



New York Farm Bureau • 159 Wolf Road, Suite 300 • Albany, New York 12205 • (518) 436-8495 • www.nyfb.org

March 24, 2022

Tina Namian, Chief
School Programs Branch
Policy and Program Division- 4th Floor
Food and Nutrition Service
1320 Braddock Place
Alexandria, VA 22314

Re: Docket ID: FNS-2020-0038; Child Nutrition Programs: Transitional Standards for Milk, Whole Grains, and Sodium

Dear Ms. Namian,

The New York Farm Bureau (NYFB), New York State's largest general farm organization, appreciates the opportunity to comment on the Food and Nutrition Service's Transitional Standards for Milk, Whole Grains, and Sodium. Our farmers produce healthy fruits, vegetables, dairy products and meats that are produced in accordance with the highest standards for quality, food safety and environmental protection. The child nutrition programs are critical for providing high quality and nutritious food for children of all ages but especially as part of the school meal program.

Schools account for about 7.5% of total U.S. milk sales making them an essential outlet for dairy farmers to market their products. AFBF supports allowing the National School Lunch Program (NSLP) and School Breakfast Program (SBP) to offer flavored milk options, alongside unflavored options, as part of a reimbursable meal and for sale as a competitive beverage. Serving milk, including flavored options, is critical for children and adolescents who may not generally obtain necessary levels of Vitamin D, potassium, high quality protein, calcium, Vitamin A, Vitamin B12 and other key nutrients. As a leading dairy-producing state, New York farmers work hard to produce healthy and nutritious milk and other dairy products for use in schools.

Numerous studies have shown modest to significant drops in milk consumption after flavored options are removed, limiting intake of essential nutrients. For example, a 2019 study published in the *Journal of the Academy of Nutrition and Dietetics*¹ found that significantly fewer students selected milk in schools when flavor options were removed (a drop from 94% to 57%).

¹ Juliana F.W. Cohen, Scott Richardson, Eric B. Rimm, Impact of the Updated USDA School Meal Standards, Chef-Enhanced Meals, and the Removal of Flavored Milk on School Meal Selection and Consumption, *Journal of the Academy of Nutrition and Dietetics*, Volume 119, Issue 9, 2019, Pages 1511-1515
<https://doi.org/10.1016/j.jand.2019.04.003>

Consumption of milk also drops considerably (64% of students to 54% of students) when flavored options were removed. Less selection and consumption contribute to heightened rates of food waste. Additionally, parents have shown widespread support for including flavored milk in public school meals for children in their community. According to the International Dairy Foods Association² 85% of national parents support the inclusion of flavored milk options at schools.

Leading nutrition organizations such as the Academy of Nutrition and Dietetics³ have also confirmed that reformulation of flavored milk has enabled school systems to include flavored options without exceeding healthy caloric ranges with flavored milk options only 25 calories more, on average, than their unflavored counterparts. Further flavored milk product innovation has led to a stable decrease in the concentration of added sugars with a 44% drop over the past decade. Regulatory flexibility in flavored milk offerings promote product investment and innovation helping farmers market their milk through additional channels.

While NYFB applauds USDA for increased flexibility on flavored milk options, we strongly support the return of whole and 2% milk options, flavored and unflavored, in the NSLP and SBP. Children and adolescents often find whole and 2% milk options more palatable than low or nonfat options. Like the removal of flavored milk, restrictions on fat content reduce consumption of vital nutrients by students. Between 2008 and 2018, weekly milk consumption per student dropped from 4.03 eight-ounce bottles to 3.39 bottles (-15%). Student milk consumption dropped more rapidly after whole and 2% milk options were removed from schools under the Healthy, Hunger Free Kids Act after 2012. Between 2008 and 2012 weekly milk use by students dropped 0.03 bottles year over year. After 2012 consumption dropped 0.13 bottles annually - a 77% difference.⁴ In addition to lower consumption, a continued ban on whole and 2% milk in schools contradicts modern nutritional science. It is widely recognized by pediatric dietitians that adequate fat intake is essential to proper brain development and to support the energy requirements of young children. Furthermore, numerous recent studies have revealed the previously assumed correlation between obesity and milk fat content to be false. In a 2020 American Journal of Clinical Nutrition article⁵, researchers found that, “relative to reduced-fat cow-milk, whole-fat cow-milk consumption was associated with lower odds of childhood overweight or obesity.” The researchers went further to conclude that international guidelines that recommend reduced-fat milk for children may not lower the risk of childhood obesity. A second American Journal of Clinical Nutrition article⁶ from 2016 also found a positive correlation between milk fat content and Vitamin D uptake stating, “whole milk consumption among healthy young children was associated with higher vitamin D stores and lower body mass

