

Soyfoods Association of North America

1050 17th Street, NW • Suite 600 • Washington, DC 20036 • USA

April 11, 2011

Julie Brewer
Chief, Policy and Program Development Branch
Child Nutrition Division
Food and Nutrition Service, Department of Agriculture
3101 Park Center Drive, Room 640
Alexandria, VA 22302-1594

Re: Docket FNS-2007-0038

Comments on RIN 0584-AD59 Nutrition Standards in the National School Lunch and School Breakfast Programs

Dear Ms. Brewer,

The members of the Soyfoods Association of North America (SANA) believe the School Nutrition Programs (SNP), which include the National School Lunch Program (NSLP) and the School Breakfast Program (SBP), have a crucial role in protecting the health of all school children as well as in boosting their growth and development. SANA supports the program goals of providing nutritionally balanced meals that meet the Dietary Guidelines through serving more fruits, vegetables, and whole grains in a food-based menu plan. USDA's proposal to recognize cultural and age differences of students will certainly make their selection of healthier foods more likely. But, school food service personnel will need technical assistance to identify and serve culturally and age appropriate foods. SANA supports the proposed rules that both simplify the administration and operation of the NSLP and SBP and reinforce the nutrition education messages provided by schools. SANA represents the interests of soybean farmers, soy processors, and manufacturers of soy foods that have provided families and schools high quality protein products that are low in saturated fat, packed with nutrients, and cholesterol free. We are delighted that USDA is considering opening the array of soyfoods available to schools to include products made from whole soybeans, such as tofu.

SANA appreciates the opportunity to comment on the following points in the proposed rule:

1. Use a single food-based meal pattern designed by IOM for menu planning.
2. Separate fruit and vegetable requirements and divide vegetable group into subgroups
3. Serve only fat-free (flavored and unflavored) and low fat (unflavored) milks.
4. Adopt a reasonable method for including soyfoods from whole beans in school meals as meat alternates
5. Drop requirement for Nutrition Disclosure for foods with more than 30% Alternate Protein Product
6. Include more meat alternates

Support for Specific Proposed Rules

1. Use a single food-based meal pattern designed by IOM for menu planning.

The members of the Soyfoods Association of North America agree with USDA's proposal for a food-based meal pattern, recommended by the Institute of Medicine in its 2009 report School Meals: Building Blocks for Healthy Children.¹ The food-based meal pattern method moves away from a focus on foods that could be formulated and fortified to provide specific target nutrients to a focus on nutrient rich foods that are also lower in calories, sodium, saturated fat, and *trans* fat free but also provide the specified nutrients children need.

We understand that the food-based menu planning approach is the most common method used by schools.¹ Many schools that attempt to follow the Nutrient Standard Menu Planning approach have difficulty with collecting the production data and conducting the nutritional analysis.¹ Furthermore, the current rule that permits schools to plan menus that meet nutritional standards through five different approaches, including two food-based, two nutrient-based, and one other method a school chooses² has led to only about a third of schools serving lunches that meet the Dietary Guidelines recommendations for saturated fat, dietary fiber, sodium, and amounts of fruits and vegetables.¹

The IOM's 2009 report recommended a food-based meal pattern based on meeting the 2000 Dietary Reference Intakes for 27 nutrients and the *2005 Dietary Guidelines*, which updates the current USDA nutritional standards for school meals are based on the 1995 Dietary Guidelines and the 1989 Dietary Recommended Allowances. These new IOM patterns are higher in protein, fruits, vegetables, and whole grains which are important to weight control. Translating these nutrient targets into specific foods in specific amounts in a meal pattern for schools to follow simplifies the task for schools and improves the offerings for students. SANA supports the food-based meal that should move schools to offering healthy meals that incorporate more fruits, vegetables, whole grains, lean proteins and plant-based meat alternates that are lower in saturated fat, *trans* fats, cholesterol, and calories.

2. Separate fruit and vegetable requirements and divide vegetable group into subgroups

The Soyfoods Association of North America strongly supports USDA in adopting the IOM's recommendations to dissuade schools from substituting between fruits and vegetables and, instead, requiring both be served daily and in larger quantities. SANA also agrees with the

¹ Institute of Medicine, *School Meals: Building Blocks for Healthy Children*, (Washington, DC: National Academies Press, 2009).

