



April 9, 2013

The Honorable Thomas Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

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 Secretary Vilsack:

We, the undersigned members of the National Alliance for Nutrition and Activity, appreciate the U.S. Department of Agriculture's (USDA) work to update the nutrition standards for snacks and beverages sold in schools through a la carte, vending machines, school stores, and on-campus fundraisers (also known as competitive foods).

Overall, we strongly support the "Smart Snacks in Schools" proposed rule. While there has been some progress in improving the nutritional quality of competitive foods due to state and local policies and voluntary action, nutritionally poor foods and beverages are still widely available in schools. Given that, as well as the high childhood obesity rates, it is imperative that competitive foods and beverages be held to comprehensive, science-based nutrition standards nationally.

We strongly support the following for the final rule:

- The standards should apply to snacks and beverages sold in schools, across the school campus, and throughout the school day (until at least 30 minutes after the last class ends).
- Foods sold in schools should meet strong standards for calories, fats, sugars, and salt, as well as provide to students a positive nutritional benefit, such as be a fruit, vegetable, or whole grain, or naturally contain meaningful amounts of a nutrient of public health concern (i.e., calcium, potassium, vitamin D, or dietary fiber).

- We support Alternative C1 for the sugars standard, allowing no more than 35 percent of calories from total sugars in foods, as recommended by the Institute of Medicine.
- All foods sold in school cafeterias should meet the standards, with no loopholes for any items sold a la carte.
- The standards should be applied to foods and beverages as they are packaged and sold to children (i.e., one bag of chips should count as one serving).
- Sugary drinks, like full-calorie sodas, should not be sold in schools. We urge USDA to exclude full-calorie sports drinks, which also get all their calories from sugars.
- Calorie limits should be tiered with grade level, similar to the reimbursable meal programs. A kindergartner needs fewer calories than a high school student.
- Schools should make potable water readily accessible to children at no charge during the school lunch and breakfast meal service.

National nutrition standards for food sold outside of school meals are needed to protect the integrity of the school lunch program and the health of all children in all states. Studies show that unhealthy foods and beverages sold through vending machines, a la carte, and other venues outside of school meals have a negative effect on students' diets and weights. They also undercut the national investment and participation in the school meal programs.

Selling unhealthy foods and beverages in schools also undermines nutrition education and sends children the message that good nutrition is unimportant. It reduces parents' ability to help their children eat healthfully. Parents want improved school foods; 80 percent of voters believe that schools should be required to meet higher nutrition standards for all foods sold to students.

We applaud USDA for proposing this much-needed update to the national nutrition standards for snacks and beverages sold in schools and urge the agency to act expeditiously to finalize and fully implement a strong final rule. We urge you to build on your proposal and strengthen it to ensure that all foods and beverages sold in schools meet strong nutrition standards to help safeguard and support the health of all school children.

Respectfully,

Active Living By Design

Alabama Dietetic Association

Ad Lucem Consulting

American Academy of Pediatrics

Advocates for Children & Youth (MD)

American Academy of Sports Dietitians
and Nutritionists

Advocates for Children of New Jersey

American Alliance for Health, Physical Education, Recreation, and Dance

American Association for Health Education

American Cancer Society Cancer Action Network

American Council on Exercise

American Diabetes Association

American Heart Association

American Institute for Cancer Research

Association of State & Territorial Health Officials

Association of State & Territorial Public Health Nutrition Directors

California Association of Nutrition & Activity Programs (CAN-Act)

California Center for Public Health Advocacy

California Food Policy Advocates

California Project LEAN of the Public Health Institute

Center for Communications, Health & the Environment

Center for Science in the Public Interest

ChangeLab Solutions

Childhood Obesity Prevention Coalition (WA)

Children's Alliance (WA)

Colorado Children's Campaign

Community Food and Justice Coalition (CA)

Consortium to Lower Obesity in Chicago Children

Consumer Federation of America

Earth Day Network

Defeat Diabetes Foundation

Directors of Health Promotion and Education

Eat Smart, Move More South Carolina

Farm Sanctuary

First Focus

Food & Water Watch

The Food Trust

Hattie Mae & PALS Foundation

Illinois Alliance to Prevent Obesity

Illinois Public Health Institute

The Kids' Safe and Healthful Foods Project

Lane Coalition for Healthy Active Youth (OR)

LiveWell Colorado

Maine Children's Alliance

Minnesota Cancer Alliance

MomsRising.org

National Action Against Obesity	Public Health Institute
National Association for Sport and Physical Education	Physicians Committee for Responsible Medicine
National Association of County and City Health Officials	Real Food For Kids – Fairfax (VA)
National Association of School Nurses	Real Food For Kids – Montgomery (VA)
National Congress of Black Women	Shape Up America!
National Consumers League	Small Planet Institute
National Education Association Health Information Network	Society for Nutrition Education and Behavior
National Initiative for Children’s Healthcare Quality	South Carolina Appleseed Legal Justice Center
National PTA	Texans Care for Children
National Research Center for Women & Families	Trust for America’s Health
National WIC Association	Voices for America’s Children
New Mexico Voices for Children	Voices for Utah Children
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