



GEORGIA MILK PRODUCERS, INC.

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Food & Nutrition Service
United States Department of Agriculture
1320 Braddock Place
Alexandria, VA 22314

March 20, 2023

RE: Docket No. FNS-2022-0043

On behalf of the Georgia Milk Producers, Inc. Board of Directors and the dairy farmers of Georgia, these comments are being submitted on the proposed rule titled "Child Nutrition Programs: Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans" published in the Federal Register on February 7, 2023.

The Georgia Milk Producers, Inc. is the trade association for dairy farmers in Georgia representing 89 dairy farms and the families that make up our dairy industry. We write today in support of allowing schools to serve low-fat and fat-free flavored and unflavored milk to students of all ages for breakfast and lunch. Milk is an incredibly nutrient-dense food that provides thirteen essential nutrients to growing children. As demonstrated by previous studies on school channel milk purchases, students consume more milk and thus receive adequate amounts of calcium, potassium, and vitamin D (among other nutrients) when they are allowed a greater variety of choices in fluid milk. We believe that "Alternative B" as outlined in Section 3 (Milk) of the proposed guidelines would lead to more positive health outcomes as students will consume more milk.

USDA Food and Nutrition Service (FNS) must balance the need to limit unnecessary calories in school meals with the need to increase the consumption of nutrient dense foods that are essential to a healthy diet. While "Alternative A" in Section 3 would accomplish the agency's stated goal of marginally limiting added sugars in school meals, we believe that such a change will have very little effect on the taste preferences of young children who have access to a wide variety of inexpensive, sugary beverages outside of school. According to the National Health and Nutrition Examination Survey: 2015-2018, flavored milk contributes only 4 percent of added sugars in the diets of children 18 and younger. School milk processors, which FNS notes in its discussion of added sugars in Section 2 of the proposal, have reduced the amount of added sugar in flavored milk by over 50 percent, enhancing the nutritional benefit of low-fat or no-fat flavored milk when weighed against the calories from sugar.

Furthermore, as noted by Milk Pep in 2018, consumption of milk as part of school breakfast and lunch programs has dropped considerably since limits on milk fat were introduced. By 2018, milk consumption on a per student/per meal basis was down 12 percent. FNS notes in the proposal, "according to [Dietary Guidelines for Americans], average intake of dairy foods, which provide potassium, calcium, and vitamin D, is typically below recommended intake levels for adolescents." Reducing milk options for children will do more to limit their consumption of milk and the valuable nutrients contained in a serving of milk than it will dramatically decrease the amount of added sugars consumed throughout their entire diet.

The links between milk consumption and positive health outcomes are numerous. That is why we support Alternative B in Section 3 (Milk) of the proposed guidelines, and we further encourage USDA to reevaluate existing limits on fat content in school milk options in the future.

Sincerely,

Bryce Trotter
Executive Director
Georgia Milk Producers, Inc.