



Tel: 202-626-8700  
Fax: 202-626-8722  
50 F Street, NW Suite 900  
Washington, DC 20001  
www.ncfc.org

April 13, 2011

Julie Brewer, Chief  
Policy and Program Development Branch  
Child Nutrition Division, Food and Nutrition Service  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 640  
Alexandria, VA 22302-1594

**Re: Comments regarding USDA's Proposed Rule entitled, "Nutrition Standards in the National School Lunch and School Breakfast Programs" (RIN 0584-AD59, Docket Number FNS-2007-0038)**

Dear Ms. Brewer:

On behalf of the more than two million farmers and ranchers who belong to farmer cooperatives, the National Council of Farmer Cooperatives (NCFC) submits the following comments on the Proposed Rule revising and amending the standards for school meals entitled, "Nutrition Standards in the National School Lunch and School Breakfast Programs."

Since 1929, NCFC has been the voice of America's farmer cooperatives. Our members are regional and national farmer cooperatives, which are in turn composed of over 2,500 local farmer cooperatives across the country. NCFC members also include 26 state and regional councils of cooperatives.

America's farmer-owned cooperatives provide a comprehensive array of services for their members. These diverse organizations have a large stake in producing, handling, and processing our nation's food supply, and take pride in providing the safest, most abundant, most affordable, **and** most nutritious food in the world. As the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) contemplates new school meal guidelines, NCFC will continue to advocate for policy based on sound science, and as such, to increase consumption of all forms of fruits and vegetables; nuts; milk and milk products; whole grains; and meat.

**Fruits, Vegetables, and Nuts**

NCFC supports the emphasis the proposed rule puts on increased consumption of fruits and vegetables. This action tracks closely with the recommendations made by the Institute of Medicine's report, "School Meals: Building Blocks for Healthy Children," as well as the 2010 Dietary Guidelines for Americans. NCFC supports this effort, in

particular the recommendation that fruit be offered in all forms, including canned, dried, frozen, and fresh. The nutritional and health properties of fruits and vegetables are not distinguishable between fresh, frozen, canned or dried. Many of NCFC's members have ongoing research which shows equivalent, and in some cases increased nutritional benefits of canned, frozen, or dried fruits and vegetables over fresh. We applaud your efforts to increase consumption of all forms of fruits and vegetables in the school meal programs.

In several instances, the 2010 Dietary Guidelines for Americans encourage the use of canned, frozen, and dried fruits, as well as fresh fruits. The Dietary Guidelines do not include a specific restriction on sugars added to frozen fruit, but instead recognize that "sugars may be included up to the daily maximum limit" for all preparations. This recognizes the fact that there may be instances in which frozen fruit may need some sugar added to ensure product acceptability. In the proposed rule, a fruit component to a meal is defined as those that "are fresh; frozen without sugar; canned in light syrup, water or fruit juice; or dried." We encourage the meal guidelines to follow the lead of the Dietary Guidelines on this issue and allow sugars to be added to frozen fruit when necessary for product palatability.

NCFC is concerned with the provision in the proposed rule that would limit total servings of starchy vegetables—such as white potatoes, corn, lima beans, and green peas—to one cup per week in the National School Lunch Program and would eliminate these vegetables from the School Breakfast Program entirely. We believe there is compelling evidence that shows limiting starchy vegetables like potatoes will actually lead to a decrease in the nutritional content of school meals; lead to a decrease in overall vegetable consumption; and unnecessarily increase costs for school breakfasts and lunches. Further, potatoes are a good source of potassium and dietary fiber, two of the four nutrients of concern for Americans. As such, we urge FNS to allow starchy vegetables without limitation in school meals.

Additionally, NCFC recommends that USDA modify the timing of its commodity purchases to be more in line with industry production practices. Often, USDA's procurements do not correspond with fruit and vegetable harvest and processing schedules. We would ask USDA to adhere to timely contracting practices that coincide with ag production, so that a sufficient supply of fruits and vegetables can be packed in a timely manner.

## **Milk and Dairy Products**

The 2010 Dietary Guidelines for Americans speak to the nutritional benefits derived from consuming milk and milk products:

Milk and milk products contribute many nutrients, such as calcium, vitamin D (for products fortified with vitamin D), and potassium, to the diet. Moderate evidence shows that intake of milk and milk products is linked to improved bone health, especially in children and adolescents. Moderate evidence also indicates that

intake of milk and milk products is associated with a reduced risk of cardiovascular disease and type 2 diabetes and with lower blood pressure in adults.

Milk and dairy products offer a unique nutrient package that is important to the health of children and adolescents. Milk and dairy products are important sources of three major nutrients: calcium, potassium, and vitamin D. Given the fact that Americans consume less than 60 percent of the recommended intake for dairy foods, NCFE supports the continued recommendation to serve milk at both breakfast and lunch.

NCFE shares the concerns of our members who make cheese. Stringent sodium restrictions will limit their ability to provide natural cheese products to schools for the breakfast and lunch programs. In the broad picture, we know that there are many important nutrients in cheese and other dairy products. By reducing sodium to such strict levels, the proposed rule may inhibit the consumption of healthy natural cheese products in schools.

In conclusion, we share in your goal of providing school children with nutritious foods throughout the day, and farmer co-ops stand ready to help our nation's schools meet those challenges.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chuck F. Conner', written in a cursive style.

Chuck F. Conner  
President and CEO