



October 21, 2013

William Wagoner
Section Chief, Policy and Program Development Branch
Child Nutrition Division, Food and Nutrition Service, U.S. Department of Agriculture
P.O. Box 66874
St. 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 Interim Final Rule

Dear Mr. Wagoner:

The Society for Nutrition Education and Behavior (SNEB) strongly supports the U.S. Department of Agriculture's (USDA) interim final rule addressing nutrition standards for all foods and beverages sold in schools. This rule not only reflects the latest nutrition science, but also echoes the nearly 250,000 comments USDA received from around the country in support of strong nutrition standards for snacks and beverages sold in schools. In addition to the overwhelming support demonstrated during the comment period, a 2012 poll conducted by the Kids' Safe and Healthful Foods Project shows that 80 percent of parents are concerned about child obesity, with more than 50 percent being very concerned. This same poll reveals that 80 percent of parents support setting national standards for snacks and a la carte foods and beverages.¹

This is the first update to nutrition standards for school snack foods and beverages in more than 30 years. With the tripling of childhood obesity rates in the past three decades, and a high number of Americans at risk for obesity-related health issues, such as heart disease, depression, high blood pressure, type 2 diabetes, breathing problems, sleep disorders, and high cholesterol, these updates could not come at a more important time.^{2,3,4,5,6,7} Recent improvements to nutrition standards for school meals have resulted in healthier breakfasts and lunches being served to students around the country. However, less-healthy items, like sugary drinks, salty snacks, and candy, are still widely available through vending machines, snack bars, school stores, and a la carte lines.^{8,9,10,11} Research shows that roughly 40 percent of students buy a snack at school each day, and even if students eat a healthy lunch, they often consume excess calories from these added snacks and beverages.¹² Given the wide discrepancy that exists among state and district nutrition standards for snacks, the changes resulting from this rule have the potential to make a meaningful impact by ensuring that no matter where a child goes to school, all of his or her snack options will be healthy ones.^{13,14}

We commend USDA for issuing a strong, science-based interim final rule in such a timely manner. Specifically, we support:

- Applying the rule to all foods and beverages sold throughout the school day (until at least 30 minutes after school ends) and across the entire campus;
- Requiring all foods sold in schools to meet standards for calories, fats, sugars, and salt;
- Requiring all foods sold outside of meals to contribute positively to children's diets by being a fruit, vegetable, whole grain, low-fat dairy, or protein food;



- Applying the standards to foods and beverages as packaged and sold to children; and
- Requiring schools to make potable water readily accessible to children at no charge during the meal service.

We would prefer that all foods sold in schools meet these criteria, including all items sold a la carte in the cafeteria, regardless of whether they are sold stand-alone or as part of a regular school meal. We strongly urge the Department not to expand the a la carte exception for any additional items, such as side dishes, sold as part of the meal program. Allowing sales of any foods that are inconsistent with the competitive foods standards undermines the efforts of parents to provide healthy food options to children and undermines the rule itself. We urge USDA to closely monitor the exemption for entrée items sold as part of a school meal to determine the overall nutrient profile of the products being offered under the exemption.

We strongly support the elimination of all sugar-sweetened beverages (SSBs) from elementary schools and middle schools. While we would prefer a limit of no more than 40 calories per container for low- and mid-calorie drinks sold in high schools, we urge USDA not to weaken the final rule by allowing beverages in high schools with more than 40 calories per 8 ounce serving or 60 calories per 12 ounce serving.

Many schools across the country have already implemented strong standards for snacks, and are primed and ready for full implementation of the rule. We urge USDA to ensure that successful strategies from schools participating in the HealthierUS School Challenge or as part of the Alliance for a Healthier Generation's Healthy Schools Program can be shared with all schools to help in their transition. We strongly support implementing this interim final rule in the fall of 2014.

In conclusion, SNEB commends USDA for proposing strong standards that promote students' consumption of healthy foods, such as fruits, vegetables, whole grains, and nonfat and low-fat dairy products, as well as limiting calories, fats, sugars, and sodium in snack foods and beverages. This is a common-sense approach that strengthens the investment parents and taxpayers have made in our children and school nutrition programs. Our members across the country stand ready to support full implementation and continued involvement in these important and positive changes.

Sincerely,

A handwritten signature in black ink that reads "Joanne Ikeda".

