



# National Milk Producers Federation

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January 22, 2024

Dockets Management Staff (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

## **Re: FDA-2023-N-3849- Virtual Public Meeting and Listening Sessions on Strategies to Reduce Added Sugars Consumption in the United States**

Dear Sir or Madam:

The National Milk Producers Federation (NMPF) supports the goals of increasing the healthfulness of Americans' diets, strengthening nutrition security for all, and improving diet-related health across the United States. We appreciated the opportunity to share comments at the listening session held by the Food and Drug Administration (FDA) in November regarding reducing added sugars in the food supply, and we appreciate the opportunity to share our views here as well. The dairy industry has an impressive record of proactively and voluntarily reducing added sugars in dairy foods, especially in flavored school milk. NMPF, as well as leaders in medical and health fields, also recognize the important role modest amounts of added sugars can play in increasing nutrient intake – by improving palatability, small amounts of added sugars can encourage the consumption of nutrient-dense foods, especially among children.

NMPF was organized in 1916 to provide a forum for dairy producers and the cooperatives they own to participate in public policy discussions. NMPF advocates policies to Congress, U.S. and foreign government agencies, industry organizations, the news media, and the public. NMPF addresses policies concerning milk pricing, domestic and international market development, agriculture credit and taxation, environmental issues, nutrition, food safety and health, animal welfare, product standards and labeling, and research and biotechnology.

### **Case Success: Voluntary Reduction of Added Sugars in Flavored Milk Benefits Child Nutrition**

The dairy industry, over the past 15 years, has proactively reformulated flavored school milks to reduce added sugars. Working with local school districts, milk processors voluntarily reduced the calories and added sugar content of flavored school milk. Between the 2006-2007 and 2020-2021

school years, average added sugar levels declined by 57 percent, from 16.7 grams to 8.2 grams in an 8-fluid ounce serving. The current average added sugars in flavored school milk is even lower – now at 7.6 grams per 8-ounce serving – falling well below USDA’s proposed product-specific added-sugar limit of 10 grams per 8-fluid ounce serving.<sup>1,2</sup> The flavored milk served in schools currently averages 126 calories, just 29 more than unflavored milk.<sup>3</sup> In fact, flavored milk consumption has been found, in or out of schools, to only make up 4% of the added sugars in children’s diets.<sup>4</sup>

The dairy industry’s proactive, voluntary reduction of added sugars in school milk demonstrates the power of industry-led initiatives in this area. Industry leaders came together around reducing added sugars, investing the time, energy, and resources to reformulate products into healthier options that people still enjoy. What’s more, the research and expertise for reformulation lives and grows within food industry R & D departments, where best practices are developed and shared, and flavor and nutrition breakthroughs are developed conjointly.

Dairy’s successful efforts to reduce added sugars in flavored school milk has had a positive impact on students’ nutrient intake. Flavored school milk, now with less added sugars than ever before, remains the most popular option in schools,<sup>5</sup> encouraging student consumption of milk’s 13 essential nutrients. A large study of children, ages 2 to 18 years old, found that flavored milk drinkers consumed about one additional serving of dairy daily, which contributed to higher intake of calcium, potassium, magnesium, phosphorus and vitamins A, D, B12 and riboflavin (B2) compared to non-flavored milk drinkers.<sup>6</sup> Furthermore, research demonstrates an association between flavored milk in schools and overall student participation in school meal programs, meaning that more students are benefiting from the nutrients provided in the entire meal when flavored milk is an option.<sup>7,8</sup>

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<sup>1</sup> Prime Consulting. All Channel Tracking: The Projection of Milk Volume by Sales Channel, 2022 Edition. June 2023.

<sup>2</sup> USDA. Child Nutrition Programs: Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans. Proposed Rule. Published February, 2023.  
<https://www.federalregister.gov/documents/2023/02/07/2023-02102/child-nutrition-programs-revisions-to-meal-patterns-consistent-with-the-2020-dietary-guidelines-for>

<sup>3</sup> Prime Consulting. All Channel Tracking: The Projection of Milk Volume by Sales Channel, 2022 Edition. June 2023.

