

Supplemental Food Programs Division

Food and Nutrition Service, USDA

3101 Park Center Drive, Room 528

Alexandria, Virginia 22302

SEP 25 2006

F-1

Dear Ms. Daniels

As an Arizona farmer, I am writing to you in support of the addition of fruits and vegetables to the new WIC food package that can be used in farmers markets.

The use of WIC food instruments in farmers markets will allow WIC participants to access a variety of fresh, high quality, locally grown produce. With the introduction of fruits and vegetables into the food package, the Farmers Market Nutrition Program will be able to help provide many needed nutrients to WIC participants

Sincerely,

John T. Kueh

HC 65 Box 6259

AMADO, AZ 85645

Fruitwood Farms Inc

SEP 26 2006

412 ELL RD
VIRGINIA BEACH, VA 23462
(757) 485-7748
(855) 685-8104 fax

F-2

September 22, 2006

*Patricia Daniels
Supplemental Food Programs Division
Food and Nutrition Service
USDA
3101 Park Center Dr., Room 528
Alexandria, VA 22302*

Dear Ms. Daniels,

I am writing to you to voice my opposition to the supermarket accepting the fresh produce vouchers issued by the WIC and Sr. Programs.

As a farmer I provide the recipients of these vouchers with the freshest picked produce possible. A supermarket cannot guarantee the freshness that is possible here at the farm.

Another point that I would like to make is the fact that the program has never allowed processed produce. We have argued to no avail in the past that fresh honey and fresh pressed apple cider should be part of the program as it is fresh. The program has never recognized either as fresh because it is considered processed to put it into the container. As I understand the supermarket program will package the fresh products into a "food package" – therefore putting it into the same category as my honey and apple cider.

Finally, most supermarket employees have no idea which produce is local to their store. I have on many occasions shopped at the local supermarket in my area where the South Carolina Peaches are tagged on the fruit and the sign above states "Jersey Fresh".

Who better than the local farmer to regulate the fresh produce for this program? I do not think you can find someone more qualified.

Thank you for your time and consideration.

Sincerely,



*Mike Nelson
Farm Manager*

OCT 10 2006

New Minglewood Farm
99 County Route 52
Greenwich, NY 12834
518-692-8579
October 9, 2006

F-3

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of agriculture
3101 Park Center Drive Room 528
Alexandria, Virginia 22303

Dear Ms. Daniels:

REF Docket ID Number 0584-AD77-WIC Food Package Rule

As a vegetable farmer in New York State that sells my produce at the Saratoga Farmers' Market, I am writing to support the proposed revisions to the WIC food package rules.

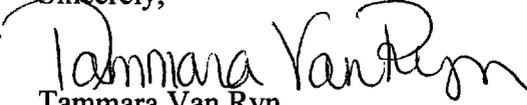
We are strong proponents of the WIC Farmers' Market Nutrition Program, which we have been enrolled in for the eight years we have owned our farm. The FMNP enables many of our customers to buy high-quality, healthy, local produce that they would not be able to otherwise purchase.

We hope that regular WIC participants can soon enjoy the benefits of having fresh produce as part of their standard WIC package. We have an employee who qualifies for WIC but no longer takes part in the program because she was not able to purchase the healthy, local food that she wanted to provide for her child. The proposed change in WIC will make a world of difference to children, mothers and local producers of fruits and vegetables.

The FMNP works extremely well in New York State, and we hope that the same system can be used to extend the benefits of fresh local produce to many more WIC recipients.

Thank you for your consideration of these comments.

Sincerely,


Tammara Van Ryn
Co-owner

729 Haywood Rd., Suite 3

Asheville, NC 28806

001 2009
36 NT
ASAP
Appalachian
Sustainable
Agriculture
Project

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, Virginia 22303

Dear Ms. Daniels,

I am writing in response to **REF Docket ID Number 0584-AD77-WIC Food Package Rule**. Let me state explicitly that I strongly support the proposed legislation, especially the provision that makes farmers' markets eligible WIC markets. However, I sincerely hope that no harm or reduction of the WIC Farmers Market Nutrition program results from this proposed legislation.

I fervently hope that farmers' markets be allowed to participate as seasonal vendors and exempt from the WIC-only cost containment requirements. This would be a boon to our local farmers but they cannot be required to carry a full-range of WIC food package products. It is far more important that they instead can offer a wide variety of fresh, locally grown food.

I believe that there should be no limit placed on the type of fresh fruits and vegetables that may be purchased with the new fruit and vegetable coupons. The consumer and the farmer would both benefit greatly if this were made possible.

Thank you for your attention.

Sincerely,



Emily Jackson
Appalachian Sustainable Agriculture Project

F-4



We envision a picturesque and productive working landscape connecting local farmers to their communities and regional markets.

Our goals are to increase opportunities for profitable, sustainable production and sale of high quality food and agricultural products; and to expand consumer choices for locally produced healthy food.

PO Box #388

Westport NY 12993

(518) 962-4810

OCT 11 2006

October 11, 2006

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, VA 22303

F-5

Dear Ms. Daniels:

REF Docket ID Number 0584-AD77-WIC Food Package Rule

I am writing to offer the support of Adirondack Harvest for the revisions in the WIC food packages as proposed by USDA. As our organization strives to keep agriculture alive and profitable in the Adirondacks, we are constantly on the lookout for ways to connect the community with local food.

We have many thriving farmers' markets in the Adirondacks, and we have seen, firsthand, the benefits to both consumer and farmer of the Farmers' Market Nutrition Program. Farmers' markets are growing in size and number, especially over the last couple of decades. Many low-income mothers, however, continue to be challenged with a lack of access to truly fresh local fruits and vegetables. The farmers' markets are the natural source for these foods and being able to use these proposed WIC checks at the farmers' markets makes sense. In addition, the growers at the farmers' markets often plan their crops to the tastes and needs of the North Country, providing local residents with produce they may not find at the large grocery store chains.

Much of our area is both rural and low-income with an added challenge of scarce nutrition education. Our organization works closely with the Eat Smart New York program to help provide the families in our region with the nutrition information they need to make healthy food choices. Promoting healthy eating amongst mothers and children sets the stage for making good food choices for life.

While we support the proposal to offer WIC checks that may be used at the farmers' markets specifically for use with fruits and vegetables, we hope that this will in no way affect the future of the FMNP program which has been so beneficial to many farmers' market participants in the rural North Country. We also would like to see both programs

OCT 10 2006

October 10, 2006

Patricia Daniels
Supplemental Food Programs Division
Food and Nutrition Service
USDA

F-6

Dear Ms. Daniels: REF Docket ID # 0584-AD77-WIC Food Pkg. Rule

I manage a small (17 vendors-big for Massachusetts) farmers' market here in Springfield, MA. We accept WIC and elder farmers' market coupons. I see what a benefit to our small farmers these coupons provide.

I heartily support the proposed changes to the WIC program, especially the part that allows the grocery store coupons to be used at farmers' markets.

One of the things that I have noticed about the young people who use WIC coupons, is that they don't know much about vegetables. Fruit they know. (They don't know when it is in season because I am often asked for strawberries in September. After all, they're in stores year-round.)

I often cook at our market and I always have recipes using seasonal ingredients available for the taking. I write a weekly newsletter and encourage everyone to try something different each week.

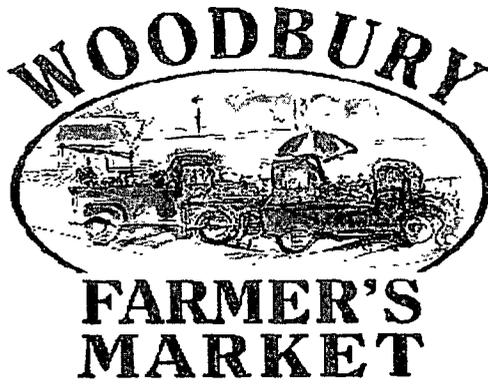
The WIC coupons that are for farmers' markets get the folks coming, additional coupons will keep them coming back. Great idea!

Sincerely,

Belle Rita Novak

F

Belle Rita Novak



SEP 29 2006

F-1

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

RE: Docket ID Number 0584-AD77, WIC Food Packages Rule

Dear Ms. Daniels:

Regarding the above mentioned proposed rule, I would like to offer the following comments:

I believe that WIC/FMNP participants' vouchers must be dedicated solely to purchasing fresh, **LOCALLY** grown fruits & produce, in season, and that these purchases must be made directly from the grower at farm stands and community farmer's markets, as is currently the case.

In Gloucester County, New Jersey, WIC/FMNP participants receive their vouchers in June and can use them over a few months time. That means that WIC/FMNP participants can purchase a wide variety of locally grown produce, while it is in season, when it is at the height of its freshness and nutritional value, directly from the grower.

If WIC/FMNP participants were allowed to use their vouchers at grocery stores, they would not necessarily be buying local produce, and certainly would not be buying directly from the grower. Grocery stores stock their produce department with produce from around the globe. Even when local produce is available, it only represents a small percentage of the produce section.

Woodbury Farmer's Market, Inc.

PO Box 180 · Woodbury NJ 08096
856-845-1300 ext.123 · vhorn@woodbury.nj.us

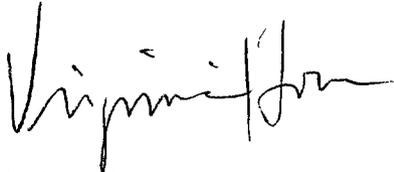
Buying directly from the grower benefits both the grower and the WIC/FMNP participants. From the grower's perspective, selling directly to the consumer provides the grower with a better income than if he sold to a market. There is an urgent need in this country, and in New Jersey, and in Gloucester County, to help small farms remain sustainable and profitable. It has been shown that one of the best ways for that to happen is for growers to direct sell to the public. At our community farmer's market, in Woodbury, NJ, a small, urban city, our farmers tell us that many of their customers buy with WIC/FMNP vouchers.

From the WIC/FMNP participant's perspective, purchasing directly from the grower provides them with the freshest and most nutritious produce. This farmer to consumer relationship is also educational - the consumer learns that farming is a real job, performed by real people, who take pride in feeding us. Again, educating the public on the importance of, and the purpose of, family farms is vital to sustaining family farms.

By removing the WIC/FMNP component from this relationship, another blow will be struck against our local family farms. Please help us to keep family farms strong by not adopting the proposed WIC Food Packages Rule.

Thank you.

Sincerely,



Virginia Horn
Woodbury Farmer's Market
PO Box 180
Woodbury NJ 08096
856.845.1300 x123
vhorn@woodbury.nj.us

Woodbury Farmer's Market, Inc.

