01b · THE CANARY SERIES · V2.2

Why the Canary Is Singing.

The Tailwinds

Four demand-side forces are shrinking the runway for legacy Big Food. This is the pressure behind the ledger in 01a: the reason the rotation is forced, not chosen. v2.2 brings the record to Oct 29: SNAP limits widen, the UPF definition stalls, and a UPF label finally gets a price.

21%
US HOUSEHOLDS WITH A GLP-1 USER · MAY 2026

8
STATES ENFORCING SNAP LIMITS · 12 FROM NOV 1

$14.2B
YEARLY COST OF A UPF LABEL RULE · OCT 2026

147
TAGGED TAILWIND PRESS LIVE TRACKER · OCT 29

"The tailwinds do the underwriting for you. You just have to be in the right aisle."

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TABLE OF CONTENTS · V2.2

This paper.

Four forces. One barbell. A regulatory calendar the market has not finished pricing.

01 The Thesis
The rotation is demand-forced, not a portfolio preference.

02 GLP-1 · The Appetite Reset
21% of households. The basket shrinks and shifts to protein.

03 GLP-1 · Where It Lands on the Shelf
The 01d GLP-1 cut: which aisles rise, which fall.

04 MAHA · The Regulatory Wave
8 states enforce SNAP limits, 4 more Nov 1. The UPF definition stalls.

05 UPF · Litigation and Legislation
A UPF label would cost $14.2B a year. Now the state is on offense.

06 Gen Z · The Shelf Reset
Protein, fiber, mood: the reformulator brief in one sentence.

07 The Barbell
Premium BFY grows. Private label holds. The middle is squeezed.

08 The Regulatory Calendar
What has landed, what is scheduled, what is still in court.

09 What We Are Watching Next
Five catalysts through 2027.

WHAT IS NEW IN V2.2

› Public edition, brought to Oct 29. SNAP: 8 states enforcing, 4 more Nov 1, Ohio moved to Apr 2027. UPF definition still unreleased at OMB.

› New evidence: the EY-Parthenon GLP-1 survey, the $14.2B UPF label-cost study, FDA's GRAS proposal and protein-claim suits.

› Calendar and watchlist re-dated; press counts now read straight from the live tracker.

Live version for members. This PDF is a dated snapshot; the live desk updates every Monday. Request a code at gammill@nxp.vc · canary.nxp.vc/?track=members

01 · THE THESIS

Demand-forced. Not portfolio strategy.

The usual read of the Big Food rotation is portfolio strategy: sell the slow growers, buy the fast ones. That is directionally right and misses the mechanism. The rotation is a forced response to four demand-side forces that are cutting volume, pricing power and shelf space for legacy portfolios at the same time. The forcing is what makes the print reliable.

The four forces.

Each runs on a different mechanism, at a different speed, with a different trigger. Together they make 2024–2028 the window in which the rotation is unavoidable.

GLP-1 *appetite reset*	Weight-loss drugs shrink the basket and shift what is left toward protein. Snacks, sweets and baked goods take the cut; yogurt, meat snacks and bars gain.[3]
MAHA *regulatory wave*	SNAP purchase limits, state label and dye laws, and an FDA definition of ultra-processed food, each restricting legacy shelf a different way.[11,14,20]
UPF *litigation and legislation*	State investigations, claims class actions and a federal warning-label bill raise the cost of carrying legacy formulations.[23,24,26]
GEN Z *shelf reset*	The next primary shopper buys protein, fiber and mood foods, and snacks more than any cohort before it.[27,28]

v2.0 treated GLP-1 as a volume story. It is a basket story. The drugs do not just remove calories; they move spend between aisles. That is why 01b carries a chapter on where the appetite reset lands on the shelf, and why the archetype that wins is the one positioned in the aisles gaining spend, not the one with the cleanest label.

The tailwinds are structural. The aisle is the bet.

02 · GLP-1 · APPETITE RESET

The appetite bill is coming due.

