



SUSTAINABLE AGRICULTURE COALITION

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November 6, 2006

Patricia N. Daniels, Director
Supplemental Food Programs Division,
Food and Nutrition Services, USDA,
3101 Parke Center Drive, Room 528,
Alexandria, VA 22302.

Comments submitted regular mail and via e-mail to WICHQ-SFPD@fns.usda.gov.

RE: Special Supplemental Nutrition Program for Women, Infants and Children
(WIC): Revisions in the WIC Food Packages; Proposed Rule, published in the Federal
Register on August 7, 2006 [Docket No. 0584-AD77]

Dear Director Daniels,

On behalf of the Sustainable Agriculture Coalition and its partners, I appreciate this opportunity to submit comments on the proposed revisions to the food packages offered by the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC.) The Coalition's member organizations include the Agriculture and Land Based Training Association, American Natural Heritage Foundation, C.A.S.A. del Llano (Communities Assuring a Sustainable Agriculture), Center for Rural Affairs, Dakota Rural Action, Delta Land and Community, Inc., Future Harvest/CASA (Chesapeake Alliance for Sustainable Agriculture), Illinois Stewardship Alliance, Innovative Farmers of Ohio, Institute for Agriculture and Trade Policy, Iowa Environmental Council, Iowa Natural Heritage Foundation, Kansas Rural Center, Kerr Center for Sustainable Agriculture, Land Stewardship Project, Michael Fields Agricultural Institute, Michigan Integrated Food and Farming Systems, michigan Land Use Institute, Midwest Organic and Sustainable Education Service (MOSES), The Minnesota Project, National Catholic Rural Life Conference, National Center for Appropriate Technology, Northern Plains Sustainable Agriculture Society, Ohio Ecological Food and Farm Association, Organic Farming Research Foundation, Pennsylvania Association for Sustainable Agriculture, Sierra Club Agriculture Committee, and the Washington Sustainable Food and Farming Network.

The Sustainable Agriculture Coalition (SAC) represents grassroots farm, rural, and conservation organizations from across the country that together advocate for federal policies and programs supporting the long-term economic and environmental sustainability of agriculture, natural resources and rural communities. The national alliance of grassroots groups takes common positions on critical federal food and agricultural policy issues and provides financial support for collective representation before Congress and federal administrative agencies. SAC was established in 1988 and has been deeply involved in policy education, consensus building, and

policy option development since that time.

Currently serving an estimated 8 million clients, the WIC program has provided critical food and nutrition-related services to our nation's most vulnerable families through "food packages" designed to meet the specific nutritional needs of expectant mothers and children at different stages of development. We are pleased the WIC food package changes recently proposed by USDA would greatly improve the nutritional standards of the WIC program, aligning food packages more closely with current dietary guidelines for the consumption of fruits, vegetables, and whole grains.

Largely consistent with recommendations from the Institute of Medicine (IOM,) the proposed food package revisions will help ensure that WIC participants have access to fresh and wholesome food, and better enable families to adopt lifelong healthy eating habits. In addition, these proposed changes have the potential to encourage WIC client patronization of established local farmers markets and other direct marketing farmer-to-consumer ventures, while simultaneously offering flexibility to families with diverse cultural food preferences. In short, adoption of USDA's proposed WIC food package revisions will make vital improvements in the quality of nutrition services provided to WIC clients. We therefore enthusiastically support the general nature of the new WIC policies proposed by USDA, but also offer the following suggestions for strengthening and implementing the proposed revisions:

I. Implementing the Complete IOM Food Package Recommendations Will Optimize the Nutritional Benefits of the Revised WIC Food Packages

While the majority of the IOM's suggestions for updating the food packages are reflected in USDA's proposed revisions, several key components of the IOM-recommended food package allowances were reduced or eliminated. The most significant departure USDA makes from the IOM recommendations concerns the monthly dollar amount of the "cash value food instruments" (hereafter "vouchers") issued for the purchase of fruits and vegetables. While the IOM proposal would allow \$10 per month to women and \$8 per month to children fruits and vegetables, the USDA proposal decreases this amount to \$8 and \$6, respectively.

Although this decrease is part of USDA's effort to maintain cost neutrality in the WIC program as it institutes the food package revisions, the proposed fruit and vegetable voucher reduction could potentially eliminate 20 percent an important source of micronutrients for WIC clients. According to the IOM, pregnant, post-partum, and breast-feeding women are at significant risk for inadequate micronutrient consumption:

The micronutrients with the highest prevalence of inadequacy were magnesium and vitamin E. For vitamin E, the estimated prevalence of inadequacy exceeded 90 percent for pregnant and lactating women and was almost 100 percent for non-breastfeeding postpartum women. More than 40 percent of pregnant and lactating women had inadequate folate intakes. About one-third of pregnant and lactating women had inadequate intakes of vitamins A, C, and B6. An even higher percentage of non-breastfeeding postpartum women had inadequate intakes of

vitamins A and C (more than 40 percent). The prevalence of inadequate intake of vitamin B 6 was twice as high for pregnant and lactating women as for non-breastfeeding postpartum women.¹