PO Box 180 · Woodbury NJ 08096
856-845-1300 ext.123 · vhorn@woodbury.nj.us



Trenton Market Growers Co-op Assn., Inc.
TRENTON FARMERS' MARKET

Trenton, New Jersey 08648
TELEPHONE 609-695-2998 FAX 609-695-0266
www.thetrentonfarmersmarket.com

OCT 13 2006

F-11

October 13, 2006

Dear Patricia N. Daniels,

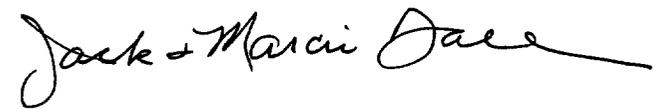
The board of directors of The Trenton Market Growers Co-op Association, Inc. was recently made aware of the potential new ruling for WIC participants to be allowed to choose to purchase fresh produce from supermarkets through out the year. The Board of Directors feel this will have a very deleterious affect upon our Farmers Market. Our market has been at this location since 1948 and we have survived the onslaught of many new supermarkets in our vicinity, however, with supermarkets able to offer the public all kinds of specials due to their buying power It becomes more and more difficult for us to survive. The WIC program has been a great assistance to our farmers and also to the WIC participants. Here at The Trenton Farmers Market those utilizing WIC checks have been able to get the freshest possible produce coming direct from local farms and picked only hours before purchase, unlike supermarkets who ship to a central warehouse and then distribute to their various locations.

The Board of Directors who consist of all farmer members of our Co-op have asked that you reconsider your position and allow WIC participants to continue to utilize their checks at Farm Markets ONLY! This will continue to be a great help for us to continue our survival and allow your participants and suburban and urban families to continue to be able to purchase the freshest, most nutritious fruits and vegetable at our retail location...DIRECT FROM THE FARMER!

We here at the Trenton Farmers Market have worked for the past three years to assist WIC participants by taking produce on a weekly basis to various senior housing centers. This past summer we visited ten local centers to make fresh produce available to in many cases seniors who are not able to commute to the market. This too was a help to our farmers but we feel we provided a very needed service for our local senior citizens enabling them to enjoy the nutritious local harvest of New Jersey and also giving them a opportunity to redeem their vouchers!

We thank you in advance for your consideration!

Sincerely,

A handwritten signature in black ink that reads "Jack + Marcia Ball". The signature is written in a cursive, flowing style with a long horizontal line extending to the right.

**Jack and Marcia Ball
Managers**

OCT 18 2006

Farmer Al's Market
387 Buckelew Avenue
Monroe Twp., NJ 08831

DOCKET ID# 0584-AD77
WIC FOOD PACKAGES RULE

October 20, 2006

RE: USDA's WIC Food Packages Proposed Rule Change

In response to the USDA's proposed changes, we feel that if this proposal becomes reality, many WIC participants would not attend local community farmers' markets and would instead choose to purchase their fruits and vegetables at local supermarkets. This proposal would directly contribute to more family farms being forced out of business, due to the reduced volume of WIC checks being redeemed at farmers markets. These checks are a main source of income for local farmers. Many family farmers attend community markets as their main outlet for direct marketing of fresh fruits and vegetables.

The State of New Jersey has been actively involved in supporting and preserving family farms and we feel this proposed change will be detrimental to this effort. The State has also been working strongly for many years to develop the community farmers market system in New Jersey (over 80 markets), and the proposed changes to the WIC program has the potential to do serious damage to the many markets serving the WIC population in the state, especially inner city markets.

Fresh fruits and vegetables from a local farmers' market are certainly fresher and more nutritious than those sold at a local supermarkets. Farmers harvest daily but supermarkets cannot offer such fresh produce. Also, produce supplied to supermarkets is in the food chain for an extended period of time before the consumer can purchase it. We strongly urge you not to make this proposed change since, in our opinion; it will not benefit the WIC participants and definitely not the local farmers.

Larry and Pat Jacobsen, owners
Farmer Al's Market

F-12

OCT 18 2006

PHILLIPS FARMS

290 CHURCH ROAD MILFORD, NEW JERSEY 08848

(908) 995-0022 FAX (908) 995-2823

F-13

Patricia N. Daniels-Director,

Supplemental Food Programs Division,

Food and -Nutrition Service USDA

RE : Docket I.D. 0584-AD77 WIC Food Packages Rule

October, 16 2006

Dear Ms. Daniels;

My family operates a 150 acre fruit and vegetable farm in New Jersey . We sell 95% of our produce at New York City Farmers Markets. Approximately 25% of our income is through the redemption of Farmers Market Coupons administrated by New York State. Changing the current rule to allow produce to be purchased year round in supermarkets would not be giving the recipients the freshest and most nutritious food possible as we provide in local farmers markets and it would also undermine the secondary effect of promoting local agriculture and preserving farmland. Loss of income from this program would have a drastic affect on our farm. Please consider all of the advantages of this program as it is before making changes that would be inconsistent with it original intent.

Sincerely,



Marc R. Phillips

OCT 19 2006

UNION COUNTY
BOARD OF AGRICULTURE
300 North Avenue East
Westfield, NJ 07090
908-654-9854
FAX 908-654-9818

Handwritten: F-15

10/18/06

Patricia N. Daniels
Director, Supplemental Food Programs Division
Food and Nutrition Service
USDA
3101 Park Center Drive
Room 528
Alexandria, Virginia 22302

Dear Director Daniels,

The Union County Board of Agriculture is writing to you in response to proposed changes in the way Certified Farmer Vendors do business with the Women, Infant, and Children (WIC) Farmers Market Nutrition Program (FMNP) participants. In the August 7th Federal Register, the USDA's Food and Nutrition issued a proposed rule which will revise regulations concerning the WIC food packages. Under the proposal, WIC participants will be allowed to purchase fresh produce from supermarkets throughout the year.

Our Board members are against these proposed changes as these changes will lessen the potential of Certified Farmer Vendors, our local growers, to direct market and sell to our consumers. We need to support our growers who participate in the program and not lessen their ability to sell directly to consumers. If the WIC participants choose to purchase their fresh produce at supermarkets instead of local farms and farmer markets, this will conflict with our growers who sell directly to consumers. Please discourage the implementation of this ruling as it is being proposed. Thank you,

Richard Montag
President
Union County Board of Agriculture

October 24, 2006

Rolling T's Farm
Mary Tomaszewski
779 County Route 12
New Hampton, NY 10958

F-17

OCT 26 2006

Patricia N. Daniels
Director
Supplemental Food Programs Division
Food and Nutrition Service, USDA
3101 Park Center Drive, Room 528
Alexandria, Virginia 22302

Dear Ms. Daniels,

It has been brought to our attention that you are going to change the way that Certified Farmer Program is going to be handled.

We presently are very happy with the way New Jersey is handling the WIC program and we think this is a plan that could and may be used in other states as well. It helps to keep us smaller farmers in business and we are also educating people how to use the food they are purchasing and to encourage them to try other foods as well, such as squash, etc.

With so many farmers going out of the business because of having to work thru a middle man this farm market has really helped out. I do not think it is necessary to have a machine to scan a card for these items either. Currently they are handed checks and we bank them. A machine at the market would only tie things up for the cash customers.

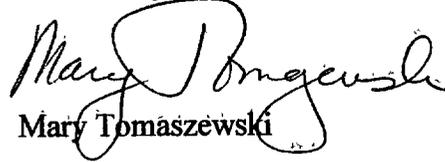
It does bother me that they won't be purchasing local produce but also that from other countries. When they turn in a check for cherries at \$3.99 a lb. or grapes it really upsets us as well as others who are hanging in and not buying those items. Most of these during the winter come from other countries....I know as I just purchased oranges from South Africa-3 for \$1 (great price) and I'm sure those in South Africa appreciate our purchase but I sure don't buy grapes and cherries for \$3.99 a lb. What about those that are ahead of you when you are out shopping and they are buying shrimp and steak in one cart and beer, soda, etc. in another cart. It also upsets us when they pull up with a 2005-06 car and we are driving a 1998 mini-van.

How are we going to convince our kids to go into farming? One daughter is trying to get a foot in the door but if she can't make it we will all suffer. Small farmers have been in a decline for years and some attempt to farm and find out it is more work than they can

handle. My husband and I will continue farming as we are in our 70's and there are still bills to pay off--or we will have to sell out also.

We don't know what the answer to this dilemma is as we know there are people who do not have a good diet and that there are people in the US that go to bed hungry at night. But please reconsider the fact that when local fruits and vegetables are in season they should buy from local farmers. They are helping to feed us also when they are making their purchases at no further cost to the taxpayer.

Very truly yours,



Mary Tomaszewski

Phone: 845-355-7011

Additional contact:
Daughter taking over:
Cathy Conklin
845-355-7901

OCT 26 2006



NAFMNP

NATIONAL ASSOCIATION OF FARMERS' MARKET NUTRITION PROGRAM

October 2, 2006

F-19

Board of Directors

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*Maria Menor, President
Oregon*

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*Western
Trish Newman, Nevada*

Executive Director

Phil Blalock

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

Dear Ms. Daniels:

This letter transmits comment on the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): revisions in the WIC Food Packages; Proposed Rule (7 CFR Part 246), on behalf of the National Association of Farmers' Market Nutrition Programs membership. The following recommendations pertain to the Food Delivery Systems section (246.12) of the regulations.

We commend USDA on this long awaited revision of the WIC food package to include fruits and vegetables. Farmers' Market Nutrition Programs have been delivering fresh fruits and vegetables to WIC families for fourteen years and have seen the benefits in our states and WIC populations. We are pleased that we have been a positive force in this effort and will continue to cultivate new opportunities for consumers to buy fresh produce from local growers.

Our comments are based on two major concerns expressed by our members: One is that small and local growers have the opportunity to easily participate in federal programs. The second is that states have as much flexibility as possible to make the implementation simple and cost effective. The Association is making four recommendations:

WIC and FMNP Funding

The Association recommends that states operating WIC FMNP's be allowed the option to transfer some or all WIC fruit and vegetable funds from the WIC program to their FMNP; thereby, placing the funds under the authority of 7 CFR 248. The maximum amount would be determined by the eligible number of recipients times the dollars allowed for the months when the FMNP is in operation in that state or local area.

Rationale: Since FMNP operations vary greatly from state to state, some FMNP's are administered by agencies other than the WIC state agency. The transfer of WIC fruit and vegetable voucher funds to the FMNP could reduce duplicate food instrument printing costs, compliance costs, vendor management costs and other administrative costs. Rules could be developed to ensure compliance, and WIC would benefit from the existing compliance structure within the FMNP programs now.

Vendor Authorization

The Association recommends that a farmer/farmstand/and/or farmers' market participating in the WIC FMNP be automatically eligible as an authorized farmer/farmstand/and/or farmers' market to accept WIC fruit and vegetable vouchers. This could be labeled as an adjunct eligibility or special dispensation under current rule. WIC routing numbers and FMNP vendor numbers could be adjusted to accommodate duplications.

Rationale: The Association applauds USDA's farmers' market promotion efforts and urges FNS to maximize opportunities for small, local growers to participate in all federal nutrition programs. Since they are only able to produce seasonally and are limited to fresh fruits and vegetables that they grow, excessive vendor eligibility requirements would be cumbersome and discourage participation. This would also alleviate vendor administrative costs and utilize existing FMNP structure and personnel for vendor sign-up and compliance. The FMNP's have a history of program integrity and expertise in vendor compliance.

Voucher Denomination

The Association recommends that States have the option to determine the WIC fruit and vegetable food instrument denominations.