This is the largest force in the file and the fastest-moving. One in five US households now includes a current user, more than double the share at the start of 2025.[1] Grocery spend in those households falls about 5% within six months of starting the drug, and more than 8% in higher-income homes.[3] The pill removed the last adoption barrier: two oral GLP-1s launched in 2026.[6,7]

21%	11%	−5.3%	61%
US HOUSEHOLDS WITH A USER · MAY 2026	US ADULTS ON A GLP-1 2026 · 3% IN 2024	GROCERY SPEND IN FIRST SIX MONTHS ON THE DRUG	USERS EATING MORE PROTEIN · OCT 2026

Sources: PwC[1] · Gallup[2] · Cornell[3] · EY-Parthenon[30]

What the evidence says.

› **It moved onto the earnings call.** Nearly three dozen companies outside health care cited GLP-1 or weight loss on early-2026 calls, against 14 a year earlier and five in 2024. PepsiCo, Coca-Cola and others are cutting ingredient lists and pack sizes; EY-Parthenon puts the snack exposure at up to $12B in lost sales over a decade.[4] Hershey credits GLP-1 habits for 8% retail growth in Ice Breakers mints;[5] Mars put Cheez-It Protein in its 2027 lineup.[31]

› **The pill is here, not in 2027.** Novo launched the Wegovy pill in the US on Jan 5, 2026;[6] the FDA approved Lilly's Foundayo (orforglipron) on Apr 1.[7] Pills widen the funnel but appear to curb snacking less than shots,[8] which softens the snack and candy hit at the margin.

› **The basket shifts, it does not just shrink.** Savory snacks fall about 10%; bread, baked goods and meat fall; yogurt, fresh fruit, bars and meat snacks rise.[3] Greek yogurt is up 6.8% and jerky 7.9% in user homes.[1]

› **Lapse is the hidden variable.** About a third of ever-users have stopped at any point;[9] Circana finds roughly half stop within a year, and frozen and beverage purchases revert when they do.[10] Candy and chocolate rebound after users stop.[3] A tailwind that reverses on lapse is weaker than its headline.

› **A second panel agrees.** In EY-Parthenon's October survey, 61% of users eat more protein, 66% more produce and 44% drink more functional beverages; 63% eat fewer sweets, 57% fewer salty snacks and 51% drink fewer soft drinks. For the first time a majority (54%) take the drug mainly to lose weight.[30]

03 · GLP-1 · WHERE IT LANDS

Protein rises. Carbs and frozen fall.

Canary 01d re-scored its 17 aisles for a GLP-1 household. The tailwind only blows in some of them.

