



April 13, 2011

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Chief, Policy and Program Development Branch, Child Nutrition Division
Food and Nutrition Service, Department of Agriculture
3101 Park Center Drive, Room 640
Alexandria, Virginia 22302-1594

Docket ID: FNS-2007-0038-0001

Re: Nutrition Standards in the National School Lunch and School Breakfast Program

Dear Ms. Brewer:

Produce for Better Health Foundation (PBH) is pleased to submit these comments to the U.S. Department of Agriculture Food and Nutrition Service regarding Nutrition Standards in the National School Lunch and School Breakfast Program.

Produce for Better Health Foundation is a non-profit 501 (c) (3) fruit and vegetable education foundation. Since 1991, PBH has worked to motivate people to eat more fruits and vegetables to improve public health. PBH achieves success through industry and government collaboration, first with the 5 A Day program and now with the Fruits & Veggies-More Matters public health initiative.

In light of the Administration's keen focus on eliminating obesity within a generation and the new *Dietary Guidelines for Americans* (which calls for fruits and vegetables to make up half the plate), it is critical that the amount and variety of fruit and vegetable servings in school meals be increased.

Numerous studies have found that children and adolescents do not consume the recommended amounts or variety of fruits and vegetables. Students who participate in the school meal programs consume more fruits and vegetables than nonparticipants; however, they still fall well short of recommended levels. It is critical that children see good tasting, healthful food choices, including plenty of fruits and vegetables, as the "norm" in school. Many adults eat fruits and vegetables *because* they learned to eat them as children. *Changing* eating behavior is harder than learning good eating behavior.

The USDA school meal proposal represents the strongest school meal standards to date and we appreciate USDA's efforts to reflect the evidence-based analysis put forth by the Institute of Medicine Committee on Nutrition Standards for National School Lunch and Breakfast Programs in its report *School Meals: Building Blocks for Healthy Children*.

Since other organizations will likely address all components of the proposed rule, PBH will primarily focus our comments on the components that pertain to nutrition education and fruits and vegetables.



COMMENTS IN SUPPORT OF SPECIFIC PROVISIONS OF THE PROPOSED RULE

1. PBH supports the recommendation that “all forms” of fruits and vegetables (fresh, canned, frozen, dried, and 100% juice) be allowed to meet the fruit and vegetable requirements outlined in the proposed rule, but offers minor suggestions.

The proposal rule suggests that frozen fruits without sugar are allowed, and that fruit may be canned in fruit juice, water or light syrups. Canned vegetables would have to be low sodium to stay within the proposed sodium limits. PBH agrees generally with the proposal but offers added points for consideration:

a. Frozen Fruit

- ✓ Frozen fruit should not be held to a higher standard than canned fruit. If canned fruit in light syrup is allowed (which we believe is acceptable), then frozen fruit should be allowed a small amount of added sugar. Specifically, frozen fruit is sometimes rinsed in a sugar bath, providing minimal added sugar, but offering an important role in maintaining the structural integrity of the fruit during the freezing/thawing process which provides a more appealing product for the student in the school lunch or breakfast line.
- ✓ For (any) fruit to use the Fruits & Veggies—More Matters brand logo on product packaging (replacing the 5 A Day logo), it must meet specific criteria that was determined by the Centers for Disease Control & Prevention (CDC). These criteria are noted below and may also be useful as a benchmark for the “added sugar” component of canned/frozen fruit:

Each serving of product should limit the amounts of added sugars or caloric sweeteners:

- *Added sweeteners are allowed at ≤ 8 calories per serving (e.g. $\leq 1/2$ tsp. sucrose or equivalent amount of other sweetener).*
- *Concentrated fruit juice sweeteners, jams, and jellies count as added sugars.*

b. Sodium

- ✓ While the Fruits & Veggies—More Matters brand logo can be allowed on a serving of fruit or vegetables that contains ≤ 480 mg sodium, we are comfortable with lowering the sodium as outlined in the proposed rule. However, innovative recipes and serving suggestions using low-fat, low-sodium herbs, spices, dressings, dips, etc. will be important to make sure that lower-sodium vegetables (whether frozen, canned, fresh, or juiced) are appealing to children.

