

Campbell SOUP Company

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December 15, 2003

Patricia Daniels
Director
Supplemental Food Programs Division
Food and Nutrition Service
USDA
3101 Park Center Drive
Room 520
Alexandria, VA 23302

Re: Public Notice 7 CFR Part 246, Revisions to the WIC Food Package

Dear Ms. Daniels:

Thank you for the opportunity to provide comments and recommend changes to the WIC food prescription package. Campbell Soup Company is pleased to have the occasion to supply USDA with its recommendations and comments on the WIC food package.

Campbell Soup Company is a global manufacturer and marketer of high quality soup, sauces, beverage, biscuits, confectionery and prepared food products. The company owns a portfolio of more than 20 market-leading businesses worldwide each with more than \$100 million in sales. They include "Campbell's" soups, "Pepperidge Farm" cookies and crackers, "V8" and "V8 Splash" juices, "Pace" Mexican sauces, "Prego" pasta sauces, "Franco-American" pastas and gravies, "Swanson" broths, and "Godiva" chocolates. The company is ably supported by 24,000 employees worldwide.

Campbell Soup Company is proud of its long-time participation in the WIC program, providing V8® 100% vegetable juice and Campbell's® tomato juice to WIC clients for well over 10 years. Campbell Soup Company is a strong supporter of WIC because of its high public purpose and mission. We also recognize the Department's and the States' effective leadership. We commend the Department for solicitation of public comment on updating the WIC food package to reflect today's nutritional challenges, including convenience, consistent nutrient delivery, cultural practices, variety and balance, and new dietary recommendations. Changes in the program are overdue, and any updates should be based on the best available science.

BACKGROUND:

The Special Supplemental Nutrition Program for Women, Infants and Children (WIC) provides nutrition education and supplemental food to low-income pregnant, postpartum, and breast-feeding women; infants; and children up to age five. The supplemental foods provided are a key component of the WIC program and are the main incentive for

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participants to join the program. The WIC program and the food package were originally developed in the mid 1970's when hunger and nutrition deficiencies were the key public health concerns. More recently, public health concerns have extended to the need to reduce rates of overweight and obesity, especially among children. Obesity in both adults and children has been linked to type 2 diabetes, coronary heart disease, and stroke. Dietary management is an important component alongside exercise and other lifestyle factors to achieve healthy weight. Several public health initiatives are currently focused on fighting and preventing obesity.^{1,2} In addition, several studies have pointed out the inadequate intake of vegetables in Americans' diets, particularly of Americans of minority groups and lower-incomes.^{3,4} While WIC is recognized to be a cost-effective federal program, the fact that its food package is not in line with current dietary recommendations precludes it from meeting our most pressing public health and policy objectives. The current WIC food package remains essentially unchanged from the one developed in the seventies (minor changes were made in 1980), and this food package does not meet the dietary guidelines or current needs of many in the population.

RECOMMENDATIONS:

Campbell shares the concerns raised above related to the changing health needs of the WIC population and relevance of the current WIC food package. We recommend that the WIC food package be broadened to provide convenient, readily available, shelf stable and familiar vegetable choices to assist in building healthier eating practices and promote long-term health benefits.

JUSTIFICATION FOR CHANGE:

ADDITION OF VEGETABLES

Congress has requested that vegetables be added to the WIC food package. Vegetables offer many key nutrients for the WIC population, in addition to a wide variety of phytochemicals that may offer additional health benefits. Shelf-stable forms of vegetables are the most useful for the WIC population. They offer a widely available, consistent, high quality source of vegetable servings that can withstand long journeys home from the grocery store, and last the whole month of the WIC check.

NWA recognizes the need for vegetables, suggesting in their position paper that choices of vegetables, as well as fruits, are offered to the WIC population in fresh, frozen, or canned form.⁵ The Healthy People 2010 goal for vegetable consumption is to increase the proportion of people two and older who consume at least 3 servings daily of vegetables – with a target of 50%.¹ A recent study in AJPH found that girls age 11-18 had a mean intake of only 1.8 servings of vegetables a day (not including French fries).⁶ Only 14.1% of girls and 12.4% of boys in the lowest socioeconomic strata reported meeting the Healthy People 2010 goal.⁶

Currently, there are limited vegetable options provided to the WIC population through the current WIC food package. Only breastfeeding women receive raw carrots, and the

only other vegetable choice is vegetable juice in states where vegetable juice is approved.⁷

The National Cancer Institute's baseline study of fruit and vegetable intake among adults in the Maryland WIC program found that the mean intake of vegetables among WIC women was only 1.6 servings a day (not including French fries).⁸ An analysis of CSFII food pyramid serving data found that 22% of WIC-eligible children ages 2-4 consumed less than one serving of vegetables per day.⁹ Only 28% of these WIC-eligible children consumed the minimum recommended three serving of vegetables per day.⁹ This analysis is consistent with the published Pyramid Serving Data, showing that 20% of girls ages 2-5 consumed less than 1 serving of vegetables a day, and only 24% of girls ages 2-5 consumed the recommended three servings of vegetables.³ For women over the age of 20, 55% did not consume the recommended three servings of vegetables.³ Vegetable servings are needed within the WIC population, and the best way to address this need is to allow a variety of vegetable forms, taking into account seasonal and regional differences in availability and concerns about price consistency.

