



Navigating Uncertainty in the MAHA Era

Forces and wildcards reshaping the food industry and how to prepare

Robyn O'Brien | September 2026



MAHA signals



GLP-1 demand



Trade costs



Food safety

Four forces, one wildcard



MAHA mixed signals

Pressure and headlines to remove dyes and additives and cut processed foods



GLP-1 demand

GLP-1 drugs and food-as-medicine programs are reshaping grocery baskets



Trade costs

Tariffs rebuilt under new authorities keep input costs volatile



Food safety

Large recalls continue while federal oversight thins



The wildcard is politics. Do the midterms bring binding rules or fade into voluntary pledges?

FORCE 1 OF 4

MAHA mixed signals

100+

recommendations in the MAHA
Commission's strategy report



What's changing

- Petroleum-based dyes and other additives are being targeted
- A federal ultra-processed food definition and new labels are proposed
- **States are moving faster with their own bans and warnings**
- **MAHA sends mixed signals**



What to do

- Map every SKU against dye, additive, and UPF exposure
- Lock in natural colorant and clean-label supply now
- **Formulate to the strictest state rule to avoid SKU sprawl**
- **Follow the money. MAHA plays favorites.**

FORCE 2 OF 4

GLP-1 demand

1 in 5

U.S. households had a GLP-1 user
as of May 2026



What's changing

- GLP-1 households cut grocery spending 5–8% in the first six months
- Snacks and fast food lose; protein and smaller packs gain
- SNAP limits and local school sourcing shift program demand and is becoming a patchwork of state-specific rules



What to do

- Build pack-size flexibility with co-packers and packaging
- Secure protein and fiber ingredient capacity
- Forecast by household type and by state
- Retailers must update point-of-sale systems, inventory databases and product eligibility files, and train staff to handle declined transactions.

Trade costs

~60

economies now face new Section 301 tariff tiers of 10–12.5%



What's changing

- The Supreme Court struck down IEEPA tariffs; refunds are available
- New Section 301 tiers replaced them; EU goods pay a flat 15%
- Canada's retaliation threatens U.S. agricultural exports
- Drought risk adds pressure on produce
- Gasoline prices stand 27.4% higher than a year ago.



What to do

- File IEEPA refund claims through CBP
- Maximize USMCA-compliant sourcing, which is duty-free
- Price every contract by country of origin

FORCE 4 OF 4

Food safety & recalls

140

Class I (most serious) FDA food recall events in 2026, as of Sept 29



What's changing

- Undeclared allergens, Salmonella, and foreign material lead recalls
- Uninspected and unreinspected imports are driving meat recalls
- Traceability rule enforcement is delayed to July 2028
- Deregulatory climate and agency staffing cuts put more weight on company controls



What to do

- Verify suppliers and imports yourself; don't rely on federal checks
- Run mock recalls and aim to trace any lot within 24 hours
- Build traceability records now, ahead of the 2028 deadline

Two risks that cut across all four



Politics could swing either way

Supporters point to reformulation wins; critics say most deals are voluntary and unenforced. Plan for both outcomes rather than betting on one.



Impacts fall unevenly

Advocates warn that price and SNAP changes hit low-income and minority households hardest, and immigration enforcement strains farm and plant labor. Review access, labor practices, and supplier programs.

Six no-regret moves for the next 90 days

1 Recover tariff refunds and re-price contracts by origin

2 Map SKUs and lock in clean-label ingredient supply

3 Right-size packs and protein for GLP-1-era demand

4 Audit labor practices and equity exposure

5 Tighten supplier verification and recall readiness

6 Build plans for both political scenarios



Act on what's certain. Prepare for what isn't.

MAHA rules, changing demand, trade costs, and food safety risks are hitting the food supply chain at once.

Move now on the certain items, and keep plans ready for a hardening or a reversal of policy after the midterms.

Let's Connect!

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Information current as of late September 2026. Policy and tariff details change often; verify before acting. Not legal or financial advice.