

April 4, 2013

Julie Brewer

Chief, Policy and Program Development Branch, Child Nutrition Division

Food and Nutrition Service, U.S. Department of Agriculture

P.O. Box 66874

Saint Louis, MO 63166.

Docket ID: [FNS-2011-0019](#)

Re: National School Lunch Program and School Breakfast Program: Nutrition Standards for All Foods Sold in School as Required by the Healthy, Hunger-Free Kids Act of 2010

Dear Ms. Brewer:

We strongly support the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS) proposed rule for nutrition standards for all food sold in school and respectfully submit the following comments for your consideration.

Real Food for Kids – Montgomery (RFKM) is a grass-roots, parent advocacy group promoting whole, delicious, fresh foods in the Montgomery County Public School system (MCPS) in Montgomery County, Maryland. RFKM currently has over 110 parents representing 51 schools in our membership, along with over 170 more interested stakeholders from our community. We were formed in October of 2012 by a group of parents concerned about the food offerings in our top-rated school system, the largest in Maryland, and one of the 20 largest in the country with 202 schools and almost 150,000 students.

Our members include: doctors, nurses, dieticians, nutritionists, health coaches, certified personal trainers, chefs, health policy professionals, food service professionals, PhD college professors, business owners/entrepreneurs in the field of healthy food, writers, educators, and musicians.

Since the guidelines for competitive school food were last updated almost 33 years ago, we feel it is extremely important that our concerns be heard and considered.

Thank you for allowing us to submit our comments on this important issue.

Sincerely,

Karen Devitt and Lindsey Parsons

Co-Founders

Real Food For Kids - Montgomery

We support the National Alliance for Nutrition and Activity (NANA) recommendations for the final regulations for competitive foods with the addition of the following points (some of which are taken from positions we share with the New York Coalition for Healthy School Food):

Just because a food label is low in fat, sugar, or sodium does not make it healthy. The food industry will create processed foods that meet these requirements, and that doesn't make them healthy. Fruits, veggies, and whole grain products that meet the nutrition standards should be made available and are encouraged to be made available under the new rule.

Dairy is not a health food. Even if it's low fat, there are problems with milk protein, and most of the world's population can't digest milk sugars, especially persons of color. Non-dairy milks should be required to be offered and available for any students to purchase. 60% of the world's population is lactose intolerant, especially persons of color. Children end up with belly aches and discomfort and find it hard to study, and don't even know it's caused by something they may consume at every meal and oftentimes for snacks. A non-dairy equivalent should regularly be available to all students. The dairy recommendations in the regulations are a result of dairy industry lobbying, and are not based on what is best for health. For years, research has proven that dairy does not result in stronger bones and as a result the FDA no longer allows the dairy industry to advertise that milk/dairy builds strong bones.

Exemptions for fat should be made for nuts or nut butters without added fats or sugars, but should not be made for reduced fat cheeses (which are actually high in fat).

It appears that high schools would be allowed to offer beverages containing artificial sweeteners. Beverages allowed in high schools should not be allowed to contain artificial sweeteners. These ingredients do not support good health and would appear to be allowed only to appease the beverage industry. In addition, because sodas containing sweeteners will no longer be allowed, this will result in many high school students now consuming artificial sweeteners that previously they did not. According to Harvard Medical School, problems associated with artificial sweeteners include fooling the body by over stimulating the sugar receptors and changing how food tastes – and making healthy nutritive foods seem less sweet and satisfying, thus causing users to seek out other sugar-laden foods. While students may not be able to access such foods at school, they may then go home and make up the difference there.

We ask that 100% of grains be required to be Whole Grain, not "Whole Grain Rich". "Whole grain rich" means that only 50% of grains must be whole grain. We should not be offering refined grains to students in school. The "whole grain rich" recommendation is due to grain industry lobbying and is not based on what is best for health. In addition, we believe that all whole grain products served in the schools should be at minimum, stone-ground, as the finer the grind of a whole grain, the higher the glycemic index and the attendant problems.

Eliminate all artificial ingredients: artificial colors, artificial flavors, preservatives, artificial sweeteners, and high fructose corn syrup. These ingredients are the hallmarks of processed foods. They do nothing

to contribute to health, and their main purpose is for corporate profit - replacing the color and flavor lost by processing foods, allowing them to be shelf stable for long periods of time, trick customers into thinking they will be aided in losing weight, and providing a cheap sweetener, respectively.

In addition, the following are concerns in areas where we feel the proposed standards fall short and which are not covered in the comments either from NANA or the New York Coalition for Healthy School Food.

**Sugar.** Because of the health risks associated with sugar intake and the addictive properties of sugar, we believe the sugar guidelines should be stronger than proposed. Sugar consumption per capita in the United States has quintupled in the last 20 years. The American Heart Association recommends no more than 20 g of added sugar for children and adolescent girls – per day. For adolescent boys, the recommended amount is 33 g of added sugar per day.

