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January 28, 2009

IOM Phase I Report: Comments on Proposed Approach for Recommending Revisions to Nutrition Standards and Meal Requirements for National School Lunch and Breakfast Programs

Good morning, I am Dr. Lorelei DiSogra, Vice President for Nutrition and Health, at United Fresh Produce Association. United Fresh is a national trade organization representing the total fresh produce industry, including growers, fresh-cut processors, wholesaler/ distributors, supermarkets and restaurants. For the past 20 years, I've been engaged in national initiatives to increase fruit and vegetable consumption at the National Cancer Institute, the California Department of Health Services and in the produce industry.

I thank the Committee and the Institute of Medicine's (IOM) staff for an excellent report on proposed plans to revise school meal standards and for the opportunity to comment.

Children's diets are inadequate in fruits, vegetables, and dark green and orange vegetables and the Committee's acknowledgment will hopefully lead to strong recommendations that more fruits and vegetables be added to school meals consistent with the Dietary Guidelines.

I wish to emphasize three points:

Cost - I am very concerned about the statement in the Phase 1 Report (pg 12) that says..."because USDA does not anticipate that additional funding will be available to schools for implementation of the revised requirements, the committee will aim to design changes in requirements in a manner that keeps program costs economical and as close as possible to current levels." This approach is misguided; this constraint will not lead to the best possible recommendations.

First, everyone involved with improving the healthfulness of school meals knows that it will cost more to add more fruits, vegetables and whole grains to school meals. This reality should be boldly acknowledged by the Committee.

Second, we have a new President and a new administration committed to improving child nutrition and focused on prevention. USDA's new Secretary Tom Vilsack has repeatedly stated, in his confirmation hearings and during the last week (USDA News Release attached), that enhancing nutrition and health are top priorities and that..."nutrition programs should be seen as an opportunity to both alleviate hunger and prevent health care problems." In short, we have a new USDA with very different priorities. Perhaps, this Committee needs to ask the new USDA to clarify their position on cost neutrality.

Nutrition and public health advocates are already lobbying Congress for higher school meal reimbursement rates in the 2009 Child Nutrition Reauthorization. The fact that more healthful school meals will require more funding is not a surprise and this

Committee should not be constrained in its recommendations by trying to improve school meals without assuming any additional funding.

Leadership – This is the time for real leadership and I urge the Committee to seize this opportunity, be bold, and provide recommendations that will transform school meals into a model of good nutrition to improve children’s health. Students, parents, school officials, public health advocates and Congress have waited for a very long time, 13 years to date, for school meals to be healthier.

Now is the time! And, now is the time when your leadership can be reinforced by a President and Administration that believes good nutrition is the center of everything. Your recommendations can make a real difference in this environment.

Yes, I understand the current constraints at USDA, state Child Nutrition and school food service programs, but you must rise above these constraints to recommend what should be. I strongly urge the Committee to provide real leadership, make recommendations that are ideal and based on the best nutrition science available.

Acceptability of healthy foods by students - Prior to the Fresh Fruit and Vegetable Snack Program no one believed kids liked or would eat a wide variety of fresh fruits and vegetables. Much can be learned from this successful program and applied to school lunch. Fresh fruits and vegetables must taste great, be high quality, ripe, crisp and flavorful. Salad bars and fresh-cut fruits and vegetables are very popular with students and should be available in all schools. Yes, it may take some time for students to become familiar with some new foods; the Committee should recommend specific strategies that schools can put into place to increase student acceptance of new, healthful foods.

The IOM’s recommendations for revising the National School Lunch and Breakfast Programs will provide a significant opportunity to increase children’s fruit and vegetable consumption and improve their eating habits.

Thank you for your leadership and commitment to this effort and I look forward to the recommendations in your Phase 2 Report.