Comments by the
National Milk Producers Federation and the U.S. Dairy Export Council
USDA Request for Information Non-Emergency Title II Food for Peace Program

July 24, 2026

The National Milk Producers Federation (NMPF) and the U.S. Dairy Export Council (USDEC) appreciate the opportunity to submit comments to USDA on non-emergency Title II Food for Peace programming. Our organizations welcome the Administration's decision to move the administration of the Food for Peace program to USDA, the agency best fit to serve the program's dual purpose of supporting U.S. agricultural producers while ameliorating chronic hunger and malnutrition worldwide. Housing this program within USDA better aligns U.S. international food assistance with the agricultural expertise, commodity knowledge, and producer relationships needed to ensure the program continues to deliver high-quality American commodities to those most in need, while strengthening the connection between U.S. farmers and the humanitarian mission the program serves.

NMPF develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. The members of NMPF's cooperatives produce over two thirds of the U.S. milk supply, making NMPF the voice of dairy producers on Capitol Hill and with government agencies. NMPF provides a forum through which dairy farmers and their cooperatives formulate policy on national issues that affect milk production and marketing. NMPF's contribution to this policy is aimed at improving the economic interests of dairy farmers, thus assuring the nation's consumers an adequate supply of pure, wholesome, and nutritious milk and dairy products.

USDEC is a non-profit, independent membership organization representing the global trade interests of U.S. dairy farmers, dairy processors and cooperatives, dairy ingredient suppliers and export trading companies. Its mission is to enhance U.S. global competitiveness and assist the U.S. industry to increase its global dairy ingredient sales and exports of U.S. dairy products. USDEC and its 130-plus member companies are supported by staff in the United States and overseas in Mexico, South America, Asia, Middle East and Europe.

First, we want to express our strong support for the Food for Peace program and encourage USDA to ultimately build on the program to consistently incorporate a wider group of nutrient-rich products into U.S. food aid programming in the future. The most recent update of the Global Report on Food Crises found that at least 266 million people around the world

are acutely food insecure, with the share of the analyzed population facing high levels of acute food insecurity nearly doubling compared with 2016.[1]

U.S. dairy products can play a vital role in delivering a higher nutritional content in U.S. food aid products. To that end, looking forward, it is critical that USDA broadens the products that they procure and distribute as U.S. food aid to include more consistent use of U.S. dairy products by implementing partners.

While not the subject of this comment opportunity, NMPF and USDEC express their continued support for Ready-to-Use Theraeputic and Supplemental Foods for emergency Food for Peace programming as a critical initiative that simultaneously supports U.S. dairy producers and the most vulnerable globally.

Dairy Products for Non-Emergency Food Aid

1. **Milk Powder**
   First, USDA should consider greater use of milk powder (allowing for use of nonfat dry milk, skim milk powder and whole milk powder) in controlled settings, such as a part of school milk programs or other controlled environment settings that also include adults. Obtained by removing water from pasteurized milk, milk powder is an easily storable and transportable product that can be used to produce recombined or reconstituted milk.

   To mitigate potentially poor water quality in some of these locations, entities utilizing the milk powder would simply need to boil the water prior to mixing it with milk powder, an easy step that is already used in the many food aid scenarios where a porridge of grain blends is served.

   USDA should refrain from sending food aid milk powder to uncontrolled settings, such as sending the product home with children or distributing it directly to families for home use, due to the higher risk of breast-feeding displacement that exists in the countries where U.S. food aid programs typically operate.

2. **SuperCereal+ Formulations**
   Secondly, USDA should consider increasing allocations for SuperCereal+ formulations that incorporate dairy ingredients. SuperCereal+ is a combination of fortified wheat, soy, and milk blends that can be made into porridge or gruel. Increased allocations to production and transportation would benefit several American farmers and businesses at the same time. When working toward an increase in food security, designating increased funding for SuperCereal+

[1] https://openknowledge.fao.org/server/api/core/bitstreams/86067cbb-9396-4e7d-8d19-e60ad00d2f73/content

formulations that incorporate U.S. milk powders can make use of an already widely available, affordable commodity.