²National Archives and Records Administration, Code of Federal Regulations 7, Department of Agriculture. *Part 210: National School Lunch Program* and *Part 220: School Breakfast Program*, (Washington, DC: Office of the Federal Register, 2005).

proposal that schools offer a minimum number of vegetable servings from each of four vegetable subgroups, including beans and peas in the “others” subgroup.

The evidence based *Dietary Guidelines for Americans, 2010* states that a diet with a relatively high consumption of vegetables, fruits, whole grains, and plant-based proteins are high in dietary fiber and low in calorie density, total fat, saturated fat, and added sugars.³ This combination of foods available to children at school will begin to address the high adiposity in children⁴ and reduce the risk of stroke, type 2 diabetes, some cancers, hypertension and cardiovascular disease.⁵

a. *Separating fruit and vegetable meal components*

The Soyfoods Association of North America supports USDA’s proposal requiring schools to separate the fruit and vegetable groups and offering each as part of school lunch to ensure students can choose from a variety of fruits and vegetables. Currently, the fruit and vegetable groups are not separated, and the Guidelines require only ½ cup of either fruits and/or vegetables for breakfast and ¾ cup at lunch. According to USDA’s SNDA-III results, starchy vegetables and canned fruit were most frequently offered.⁶ Data from the 2007 Youth Risk Factor Surveillance System found less than one-third of adolescents consumed more than two servings of fruit daily while even less (13 percent) consumed more than three servings of vegetables daily. Less than 10 percent consumed both fruit (more than two servings) and vegetables (more than three servings) daily.⁷ Separating the fruit and vegetable groups in the new school meal patterns should give student more of a choice and encourage them to consume more and various fruits and vegetables that protect their health.

b. *Dividing vegetables into subgroups*

In addition, the Soyfoods Association of North America supports the USDA proposal to divide vegetables into four subgroups. Requiring a certain amount to be served from each subgroup should expose students to a variety of nutrient-rich produce that they do not consume today. This requirement is not out of the reach of schools, as schools taking part in the HealthierUS School Challenge that achieve even the lowest level of bronze, must offer a different vegetable every day of the week; including dark green or orange offered three or more days per week and

³ United States Department of Agriculture, Center for Nutrition Policy and Promotion. “Dietary Guidelines for Americans, 2010.” <http://www.cnpp.usda.gov/Publications/DietaryGuidelines/2010/PolicyDoc/PolicyDoc.pdf>.

<http://www.cnpp.usda.gov/Publications/DietaryGuidelines/2010/PolicyDoc/PolicyDoc.pdf>

⁴ USDA’s Evidence Library http://www.nutritionevidencelibrary.com/a_z_index.cfm#W

⁵ Dietary Guidelines for Americans, 2005 <http://www.health.gov/dietaryguidelines/dga2005/document/>

⁶ United States Department of Agriculture, Food and Nutrition Service. “School Nutrition Dietary Assessment- Study III. Volume I: School Foodservice, School Food Environment, and Meals Offered and Served.”

<http://www.fns.usda.gov/ora/menu/published/CNP/FILES/SNDAMIII-Vol1.pdf>.

⁷ State indicator report on fruits and vegetables, 2009

http://www.fruitsandveggiesmatter.gov/health_professionals/statereport.html

cooked dry beans or peas offered weekly. Since the start of the HealthierUS School Challenge in 2004, awards have been given to over 1074 schools in 39 states across the country showing that it is possible to serve a wide variety of vegetables.⁸ Schools serving vegetables from the cooked dry beans or peas subgroup can use soybeans or edamame and other legumes either as a vegetable or as a meat/meat alternate.

