



Sustainable Food Policy Alliance
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March 24, 2022

Food and Nutrition Service (FNS)
U.S. Department of Agriculture
P.O. Box 2885
Alexandria, Virginia 22302

Re: Docket FNS-2020-0038, Food and Nutrition Service Request for Comments on “Child Nutrition Programs: Transitional Standards for Milk, Whole Grains, and Sodium”

Dear Administrator Long:

The Sustainable Food Policy Alliance (SFPA) is pleased to submit comments on considerations for future rulemaking related to the School Nutrition Program in response to the Food and Nutrition Service request for comments on “Child Nutrition Programs: Transitional Standards for Milk, Whole Grains, and Sodium.”

SFPA member companies, Danone North America; Mars, Incorporated; Nestlé USA; and Unilever United States, make foods that support healthy, balanced lives. We believe that food companies have a responsibility to support and improve public health, and that doing so requires leadership not only from the food industry but through a food systems approach, including the administration of school lunch programs by the U.S. government.

As four of the nation’s largest food companies, we support National School Lunch and Breakfast Programs that provide children access to nutritious food, setting them up for a lifetime of making healthful dietary choices.

The importance of these and other nutrition assistance programs has been spotlighted by the COVID-19 pandemic. USDA’s school lunch program quickly adapted to ensure that all children had enough to eat as schools shut down and supply chains were disrupted. Flexibility across the program was necessary to ensure children were fed both while schools were closed and as students returned to the classroom.

Going forward, we must ensure continued access for children to school meals that reflect nutritional standards aligned with the current U.S. Dietary Guidelines for Americans (DGAs).



SFPA agrees with leading public health and nutrition stakeholders that the National School Lunch and Breakfast Programs should:

- Expand and ensure year-round access to school meals while maintaining strong nutrition requirements;
- Enhance access to school nutrition programs while maintaining strong nutrition requirements and make COVID-19 waivers permanent (e.g., eliminate congregate requirement);
- Increase overall funding for school breakfasts;
- Implement evidence-based nutrition standards in the most recent Dietary Guidelines for Americans (DGAs) in school meals and other foods sold in schools;
- Support and provide adequate funds to ensure students receive comprehensive and culturally appropriate health and nutrition education that addresses such things as appropriate portion sizes and choosing nutrient-dense foods, and is based on the most current recommendations in the DGAs; and
- Provide technical assistance, capital funds, financial support and other resources to aid schools in developing menus, adequately storing nutritious foods and cooking and serving meals that meet nutritional standards and act to ensure the supply chain can deliver. School policies and programs should provide ample time for children and adolescents to consume their meals. And schools should have resources to teach students about their nutritional needs and how to meet them over the course of a lifetime.

We appreciate the opportunity to submit these comments regarding the National School Lunch and Breakfast Programs. We hope that you will consider the SFPA as a resource as you move forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Adamo".

Chris Adamo
Vice President
Federal and Industry Affairs
Danone North America, PBC

A handwritten signature in blue ink, appearing to read "Peter Rowan".

Peter Rowan
Vice President
U.S. Public Affairs
Mars, Incorporated



Molly Fogarty

Molly Fogarty
Senior Vice President
Corporate & Government Affairs, U.S.
Nestlé USA

Tom Langan

Tom Langan
North America Director
Sustainable Business & External Affairs
Unilever



MARS