#	AISLE	GLP-1 SCORE	BASE RANK	THE GLP-1 READ
1	**Deli and refrigerated protein**	**23**/30	#5 ▲4	Packaged and fresh protein are what GLP-1 households add; meat snacks up. Still no cohort brand.
2	**Everyday sandwich bread**	**22**/30	#1 ▼1	Bread spend falls in GLP-1 households, but a protein-fiber loaf is the cleanest reformulation brief on the shelf.
3	**Soup, broth and shelf-stable seafood**	**22**/30	#9 ▲6	Seafood is a GLP-1 gainer; protein broths and tinned fish re-rate a tired aisle.
4	**Refrigerated entrées and sides**	**22**/30	#11 ▲7	Fresh, portioned, protein-forward: the format GLP-1 users trade into. Private label is moving in.
5	**High-protein dairy**	**21**/30	#13 ▲8	Strongest GLP-1 demand on the shelf (Greek yogurt +6.8%), but Chobani and Good Culture hold it.
6	**Frozen breakfast and waffles**	**20**/30	#3 ▼3	Protein waffles work; frozen purchases tend to revert when users stop.
7	**Cold and hot cereal**	**19**/30	#2 ▼5	Carb-centric staple users leave; only the protein-forward version has a GLP-1 case.
8	**Baby and kids' food**	**19**/30	#8 =	Indirect: household spillover reaches kids, but the GLP-1 user is not the buyer.
9	**Family and multi-serve frozen**	**18**/30	#4 ▼5	Frozen takes the biggest GLP-1 hit, and the user wants a smaller portion, not a bigger one.
10	**Clean-base sauces, dressings**	**18**/30	#6 ▼4	GLP-1-neutral. Sugar-cut sauces for protein-and-vegetable plates help at the margin.
11	**Cooking oils and fats**	**18**/30	#10 ▼1	GLP-1-neutral. A MAHA story, not an appetite story.
12	**Baking flour and mixes**	**16**/30	#12 =	Baked goods are among the first cuts; protein mixes are the only GLP-1 angle.
13	**Dried pasta and grains**	**16**/30	#15 ▲2	Users are leaving pasta. Protein pasta is a real format, and Barilla already bought Goodles.
14	**Prebiotic and functional soda**	**13**/30	#14 =	Sugary drinks fall, functional drinks grow, but beverage habits revert after lapse.
15	**Candy reformulation**	**12**/30	#7 ▼8	Sweet treats are the most-cut category (61% buying fewer), and candy rebounds after lapse.
16	**Salty snacks and protein bars**	**12**/30	#16 =	Savory snacks −10%; bars and jerky gain, but 33 cohort brands already compete.
17	**Plant-based dairy**	**12**/30	#17 =	No GLP-1 lift; protein density is the wrong way round for most of the aisle.

FIGURE 1 · SCORE = 2 × BASKET DIRECTION + PROTEIN-FIBER HEADROOM + FATIGUE + OPEN FIELD + STICKINESS (30 MAX). SHADED: THE FIVE GLP-1 OPENINGS. ANALYST JUDGMENT AS OF OCT 1, 2026; METHOD AND SOURCES IN CANARY 01d CH. 08.

THE COHORT SKIPPED IT

Deli protein, tinned seafood and fresh entrées rise, with no cohort brand of scale. Bars, snacks and functional soda sit at the bottom.

PROTEIN AND FIBER

The brief narrows. A clean-label white loaf passes MAHA and fails GLP-1. Bread and cereal win only when rebuilt.

BOTH CUTS AGREE

Deli protein, the protein-fiber loaf and frozen protein breakfast: where the GLP-1 and MAHA tailwinds point the same way.

04 · MAHA · REGULATORY WAVE

The state-by-state squeeze.

MAHA works as a portfolio of small, cumulative restrictions rather than one federal law: SNAP purchase limits, state label and dye laws, and federal dye and definition work. Each is small. Together they shrink the legacy shelf without a single event Wall Street can price. 2026 added a new variable: the courts.

8	5	13	Aug 3
STATES ENFORCING SNAP LIMITS · 12 FROM NOV 1	WAIVERS VACATED IN COURT · JUN 22	SCHOOL-MEAL ADDITIVE LAWS · 5 IN FORCE	UPF DEFINITION AT OMB STILL UNRELEASED

Sources: USDA FNS[11] · Ashurst Perkins Coie[12] · Fox 5[41] · PBS/AP[33]

The three-front operation.

› **SNAP purchase limits.** USDA has approved soda and candy waivers for 23 states.[11] A federal court vacated five of them (Colorado, Iowa, Nebraska, Tennessee, West Virginia) on Jun 22, holding that USDA exceeded its authority.[12] USDA appealed in August.[13] Of the 23, eight states enforce limits now; Montana, North Dakota, South Carolina and Virginia start Nov 1, and USDA moved Ohio to Apr 1, 2027.[11,41] Nebraska is re-filing.[42] The map is still growing, but the legal basis is contested.

