



Serving the Vending, Coffee Service and Foodservice Management Industries

[Docket No. FNS-2011-0019]  
RIN 0584-AE09  
7 CFR Parts 210 and 220

National School Lunch Program and School Breakfast Program: Nutrition Standards for All Foods Sold in School as Required by the Healthy Hunger-Free Kids Act of 2010

Food and Nutrition Service  
USDA

Federal Register: February 8, 2013 (Volume 78, Number 27)  
[Proposed Rules]  
[Page 9529-9567]

Vol. 78 No. 27 Part III  
Friday, February 8, 2013

**Comments of:**  
**The National Automatic Merchandising Association**

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April 9, 2013

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**Re: [Docket No. FNS-2011-0019] RIN 0584-AE09**

The National Automatic Merchandising Association (NAMA) offers the following comments on the proposed rule:

**A. NAMA: Introductory Background**

The National Automatic Merchandising Association (NAMA) is the leading voice of the \$42 billion vending and refreshment services industry. Founded in 1936, NAMA is comprised of approximately 2,200 industry suppliers, operators, equipment manufacturers and service providers. The vending and refreshment services industry provides jobs for more than 700,000 hardworking Americans. NAMA members include many small family owned businesses, with three or fewer employees. NAMA has 34 affiliated State Councils encompassing 41 states. The basic mission of NAMA is to collectively advance and promote the vending and refreshment services industry, so as to best serve these industries customers and NAMA members.

**B. NAMA's Healthy Choices Programs**

**NAMA's "Balanced for Life®" and "Fit Pick®" Programs:**

NAMA members have a long-standing commitment to providing Americans with nutritional information needed to make an informed decision when purchasing food and beverage from vending machines. Across the country, school and work vending accounts are looking to our industry and Associations to partner with them on health and wellness issues. To address this need, NAMA developed the Balanced For Life® ([www.balancedforlife.net](http://www.balancedforlife.net)) and Fit Pick® ([www.fitpick.org](http://www.fitpick.org)) programs to assist in the issue of providing "healthier for you" choices in vending. These are path-breaking healthy food programs for the vending industry which are popular and successful. Our voluntary program components assist vending operators with tools to help and truly be part of the solution. Because our nutritional programs are a stand-alone resource, each vending operator can easily implement the program he or she thinks is best suited to a particular location. More than 175 government agencies, 105 schools, universities and/or school systems, and all branches of the U.S. Military, are currently registered participants in our Fit Pick® vending program.

The program consists of two standard packages, including one that complies with the standards of the Alliance for a Healthier Generation (“AHG”).<sup>1</sup>

NAMA has always been committed to the health of our children, and has supported health and safety regulations designed to protect and promote healthy growth for our children. For example, we have supported the federal government’s “competitive foods” regulation requiring that foods of minimal nutritional value not be sold in the cafeteria when the lunch is being served. We have urged our members to comply with this regulation since its inception.<sup>2</sup>

A recent study conducted by NAMA offers more compelling evidence that vending machines are not the culprit behind this growing obesity problem. The study reviewed purchases from vending machines at schools. It evaluated 2,084 school vending machines, serving over one million school children, and concluded that students actually purchased far less than one candy bar or salted snack item per student per week. That’s right – less than one candy bar or snack *per student per week*.<sup>3</sup>

As for sodas, the results were similar – the average per-student, weekly consumption of carbonated drinks in high schools was just 16.42 ounces. Obviously, one snack or soft drink per week, by itself, is not going to make anyone obese. Clear evidence that taking vending machines out of our schools or imposing overly restrictive limitations on what can be sold will have little, if any, impact on what is a very complicated problem, obesity.

### **C. Specific Comments regarding USDA’s Proposed Rule:**

#### **1. General**

NAMA understands and appreciates the goals of the USDA’s (“The Department’s”) proposed rules on competitive foods sold in schools. However, NAMA believes that some of these proposed rules do little to help with childhood obesity and may place an undue burden on the vending industry, specifically those operating small businesses. Some small vending operators rely solely on school sales for their income while others rely on it for the majority of their income. While the USDA cites industry data regarding the small percentage of total vending machine dollar sales in schools, this small amount may represent a major income stream for a vending business specializing its sales to schools.<sup>4</sup>

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<sup>1</sup> Alliance for a Healthier Generation Food Guidelines, <http://www.healthiergeneration.org/companies.aspx?id=2540>.

