



April 10, 2023

Apple Processors Association
1750 K Street, NW, Ste. 700
Washington, DC 20006

Tina Namian
Director, School Meals Policy Division
4th floor, Food and Nutrition Service
1320 Braddock Place, Alexandria, VA 22314

Re: Docket No. FNS-2022-0043 Child Nutrition Programs: Revisions to meal patterns consistent with the 2020 Dietary Guidelines for Americans

Dear Ms. Namian,

Apple Processors Association (APA) is pleased to provide the following comments to the US Department of Agriculture's (USDA) Proposed Rule on Child Nutrition Programs.

APA was founded in 1987 and is a national association of companies that manufacture quality food products, mainly from fresh apples, and the suppliers that provide goods and services to this important market. APA is actively involved in monitoring, educating, and advocating on regulatory and legislative issues that affect our membership, the food industry, and the public.

Our members are proud to be child nutrition program partners producing and providing fresh-pressed apple juice and apple sauce fortified with calcium. APA appreciates the opportunity to submit the following comments.

Apple juice and apple sauce provide nutrition across child nutrition programs

We'd like to take the opportunity to remind the Department and school foodservice providers of the benefits of processed apple products. Apple products, such as applesauce and apple juice, are an easy, convenient, accessible, and cost-effective way for children to obtain their daily fruit servings. Because our food products are processed fresh and packaged in shelf-stable containers, they are ideal for remaining safe and nutritious for long periods of time. While we adore fresh apples, it is important to continue to support and recommend processed food products, especially for schools without adequate refrigerated storage and schools in lower-income areas who need to serve breakfast 'after the bell'.

Apple sauce can help the Department and school foodservice providers meet the Dietary Guidelines.

The USDA database lists one cup of canned applesauce as having 102 calories, with 0.4 grams of protein, 27.5 grams of carbohydrates and 2.7 grams of fiber. It also contains 10 milligrams of calcium, 181 milligrams of potassium, 5 milligrams of sodium, 2.4 milligrams of vitamin C and 71 international units of vitamin A.¹ Promising research results suggest a link between apples or apple products and cardiovascular health, type 2 diabetes, weight control, and cancer.²

100% apple juice can also help the Department and school foodservice providers meet the *Dietary Guidelines*. In fact, one 8 oz. serving of 100% apple juice provides 2 fruit servings and contains only 120 calories.³ 100% apple juice delivers essential vitamins and minerals, such as 120% of the recommended



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amount of vitamin C,³ a crucial nutrient for the growth and repair of cells, building strong bones, healthy teeth, skin, and cartilage, and maintaining a healthy immune system. In fact, apple juice also provides health-promoting plant nutrients like polyphenols.⁴ Juice is an easy, convenient, accessible, and cost-effective way for both children and adults to obtain their daily fruit servings. It is available from a variety of sources year-round and nationwide.^{5,6}

APA supports the updated buy American provisions

APA strongly supports America's farmers and growers. Our members' primary ingredient is apples that are American-grown and, in some cases, locally grown. While we understand some believe the proposed five percent cap on non-domestic foods is too restrictive given growing seasons and climates, APA stands by to provide readily available domestic products for schools to meet meal pattern requirements.

Overall, our members appreciate the opportunity to provide comments on USDA's proposed rule. Apple products across child nutrition programs have an important role in assisting food service professionals meet the meal pattern requirements and helping kids meet the Dietary Guidelines for Americans. Should you have any questions, please contact me.

Respectfully,

Andrea Ball
President
Apple Processor's Association

Works Cited

1. Apple sauce. United States Department of Agriculture Agricultural Research Service National Nutrient Database for Standard Reference. Accessed at: <https://fdc.nal.usda.gov/fdc-app.html#/food-details/171695/nutrients>
2. The Nutrition Source: Apples. Harvard TH Chan School of Public Health. Accessed at: <https://www.hsph.harvard.edu/nutritionsource/food-features/apples/>
3. Apple juice canned or bottled, unsweetened, without added ascorbic acid. United States Department of Agriculture Agricultural Research Service National Nutrient Database for Standard Reference. Accessed at: <https://fdc.nal.usda.gov/fdc-app.html#/food-details/974239/nutrients>
4. Heyman MB, Abrams SA, AAP Section on Gastroenterology, Hepatology, and Nutrition, AAP(American Academy of Pediatrics) Committee on Nutrition. Fruit Juice in Infants, Children, and Adolescents: Current Recommendations. *Pediatrics*. 2017;139(6):e20170967
5. Byrd-Bredbenner, C., Ferruzzi, M. G., Fulgoni, V. L., Murray, R., Pivonka, E. and Wallace, T. C. (2017), Satisfying America's Fruit Gap: Summary of an Expert Roundtable on the Role of 100% Fruit Juice. *Journal of Food Science*, 82: 1523–1534. doi:10.1111/1750-3841.13754



6. Produce for Better Health Foundation. (2015). The impact of policy recommendations with limiting and inclusive language on consumers perceptions and intent to purchase, fresh and packaged forms of fruits & vegetables. Retrieved from www.fruitsandveggies.org.