› **State label and dye laws.** Texas SB 25 requires a warning on labels for 44 listed ingredients, for labels created from Jan 1, 2027.[15] Louisiana SB 14 requires QR-code disclosure from Jan 1, 2028.[16] California's Food Safety Act bans Red No. 3 and three other additives from Jan 1, 2027,[18] and West Virginia's statewide synthetic-dye ban lands Jan 1, 2028.[17] Thirteen states have school-meal additive laws; five are in force.[14]

› **Federal dyes and the UPF definition.** FDA's revocation of Orange B took effect Sep 8, 2026, and Citrus Red No. 2 is proposed for revocation.[19] FDA sent a white paper proposing a definition of ultra-processed food to the White House budget office on Aug 3; it is a notice, not a rule.[20,21] It was still unreleased on Oct 23, when more than 100 experts urged its release;[33] Calley Means, its loudest champion at HHS, resigned Oct 22.[34] On Aug 10 FDA also proposed making GRAS notification mandatory, with 120 days of comment.[35]

05 · UPF · LITIGATION AND LEGISLATION

The cost of carrying legacy.

This is the force that turns sentiment into cost. The cost does not come from one blockbuster verdict. It comes from subpoenas, discovery, label changes and claim risk spread across a legacy portfolio. In the US the direction changed in 2026: a state attorney general, a Senate committee and the claims bar all moved against ultra-processed food in the same summer.

235
SUITS AGAINST HEALTH RULES · 2010–2025

3 in 4
RESOLVED CASES THE FOOD COMPANIES LOST

$14.2B
YEARLY COST OF A UPF LABEL RULE · U. CHICAGO

12–10
S. 5026 SENATE HELP VOTE · JUL 22, 2026

Sources: The Guardian[22] · FoodNavigator[32] · Senate HELP[24]

Four fronts.

› **Industry on defense, and losing.** Food and beverage companies and their trade groups filed 235 lawsuits against health policies in five countries from 2010 to 2025, mostly against labeling rules in Mexico; only six were in the US. Of resolved cases, the companies lost three in four.[22] Courts have mostly upheld the rules, and the fight now runs both ways: on Aug 20 a physicians' group sued to overturn the 2026 dietary guidelines over beef and dairy influence.[38]

› **The price of a label.** A University of Chicago study published Oct 17 finds 72.3% of about 450,000 products would qualify as ultra-processed, and puts a labeling rule at $14.2B a year, with $8.1B passed to shoppers, about $60 per household.[32]

› **State attorneys general.** Vermont has investigated Kraft Heinz's UPF research, development and marketing since May 2025, and on Jul 22, 2026 petitioned a state court to enforce its subpoena.[23] It is an investigation, not yet a consumer-protection suit, but it is the template other states can copy.

› **Federal legislation.** Sanders' Childhood Diabetes Reduction Act (S. 5026) would require front-of-pack warning labels on ultra-processed and high-sugar foods and ban junk-food ads aimed at children. It cleared Senate HELP 12–10 with bipartisan support[24] and has sat on the Senate calendar since Jul 28 with no floor vote.[36]

› **Claims litigation.** An appeals court revived the Chobani zero-sugar class action on Jul 28;[25] similar suits now target David protein bars and Liquid Death,[26] and Danone sued Chobani on Jun 15 over its 20G protein claims.[37] Claims risk now reaches BFY brands too, which favors substance over label copy.

06 · GEN Z · SHELF RESET

The next shopper is different.

Gen Z is the smallest force by press count and the most durable. It is not a trend cycle; it is the replacement of the primary shopper. Gen Z snacks more than any generation before it, nearly twice as much as Boomers,[28] and it shops for function: fiber, protein and mood.[27] That is the same brief GLP-1 households are writing from the other end.

~2×	13	Fiber	Protein
GEN Z SNACKING VS BOOMERS	GEN Z + SNAP TAGGED PRESS · LIVE TRACKER	THE GEN Z HEALTH CUE	WHERE GEN Z AND GLP-1 MEET

Sources: Fox News[28] · FoodNavigator-USA[27] · NXP tracker press file

The reformulator brief in one sentence.