3. Serve only fat-free (flavored and unflavored) and low fat (unflavored) milks.

The Soyfoods Association of North America supports USDA’s proposal to substitute low-fat (unflavored) or fat-free (unflavored or flavored) fluid milk for any other fluid milk served in schools, consistent with the IOM recommendations to lower saturated fat content of meals. High consumption of saturated fats increases the risk of having an unhealthy level of blood lipids which in turn may increase the risk of coronary heart disease. Limiting the fluid milk offerings to one percent milk fat or less will help students to avoid consuming excess calories and excess saturated fat.

The Soyfoods Association requests that USDA does not apply this fat limitation to fluid milk substitutes, such as nutritionally equivalent soymilk approved for use in the National School Lunch and Breakfast Programs. Soymilk naturally contains about 3.5 grams of fat which is predominantly unsaturated fat and less than 0.5 gm of saturated fat per 8 ounces. When granting the health claim for soy protein and heart disease, FDA made an exception for soyfoods to carry the health claim although they exceeded the low fat limit because soyfoods are naturally high in fat but low in saturated fat and cholesterol free. USDA should also continue to permit flavored soymilk that meets the USDA nutritional standards for alternatives to dairy milk, especially since the amount of sugar in flavored soymilk is significantly less and the calories are comparable to flavored fat free milk.

Product	Protein gms	Fat gms	Sat Fat gms	Sugar gms	Calories kcal	Calcium mg	Vit D IU
Flavored FF Milk	8-9	0	0	23-28	130-160	300	100
Unflavored LF Milk	8	2.5	1.5	12	110	300	100
Flavored Soymilk, vanilla*	10	4	.5	10	130	300	100
Unflavored Soymilk*	8	4	0	7	80	300	100

*These soymilks have been specifically formulated with added protein to meet the USDA nutrition standards for use in schools meals.

⁸HealthierUS School Challenge <http://www.fns.usda.gov/tn/healthierus/index.html>

Data for these products were retrieved from websites of dairies and soymilk manufacturers that supply these products.

4. For Meats/Meat Alternates Group, adopt a reasonable method for including soyfoods from whole beans in school meals, as meat alternates

In response to USDA’s request for comments to propose a methodology for crediting commercially prepared tofu, the Soyfoods Association of North America offers a specific approach for crediting tofu and other soyfoods made from whole soybean ingredients for use in school meals. The proposed methodology builds on the principles of the USDA rules for crediting soyfoods made from soy protein, an alternate protein product. Currently, the USDA only allows soyfoods that are made with soy protein under the requirements of Appendix A, 7 CFR to Parts 210, 220, 225 and 226 for Alternate Protein Products (APP) to be credited as part of the National School Lunch and Breakfast Programs (ref CFR). The APP is processed so that some portion of the non-protein constituents of the food, in this case the soybean, has been removed. For soybeans, the fibrous components and oil have been removed to some extent. To qualify for APP, the biological quality of the protein must be at least 80 percent that of casein, determined by Protein Digestibility Corrected Amino Acid Score (PDCAAS). Products derived from the soybean contain protein that has a PDCAAS well above 80 percent (ref the WHO report). A third qualification of APP is that the product contains at least 18 percent protein by weight when fully hydrated or formulated. This percentage of protein per weight is the equivalent of about 5 grams of protein per ounce. For soyfoods, such as tofu, the moisture level disqualifies them from this 18% protein by weight requirement. It is important to keep in mind that protein is not a nutrient of concern for children and that soyfoods, according to the chart at the end of this section, are good sources of many nutrients of concern for children.

Over the past 10 years, the ethnic diversity of the United States has increased, and the food offerings that are allowed in reimbursable school meals should be broadened to include tofu and other soyfoods from whole soybean. According to the Census Bureau population estimates for 2000 and 2009, the breakdown of the population is as follows:^{9,10}

Ethnic Group	2000 % of Total Population (281,421,906)	2009 % of Total Population (307,006,550)
Whites*	75	79.6
Black	12.3	12.9

⁹ US Census Bureau, Race Alone or in Combination: 2000. http://factfinder.census.gov/servlet/QTTable?_bm=y&-geo_id=01000US&-qr_name=DEC_2000_SF1_U_QTP5&-ds_name=DEC_2000_SF1_U

¹⁰US Census Bureau, USA Quick Facts. <http://quickfacts.census.gov/qfd/states/00000.html>

Asian	3.6	4.6
American Indian	0.9	1
Native Hawaiian/Pacific Islander	0.1	0.2
Other	5.5	
Two or More Races	2.4	

*About 13% of the total population in 2000 and 16% in 2009 is Hispanic/Latino. This cultural group spreads across each of the races with the greatest majority of Hispanics identifying themselves as White.