<sup>2</sup> Competitive Food Regulations, 7 CFR Parts 210 and 220; 77 Fed. Reg. 17 (Jan. 26, 2012).

<sup>3</sup> Key Balanced for Life Talking Points, <http://www.perfectchoicevending.com/pdfs/healthier-snacking/Talkingpoints.pdf>

<sup>4</sup> The vending industry estimates that primary and secondary schools accounted for 2.2 percent (\$1 billion out of \$45.6 billion) of total vending machine sales in 2008. Census of the Industry 2009, Vending Times, [http://www.vendingtimes.com/Media/Sites-AdministratorsSiteNavigation/VendingTimes\\_Census2009.pdf](http://www.vendingtimes.com/Media/Sites-AdministratorsSiteNavigation/VendingTimes_Census2009.pdf).

Later in these comments, NAMA proposes that the Department adopt our Fit Pick® program as the rule, as it relates to sales of competitive food. However, if our proposal is not accepted, we strongly believe that any final rules should be phased-in over at least a three-year period. This phase-in would provide for an initial percentage of the competitive foods meeting the adopted nutrition standards, with an annual increase until adopted standards are met in a minimum of three years. This would allow students to become familiar with the new products and have less immediate impact on the income to vending operators and the school programs surrounding student clubs.

## **2. Definitions**

NAMA urges the USDA to clarify the proposed rule's definition of School Campus. The proposed rule defines School Campus as: "all the areas of the property under the jurisdiction of the school that are accessible to students during the school day".<sup>5</sup> NAMA believes that this definition could be interpreted to include teacher's lounge areas and school property limited to faculty and staff, but technically accessible to students during the school day. USDA should clarify this definition by amending it to read: "School Campus: all areas of the property under the jurisdiction of the school that are accessible to students during the school day, specifically excluding teacher's lounges and similar areas restricted to faculty and staff.

## **3. School-Sponsored Fundraisers**

The Department's exemptions allowing for school-sponsored fundraisers are supported by NAMA. The proposed rules state that school-sponsored fundraisers are recognized as reasonable enhancements to the school community as well as method of financing some important school-sanctioned activities for students. The sale of food items that meet the proposed nutrition requirements (as well as the sale of nonfood items) at fundraisers would not be limited in any way under the proposed rule. In addition, the proposed standards would not apply to food sold during non-school hours, weekends and off-campus fundraising events such as concessions during after-school sporting events. Further, the proposed standards would not apply to food or beverages sold on school grounds, during school hours at "a limited number" of school fundraisers.<sup>6</sup> NAMA suggests that allowances be made for distribution of items intended for school sponsored fundraisers during school hours to insure that items are available to students prior to the time that they depart campus at the end of the school day.

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<sup>5</sup> 78 Fed. Reg. at 9534.

<sup>6</sup> 78 Fed. Reg. at 9540.

#### **D. Regulatory Flexibility Act**

NAMA appreciates the USDA's review with regard to the Regulatory Flexibility Act of 1980 (RFA) (5 U.S.C. 601-612) and their inclusion of the Initial Regulatory Flexibility Act (IRFA) analysis. NAMA reminds the USDA that Vending and Food Service Management Companies are included as industry groups that may be more directly affected by the proposed rule than others.<sup>7</sup> Many NAMA members and small businesses within the vending and food service management community will be challenged by the changes contained in the proposed rules. They will be challenged by issues related to loss of revenue, modification of product lines, loss of capital invested in equipment and vehicles, and human resources.

We agree that this rule will have a significant economic impact on a substantial number of small entities and urge USDA to perform a Final Regulatory Flexibility Analysis during the final rulemaking analysis.<sup>8</sup> “. . . [T]he RFA requires agencies to either publish a certification statement with a factual basis as in the proposed rule, or a (FRFA). Agencies must prepare a FRFA unless the agency finds that the final rule will not have a significant economic impact on a substantial number of small entities or the final rule is issued under the APA provision allowing for good cause to forego notice and comment rulemaking.”<sup>9</sup> NAMA welcomes the opportunity to participate and provide input in the FRFA process.

#### **E. Specific Comments regarding Food Requirements:**

NAMA is supportive of the sale of eligible food without any time and place restrictions. USDA should adopt food requirements that reflect the “vary by grade” level standard that was suggested for beverages. For example, proposed rules for beverages allow different size and caloric content by school grade level.

