

December 15, 2003

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

Dear Ms. Daniels:

Re: FR Doc. 03-23498 - Revisions to the WIC Food Packages.

Thank you for the opportunity to comment on the Federal Register Notice regarding revision of the WIC food packages. We commend USDA for undertaking a comprehensive review of the supplemental food packages in view of the many changes in the WIC population, dietary intake trends, and advances in nutrition science since the last revision in 1980.

The USA Rice Federation is a national trade association representing all segments of the U.S rice industry. Through a wide variety of consumer research and education programs, we have gained keen insight and understanding of consumer preferences on issues regarding dietary choices, as well as food preparation and consumption. Our experience and knowledge, together with research from other expert sources, guides our response on these proposed revisions.

Our responses to the specific questions posed in the notice appear below. To summarize, these comments support our recommendation that there are many benefits to adding rice to the WIC food packages for infants, children and women.

Benefits of Rice Specific to WIC population:

Infants – fortified rice cereal can be imperative for infants four to seven months old for two primary reasons. First, ***rice is the least allergenic of all grains***. Second, babies require ***additional iron*** at this stage in life as iron stores are depleted. ***One-half cup of prepared enriched rice cereal supplies 90% of infant's daily iron requirements.***

Children up to Age 5 – as for infants, all rice is hypoallergenic and enriched rice contains added iron, niacin and thiamin. With ***childhood obesity*** on the rise, rice is an ***excellent source of energy, providing complex carbohydrates with only a trace of fat.*** Rice contains no cholesterol and is naturally low in sodium.

Pregnant Women and Women of Child-Bearing Age – enriched rice is a good source of folic acid, which greatly reduces the risk of neural tube birth defects. Enriched rice contains added ***iron to prevent anemia, as well as niacin, and thiamin,*** which play important roles in energy metabolism and nerve transmission.

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In response to questions posed:

1. *Please indicate what elements of the WIC food packages you would keep the same and why.*

The basic goal of the WIC food packages is sound. The specified foods are nutrient- dense, economical, and administratively manageable for WIC state agencies, readily available in retail stores, offer variety, versatility and broad appeal, and generally can be apportioned into daily servings.

2. *What changes, if any, are needed to the types of foods currently authorized in the WIC food packages? If you recommend additions or deletions to the types of foods currently offered, please discuss recommended quantities and cost implications.*

The addition of rice to the WIC program would be beneficial for many reasons:

The Food Guide Pyramid recommends 6-11 daily servings of grains, including rice. However USDA data shows that fewer than 50% of the population are consuming the recommended minimum servings, and are getting far too many calories from the calorie-rich, nutrient-poor tip of the Food Guide Pyramid. According to the USDA's Nutrition Insights #25, published in September 2001, only 57 percent of children ages 2-3 and 31 percent of children ages 4-6 are meeting the dietary recommendations for grains.

Rice brings a high nutritional value to feeding programs. It is an excellent source of complex carbohydrates and, most notably, has the highest quality protein of all grains. In addition to its protein quality, rice is hypoallergenic, easy to digest, and restorative. Rice contains no cholesterol and is naturally low in sodium and fat.

Rice is a well-known and highly acceptable food, in all religions and cultures, and is therefore more likely to be eaten. Rice is especially popular in the present-day ethnic and cultural mix of the WIC population. It is easy to prepare and can be incorporated into familiar meals. Rice is versatile and can be consumed for lunch, breakfast or dinner, and in everything from soups to salads, entrees, side dishes, and even desserts. Rice is easy to store, convenient to have on hand, and low cost. Many at-risk populations may not have good appetites, thus offering a familiar food would be useful.

Additionally, greater emphasis should be placed on whole grain foods, such as brown rice, for increased fiber, and low-fat or fat-free foods, such as enriched rice, to serve as a carbohydrate balance for proteins and unsaturated fats.