The changes in the racial mix of the US population suggest that diversity among participants in the National School Lunch and Breakfast Program should also be intensifying. In particular, the Asian population appears to be growing at the same rate as the Black population, with 3,425,000 Asians and 3,936,000 blacks added to the population from 2000-2009 (reference – www.census.gov/compendia/statab/2011/tables/11s0005.pdf.) Many schools, such as the Montgomery County School System in the Greater Washington, DC area and the Gwinnett County Public Schools, in the metro Atlanta area, have already developed menus with plant-based options for many of the popular menu items.¹¹ Currently, the choices of soy-based options are limited to only those products made from APP.

In addition to meeting the cultural preferences, soyfoods and soy protein ingredients have grown popular in diets of American families who seek nutrient dense, lower saturated fat, cholesterol free options. Likewise, the 2010 Dietary Guidelines strongly recommends shifting the diet to more lean and plant-based protein sources to lower the saturated fat and calorie content of diets. School food authorities nationwide are requesting help in getting tofu and other soyfoods made from the whole soybean ingredients credited for reimbursable school meals. Many of these schools are already using soyfoods made from soy protein that qualify under the APP rule, and seek more variety.

The Soyfoods Association of North America offers the following suggestions in response to the USDA request for suggested methods to credit tofu and other soyfoods not from APP. As noted above, the 18% protein value is required for the protein content of APP when fully hydrated. That proportion translates to about 5 grams of protein per ounce, which would be comparable to a one ounce meat equivalent. With this as a basis, the whole bean soyfoods should also be considered on a serving size comparable to one ounce meat equivalent, when it contains approximately 5 grams per protein per serving size.

¹¹School Nutrition Foundation, Soy Solutions for Schools (webinar).

<http://www.schoolnutrition.org/Content.aspx?id=13739>

Soyfoods Association of North America
 1050 17th Street, NW, Suite 600, Washington, DC 20036
 202-659-3520, Fax 202-659-3522

The *MyPyramid* provides a number of soyfood options in the Protein Foods Group. The following chart builds on the MyPyramid suggested amounts of plant-based options equivalent to animal protein foods such as meat, poultry, fish or egg, but yogurt and cheese have been included below among the Protein Foods instead of the Milk Group. Here are some comparable serving sizes for soyfoods as meat alternates compared to the meat option, including some foods that are already credited and some proposed items.

<u>Product</u>	<u>Serving</u>	<u>Grams of Protein</u>
Edamame*	1/4 cup	6
Soy burger*	1 oz patty	6
Hamburger, 70% lean*	1 oz patty	7
Tempeh	1 oz	6
Soy nut butter*	2 Tbsp	7
Soy nuts, roasted*	1/4 cup (1oz)	11
Egg*	1 large	6
Tofu	3 oz	7
Soy cheese	1 oz	7
Cheese *	1 oz	6
Soy yogurt, vanilla	4 oz	6
Milk yogurt, vanilla*	4 oz	6
Tofurky sausage	1 oz	7
Turkey, sausage	1 oz	8
Soy nutrition bar**	2 bars	8

*Already included in the USDA Buying Guide.

**This soy nutrition bar is made from ground whole soybeans combined with dried fruit (1/8 cup of dried fruit per bar) that could be served for breakfast.

When considering how to credit soyfoods from whole soybean ingredients, USDA should consider that many of the soyfoods as well as low fat versions of dairy foods with standards of identify have emerged since FDA stopped granting additional standards of identity¹². In 1986, SANA adopted a voluntary standard for tofu,¹³ but the Nutrition Facts Panel and the USDA Nutrient Composition Laboratory National Nutrient Database for Standard Reference, Release 22 (2009) provide nutrient analysis of tofu and other soyfoods for which a FDA standard does not exist.