A Wave 3.0 reformulator target should map to some mix of protein density, functional fiber, mood or energy benefit and a clean label. Goodles, bought by Barilla for $750M,[39] maps to protein and clean label. David maps to protein. Olipop and Poppi map to functional fiber. The pattern is not coincidence: these are the cues Gen Z buys on and the nutrients GLP-1 users protect.

The overlap with Chapter 03 is the point. Gen Z wants snackable protein and fiber; GLP-1 households want smaller, protein-dense portions. Both pull toward portioned protein and protein-fiber staples, and both pull away from the calorie-dense middle of the shelf. The shelf has noticed: NIQ counts 37,232 products carrying front-of-pack protein claims.[40]

MARKER PRESS · GEN Z

"Fiber, mood foods rise as Gen Z rethinks healthy eating." Almost every reformulator deal on the tape maps to a category named here. The shopper turnover is doing half the underwriting.

SOURCE · FoodNavigator-USA · Jan 21, 2026[27]

07 · THE BARBELL

The middle disappears.

The four forces do not press evenly. They press hardest on the middle of the shelf: legacy brands that are neither truly premium nor truly value. Premium BFY takes share from the top; private label and hard discount take it from the bottom. The middle is where reformulation has to happen, and where SNAP limits, claim risk and GLP-1 basket loss converge.

PREMIUM BFY

GROWING

Formulation-led brands and the Wave 3.0 targets. Protein- and fiber-forward, light on SNAP exposure, positioned in the aisles GLP-1 and Gen Z households are adding to.

EXAMPLES · David · Chomps · Olipop · Poppi (PepsiCo) · Goodles (Barilla)

LEGACY MIDDLE

SQUEEZED

Center-store CPG: high SKU count, mid price, mass distribution. Carries the GLP-1 basket loss, the SNAP exposure and the cost of every state label law.

EXAMPLES · Kraft Mac & Cheese · Chef Boyardee · Doritos · Oreo · Yoplait

VALUE / PRIVATE LABEL

HOLDING

Store brands and hard discount. Higher prices are making shoppers more deliberate, and GLP-1 users lead the shift.[29] Not the rotation target, but the pressure valve.

EXAMPLES · Trader Joe's · Aldi · Kirkland · Great Value

The GLP-1 cut sharpens the barbell. The premium end that grows is not premium in general; it is premium protein and fiber. A premium candy or chip brand sits on the wrong side of the appetite reset even with a clean label.

Premium is not the position. Protein and fiber are.

08 · THE REGULATORY CALENDAR

What Wave 3.0 is trading against.

The window for capital-efficient BFY entry is set by the calendar. Each dated step below adds cost to the legacy middle; the 2027–2028 label and dye deadlines are where reformulation stops being optional. Wave 3.0 buyers are closing ahead of those dates, while entry multiples still reflect the old shelf.

DATE	EVENT	STATUS
Aug 3, 2026	FDA UPF definition sent to OMB; still unreleased on Oct 23[20,33]	STALLED
Aug 10, 2026	FDA proposes mandatory GRAS notification; 120-day comment period[35]	COMMENT OPEN
Aug 2026	USDA appeals Aragon v. Rollins to the D.C. Circuit[13]	IN COURT
Sep 8, 2026	Orange B revocation takes effect[19]	DONE
Nov 1, 2026	SNAP limits start in Montana, North Dakota, South Carolina and Virginia[11,41]	SCHEDULED
TBD	S. 5026 floor vote; on the Senate calendar since Jul 28[36]	AWAITING
Jan 1, 2027	California Food Safety Act bans Red No. 3 and three additives[18]	SCHEDULED
Jan 1, 2027	Texas SB 25 warning labels apply to new labels[15]	SCHEDULED
Feb–Apr 2027	SNAP limits start in Kansas, Missouri, Hawaii and Ohio (moved to Apr 1)[11]	SCHEDULED
Jan 1, 2028	West Virginia dye ban and Louisiana SB 14 disclosure take effect[16]	SCHEDULED

Two items are missing on purpose. v2.0 projected a 30-state SNAP map by 2027 and a first large-cap UPF verdict in 2027–28. Neither has a dated basis today: the SNAP map now depends on the appeal, and the Vermont matter is still an investigation.

