



March 28, 2023

School Meals Policy Division
Food and Nutrition Service
P.O. Box 9233
Reston, VA 20195

RE: Docket FNS-2022-0043-0001

Dear Sir or Madam:

Dairy Council of California appreciates the opportunity to submit comments for consideration by the USDA Food and Nutrition Service regarding *Child Nutrition Programs: Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans*.

As a science-based nutrition organization, Dairy Council of California collaborates with partners to elevate the health of children and communities through the pursuit of lifelong healthy eating patterns. Funded by California's dairy farm families and milk processors and under the guidance of California Department of Food and Agriculture, Dairy Council of California's registered dietitian nutritionists and experts in nutrition science, education, agriculture literacy and community health engage with a variety of champions in school, health care, and community settings, working together to achieve nutrition security. Each year these collective efforts improve access to nutritious foods and provide nutrition education for millions of people in California, across the nation and beyond, demonstrating the dairy community's contribution to sustainable nutrition and community health.

Milk and Dairy Foods in Child Nutrition Programs Support Healthy Children and Communities

Child nutrition programs play an important role in improving nutrition security and supporting children's health and ability to learn. Research suggests that eating nutrient-dense foods like fruits, vegetables and dairy products that are made readily available in school meal programs is associated with improved academic and health outcomes among children and adolescents.¹

Milk is a required and vital part of school meals because it is nutrient-dense, affordable, easy to consume and highly palatable, and helps children and adolescents meet their daily nutrient needs. Many students do not consume the recommended number of daily servings of dairy so continuing to offer choices and reduce barriers to access while also



considering diet quality helps encourage consumption of milk and dairy foods in child nutrition programs.

Dairy Foods Improve the Quality of Children's Diets

Diet quality during childhood affects children's and adolescents' ability to succeed in school and life and impacts future health outcomes such as the likelihood of developing chronic diseases. Yet many students lack access to nutritious foods, nutrition education and support for optimal nutrition, which puts them at a disadvantage.

Evidence continues to show that dairy foods like milk, yogurt and cheese offer a unique package of essential nutrients that work together to provide multiple health benefits, including optimal growth and development in children and reduced risk of developing chronic diseases such as type 2 diabetes and heart disease.^{2,3} The wide variety of milk and dairy foods available provides many options to meet personal needs, tastes and preferences.

Though milk, yogurt and cheese supply essential nutrients to children's diets, by age 6 many children are not meeting the recommended daily servings from the Dairy food group.⁴ Consuming the recommended number of servings of dairy foods can help close the gap on some nutrient intakes, including essential nutrients such as calcium, vitamin D, potassium, magnesium and vitamin A.⁵

Flavored Milk Is a Nutritious Choice and Contributes to Nutrition Security

Research shows that offering flavored milk in school, increases overall milk consumption among children and adolescents, helping to meet intake recommendations.⁶ One recent large study of school-aged children and adolescents found that those who drank flavored milk consumed one extra serving of their recommended daily dairy servings compared to non-flavored milk drinkers, which contributed to higher intakes of calcium; potassium; magnesium; phosphorus; and vitamins A, D, B12 and B2 (riboflavin).⁷ Furthermore, studies show that children who consume flavored milk tend to have lower intake of soft drinks and fruit juice and have higher intake of protein, calcium and essential amino acids as compared with non-consumers of milk.⁸ These findings reinforce the nutritional contributions of flavored milk in children's eating patterns and the overall positive impact on diet quality.

The California dairy community has been proactive in reformulating flavored milk in schools over the years to significantly reduce added sugars in children's diets while still providing a nutrient-dense beverage that is enjoyable. Flavored milk offered in California



schools has been reformulated to reduce added sugars to within 7 to 8 grams, per reports from California school milk processors. Overall, flavored milk contributes only 4% of total added sugars in children’s diets⁹ but provides 13 essential nutrients, including calcium, vitamin D and potassium—nutrients that are under consumed by most school-aged children.