In place of having these standards, USDA could use the CN labeling approach to credit meat/meat alternate equivalents for soyfoods based on 5 grams protein content per serving size and the nutrient analysis provided by the manufacturer. For tofu, the protein content ranges from 3 grams protein per ounce for extra firm to 2 grams of protein for soft tofu. But with a 3

¹² Altman, T. Chapter 5 Nutrient Content Claims. *FDA and USDA Nutrition Labeling Guide, Diagrams, Checklists, and Regulations*. Boca Raton, Florida: CRC Press. 2002.

¹³Soyfoods Association of North America, Tofu Standards. <http://www.soyfoods.org/wp/wp-content/uploads/2010/Tofu%20Voluntary%20Standard.pdf>

ounce serving size, tofu of any type would supply at least 5 grams protein per serving size. Other products such as Tofurky sausage have been developed from tofu and offer a lower saturated fat, lower calorie, high quality meat alternate and generally range from 5 to 9 grams of protein per ounce. Soy cheese would be an ounce equivalent to an ounce of cheese. Soy yogurt would be a 4-ounce serving which is the same serving size as dairy yogurt. A soy nutrition bar combines ground whole soybeans and dried fruit, for a high fiber, high protein quality breakfast option, especially for breakfast in the classroom. For products that combine protein sources, for example the whole soybean and soy protein, the protein per serving would be considered in the same approach as above.

The Soyfoods Association of North America agrees with USDA that technical assistance offered to school food authorities should emphasize strategies for purchasing, planning, and preparing meat alternates. Since there are a number of schools that have experience with using soyfoods, such as the Montgomery County Public Schools and the Gwinnett County Public Schools, these food service directors could provided guidance for successful incorporation of meat alternates in place of popular menu items. Taste testing with students is paramount.¹⁴

¹⁴ Lazor K, Chapman N, and Levine E. Soy Goes to School: Acceptance of Healthful, Vegetarian Options in Maryland Middle School Lunches. *J of School Health*, Volume 80, Issue 4, April 2010, Pages: 200–206.

