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Ms. Patricia Daniels
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Programs Division
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Re: Revisions to the WIC Food Packages

On September 15, 2003 the Food and Nutrition Service (FNS), USDA, published an Advanced notice of proposed rule making in the Federal Register [Volume 68, Number 178, pages 53903-53910]. The following are comments submitted by Welch Foods Inc.

SUMMARY: The FNS Advanced Notice states that the WIC food packages were last revised in 1980, and that in the intervening years obesity and inappropriate dietary patterns have become of increasing concern. Part of the proposed revision is to decrease the maximum monthly allowances of 100% fruit and/or vegetable juices so as to keep the program cost neutral while adding fresh fruits and vegetables. Welch Foods Inc. wishes to provide evidence that 1) the current allotments of fruit/vegetable juices do not contribute to infant or childhood overweight or obesity; 2) the inclusion of 100% juices fosters good dietary habits and reduces/delays introduction of soda and sweetened beverages into children's diets; 3) fruit/vegetable juices are very important sources of flavonoids – to wit, the establishment by the USDA of a foods database on flavonoid content of selected food and future intent to recommend a flavonoid intake; 4) the convenience of juice consumption draws women, infants and children into the WIC program, where they receive health screening and counseling, including weight management counseling, and finally; 5) as the current WIC Food Packages are maximum monthly allowances and serve as guidelines to the individual states, the states already have the discretion to modify the packages to meet cultural and nutritional needs of WIC participants, including ethnically diverse subpopulations that make up an increasingly large percentage of WIC participants.

- 1) **Current allotments of fruit/vegetable juices do not contribute to infant or childhood overweight or obesity.**

The WIC Food Packages were last revised in 1980. Since that time there has been a marked increase in childhood overweight and obesity, but as the prevalence of these conditions is similar for WIC and non-WIC children, and the increases have occurred during a period with no change to the Food Packages, it is unlikely that any part of the food package, including the

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current maximal juice allotments of 288 fluid ounces/month (9-10 oz/day) for children ages 1-5 years and 96 fluid ounces for infants 4-12 months of age, is responsible for the increase.

In contrast, children's consumption of soft drinks has increased by two-thirds during the last 25 years. About half of preschool age children consume soft drinks on a regular basis. School age children do not compensate for the beverage calories, so for children drinking ≥ 265 mL/day their total caloric intake was 188 kcal/day more than that of children who did not consume any soft drinks (Harnack 1999). Adults show a similar pattern: when 600 kcal/day of sugar was added to the diet in beverages there was only a 56% compensation in the reduction of calories from other food sources, and over 10 weeks a gain of 3.5 pounds (Raben 2002).

2) Inclusion of 100% juices fosters good dietary habits and reduces/delays introduction of soda and sweetened beverages into children's diets.

In September 2002 the National Academy, Institute of Medicine, issued Dietary Reference Intakes for Energy, Carbohydrates, Fiber, Fat, Fatty Acids, Cholesterol, Protein and Amino Acids. Although an Upper Limit (UL) was not set for total or added sugars, a maximal intake level of 25% or less of energy from added sugars is suggested based on the decreased intake of some micronutrients of American subpopulations when they are exceeding this level. Children consume 20-30 fluid ounces of water every day, the majority coming from beverages, the minority from the water content of foods and the metabolic breakdown of foods. If the allotment of 100% juice is reduced, it is likely that sweetened carbonated and non-carbonated beverages will be offered by parents or guardians as substitute beverages.

Approximately 50% of preschool children consume such drinks. These contain sucrose and high fructose corn syrup as added sugars, and do not contain the nutrients provided by fruit and vegetable juices, such as vitamin C or potassium. The DRI on energy and carbohydrates states in Chapter 11 that populations with a high intake of added sugar had low intakes of all nutrients, but especially vitamin A, Vitamin C, vitamin B12, Folate, Calcium, Phosphorus, Magnesium and Iron. Many of these nutrients are identified as being at risk for deficiency in the WIC populations. While replacing juices with fruits and vegetables in the WIC Food Packages would in theory be neutral for nutrients, in reality the convenience and appeal of 100% juices results in a much higher compliance among young children than seen for the foods, and will result in a more consistent displacement of sweetened beverages. Of note, the availability of 100% juices does not appear to displace milk from the diet, so dairy calcium and protein are not at risk.

3) Fruit/vegetable juices are very important sources of flavonoids.

In 2003 the USDA established a database for the flavonoid content of selected foods, and intends in the future to establish estimates for the average and range of flavonoid intakes, and perhaps to recommend a Dietary Reference Intake (DRI) for flavonoids. While the database [www.nal.usda.gov/fnic/foodcomp] includes data for hundreds of fruits, vegetables, legumes, grains and beverages, the reality is that for infants and young children, a major source of intake will be fruit and vegetable juices. For example, young children are less likely than adults to

consume significant amounts of onions or drink significant amounts of tea or wine. Thus, 100% fruit/vegetable juices are a critical source of these compounds, are available year-round at a reasonable price, and should not be reduced or eliminated in the revision of the WIC Food Packages.

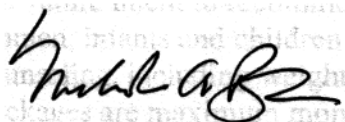
- 4) **The convenience of juice consumption draws women, infants and children into the WIC program, where they receive health screening and counseling, including weight management counseling.**

Juice is clearly one of the most popular components of the WIC food package, acting as an incentive to enroll women who are pregnant, breastfeeding, post-partum, or who are caring for infants or young children. Once in the WIC program, constant screening for health risk conditions, counseling, measurements of developmental growth. Reducing or eliminating juices from the Food Packages could reduce the number of applicants to WIC, resulting in less than adequate health care. The WIC programs include providing dietary advice to parents if their young children are showing signs of becoming significantly overweight or obese.

- 5) **As the current WIC Food Packages are maximum monthly allowances and serve as guidelines to the individual states, the states already have the discretion to modify the packages to meet cultural and nutritional needs of WIC participants, including ethnically diverse subpopulations that make up an increasingly large percentage of WIC participants.**

In conclusion Welch Foods Inc. welcomes an opportunity to address the review committee or answer any questions. I may be reached at the telephone number above or via e-mail at napyle@yahoo.com with any questions you may have. Thank you for this opportunity to address the committee.

Sincerely,



Nicholas A. Pyle, Government Relations
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REFERENCES

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