Rationale: Years of experience have enabled FMNP agencies to determine the denominations that work best for their areas and seasons. Some have found that smaller denominations are cost effective and improve redemption rates, while larger denominations achieve those objectives better in other states.

Voucher Redemption Process

The Association recommends that states operating the FMNP be allowed to apply their FMNP food instrument redemption procedures to the redemption of WIC fruit and vegetable vouchers at farmers markets.

Rationale: Federal policy now encourages state agencies to align policies and procedures for more efficient administration of federal programs by states (e.g., Food Stamps, Medicaid, TANF). Similarly, states should be permitted to align their FMNP and WIC redemption procedures at FMNP redemption sites, such as latitude in requirements for recipient identification or signatures on vouchers. Alignment of FMNP and WIC fruit and vegetable voucher redemption rules would reduce administrative costs and make the process more understandable and efficient for participating farmers and markets as well as for WIC participants.

We would like to request a meeting with you, your staff and any others you deem appropriate to further discuss the rule, these comments and the implications of the new food package with regard to the FMNP's. Our Association Executive Director, Phil Blalock, will be in touch with your office regarding the potential for such a meeting, and invites you to contact him at 703-837-0451 with any questions or comments.

Respectfully,



Maria Menor, President
NAFMNP

MM/pb

OCT 31 2006

K-24

10/31/06

Dear Patricia Daniels,

I am writing in regards to
REF Docket ID Number 0584-AD77-
WIC Food Package Rule

As a farmer who participates
in several markets and some
where WIC vouchers are used
to purchase fresh organic
and other fruits & vegetables,
I am cheered to see that
these produce is included
in the FMNP (Farmer Market
Nutrition Program) administered
by WIC.

I would definitely like to
see this program continued
and that present funding
~~continue~~ that makes farmer
markets eligible WIC vendors
with no limit on the type
of fresh fruits & vegetables
that may be purchased with
the coupons. There appears
to be a growing number of
families & elderly benefiting
from this program at our
markets.

Thank you for your
attention, Sincerely, Pat Tompkins
Bakersville, NC.

OCT 31 2006



Farmers' Market Federation of New York

2100 Park Street
Syracuse, NY 13208
315-475-1101
315-362-5012 (fax)
www.nyfarmersmarket.com

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

F-25

October 27, 2006

Dear Ms. Daniels,

On behalf of the members of the Farmers' Market Federation of New York, thank you for the opportunity to comment on the Special Supplemental Nutrition Program for rules revisions to the WIC Food Package (7 CFR Part 246) to include fruits and vegetables. This additional benefit for WIC families will, undoubtedly add to the health of young children, setting the course for a healthy start in life. For farmers, it may open new markets in the wholesale distribution network for both fresh and processed fruits and vegetables.

Our concern, however, rests with the small, family farms that are involved in the direct marketing of their fresh fruits and vegetables. Currently, the Farmers' Market Nutrition Program (FMNP) provides a once-per-season benefit to WIC families to purchase fresh fruits and vegetables at farmers' markets. This program is highly successful in the states where it is operating and the proposed WIC rule revision is an opportunity to expand on the nutritional benefits and agricultural opportunities of the FMNP. It is also an opportunity for the WIC rules to take the experiences of the FMNP, incorporate them into the regulations, and create a set of rules that maximizes the usage of the vouchers within the WIC community, as well as generate the greatest level of participation among farmers and farmers' markets. Therefore, we would encourage USDA to allow as much flexibility in the implementation of the new fruits and vegetables benefit as possible to encourage participation by farmers and farmers markets and to promote the consumption of fresh, locally grown fruits and vegetables.

Recommendation: Allow states to use FMNP certification procedures to authorize farmers' markets and individual farmers as vendors to accept the WIC fruits and vegetable vouchers.

Because the nature of farmers and farmers' markets is significantly different than a traditional WIC vendor, given the limited product lines and the seasonality of the businesses, it would be simpler and more realistic to create "buy-in" to the program from both farmers and markets if entry to the program was tailored to match that of the FMNP program. By simplifying the entry process, it would encourage greater participation of farmers and farmers markets, and provide WIC consumers with greater access to fresh, locally grown fruits and vegetables.

Our mission is to support and promote the viability of farmers' markets through innovative services, programs and partnerships that maximize the benefits of markets to sellers, buyers and communities.

Recommendation: Allow states to ease restrictions and penalties for farmers and farmers markets to more closely align with the FMNP regulations.

Current penalties for even minor infractions are significantly out of proportion to any financial rewards farmers and farmers' markets would receive from participation as a WIC fruits and vegetables vendor. However, in New York State, the FMNP has its own rules and regulations with penalties for non-compliance that is more in keeping with the culture of farmers and farmers markets and in financial proportion to any financial benefit they may receive from participation in the program. Similar sets of regulations will generate greater participation from farmers and farmers markets and less confusion, benefiting WIC consumers with a wider choice in farmers and markets where they may be able to use their WIC fruits and vegetables benefits.

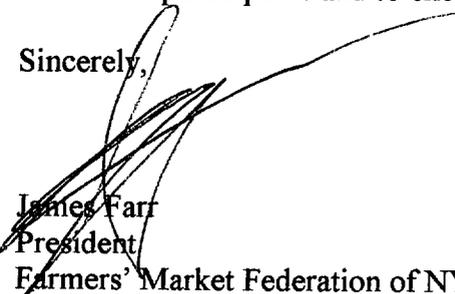
Recommendation: Allow states to determine the WIC fruit and vegetable instrument denomination.

Each state has experience from operating the FMNP programs and have determined the optimum level of benefit to correspond to the seasonality of their markets and to increase redemption rates. States should be able to draw on this experience to determine the level of benefits that would optimize usage by WIC consumers, creating a balance with the reimbursement processing needs of the WIC vendors.

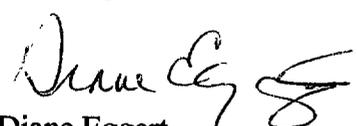
Recommendation: Allow states to implement FMNP redemption procedures to WIC fruits and vegetable vouchers used at farmers markets.

Again, states have spent several years developing efficient FMNP programs, including their redemption processes. The efficient manner in which this is conducted is known to farmers, is simple in its process and maximizes farmer and market participation. The WIC fruits and vegetable vouchers, used at farmers' markets should be given the same procedures as the state's FMNP program to minimize confusion among the farmer participants and to encourage the greatest level of participation as possible.

Sincerely,


James Farr
President
Farmers' Market Federation of NY

Sincerely,


Diane Eggert
Executive Director
Farmers' Market Federation of NY

OCT 31 2008



Community Farm Alliance

614 Shelby Street Frankfort, KY 40601 ~ (502) 223-3655 ~ www.cominunityfarmalliance.org

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, Virginia 22303

F-29

Dear Ms. Daniels,

On behalf of the membership of the Community Farm Alliance, please accept these comments regarding REF Docket ID Number 0584-AD77-WIC Food Package Rule

I am pleased to learn that the WIC food package is under review for considerable change. I strongly support the proposed regulations, especially the provision that makes Farmers' markets eligible WIC vendors. I am proud to be a part of an organization that aims at bridging the gap between small farmers and the urban underserved. The Community Farm Alliance was the first in the state of Kentucky to develop markets in urban underserved neighborhoods, accepting food stamps, and SFMNP coupons. While we have showcased the need for the FMNP in Jefferson County through extensive studies and pilot programs, due to funding constraints, we have been unable to secure the grant to provide access to the 12,800 of the state's WIC families that live here.

I am very hopeful that the funding for the FMNP will increase to allow for these families to benefit, but I am relieved that the proposed WIC changes will provide some assistance to Louisville's underserved residents in the mean time through farmers' markets.

Please ensure that authorized farmers' markets are allowed to vend WIC eligible fruits and vegetables in areas unserved by the FMNP. To make sure the proposed regulations have the desired effect of bringing access to nutritionally underserved communities, it must be acknowledged that many WIC recipients reside in communities that remain unserved by FMNP.

I hope that farmers' markets will be allowed to participate as seasonal vendors, exempt from the "WIC-only" cost containment requirements, and that they not be required to carry a full range of WIC food package products. There should be no limit placed on the type of fresh fruits and vegetables that may be purchased with the new fruit and vegetable coupons.

Thank you for your time and attention.

Sincerely,

Patricia Bell
Market Manager
Smoketown Farmer's Market
Community Farm Alliance

Dorcilla Johnson
Market Manager
Portland Farmer's Market
Community Farm Alliance

NOV - 1 2006

Farm to Table

A Southwest Network

3900 Paseo del Sol ~ Santa Fe NM 87507 ~ 505-473-1004

October 31, 2006

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of agriculture
3101 Park Center Drive Room 528
Alexandria, Virginia 22303

F-31

Dear Ms. Daniels:

REF Docket ID Number 0584-AD77-WIC Food Package Rule

Farm to Table is writing to offer its support for the revisions in the WIC food packages as proposed by USDA. In light of the severe health and dietary challenges confronting many Americans, especially lower income families and children, it is heartening to see a proposal that will allocate a greater share of public nutrition assistance resources for the healthiest foods available. The introduction of fresh fruits and vegetables for the WIC food packages will not only encourage healthy eating for the program's mothers and children now, but will also encourage a lifetime of healthier eating for these families and individuals.

Our organization is a non-profit whose mission is to promote locally based agriculture through education, community outreach and networking. Farm to Table enhances marketing opportunities for farmers; encourages family farming, farmers' markets and the preservation of agricultural traditions; influences public policy; and, furthers understanding of the links between farming, food, health and local economies. We provide education programs to farmers, ranchers, organizations and agencies and help to develop farmers' markets in collaboration with farmers' market organizations and agencies. Herein are our specific suggestions and possible positive health and economic impacts on WIC recipients and farmers in New Mexico.

We are focusing our request on the increased use of WIC vouchers at farmers' markets. New Mexico has 45 farmers' market of which 39 are currently set up to take the WIC Farmers' Market Nutrition Program (FMNP) vouchers. New Mexico has a 13 year success record in developing and expanding the FMNP program which currently serves over 2,800 WIC clients and close to 900 farmers in the state. The Department of Health has an excellent track record with the program. The New Mexico Farmers' Marketing Association provides professional assistance, education programs, technical assistance to all of New Mexico's farmers' markets and has been a central support for the progress of the FMNP since its inception.

The proposed WIC Package Rules would benefit close to 61,000 WIC clients in New Mexico. Adding the fruit and vegetable voucher program to the WIC package would mean potential sales of approximately \$575,000 to farmers' markets, grocery stores and supermarkets across the state. For a state like New Mexico that is ranked second worst in food insecurity, third worst in hunger and spends more than \$324 million in health related costs, this program would truly benefit mothers and children who are considered low-income and at health risk.

There are 22 Native American pueblos and reservations in New Mexico that are home to more than 170,000 people. Of these Tribal communities, three have established farmers' markets. There is a commitment by an additional six pueblos to begin farmers' markets in the next two years. The change in the WIC Rules could be of great benefit to these communities.