Nutrient Comparison of Meat and Meat Alternate Foods																				
Food Item	Serving Size	Kcal	Pro (g)	Fat (g)	Sat Fat (g)	Carb (g)	Chol (mg)	Fiber (g)	Iron (mg)	Ca (mg)	B6 (mg)	B12 (mcg)	Folate (mcg)	Mg (mg)	Zn (mg)	K (mg)	Na (mg)	Vit A (IU)	Vit C (mg)	Vit D (IU)
Tofu, extra firm (1)	3 oz (85 g)	85.0	9.0	4.0	0.6	2.4	0.0	1.1	1.4	65.0	0.0	0.0	0.0	0.0	0.0	55.0	25.0	0.0	0.0	0.0
Tofu, firm (2)	3 oz (85 g)	71.0	7.6	3.7	0.4	2.0	0.0	0.7	1.0	106.0	0.0	0.0	0.0	0.0	0.0	55.0	3.0	0.0	0.0	0.0
Tofu, lite, firm (3)	3 oz (85 g)	46.0	7.1	1.4	0.2	1.1	0.0	0.5	1.4	156.0	0.0	2.0	0.0	0.0	0.0	55.0	29.0	1617.0	0.0	133.0
Tofu, silken, extra firm (4)	3 oz (85 g)	47.0	6.3	1.6	0.3	1.7	0.0	0.1	1.0	26.0	0.0	0.0	N/A	23.0	0.5	131.0	54.0	0.0	0.0	N/A
Tofu, silken, firm (5)	3 oz (85 g)	53.0	5.9	2.3	0.3	2.0	0.0	0.1	0.9	27.0	0.0	0.0	N/A	23.0	0.5	165.0	31.0	0.0	0.0	N/A
Eggs (6)	1/2 large (25 g)*	36.0	3.1	2.4	0.8	0.2	93.0	0.0	0.4	14.0	0.0	0.2	12.0	3.0	0.7	34.0	36.0	135.0	0.0	20.0
Soy cheese chunks (7)	1 oz (28 g)	60.0	7.0	3.0	0.0	2.0	0.0	1.0	< 0.36	250.0	N/A	N/A	N/A	65.0	N/A	6.5	190.0	< 100	< 1.2	N/A
Cheese, cheddar, reduced fat (8)	1 oz (28.3 g)*	80.0	7.7	5.2	3.3	0.6	16.0	0.0	0.0	256.0	0.0	0.5	6.0	10.0	1.2	26.0	205.0	179.0	0.0	4.0
Cheese, American, process (9)	1 oz (28.3 g)*	105.0	6.2	8.8	5.5	0.5	26.0	0.0	0.1	155.0	0.0	0.2	2.0	8.0	0.8	47.0	351.0	265.0	0.0	6.0
Soy yogurt, vanilla (10)	4 oz (112.5 g)	105.0	4.5	2.5	0.5	15.5	0.0	1.0	0.5	225.0	0.0	0.0	0.0	0.0	0.0	0.0	10.0	100.0	0.6	0.0
Soy yogurt, unsweetened plain (11)	4 oz (112.5 g)	65.0	5.0	3.0	0.5	3.5	0.0	1.0	0.5	250.0	0.0	0.0	0.0	0.0	0.0	0.0	12.5	100.0	0.6	0.0
Yogurt, vanilla, low-fat (12)	4 oz (113.5 g)*	89.7	5.6	1.4	0.9	15.7	6.0	0.0	0.1	194.0	0.1	0.6	12.0	18.0	0.9	249.0	75.0	49.0	0.9	0.0
Tofurky franks (13)	1.6 oz frank (45g)	80.0	11.0	2.0	0.0	5.0	0.0	3.0	0.7	20.0	N/A	N/A	N/A	N/A	N/A	N/A	390.0	0.0	0.0	N/A
Tofu pups (14)	1 link (42 g)	60.0	8.0	2.5	0.5	2.0	0.0	1.0	1.1	20.0	N/A	N/A	N/A	N/A	N/A	N/A	300.0	100.0	0.0	N/A
Tofu dog (15)	1 wiener (38 g)	45.0	8.0	1.0	0.0	2.0	0.0	0.0	1.8	20.0	N/A	N/A	N/A	8.0	1.5	120.0	300.0	0.0	0.0	N/A
Frankfurters, beef (16)	1.6 oz frank (45 g)*	148.0	5.1	13.3	5.3	1.8	24.0	0.0	0.7	6.0	0.0	0.8	2.0	6.0	1.1	70.0	513.0	0.0	0.0	16.0
Tofurky, deli slices (17)	1 oz (28 g)	54.0	7.0	1.6	0.0	3.2	0.0	1.6	0.6	10.8	0.0	0.1	4.2	10.7	0.4	37.2	162.0	0.0	0.0	N/A
Bologna (18)	1 oz (28 g)*	87.0	2.9	7.9	3.1	1.1	16.0	0.0	0.3	9.0	0.0	0.4	3.0	4.0	2.6	48.0	302.0	20.0	4.3	8.0
Turkey ham (19)	1.7 oz (48.2 g)*	57.0	7.9	1.9	0.6	1.5	31.0	0.0	0.5	3.0	0.0	0.4	N/A	8.0	1.0	122.0	438.0	26.0	0.0	N/A
Tempeh (20)	1 oz (28.3 g)	57.5	5.5	2.0	0.4	4.0	0.0	3.0	0.9	80.0	N/A	N/A	N/A	N/A	N/A	95.0	2.5	0.0	0.0	N/A
Ground beef (21)	1 oz (28.3 g)*	76.7	7.3	5.1	1.9	0.0	25.7	0.0	0.7	6.7	0.1	0.8	2.7	5.7	1.8	86.0	21.3	0.0	0.0	2.3
Tofurky Italian Sausage (22)	1 oz (28.3 g)	76.4	8.2	3.7	0.4	3.4	0.0	2.3	0.8	11.3	0.0	0.0	3.9	14.6	0.5	72.7	175.0	84.6	0.0	N/A
Italian Sausage (23)	1 oz (28.3 g)*	97.0	5.4	7.7	2.7	1.2	16.0	0.0	0.4	6.0	0.1	0.4	1.0	5.0	0.7	86.0	342.0	5.0	0.0	12.0
Soy nutrition bar (24)	2 bars (60 g)	260.0	8.0	10.0	5.0	34.0	40.0	6.0	1.5	45.0	N/A	N/A	N/A	N/A	N/A	460.0	90.0	220.0	14.0	N/A

