



Oregon

Theodore R. Kulongoski, Governor

PI-33

Department of Human Services

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December 15, 2003

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

Re: Revisions to the WIC Food Packages

Dear Ms. Daniels,

The Oregon 5-to 9-A-Day Group respectfully offers the following comments to the advanced notice of proposed rulemaking regarding revisions to the WIC food packages.

The members of the Oregon 5-to 9-A-Day Group, recommend the following:

Recommendation: Allow the substitution of fresh, frozen, dried or canned (without sugar) vegetables and/or fruits for some or all of the juice currently offered in the WIC food packages. Vegetables and fruits could be substituted at one pound fresh, canned or frozen for every quart of prepared juice allowed. States should be allowed to determine appropriate substitutions, which address cultural needs and seasonal and regional availability of these products.

Rationale: This substitution is critical for support of current nutritional science related to the importance of the daily consumption of vegetables and fruits. Research shows that many low-income families do not purchase vegetables and/or fruits in adequate quantities to meet nutritional needs due to the high cost relative to other high fat, high sugar, prepared foods. This substitution would assist in increasing WIC participants' consumption of fiber, antioxidants, vitamins A and C, and many micronutrients. An increased consumption of vegetables and fruits is known to reduce the incidence of cancer, high blood

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pressure, diabetes and obesity. Additionally, a reduction in consumption of juice would reduce overall caloric intake and incidence of tooth decay, particularly in WIC children. Substituting vegetables and fruits could also bring the provision of juice through WIC down to the Food Pyramid Guidelines of 4 cans/month, rather than the 6 cans/month currently allowed. Providing vegetables and fruits on WIC food packages would allow participants to apply the knowledge gained from the nutritional counseling they receive in WIC.

Recommendation: Allow any vegetable or fruit high in vitamin A to be substituted for the carrots currently provided in the breastfeeding package. An example of an appropriate substitution would be apricots.

Rationale: Making alternatives available increases the likelihood that this nutrient will be consumed by participants.

The Oregon 5-to-9-A-Day Group wishes to express the critical importance of including a variety of vegetables and fruits among those foods authorized for use by the WIC Program. Vegetables and fruits are generally high in fiber and contain wide varieties of nutrients. They are often not attainable by low-income families, based on cost-per-pound compared to many high sugar, high fat, packaged foods. Additionally, many families are unfamiliar with the benefits and palatability of vegetables and fruits. Adding a variety of them to the WIC food packages would allow WIC participants to try these foods, at no cost to them, thereby helping to establish life-long eating patterns that include these critical foods. We appreciate the opportunity to comment.

Sincerely,



Joan Ottinger, R.D., Chair
Oregon 5-to-9-A-Day Group