The USDA should implement the NAMA Fit Pick® program, as it relates to food requirements, at all grade levels.<sup>10</sup> The program consists of two standard packages, including one that complies with the standards of the AHG. These standards are already widely used in schools and provide more flexibility while assuring that the items that are sold on school campuses meet established nutritional guidelines. Fit Pick® would provide the USDA with an option that provides flexibility for the industry and lessens the impact on small business on both the revenue and expense sides. This would provide a program that the industry and schools are familiar with, therefore creating a simpler and more cost-effective implementation process.

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<sup>7</sup> 78 Fed. Reg. at 9548.

<sup>8</sup> 78 Fed. Reg. at 9542.

<sup>9</sup> United States Small Business Administration, “The RFA in a Nutshell: A Condensed Guide to the Regulatory Flexibility Act,” October 2010, [http://www.sba.gov/sites/default/files/RFA\\_in\\_a\\_Nutshell2010.pdf](http://www.sba.gov/sites/default/files/RFA_in_a_Nutshell2010.pdf).

<sup>10</sup> [www.fitpick.org](http://www.fitpick.org)

The NAMA Fit Pick® program is consistent with the nutrient standard set forth in the proposed rules by requiring that snacks meet the 35-10-35 standard: less than 35% calories from fat; less than 10% calories from saturated fat; less than 35% total weight in sugar (nuts and seeds excluded).<sup>11</sup> The AHG guidelines also include a sodium cap of 230 milligrams of sodium and a calorie cap of 180 or 200 calories depending on the location.

Further, the Food Requirements section should be modified to eliminate the requirement that any items sold in schools must be either a fruit, a vegetable, a dairy product, a protein food, a whole grain rich grain product or combination food that contains at least ¼ cup of fruit or vegetable or contain 10% of the Daily value of a nutrient cited as a public health concern in the 2010 Dietary Guidelines for Americans (calcium, potassium, vitamin D or fiber).<sup>12</sup> This requirement will severely limit the products that will be allowed for sale and reaches beyond the dietary guidelines of programs such as the AHG.<sup>13</sup> This provision precludes many items that might otherwise meet the nutrient standards because they do not fall into one of the food groups as defined.

Again, it is recommended that the USDA adopt a “vary by grade” program that states that a percentage of competitive foods offered for sale meet Fit Pick® nutritional requirements. It is recommended that Food Requirements be changed to reflect Fit Pick® standards for 100% of competitive foods at the elementary school level, 50% at the middle school level and 35% at the high school level.

NAMA contends that a greater variety of snacks in high schools is appropriate given the increased independence of high school students. The greater selection of snacks may discourage students, specifically at the high school level, from leaving campus to seek alternative snacks. In addition, portion sizes can be controlled on items available through vending machines. If students leave campus they are able to purchase beverages and snacks in larger quantities.

If students are purchasing snacks off campus as opposed to through vending machines and student stores it will adversely impact the revenue stream that many schools and clubs rely on to fund important programs including scholarships and athletic programs. These athletic programs provide much needed physical activity. It is well established that physical activity is a key factor along with calorie intake in maintaining healthy weight and proper fitness. In addition there are a number of on-campus school clubs that rely on sales from student stores to fund their activities and educate students on the mechanics of operating a business and making a

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<sup>11</sup> 78 Fed. Reg. at 9531.

<sup>12</sup> 78 Fed. Reg. at 9535.

<sup>13</sup> “Alliance for a Healthier Generation School Program. How it works”, [https://schools.healthiergeneration.org/how\\_it\\_works/](https://schools.healthiergeneration.org/how_it_works/).

profit.<sup>14</sup> Limiting the items that can be sold through vending and student stores will result in loss of revenue provided to and loss of educational opportunities provided through student clubs.

The proposed rules reference school districts that have implemented nutrition standards with little or no impact to their revenue.<sup>15</sup> There is likewise recognition that in some school districts it has impacted the revenue from vending and stores. Reference is made to California and the impact that mandated nutritional standards have had on sales in that state.<sup>16</sup> It should be noted that the rules in California are less restrictive than these proposed rules and do not include the requirement that foods must fall within specified food groups.<sup>17</sup> The California standards are more aligned with the NAMA Fit Pick® program that we urge the Department to adopt. Furthermore, California has a “vary by grade” structure that we request be adopted by USDA.