*Serving size is the equivalent of 1 oz meat/meat alternate per USDA Buying Guide for Child Nutrition Programs Section 1 Meat/Meat Alternates

- 1 Based on USDA National Nutrient Database for Standard Reference Release #23, 2010 for Vitasoy USA, Organic Nasoya Extra Firm Tofu
- 2 Based on USDA National Nutrient Database for Standard Reference Release #23, 2010 for Vitasoy USA, Organic Nasoya Firm Tofu
- 3 Based on USDA National Nutrient Database for Standard Reference Release #23, 2010 for Vitasoy USA, Nasoya Lite Firm Tofu
- 4 Based on USDA National Nutrient Database for Standard Reference Release #23, 2010 for MORI-NU, Tofu, silken, extra firm
- 5 Based on USDA National Nutrient Database for Standard Reference Release #23, 2010 for MORI-NU, Tofu, silken, firm
- 6 Based on USDA National Nutrient Database for Standard Reference Release #23, 2010 for egg, w hole, raw , fresh
- 7 Based on nutrient information, Lisanatti Foods for soy cheddar style chunks http://lisanattifoods.com/index.php?Itemid=9&option=com_zoo&view=item&category_id=6&item_id=5
- 8 Based on USDA National Nutrient Database for Standard Reference Release #23, 2010 for USDA Commodity, cheese, cheddar, reduced fat
- 9 Based on USDA National Nutrient Database for Standard Reference Release #23, 2010 for Cheese, pasteurized process, american, with di sodium phosphate
- 10 Based on nutrient information, Whole Soy & Co. for soy yogurt, vanilla <http://www.wholesoyco.com/our-products/24oz-soy-yogurt/vanilla>
- 11 Based on nutrient information, Whole Soy & Co. for soy yogurt, unsweetened, plain Whole Soy & Co. plain <http://www.wholesoyco.com/our-products/24oz-soy-yogurt/unsweetened-plain>
- 12 Based on USDA National Nutrient Database for Standard Reference Release #23, 2010 for yogurt, vanilla, low fat, 11 grams protein per 8 ounce
- 13 Based on nutrient information, Turtle Island Foods, Inc for Tofurky franks <http://www.tofurky.com/tofurkyproducts/franks.html>
- 14 Based on nutrient information, Lightlife Foods for tofu pups http://www.lightlife.com/product_detail.jsp?p=tofulpups
- 15 Based on nutrient information, The Hain Celestial Group for Yves tofu dog <http://www.yvesveggie.com/products/detail.php/tofu-dog>
- 16 Based on USDA National Nutrient Database for Standard Reference Release #23, 2010 for Frankfurter, beef
- 17 Based on nutrient information, Turtle Island Foods, Inc for Tofurky deli slices http://www.tofurky.com/tofurkyproducts/deli_slices.html
- 18 Based on USDA National Nutrient Database for Standard Reference Release #23, 2010 for Bologna, beef
- 19 USDA Based on USDA National Nutrient Database for Standard Reference Release #23, 2010 for Commodity, turkey ham, dark meat, smoked, frozen
- 20 Based on nutrient information, Lightlife Foods for Soy tempeh http://www.lightlife.com/product_detail.jsp?p=tempeh_soy
- 21 Based on USDA National Nutrient Database for Standard Reference Release #23, 2010 for beef, ground, 80% lean meat / 20% fat, patty, cooked, broiled
- 22 Based on nutrient information, Turtle Island Foods, Inc for Tofurky Italian sausage <http://www.tofurky.com/tofurkyproducts/sausages.html>
- 23 Based on USDA National Nutrient Database for Standard Reference Release #23, 2010 for sausage, Italian, pork, cooked
- 24 Based on nutrient information, Pharmavite LLC for SOYJOY bars <http://us.soyjoy.com/flavors.aspx>