Joanne Ikeda
President

About the Society for Nutrition Education and Behavior

The Society for Nutrition Education and Behavior is an international organization of more than 1,100 nutrition education professionals who are dedicated to promoting effective nutrition education and communication to support and improve healthful behaviors with a vision of healthy communities through nutrition education and advocacy. Visit the Society for Nutrition Education and Behavior at www.sneb.org. SNEB is a USDA/CNPP National Strategic Partner.

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- ¹ Kids' Safe and Healthful Foods, "Voters Want Healthy Snacks in Schools," April 19, 2012, healthyschoolfoodsnow.org/voters-want-healthy-snacks-in-schools.
- ² J.C. Han, D.A. Lawlor, and S.Y. Kimm, "Childhood Obesity," *Lancet* 375, no. 9727 (2010): 1737-48, ncbi.nlm.nih.gov/pubmed/20451244.
- ³ D.S. Freedman et al., "Cardiovascular Risk Factors and Excess Adiposity Among Overweight Children and Adolescents: The Bogalusa Heart Study," *Journal of Pediatrics* 150, no. 1 (2007): 12-17, ncbi.nlm.nih.gov/pubmed/1718860.
- ⁴ E. Whitlock et al., "Screening and Interventions for Childhood Overweight: A Summary of Evidence for the US Preventive Services Task Force," *Pediatrics* 116, no. 1 (2005): e125-44, pediatrics.aappublications.org/content/116/1/e125.full.pdf+html.
- ⁵ E.R. Sutherland, "Obesity and Asthma," *Immunology and Allergy Clinics of North America* 28, no. 3 (2008): 589-602, [immunology.theclinics.com/article/S0889-8561\(08\)00037-4/abstract](http://immunology.theclinics.com/article/S0889-8561(08)00037-4/abstract).
- ⁶ E.D. Taylor et al., "Orthopedic Complications of Overweight in Children and Adolescents," *Pediatrics* 117, no. 6 (2006): 2167-74, ncbi.nlm.nih.gov/pubmed/16740861.
- ⁷ W.H. Dietz, "Health Consequences of Obesity in Youth: Childhood Predictors of Adult Disease," *Pediatrics* 101, suppl. 2 (1998): 518-25, ncbi.nlm.nih.gov/pubmed/12224658.
- ⁸ Kids' Safe and Healthful Foods, *Out of Balance: A Look at Snack Foods in Secondary Schools Across the States*, October 2012, rwjf.org/content/dam/farm/reports/reports/2012/rwjf402345.
- ⁹ Bridging the Gap, *School Policies and Practices to Improve Health and Prevent Obesity: National Secondary School Survey Results, School Years 2006-07 and 2007-08*, bridgingthegapresearch.org/_asset/984r22/SS_2011_monograph.pdf.
- ¹⁰ Bridging the Gap, *School Policies and Practices for Improving Children's Health: National Elementary School Survey Result: School Years 2006-07 through 2009-10*, bridgingthegapresearch.org.
- ¹¹ O'Toole T, et al., "Nutrition Services and Foods and Beverages Available at School: Results from the School Health Policies and Programs Study 2006." *Journal of School Health* 2007, vol. 77, pp. 500-521.
- ¹² Kids' Safe and Healthful Foods and Health Impact Project, *Health Impact Assessment: National Nutrition Standards for Snack and a la Carte Foods and Beverages Sold in Schools*, June 2012, healthimpactproject.org/resources/body/Snack-Foods-Health-Impact-Assessment.pdf.
- ¹³ Kids' Safe and Healthful Foods and Health Impact Project, *Health Impact Assessment: National Nutrition Standards for Snack and a la Carte Foods and Beverages Sold in Schools*, June 2012, healthimpactproject.org/resources/body/Snack-Foods-Health-Impact-Assessment.pdf.
- ¹⁴ Chriqui J, Resnick E, Schneider L, et al. Bridging the Gap. *School District Wellness Policies: Evaluating Progress and Potential for Improving Children's Health Five Years after the Federal Mandate. School Years 2006-07 through 2010-11*. Volume 3. Chicago, IL: Institute for Health Research and Policy, University of Illinois at Chicago. www.bridgingthegapresearch.org/_asset/13s2jm/WP_2013_report.pdf.