Restricting the sale of items on campus does not prevent students from consuming those items, even while on school premises. There are numerous examples of students bringing products on campus and selling them to classmates. More stringent competitive food restrictions could perpetuate this activity, leading to increased food safety issues and safety concerns due to the cash transactions. Several articles have appeared highlighting these situations and raising concerns about the unintended consequence of the restrictive standards.<sup>18</sup>

The USDA should revisit and amend the sodium standard set forth in the proposed rule. We believe the sodium limitation is too restrictive and is not reflective of the 230 milligrams standard set forth in the AHG standards.<sup>19</sup> Further caps on sodium may eliminate some items that some consider healthy snacks such as beef jerky and similar products.

NAMA also contends that there should not be any distinction between the competitive food items and those items allowed under the National School Lunch Program (NSLP).<sup>20</sup> If an item can be served as part of the reimbursable program it should also be allowed in the Competitive Food program. Furthermore, there are different rules for a la carte items that don't apply to other competitive foods sold

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<sup>14</sup> <http://www.deca.org/about/>

<sup>15</sup> 78 Fed. Reg. at 9531.

<sup>16</sup> 78 Fed. Reg. at 9557.

<sup>17</sup> 78 Fed. Reg. at 9555.

<sup>18</sup> Zarkin, Nicholas, “Candy dealers: Samo’s underground entrepreneurs”, <http://www.thesamohi.com/feature/candy-dealers-samo%E2%80%99s-underground-entrepreneurs>.

<sup>19</sup> 78 Fed. Reg. at 9531.

<sup>20</sup> 79 P.L. 396, 60 Stat. 230

through vending and student stores. There should not be any distinction based on where the item is sold on school property accessible to students. If it is acceptable in the a la carte program it should be acceptable in vending and student stores.

NAMA supports the second alternative on total sugars. Total weight equal to or less than 35 percent in sugar is consistent with Fit Pick® and the AHG standards that have already been adopted by many schools. This is also a standard that many vending operators are familiar with and that many manufacturers use to promote their healthier choices.

#### **F. Specific Comments regarding Beverages:**

Many NAMA members have worked closely with the AHG to develop and implement voluntary national school beverage guidelines and have voluntarily, prominently displayed calorie counts on the front of beverage cans, containers, and packages.

NAMA supports the Department's approach to provide a broader range of lower-calorie beverages to high school students and the availability of caffeinated beverages in high schools. Furthermore, if the USDA determines to implement a beverage standard, which is consistent with either Alternative D1 or Alternative D2, NAMA would be supportive of Alternative D2. The below comments, as it relates to Alternatives D1 and D2, are based on the assumption that the Department will implement one of those standards and not a less stringent standard. Some NAMA members, concerned about the negative effect that these rules will have on their business, would support a less stringent beverage standard.

NAMA recommends that USDA modify the proposed beverage standards in order to: (1) maintain consistency with Food and Drug Administration ("FDA") regulations); (2) maintain uniformity and consistency within and among the proposed food and beverage standards; (3) remove potential sources of confusion; (4) allow the sale of a very limited number of additional beverages in schools; and (5) facilitate implementation and compliance and enforcement. It is particularly important from an implementation perspective that calorie thresholds/standards be defined in terms that are consistent with FDA rounding rules, visible on product labels, and based on defined amounts (*i.e.*, 12 fluid ounces) as opposed to "per serving."

Specifically, NAMA recommends that USDA modify the proposed beverage standards as follows:

- Consistent with USDA's proposed food standards, eliminate the requirement that certain beverage options in high schools "not be available or served to students in the food service area during the meal service period."
- Remove the word "serving[s]" from Alternative D2 and the standard for calorie-free/diet beverages in order to maintain consistency with other provisions of the

proposed beverage standards (which only refer to fluid ounces), and to avoid potential and unintended confusion with FDA's definition of the term.

