



November 27, 2018

Documents Management Staff (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville MD 20852

FDA Docket No. FDA-2018-N-3522

Dear Documents Management Staff (HFA-305):

These comments are submitted on behalf of the 58,000 members of the School Nutrition Association (SNA) and in response to *the Use of the Names of Dairy Foods in the Labeling of Plant-Based Products*, Docket Number FDA-2018-N-3522 notice in the Federal Register on September 28, 2018. Our membership includes school nutrition professionals serving K-12 schools, college level academic instructors/professors in related fields, state agency personnel administering Federal child nutrition programs and other related professionals. SNA is responding to three (3) areas related to the questions you seek comments that are related to the school population. There are complexities to the nutrition standards and regulatory environment of school meal operations that must be met for student meals. With oversight from the US Department of Agriculture (USDA), there are various memoranda and related documents defining the meal pattern's food components and application to the school meals program, including but not limited to dairy foods. SNA recommends conferring with the Food and Nutrition Service at USDA for related information to this notice.

Regarding the request for comments on *Consumer Understanding, Perception, Purchase and Consumption of Plant-Based Products, Particularly Those Manufactured to Resemble Dairy Foods such as Milk, Cultured Milk, Yogurt and Cheese*, schools are consistent with the consumer marketplace in observing confusion among products due primarily to packaging and naming similarities. Due to the trends in the packaging of these plant-based beverages and their frequent placement in the same display cases as dairy milk and other dairy products, there needs to be clear identification and labeling to identify products. Some packaging identifies the product as a 'milk beverage' while others use the term 'milk,' which based on the current standard and consumer understanding of milk, is misleading. Consumers need significant education on the differences of these products in order to be equipped to distinguish between

them. A key place for that consumer education lies in labeling these products as plant-based beverages.

These challenges for consumers transfers to the school environment making the *Consumer Understanding Regarding the Basic Nature, Characteristics and Properties of Plant-Based Products* difficult for school nutrition professionals as they try to explain the differences when addressing menu substitutions for food allergies or offering separate a la carte items. Although not a beverage referenced within this notice, an example is that there has been considerable need for education on the difference between orange juice and orange juice like beverages. Similarly, dairy milk and many of these plant-based products may be used interchangeably yet the basic nature and characteristics are different. Many consumers (parents and students) in our environment do not see the difference. They are not aware of the chemical make up, nor whether there has been fortification. While there are instances where substitutions are necessary, as in allergies, many simply aren't aware of the nutritional differences among the beverage options. As with other foods that are part of the *Dietary Guidelines for Americans*, it is important that these plant-based beverages and foods are accurately identified to provide consumers with information that would limit confusion.

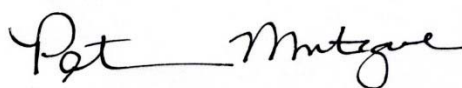
The third area looking for comments, *Consumer Understanding of the Nutritional Content of Plant-Based Products and Dairy Foods and the Effect, if any, on Consumer Purchases and Use*, the consumer in the school environment has similar issues as the general consumer except in school nutrition programs there are specific nutrition standards required with the menu offerings. When a parent or guardian contacts the school nutrition department regarding a food allergy, often the school nutrition professional is educating the parent on the nutritional content of a beverage and food substitutions. School nutrition professionals serve students with lactose intolerances, milk allergies and other dietary needs and it is critical that the student and parent/guardian understand their options. Conveying that information relative to the school setting also raises a need to be informed and educated as a general consumer.

In conclusions, nutrients in dairy milk, such as calcium and Vitamin D are valuable for the growth and development of school age children. The nutrient value of dairy milk and plant-based beverages is not equivalent. Consumers should know the difference and have a clear standard of identity. Consumer education that provides clear information is necessary. As new products get introduced into the general consumer marketplace, they eventually appear in the school nutrition environment. Being explicit in a standard of identity and having clear labeling would assist students in a multitude of food environments to make informed healthful eating choices.

Sincerely,



Gay Anderson, SNS
President



Patricia Montague, CAE
Chief Executive Officer