The New Mexico Food and Agriculture Policy Council strongly supports the following:

- The new WIC package be specific to **fresh** fruit and vegetable purchased with the vouchers.
- "Do no harm" to the WIC Farmers' Market Nutrition Program. Do not reduce FMNP funding or establish procedures that would adversely affect its operation or effectiveness;
- The proposed regulations, especially the provision that makes farmers' markets eligible WIC vendors.
- Where states or tribes currently operate WIC FMNPs, encourage state and tribal agencies to coordinate the implementation of the new fruit and vegetable program with the WIC FMNP.
- That farmers' markets to be allowed to participate as seasonal vendors, to be exempt from the "WIC-only" cost containment requirements, and not be required to carry a full-range of WIC food package products.
- That no limit placed on the type of fresh fruits and vegetables that may be purchased with the new fruit and vegetable coupons. This is specifically important for our Native American and ethnically diverse communities.
- Farmers and farmers' markets that are currently authorized under state WIC FMNP procedures shall be automatically eligible for vendor specification under the new fruit and vegetable voucher program. These WIC FMNP farmer and farmers' market authorization procedures shall also be applied by states in the future vendor specification process.
- States shall be required to allow farmers' markets as eligible vendors for fresh fruits and vegetables, with the provision that they comply with farmers' and farmers' market authorization procedures.
- In the event that states adopt EBT technology for the use of nutrition benefits by WIC recipients, farmers' markets must also be provided with the most practical EBT systems for the fruit and vegetable redemption process.

Thank you for the opportunity to provide input to the newly proposed WIC Rules and for your consideration of our specific requests. Please feel free to contact us if you have any questions. We can be reached at 505-473-1004.

Yours truly



Pamela Roy
Co-Director



The Friends of Central Market

NOV - 1 2006

F-32

October 31, 2006

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of agriculture
3101 Park Center Drive Room 528
Alexandria, Virginia 22303

Dear Ms. Daniels:

REF Docket ID Number 0584-AD77-WIC Food Package Rule

I am writing to offer the support of the Friends of Central Market (FoCM) for the revisions in the WIC food packages that are proposed by the USDA. We heartily endorse the assistance that this proposal offers to those Americans who are economically challenged to include the healthiest possible foods in their diet.

This proposal will be extremely meaningful to our community. Its pastoral reputation notwithstanding, Lancaster is seeing increasingly high levels of poverty throughout its city population, and the concomitant public health trends: high rates of infant mortality, with obesity, diabetes, and heart disease in its adult population.

We are fortunate to have a centrally-located and pedestrian accessible farmers market as an anchor to our local food system. This market is a source for both seasonal and year-round fruits and vegetables. Nonetheless, we know from our demographic surveying of the Central Market and the surrounding neighborhoods that the single most important factor in encouraging our lower-income citizens to buy fresh foods is whether or not they can use their WIC coupons.

By making farmers markets eligible vendors of produce to WIC recipients (beyond the Farmers Market Nutrition Program), our nutritionally-at-risk populations will benefit immeasurably. Additionally, the USDA proposal potentially, but significantly, can increase the sales for of local farmers at the Central Market. In other words, it harnesses the public dollar to the nutritional benefit of consumers and the economic benefit of our family farmers—an indisputable win-win.

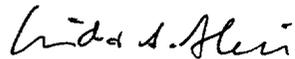
To maximize the impact of this proposal, we also urge the following:

- Maintain the FMNP funding and continue to support the procedures and systems that make it effective
- Make farmers markets and public markets eligible WIC vendors, and automatically qualify those that are currently authorized under state WIC FMNP procedures
- Do not place a limit on the types of fresh fruits and vegetables that may be purchased with the new fruit and vegetable coupons
- Exempt farmers markets and public markets from any requirement to carry a full range of WIC food package products

- To keep pace with inflation, include a cost-of-living adjustment in the value of the vouchers
- Keep the denomination of fruit and vegetable instruments small—at the level of \$1.00 or \$2.00

The proposal offered forth by the USDA is an example of the kind of forward-looking vision that will contribute mightily to the well-being not only of Lancaster citizens, but hundreds of thousands of Americans living in cities and farming communities alike

Sincerely,



Linda S. Aleci
Chair
The Friends of Central Market

linda.aleci@fandm.edu



fort myers
redevelopment agency

NEW DIRECTION ~ NEW ENERGY ~ NEW LIFE

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OCT 31 2006

F-33

October 30, 2006

Ms. Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, Virginia 22303

Dear Ms. Daniels:

Re: Docket ID Number 0584-AD77-WIC Food Package Rule

I am writing to strongly support the proposed revisions in the WIC food packages as proposed by the USDA to allow fruits and vegetables as an addition to the current WIC food package. The Fort Myers Redevelopment Agency operates a weekly Farmers Market in downtown Fort Myers that offers fresh fruits and vegetables, many of them organically grown by local farmers. Our market is within an Enterprise Zone, an urban redevelopment area and it is adjacent to several low income neighborhoods. It is also served by public transportation making it easily accessible to many women who participate in the WIC program. Many of the vendors in our market are also bi-lingual allowing them to assist our local Hispanic population.

Farmers Markets not only offer the freshest fruits and vegetables but most often their prices are considerably below grocery store prices. The vendors are also knowledgeable about recipes and cooking techniques for their products and are happy to share this information to the customers.

I commend you and your team for the forward looking proposal to make fruits and vegetables a regular part of the WIC food package and I encourage the program to include local Farmers Markets.

Sincerely,

Don Paight
Executive Director

NEW SEASONS

MARKET

F-34

NOV - 3 2006

November 3, 2006

Patricia N. Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
USDA
3101 Park Center Drive, Room 528
Alexandria, Virginia 22302

Dear Patricia Daniels,

I am writing to express my strong support of the proposed changes to the current WIC food packages. Countless studies support the additions that these changes would allow. Our new mothers, nursing mothers and children deserve no less.

New Seasons Market would take great pride in offering our WIC customers the greater choice of healthful foods suggested in the rule change. If I can provide any further comment, please do not hesitate to be in touch.

Sincerely,



Doe Hatfield
Community Relations
New Seasons Market

STORE SUPPORT OFFICE

1954 SE Division Street Portland OR 97202 P 503.292.1987 F 503.292.6280

VonThun Farms
519 Ridge Road
Monmouth Junction, NJ 08852
732-329-8656

F-35

November 1, 2006

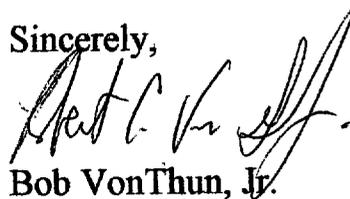
To Whom It May Concern,

As a farmer who participates in the WIC Program, I urge you to take a look at the program, and those individuals the program benefits.

The WIC Program has added a tremendous boost to our farm's income. We sell our homegrown produce in many "downtown" farmers markets, where we receive a large number of WIC checks each year. Although many local supermarkets are now doing a fine job with their produce departments, I feel that by allowing supermarkets to accept WIC checks, the sales of homegrown produce grown on the family farm will suffer. It is no doubt that many of our customers would conveniently buy produce in the supermarket while shopping for their weekly groceries. With most of the produce in supermarkets coming from both out of state, and out of the country, allowing supermarkets to accept WIC checks will be allowing the freshness to be taken out of the WIC Program. If supermarkets were to start accepting WIC checks, there is no doubt that many of the downtown farmers markets would not survive. This in turn, will further reduce the availability of the fresh, homegrown fruits and vegetables to urban residents. Numerous small farms in New Jersey will feel the loss of these farmers markets. Many of these small farms are already facing tough times with rising production costs. The small farms ability to sell crops direct to the consumer is often the link to success and survival.

I hope the future of the WIC Program is reviewed in great detail. Nutrition, freshness, and economic effects the program provides currently benefit both the small family farm and our general public. I hope the WIC Program will stay on the farm and out of the supermarket!

Sincerely,



Bob VonThun, Jr.
Owner & Grower, VonThun Farms

NOV 04 2006

October 30, 2006

F-37

Patricia Daniels, Director
Supplemental Food Programs Division
USDA – Food and Nutrition Service
3101 Park Center Drive, Room 528
Alexandria, VA 22302

Dear Ms. Daniels:

Since the inception of the New Jersey WIC Farmers' Market and Nutrition Program have been "win-win" programs for the growers and consumers of New Jersey. They are the first USDA programs that make an attempt to help the vegetable and fruit growers of New Jersey. The programs not only bring some additional revenue to the growers, but also bring a whole new consumer group to the local farm markets, and tailgate markets throughout the state. Many of the tailgate markets are located in urban areas where more than fifty percent of daily sales of fresh Jersey fruits and vegetables may be accounted for in WIC checks. Without this additional income, most farmers would not travel to these markets causing tailgate markets to close, and urban communities to lose access to locally grown produce.

The only way the WIC program could continue to be a benefit to the local farm community is to have it remain exactly the way it is now. To allow any redemption in supermarkets, even during the off-season, would cause the complete loss of any benefit to the local growers. All the years we took to develop our markets in order to serve this valued consumer group would be lost.

Furthermore, it is currently a challenge for growers to educate the WIC participants that checks can only be used for the purchase of the fresh produce grown in our state. In the

large supermarket chain environment, this task would be nearly impossible, given the lack of one-on-one communication with customers that a farm market is able to supply. In reality, the proposed rule change of off-season redemption in supermarkets would support the sale of imported produce rather than helping local growers, or any grower in the United States.

Sincerely,

John J. Hauser
President
Hauser Hill Farms
Old Bridge, NJ

Council of
Northeast
Farmer
Cooperatives

Agri-Mark, Inc.
Dairylea Cooperative, Inc.
Dairy Farmers of America
St. Albans Cooperative Creamery
Upstate Farms Cooperative, Inc.

P. O. Box 151240
Alexandria, VA 22315
tel:703 751 0204
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e-mail: bgray15452@aol.com

Robert J. Gray, Executive Director

November 6, 2006

NOV - 5 2006

F#-38

Ms. Patricia N. Daniels
Director, Supplemental Food Programs Division
Food & Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive
Room 528
Alexandria, Virginia 22302

Dear Ms. Daniels:

The Council of Northeast Farmer Cooperatives (CNFC) would like to submit the following comments on USDA's Food & Nutrition Service's proposed rule to revise the regulations governing the Women, Infants and Children (WIC) food packages (Federal Register: August 7, 2006; 7CFR Part 246).

CNFC represents five major dairy cooperatives in the northeast region with over 11,000 dairy producers. Membership in CNFC includes Agri-mark, Inc.; Dairylea Cooperative, Inc.; Dairy Farmers of America (Northeast Council); St. Albans Cooperative Creamery and Upstate Farms Cooperative, Inc. Together these cooperatives produce a major portion of the dairy products consumed in the northeast.

It is our understanding that the proposed rule is to update the current WIC food package by adding fruits and vegetables for WIC participants six months of age and older, eliminate juice from infant's food packages and add whole grains to food packages for children and women. In addition, it would add infant food meat for fully breast-fed infants six through eleven months of age.

Since its inception, WIC has been a critical food assistance program with nearly half of the infants born in the U.S. each year as beneficiaries. With a \$5 billion budget and eight million participants in the program it has provided much needed nutritional balance to diets of many Americans. Dairy products have always been a major part of the WIC program. Almost 30%, or \$1.4 billion of WIC's annual expenditures, go toward the purchase of dairy products for its participants.

