

February 11, 2025

The Honorable John Boozman
Chair
Senate Committee on Agriculture, Nutrition, & Forestry
United States Senate

The Honorable Amy Klobuchar
Ranking Member
Senate Committee on Agriculture, Nutrition, & Forestry
United States Senate

The Honorable Tim Walberg
Chair
House Committee on Education and Workforce
United States House of Representatives

The Honorable Robert “Bobby” Scott
Ranking Member
House Committee on Education and Workforce
United States House of Representatives

Dear Chairs and Ranking Members,

The undersigned members of the National Alliance for Nutrition and Activity, the nation’s largest nutrition advocacy coalition, **strongly urge you to oppose S.222/H.R. 649, the Whole Milk for Healthy Kids Act of 2025.** S.222/H.R. 649 would allow school meals to offer full-fat (whole) and reduced-fat flavored and unflavored milk, and arbitrarily exempt full-fat and reduced-fat milk from current saturated fat limits in school meals, both of which are inconsistent with the recommendations of the 2020-2025 Dietary Guidelines for Americans (DGAs).

School meal standards, by law, must be aligned with the Dietary Guidelines for Americans, which are reviewed and revised every five years. The DGAs recommend full-fat (whole) milk only for children under the age of two, and fat-free and low-fat milk after that. In addition, the DGAs recommend saturated fat should account for less than 10 percent of calories per day.¹ As such, both the National School Lunch Program (NSLP) and School Breakfast Program (SBP) meal patterns allow only fat-free and low-fat milk and require that less than 10 percent of

¹ U.S. Department of Agriculture and U.S. Department of Health & Human Services. Dietary Guidelines for Americans 2020-2025. Executive Summary, Pages ix-x. https://www.dietaryguidelines.gov/sites/default/files/2020-12/Dietary_Guidelines_for_Americans_2020-2025.pdf.

calories in the meal come from saturated fat over the week.^{2,3} In 2024 the U.S. Department of Agriculture (USDA) proposed updates to the school nutrition standards to more closely align with the 2020-2025 DGAs, which did not change the saturated fat limit nor increase the milkfat allowed to be served in school meals. Singling out milk—in this case, whole and reduced-fat milk—to be exempt from the recommendations of the Dietary Guidelines is a slippery slope for allowing special interests to carve out exemptions in school meal program rules. Allowing the change in the service of whole and reduced-fat milk will negate the progress that has been made in the planning and service of healthier foods to children in schools.

Milk contains nutrients of concern, such as vitamin D and calcium. However, unlike fat-free and low-fat milk, full-fat milk contains too much saturated fat to be part of a healthy food pattern. According to USDA data, one cup of whole milk contains around 4.5 grams of saturated fat.⁴ Full fat milk is so high in saturated fat that the government prohibits its labels from claiming that calcium can reduce the risk of osteoporosis; fat-free and low-fat milk, however, can make these claims.⁵ By allowing full-fat milk in lunch and adjusting saturated fat allowances accordingly, S.222/H.R. 649 would allow an additional 4.5 grams of saturated fat daily in school meals beyond the science-based limit that is currently in place.

School meal nutrition standards were strengthened significantly in 2012. These updates were an overwhelming success, particularly for children who are part of households with fewer financial resources.⁶ A 2021 study found that school meals are the single most healthy source of nutrition for children—more nutritious than grocery stores, restaurants, worksites, and others.⁷ Yet even with the current nutrition standards that limit saturated fat in school meals, most children, on average, still consume more saturated fat than is recommended. According to the DGA, more than 80 percent of children ages 5-8 years, more than 85 percent of youth ages 9-13, and over 75 percent of youth ages 14-18 consume too much saturated fat.⁸ Allowing full-fat milk in schools would only worsen this problem.

² U.S. Department of Agriculture. National School Lunch Program Meal Pattern. Updated December 04, 2024. <https://www.fns.usda.gov/nslp/national-school-lunch-program-meal-pattern-chart>. Accessed on February 11, 2025.

³ U.S. Department of Agriculture. School Breakfast Program Meal Pattern. Updated December 04, 2024. <https://www.fns.usda.gov/school-meals/nutrition-standards/sbp-meal-pattern>. Accessed on February 11, 2025.

