



January 29, 2010

Debra Whitford
Director, Supplemental Food Programs Division
Food and Nutrition Service
U. S. Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, VA 22302

RE: Docket ID Number 2006-0037, WIC Food Packages Interim Rule

Dear Ms. Whitford:

United Fresh Produce Association strongly supports the revisions in the WIC Food Packages Interim Rule published in the Federal Register on December 6, 2007.

Founded in 1904, United Fresh Produce Association represents the interests of more than 1,500 member companies from small family businesses to the largest international corporations throughout the global fresh produce supply chain, including growers, shippers, fresh-cut processors, wholesalers, distributors, retailers, foodservice operators, industry suppliers and allied associations.

The Interim Rule allowed for the addition of fresh fruits and vegetables to WIC Food Packages for the first time. The addition of fruits and vegetables is one of the most popular and well received changes in the WIC Food Packages. Now, more than 9.4 million WIC moms and children receive monthly cash-value vouchers for fruits and vegetable --- increasing their overall consumption of fruits and vegetables, improving their nutrient intake and promoting healthier eating habits now and in the future.

We applaud USDA and State WIC Agencies for successfully implementing the interim rule nation-wide by October 1, 2009. The response from participants, state and local WIC agencies, vendors and other stakeholders is overwhelmingly positive.

Then new and improved WIC food packages provide WIC families with food choices that are consistent with current nutritional recommendations and that appeal to the diverse population served by WIC. We believe that these changes, coupled with nutrition education, will improve the health of WIC families.

As USDA finalizes the WIC Food Package rule, United Fresh is pleased to submit the following recommendations:

1. Increase the cash-value of the fruit/vegetable voucher for WIC children to \$8/month as originally recommended by the Institute of Medicine

We applaud Congress's decision in the FY2010 Agriculture Appropriations Act to increase the cash-value of the WIC fruit/vegetable vouchers for women to \$10/month and the interim rule published on December 31, 2009 that instructs State WIC Agencies that they can implement this change immediately or by April 30, 2010.

Now, it's time to increase the cash-value of the fruit and vegetable voucher for WIC's 4.7 million children to \$8/month as originally recommended by the Institute of Medicine's (IOM) Report: *WIC Food Packages: Time for a Change*.

Because of the importance of doubling fruit and vegetable consumption for all children in the United States to meet the 2005 Dietary Guidelines for Americans, the vulnerable WIC population should not be short changed. An important objective of the IOM was to ensure that the new WIC Food Packages would provide at least one additional serving of fruit or vegetable each day. It is not possible to add one additional daily serving of fruits and vegetables for \$6/month.

Therefore, we strongly recommend that the cash-value of the children's fruit/vegetable voucher be increased to \$8/month as recommended by the IOM.

2. Increase the cash-value of the fruit/vegetable voucher for fully breastfeeding women to \$12/month to incentivize WIC moms to breast feed their babies.

We applaud USDA's Food and Nutrition Service for providing fully breastfeeding WIC mothers with a \$10/month voucher for fruits and vegetables in the interim rule. This additional \$2/month for fruits and vegetables, above the \$8/month that non-fully breastfeeding WIC Moms receive, was designed to incentivize the food package for fully breast feeding Moms. The extra \$2/month for fruits and vegetables contributed to the overall enhanced value of the food package for women who choose to fully breastfeed.

Now that non-breastfeeding WIC Moms receive vouchers for \$10/month for fruits and vegetables, we support the National WIC Association's request to increase the cash-value of the fruit/vegetable vouchers for fully breastfeeding WIC Moms to \$12/month.

Therefore, we strongly urge USDA's Food and Nutrition Service to increase the cash-value of the fruit/vegetable vouchers for breastfeeding Mothers to \$12/month. This will enhance the value of the food package for breastfeeding mothers and encourage more WIC mothers to breastfeed their babies.

3. Require State WIC Agencies to allow split tender to enable WIC families to maximize the full benefit of their fruit/vegetable vouchers. Provide technical assistance to facilitate and ensure state adoption.

Split tender provides WIC families with the ability and option to add cash to their fruit/vegetable voucher purchases at check out so they can fully maximize their benefits.

Currently, 12 State WIC Agencies including: Colorado, Delaware, Illinois, Maine, Massachusetts, Mississippi, Missouri, Montana, New Hampshire, Texas, Utah, and Wyoming disallow split tender. The result is that WIC families in these states have to put a fruit/vegetable item back so they do not go over the cash value of their

fruit/vegetable voucher. The ultimate result is that they are never able to realize the full value of their \$6/month or \$10/month benefit for fruits and vegetables.

Disallowing split tender negatively impacts public health for the vulnerable WIC population in these 12 states. This decision impacts 2 million WIC participants which is approximately 22% of the total WIC population.

In the interim rule USDA's Food and Nutrition Service encouraged State WIC Agencies to allow split tender. Thirty-eight State WIC Agencies followed this recommendation and allow split tender. States report no problems from retail vendors with implementation. There also appears to be no problem with small vendors in these 38 states.

If the issue in the 12 states disallowing split tender is of concern for small vendors, then perhaps an exception can be made for these vendors or a phase in period that allows State WIC Agencies to work with these vendors to bring them into compliance. Also, 38 State WIC Agencies are making this work. USDA can promote best practices and provide technical assistance to resolve the disparity.

Therefore, we strongly recommend that USDA require State WIC Agencies to allow split tender so that WIC families can realize the full value of their fruit and vegetable vouchers. We also recommend that FNS provide support and technical assistance to State WIC Agencies to facilitate and ensure that states allow participants to pay the difference when the price of fruits and vegetables exceed the value of the fruit/vegetable voucher.