2. PBH supports the requirement to double the amount of fruit served at school breakfast to 1 cup per day.

This change will align school breakfast with the *Dietary Guidelines* and help children increase their overall fruit and vegetable intake as recommended by national health authorities. Eating a nutrient-dense breakfast is an important principle for promoting calorie balance and weight management.

3. PBH supports the recommendation that only half of the total amount of fruit served at breakfast be in the form of 100% juice.

Although 100% fruit juice is a valuable part of a healthy diet, the American Academy of Pediatrics recommends that children ages 1-6 limit juice intake to 4-6 ounces (or one serving) a day and children ages 7-18 should limit their juice intake to 8-12 ounces (or two servings) a day. The 2010 *Dietary Guidelines* notes that the majority of fruit recommended should come from whole fruits, whether fresh, canned, frozen or dried. As such, PBH thinks it is appropriate that only half of the total amount of fruit

served at breakfast can be in the form of 100% juice. Products containing less than 100% juice should not be allowed.

4. PBH supports the proposed requirement to increase the amount of fruit served at lunch to ½-1 cup per day and to increase the amount of vegetables served at lunch to ¾-1 cup per day.

This change will align school lunch with the *Dietary Guidelines* and help children increase their overall fruit and vegetable intake as recommended by national health authorities. The goal of changing the nutrition standard for lunch, including serving more fruit and vegetables, is to improve children's eating habits. Therefore, it is important that schools serve fruits and vegetables that children like to eat. This is especially important in light of the requirement that children take at least one fruit or vegetable at lunch in order for the meal to be counted as a reimbursable meal.

5. PBH supports the proposed requirement to serve both a fruit and a vegetable everyday at lunch.

This change will align school meals with the *Dietary Guidelines* and help children increase their overall fruit and vegetable intake as recommended by national health authorities.

6. PBH supports the proposed requirement to serve dark green and orange vegetables weekly. Additionally, we support including a new red-orange vegetable subgroup in the proposed meal standards.

We support the proposed requirement to serve dark green, red and orange vegetables each week. The proposed rule would require that at least ½ cup of dark green vegetables be served each week, at least ½ cup of red vegetables be served each week and that ½ cup of orange vegetables be served each week. This change will align school meals with *Dietary Guidelines* recommendations to eat dark green, red and orange vegetables weekly. Many children do not eat a variety of vegetables and current consumption of dark green, red and orange vegetables is very low. Dark green, red and orange vegetables are good sources of vitamins A, C, and K, potassium, folate, magnesium, and dietary fiber. Eating a variety of colorful vegetables ensures nutrient adequacy. The addition of red vegetables to the orange vegetable subgroup would give tomatoes and tomato products more prominence and help balance the vegetable subgroups. Tomatoes and tomato products are also very popular with children and tomatoes are a good source of vitamins A and C and potassium.

7. PBH supports the proposed food-based meal patterns for breakfast and lunch.

We support food-based meal patterns for breakfast and lunch. Food-based meal standards will help align school meals with the *Dietary Guidelines* and reinforce school nutrition education programs. A basic premise of the 2010 *Dietary Guidelines* is that nutrient needs should be met primarily by consuming a variety of nutrient-dense foods from the basic food groups. Fruits and vegetables are naturally nutrient-dense and low in calories.

8. PBH supports the proposed standards for menu planning.

We support USDA's proposal for a food-based approach to menu planning with three consistent age-grade groups for breakfast and lunch. The proposed meal pattern for breakfast would include fruit, grains, meat/meat alternatives and milk. The proposed meal pattern for lunch would include fruits, vegetables, grains, meat/meat alternatives and milk. This proposal offers a simplified approach to menu planning while maintaining consistency with the basic premise of the *Dietary Guidelines*: that nutrient needs should be met primarily by consuming nutrient-dense foods. The intent of the proposed changes is to offer school meals that are nutrient-rich and calorie appropriate—specifically more fruits, vegetables, and whole grains consistent with the *Dietary Guidelines*.