<sup>4</sup> Dairy Research Institute®, NHANES 2007-2010. (Nutrition Impact, LLC analysis. Ages 2+ years). Data Source: U.S. Department of Agriculture, Agricultural Research Service. 2013.

<sup>5</sup> Prime Consulting. All Channel Tracking: The Projection of Milk Volume by Sales Channel, 2022 Edition. June 2023.

<sup>6</sup> Nicklas, T. A., O’Neil, C. E., & Fulgoni, V. L. (2013). The Nutritional Role of Flavored and White Milk in the Diets of Children. *Journal of School Health*, 83(10), 728–733. <https://doi.org/10.1111/JOSH.12087>

<sup>7</sup> Quann, Erin E. PhD, RD; Adams, Doug MBA. Impact on Milk Consumption and Nutrient Intakes From Eliminating Flavored Milk in Elementary Schools. *Nutrition Today* 48(3):p 127-134, May/June 2013. | DOI: 10.1097/NT.0b013e3182941d6a.

<sup>8</sup> Hanks, A., Just, D., & Wansink, B. (2012). A source of contention or nutrition: an assessment of removing flavored milk from school lunchrooms. *Journal of Nutrition Education and Behavior*, 44(4), S21.

## **Modest Amounts of Added Sugar May Boost Nutrient Intake**

While NMPF agrees that there is an opportunity to decrease the amount of added sugars in the food supply, we must avoid taking an extreme approach that may inadvertently discourage Americans from consuming the very nutrients they need for healthy lives. Instead, the approach must be balanced, looking to reduce added sugars while still considering Americans' nutrient intake needs.

Modest amounts of added sugar are often used to effectively increase the consumption of nutritious foods. In fact, the Dietary Guidelines for Americans (DGA) has explored this balanced approach to healthful eating multiple times. First, expressing the benefits of added sugars, saturated fat, or sodium, the 2020-2025 DGA states that “[a] small amount of added sugars, saturated fat, or sodium can be added to nutrient-dense foods and beverages to help meet food group recommendations...”<sup>9</sup> Recognizing that reducing added sugars is an important component for improving overall health, we cannot lose sight of the fact that another essential factor is improving nutrient intake. Small amounts of added sugars is not only an effective tool, as explored in the DGA, but is also a tool recommended by health and medical organizations. The American Academy of Pediatrics and the American Heart Association have both noted that using small amounts of added sugars has effectively increased vital nutrient intakes in a way that improves overall diet quality without increasing calories to unhealthy levels.<sup>10, 11</sup> Similarly, the Academy of Nutrition and Dietetics used flavored milk as an example of an “effective tool” to help improve kids’ diets, sharing “studies have demonstrated that school-aged children who drink flavored milk meet more of their nutrient needs, do not consume more added sugar, fat, or calories, and are similar in weight to non-milk drinkers.”<sup>12</sup>

Striking this balance of reducing excess added sugars while still encouraging the consumption of key nutrients will be critical in our collective effort to improve nutrition security and diet-related health in a realistic and therefore effective way.

NMPF implores FDA to work with industry to craft an effective approach to reducing added sugars that harnesses industry’s expertise and successful experience and incorporates nutrient intake consideration. History demonstrates that extreme approaches do not work. We must take a collective and balanced approach to

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<sup>9</sup>U.S. Department of Agriculture and U.S. Department of Health and Human Services. Dietary Guidelines for Americans, 2020-2025. 9th Edition. Pg X. Pg 18.

<sup>10</sup> American Academy of Pediatrics Council on School Health and Committee on Nutrition. *Snacks, Sweetened Beverages, Added Sugars, and Schools*. March 2015.

<sup>11</sup> American Heart Association. *Added Sugars and Cardiovascular Disease Risk in Children: A Scientific Statement From the American Heart Association*. May 2017.

<sup>12</sup> Academy of Nutrition and Dietetics. Public Comments on *Docket No. FNS-2017-0021*. January 29, 2019.

achieve our shared goals of strengthening nutrition security for all and improving diet-related health across the United States.

Sincerely,

A handwritten signature in black ink, reading "Miquela Hanselman". The signature is written in a cursive, flowing style with a large initial "M".

Miquela Hanselman, MPH  
Director, Regulatory Affairs