The discount window runs from now to the 2027–28 label deadlines. Wave 3.0 buyers are closing before it narrows.

09 · WHAT WE ARE WATCHING NEXT

Five things.

The tailwinds are structural, but near-term catalysts still set entry timing. These are the five the NXP tracker is watching hardest into 2027.

01 **GLP-1 lapse and the pill**
Whether oral GLP-1s keep users on therapy longer. Stickiness decides whether the basket shift is permanent or reverts; pills curbing snacking less than shots is the first data point.[8,9]

02 **Aragon v. Rollins on appeal**
A D.C. Circuit ruling either restores the five vacated waivers or exposes the other 18 to the same challenge. Until it rules, every new waiver carries the same legal risk.[13]

03 **The FDA UPF definition**
The white paper has sat at OMB since Aug 3; experts are pressing for release and its chief champion at HHS has left. Publication starts the clock on procurement, labeling and litigation that can attach to it.[20,33,34]

04 **Vermont v. Kraft Heinz**
If the subpoena fight turns into a consumer-protection suit or a settlement, other state attorneys general have a template to follow.[23]

05 **S. 5026 and the claims bar**
A floor vote would make warning labels and a kids-ad ban law-adjacent. Meanwhile the zero-sugar and protein-claim suits show claim risk now reaches BFY brands as well as legacy.[36,26,37]

HOW 01b READS INTO THE SERIES

The tailwinds explain why the rotation in 01a is forced. The GLP-1 cut explains where it lands. Canary 01d names the aisles still open to a new brand; this paper says which way the wind is blowing in each of them.

COMPANIONS · 01a v2.6 THE CANARY IN THE GOLD MINE · 01d v1.1 WHERE THE CANARY FLIES NEXT (MEMBERS)

MEMBERS · THE LIVE CANARY DESKS

This paper is a snapshot. The desk is live.

Members get the Rotation, Tailwinds and Shelf as live sections of the Canary Tracker, carried forward every Monday from the same ledger this paper was cut from. The papers tell you where the canary was. The desk tells you where it is.

131	147	17	101
DEALS IN THE LIVE LEDGER	TAGGED TAILWIND PRESS ITEMS	AISLES SCORED TWO CUTS	BFY BRANDS MAPPED TO AISLES

COUNTS FROM THE LIVE TRACKER AT THE TIME THIS PDF WAS BUILT

01a · ROTATION

The live ledger

Every Big Food buy and sell since this paper's cut, tagged to a wave and an archetype. The nine-major rotation axis and the reformulator scorecard, re-cut every Monday.

01b · TAILWINDS

The live forces

Tailwind press tagged to GLP-1, MAHA, UPF and Gen Z. The regulatory calendar with countdowns, and what each date does to the shelf.

01d · SHELF

The full Shelf

All 17 aisles scored on five tests, the base and GLP-1 cuts side by side, all ten openings, and the brands and deals landing in each aisle since Oct 1.

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3. The Shelf opens at https://canary.nxp.vc/?track=shelf.

The DEMAND, SUPPLY, CAPITAL, RESEARCH and IDEAS tracks stay open to everyone at canary.nxp.vc.

LIMITS AND SOURCES · V2.2

The record.

Facts are as of Oct 29, 2026. Press counts on the cover and in Chapter 06 come from the live tracker on Oct 29 (58 GLP-1, 40 MAHA, 26 UPF, 13 Gen Z and SNAP, plus 10 cross-force items; 147 in all). Chapter 03 scores are analyst judgment as of Oct 1, documented in Canary 01d v1.1. GLP-1 survey figures come from different panels and periods.

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