Serving size recommendations should be consistent with the new Dietary Guidelines and Food Guide Pyramid. However we would like to point out that current recommended serving sizes for rice vary from ½ cup cooked in the Food

Guide Pyramidⁱ to ¾ cup on Nutrition Facts labels, while current consumer perception of serving size is 1 cup cookedⁱⁱ, according to the USDA.

At an approximate cost of 10 cents per cooked cup, rice is an exceptional value and one of the most economical foods, making it a very practical choice for the WIC Program.

3. *Should the quantities of foods in the current WIC food packages be adjusted? If yes, by how much and why? Please discuss cost implications.*

The quantities of foods listed presently in the WIC food packages are quite moderate, and no recommendation for change is made.

4. *Recognizing that the WIC program is designed to provide supplemental foods that contain nutrients known to be lacking in the diets of the target population, what nutrients should be established as priority nutrients for each category of WIC participant? Please provide the scientific rationale for them.*

Infants – Nutritionists agree infants require additional iron at this stage in life, as iron stores are depleted. One-half cup of prepared enriched rice cereal supplies 90% of infant's daily requirements for iron. This will prevent anemia as iron requirements increase. Additionally, **rice is considered to be the least allergenic of all grainsⁱⁱⁱ, therefore parents feeding infants rice will have no need to worry about allergic reactions.** Later other grains such as oatmeal and barley can be introduced one at a time to determine how the baby tolerates each new food.^{iv} Fortified rice cereal is also a good source of zinc and calcium.^v

Children Up To Age 5 – With childhood obesity on the rise, it is important WIC offer foods that provide carbohydrates – the best energy source for active children – yet are low in fat and cholesterol. In addition to providing a wholesome source of energy, rice has only a trace of fat, no cholesterol and no sodium. This along with being hypoallergenic and gluten-free, makes rice well-suited for children with special dietary needs. Additionally, enriched rice provides a good source of **iron, niacin and thiamin.**

Pregnant Women and Women of Child Bearing Age – Folic acid offers a most significant advance in preventing neural tube birth defects. Not only is enriched rice is a good source of folic acid, it also contains **added iron that can reduce the risk of anemia, as well as added niacin and thiamin, known to have roles in energy metabolism and nerve transmission.^{vi}** One cup of cooked brown rice contains 3.5 grams of total fiber.^{vii} **This can be a valuable addition to a diet in which 25 grams of total fiber is recommended for adult women, and 28-29 grams of total fiber is recommended in pregnancy and lactation.^{viii}**

5. *Keeping in mind that foods provided by WIC are designed to be supplemental, can the WIC food packages be revised (beyond what is allowed under regulations) to have a positive effect on addressing overweight concerns? If so, how? Please be specific.*

In response to obesity concerns, we would want to encourage WIC participants to follow the science-based principles of good nutrition as stated in the Food Guide Pyramid and Dietary Guidelines. For the recommended 6-11 daily servings of grains, rice is an excellent source of energy, providing complex carbohydrates, yet only a trace of fat, for those who are overweight or obese. Additionally, brown rice provides a good source of fiber. Brown University's National Weight Control Registry reports that on average, successful individuals reported eating healthful diets of 56% carbohydrate, 24% fat and 19% protein.^{ix}

6. *Are there other concerns that affect foods issued through the WIC food packages that should be considered in designing the food packages? For example should WIC provide options to address allergies, cultural patterns or food preferences?*

Revisions to the WIC packages should take Celiac Disease into consideration, since it was not well identified or understood in 1980. Rice is considered to be the least likely grain to cause an allergic response, yet it is not part of any WIC package. Conversely, an allergy to the protein (gluten) found in wheat, rye, barley and possibly oats, known as Celiac Disease, is now believed to affect 1 in 250 Americans^x. This disease causes chronic and potentially life-threatening damage to the small intestine, and several wheat and oat products are included on the WIC packages. Several other foods in the WIC program are common allergens as well, such as milk, peanut butter and eggs^{xi}.

