



BUSH BROTHERS & COMPANY
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December 11, 2003

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

RE: Revisions to the WIC Food Packages

Dear Ms. Daniels:

I am writing on behalf of Bush Brothers and Company to comment on potential changes to the food packages offered through WIC. Our company has carefully reviewed the Advanced Notice of Proposed Rulemaking, and we believe that adding canned beans to the WIC food prescription is consistent with both the letter and intent of the WIC legislation.

Our recommendation is to add unseasoned canned beans (pinto beans, kidney beans, black beans, navy beans, garbanzo beans, etc.) to the WIC food packages. We are not advocating adding new types of beans to the WIC program. Rather, we are suggesting that a more convenient form of the beans currently offered be added to the program. Please note that our recommendation is consistent with the one made by the National WIC Association in its 1999 position paper.

The comments below are focused on Section IX of the notice published in the Federal Register. We will address each of the fundamental considerations of WIC and demonstrate why offering canned beans would be consistent with the considerations.

1. Nutritional Risk

Canned beans are high in protein and iron, two nutrients which have been a key focus of WIC since its inception. In addition, beans are an excellent source of both folate and fiber. While the stated role of beans in WIC is as a protein source, the positive impact of iron, folate and fiber on WIC participants should not be overlooked.

2. Fat, Sugar and Salt Content

Most canned beans contain no fat and no sugar. The sodium content of canned beans ranges from 250mg to 450mg, depending on the type of bean. This sodium level is low enough to qualify for the American Heart Association's Heart Check program. (AHA requires sodium at or below 480mg.)

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3. Cost

Canned beans are an extremely economical way to provide supplemental nutrition to WIC participants. On average, a can of beans costs only 69¢. This equates to a very low 20¢ per serving.

4. Practicality and Administrative Feasibility

Given that dry beans are included in the current WIC food prescription, it is clear the USDA recognizes the nutritional value of beans. Therefore, the most critical issue is not whether beans need to be part of the food packages. Rather, the issue is whether canned beans need to be added as an alternative way for participants to buy and consume beans. We believe that if USDA wants to adhere to the principle of practicality, canned beans must be added as an option.

Consider these facts:

- ◆ 59% of women now work outside the home
- ◆ It takes 2 to 3 hours to cook dry beans, while it takes only 2 to 3 minutes to prepare canned beans
- ◆ Only 26% of U.S. households buy dry beans, while 61% of households buy canned beans

These facts illustrate the reality of today's world: for a mother who arrives home from work at 5:30 and has two young children to feed, it is simply not practical to prepare and serve dry beans. If we want to make nutrient-rich beans practical for this mother, then we must offer her canned beans through WIC.

5. Food Package Flexibility and Meeting Participants' Special Needs

One of USDA's objectives in providing flexibility is to address the cultural eating patterns of WIC participants. This is particularly relevant for beans. Approximately 35% of WIC participants are of Hispanic origin, and beans are a staple in the diet of most Hispanics. (In fact, one-third of all beans eaten in the United States are eaten by Hispanics.) By including canned beans in the WIC food packages, we are enabling Hispanic consumers to have greater access to an extremely healthy food, a food that they enjoy eating, and a food that is an important part of their cultural heritage.

Please do not hesitate to contact me if you have any questions or if Bush Brothers can provide any further information that would be relevant to this process. I can be reached at (865) 558-5461 or sharrison@bushbros.com. We appreciate the opportunity to comment on this matter, and we look forward to reading the final recommendations of the USDA.

Sincerely,



Steve Harrison
Vice President, Regulatory/Government Affairs