- If adopting Alternative D2, slightly modify the proposed standard to read as follows: "No more than 12 fluid ounces of other beverages that are labeled to contain no more than 50 calories per 8 fluid ounces or 80 calories per 12 fluid ounces." This change would maintain consistency with FDA rounding rules and tie the calorie threshold to labeled calories.
- Modify the standard for calorie-free/diet beverages to read as follows: "No more than 20 fluid ounces of other beverages that are labeled to contain less than 5 calories per 8 fluid ounces, or less than or equal to 10 calories per 20 fluid ounces." As in the recommendation above, the change would maintain consistency with FDA rounding rules and tie the calorie threshold to labeled calories.
- Simplify the standards by combining the beverage category defined as "calorie-free, flavored and /or carbonated water" with the calorie free/diet beverages category since the requirements for each (*i.e.*, calorie caps and portion sizes) are identical.
- Expand the water category for all ages to allow for carbonation and/or natural flavors but not sweeteners (whether caloric or non-caloric).
- Permit the sale of diluted juices (products comprised exclusively of 100 percent juice and water without added sweeteners) for all ages with the same portion size caps as 100 percent juice.

NAMA believes that these proposed modifications meet the requirements of the Healthy, Hunger-Free Kids Act of 2010 ("HHFKA") which requires competitive food standards to be consistent with the Dietary Guidelines for Americans, and requires USDA to consider, among other things, "existing school nutrition standards, including voluntary standards for beverages . . . ," and the "practical application of the nutrition standards."<sup>21</sup> These proposed modifications would also be consistent with USDA's overall health goals for its competitive food standards given that they promote the availability and consumption of calorie-free, lower calorie, and/or nutrient dense beverages that provide needed hydration.

In addition to plain water, milk, and 100 percent juice, the proposed rule would also permit certain additional beverage options in high schools. These include 20 ounces or less of calorie-free, flavored and/or carbonated water, and other calorie-free/diet beverages that comply with FDA's "calorie free" standard.<sup>22</sup> The proposal would also

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<sup>21</sup> 78 Fed. Reg. at 9530.

<sup>22</sup> 78 Fed. Reg. at 9564.

allow in high schools 12 ounces of other beverages within a specified calorie limit. The proposal offers two alternatives for this limit. The first (Alternative D1) is “no more than 40 calories per 8 fluid ounce serving or 60 calories per 12 fluid ounce serving,” and the second (Alternative D2) is “no more than 50 calories per 8 fluid ounce serving or 75 calories per 12 ounce serving.”

NAMA believes that expanding the scope of products allowed in the 12 ounce portion size in high schools is appropriate given the increased independence of high school students. The greater selection of beverages may not only discourage students from going off campus to seek alternative beverages, but may also introduce them to the lower-calorie beverages available in the marketplace. If Alternative D2 is selected, NAMA believes that the calorie limit in Alternative D2 should be adjusted to 80 calories per 12 fluid ounces to tie the calorie threshold to mandated labeled calories, consistent with FDA rounding rules (a beverage with 75 calories in a 12 ounce portion would, under FDA rules, be labeled as having 80 calories per the 12 ounce portion).

Additionally, if selected, Alternative D2 would continue to offer an additional, important revenue source for both schools and industry – namely, the sale of regular sports drinks. As recognized by USDA in the preamble to the proposed rule, sports drinks are a group of beverages with “great market strength and consumer appeal” that “might generate significant revenue for schools and student groups.”

#### **1. USDA Should Eliminate the Restrictions on Beverages that can be Offered In Meal Service Areas During Meal Times**

Consistent with its treatment of food, USDA should permit the sale of all eligible beverages without any time and place restrictions. Beverages that are permitted to be sold in schools are lower-calorie, smaller-portioned, and/or nutrient dense.

Moreover, these proposed restrictions create impracticable implementation burdens on food service personnel. Such personnel would be faced with the task of determining what constitutes a “meal service area,” a difficult task given the reality that many gyms serve dual purpose as cafeterias, and many cafeterias are in open areas with borders difficult to define. In addition, schools are facing an ever-expanding definition of “meal service time,” given the serving of breakfast and the staggering of mealtimes.

USDA’s proposed time and place restrictions fail to take into account that high school students have increased independence and expect to be entrusted with a broader array of consumer choices, especially ones that are already lower-calorie and/or nutritious.

## **2. If Alternative D2 is adopted, NAMA Recommends it be Modified to Conform to FDA’s Rounding Regulations**

If Alternative D2 is adopted, NAMA recommends that it be modified in three respects.

First, NAMA recommends removing the restriction on the sale of these beverages to students in the food service area during the meal service period.

Second, Alternative D2 should be adjusted to reflect FDA rounding rules, and to permit beverages labeled as containing 80 calories per 12 fluid ounces to be offered for sale in schools.