⁴ U.S. Department of Agriculture. FoodData Central Search Results: Milk, whole. Portion: 1 cup. [Fatty acids, total saturated: 4.54 g]. <https://fdc.nal.usda.gov/fdc-app.html#/food-details/1097512/nutrients>. Accessed February 11, 2025.

⁵ 21 CFR 101.14(a)(4)

⁶ Kenney EL, et al. Impact Of The Healthy, Hunger-Free Kids Act On Obesity Trends. *Health Aff.* 2020;39:1122–1129.

⁷ Liu J, Micha R, Li Y, Mozaffarian D. Trends in Food Sources and Diet Quality Among US Children and Adults, 2003-2018. *JAMA Netw Open.* 2021;4(4):e215262.

⁸ U.S. Department of Agriculture and U.S. Department of Health & Human Services. Dietary Guidelines for Americans 2020-2025. Executive Summary, Pages 79, 82, and 85. https://www.dietaryguidelines.gov/sites/default/files/2020-12/Dietary_Guidelines_for_Americans_2020-2025.pdf.

The fat content of school milk is neither the cause nor the solution to the decades-long decline in fluid milk consumption in the United States and the struggles of the dairy industry. According to a 2013 Economic Research Service (ERS) report, younger generations consume less milk than preceding generations, but this trend is not exclusive to schoolchildren.⁹ According to the ERS economists, “individuals born in the 1970s, for example, drank less milk in their teens, 20s, and 30s than individuals born in the 1960s did at the same age points. Those born in the 1980s and 1990s, in turn, appear likely to consume even less fluid milk in their adulthood than those born in the 1970s.” Rather than acknowledging the fact that 36 percent of Americans experience lactose malabsorption, (with African Americans, American Indians, Asian Americans, and Hispanics/Latinos experiencing at higher rates than non-Hispanic White Americans),¹⁰ S.222/H.R. 649 perpetuates the cumbersome requirement that students must obtain a doctor’s note documenting a disability to receive a substitute for fluid milk, while arbitrarily increasing access to the less-healthy full-fat milk.

We thank you for your attention to this matter. Passing S.222/H.R. 649 would be a departure from the long-standing tradition of establishing food and nutrition standards for federal child nutrition programs based upon the findings of independent reviewers and the scientific community. There are evidence-based strategies to increase school meal consumption – and by extension, potentially school milk consumption – that do not involve weakening nutrition standards. Changes to school nutrition standards should be guided by the Dietary Guidelines, not special interests, and as such, we strongly urge you to put children’s interests first and uphold the science-based process and oppose the Whole Milk for Healthy Kids Act of 2025. Our children deserve no less.

Sincerely,

Academy of Nutrition and Dietetics
Advocates for Better Children's Diets
American Academy of Pediatrics
American Heart Association
American Public Health Association
Ann & Robert H. Lurie Children's Hospital of Chicago
Balanced

⁹ Stewart, Hayden and Kuchler, Fred. Fluid Milk Consumption Continues Downward Trend, Proving Difficult to Reverse. Economic Research Service. U.S. Department of Agriculture. June 21, 2022. <https://www.ers.usda.gov/amber-waves/2022/june/fluid-milk-consumption-continues-downward-trend-proving-difficult-to-reverse/>. Accessed on February 11, 2025.

¹⁰ National Institute of Diabetes and Digestive and Kidney Diseases. Definition & Facts for Lactose Intolerance. February 2018. <https://www.niddk.nih.gov/health-information/digestive-diseases/lactose-intolerance/definition-facts#common>. Accessed on February 11, 2025.

Center for Biological Diversity
Center for Science in the Public Interest
Chef Ann Foundation
Community Food Advocates
Friends of the Earth
Healthy Food America
Healthy Schools Campaign
Kids In Nutrition
Life Time Foundation
LunchAssist
National Association of Pediatric Nurse Practitioners
National WIC Association
Partnership for a Healthier America
Physicians Committee for Responsible Medicine
Public Health Institute
Society of Behavioral Medicine
Sweet Pea Plant-Based Kitchen
UConn Rudd Center for Food Policy and Health
Wellness in the Schools