massive Implementation Cost to Industry

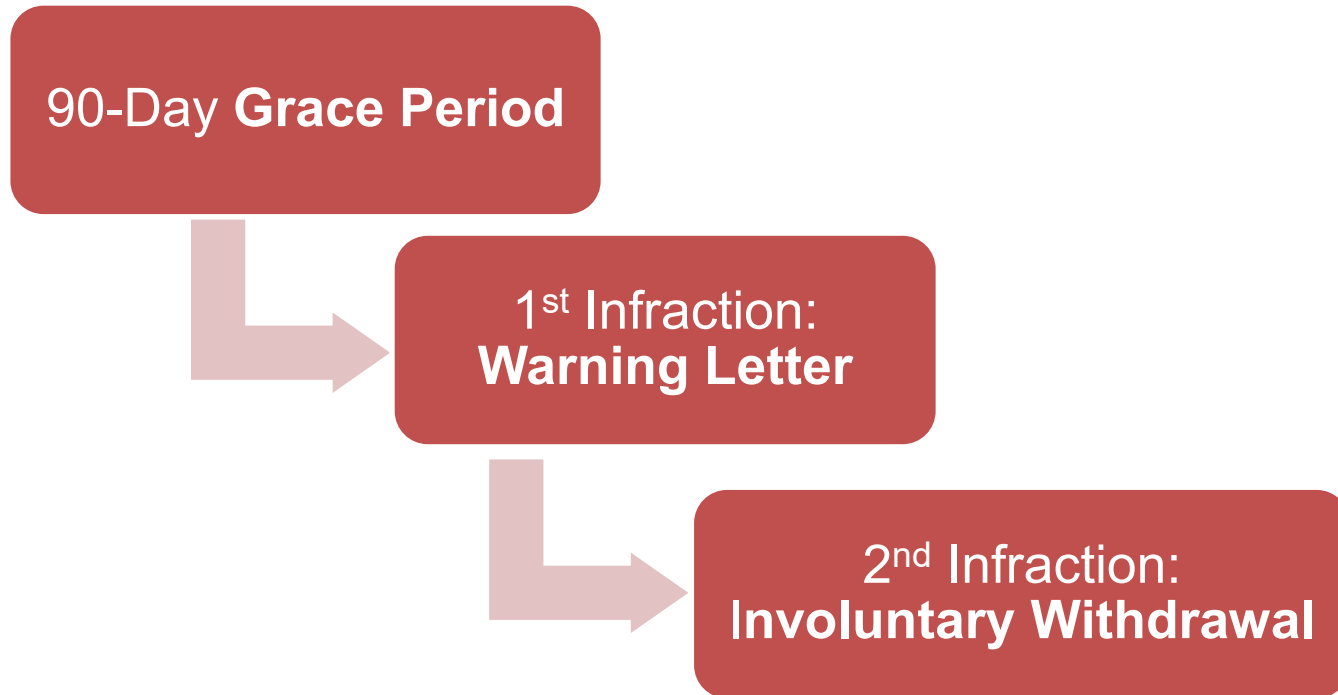
Up-Front Costs:

- **\$1 billion** for convenience stores
- **\$305.1 million** for supermarkets
- **\$11.8 million** for small-format stores
- **\$215.5 million** for supercenters

Ongoing Annual Costs to Maintain Compliance:

- **\$378.6 million** for convenience stores
- **\$281.4 million** for supermarkets
- **\$18 million** for small-format stores
- **\$81.1 million** for supercenters

USDA Enforcement



Implementation Dates

State	Implementation Date
Arkansas	7/1/2026
Colorado	3/1/2026
Florida	4/20/2026
Hawaii	8/1/2026
Idaho	2/15/2026
Indiana	1/1/2026**
Iowa	1/1/2026**
Louisiana	2/18/2026
Missouri	10/1/2026

State	Implementation Date
Nebraska	1/1/2026**
North Dakota	9/1/2026
Oklahoma	2/15/2026
South Carolina	8/31/2026
Tennessee	7/31/2026
Texas	4/1/2026
Utah	1/1/2026**
Virginia	4/1/2026
West Virginia	1/1/2026**

SNAP Retailer Stocking Requirements



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2025 Proposed Rule (2014 Farm Bill)

Current Stocking Requirements

3 varieties of food in the 4 staple food groups

- Vegetables or fruit
- Breads or cereals
- Meat, poultry, fish
- Dairy products

2025 Proposed Stocking Requirements

7 varieties of food in the 4 staple food groups

- Vegetables or fruit
- Grains
- Protein
- Dairy

Retailers Will Not Be Able to Meet 7 in Grains

1. **Raw Grains** for each different type of grain
2. **Flour (Grain-Based)** for each different type of grain
3. **Bread**
4. **Pasta / Noodles**
5. **Breakfast Cereals / Foods** (such as a box of corn flakes, frozen waffles, or pancake mix)
6. **Infant Cereal** *(not commonly stocked)*

Raw Grains

(each counts as separate variety)



Rice



Rolled Oats



Barley



Bulgur



Quinoa



Wheat Germ



Sorghum



Buckwheat



Farro

Flour (Grain-Based)

(each counts as separate variety)



Wheat Flour



Semolina Flour



Oat Flour



Rice Flour



Corn Flour

Bread

(these all count as
just 1 variety)



Pasta/Noodles

(these all count as
just 1 variety)



Breakfast Cereals/Foods

(these all count as
just 1 variety)

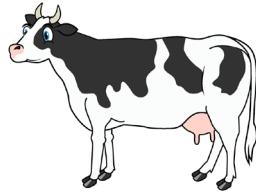


Retailers Will Struggle to Meet 7 in Dairy

1. **Perishable liquid milk** (such as whole milk, 2% milk, 1% milk, skim milk, etc.) for each different type of mammal
2. **Shelf-stable liquid milk** (such as canned, evaporated, condensed, or boxed milk)
3. **Cheese**
4. **Yogurt** (non-liquid)
5. **Butter**
6. **Infant formula** (*not commonly stocked*)
7. **Cream** (other than butter, which would continue to be its own separate variety), such as heavy cream, sour cream, and half and half
8. **Fermented or cultured dairy beverages**, such as kefir, buttermilk, and yogurt-based drinks (*kefir and buttermilk not commonly stocked*)
9. **Dried milk**, such as milk powder (*not commonly stocked*)
10. **Plant-based alternative** (only for up to three different dairy products listed above) (*not commonly stocked*)

**Perishable liquid
milk for each
different type of
mammal**

*(each counts as
separate variety)*



Cow



Goat



Sheep



Camel



Water Buffalo

**Shelf-Stable
Liquid Milk**

*(these all count as
just 1 variety)*



Evaporated



Condensed



Boxed



Canned

Cheese
(these all count as
just 1 variety)



Yogurt
(Non-Liquid)
(these all count as
just 1 variety)



Butter
(can only count as
1 variety)



Cream
(these all count as
just 1 variety)



**Fermented or
Cultured Dairy
Beverages**
(these all count as
just 1 variety)



Where Things Stand...

- **235 total comments** filed on proposed rule, nearly **100 from our industry**
 - **Additional supporting comments from:** Convenience Distributors Association, Food Research & Action Center, Energy Marketers of America, North American Millers Association, American Frozen Food Institute, National Milk Producers Federation, International Dairy Foods Association, the National Pasta Association, and dozens of regional anti-hunger advocacy organizations and tribal associations.



44 House Republicans Urge USDA to Reconsider SNAP Stocking Requirements

Members underscored the vital role that convenience stores play in delivering food access to SNAP participants.

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