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Leadership by Egg Farmers for Egg Farmers

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March 21, 2022

Tina Namian, Chief
School Programs Branch
Policy and Program Development Division – 4th Floor
Food and Nutrition Service
1320 Braddock Place
Alexandria, VA 22314

Re: Docket No. FNS-2020-0038, RIN 0548-AE81

Dear Ms. Namian:

These comments are submitted on behalf of United Egg Producers (UEP) and pertain to the final rule entitled “Child Nutrition Programs: Transitional Standards for Milk, Whole Grains, and Sodium.” The Food and Nutrition Service (FNS) asked for comments on both “the provisions of this final rule” and “considerations for future rulemaking related to the school nutrition requirements.” The agency says it intends to publish “a new proposed rule” for school years (SY) 2024-25 and afterward. The current final rule applies to SY 2022-23 and 2023-24 (1).

UEP is a farmer-owned cooperatives whose members independently produce and market approximately 90 percent of all eggs in the United States. UEP strongly supports USDA nutrition assistance programs, including the child nutrition programs to which this rule applies. The American Egg Board (AEB), the research and promotion program funded by U.S. egg farmers, has been increasingly active in working with school nutrition professionals to introduce innovative uses of eggs and egg products in the school setting.

We offer two ideas for your consideration as the agency develops its new proposed rule.

First, **FNS should give consideration to requiring a protein food at breakfast.** While protein foods are required at lunch, they are not currently required at breakfast. The agency sought to make it easier to offer these foods in a proposed rule several years ago, but that rule was ultimately withdrawn.

The National Academies of Sciences, Engineering and Medicine (NASEM, writing at that time as the Institute of Medicine) recommended a number of years ago that protein foods be a required item at breakfast. FNS ultimately decided against the requirement because of cost considerations, but there are good reasons to revisit the topic. Protein is important to the diets of students throughout their



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school years, and eggs – a meat-alternate under FNS rules – provide the highest-quality complete protein. Thus, eggs’ traditional position as a breakfast food offers an easy, affordable way to meet students’ nutritional needs at this important meal. Relatedly, a number of studies have shown that protein-based breakfasts, such as eggs, produce greater satiety and less mid-morning hunger than carbohydrate-based breakfasts.

A requirement for protein foods at breakfast would be a worthwhile addition to FNS’s proposed rule later this year. To the extent that cost concerns remain, the requirement could be phased in or applied on fewer than five days in a school week.

UEP’s second point deals with sodium reduction. Eggs themselves contain little sodium. However, eggs are often offered in dishes such as breakfast sandwiches or breakfast burritos that do have some added salt. Although we support efforts to reduce sodium intake, **we urge FNS to be cautious about mandating sodium reductions that would adversely affect the palatability, functionality or safety of school foods.** We are aware of numerous statements from school nutrition professionals that further sodium reductions will be challenging. FNS should avoid actions that might lead to further declines in average daily participation (ADP) in the school meal programs. School meals are already the healthiest meals that students consume, according to published research. The aim of new regulations should be to increase ADP as a means of encouraging more consumption of nutrient-dense foods.

UEP appreciates the opportunity to provide these comments in response to the proposed rule.

Sincerely

Chad Gregory
President/CEO



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