Our concern with the proposed rule are two-fold. First, they would significantly reduce the level of dairy products currently available to WIC participants. Secondly, the nutritional value of a number of substitute food items in the rule do not measure up in our opinion to the unique qualities of nutritional benefits provided by dairy products.

- Reduction in dairy products in the WIC program: If the rules as proposed are implemented, fluid milk sales to the program would fall by 23%. For cheese, it is estimated that the decline in sales would be 35% or 40 million pounds. The total value of the loss in sales of dairy products would be about \$400 million or 29% of current WIC annual expenditures on dairy products. These reductions in the use of dairy products will clearly affect both the short and long term nutritional benefits of WIC in a negative way.
- The nutritional value of a number of substitute food items in the rule are of lesser quality. Items such as soy beverage as a substitute for milk in WIC packages for women does not meet the test of improving the nutritional intake of WIC recipients nor do items such as tofu replace the critical ingredients found in dairy products.
- In 1999 WIC initiated the "FitWIC" program to combat the growing national problem of obesity in children and adults. It made USDA a leader in the fight against obesity. And calcium intake is one of the prime combatants to obesity.

More than two decades ago the first federally supported National Health and Nutrition Examination Survey found a significant association between low intake of calcium and being overweight. Subsequent studies have more than verified those findings which clearly link low calcium consumption with excess body weight and excessive weight gain, two conditions that lead to many other health problems and that can shorten life. Dairy foods supply 72% of the calcium in the nation's food supply. In addition the findings of a number of other studies at Purdue University and the University of Colorado demonstrated that high intakes of calcium in non-obese adults were associated with higher rates of fat oxidation. A number of other studies have shown that additional bio-active compounds in dairy products act synergistically with calcium to reduce the risk of obesity.

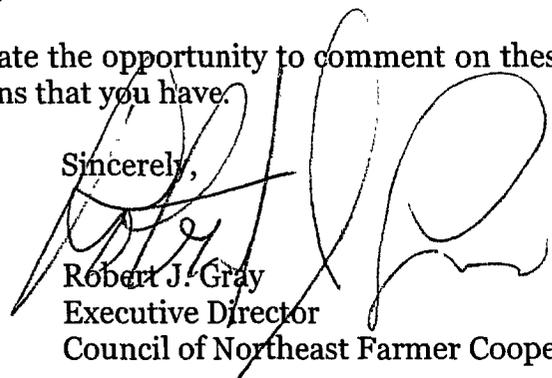
The obesity fighting qualities of milk are now very well documented. Dairy products also supply potassium which has been identified as low in WIC participants diets. It is an excellent source of Vitamin D, protein, Vitamin A and B12 as well as a rich source of a number of other vitamins and minerals.

As stated earlier some of the substituted food items do not measure up nutritionally to dairy products. Although the Institute of Medicine which evaluated the WIC program recommended yogurt for women, it was not included as part of the substitute food items in the proposed rule. And at the same time lactose reduced or lactose free dairy products are not fully considered in the rule.

CNFC would recommend that the Food & Nutrition Service strongly reconsider its reductions in milk and other dairy products in its food package and include other items such as yogurt and consider making lactose reduced or lactose free milk available for those participants who have trouble digesting lactose. And lastly, more cheese product substitution would give WIC participants a wider range of choices.

We very much appreciate the opportunity to comment on these proposed rules and will be glad to answer any questions that you have.

Sincerely,



Robert J. Gray
Executive Director
Council of Northeast Farmer Cooperatives

NOV 02 2006

The Farmers Market at Journal Square

54 Journal Square, Jersey City, N.J. 07306

November 2, 2006

Patricia N. Daniels
Director
Supplemental Food Programs Division, Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive
Room 528
Alexandria, VA 22302

F-40

Dear Ms. Daniels:

I founded the Farmers Market at Journal Square in Jersey City, New Jersey in 1995, and have overseen its operation for nine of its twelve seasons. My Market is one of the highest volume farmers markets in New Jersey, and is patronized by a wide strata of area residents, from commuters to area shoppers and workers to nearby residents to mothers and seniors who come from throughout Hudson County and beyond.

But let there be no doubt – the loss of regular and senior WIC customers will be a severe economic blow to the Farmers Market at Journal Square, and it will destroy many other markets that do not have as wide a base as we do. This devastation will certainly be the case not only in New Jersey, but across the country where farmers markets have, in the last decade, proliferated as valued sources of fresh produce, urban amenities and added income for America's family farmers.

Any suggestion that the change will not necessarily diminish WIC customers at farmers markets defies logic – since WIC recipients who do other shopping at supermarkets will naturally tend to use their fresh produce allotment at those store as well.

But this slight increase in convenience to WIC recipients cannot be justified against the harm it will due to the goals of the Department of Agriculture and to the national good as a whole.

For one thing, the quality of fresh produce available to WIC recipients at a supermarket is simply not comparable to that of the fruits and vegetables at any farmers market. This difference in quality and nutrition is so significant that it more than justifies the somewhat more limited (though hardly onerous) access.

In addition to quality, there is another important benefit which WIC recipients now receive by shopping at farmers markets that they would lose if the proposed changes are enacted: By having the chance to talk with farmers, WIC recipients at my Market -- and most markets, I'm sure – get an education in nutrition, food variety and even cooking.

Patricia Daniels
November 2, 2006
Page 2 of 2

And I've overheard enough of these conversations to realize that many mothers and even some seniors really need this kind of information.

But there is yet another reason why the Department of Agriculture should not even consider this or any proposal that will hurt the income of America's small, family farmers: national security. In an era when insects, parasites and disease can easily travel to our shores from around the world in the normal course of shipping, and just as importantly, in an age when terrorists and other enemies look for every opportunity to harm us, national security demands that we maintain as wide and diverse an agricultural base as possible. Every small farmer in New Jersey or any other state that goes out of business is one more lost bulwark against the threat of pestilence or attack in the nation's heartland. I know from first hand conversations with farmers that the income they get from farmers markets is often the key difference between them staying in business or plowing under their fields forever.

Indeed, we just had a very real demonstration of the value of a wide and diverse agricultural base: Customers flocked to my Market, and certainly to markets through our region, to buy locally grown spinach in the face of the national crisis over supermarket spinach contaminated by E. coli.

The current WIC regulations work well for all concerned. The regulations have gotten incomparably fresh, nutritious produce to mothers with young children and to seniors, provided these recipients with important nutritional information and given America's small family farmers an absolutely vital added income. Any theoretical argument for changing the regulations is far outweighed by the demonstrable harm such a change will do. This is truly a case of, 'Since it isn't broken, don't fix it.'

Respectfully,



Colin Egan
Manager of the Farmers Market at Journal Square

cc: The Hon. Robert Menendez
The Hon. Frank Lautenberg
The Hon. Steve Rothman
The Hon. Hillary Clinton
The Hon. Charles Schumer
Michael Chertoff, Secretary, U.S. Dept. of Homeland Security
Mike Johanns, Secretary, U.S. Dept. of Agriculture
Charles M. Kuperus, Secretary, N.J. Dept. of Agriculture



NOV - 6 2006

168 WEST STATE STREET • TRENTON, NEW JERSEY 08608 • TEL: 609-393-7163 • FAX: 609-393-7072 • E-MAIL: mail@njfb.org

November 3, 2006

To: Patricia Daniels, director
Supplemental Food Programs Division,
USDA-Food and Nutrition Service

From: Peter J. Furey, executive director

Re: changes in WIC food packages;
Docket I.D.# 0584-AD77, WIC Food Packages Rule

WSP/AM
F-41

SUMMARY:

New Jersey Farm Bureau (NJFB) represents a majority of the farmer/retail market operators in the state of New Jersey. Many of these farmers have retail business interests that could be greatly harmed by the proposed rule change. NJFB urgently requests that the USDA consider some adjustment in the rule to avoid these adverse financial impacts of the proposal.

CURRENT STATUS:

The current WIC-FMNP program restricts the redemption of WIC certificates for fresh produce to local farmers markets. In New Jersey, this amounts to a significant amount of retail sales of farm-produced foodstuffs given the tremendous growth of retail outlets by farmers. These outlets can either be markets that are on-site at the farm, or alternately at downtown community farmers markets (also known as "tailgate markets").

In New Jersey, there are about 200 "certified farm vendors" among the farmers in the state. The NJDA reports that WIC redemptions for produce amounted to almost \$800,000 in 2005. Statewide, there are more than 80 community-based "tailgate" markets.

PROBLEMS POSED BY THE RULE CHANGE:

The farmers who operate "tailgate markets" in urban communities are fearful that WIC participants may opt to make all their food package purchases at supermarkets when given the chance. The supermarkets already are able to have processed foods (cheese, bread, etc.) purchased by WIC participants; the change enabling fresh produce items to be included will more than likely divert that retail business away from retail farmers markets in many of our urban areas.

Patricia Daniels, director
Supplemental Food Programs Division,
USDA-Food and Nutrition Service
Page – 2 -

This change, therefore, will undercut the retail sales and also the investments/commitments made by these farmers to date. These markets have faithfully served the needs of the WIC participants, only to see this rule change adversely affect them. In our opinion, approximately ten (10) community markets will collapse as a result of the rule and another thirty (30) will be substantially weakened.

It will be very difficult for the farmers markets to compete with the supermarkets because they can operate year-round and obtain produce from out-of-state at lower costs. In fact, we would expect foreign-grown produce at supermarkets to displace the Jersey Fresh produce now consumed by WIC participants. The rule change also may divert produce sales from places (farmers markets) with an excellent track record for verifiable sales in compliance with WIC rules. Other retail vendors, like supermarkets, cannot match that record for compliance according to feed-back we receive from program observers.

RECOMMENDATIONS:

In light of the foregoing, we believe the rule proposal ought to be changed so that its noble intentions (improve the diets for participants) can be met without adversely affecting the farm businesses who are now involved with the WIC program. Our primary recommendation:

- give the lead state agency the discretion to determine the specifics of implementation. This could enable a stipulation that would allow for produce sales/redemption only at farmers markets when local crops are available (June1-Nov. 15) and supermarket redemptions for the balance of the year. This flexibility for lead state agencies could be given only upon request of an interested state, like New Jersey, which could include a statement attesting to the existence of farmer markets to be disaffected. Currently, these state agencies are already administering other terms of the program and so this new authority would not require new administrative costs.

We respectfully request this change in the rule.

In the alternative, these farmers deserve at least some other program rule change to off-set the anticipated adverse effects. Ideas to consider for these off-sets are to expand WIC redemptions at farmers markets during the entire year (versus the half year now allowed), or to allow farmers the flexibility to sell additional produce items (to supplement products grown on their farm). Either way, some consideration is deserved for these farm businesses.

Patricia Daniels, director
Supplemental Food Programs Division,
USDA-Food and Nutrition Service
Page - 3 -

CONCLUSION:

NJFB does not object to the purpose of the rule change, which is to improve the diet and nutritional intake of the WIC participants. We also appreciate the cost and logistics sometimes of urban transportation. The program, nonetheless, was originally intended in part to facilitate the sale of produce from local farmers as the USDA provided public funds for supplemental food benefits. We question how the USDA can allow those farmers, who have provided a valuable service for many years, to be abruptly let down without any off-setting program change to keep them whole.