High Quality, Affordable Nutrition

Across the world, it is estimated that 266 million people are at risk of acute hunger in 2026. With the main causes of food insecurity being conflict and climate crisis, it is crucial that high-quality and long-lasting food is available. Milk powder and SuperCereal+ formulations provide nutritious meals to increase food security with little work required.[2]

To that end, dairy foods and ingredients, including milk and its derivative products such as milk powder and dairy proteins, can and should be included in the United States' global food and nutrition strategy. These products provide essential nutrients, including high-quality protein, phosphorus, potassium, calcium, iodine, selenium, zinc and vitamins A, B2, B3, B5, and B12, which are often missing in the diets of young children and adolescents.

Table 2: Amino Acid Composition of Milk Powders, Select MPCs and MPI

AMINO ACID (g/100 g OF PRODUCT)	SKIMMED MILK POWDER[1]	WHOLE MILK POWDER[2]	MPC40[3]	MPC70[3]	MPC85[3]	MPI[3]
Isoleucine	2.19	1.59	1.69	3.17	3.75	3.83
Leucine	3.54	2.58	3.15	5.83	6.86	6.98
Valine	2.42	1.76	2.04	3.75	4.46	4.51
Histidine	0.98	0.71	0.92	1.70	2.01	2.06
Lysine	2.87	2.09	2.65	4.96	5.90	5.98
Methionine	0.91	0.66	0.66	1.52	1.88	2.01
Phenylalanine	1.75	1.27	1.63	3.00	3.54	3.57
Threonine	1.63	1.19	1.37	2.56	2.98	3.00
Tryptophan	0.51	0.37	0.47	0.87	0.96	1.02
Alanine	1.25	0.91	0.96	1.77	2.11	2.16
Arginine	1.31	0.95	1.19	2.18	2.62	2.66
Aspartic acid	2.74	2.00	2.49	4.60	5.37	5.45
Cystine	0.33	0.24	-	-	-	-
Cysteine	-	-	0.24	0.43	0.51	0.52
Glycine	0.77	0.56	0.55	0.97	1.13	1.15
Glutamic acid	7.57	5.51	6.98	12.95	15.20	15.45
Proline	3.50	2.55	3.03	5.71	6.67	6.95
Serine	1.97	1.43	1.60	3.07	3.57	3.53
Tyrosine	1.75	1.27	1.67	3.23	3.89	3.93

Values reported are for [1]Milk, dry, nonfat, regular without added vitamin A and vitamin D; and [2]Milk, dry, whole, without added vitamin D, respectively.[3]USDEC: Medallion Labs average analysis of industry samples (MPC40: n=1, MPC70: n=3, MPC85: n=2, MPI: n=4).

As illustrated above, dairy ingredients present several benefits as high quality proteins that are rich in essential, branched chain and sulphur-containing amino acids, which are important for growth. The branched chain amino acids, particularly leucine, play an

[2] https://www.wfp.org/global-hunger-crisis

important role in enhancing and maintaining muscle mass and promoting lean body growth.

SuperCereal+ is a fortified blended food that packs 410 calories per 100 grams of dry matter, with a nutritional profile of 19% protein and 9% fat. This relatively high protein and fat content comes from the inclusion of dairy ingredients, typically dried skim milk, which boost both the quality and digestibility of the protein while adding valuable micronutrients like calcium that aren't as readily available from plant sources alone. Beyond dairy, SuperCereal+ typically combines corn and soy with added vitamins and minerals, making it a nutrient-dense option designed to help prevent and treat malnutrition, particularly among vulnerable groups like pregnant and lactating women and young children in food assistance programs.[3]

The incorporation of milk powders to support school milk programs globally would complement the Trump Administration's efforts to secure new market access concessions for U.S. dairy products. Incorporation of school milk in eligible developing markets sets a critical foundation via (1) incorporation of nutrient-dense products to children in their most critical growth stages and (2) development of a dairy consumer base to turn aid into trade opportunities. While many countries do have some level of school milk programs, milk is often not provided daily and universally to ensure all school children can consume it each day. Greater use of U.S. milk powder through food aid programs could play a vital role in complementing local milk supplies to expand the reach of these programs.

Product Availability

The United States produces 60,000 metric tons of whole milk powder (WMP) and 995,000 metric tons of nonfat dry milk / skim milk powder (NFDM/SMP) per year. Processing facilities for NFDM/SMP are available across the United States. There are currently facilities producing SuperCereal+ formulations in North Carolina and Wisconsin.

Highly Regulated and Safe

Nonfat dry milk is strictly defined as having no more than 5 percent by weight of moisture, and not more than 1.5 percent by weight of milkfat unless otherwise indicated.[4] Although an FDA standard does not exist for skim milk powder, an international Codex standard exists for it and has the same requirements regarding ensuring the product has no more than 5 percent by weight of moisture, and not more than 1.5 percent by weight of milkfat.

