



Hannah Blaufuss
U.S. Environmental Protection Agency
EPA Docket Center
Office of Land and Emergency Management
1200 Pennsylvania Ave. NW.
Washington, DC 20460

February 2, 2024

**RE: Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics at docket
EPA-HQ-OLEM-2022-0415**

Dear Ms. Blaufuss,

The National Potato Council (NPC) would like to thank the United States Environmental Protection Agency (EPA), Department of Agriculture (USDA), and Food and Drug Administration (FDA) for the opportunity to provide feedback on the Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics (Draft National Strategy). NPC is the leading voice of U.S. potato growers and industry processors. Potatoes are the most widely produced vegetable in the United States, contributing over \$100 billion to the country's economy each year.¹ Potatoes are nutrition powerhouses that contribute key nutrients to the American diet, including vitamin C, potassium, and dietary fiber.

We appreciate the opportunity to provide the government with additional considerations regarding strategies for reducing food waste. Being that potatoes are America's favorite vegetable, they are uniquely positioned among other vegetables to play a role in helping reduce food waste in the United States – especially in U.S. schools. We commend the U.S. government for including actions in the Draft National Strategy that will utilize schools as a setting to help educate children and youth about strategies to reduce food waste. As large-scale food service operations across the country, schools themselves also have a unique opportunity to adopt best practices that can reduce food waste in school cafeterias.

In the comments below, we outline how serving potatoes within school meal programs can achieve "Objective 2: Prevent the waste of food when possible." Considering the objectives of the National Strategy, **we ask that USDA consider the points in upcoming changes to the school meals regulations and permit any vegetable to substitute for fruit within the School Breakfast Program without limitation.**

¹ Knudson, W., & Miller, S. R. Measuring the Economic Significance of the U.S. Potato Industry. February 2023
<https://www.nationalpotatocouncil.org/wp-content/uploads/2023/02/NPCSpudNationReport.pdf>.

Potatoes can reduce food waste within school meal programs

According to USDA's SY2014-15 School Nutrition and Meal Cost Study, vegetables are the most wasted food by students participating in the school meals programs.² In an effort to improve food waste statistics, it is important that schools have the flexibility to serve vegetables such as potatoes that students will consume.

Potatoes are versatile and highly affordable, making it easy for school food service directors to incorporate them into menus. Not only can potatoes be served individually, but they are a "springboard vegetable," meaning they are easily paired with other less-consumed vegetables. Through these pairings, potatoes play a key role in enhancing consumption of the vegetable category overall. New research found that school-aged children waste less vegetables overall when vegetables (E.g., peas and carrots) are paired with well-liked vegetables like potatoes.³ This new study, as well as previous studies, shows that potatoes are valuable components within the School Breakfast Program (SBP) and the National School Lunch Program (NSLP) in helping to introduce children to other types of vegetables and reducing plate waste.^{4,5}

Unfortunately, both the current school meal regulations and USDA's proposed regulatory changes in the 2023 Proposed Rule "Child Nutrition Programs: Revisions to Meal Patterns Consistent With the 2020 Dietary Guidelines for Americans" arbitrarily limit opportunities to increase vegetable consumption using potatoes within the School Breakfast Program.

If USDA's 2023 proposed changes are finalized, then it will update the school meals regulations such that *"schools that substitute vegetables for fruits at breakfast more than one day per school week would be required to offer a variety of vegetable subgroups. In other words, schools that substitute vegetables more than one day per school week would be required to offer vegetables from at least two subgroups."* USDA provides an example of if a school offers a starchy vegetable on a Monday, they will then need to offer different vegetable subgroup on a different day before offering a starchy vegetable again.

NPC understands the desire to ensure a variety of vegetables are served within school meal programs, but simply mandating that schools serve different subgroups of vegetables does not mean children will consume them. For example, if a school meal operator chooses to serve roasted potatoes with eggs at breakfast instead of fruit on Monday, they could not be reimbursed for the potatoes served on Wednesday in a "Potatoes O'Brien" (a popular vegetable hash of diced potatoes, green and red peppers, onions, garlic, and spices). If a school decides to substitute a

² https://fns-prod.azureedge.us/sites/default/files/resource-files/SNMCS_Summary-Findings.pdf

³ <https://www.mdpi.com/2072-6643/15/21/4496>

⁴ Capps et al. Examining vegetable plate waste in elementary schools by diversity and grade. *Health Behavior and Policy Rev.* 2016;3(5):419-428(10).

⁵ Ishdorj A, Capps Jr. O, Storey M, Murano PS. Investigating the relationship between food pairings and plate waste from elementary school lunches. *Food and Nutrition Sciences.* 2015;06(11):1029-1044.

doi:10.4236/fns.2015.611107

vegetable for fruit two days a week, they should be able to choose any vegetable that they believe will be accepted by children.

In an effort to reduce vegetable waste and increase consumption, NPC maintains that all vegetables should be permitted to substitute for fruit within the SBP without limitations or restrictions. As the government finalizes the National Strategy for Reducing Food Loss and Waste and Recycling Organics, **we ask that USDA take action to change the school meals regulations to permit any vegetable to substitute for fruit within the School Breakfast Program without limitation.**

We thank you for the opportunity to provide these comments to the U.S. government and hope that you will consider these recommendations as you finalize the National Strategy for Reducing Food Loss and Waste and Recycling Organics. We strongly believe that these additional actions will help to reduce vegetable food waste in the school meals programs.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Kam Quarles". The signature is fluid and cursive, with the first name "W." and last name "Quarles" clearly visible.

W. Kam Quarles
Chief Executive Officer
National Potato Council