9. PBH supports the proposed minimum and maximum calorie levels for grades K-5, 6-8 and 9-12 for breakfast and lunch.

We agree with USDA's proposal for calorie minimum and maximum levels in the school meal programs. We agree with the new age/grade groupings which better align with current school grade

levels. The calorie ranges proposed are consistent with the updated Dietary Reference Intakes (DRI's) and appropriate for the updated age/grade groupings. The ranges support the need to balance between providing good nutrition, addressing concerns about childhood obesity, and addressing food insecurity. They also will support the school meal programs in modeling appropriate portion sizes and calorie levels.

With 32% of children in the U.S. already overweight and obese, it is important that school meals not include excessive calories from added sugars and added fat. We agree that the intent of these changes is not to reduce children's food intake, but to focus on nutrient-dense foods, increased amounts of fruits, vegetables and whole grains, and avoid excessive calories. Currently many schools have to add sugar to foods/recipes in order to meet calorie requirements. This results in cookies or other desserts being served instead of fresh fruit at lunch. The proposed calorie maximums leave little room for discretionary calories from added sugar and fats.

10. PBH supports the proposed elimination of fortified grain-fruit products.

We support the proposed change to disallow fortified grain-fruit products from being credited as a fruit serving. A basic tenant of the *Dietary Guidelines* is that nutrients should come primarily from consumption of whole foods that are not highly processed or heavily fortified. Fruits and vegetables are nutrient-dense foods and are often excellent and/or good sources of dietary fiber, potassium, and Vitamins A and C. The nutrient-density of fruits and vegetables can not be duplicated by a processed grain-fruit product. Fortified grain-fruit products are often high in sugars and fat. Such products do not support the *Dietary Guidelines* recommendation to consume fruit as a separate and important food group.

11. PBH supports disallowing the crediting of snack-type fruit or vegetable product (such as fruit strips or fruit drops, etc.), regardless of their nutrient content, toward meeting the fruit and/or vegetable component of the meal.

We support USDA's proposal to disallow the crediting of snack-type fruit or vegetable products (such as fruit strips or fruit drops, etc.), regardless of their nutrient content, toward meeting the fruit and/or vegetable component of the meal. The *Dietary Guidelines* emphasizes increasing fruit and vegetable consumption by eating whole fruits and vegetables (fresh, canned, frozen, or dried). Foods served as part of the school meals programs should be easily recognized by children as a fruit or a vegetable. A wide variety of fruits and vegetables are readily available in the U.S. and schools should have no problem finding real fruits and vegetables to serve in meals.

We also support the requirement that fruits and vegetables, other than dried fruit and leafy greens, be credited based on volume served.

12. PBH supports the proposal to require schools to identify the foods composing a reimbursable meal at or near the beginning of the serving line.

We support the proposal to require schools to identify the foods composing a reimbursable meal at or near the beginning of the serving line. This will support the goals of the nutrition programs and promote nutrition education by helping children identify healthy, balanced meals with appropriate portion sizes and representation from all food groups. It also may help reduce crediting problems for school meals by encouraging children to select a full meal.

13. PBH supports the proposal to require all schools to implement the new nutrition standards beginning in school year 2012-2013, with final whole grain requirements implemented in school year 2014-15.

We support the proposed implementation schedule to begin full implementation of the new meal standard in the school year 2012-2013, with the whole grain requirements and sodium reduction targets phased in over time. Updating school meals to align with the *Dietary Guidelines* is long overdue.

Current meal standards are not consistent with dietary guidance for increasing fruits, vegetables, whole grains, and reducing sodium and trans fat.

