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December 12, 2003

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

Reference: REVISIONS TO THE WIC FOOD PACKAGES

Dear Ms. Daniels:

The National Dry Bean Council (NDBC) is writing to comment on potential changes to food packages offered through the WIC program.

Like members of our sister organization, the American Dry Bean Board, NDBC members represent all segments of the U.S. dry bean industry, including producers, shippers, and packagers. NDBC members are located in 13 states and at least 40 Congressional districts.

NDBC supports making dry beans available in the WIC program in both dry pack and canned packaging formats. It does not favor excluding any particular packaging format.

In this context, NDBC supports the comments made by one of our members, Bush Brothers and Company, in a separate letter to you dated December 11, 2003, as follows:

"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.

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1. Nutritional Risk

Canned beans are high in protein and iron, two nutrients that 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 250 mg - 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.)

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 cost of 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 prescription. 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 only 2 to 3 minutes to prepare canned beans
- ◆ 61% of households buy canned beans

With all the time demands of working, taking care of children, cooking, etc., canned beans offer a quick cooking, nutrient-rich choice for WIC participants.

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 package, 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.