Historically rice has always been an important food. Today, this unique grain helps sustain two thirds of the world's population. People of all cultures are familiar with buying, preparing and serving rice. For all these reasons, rice fits well with the changing WIC population.

7. *What data and/or information (please cite sources) should the Department consider in making decisions regarding revisions to the WIC food packages, e.g., nutritional needs of the population, ethnic food consumption data, scientific studies, acculturation practices, and participant surveys, etc.*

Today, two thirds of U. S. consumers are eating rice once a week, 85 per cent have rice at least twice a month, and 90 percent are eating rice in restaurants, up from 75 percent in 1992. Clearly rice is a mainstay in the U. S. Its familiarity, taste, versatility, nutritional value, convenience and low cost make rice a popular choice with consumers of different cultural backgrounds.

8. *Recognizing that current legislation requires WIC food packages to be prescriptive, should participants be allowed greater flexibility in choosing among authorized food items? If so, how?*

The first tenet of nutrition is that a food must be accepted and eaten in order to be beneficial; therefore WIC should allow greater flexibility in choosing among authorized items. Not only is rice a vital food aid component for its nutritional value,

but its wide acceptance virtually guarantees that its use in the WIC program will be successful.

9. *How can WIC food packages best be designed to effectively meet nutritional needs in culturally and ethnically diverse communities?*

Culturally appropriate recipes and meal plans could be included for various communities. These suggestions could incorporate several of the included foods to help consumers utilize the WIC package efficiently.

10. *Should WIC State agencies be afforded more or less flexibility in designing the WIC food packages? Please explain.*


WIC State agencies should be given more flexibility if the staff is properly qualified. Alternatively, services of a qualified nutritionist or healthcare professional could be retained to design WIC packages.

11. *WIC food selection criteria comments.*

We commend USDA for updating WIC food packages to better relate to current health issues of the target population -- obesity and the rise of diabetes, heart disease and cancer. The WIC program serves as a key intervention point, particularly for children, to establish better nutrition. USDA's consumption data shows that Americans are overfed and undernourished, with too many selecting most of their foods from the nutrient-poor, calorie-rich tip of the Food Guide Pyramid. We urge a greater concentration on providing foods that meet the recommendations of the Food Guide Pyramid. This will help both accomplish the WIC mission of supplementing key nutrients while contributing to weight management.

Thank you for your consideration of the U.S. rice industry's views and comments.

Sincerely,


Stuart Proctor
President and CEO
USA Rice Federation

ⁱ <http://www.babybag.com/articles/fdapyrmd.htm>

ⁱⁱ Riviana Foods, Houston, Texas

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- iii Jones, Marjorie H.: The Allergy Self-Help Cookbook, Page 9. Rodale Press, 2001.
- iv Kansas State University Agricultural Experiment Station and Cooperative Extension Service. Feeding Our Youngest: 4 Month Old. July 2003.
- v <http://www.gerber.com>
- vi Mahan, L. Kathleen, et al: Krause's Food, Nutrition and Diet Therapy, 10th Edition. Pub: W. B. Saunders Company, 2000, pp. 175-176.
- vii Pennington, Jean, Editor: Bowes and Church's, Food Values of Portions Commonly Used, 17th Edition, 1998.
- viii Institute of Medicine of the National Academies, Dietary Reference Intakes: Energy, CHO, Fiber, Fat, Fatty Acids, Cholesterol, Protein, and Amino Acids, pp. 7/38-39. Pre-publication Copy, 2003.
- ix "Study proves that known strategies for weight loss work." Press release, American Diabetes Association, June 25, 2001. lifeclinic.com – Nutrition Related Articles:
- x <http://www.celiac.org/about.htm>
- xi Willingham, Theresa: Food Allergy Field Guide, pp. 43-84. Pub. Savory Plate, Inc., 2000.