Since January of 2005, USDA has strongly encouraged schools to serve more fruits, vegetables and whole grains as recommended by the *Dietary Guidelines*. USDA also has provided technical assistance and guidance to help schools offer meals that reflect the recommendations of the *Dietary Guidelines*. To motivate schools to make these important changes, USDA launched the HealthierUS Schools Challenge (HUSCC) several years ago. The HUSCC focuses on incentivizing schools to serve more fruits, vegetables, whole grains, etc. and recognizes schools who meet the HUSCC criteria. More recently, HUSCC was incorporated as a key priority of the Let's Move initiative. In addition, in October of 2009, the Institute of Medicine published recommendations for aligning school meals with the *Dietary Guidelines* in its report "School Meals: Building Blocks for Healthy Children." The IOM's recommendations were widely discussed and disseminated to school food officials.

Schools have had ample notice and encouragement to implement the principles in the *Dietary Guidelines*. Thus, requiring schools to implement the new standards beginning in the 2012-2013 school year should be feasible. It's time for all school children to have access to healthier school meals every day.

COMMENTS IN OPPOSITION TO SPECIFIC PROVISIONS OF THE PROPOSED RULE

1. PBH opposes singling out starchy vegetables, including white potatoes, corn, and green peas and restricting their amount to only 1 cup per week in school lunch. We urge USDA to be more concerned about how these vegetables are *prepared* and that a wide variety of vegetables are offered weekly.

We oppose limiting the amount of starchy vegetables to only 1 cup per week. We urge USDA to be more flexible and encourage schools to serve a greater variety of fruits and vegetables, but not to restrict starchy vegetables or any other fruit or vegetable. Putting limits on these healthy vegetables reduces the ability of school food officials to deliver healthy and favored vegetables that provide key nutrients to children and at a serving cost that is manageable for schools.

Any significant limitation or exclusion of a group of fruits/vegetables also implies to schools, parents, and students that they are not as good as other fruits and vegetables, which is counter-productive to increasing overall fruit/vegetable consumption. Instead, the focus should be on serving nutrient-dense forms of all fruits and vegetables to increase children's overall intake. For example, USDA should urge schools to limit deep fried foods. Schools should be allowed flexibility to provide additional, good-tasting, healthy fruit/vegetable options (e.g. baked potato bars; frozen peas as part of a salad bar; or corn as part of a Mexican fiesta with a side of tortilla soup.) Simply encouraging *all* fruits and vegetables and offering a wide variety weekly, prepared in tasty, healthful ways, is what is absolutely critical. We believe such a mandate of limiting specific vegetables or fruit is a "slippery slope" and begs the question "which one is next?"

2. PBH supports IOM's preferred option for standards for meals selected by the student (offer vs. serve) that requires students to select 1 fruit at breakfast and 1 fruit or 1 vegetable at lunch, but also supports flexibility for schools as needed.

We agree with USDA's proposal to accept IOM's recommendation to promote the selection of fruits and vegetables in the school lunch and breakfast programs under Offer vs. Serve (OVS). Given that 80-90% of children do not consume the recommended servings of fruits and vegetables, both IOM's preferred and alternative OVS options would better help school meals close that gap. We ask USDA to clarify the specific amount of fruit or vegetable that a student must select in order to count as taking the required fruit or vegetable. Does the student have to take 1 serving or 1/2 cup to meet this requirement?

Does the student have to take the full fruit or vegetable required amount to meet this requirement?
USDA's intent regarding the amount of fruit or vegetable that must be taken needs to be clearly stated.

We recommend that USDA adopt IOM's preferred option for OVS. However, USDA should allow school districts to implement the alternative method upon request, should they determine the alternative method better meets the needs of their students. While we support USDA's rationale that the preferred option is more conducive to preserving the nutritional integrity of school meals, IOM's second alternative is designed to offer additional flexibility within the new system. This would allow students more choice and better control of the amount of food on their plate, and help to reduce calories and, in some cases, intake of fat and sodium from breakfast meats. The alternative option also would provide more flexibility for children to choose foods consistent with their cultural food preferences, religious requirements, allergies, and vegetarian diets.