Furthermore, in the case of community tailgate markets, these farmers also have provided a wonderful incentive for the rejuvenation of downtown markets and stimulated revitalized commerce districts. Allowing a diversion of the WIC redemptions would do harm to the core business in some of these situations.

USDA's mission of supporting agriculture is seemingly at odds with a potential impact of the rule change. We recommend a discreet yet meaningful modification that will enable a win-win result for everyone concerned.

Thank you for your consideration.

#

cc: Rich Nieuwenhuis, NJFB president
Charles Kuperus, Secretary of Agriculture
Members of New Jersey's congressional delegation
selected New Jersey farmers



October 31, 2006

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive Room 528
Alexandria, Virginia 22303

NOV 02 2006

F-45

Re: **REF Docket ID Number 0584-AD77-WIC Food Package Rule**

Dear Ms. Daniels:

Our organization, Nuestras Raíces is a grassroots organization that promotes community development in Holyoke, Massachusetts through pursuing projects that focus on food, agriculture and the environment. We help low-income youth and adults grow produce in community gardens and start up small farms, and we help them market their produce at the Holyoke Farmers' Market. Thus it is only appropriate that we write to express our strong support for the USDA proposed revisions in the WIC food packages.

Obesity and weight-related diseases are epidemic in our city with disproportionate rates and impacts in our large low-income community. Over 40% of the children in the Holyoke Public Schools are overweight, Holyoke has one of the highest rates of diabetes in the state. In light of the nutrition challenges confronting American families, especially those of lower incomes, you and your team at USDA's Food and Nutrition Service have the opportunity to create a massive change in public nutrition assistance and the accessibility of the healthiest foods available.



There is a dire need for social change in individual eating habits towards fresh produce and it is most effective to implement such a change in our young and easily malleable youth in order to encourage a *lifetime* of healthy eating habits. Farmers' markets and local farm stands are a crucial vehicle for bringing fresh and locally produced fruits and vegetables to our community, especially because they have been particularly successful in making fresh produce available in the lower income urban areas and other places that have been traditionally under served by other forms of retail food outlets. Therefore, we wish to focus our comments on the proposed revisions that address the inclusion of farmers at farmers' markets as eligible vendors.

Despite the vibrancy and pride within the community, Holyoke, by most criteria, is the poorest city in the Commonwealth of Massachusetts with 28.6% of the households in the inner-city earning less than \$15,000. Meanwhile, the fertile farmland of the Connecticut River Valley, within which Holyoke lies, was identified as one of the nation's top 20 agricultural areas most threatened by development (The American Farmland Trust, 1997). However, our organization has been able to help community members start farms through the Tierra de Oportunidades Farm Project, which has allowed us to directly provide high quality and fresh nutritious produce at the

local Farmer's Market for those in need in the same ethnic community as the nearly 3,000 WIC shoppers in Holyoke.

Just as the Holyoke Farmers' Market brought fresh produce to our economically distressed community, the Farmers' Market Nutrition Program has brought more socially and economically disadvantaged families to farmers' markets. Nonetheless, it is critical to keep these resources available and affordable and the new proposed regulation has the power to do just that while having a substantial positive impact on farmers and farmers' markets. With an increase in value of the vouchers to purchase fruits and vegetables, this would not only have a momentous influence in the promotion of healthy eating habits, but it would also bring huge benefits to our new farmer training program and allow for an expansion in capacity to deliver more fresh produce to the community.

In order for WIC recipients to secure as much nutritional value from the use of the proposed fruit and vegetable WIC vouchers at farmer's markets as possible, we offer the following suggestions as you and your team review and finalize these innovative regulations for the WIC program:

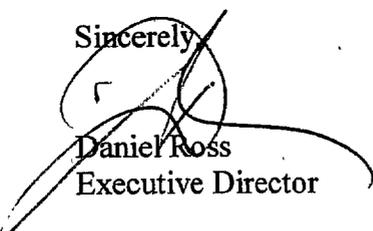
- Consistent with the Institute of Medicine's recommendation, we support their suggested amount of \$10 per month of fruits and vegetables for mothers and \$8 for children between 2 and 5 years, which is an increase from the amount currently proposed in the draft regulations of \$8 monthly for mothers and \$6 for children.
- With respect to vendor specification procedures, farmers' markets should be permitted to participate as seasonal vendors since most markets across the country do not have the capability to operate year-round. Additionally, farmers' markets shall be exempt from the "WIC-only" cost containment requirement and shall not be required to carry a full-range of WIC food package products.
- We ask that substantial efforts should be made to promote coordination between the proposed WIC fruit and vegetable cash voucher program and the existing WIC FMNP. Farmers and farmers' markets that are currently authorized under state WIC FMNP procedures should be automatically eligible for vendor specification under the new fruit and vegetable voucher program. These WIC FMNP authorization procedures should also be applied by states in the future vendor specification process.
- When applicable, states should seek to develop systems for the distribution and use of the new WIC fruit and vegetable cash vouchers that are compatible with existing WIC FMNP procedures. Nutrition education efforts and state and local promotion of fresh fruit and vegetable vouchers should be compatible with and seek to take advantage of existing WIC FMNP education and promotion practices. States shall be required to allow farmers' markets as eligible vendors, provided that they comply with farmer and farmers' market authorization procedures.
- Since farmers' markets carry a vast selection of locally grown fresh fruit and vegetables, state agencies shall not limit the range of fruit and vegetable items that may be purchased with the vouchers. Also, preference shall be given to fresh fruits and vegetables first, then to frozen, and lastly canned.
- There shall be a cost of living adjustment reflected in the value of the vouchers in order to keep pace with inflation.

- State advisory groups should be established to develop the most effective and responsive system possible. Where states and/or municipalities have food policy councils, their participation in the advisory process is strongly encouraged.
- In the event that states adopt EBT technology for the nutrition benefits by WIC recipients, farmers' markets must also be provided with the most practical EBT systems.
- Just as farmers' markets have been pioneers in making the highest quality fruits and vegetables available to people and places that need them the most, I encourage WIC to make these products available in all outlets that serve WIC recipients. In this regard, the national WIC Program should consider implementing pilot projects that test various methods of increasing access to fresh produce, with a variety of retail food outlets including farmers' markets, in areas that are poorly served by such outlets.

We hope you will take this points into consideration when devising the final plan. Thank you again and we commend you and your team for this proposal that moves the nation forward in encouraging higher intakes of fresh produce by making fruits and vegetables a regular part of the WIC food package. This advance in the food package will not only be of immeasurable value for lower income women and children, but it will also assist the nation's family farmers for whom farmers' markets are essential to preserving their livelihoods. We feel that farmers' markets can make a significant contribution to the success of this new initiative, one that promises to provide a healthy tomorrow for all Americans.

We thank you for your hard work on behalf of our country and its citizens and for your consideration of these comments. Please contact me, (413) 535-1789, dross@nuestras-raices.org, with any questions or if I can be of any further assistance.

Sincerely,



Daniel Ross
Executive Director

F 47

SEP 20 2006

Sept 19 06
Ivan & Jean Bader
290 Change Bridge
Pine Brook NJ 07068
973-227-0294

To whom it may concern

How dare you!! As a small

4th Generation Farming family we can not compete with the prices of the large Chain stores. It costs us more to grow our product than the Chain store can sell it for. If qualify;

WIC Participants must like the choice they would not ~ Road stands

Did not understand
me

market.

put the families out
us that

~~2/27/09~~
Carmen
Bader

The Badlers
Ivan & Jean

NOV - 6 2008

F-48

To: Debra Whitford/USDA
From: Gary Troost
Re: Comments on the proposed rule for revisions in WIC food packages

Dear Ms Whitford:

I produce milk on a dairy farm in Stayton, Oregon, writing you in this 11th hour to comment on the WIC proposals as published in the Federal Register Vol.71 Number 151. My product is marketed under cooperative marketing agreement with Northwest Dairymens' Association, within Federal Order 124. Our primary marketing area services Oregon, Washington and adjacent markets of the Pacific Northwest. The comments I wish to convey to you are those of a producer, processor and marketing agent for milk and milk products. They also echo the sentiments of many other family dairyfarmers within the area who are likeminded with that which I will tell you.

Firstly, we greatly appreciate the opportunity to service the needs of WIC participants who qualify as near poverty level. We count that as our benevolence of food to some of those in need and will gladly provide to them without financial profit. The problem of recent times is that the producer is providing milk to the marketplace below their cost of production (approx. 25 cents per gallon) and you are purchasing it for more than you need to pay. A remedy would be for you to buy product directly from us, the producer and processor, FOB plant or delivered to governmental cold storage logistic centers in truckload lots of finished product. We could do this for considerably less than you seem to be paying according to the enclosed USDA retail price report. It is unclear to me exactly how much USDA /WIC compensates the retailer, however it is certain they profit while the producer delivers his product to market below cost of production. We acknowledge the need for various retailers as WIC only stores participation did not fare well in Oregon. It seems WIC customers wanted to buy all food supply at one source. Before moving on, consider USDA being first vendor for our products yet maintaining suitable retail outlets that accommodate WIC participants.

Secondly, family farm producers are moving in the direction of producing "naturally" rather than commercially. Oregon seeks to define "natural" milk to coincide with federal regulation when and if it is ever determined by USDA. We also are informed of food safety being of critical concern and determine to have "certification" of our produce. Certain certification requirements would include NO added growth hormones or rBST be given our cattle, animal grazing be incorporated when available, farm management be family focus rather than corporate based, land stewardship according to state supervised "best management practices".

Technology of the 21st century allows us to offer you the products in the way you desire by enriching and fortifying milk with natural milk product increasing calcium, protein and other vitamins and minerals while maintaining fat standards you desire. Imagine providing children two cups of milk daily instead of three yet maintaining the nutritional value of three at a reduced fat content. It can already be done and I propose you/USDA consider a pilot program in Oregon, using state allocated funding while maintaining cost neutrality and providing the fruits and vegetables as prescribed. As our markets and processors extend into Washington, they may want to join us on a regional basis, however I do not imply to speak for them or their state funding at this time.

Thirdly, consider the nutritional benefit of water for digestion with meals as well as cleansing purposes. The missing third cup of daily milk may remove a beverage during mealtime or lessen the intake of bodily need for water. It seems everyone today either has a cell phone or bottle of water at hand.

Let me show you how the dairy industry can provide water to you for only the cost of the container. We may be able to include it fee free provided our cost of milk production is met.

In conclusion, my comments are timely for WIC consideration but may be applied to any agency or persons who will joint venture with us, dairy producers in Oregon, to supply the needs of our produce from our lands, cattle and milk supply to those most in need.

This is in fact a solicitation or offer to contract with you to supply that need.

You have my permission to forward these comments to who ever may be concerned.