OVERWEIGHT AND OBESITY

Another concern within the WIC community is the issue of overweight and obesity. Overweight children and adolescents are at greater risk of becoming overweight and obese adults. Overweight and obesity are associated with greater risks of several chronic diseases, including several types of cancers, type 2 diabetes, and coronary heart disease.¹⁰ These chronic diseases account for 70% of all deaths in the U.S.¹¹ While overweight and obesity are increasing among the population in general, overweight and obesity are believed to be more common among minority groups and those with lower incomes.¹⁰ Minorities currently make up 63.2% of the WIC population, and to be included in WIC, must have incomes at 185% or less of the poverty line.¹²

A recent review of anthropometric measurements from 1998 found that approximately 13% of WIC children are overweight, an increase of 20% since 1992.¹³ Those overweight children were also found to be at greater risk for inadequate or inappropriate nutrient intakes and lower iron blood measures than the other WIC children.¹³ Another report found that 2/3 of a cohort of WIC women could be classified as overweight or obese, and that the rate of obesity within this cohort was twice that of the general US population.¹⁴ One way to address obesity is to consume moderate calorie and low-fat foods.

ADDITION OF A VARIETY OF SHELF-STABLE FOODS, AND CULTURALLY APPROPRIATE FOODS

At the present time the WIC food package offers few prepared foods to the WIC community. Addition of prepared foods that provide several nutrients will allow WIC participants to consume the nutrition they need while eating convenient and easy to prepare foods. Processed foods do not have seasonal constraints, nor are they subject to pricing variability due to seasonality.

By allowing processed forms of vegetables in the WIC program, participants are offered a shelf-stable form of vegetables. In processed foods, vitamin C and other labeled nutrients must comply with labeling laws. Unlike fresh produce, which may spoil when not used within a short period of time, processed foods are available for longer periods of time and reduce waste. Processed foods also eliminate the need for preparing the vegetables, often a hurdle for consumers to use produce; and processed foods are widely available, while some communities have limited access to fresh produce. In fact, a focus group based study found that those children in the lower socioeconomic groups reported using more frozen and canned fruits and vegetables.⁴

The current WIC food package does not allow flexibility to provide cultural food options. Therefore some of the WIC package could be wasted within certain communities because those foods are not commonly eaten or part of the culture.^{15,16} By adding different food options that fit within the wide breath of cultures served by WIC, the WIC food package will provide greater nutritional value to the clients it serves.

PROPOSAL:

Campbell offers four ways to add vegetable servings to the WIC population's food packages and to increase moderate calorie offerings consistent with a healthy diet. These suggestions not only provide vegetable servings, but also provide shelf-stable, culturally appropriate, high quality food options:

- Separate 100% Vegetable Juice from Fruit Juice in the WIC Food Package.
- Add Vegetable Soup to the WIC Food Package.
- Add Processed Beans to the WIC Food Package.
- Add Processed Pasta in Sauce (tomato or meat-based) to the WIC Food Package.

Proposal One: Separate 100% Vegetable Juice from Fruit Juice in the WIC Food Prescription Package. We agree that juice is an important food to deliver fruit and vegetable servings, as well as vitamin C, to the WIC population. We believe the juice category should be maintained at its current level in the WIC food package. However, we recommend that half of the juice offered should be specified as vegetable juice.

Justification: Vegetable juices contain 50% of the calories of fruit juice and have significantly fewer grams of sugar per serving. The Food Guide Pyramid recommends more servings of vegetables than fruit for both children and women (three vegetables to two fruit for children and four vegetables to three fruit for women).¹⁷ Tailoring the food package to allocate half of the juice category to vegetable juice would help WIC participants obtain the recommended goal for vegetable servings per day. For example, using Food Package V for pregnant and breastfeeding women, this change would supply 23 6-oz servings of vegetable juice per month, allowing almost one vegetable serving daily.⁷

Recommendations by the NWA suggest additions to the WIC food package of products that are versatile and culturally accepted. Vegetable juices fit many different cultural groups and allow for more flexibility within the program. Vegetable juice is especially popular within the Hispanic population, which currently makes up 38.1% of the WIC population.^{18,12}

Campbell's vegetable juices provide consistent product with a high level of food quality and safety. No matter the season, vegetable juices are widely available and are a convenient, multi-serve form of vegetable servings with guaranteed nutrient levels. Vegetable juices are extensively distributed in all types of retail outlets and are convenient for WIC participants to purchase and use. The 46-ounce containers of vegetable juice cost between \$1.33 - \$2.02 on average for Campbell's® tomato juice, and between \$2.05 and \$2.79 for V8® 100% vegetable juice.

Proposal Two: Add Vegetable Soup to the WIC Food Package. Soup would make an excellent addition to the WIC food package as a side dish or light meal, as it is a familiar, versatile product, appetizing to all age groups, and is a good source of nutrition. The suggested criteria for this category are <200 kcal, must contain at least one positive nutrient at 10%DV, must supply a serving of vegetables per 8-ounce serving, and must provide <30% calories from fat and <20 mg of cholesterol.