Adopting IOM's second alternative provides a practical, cost effective way to increase the attractiveness of the school breakfast program for schools and children and reduce plate waste. IOM's second alternative still maintains nutritional integrity given the increased number of servings that must be offered in the new meal pattern compared to the existing pattern. At the same time, this alternative also secures the selection of fruits and vegetables.

GENERAL COMMENTS

Training & technical assistance: We applaud FNS for recognizing the importance of ensuring that school food service staff receive training and technical assistance to help them make the proposed changes and improvements to school meals. We support the technical assistance topics proposed in the rule, such as updating USDA menu planning resources and providing guidance materials on fruits, vegetables, and whole grain foods.

Collaboration: We urge FNS to proactively work with partners within USDA, other agencies, such as the Centers for Disease Control and Prevention, the Department of Education, and the Department of Defense, and non-profit organizations like PBH to extend USDA's reach and engage other important stakeholders in promoting and supporting healthy school nutrition environments.

Nutrition promotion: In addition to the training and technical assistance outlined in the rule, it will be critical for FNS to ensure that effective promotion and marketing strategies are integrated into its efforts. For example, it is not enough to update materials and databases for menu planning and procurement for school food service staff. Marketing and promotion are critical to ensuring that menus are developed and meals are prepared and promoted in ways that engage and appeal to students. We urge FNS to include a strong marketing and promotion component in training and technical assistance efforts.

Studies show and companies and parents know that food marketing affects children's food preferences, diets and health. Schools should implement social marketing campaigns to increase the appeal of healthy school meals to students. USDA also should support these efforts through other USDA nutrition programs, such as SNAP-Ed and Team Nutrition. Creating synergy between USDA programs, and other federal government and non-government programs, focused on nutrition promotion and food marketing, will increase their effectiveness and maximize federal nutrition resources.

Cafeteria/classroom link: The cafeteria is often viewed as the place where lessons learned in the classroom can be applied. Marketing and promotion efforts should include collaboration and coordination with classroom-based learning to ensure that students recognize and can actively apply the information they gain in their academic lessons to the food and beverage options available in the cafeteria. Schools need model materials, curricula, and encouragement to implement this approach.

Equipment and infrastructure needs: We are pleased that USDA has provided resources for school food service equipment for the first time in over two decades. The \$100 million provided through the 2009 American Recovery and Reinvestment Act Equipment Grants and the \$25 million provided through the CNR extension have been important resources to schools as they work to improve the nutrition quality of school meals. As you know, application requests for funding totaled \$600 million, which provides a clear indication of unmet need among school food authorities (SFAs) that are eager to replace unhealthy preparation tools and methods with steamers, ovens, and salad bars.

Contrary to the proposed rule's assertion that much of SFA's demand is related to routine replacement of old equipment, the Institute of Medicine concluded that schools will need to purchase equipment specifically to implement the new meal requirements. The IOM also found that improving the quality of school meals--by adding fruits and vegetables, as well as decreasing saturated fat and sodium—may require additional equipment for many food service operations. The IOM pointed out that schools may need assistance to replace deep fat fryers with steamers and microwave ovens, as well as add items such as fruit and vegetable preparation sinks, refrigeration units, and utensils to prepare ready-to-eat portions of fruits and vegetables. As the proposed regulations are implemented, we urge FNS to engage with other agencies, organizations, and Congress to secure additional equipment funding to help schools meet the new meal pattern requirements.

State vs. Federal Standards: PBH does not support states imposing more restrictive meal components and nutritional requirements, and strongly urges USDA to ensure consistent national meal standards. State standards that exceed federal standards are often not based on science, increase school meal costs without compensation, complicate administration of this national program, and make it more difficult for industry to provide acceptable products at reasonable prices.

Overall PBH commends USDA for proposing these important changes to the nutrition standards for the National School Lunch and School Breakfast Programs to align them with the 2010 *Dietary Guidelines*.

We urge the agency to quickly issue a final rule to allow schools to prepare for implementation in the 2012-2013 school year.

Thank you for the opportunity to provide comments. Please contact us if you have any questions.

Sincerely,



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