Flavored milk remains a popular choice in schools and, when served as a part of school meal programs, reduces the amount of milk waste.¹⁰ There are several examples of schools that have reported a reduction in milk consumption and an increase in food waste when flavored milk is removed as an option for students. In 2017, the Los Angeles Unified School District put flavored milk back on the menu when a pilot study found that offering chocolate milk as a choice reduced waste and increased consumption.¹¹

Offering flavored milk alongside other dairy foods contributes to nutrition security by providing nutrient-rich choices that are accessible, affordable, easy to consume and appealing to children. In addition, parents are generally supportive of flavored milk; in one survey, 85% of parents supported the inclusion of flavored milk in public school meals.¹²

Holistic and Inclusive Strategies Are Necessary to Improve Diet Quality and Optimal Health

Nutrients are not consumed in isolation, thus consideration of the health effects of whole foods is important in recommendations for healthy eating patterns. Research indicates that a focus on avoiding individual nutrients may lead to unintended consequences related to nutrient adequacy, diet quality and metabolic health.¹³ The American Academy of Pediatrics (AAP) supports the addition of small amounts of sugars to nutrient-dense foods like milk to increase consumption by children. AAP uses flavored milk as an example of the balance needed to limit added sugars while still promoting nutrient-rich foods.¹⁴

In addition to providing essential nutrients needed throughout life, dairy foods contain other diverse non-vitamin and non-mineral components, known as bioactive compounds, embedded within their unique food matrix. The dairy food matrix concept explains the health effects of whole dairy foods beyond their individual components that includes important health and functional benefits such as supporting growth and cognitive development, immune function, healthy gut microbiome, reduced risk of chronic diseases and more.¹⁵ It reinforces the importance of nutrition policy solutions to consider whole foods and their health effects, not just single nutrients such as sugar, sodium or fat.

A reductionist approach to nutrition guidance might have other unintended consequences. For example, eliminating added sugar from nutrient-dense foods might also lead to



increased consumption of artificially sweetened foods. Consumption of artificial sweeteners is increasing in all age groups, despite limited evidence of their safety for children and adolescents. The National Academy of Medicine, formerly called the Institute of Medicine, does not support consumption for this age group because artificially sweetened beverages have been shown to displace milk and 100% juice at mealtimes, and the AAP advises that artificial sweeteners should not play a significant role in children's diets due to limited research.¹⁶

Overall, dietary recommendations that shift from a reductionist approach targeting individual nutrients to an approach promoting healthy dietary patterns will consider the health effects of whole foods and can avoid unintended consequences of decreased access to nutrient-dense foods and their consumption.

Dairy Foods Support Sustainable Nutrition and Food Waste Reduction

School meal programs play a vital role in sustainable nutrition by ensuring wholesome, nutrient-dense foods are accessible, affordable and culturally relevant while also preserving environmental resources and supporting the health of children and adolescents. Finding realistic ways to encourage children to consume more nutritious foods while reducing the carbon footprint associated with food waste is a key step in addressing climate impacts.

Many schools are taking innovative approaches to reducing food waste while promoting the consumption of nutritious, locally sourced and sustainably produced foods as part of school meal programs. These efforts nudge students toward building healthy, sustainable eating patterns that can last a lifetime. Milk, yogurt and cheese are produced locally and sustainably, offer high-quality nutrition and appeal to students. Milk is a vital part of school meal programs because it is more than a beverage—it is a nutritious, whole food. A study conducted by the Rudd Center for Food Policy and Health at the University of Connecticut showed that on days when juice is available as a choice in high school lunches, students do not select whole fruit and milk as often. However, for adolescents whole fruit and milk are better sources of nutrients of concern—calcium, vitamin D, potassium and fiber.¹⁷ Preserving the position of milk in school meal programs is an important step to ensure nutritious foods fill students' stomachs instead of trash cans, a win-win for both health and the planet.

Recommendation

When determining school meal program requirements, Dairy Council of California recommends considering the health benefits of whole foods as the best way to support nutrition security of children and adolescents. Solutions that restrict single nutrients such



as added sugar or sodium without also focusing on impacts to overall diet quality could unintentionally limit access to and reduce consumption of nutritious foods like milk and dairy foods, which nourish children and support healthy communities. This approach is especially important as it relates to allowing flavored milk for students at all grade levels, since research shows consumption of milk and dairy foods starts declining at around the age of six. Milk and dairy foods, including flavored milk, are an important component of federal meal programs, providing key nutrients that improve overall diet quality and contribute to nutrition security, which is critical for children and families living in underserved communities. Milk, yogurt and cheese provide essential nutrients—calcium, vitamin D, potassium and more—that support optimal growth, bone health, overall health and academic achievement but are currently under consumed by most children and adolescents. Dairy Council of California strongly recommends school meal standards continue to make nutritious dairy foods readily available and accessible within school meal programs.

Thank you for the opportunity to submit these comments.

Regards,

A handwritten signature in blue ink that reads "Amy DeLisio".

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