Justification: Soup is a good source of many nutrients needed by the target audience. Canned soups contain nutrients such as vitamin A, vitamin C, fiber, and iron. Soup is widely available, shelf-stable, and is accepted by many different cultures. Canned condensed soup is in the majority of American homes. Soup is an excellent transition food for children and provides familiar tastes.

As stated above, vegetable consumption is an important issue within the WIC community, and canned vegetable soups provide another alternative for WIC clients to consume vegetables. Thirteen Campbell's® condensed soups and two Campbell's® Healthy Request® condensed soups contain a full serving of vegetables per eight-ounce serving. While not everyone enjoys eating vegetables, or knows how to cook vegetables, canned vegetable soups provide convenient and delicious snacks or light meals.

Campbell's condensed vegetable soups provide filling foods at moderate calorie levels, with most being low fat and low in cholesterol, and all containing a good source of at least one key nutrient. Soup generally provides fewer calories per unit volume – providing greater food weight for fewer calories. Lower energy density foods can help the WIC population control calories and manage their weight. Since many soup varieties are low in fat, they can help maintain a lower fat diet. Additionally, each can provides two servings, providing easy portion control for WIC clients.

Canned condensed soups offer a large number and variety of flavors and types – serving many different cultural needs. Many cultural groups also cook with soup, using soup to incorporate nutritious foods into a variety of meals.¹⁸ Canned condensed vegetable soups provide more than just vegetables; many also provide grains or protein. These

soups also provide the delicious taste that appeals to children, providing a food source that they will actually eat. Soups are exciting and delicious alternatives to canned vegetables for children.

Canned soups are available throughout the year and have very wide distribution in the US. Prices of Campbell's condensed soup range from approximately \$0.73-\$1.11, or \$0.60-\$1.10 on promotion. These products are available in all types of retail outlets and are convenient for WIC participants to purchase. Campbell's soups are a trusted brand that provides high quality, flavorful soups.

Proposal Three: Add Processed Beans to the WIC Food Package. Processed beans should be added to the WIC Food Package in addition to dried beans.

Justification: Dried beans, while very nutritious, can be inconvenient and time consuming to prepare, and have limited appeal to WIC participants. Canned beans offer the same nutrition as dried beans, but allow for easier preparation and are immediately ready to eat. Canned beans are packaged in a more usable size for many participants, thereby leading to less waste. Beans are an excellent source of fiber, a good source of iron and protein, and are low in fat and saturated fat. WIC participants need more fiber, currently consuming much lower amounts of fiber than recommended. A review of the diets of WIC participants, found that pregnant and breastfeeding women on WIC consumed only 11.5g and 12.1g of fiber, respectively.¹⁹ Campbell's canned bean products also provide a serving of vegetables in every 8-ounce serving. Campbell's Pork and Beans has an average retail price of \$0.93 in the 16-ounce container.

Many canned beans are available in ready-to-eat form. Beyond simple canned beans, there are several different varieties of canned beans in sauce, such as canned pork & beans, and vegetarian beans. Canned beans are part of many different cultures' diets including the Hispanic, African American, Native American, Middle Eastern, and Alaskan cultures.¹⁶ By allowing canned beans in the WIC program, as suggested by NWA, WIC participants will be more likely to consume these nutritious foods.

Proposal Four: Add Processed Pasta in Sauce (tomato or meat-based) to the WIC Food Package. Canned pasta products would add a nutritious and convenient entree or snack for WIC participants. These products should contain a minimum of a good source of six nutrients and provide at least 150 calories.

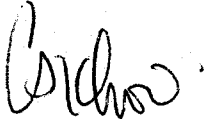
Justification: Canned pasta products provide a good light meal, affording both a serving of vegetables as well as a serving of grains in every 8-ounce serving. SpaghettiOs® pasta products are not only convenient; they are also a safely shaped pasta product, enjoyable by children ages one year and older. These products are a good source of several nutrients that are important for the WIC population, namely vitamin A, iron, thiamin, riboflavin, niacin, and folic acid. Many of these products also provide a good source of fiber, vitamin C, vitamin D, and calcium.

Processed foods do not have seasonal constraints, or pricing variability due to seasonality. Canned pasta products are available throughout the year and have very wide distribution in the US. Prices for Campbell's canned pasta products range from approximately \$0.85-\$1.36, or \$0.55-\$1.01 on promotion. These products are available in all types of retail outlets and are convenient for WIC participants to purchase.

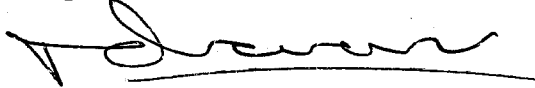
SUMMARY:

The WIC food package needs changes to meet the current needs of the WIC population. Adding foods that provide vegetable servings will help bring the food package in line with current dietary recommendations.

Sincerely,



Chor San Heng Khoo, Ph.D.
Vice President, Global Nutrition and Health
Campbell Soup Company



David Macnair, Ph.D.
Senior Vice President, Global Research and Development/Quality Assurance
Campbell Soup Company

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