4. Recommend periodic review and updates of the WIC Food Packages at least every ten years.

Again, we commend USDA-FNS for the Interim Final Rule providing for major, critically important changes to the WIC food packages, including the addition of fresh fruits and vegetables. Since WIC is one of our nation's premier public health nutrition programs, we believe it is critically important to periodically review the food packages to ensure they reflect the most recent science and are aligned with current Dietary Guidelines for Americans.

Therefore, we recommend that the WIC food packages be scientifically reviewed and updated every 10 years. This ensures that the WIC program continues to effectively contribute to improving the life-long health of the nation's at-risk women, infants and children.

5. Allow Fresh White Potatoes in WIC

We are disappointed that USDA's Interim Rule excluded fresh white potatoes as an allowable fresh vegetable. We strongly recommend that all fresh fruits and vegetables, including fresh white potatoes, be eligible for purchase using the WIC Fruit/Vegetable vouchers. We believe that it is important to maximize choice for WIC families. Additionally, fresh white potatoes contain key nutrients of concern (Vitamin C and potassium), are nutrient dense, economical, and well liked by every socioeconomic, cultural and ethnic group. USDA should allow fresh white potatoes, like all other fresh fruits and vegetables, to be included in WIC.

- **Potatoes Contain Key Nutrients “Of Concern”** - The 2005 Dietary Guidelines for Americans identified several “*nutrients of concern*”; that is nutrients most likely to be consumed in low amounts by both adults and children. Both vitamin C and potassium have been identified as “*nutrients of concern*.” Fresh white potatoes are high in vitamin C and potassium and contain dietary fiber. A medium white potato (5.3 oz) eaten with the skin provides 45% of the Daily Value (DV) for vitamin C. And, a medium white potato provides 620 mg of potassium; making potatoes one of the richest sources of potassium among the 20 most frequently eaten fresh fruits and vegetables. Thus, fresh white potatoes contain key nutrients that are not adequately consumed by most Americans and can therefore contribute to healthy eating habits.
- **Exclusion sends wrong nutrition education message to WIC families** - The exclusion of one specific type of fresh vegetable, i.e. fresh white potatoes, sends the wrong message to WIC Moms, suggesting that fresh white potatoes are not a healthy choice. It is important to note that including fresh white potatoes in the WIC program can also help moms and kids better understand the nutritional profile difference between fresh white potatoes and French fries, thus enhancing long-term nutrition education. From a practical level, WIC nutrition educators should be focused on positive, reinforcing messages emphasizing the importance of eating more fresh fruits and vegetables and on eating a wide variety of nutrient dense fruits and vegetables, rather than spending valuable time explaining why fresh white potatoes are excluded. Also, including fresh white potatoes in WIC food packages would align with the allowable foods list for the WIC Farmers Market Nutrition Program (FMNP).
- **Allowing Full Choice Works** - WIC families selected a wide variety of nutrient dense fresh fruits and vegetables, including white potatoes, when provided with fruit/vegetable vouchers in the three WIC Fruit and Vegetable demonstration projects conducted in California and New York State. Each of these projects allowed WIC families to purchase fresh white potatoes along with all other fresh vegetables with their vouchers. WIC Moms made wise choices, choosing a wide variety of fresh fruits and vegetables, when allowed to make their own purchase decisions in the produce department.
- **Potatoes Are Economical and Maximize WIC Food Dollars** – Including a monthly voucher for fruits and vegetables was one of the most significant revisions to the WIC food package and will result in increased consumption. Nonetheless, it is important to emphasize that the cash-value of the vouchers are fixed and limited; thus, it is important for WIC families to choose fruits and vegetables that provide the greatest “nutritional value.” Fresh white potatoes are economical and maximize WIC food dollars. The Affordable Nutrient Index, developed by Dr. Adam Drewnowski at the University of Washington, is a measure of nutrients per dollar. Fresh white potatoes score very high; a higher score is indicative of greater nutrients per dollar. White potatoes also scored very high on Dr Drewnowski’s Nutrient Rich Food Index. Thus, considering both nutrient density and affordability, white potatoes excel. White potatoes, therefore, offer WIC families a cost-effective means to include important nutrients in their diet.

- **Potatoes Are Well-liked By Virtually Every Socioeconomic, Cultural and Ethnic Group** - Potatoes are widely accepted across cultures and among ethnicities and are particularly important to those served by WIC. In fact, The IOM committee report from which the interim WIC ruling was derived acknowledges that potatoes are a “core food” for many WIC-eligible participants. The report further acknowledges that the intent was to design a WIC food package that would serve as an *incentive* for participation in the WIC program.
- **Easier at retail check out** - Finally, including fresh white potatoes will make it easier for supermarket cashiers to handle and process the Fruit/Vegetable vouchers at check-out.

Therefore, we strongly urge USDA to include fresh white potatoes as an allowable fresh vegetable in the WIC Food Packages. Fresh white potatoes are a very nutritious, economical and well-liked vegetable. They should be included on the WIC food list.

In conclusion, United Fresh Produce Association commends the USDA for the effective implementation of the new WIC Food Packages. These historic changes are already improving the eating habits and health of more than 9.4 million WIC participants. Thank you for the opportunity to contribute suggestions on how to strengthen the WIC Food Packages final rule.

A handwritten signature in black ink that reads "Lorelei DiSogra". The signature is written in a cursive, flowing style.

Lorelei DiSogra, EdD, R.D.
Vice President, Nutrition and Health
United Fresh Produce Association
1901 Pennsylvania Ave, NW Suite 1100
Washington, DC 20006