Third, NAMA recommends removing the word “serving” from Alternative D2 and D1 because its use is entirely unnecessary and has the potential to confuse manufacturers and food service personnel. In order to maintain consistency and avoid any potential confusion, NAMA recommends deleting the word “serving[s]” from Alternative D2 (and other relevant areas of the proposed beverage standards), and simply base calorie thresholds on a specific amount of fluid ounces (*i.e.*, “8 fluid ounces” versus “8 fluid ounce serving”).

If Alternative D2 is adopted, NAMA recommends that it be modified to read as follows: “No more than 12 fluid ounces of other beverages that are labeled to contain no more than 50 calories per 8 fluid ounces or 80 calories per 12 fluid ounces.” Modifying Alternative D2 in such a manner would be beneficial from both an implementation and enforcement perspective. Specifically, food service personnel would have an easier time assessing product eligibility (by simply reviewing a product label versus trying to determine the exact calorie count of a product), food service personnel would not have to spend valuable time monitoring the time and place of sale of such beverages, and USDA would have an easier time determining school compliance with relevant standards since they would be apparent on the product label.

## **3. NAMA Recommends that USDA Modify the Proposed Standard for Calorie-Free/Diet Beverages**

USDA proposes to permit “[n]o more than 20 fluid ounce servings of other beverages that comply with the Food and Drug Administration requirement for bearing a ‘calorie free’ claim of less than 5 kcal/serving, except that such beverages shall not be available or served to students in the food service area during the meal service period.”<sup>23</sup> NAMA is fully supportive of including calorie-free/diet beverages, but requests that USDA modify the proposed standard for such beverages in three ways.

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<sup>23</sup> 78 Fed. Reg. at 9547.

First, NAMA recommends removing the word “servings” after “20 fluid ounces”. Second, NAMA recommends removing the restriction on the sale of these beverages to students in the food service area during the meal service period. Third and finally, NAMA requests that USDA refrain from tying product eligibility to compliance with FDA’s requirement for bearing a “calorie-free claim.” Tying product eligibility to this requirement would result in the inconsistent treatment of beverages with identical calorie profiles and container sizes.

NAMA recommends that USDA modify the proposed standard for diet/calorie-free beverages to permit “No more than 20 fluid ounces of other beverages that are labeled to contain less than 5 calories per 8 fluid ounces, or less than or equal to 10 calories per 20 fluid ounces.” Deleting the use of the word “servings” (and instead simply referring to “20 fluid ounces”), deleting the time and place restrictions, and tying product eligibility to labeled calories per fluid ounce would result in a more fair, clear, consistent, and easy to implement/enforce standard.

**4. USDA Should Expand the Water Category to Allow for Carbonation and/or Natural Flavors, But Not Sweeteners (Whether Caloric or Non-Caloric)**

The proposed rule would permit the sale of “plain water” in elementary, middle, and high schools, and calorie-free, flavored and/or carbonated water in high schools. NAMA respectfully requests that USDA expand the water category for all ages to allow for carbonation and/or the addition of natural flavors (but not sweeteners whether caloric or non-caloric).

**5. USDA Should Permit the Sale of Diluted Juices (Products Comprised Exclusively of 100 Percent Juice and Water Without Added Sweeteners) for All Ages In Order to Give Schools a Reduced Calorie Option to 100 Percent Juice**

Diluted juices, which are products comprised exclusively of 100 percent juice and water (whether pure or sparkling) without any added sweeteners, offer the health benefits of 100 percent juice at lower calorie levels. The amount of 100 percent juice in a diluted juice may vary, generally between 25-70 percent, with water added at corresponding levels. No additional sweeteners are added to the beverage. NAMA requests that USDA similarly amend its proposed beverage standards to permit the sale of diluted juices for all ages with the same portion size caps as 100 percent juice. Such an action would be a logical and consistent extension of the current regulations - which support the consumption of water, 100 percent juice, and lower-calorie beverages.

**G. Conclusion:**

Thank you for the opportunity to comment on the proposed rule: National School Lunch Program and School Breakfast Program: Nutrition Standards for All Foods Sold in School as Required by the Healthy Hunger-Free Kids Act of 2010. We are available and interested in providing additional information to assist in this ongoing process.

For additional information on these comments or as the USDA prepares rules and guidance please contact:

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Date Submitted: April 9, 2013