



Mr. Robert M. Eadie
Chief, Policy and Program Development Branch
Child Nutrition Division, FNS, USDA
3101 Park Center Drive, Room 640
Alexandria, Virginia 22302-1594

Dear Mr. Eadie:

Thank you for the opportunity to provide USDA with recommendations for improving the nutritional quality of school meals through the 2009 Child Nutrition Reauthorization Act.

The following recommendations offered by the United Fresh Produce Association, if adopted, would increase children's access to and consumption of fruits and vegetables in school meals, improve their overall eating habits, reduce risk of obesity and overweight, and promote good health.

Increasing the amount of fresh fruits and vegetables in school meals, serving fruits and vegetables in ways (fresh, fresh-cut and salad bars) that result in kids actually eating more and promoting evidence-based school strategies (salad bars) will improve the nutritional quality of school meals and increase children's consumption of fruits and vegetables, consistent with the 2005 Dietary Guidelines.

By law, the School Lunch Program and School Breakfast Program must be consistent with the latest Dietary Guidelines for Americans. However, school meals currently contain fewer fruits and vegetables than recommended. To meet 2005 Dietary Guidelines:

- School Breakfast should include at least 2 servings of fruit and/or vegetable. **This means adding 1 more serving**
- School Lunch should include at least 3 servings of fruits and/or vegetables per day. **This means adding at 1–2 more servings**

Additionally, America's children currently eat, on average, less than half of the fruits and vegetables recommended by the 2005 Dietary Guidelines. Improving school meals is a critical first step.

United Fresh Produce Association recommends the following priorities for the 2009 Child Nutrition Reauthorization:

1. The USDA Secretary should promote a “Salad Bars in School Cafeteria” Policy.

School Salad Bars are an evidence-based strategy to increase student’s consumption of fruits and vegetables. Salad bars, one of the simplest and most direct ways to increase student’s consumption, provide a wide variety of fresh fruits and vegetables and build on student’s independence and desire to make their own food choices. Understanding that it is not possible for all schools to implement a salad bar, we are not recommending that this policy be a requirement, but rather a policy that encourages USDA to aggressively promote “**Salad Bars in Schools**”. With a national goal in place, the USDA should encourage and promote school salad bars, provide incentives, build on their “Fruits and Vegetables Galore: Helping Kids Eat More” Salad Bar Guide first published in 2004, and provide training to schools to implement salad bars.

2. Provide schools with \$10 million funding per year for non-food assistance grants that will allow them to purchase food preparation equipment (such as refrigeration, salad bars, and etc.) to improve their kitchen facilities to provide meals consistent with the *Dietary Guidelines* and food safety practices, and support their ability to prepare and serve more fresh fruits and vegetables in school meals.

Many schools wish to serve meals more consistent with the Dietary Guidelines, including more fresh fruits and vegetables, but lack basic kitchen equipment, like adequate refrigeration, and lack the financial resources to purchase needed equipment. The non-food assistance grants could be targeted to low-income schools and should be easy for school to apply for. For example, \$10 million per year would enable 1000 schools to purchase walk-in refrigerators and 2500 schools to purchase salad bars.

3. Double the funding for the DOD Fresh Program to \$100 million/year.

The Department of Defense (DoD) Fresh Program is an effective and easy way for schools to purchase a wide variety of fresh fruits and vegetables at the lowest cost delivered directly to the school. The current funding of \$50 million/year allows only a limited number of schools in each state to participate. Doubling the funding for the DoD Fresh Program, or its equivalent, to \$100 million per year would increase the number of schools in each state that could participate in the program and result in more fresh fruits and vegetables being served in school meals.

4. Encourage AMS to significantly expand its commodity purchases of fresh and fresh-cut fruits and vegetables for schools.

Schools are asking for more fresh and fresh-cut fruits and vegetables as part of commodities. However, last year only 3% of all fruit and vegetable commodity purchases made by USDA/AMS were for fresh, resulting in a big gap between what schools are asking for and what AMS is purchasing.

The 2008 Farm Bill almost doubles the annual funding for commodity purchases of fruits and vegetables under Section 32 to the following amounts: FY'08 \$390M; FY'09 \$393M; FY'10 \$399M; FY'11 \$403M; and FY'12 \$406M. Of these available funds, the FNS should be strongly encouraging AMS to expand its purchases of fresh and fresh-cut fruits and vegetables for schools as a strategy to increase student's fruit and vegetable consumption.

The AMS is commended for planning to pilot a fresh-cut sliced apple purchase program for schools. However, as of this date it has yet to be implemented. Once effectively implemented, the AMS should be urged to expand the fresh-cut sliced apple program nationally and expand to other fresh-cut fruits and vegetables that are well liked by students and readily available in the market place. Children like fresh-cut fruits and vegetables and it is an evidence-based strategy to increase their consumption of fruits and vegetables.

5. Increase the current reimbursement rates for all school meals to reflect rising food, labor and transportation costs and to meet current nutrition standards and the Dietary Guidelines.

6. Support Congressional requirement that USDA publish proposed and final rules updating nutrition standards for the school meals programs within 12-15 months and 24 months, respectively, following publication of Institute of Medicine's Report.

Respectfully submitted,



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