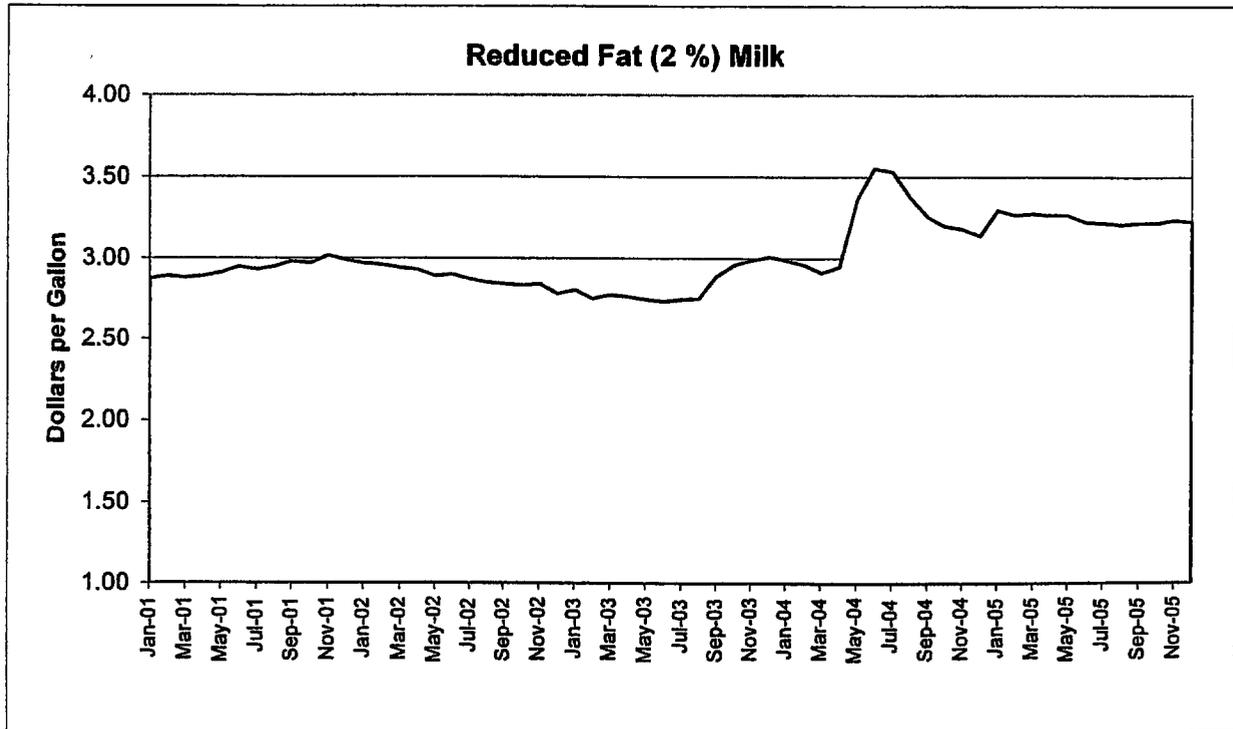
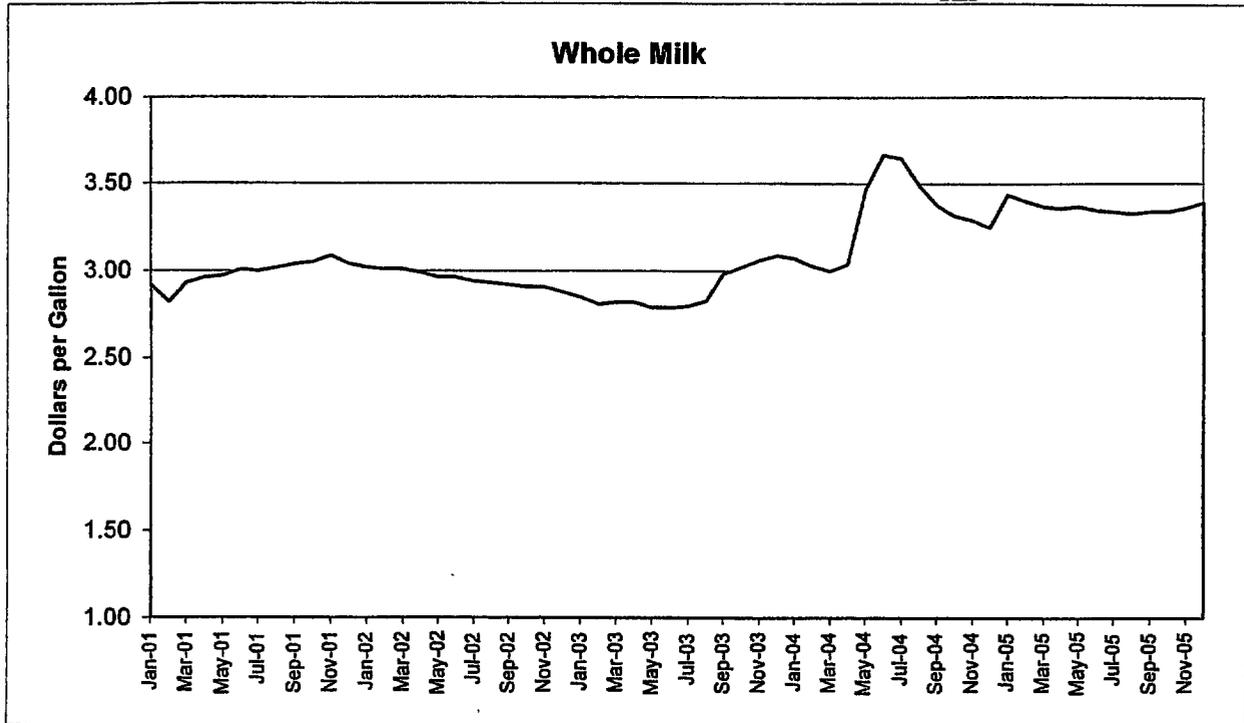
I have never been to your part of this great nation, but I know my way around the west coast and the dairy industry and have fulfilled my promise to many producers and my family in corresponding with you regarding these matters.

Sincerely,



Gary Troost
41175 Cole School Rd.
Stayton, OR 97383
Ph. 503-769-7543

Figure 1: Average Retail Price by Month, 2001-2005



USDA/AMS Dairy Programs
 Retail Prices for Whole Milk and Reduced Fat (2 %) Milk, 2001 - 2005 Summary

F-49

From: KAREN WILK [krwilkk@yahoo.com]
Sent: Thursday, October 19, 2006 12:29 AM
To: WICHQ-WEB
Subject: Docket ID Number 0584-AD77

Docket ID Number 0584-AD77 WIC Food Packages Rules

We are small farmers in NJ who grow our own vegetables & fruit and sell thru our retail market. We are certified farmer vendors for WIC. We do not agree with your proposed change to allow participants to purchase produce at grocery stores, which is where they will buy, with their other groceries. Most of the time, grocery stores do not have local produce or its very limited. The farmers need the support, not the grocery stores.

Ted & Karen Wilk
Little Acres Farm Market
238 Federal City Road
Pennington, NJ 08534

How low will we go? Check out Yahoo! Messenger's low PC-to-Phone call rates.

F-50

From: Betsy [betsycook@comcast.net]
Sent: Sunday, November 05, 2006 9:34 PM
To: WICHQ-WEB
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

To: Patricia N. Daniels, Director

I am emailing my comments regarding the proposed realignment of food packages to allow purchase of fresh produce from supermarkets.

If supermarket participation is allowed in a plan that currently only allows WIC/Seniors FMNP purchases to be made from Certified Farmer Vendors, it will do harm to our network of farmers' markets that we have worked so hard to establish in our area.

The potential loss of business, to supermarkets that consistently overlook and undersell our New Jersey produce, threatens to erase the farm-to-consumer relationships that bring WIC-qualified individuals to a growing number of New Jersey farmers' markets.

Our small state has the advantage of farms growing a short distance from those in need. WIC/FMNP program mutually helps both our local farmers AND the individuals that consume the produce. We can see the positive effects of the existing program in New Jersey.

I urge you to realize that the proposed rule hurts our agricultural community. If you implement such a rule, you are choosing to ignore our region.

Betsy Cook

Betsy Cook
Market Director
Collingswood Farmers' Market
Phone: 856-559-0234
Fax: 609-482-8017

COLLINGSWOOD FARMERS' MARKET
EVERY SATURDAY 8am-noon, May thru Thanksgiving
Between Collings and Irvin Aves. along PATCO
Directions and info: www.CollingswoodMarket.com
A project of the Borough of Collingswood

F-52

From: Claremontmarket@aol.com
Sent: Sunday, November 05, 2006 5:08 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

As small, certified organic growers, we would love to see the WIC program extended to enable more needy families to shop at Farmers' Markets throughout the country.

Liza Draper
Four Meadows Farm
504 Winter Street
Claremont, NH 03753
603-542-8687 phone
603-542-3050 fax
lizadrap@aol.com

Claremont Farmers' Market
Thursday afternoons, June - October in Broad Street Park
RAIN OR SHINE
Bread/Baked Goods; Dairy; Eggs; Farm-Fresh Produce; Flowers; Fudge; Herbs; Honey;
Maple Syrup; Meat and Other Specialty Products
For information on vending, performing or volunteering, please call (603) 542-8687; fax
(603) 542-3050; email ClaremontMarket@aol.com or visit us online at
www.claremontmarket.org

F-53

email to wichq-sfpd 11-06-06 from dgragan@peoplepc.com

**D & S Farm
38845 Mount Wolf Road
Charlotte Hall, Maryland 20622
301-290-1179**

November 6, 2006

SENT VIA e-mail: WICHQ-SFPD@usda.gov

Patricia N. Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Services
US Department of Agriculture

Dear Ms. Daniels:

The following comments are provided to you in response to Docket ID # 0584-AD77 WIC Food Packages Rule. I respectfully request that they be made a part of the public record on this rulemaking and be considered in the review of these proposed regulations.

Thank you.

Sincerely,

Susan Loomis Gragan
D & S Farm

COMMENTS RE DOCKET ID#0584-AD77, WIC FOOD PACKAGES RULE

My husband and I are the owners of D & S Farm, a small orchard and farm operation in Charlotte Hall, Maryland. The proposed change to the USDA WIC program (*ID #0584-AD77, WIC Food Packages Rule*) has the potential to seriously impair income to those thousands of small family farmers, as are we, who sell their fresh produce directly to consumers through farmers markets. It also serves to circumvent the goal of providing fresh fruits and vegetables to the recipients.

LOCALLY GROWN PRODUCE IS MORE NUTRITIOUS

Sales of fresh fruits and vegetables, locally grown, are generally presented to consumers within 24-36 hours of harvest. This means that the product is at its most nutritious, not having spent days, or weeks in transit and cold storage. At the Mid-Atlantic Fruit & Vegetable meeting held in January 2006, one of the speakers presented the timeframe for peaches brought into the country from South America in the off-season – winter. It takes approximately 2-3 weeks from day of harvest to appearance of the produce at a supermarket. From the moment produce is harvested, it begins to lose its nutritional value and its flavor.

