



March 21, 2022

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

RE: Docket FNS-2020-0038-2936

Dear Ms. Tina Namian:

Dairy Council of California appreciates the opportunity to submit comments for consideration by the Food and Nutrition Service, USDA on the Child Nutrition Programs: Transitional Standards for Milk, Whole Grains, and Sodium.

For more than 100 years, Dairy Council of CA has empowered stakeholders to elevate the health of children and families through the pursuit of lifelong healthy eating habits. As a nutrition education organization 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 is comprised of registered dietitians, nutrition, agriculture literacy, and communication experts who engage with a variety of stakeholders in schools and community settings, working together to improve healthy eating patterns. These collective efforts result in educating and supporting millions of people in California and beyond each year, demonstrating the dairy community's contribution to sustainable nutrition and community health.

Diet quality during childhood affects children's ability to succeed in school and life, and it impacts future health outcomes such as the likelihood of developing a chronic disease. Yet many children in California lack access to nutrition education, nutritious foods and support for optimal nutrition, which puts them at a disadvantage. Child nutrition programs play an important role as a community solution for nutrition security, and this supports not only a child's health but their ability to learn as well. Research suggests that eating nutrient-dense foods that are made readily available in school meal programs—like fruits, vegetables and dairy products—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, helping children meet their daily nutrient needs; however, many students are not consuming the recommended number of daily servings of dairy. Continuing to offer choices and reducing barriers to access while also considering diet quality helps encourage consumption of milk and dairy foods in child nutrition programs.



Milk and Dairy Foods in Child Nutrition Programs are Critical to Supporting the Health of Children and Communities

Evidence continues to show that dairy foods like milk, yogurt and cheese offer a unique and essential package of 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.

Milk, cheese and yogurt are an important source of essential nutrients that contribute to overall health in children's eating patterns, but by age 6, most children are not meeting the recommended daily servings from the Dairy food group.⁴ Poor eating patterns, especially in early childhood and adolescence, can continue into adulthood, increasing the risk for becoming overweight and developing chronic conditions such as heart disease. Consuming the recommended amount of dairy foods can help close the gap on some nutrient intakes, including nutrients of concern such as calcium, vitamin D, magnesium and vitamin A.⁵

Evidence from longitudinal and experimental studies in school, childcare, and home settings demonstrate that offering flavored milk can increase overall milk consumption among children and adolescents.⁶ The American Academy of Pediatrics (AAP) Policy Statement on snacks, sweetened beverages, added sugars and schools supports the addition of small amounts of sugars to nutrient-dense foods like milk to increase consumption by children. The AAP uses flavored milk as an example of the balance needed to limit added sugars while still promoting nutrient-rich foods.⁷

The food matrix refers to the relationships between the nutrient and non-nutrient components of foods, including vitamins, minerals and bioactive components as well as physical structure, texture and form (e.g., solid, gel, liquid). The dairy food matrix provides a unique example of the advancement of research in this area, as dairy is a diverse group of foods that contain nutrients and bioactive components that vary in amount and macro- and micro-nutrient structure. The food matrix concept embraces the importance of considering whole foods, alongside the individual components they contain. This is particularly important in relation to public health policy. Dietary guidance should be based on an evaluation of the health effects of whole foods, including dairy, not just single nutrients such as sugar, sodium and fat.

Dairy Foods play a role in healthy, sustainable eating patterns

School meal programs play a vital role in sustainable nutrition, ensuring wholesome, nutrient-dense foods are accessible, affordable and culturally relevant while also preserving environmental resources and supporting the health of children. 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. In CA, these efforts have been put into action, with the state passing a policy that requires all cities and counties to



reduce the amount of compostable material that they send to landfills by 75% by the year 2025.⁸ Schools are proactively finding innovative ways to reduce food waste by promoting the consumption of nutritious and sustainably produced foods as part of school meals, nudging students towards building healthy, sustainable eating patterns that can last a lifetime. Milk, cheese and yogurt which are readily available through school meal programs are healthy and appealing to students, which means more nutritious foods in children’s stomachs instead of filling up trash cans. This is a win-win, supporting the health of children and the planet.

Recommendation: Dairy Council of California strongly recommends school meal standards consider the health effects of whole foods, alongside the individual components foods’ contain to enhance overall diet quality and support healthy dietary patterns. Dairy foods are an important component of school meals, providing key nutrients that contribute to nutrition security, especially for children and families living in under-served communities. Milk, cheese and yogurt provide essential nutrients—calcium, vitamin D and potassium—that support optimal growth, bone health and overall health, and academic achievement but are currently under-consumed by most children. Dietary recommendations and guidelines for the public that restrict single nutrients or food components without focusing on overall diet quality could unintentionally limit access to and consumption of nutritious foods like milk and dairy foods, which nourish children and communities. Finally, school meal programs play a vital role in building healthy, sustainable food systems as the foods made available offer different though complementary nutritional, social, economic, and environmental benefits. Focus should continue to be placed on prioritizing and supporting sustainable solutions that enable affordability, accessibility and consumption of nutritious foods such as milk and dairy, fresh fruit and vegetables, whole grains and high quality animal and plant-based proteins.

Thank you for the opportunity to submit these comments.

Regards,

A handwritten signature in black ink that reads "Ashley Rosales".

A handwritten signature in black ink that reads "Tammy Anderson-Wise".

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