



February 12, 2018

Ms. Angela Kline, Director  
Policy and Program Development  
Child Nutrition Programs  
Food and Nutrition Service  
U.S. Department of Agriculture  
P.O. Box 66740  
Saint Louis, MO 63166-6740

Re: Food Crediting in Child Nutrition Programs; Docket Number FNS-2017-0044

Dear Director Kline:

On behalf of United Fresh Produce Association, thank you for the opportunity to provide feedback to the *Food Crediting in Child Nutrition Programs* Request for Information (RFI). United Fresh Produce Association represents the fresh produce supply chain, including growers, shippers, processors, distributors and retailers that serve child nutrition programs.

Please find below responses to the specific questions posed the RFI impacting fresh fruits and vegetables.

**Is it appropriate to continue to credit foods based on the volume or weight served, with the few exceptions discussed above? Why or why not?**

As it relates to fruits and vegetables, the current crediting system is mostly appropriate. It is consistent with the Dietary Guidelines for Americans (DGA) "half plate" serving recommendations, which is important to consistent consumer messaging and confidence around managing dietary intake. Current crediting practices can be managed through the USDA Buying Guide.

One exception, as raised in the original question, is the issue of crediting tomato puree and tomato paste by the reconstituted volume. This practice is not consistent with FNS policy of crediting foods on the customary use of the products and can be a confusing to the child who is otherwise consuming fruits and vegetables in accordance with the DGA and MyPlate. FNS should continue to consider ways to address this inconsistency, including ensuring a wide range of fruits and vegetables through the week.

Crediting for the value served, and not offered, is also important. Americans, including children between the ages of 2-19, do not consume the daily recommended servings of fruits and vegetables. A diverse and colorful array of fruits and vegetables throughout the week helps increase nutrient intake and ensure students are exposed to a variety of options.

## **What are the benefits and negative impacts of having different crediting values for different forms of vegetables and fruits?**

The benefit of the current crediting values, particularly for school breakfast and lunch, is that students are exposed to both a wide variety of fruits and vegetables, and the recommended portion sizes, consistent with the DGA. As reflected in USDA's final rule for nutrition standards, the 2005 and 2010 DGA recommend eating a variety of vegetables, especially dark green and red and orange vegetables and beans and peas. These specific subtypes provide children with a number of nutrients that are currently under-consumed: dietary fiber; folate; magnesium; potassium; and vitamins A, C, and K. Maintaining these subtypes are important to student health and building healthy habits.

Relative to crediting values across forms of fruits and vegetables, the DGA recommends that fruits and vegetables should be consumed in all forms, preferably whole, and cautions consumers to consider the addition of added sugar and sodium in certain canned, dried or frozen products when making food choices.

Intake recommendations are different across forms of fruits and vegetables, with the DGA making recommendations of fruit and vegetable intake based on overall daily caloric recommendations. For example, an individual with a 1,600 calorie diet should consume four servings of fruits and between four and five servings of vegetables per day. A serving is measured as the following: 1 medium fruit; or ¼ cup dried fruit; or ½ cup fresh, frozen, or canned fruit; or ½ cup fruit juice (the DGA recommends limiting fruit juice consumption due to lack of fiber and increased caloric intake). School lunch and breakfast programs should maintain crediting values consistent with the DGA.

## **Should fortification play a role in determining if and how a food is credited in the Child Nutrition Programs? Why or why not?**

No. Fortifying foods in an effort to have them fit within the nutrition standards for school meals misleads students and parents and sets them up for failure in making healthy choices outside of the school setting. For example, if a fortified product is made solely for school food service, but a similar-looking product is produced and available outside the school setting, the student nor the parent will have a way to know that the product is different. Instead, students should be exposed to a wide range of foods within the meal components of the school meals programs – developing healthy habits for students and empowering them to make positive choices for the rest of their lives.