5. Nutrition disclosure for foods with more than 30% APP as part of meal requirements for lunches and breakfasts under §210.10 (n)

The Soyfoods Association of North America understands the need to distinguish dishes that have more than 30% APP in a manner separate from a dish solely from beef, pork, poultry or seafood. USDA should provide school food authorities some technical assistance in naming menu items that could be 31 to 100% soy protein in a manner to ensure high student acceptance of these healthier options which would have less saturated fat, calories, and no cholesterol compared to the 100% meat items. The Association would be pleased to provide ideas from the numerous recipes and cookbooks that have utilized soy-based products.

6. Meal pattern requirements for School Breakfast should include meat alternate at breakfast

The Soyfoods Association of North America agrees with the IOM's recommendation requiring a meat or meat alternate at breakfast to provide more variety to students. For example, the soy-based sausages offer a nutrient-dense, low saturated fat, and cholesterol free option for breakfasts. Technical assistance and sample menus will help schools understand how they can incorporate meat alternates like soyfoods made from APP, and, perhaps, soyfoods made from whole soybean ingredients if permitted in the future, into breakfasts. We understand that currently schools could offer two grains and no meats at breakfast, but the USDA proposal would require at least one serving of meat/meat alternate a day. To provide schools more flexibility and to recognize that most meat portions would be greater than one ounce, USDA may consider meeting the 5 ounce equivalents of meat over a five day period, allowing schools to serve two ounce equivalents on one day and none on another.

7. Include meat alternates, such as popular soyfoods, as part of USDA Foods available to schools.

To address USDA's request for ways to lower the costs of implementing school meals, the Soyfoods Association of North America suggests USDA purchase meat alternates, such as soy butter and veggie burgers, that are lower in saturated fat, trans fat, and calories than meats currently purchased, along with more fruits, vegetables, whole grains, and lower sodium products to make a wider variety of USDA foods available to schools. Technical assistance may also be needed to ensure the processing agreements at the state level also follow specifications that are used at the federal level for purchasing healthier foods.

With the growing popularity of soyfoods, it is likely that offering more soyfoods as meat alternates in school lunch and breakfast menus will attract new student customers into the school meals programs and bring additional revenues. The SLBCS-II study found that school food authorities that produce more meals are better able to lower per-meal costs. In schools that arrange for a careful introduction of new meat alternates, student acceptance and consumption of alternates was very close to the traditional meat option (ref Illinois study and Montgomery county school study).

Conclusion

The Soyfoods Association of North America wholeheartedly supports USDA's efforts to improve the healthfulness of school meals as a down payment on preventing chronic disease in the future. More importantly, reducing obesity during childhood has a direct impact on student performance and teasing in school^{15,16}. Obese children are developing diabetes, high cholesterol, and high blood pressure. USDA has shown amazing leadership in issuing very strong regulations for school breakfasts and lunches that establish healthy food-based meal pattern requirements, offer technical assistance and training, and encourage nutrition education for students. Promoting the healthy school meal options in a positive manner that will motivate students is essential to ensure what is offered is also selected by students. The Association offers USDA assistance related to assisting schools in the use of meat alternates that are low in saturated fat, high in protein quality, and cholesterol free.

Sincerely,

A handwritten signature in cursive script that reads "Nancy Chapman".

Nancy Chapman, RD, MPH
Executive Director

¹⁵ Neumark-Sztainer D, Falkner N, Story M, Perry C, Hannan PJ, Mulert S. Weight-teasing among adolescents: correlations with weight status and disordered eating behaviors. *Int J ObesRelat Metab Disord*. 2002;26:123-131.

¹⁶ Hayden-Wade H, Stein R, Ghaderi A, Saelens B, Zabinski M, Wilfley D. Prevalence, characteristics, and correlates of teasing experiences among overweight children vs. non-overweight peers. *Obese Res*. 2005;13:1381-1392.