² Voter Polling on Milk in School Meals, Conducted by Morning Consult <https://www.idfa.org/resources/voter-polling-on-milkin-school-meals-conducted-by-morning-consult>

³ <https://www.agri-pulse.com/ext/resources/pdfs/s/Academy-Comment-re-IFR-on-School-Foods.pdf>

⁴ <https://www.documentcloud.org/documents/6189991-Milk-in-schools.html>

⁵ Shelley M Vanderhout, Mary Aglipay, Nazi Torabi, Peter Jüni, Bruno R da Costa, Catherine S Birken, Deborah L O'Connor, Kevin E Thorpe, Jonathon L Maguire, Whole milk compared with reduced-fat milk and childhood overweight: a systematic review and meta-analysis, The American Journal of Clinical Nutrition, Volume 111, Issue 2, February 2020, Pages 266–279, <https://doi.org/10.1093/ajcn/nqz276>

⁶ Shelley M Vanderhout, Mary Aglipay, Nazi Torabi, Peter Jüni, Bruno R da Costa, Catherine S Birken, Deborah L O'Connor, Kevin E Thorpe, Jonathon L Maguire, Whole milk compared with reduced-fat milk and childhood overweight: a systematic review and meta-analysis, The American Journal of Clinical Nutrition, Volume 111, Issue 2, February 2020, Pages 266–279, <https://doi.org/10.1093/ajcn/nqz276>

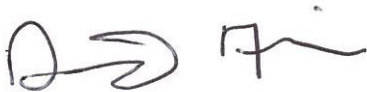
index.” The most recent Dietary Guidelines for Americans, which effectively prohibit availability of whole and 2% milk in schools are contradicted by these findings - likely promoting unhealthy nutritional habits. Whole and 2% milk options, including flavored options, are at least as healthy as skim and low-fat milk, and should be available to students to promote childhood nutrition through more consistent consumption of school milk.

In addition, NYFB would like to voice its support for the availability of a diversity of yogurt in school meals. Yogurt is a very nutrient rich dairy product that provides many of the same essential nutrients as milk and provides an additional means for school-aged children to consume important nutrients. Diversity in yogurts including traditional, Greek, Icelandic, Australian, drinkable offer different consumption options for children. In addition, yogurts can be particularly convenient for breakfast as well as to-go meals.

Lastly, we express concern regarding stricter sodium requirements within the NSLP and SBP. Many healthy food options, such as cheese, face feasibility and technical barriers when allowable sodium levels are reduced. Palatability, shelf life and general product functionality can be impacted by mandated shifts in underlying recipes. Further sodium restrictions should neither impede students’ access to nutritious food options like cheese nor make students unwilling to consume those items because of palatability changes. Local school districts should be given flexibility in how they meet the nutritional needs of their students without mandatory federal limits. NYFB commends USDA’s work to strengthen the health recommendations for our nation and is appreciative and thankful for the opportunity to comment on the Child Nutrition Programs Rule.

NYFB thanks you for the opportunity to share these comments and appreciate your thoughtful consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Fisher', with a stylized flourish at the end.

David Fisher
President, New York Farm Bureau