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Ms. Patricia Daniels  
Director, Supplemental Food Programs Division  
USDA, Food and Nutrition Service  
3101 Park Center Drive, Room 520  
Alexandria, Virginia 22302

Dear Ms. Daniels: *Pat*

Thank you for the opportunity to comment on revisions to the WIC food package. The WIC food prescription is key in assisting program participants achieve and maintain healthy dietary patterns and prevent nutrition-related conditions and diseases. Revising the WIC food package to be more consistent with current dietary recommendations is essential for the continued success of our program.

In particular, there are five areas we feel are crucial to ensure consistency with current nutritional recommendations of the Dietary Guidelines for Americans and the Food Guide Pyramid.

- Offer choices that allow for diverse cultural and religious dietary preferences.

The WIC food package does not allow for the necessary flexibility to accommodate the diverse cultural and religious dietary preferences of various populations served.

For example, the current food package does not recognize the needs of cultures that do not drink cow's milk or eat dairy products. This is a significant problem for WIC agencies serving large numbers of Asians and other ethnic groups whose traditional diet does not include dairy products or with a high incidence of milk allergy or lactose intolerance.<sup>1,2,3,4</sup>

Currently, WIC Food Package III for Children and Women with Special Dietary Needs with soy formula is the only possible option to accommodate milk allergy or lactose intolerance. However, offering soy formula as a substitute for cow's milk is inappropriate and does not support cost containment efforts. In addition, participants must forfeit other beneficial and culturally acceptable WIC allowed foods such as eggs, peanut butter, and beans.

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Alternately, if the standard WIC food package is provided to these participants, then a substantial portion of the WIC food prescription will not be utilized since dairy products account for a large proportion of the WIC foods offered. Either way, these WIC participants are not able to maximize program food benefits effectively.

Further, there are religious groups, such as Jains and strict-practicing Seventh-Day Adventists, in addition to practicing vegans, for whom consumption of animal products is prohibited. For these program participants, there are several food items, namely milk, cheese, eggs and tuna, that are not utilized with no accommodations or options available. Clearly these participants gain little with respect to program food benefits provided.

A solution to this problem is to allow states versatility to incorporate more foods that reflect cultural and religious dietary patterns. In the case of cow's milk, examples of appropriate substitutions include calcium-fortified soymilk, calcium fortified rice milk and calcium fortified tofu. Appropriate substitutions for cheese, eggs and tuna include beans, tofu and peanuts.

- **Offer more fiber-rich foods such as grains, vegetables, and fruits from the base of the Food Guide Pyramid for all adult and child categories.**

Providing more food proportionally from the base of the Food Guide Pyramid is essential for the WIC food package to be compatible with the Dietary Guidelines for Americans. The dietary guidelines recommend that most of the calories come from the base of the Food Guide Pyramid, specifically grain products, vegetables, and fruits.<sup>5</sup> The WIC food package often provides high-fat servings from the top rather than the base of the Food Guide Pyramid. Depending on cereal choices made, the overall fiber content provided can also be very low.<sup>6</sup>

Currently, a two-year-old WIC participant is provided only 30% of their grain/bread servings from the standard WIC food package. However, that same two-year-old receives 160% of their milk servings from the food package.<sup>6</sup> In addition, the food package offers only breakfast cereals from the grain group, which does not complement supplementation at other meals during the day. Offering more servings and choices of grain products is an effective measure to make the WIC food package more consistent with the Food Guide Pyramid guidelines.

Another effective measure to make the WIC food package more consistent with United States Department of Agriculture dietary guidelines, in addition to helping meet Healthy People 2010 objectives,<sup>7</sup> is to provide servings from fruits and vegetables which are more proportionate with the Food Guide Pyramid recommendations.

Cost has been a factor associated with not meeting consumption goals of fruits and vegetables.<sup>8</sup> Moreover, studies by the United States General Accounting Office (GAO) found that WIC participants were falling short of meeting these consumption goals. The GAO reported that participants would benefit from inclusion of fruits and vegetables to the WIC food package, which would assist them in better achieving these consumption goals.<sup>8</sup>

Currently, no servings from the vegetable group are provided to participants except exclusively breastfeeding women who receive carrots. Further, the only form of fruits provided is from the inclusion of juice. WIC participants are not able to reap the health benefits from dietary fiber provided by whole fruits and vegetables.

In addition, fruit juice is often easily over-consumed by toddlers. For the two-year-old WIC participant, the food package provides 115% of their fruit servings with only juice. According to the American Academy of Pediatrics, over consumption of juice by children can contribute to obesity, development of dental caries, diarrhea and other gastrointestinal problems.<sup>9</sup> Offering whole fruits and vegetables and other fiber-rich foods to the WIC food package is a solution to these diet-related problems.

