



# The Hartford Food System

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December 11, 2003

Patricia Daniels  
USDA, Director, WIC  
3101 Park Center Drive, Room 520  
Alexandria, Virginia 22302

Dear Ms. Daniels,

On behalf of the Hartford Food System, I would like to thank you for this opportunity to provide comments on "Revisions to the WIC Food Packages." The WIC food packages have been key in WIC's success in improving the health and nutrition of the women, infants, and children enrolled in the program. This success is partly due to the packages' nutritional, incentive, and food security value, and these factors must be considered during their revision.

Accordingly, we offer the following recommendations:

## **1. WIC Food Package Foods: Building Blocks for Good Nutrition and Health**

Add Fruits and Vegetables to Current WIC Foods: fruits and vegetables, and more high calcium food choices such as yogurt and soymilk. However adding new food categories should be offset by food package reductions in order to comply with USDA's request for cost neutral comments. Since the current foods help comprise a nutrient-rich diet, their reduction is not sensible; the best way to add a produce category is to secure additional Congressional appropriations to cover the additional costs.

Retain Current WIC Foods. Each type of food (iron-fortified infant formula, infant cereal, milk, iron-fortified breakfast cereal, cheese, Vitamin C-rich fruit and vegetable juices, beans, peanut butter, eggs, and, for breastfeeding women, carrots and tuna fish) makes an important contribution to the nutritional content of the package. These foods are acceptable, practical, accessible, and cost-efficient.

Foods Not to Add: low-cost starches such as bread, rice, and pasta would not improve the WIC food packages. These low-cost foods are purchased and consumed regardless of WIC availability, and their inclusion would not have a positive impact on the health and nutrition of WIC clients.

## **2. Strong Federal WIC Food Package Standards Protect Benefits**

Preserve Emphasis on Key Nutrients in WIC Food Packages. The contents of the packages serve to *supplement* clients' diets. The key nutrients iron, calcium, Vitamins A and C, and protein should be retained. The B vitamin folate should be added as a nutrient key to preventing birth defects. Other nutrients should be considered based on findings of the Food and Nutrition Board WIC review.

Protect Nutritional Integrity of Food Package by Retaining Strong Nutritional Standards. Revisions should protect the nutritional integrity of food packages by maintaining the current stringent nutrition standards for WIC foods, including high requirements for iron in cereals and Vitamin C in fruit and vegetable juices, limits on sugar and fat, and the prohibition of high sugar cereals and sweetened juice or milk.

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Retain Current Targeting of WIC Food Package Benefits. We oppose reducing the size of the package for young children by shifting resources toward other food packages. This would only diminish WIC's positive impact on nutritionally at-risk children's health and nutritional status, at one of their most crucial periods of physical and cognitive growth and development, repercussions of which could last a lifetime. Less WIC food will also result in more non-WIC food, which often includes sugar- and starch-laden, processed foods.

WIC Food Package Importance: the WIC Food Package is not only a source of nutritional support but also an incentive for clients to visit the clinic and thus be engaged in nutrition education and health care referrals. If parents decide not to enroll their children in WIC because the food package is too small to be worth the effort, then these children are not benefiting.

### **3. WIC Food Package Evaluation Should Be Comprehensive**

Since the food packages' last review, there has been much research on nutrition and health. This planned review should include an evaluation of the current health and nutritional needs, dietary habits, and food preferences of the WIC population in order to apply this research to the WIC food packages. This understanding is necessary in making revisions to maximize the nutritional, food security, and incentive value of the packages, and consequently WIC's ability to continue to empower WIC families to make the best health choices.

Thank you again for the opportunity to share our views.

Sincerely,

Jiff Martin,  
Food Policy Director

Laurie Rago  
Food Policy Intern