## **Is the presence of certain nutrients more important than other nutrients when determining if and how a food credits in the Child Nutrition Programs? Why or why not?**

It is important that the school meal program reflects current science and addresses the nutrient needs and deficiencies of children. As it relates to fruits and vegetables specifically, the DGA indicates that children do not consume enough dietary fiber, folate, magnesium, potassium, and vitamins A, C, and K. Certain foods, like dark leafy greens and red and orange vegetables have higher rates of these naturally occurring nutrients. There is no reason to serve fortified foods to address these needs when our country has access to fruits and vegetables containing these naturally occurring nutrients.

## **Is it appropriate to continue to consider the customary use of a product when determining how a food credits in the Child Nutrition Programs? Why or why not?**

The customary use is less important than the nutrient profile of the product, assuming it is free of fortification. In the example of the lentil pasta, school meal programs should couple it with nutrition education so that the student is aware and understands the nutrient profile of the product. It is important that the fruit and vegetable crediting over the course of the week remains the same in order for foods like lentil pasta, and other innovative products that meet student dietary needs, to be incorporated in a way that continues to demonstrate a wide variety of foods.

**What role should such educational considerations play in determining the creditability of a food in the Child Nutrition Programs?**

When school meal programs are at their best, they are considered a part of the educational school day and present a significant opportunity to develop students' healthy eating habits, both through direct service of food and nutrition education. The focus of the meal program, through crediting and other means, should remain on ensuring students are exposed to the foods that empower them to make healthful decisions throughout their lives. The MyPlate approach is intended to educate Americans on recommendations around dietary intake, including students. A consistent message to children and students is important to its success.

**Should FNS allow any of these foods [complementary foods] to contribute to the Child Nutrition Programs' meal patterns? Why or why not? If so, which ones?**

Relative to vegetable chips, USDA could continue to allow items included in *Food Buying Guide for Children Nutrition Programs* to be offered as complements to child nutrition programs, should they fit within the overall nutrition standard guidelines, but should not allow them to be credited towards meal components.

There is currently no federal standard of identity for vegetable chips (including potato chips), making it difficult to determine exactly what would constitute a vegetable chip, should it be credible. There are some cases, like in-house baking of kale into "kale chips" that represents a good opportunity to meet vegetable subgroup requirement and should be considered as a preparation technique. However, there are multiple products on the market that could potentially be considered a vegetable chip, either because they are explicitly marketed as such – or because the product is a dehydrated form of a vegetable with a chip-like texture that are not within the spirit of the program. Current nutrition standards for vegetables require that there be no added solid fats, sugars, refined starches, and sodium. Vegetable chips like many of those available in the marketplace today are not consistent with nutrition standards for the vegetable component and at times do not have a vegetable as the first ingredient.

Additionally, allowing vegetable chips to be credited as vegetables moves away from the intent and common-sense approach to provide children with an array of fruits and vegetables that are low in calories, high in dietary fiber, and have minimal sodium and oils.

**Is there an ingredient, processing method, or nutrient standard (e.g., sodium content) that should qualify or disqualify any of these foods?**

No. These foods should not be credible under the child nutrition programs.

**If any of these foods are allowed to contribute to the Child Nutrition Programs' meal patterns, how would this impact the Child Nutrition Programs, including its participants and operators, as well as food manufacturers? What are the potential benefits and negative impacts?**

Items like certain vegetable chips have the potential to negatively impact the quality and image of school meal programs that aim to introduce children to a nutritious produce and establish healthy habits. They are simply not a suitable replacement for the vegetable component.

In closing, thank you once again for the opportunity to provide feedback as the agency reviews crediting for the nation's child nutrition programs. United Fresh Produce shares in your commitment to ensuring America's children have access to the nutritious food they need to succeed inside and outside the classroom. Should there be additional questions or clarification, please don't hesitate to reach out to Mollie Van Lieu at [mvanlieu@unitedfresh.org](mailto:mvanlieu@unitedfresh.org).

Sincerely,

A handwritten signature in blue ink that reads "Mollie Van Lieu". The signature is written in a cursive style and is contained within a white rectangular box.

Mollie Van Lieu  
Senior Director Nutrition Policy  
United Fresh Produce Association