[3] https://www.ams.usda.gov/sites/default/files/media/scp1.pdf
[4] https://www.ecfr.gov/current/title-21/chapter-I/subchapter-B/part-131/subpart-B/section131.125

Similarly, whole milk powder must contain no less than 26 percent and no more than 40 percent by weight of milk fat alongside containing no more than 5 percent by weight of moisture on a milk solids not fat basis.[5]

SuperCereal+ formulations are held to a list of analytical requirements, including a minimum of 17 percent protein and a maximum of 10 percent moisture. Specific packaging requirements are also provided for SuperCereal+ formulations, detailing the size, weight, and materials needed.[6]

Durable and Ready to Ship

Several types of packaging are approved for dairy powders. The more durable and most frequently used type is a multi-wall Kraft paper bag with an inner low-density polyethylene (LDPE) bag liner, both of which are heat sealed. This type of bag construction is referred to as a "bag within a bag."

For commercial sales, packaging differs in the thickness and number of layers of Kraft paper and the thickness and material of the bag liner. The combination of a 3-4 ply multi-wall Kraft paper bag and 3-4 mil thickness LDPE bag liner offers good protection during storage and handling. The LDPE bag liners have vents to allow air to escape from the bag. This prevents rupture during handling and storage. There are different technologies available to reduce the amount of air and moisture getting into the dry dairy product through these vents; the technology varies by bag manufacturer.

USDA specifies bag construction for NFDM/SMP and WMP, similar to SuperCereal+ for use in food assistance programs.[7] The packaging is to be the equivalent of a 3-ply Kraft paper with a total basis weight of 81.6 kg (180 lbs.) and a LDPE inner liner thickness of at least 3 mil. The maximum water-vapor transmission of the film at 90 - 95 percent relative humidity at a temperature of 37.8°C shall be 0.45 g per 645 square cm in 24 hours.[8] Requirements for SuperCereal+ differ slightly as the packaging must be mad of woven polypropylene rather than Kraft paper and a specific label including the product name and a logo.

For NFDM/SMP and WMP, the bags are typically piled onto pallets, with a piece of cardboard in between, and shrink wrapped in plastic for ease of storage and transportation. While refrigeration of the dry ingredients is optimal, they are shelf stable. Exposure to high temperature and humidity during storage and transport will merely shorten the shelf-life expectancy of the ingredients, not spoil them.

Manufacturers conduct shelf-life testing on their respective products in their respective packaging. Typical shelf-life of SMP and NFDM is a minimum of 12-18 months at ambient temperature at maximum relative humidity of 65% dependent upon packaging. Like NFDM

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[5] https://www.ecfr.gov/current/title-21/chapter-I/subchapter-B/part-131/subpart-B/section-131.147
[6] https://www.ams.usda.gov/sites/default/files/media/scp1.pdf
[7] https://www.ams.usda.gov/sites/default/files/media/scp1.pdf
[8] https://www.dairyglobalnutrition.org/safety-and-quality/shelf-life-and-packaging

and SMP, WMP has a typical shelf-life of 18-24 months for nitrogen-flushed bags when maintaining below 65% relative humidity. SuperCereal+ has a typical shelf-life of 12-18 months when stored in a dry place.

Adverse conditions that might be expected in developing countries (i.e., high humidity and temperatures) could shorten the shelf-life expectancy of these ingredients. However, packaging, including the use of a specific poly liner to allow less transmission, may enhance the protection of the product. NFDM/SMP can be hygroscopic and tend to attract water from humid atmosphere. Over time, the powders will become more sticky, caked or lumpy and exhibit reduced flowability and solubility. While these changes may affect the ease of use of the product, the color and the flavor, they do not represent a health or safety problem. It is only when the powder's moisture content exceeds 15%, that it then becomes susceptible to microbiological growth and should not be used.

Conclusion

Given the nutritional and economic value of the dairy products outlined above, NMPF and USDEC urge USDA to invest in increasing the amount of milk powder in school lunch programs around the world, and to increase its allocation to SuperCereal+ formulations incorporating dairy ingredients to increase food security while benefitting American producers.

On behalf of NMPF and USDEC's 130-plus member companies, we appreciate the opportunity to provide comments on this important issue, and we remain available to provide any further clarification as needed.

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