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

Comments on RIN 0584-AD39 Special Supplemental Nutrition Program for Women, Infants and Children (WIC): Revisions to the WIC Food Packages

The American Soybean Association (ASA) appreciates the opportunity to provide the following comments in response to the advanced notice of public rulemaking (ANPR) on revising the WIC food package under Docket # **RIN 0584-AD39**.

The American Soybean Association is a membership-driven, grassroots policy organization representing nearly 30,000 U.S. soybean producers.

To respond to several of the questions posed in the ANPR, ASA would like to offer the following comments:

I. Which elements of the WIC food package should be kept the same?

The WIC food package has a long history of providing a nutritional boost to the diets of pregnant and lactating women and their children until they reach age five. The foods currently included in the current package provide essential nutrients including protein, calcium, iron, vitamin A, and vitamin C. These nutrients are often deficient in the WIC-eligible population and should remain in the package. In addition, WIC package foods are generally acceptable, practical, accessible and cost-efficient. Through their inclusion in the WIC package, whole soybeans and soy-based infant formulas have long contributed to the health and well-being of the women and children who participate in the program.

Soy-based infant formulas play a major role in the nutrition of approximately 25 percent of formula-fed infants in the United States and should continue to be a significant contributor to the WIC food package. Commercially available soy-based infant formulas have been shown to support optimal growth and development in normal, term infants and to provide the required amounts of all essential vitamins, minerals and electrolytes specified by the American Academy of Pediatrics

II. What changes, if any, are needed to the types of foods currently authorized in the WIC food packages?

Washington Office

600 Pennsylvania Avenue, SE, Suite 320, Washington, DC 20003

PHONE: 202/969-7040, FAX: 202/969-7036

<http://www.oilseeds.org>



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The U.S. has experienced dramatic population and demographic shifts as well as changing attitudes toward consumption of soyfoods. Providing an array of alternative foods in each core food package will help further promote consumption of critical nutrients for WIC participants.

The 2000 DHHS and USDA Dietary Guidelines for Americans and the *USDA Food Guide Pyramid for Young Children* both highlight soyfoods as appropriate sources of protein and calcium in a balanced diet. Soy is a nutritionally complete protein that has an unusually well-rounded amino acid profile. About 35 to 38 percent of the calories in soybeans are derived from protein, compared to 20 to 30 percent in most other beans. Soy can be added to products to boost protein content without adding fat, saturated fat or cholesterol.

As USDA and the Institute of Medicine panel consider altering the content of WIC food packages, we ask that you consider that soymilk, tofu, soy nut butter, soy cheese, cold cereals with soy and the many products containing high-quality soy protein, are affordable, easy sources of protein and calcium as well as other vitamins and minerals.

In response to consumer demand, there has been a significant growth in the number of soy-based food products available to U.S. consumers. According to United Soybean Board's 2003-2004 Consumer Attitudes on Nutrition report, regular usage of soymilk alone increased from 14% to 17% in 2003. Tofu sales have more than doubled in the last decade. Additionally, cold cereals with soy, soy nut butters and soy cheeses enjoy increased prominence in mainstream supermarkets.

VI. Are there other concerns that affect foods issued through the WIC food packages that should be considered in designing the food packages?

Considering that some minority groups have dietary restrictions or preferences, including Asian Americans, Latin Americans, Indians and African Americans, it may be desirable to offer recipients additional options for satisfying protein, calcium and other needs. Soymilk, regular tofu and tempeh contain seven, nine and 16 grams of protein per serving (although values vary considerably among brands). Additionally, many soyfoods are good sources of calcium. One half cup of cooked soybeans provides 88 mg of calcium and calcium-fortified soymilks contain between 200 and 300 mg of calcium per serving. To ensure the WIC program continues to benefit the public's health, foods in the WIC package must evolve to reflect new consumer tastes, preferences and current nutrition knowledge about health promoting foods.

On behalf of the U.S. soybean producers, the American Soybean Association appreciates the opportunity to provide comment to this important initiative.

Sincerely,



Ron Heck
President
American Soybean Association