Selection Criteria – Grains: Selection criteria for grain products should include foods that are low in sugar and fat, and enriched with iron, folic acid and other B vitamins. A portion of the grain products should be high in fiber. Suggested items to include are whole grain bread, whole wheat and corn tortillas, brown and enriched rice. These foods could partially replace milk in the current food package. This replacement would support cost containment efforts in addition to supporting traditional healthy consumption patterns.

Selection Criteria - Fruits and Vegetables: Selection criteria for fruits and vegetables should include foods that are nutrient-dense, such as those high in vitamin A, vitamin C and/or folic acid. Suggestions for nutrient-dense foods include broccoli, carrots, citrus, dark leafy greens, papaya, sweet potatoes and tomatoes. These foods could partially replace juice in the current food package. Again, this replacement would support cost containment efforts and enhance the nutritional benefits of the current food package.

States should have the flexibility to select culturally acceptable foods that have year-round availability, and are at low to moderate prices. Because not all states participate in the Farmers' Market Nutrition Program (FMNP) these foods should be offered in addition to any produce available through FMNP.

- **Offer options that accommodate food allergies.**

Milk, eggs, peanuts and wheat are some of the most common food allergens reported.<sup>10</sup> However, these foods are all standard items of the WIC food packages for adults and children. Although there are options for those suffering from peanut and wheat allergies, there are no available appropriate accommodations for those with allergies to milk or eggs. It is important that WIC provide options to address these allergies and accommodate participants so that they may fully use their food benefits. Examples of appropriate substitutions for milk include calcium fortified soy or rice milk. Examples of appropriate substitutions for eggs include tofu or beans.

The enhanced food package for exclusively breastfeeding women provides canned tuna; it does not address needs of individuals that are allergic to fish and other seafood products. Allergic reactions to fish and shellfish are commonly reported in both adults and children.<sup>10</sup> The current food package provides no options for these participants.

The enhanced food package for exclusively breastfeeding women was designed to promote breastfeeding by offering incentive food items and to provide for their higher nutritional needs. Therefore, for this food package to be effective, it is crucial that the food items offered are acceptable and appropriate to ensure maximum utilization. Examples of appropriate substitutions include canned chicken or tofu.

- **Offer foods that do not require lengthy preparation time.**

Beans are a low fat, nutrient dense, high fiber food that can be an important part of a healthy diet. However, results from WIC participant surveys have shown that dried beans are often underutilized due to the difficult and lengthy preparation required. A practical solution to this problem is to allow participants the option to select beans that are canned instead of dried.

- **Offer food options that do not expose participants to methylmercury.**

Fish can be a healthy, high-protein food that is part of a balanced diet. However, some fish contain levels of mercury, a neurotoxicant, that may be harmful to the developing brain.<sup>11,12</sup> Furthermore, mercury bioaccumulates in the body.<sup>12</sup> Therefore, it is important for pregnant women, breastfeeding women, and small children to limit their intake of mercury from all potential sources of contamination. Depending on the amount and types of fish consumed, there are many WIC participants throughout the program who may be at risk for unsafe levels of mercury exposure and the resulting adverse health effects.


The Hawaii WIC Program is grateful for the recent USDA dispensation which allows canned salmon as a substitute for canned tuna for the enhanced food package for exclusively breastfeeding women. This substitution helps to reduce mercury exposure to Hawaii WIC participants who are at risk due to their high consumption of fish.

Canned tuna, a food item on the enhanced food package for exclusively breastfeeding women, is an identified source for mercury.<sup>13</sup> Benefit foods issued by the WIC Program should not contribute to this serious health safety problem. A more prudent approach is to provide food options to all states to minimize potential safety risk to WIC participants who consume fish regularly in their diet. Hence, we strongly recommend that other food options be made available immediately for items that are not sources for mercury to accommodate participants who consume large amounts of fish in their diet. Examples of appropriate substitutions include canned chicken, canned salmon or canned sardines.

In summary, the WIC food package must be revised to become more consistent with current dietary recommendations. This will enable government-sponsored nutrition programs such as WIC to promote good nutrition and better health. We can then provide a clear consistent message to the public with an effective supplemental food package.

Please do not hesitate to call me at (808) 586-8191 with any questions.

Sincerely,



Linda Chock, M.P.H., R.D.  
Chief, WIC Services Branch

Attachment

- c Cordelia Fox, Regional Director  
USDA, FNS, WR  
Cultural Food Package file  
Branch Secretary

## References

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