**Sugar in milk products.** Sugar added to milk is not addressed at all in the proposed guidelines. Our school system sells 2 types of flavored milk, chocolate and strawberry. Both of these products contain added sugar for a total sugar content of 21/22 g per 8 oz serving – more sugar than a chocolate bar contains. This computes to an **added** sugar content of 7/8 g, or almost 2 teaspoons of added sugar per 8 oz serving (milk has 13 g of sugar naturally per 8 oz serving). We believe milk with added sugar should be eliminated from school lunchrooms. The out-dated argument that children won't drink their milk unless it is sugared is like giving a child a candy bar if s/he won't eat their broccoli. Sugar interferes with the absorption of calcium and magnesium. If a young girl in our school system has one strawberry flavored milk for breakfast and another one for lunch (a very likely scenario), she has ingested 44 g of total sugar (16 g of added sugar), almost exceeding the daily recommendation (20 g) in just these 2 items alone.

Our position: We believe sugared milk should be eliminated from school lunchrooms.

**Sugar in yogurt.** The proposed guideline is for 30 g of sugar in 8 oz of yogurt. This allows for added sugars in the range of 18-21 grams, or 4-5 teaspoons per 8 oz serving. (Yogurt naturally has 9-12 grams of sugar, depending on the brand.) Common sense would tell you that this is excessive. If an adolescent boy in our school system has a chocolate milk and a serving of yogurt for lunch, he will have ingested 25-28 g of added sugar, almost exceeding the daily recommendation (33 g) in just these 2 items alone. Yogurts with added sugars also tend to be highly processed, with ingredients such as high fructose corn syrup, artificial flavors and colors. We support the practice of unsweetened, unflavored yogurt, with real fresh fruit as a sweetener.

Our position: We recommend no more than 20g of total sugar per 8 oz serving of yogurt.

**Sugar and calories in 100 % juice products.** Modern technology has unleashed a new type of product created by blending various fruit and vegetable concentrates. These products are closer to soda than produce, providing none of the nutritive value that a piece of fruit or a serving of vegetables would provide. Our school system sells a number of these products which are excessively high in sugar content and calories. For example, one fruit and vegetable blend contains 31 g of sugar and 140 calories, more

sugar and calories than an equivalent amount of soda. One would have to eat about 2½ pounds of fruits and vegetables to ingest this amount of sugar naturally. When fruits and vegetables are served in a juiced or pureed format, the fiber is either removed or pureed to the point that it no longer slows the absorption of the sugar, making these drinks once again a concern in terms of the rapid intake and absorption of sugar.

Our position: Sugar and calorie content in 100% juice products needs to be as strictly regulated as in other sweetened beverage products.

**Oversight and Accountability.** Oversight and accountability should be the responsibility of an office or individual outside of the food services division. In our top-rated school system, a product has been sold for a number of years that far exceeds (by a factor of 4) the calories allowed by the state guidelines. RFKM brought this violation to the attention of the Division of Food and Nutrition Services (DFNS) in October of 2012 with a request that the product be removed. As far as we know, this product is still being sold in direct violation of standards. Oversight and accountability is lax, if nonexistent. There should be a mechanism for reporting violations, such as a toll-free number or web site required to be distributed to parents yearly and posted in the school cafeteria so that schools are held accountable to these standards and know that there will be consequences if they do not adhere to them.

**Communication and Transparency.** Ingredient lists and nutrition labels/facts should be made available to parents for all menu items. A list of all a la carte and vending items for sale should be made available to parents, as well as ingredients and nutrition labels/facts for those items. This information should be made available on the school or school system's website.

**Artificial Ingredients/Chemical additives.** No mention is made in the guidelines of chemical additives. We strongly recommend that the following additives be banned from food sold in schools to children: Artificial color, Artificial flavor, Artificial sweeteners, MSG and MSG-relatives, and the 3 petroleum-based preservatives: BHA, BHT, and TBHQ. There are dozens of studies linking these additives to physical, behavioral and cognitive problems in children. (See references below.) The four childhood diseases of Allergies, ADHD, Asthma, and Autism have exploded to near epidemic proportions in the last 20 years. Diet has been linked to these problems in numerous studies. As the New York Coalition for Healthy School Food states above – “artificial colors, artificial flavors, preservatives, artificial sweeteners, and high fructose corn syrup... are the hallmarks of processed foods. They do nothing to contribute to health, and their main purpose is for corporate profit - replacing the color and flavor lost by processing foods, allowing them to be shelf stable for long periods of time, trick customers into thinking they will be aided in losing weight, and providing a cheap sweetener, respectively.”

## REFERENCES

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