In addition, the IOM reports that 40 percent of breast-fed infants age six through eleven months had inadequate iron uptakes, and 60 percent were receiving insufficient amounts of zinc.²

Based on these findings, we recommend that USDA adjust the proposed food package revisions to reflect the IOM's initial suggested monthly fruit and vegetable voucher amounts. The IOM crafted its proposal with the stated goal of making the WIC food packages consistent with current Dietary Reference Intakes (DRI's,) for adequate nutrient consumption. The fruits and vegetable voucher amounts recommended in the IOM report are part of a comprehensive set of dietary recommendations designed to afford nutritionally insecure women and children minimum levels of nutrient consumption consistent with the Dietary Guidelines for Americans. In the event USDA finds that budget restrictions prohibit adoption of the full range of IOM food package recommendations, we recommend that USDA to work closely with Congress within the appropriations process to secure the additional funding necessary to implement these recommendations.

II. Existing Farmers Market Networks Should Play a Crucial Role in Implementing the New WIC Food Packages

Currently, there are an estimated 4,000 farmers markets operating in rural and urban communities across the country, and the number continues to grow. These markets are increasingly functioning as the primary providers of fresh, affordable, and healthy foods in communities historically underserved by large-scale food retailers. In addition, many of these markets, in both urban and rural areas, are successfully meeting the demands of culturally diverse customers with unique food preferences.

The ability of these markets to respond to the particular preferences of their diverse customer bases is largely determined by the personal relationships farmers are able to establish with customers through the direct marketing opportunities provided by farmers markets. In a practical sense, these direct market relationships are creating valuable economic links between local agricultural producers and immigrant and minority populations. The social benefits of these relationships are more difficult to quantify, but no less important—farmers markets have once again become dynamic centers of community and civic engagement, and they are helping to forge important links between diverse members of our population.

¹ Institute of Medicine, *WIC Food Packages: Time For a Change* (Washington, DC: National Academies Press, 2006), 47.

² Ibid.

Concurrent with the rapid, nationwide growth of farmers markets has been the success of the Farmers Market Nutrition Program (FMNP) in enabling WIC clients to incorporate fresh, locally grown fruits and vegetables into their diets. Now operating in 46 states, the FMNP served an estimated 2.7 million WIC clients in 2005. The FMNP is the only initiative guaranteed to provide WIC clients with a reliable source of fresh produce, as well as crucial education concerning the storage and preparation of fresh fruits and vegetables.

With the delivery of relatively small levels of benefits (an average of twenty dollars a year), the FMNP has consistently increased WIC clients' consumption of fresh fruits and vegetables since the program's inception 17 years ago. As the program has matured, state agencies have developed extensive administrative capacity to both deliver benefits and ensure their efficient redemption in a wide variety of market venues. Currently, states issue FMNP vouchers that range in value from two to five dollars, and employ voucher tracking systems that provide accurate and reliable information about program accountability.

With the goal of supporting local farmers markets and ensuring WIC clients have access to the healthiest and freshest food possible, we recommend USDA closely coordinate the proposed WIC fruit and vegetable voucher system with existing FMNP benefit delivery systems. Modeling the new fruit and vegetable voucher system on existing FMNP policies and procedures will allow WIC clients to easily redeem their new vouchers in a process with which many will already be familiar, and generally ease the financial and administrative burden of implementing the revised food packages.

We recommend the USDA take the following specific actions to align the proposed WIC fruit and vegetable voucher system with existing FMNP practices:

1. Farmers markets and other direct marketing venture currently authorized under a state's FMNP guidelines should be automatically eligible for participation in the new WIC benefits scheme.
2. Farmers markets should be exempted from the WIC cost containment requirement imposed on larger retailers, and regulations requiring WIC-approved retailers to operate year-round.
3. Farmers markets offer a wide variety of seasonal fruits and vegetables, and there should be no limits placed on the varieties of items that can be purchased with the new WIC fruit and vegetable vouchers,
4. To the extent possible, the purchase of fresh vegetables should be encouraged over frozen and canned alternatives.
5. If states implement EBT technology for the redemption of WIC benefits, farmers markets should be provided with these systems to the maximum extent practicable.

6. States should be encouraged to provide education and training in conjunction with the new WIC fruit and vegetable vouchers that is consistent with existing FMNP education and outreach programs.

Incorporating these relatively simple policies into the implementation of the new WIC fruit and vegetable voucher system will ease the transition of the new benefits into practice, promote the consumption of healthy, affordable, and fresh fruits and vegetables by WIC clients, and support the continued success of local farmers markets in our communities. SAC appreciates the opportunity to provide these suggestions, and looks forward to working with USDA on this and other policies aimed at ensuring a healthy, sustainable, and equitable food system.

Sincerely,

Tazuer Smith

Tazuer Smith
Washington Representative
Sustainable Agriculture Coalition