National Milk Producers Federation

National Milk Producers Federation • 2101 Wilson Blvd., Arlington, VA 22201 • 703-243-6111 FAX 703-841-9328

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Virginia Stallings, M.D., Chair
Committee to Review National School Lunch and School
Breakfast Meal Patterns and Nutrient Standards
Institute of Medicine
The National Academies
500 Fifth Street, NW
Washington, DC 20001

ATTN: Heather Breiner

Dear Dr. Stallings:

The National Milk Producers Federation appreciates the opportunity to comment on the Preliminary Report of the IOM Food and Nutrition Board committee reviewing school meal patterns and nutrient standards. Based in Arlington, Va., the National Milk Producers Federation develops and carries out policies on behalf of the dairy producers and the dairy cooperatives they own. NMPF's member cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of more than 40,000 dairy producers.

School meals are central to providing adequate nutrition to children. As the committee's preliminary report notes, many children receive as much as half of their daily calories from school meals. The school breakfast program feeds 10 million children each day and the school lunch program feeds more than 30 million. Despite this, nutrition standards and meal requirements for these programs have not been updated in more than a decade. In the meantime there has been a flood of new nutritional guidance for children and child obesity has grown into an issue of national importance.

Jerry Kozak, President/Chief Executive Officer

The committee identified four principles for determining its recommendations and four criteria for school meal nutrition standards. The principles and criteria reflect a clear understanding of the challenges faced by school nutrition staffs as they attempt to provide meals that improve students' diets while also offering appealing foods and running a financially sound program. NMPF applauds the committee for taking this realistic approach to its task. Offering children healthier foods in school is pointless if those foods are not consumed.

Dairy foods can be very helpful in negotiating this challenging school meals environment. Milk, cheese and yogurt are nutrient-rich foods that offer good value while providing many key nutrients that children need. Equally important, dairy foods tend to be foods that children like.

Milk is a good or excellent source of nine essential nutrients: calcium, vitamin D, protein, potassium, vitamin A, vitamin B12, riboflavin, niacin and phosphorous. Dairy foods are a particularly important source of nutrition for children. Three of the key nutrients in dairy products—calcium, potassium and magnesium—are considered "nutrients of concern" because children don't get enough of them. According to the Agriculture Department, only slightly more than half of children ages one to eight have adequate calcium intakes. Adolescent girls are particularly calcium-deficient. Only nine percent of females 14 to 18 years old meet calcium recommendations.

Recognizing this, the American Academy of Pediatrics recommends that children four to eight years old drink three cups of low-fat or fat-free milk—or their equivalent—a day. It recommends that adolescents drink four 8-to-10-ounce glasses of milk per day. The 2005 Dietary Guidelines recommends three cups of fat-free or low-fat milk for physically active young children. Since so many children fall far short of their recommended daily intake of milk, school meals provide a critically important opportunity to close this gap. With milk a required component of meals, steps to improve school meals and boost student participation can help increase milk consumption and its attendant key nutrients.

According to USDA, school lunch participants consume four times more milk at lunch than nonparticipants (0.8 servings per day for participants, 0.2 servings for non-participants). Evaluations indicate that participating in both the school lunch and school breakfast programs significantly increases children's intakes of nutrients including calcium, phosphorus, vitamin D, vitamin A, magnesium, riboflavin and protein.

Cheese is another important dairy product that can help children meet their recommended daily nutrient requirements. Cheese is particularly popular among children and, like milk, is an excellent source of calcium. It is also a good source of high quality, easily digestible protein. For that reason, it is considered a meat alternative by the school lunch program. Adding cheese to vegetables, sandwiches and soups can also make foods from the other key food groups more appealing to children.

To its credit, the committee clearly recognized the important role of dairy products in children's diets. It identified milk and dairy products as foods "to be given special consideration" in its recommendations, and put milk and potassium on a list of foods and nutrients of concern for inadequate intake among all age and gender groups. Vitamin A was on the committee's list of nutrients of concern for all those nine and up and calcium was listed for all females ages nine and up. The committee noted that inadequate calcium intake can be "a notable health concern," contributing to bone fractures and osteoporosis later in life.

NMPF urges the committee to maintain its focus on the important role dairy products play in providing critical nutrients in children's diets and to keep this in mind as it develops its recommendations for future school meal patterns and nutrient standards. Since the majority of the nation's children do not consume the recommended number of servings from the milk group, efforts by the committee to encourage increased consumption of lowfat and nonfat milk and milk products would improve intake of key nutrients.

With respect to the types of milk consumed in schools, the good news is that approximately three-quarters of milk sold in schools today is either low-fat or fat-free, according to a National Dairy Council-School Nutrition Association review of data from USDA's School Nutrition Dietary Assessment III. This is a substantial change from the early 1990s, when less than 30 percent of milk sold in schools was low-fat or fat-free.

The emergence of flavored milk as a popular item among school children is another positive development because it demonstrates the effectiveness of using small amounts of added sugar to increase consumption of a nutrient-rich food. Flavored milk contains the same nutrients as white milk and is increasingly the milk of choice in schools. According to Agriculture Department data, in the 2004 school year, nearly two-thirds of all milk consumed in schools was flavored, and almost 90 percent of this was low-fat or fat-free.

Research has shown that focusing efforts on improving a product offering like flavored milk can help increase milk consumption and participation in school meal programs among children. A test conducted by the National Dairy Council and the School Nutrition Association showed that school milk consumption increased by 37 percent—and average daily participation in school meal programs increased by five percent— through simple improvement such as glass front coolers, colder temperatures and offering a variety of flavored milks in kid-friendly plastic containers.

While some have raised questions about flavored milk because of the small amount of added sugars, research shows that children who consume flavored milk do not have higher intakes of added sugars or total fat—or a higher Body Mass Index—than children who do

not consume favored milk. At the same time, these children do have higher total milk and calcium intakes.[1]

The Dietary Guidelines address the value of small amounts of added sugar in order to encourage consumption of foods that result in improved diets. They say that nutrient-rich foods, like dairy foods, that contain moderate amounts of added sugars can lead to improved diets. Likewise, the American Academy of Pediatrics, in a report on increasing children's bone health and calcium intakes, encouraged the consumption of beverages like low-fat or fat-free flavored milk.

NMPF urges the committee to take all these factors—the importance of school meals to children's diets, the value of nutrient-dense dairy products in those diets, and the emergency of flavored milk as a popular item that can increase milk consumption without contributing to higher intakes of sugar or fat—into consideration as it develops its recommendations for school meals programs.

Additionally, we feel it is important for the committee to focus on school meal patterns that evaluate nutrient content over the course of a week—rather than daily nutrient content—in developing its recommendations. Day-to-day variations are necessary for meal planning flexibility. It is the combination of foods over time that defines diet quality. Existing standards for school meals apply to meals over the course of a week, and this standard should be maintained to assure that schools are able to produce quality meals with sufficient variety to appeal to students.

We appreciate the committee's work to date, and we look forward to the group's continuing progress in addressing these issues.

Sincerely,

Robert D. Byrne

Robert D. Byrne, Ph. D.
Senior Vice President
Scientific and Regulatory Affairs

[1] Murphy M.M., Douglass J.S., Johnson R.K., and Spence L.A., Drinking flavored or plain milk is positively associated with nutrient intake and is not associated with adverse effects on weight status in U.S. children and adolescents. *Journal of the American Dietetic Association,* 2008;108:631-639.