



National Milk Producers Federation

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"Connecting Cows, Cooperatives, Capitol Hill, and Consumers"

February 1, 2010

Ms. Debra R. Whitford
Director, Supplemental Foods Program Division
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, VA 22302

RE: Interim Rule, Docket ID FNS-2006-0037-0003, Special Supplemental Nutrition Program for Women, Infants and Children (WIC): Revisions in the WIC Food Packages.

Dear Ms. Whitford:

The National Milk Producers Federation (NMPF) appreciates the opportunity share its perspective on the interim rule revising the food packages for the Women, Infants and Children Supplemental Nutrition Program. The National Milk Producers Federation advances the well being of dairy producers and the cooperatives they own. NMPF's 30 member cooperatives produce the majority of the U.S. milk supply, making NMPF the national policy voice of more than 40,000 dairy producers.

The National Milk Producers Federation supported efforts to update the WIC food packages to reflect current nutrition science. However, we disagreed with USDA's decision to require any changes in the program to be cost-neutral. As we stated in our comments on the proposed rule, this results in food packages that are based as much or more on cost as on science. In particular, we feel the reductions in the amount of cheese that can be substituted for milk in the food packages were ill advised. Likewise, we feel that the Department's interim rule failed to provide a healthy and popular proposed improvement in the WIC program in the decision to not include yogurt in the food packages, as had been recommended by the Institute of Medicine.

Background

Milk and milk products have been a core component of WIC since the program began. The Dietary Guidelines for Americans include low- and reduced-fat milk and

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Scioto County Co-op Milk Producers' Assn.
Select Milk Producers, Inc.
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Tillamook County Creamery Assn.
United Dairymen of Arizona
Upstate Niagara Cooperative, Inc.
Zia Milk Producers

Jerry Kozak, President/Chief Executive Officer

Randy Mooney, Chairman

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milk products as one of three “food groups to encourage,” along with fruits & vegetables and whole grains.

Milk contains nine essential nutrients: calcium, phosphorous, potassium, protein and vitamins A, D, B12, riboflavin and niacin. Among these, calcium is particularly important, since it enhances bone health at every stage of life. Milk and milk products are the major source of calcium in the American diet. Despite this, according to USDA’s *Continuing Survey of Food Intake of Individuals*, calcium is lacking in many diets. Ninety percent of women do not meet their calcium needs and, in the typical age range for women in the WIC program, only 14 percent to 16 percent meet calcium requirements. Among pre-school children, nearly one in three do not meet calcium requirements.

Cheese Reductions

The interim rule greatly reduces the amount of cheese that can be substituted for part of the milk allocation in the WIC food packages. Under the previous rules, women and children could substitute up to four pounds of cheese per month for 12 quarts of milk. Under the interim rule, no more than one pound of cheese can be substituted for children and for non-breastfeeding or partially breastfeeding women. Fully breastfeeding woman can substitute up to two pounds of cheese.

This change appears to have resulted from efforts to offset program costs so that other foods could be added to the food packages. Cheese is popular across many cultures and provides nutrients that both women and children need. In addition, it can be digested more easily by those with low levels of lactase enzyme.

The interim rule justifies the cheese reductions by saying they are consistent with limits on saturated fat, total fat and cholesterol in the Dietary Guidelines. However, it is not the *amount* but the *type* of dairy products in diets that is important. The interim rule acknowledges this in eliminating whole milk for both women and children. In the case of cheese, WIC participants have a wide variety of regular and reduced-fat products from which to choose. Given the nutrient content of cheese and its popularity among those served by WIC, it is a mistake to limit its availability to the extent indicated in the interim rule.

Yogurt

The interim rule rejects a recommendation from the Institute of Medicine to allow yogurt to be substituted for milk in the food packages for both women and children. This is a serious mistake. Yogurt is highly nutritious, highly palatable and, like cheese, well tolerated by those who have trouble digesting lactose. In addition, it is a widely consumed dairy product across the diverse cultures represented in the WIC program.

The Department concedes that it declined to include yogurt in the revised food packages for reasons of cost. However, the wide appeal of yogurt contrasts with the limited appeal of other foods that are allowed as milk substitutes, notably fortified soy beverages and tofu. There is no indication that cultural groups served by the WIC program prefer soy beverages. In fact, soy beverage consumption is very low among the three largest populations served by the WIC program: Hispanics, non-Hispanic whites and African-Americans.

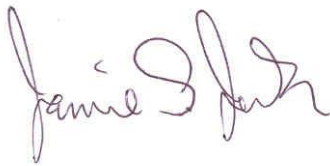
A just-completed pilot project casts further doubt on USDA's decision. In the pilot, sponsored by the National Dairy Council, General Mills and others, yogurt vouchers were offered to women participants at two California WIC centers for a limited period. The women were overwhelmingly eager to substitute some of their milk vouchers for yogurt vouchers and tended to consume yogurt without decreasing their consumption of other dairy products. That suggests that adding yogurt to the WIC food packages would result in a net increase in nutrient consumption.

This was clearly a decision that cannot be defended on scientific or nutritional grounds. Yogurt was not included because it would be a popular choice; soy appears to have been included because few participants would choose it. We urge USDA to look for other trade-offs that could allow yogurt as a substitute for milk in the food packages for children and women.

Conclusion

The interim rule contains many improvements in the WIC food packages. But some changes are unwarranted and could be harmful to the program's success. We appreciate this opportunity to comment and hope the Department will modify the interim rule to address our concerns.

Sincerely,

A handwritten signature in purple ink that reads "Jamie S. Jonker". The signature is fluid and cursive, with the first name "Jamie" and last name "Jonker" clearly legible.

Jamie S. Jonker, Ph.D.
Vice President, Scientific & Regulatory Affairs