Peaches, for example, become mealy if kept in cold storage for several weeks, an unfortunate experience and waste of money for many consumers buying off-season produce. Peaches being shipped some distance to markets are routinely picked green, before ripe, as these hard peaches are less likely to bruise during shipping. This is true for peaches being shipped from outside the country as well as for domestic peaches being shipped across the country to accommodate retail grocery market demands for out of season fruit. The same is often the case for strawberries shipped long distances, domestically or internationally. This results in customers buying strawberries being white and not red and ripe on the inside. Fruit that is harvested before ripe does not contain its full nutritional benefits.

The goal of providing the most nutritious products for the WIC program participants is best met by assuring that the products are ripe and as fresh as possible. This goal is betrayed, and nutritional benefits shortchanged, with the proposed rulemaking.

FARMERS' MARKET WIC PROGRAM IS IMPORTANT TO SUCCESS OF SMALL FARMS

Those of us who are small farmers rely on direct sales of our product to the customers. We have established that this is the most effective way to market our product and receive income sufficient to continue farming. Farmers markets are that best methodology, and the existing WIC program is an integral part of that. We can sell our product at farmers markets at costs equivalent to or less than grocery stores, and make income sufficient to continue farming, as the middleman's cut has been eliminated.

We are a small family operation in Southern Maryland, raising peaches, raspberries, strawberries, blackberries, currants, blueberries, nectarines, plums, cherries, apples, a range of salad greens, tomatoes, squash and peppers. Our marketing is 95% through

farmers markets in the greater Washington, D.C. area. We are certified in the WIC program in Maryland, Virginia and Washington, D.C. Only one of our 10 farmers markets is not a WIC eligible market.

A review of WIC receipts for just this year indicates that the WIC vouchers account for 5% to as much as 60% of the sales at these markets. This is approximately 15% of our total sales of fresh produce at WIC eligible farmers markets. This is a significant amount for a small operation, and the difference between earning sufficient income through farming or having to find other employment in the off-season. One of our markets is located in a significantly low-income area of Southeast Washington, D.C. that has only one major grocery store. Up to 60% of the sales in that market is generated through the WIC program. Without those sales, that market would not provide enough sales to warrant our continuance in that market. The residents of this community deserve fresh, in season, high quality fruit and vegetables as much as residents in the high income areas of Washington, D.C. Additionally, with the discussion taking place with customers, we provide information to them about how to prepare the various items they may not be familiar with, a service not available at grocery stores.

FOOD EDUCATIONAL AND NUTRITIONAL INFORMATION EXCHANGE WITH WIC PARTICIPANTS WILL BE LOST

Utilizing the WIC check program in retail establishments will not be as simple as the current retail/grocery store program for the non-fruit and vegetable items. Most fruits and vegetables are not conveniently packaged in \$3.00 or \$5.00 amounts and most are sold by the pound. Most people prefer to select fruits and vegetables individually, rather than in pre-packaged amounts. A typical purchase by a WIC participant might include, for example, three or four tomatoes, some peaches and several green or yellow squash, all of which sell for a different per pound price. Meeting a precise dollar amount is not simple or easy.

A typical scenario involving the use of the WIC checks for fruits and vegetables can involve some or all of the following:

- Many of the customers speak little or no English, requiring patience and a willingness to work through the communication barrier toward understanding of the program and selection of product. We have WIC customers who speak Spanish, Chinese, Korean, Vietnamese, various African languages, and various Arabic languages.
- Consider the situation when a recipient goes through the grocery checkout line with a quantity of fruit and vegetables which does not "hit" the exact dollar amount of the WIC check(s). Since most fruit and vegetables are sold by the pound and not in precise pre-packaged amounts, this will happen. It happens at farmers markets, but we have the flexibility to be able to work with the recipients to allow full utilization of the value of the WIC checks. Often, when the pending purchase is a little above the total of the check or checks, we absorb the difference so the customer is able to purchase what they need and not feel the necessity of trading items back and forth to reach the exact number. I don't believe this courtesy or accommodation will occur at retail grocery store checkout lines.

- There are WIC participants with limited knowledge of many fruits and vegetables and how to prepare them. We provide information to these customers, explaining for instance, how to prepare winter squash or the taste qualities of various lesser-known salad greens. We also are able to provide information on various items to foreign-born customers who are not familiar with some of the fruits and vegetables grown in this country. This educational and informational service cannot be expected to occur in a grocery store checkout line.

To assume, or believe, that WIC participants will continue to utilize WIC checks with farmers markets when they have checks to be redeemed at grocery stores for the same products is unrealistic at best. Convenience, and not freshness and nutritional value, will be the main factor in use of the checks. The personalized service, the educational and informational service and the flexibility shown by many farmers in working with WIC participants will be lost, and the WIC participants and their children will be hurt the most from that loss.

Another point of information...farmers markets in many parts of the country routinely run year-round, with local winter root vegetable and local greenhouse grown products available in cooler climates and a wide range of produce available in the warmer areas of the country. In the Washington, D.C. metropolitan area there are at least three significant farmers markets open year-round featuring local produce. These are in Arlington, Virginia, Takoma Park, Maryland and Dupont Circle area of Washington, D.C. Winter produce at these markets includes greenhouse-grown greens, salad mixes, and tomatoes, and winter root vegetables, as examples. Rather than authorizing use of the WIC checks for fruits and vegetables at grocery stores in winter, the agency should consider a rule-making change allowing the farmers markets checks be eligible at farmers markets year round as the individual states deem appropriate.

I appreciate this opportunity to comment on the proposed rulemaking. I urge that this rulemaking **not** go forward as its implementation will seriously harm what has been a most workable and successful program providing benefits to the women, infants and children of the WIC program and to thousands of small farmers.

Sincerely,

Susan Loomis Gragan
D & S Farm



New York Farm Bureau Inc.
PO Box 5330 159 Wolf Road
Albany, New York 12205
Phone # 518-436-8495
Fax # 518-431-5656

F-54
emas

November 6, 2006

Patricia N. Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
USDA

Director Daniels:

New York Farm Bureau (NYFB) appreciates the opportunity to submit comments to the USDA regarding the proposed rule to update food packages for the Women, Infants and Children (WIC) supplemental nutrition program. WIC currently serves about 8 million women, infants and children up to age 5 who are nutritionally at risk by providing them with nutritious foods to supplement their diets, nutrition education and health care referrals.

NYFB producers and farmers have been supportive of the WIC program and applaud its goals of providing nutritious foods and nutrition education to eligible participants in New York State. We remain committed as producers of locally grown, nutritious and healthy foods to supply products that are, and should remain the mainstay of the WIC program. Dairy products as well as fruits, vegetables, and eggs have provided the basis for the WIC program over the history of the program.

The proposed rule indicates that the new WIC packages will:

- Provide greater consistency with the Dietary Guidelines for Americans (DGA).
- Support improved nutrient intakes.
- Provide greater consistency with established dietary recommendations for infants and children under age two.
- Address emerging public health issues such as overweight and obesity.
- Reinforce the nutrition education messages provided to participants.
- Provide wide appeal to diverse populations.

NYFB agrees that the WIC guidelines should be reviewed periodically, and address current and changing nutritional guidelines. However, in the process, it is important to maintain key successful nutritional packages. The reduction of milk, and substitution of portions of milk and dairy with soy or tofu could lead to lowered intake of key nutritional components by WIC participants.

Generally, NYFB is very concerned about nutritional outcomes resulting from proposed reductions of both fluid milk and dairy products in certain food packages. We are concerned that a recommendation of the National Academies' Institute of Medicine (IOM) to partially substitute yogurt for milk in certain food packages was not accepted. We are very concerned that the USDA has included the use of soy and tofu as substitution products for natural dairy products. The USDA's proposed changes would limit WIC participants' dairy choices, favor soy products over dairy products in some cases, and reject the IOM's recommendation to add yogurt to the WIC package.

NYFB recommends a number of changes to the proposed WIC food packages as included by the USDA in the proposed rule as follows:

Fluid Milk Reduction

The proposed rule would reduce the fluid milk allocation in the children's package IV, ages 1-5, from 24 to 16 quarts per month. Reductions would vary in the three packages for women, falling from 24 to 16 quarts/month for postpartum, non-breastfeeding women; from 28 to 22 quarts/month for pregnant and partially breastfeeding women; and from 28 to 24 quarts/month for fully breastfeeding women.

NYFB feels that the proposed reduction of fluid milk in food packages is not warranted. The U.S. Dietary Guidelines for Americans (DGA) describes milk and milk products as a major source of dietary calcium and other nutrients, such as potassium. The nutritional content of milk plays an important role in the normal development of children. Milk contains nine essential nutrients, including calcium, phosphorus, potassium, protein and vitamins A, D, B12, riboflavin, and niacin. The DGA does not limit dairy recommendations to children and adolescents; milk and milk products are a core component of a healthy diet for all Americans.

The IOM report indicates the highest priority nutrients to increase in the diets of women of reproductive age include calcium, magnesium, and potassium. Other priority nutrients targeted for increased intake include vitamin A and vitamin D. Milk contains all these nutrients, and the 2005 DGA increased milk servings based on milk as an important contributor of potassium.

The IOM recommendation to reduce milk servings in the food package for children ages 1-5 was made despite the IOM noting a concern that intakes of milk and milk products are lower than recommended on average for children ages 2 through 4 and women in the childbearing years.

NYFB recommends that the proposed fluid milk reductions in the children's package IV, and the Women Food Packages V, VI, and VII be removed, and milk allowance levels revert to the levels currently included in the WIC program.

Soy Beverages and Tofu as Milk Substitutes

The proposed rule would permit the substitution of soy-based beverage and calcium-set tofu as substitutes for milk in the women's food packages, and in children's package with proper medical documentation (lactose intolerance). The USDA highlights the importance of milk in the diets of children, especially for bone health, allowing soy beverage only with a documented medical need. By requiring medical documentation, USDA acknowledges that soy beverage is not equivalent nutritionally.

NYFB is concerned that acceptance of soy and tofu products has not been demonstrated in the targeted WIC population. Lower intake of key nutrients by poor acceptance of the replacement substitution products (soy and tofu) could lead to higher consumption of non-WIC foods of low nutrient density. Many low nutrient density foods increase the probability of

overweight and obesity. This possible scenario would counter the WIC stated new package result of "address emerging public health issues such as overweight and obesity."

NYFB recommends the proposed rule be modified to remove the use of soy beverage and calcium-set tofu as dairy substitutes in the women's food program, except in the case of lactose intolerance. In that case, NYFB recommends that yogurt and lactose free milk be included as allowable substitutes of choice.

NYFB recommends for the children IV program, permit the substitution of yogurt as an allowable substitute, and encourage the use of lactose free milk rather than soy based beverages in the case of lactose intolerant participants.

Inclusion of Yogurt as Allowable Substitute for Milk

The USDA has not included yogurt as an allowable substitute for milk in the proposed rule, but rather has chosen to allow soy beverages and tofu. Yogurt is an appealing, highly nutritious food enjoyed by women and children, that is often well-tolerated by those who have trouble digesting lactose.

The USDA did not follow the IOM's recommended inclusion of yogurt as a substitute for milk based on high acceptability across cultural populations served by the WIC program. Providing yogurt as a substitute for milk would increase WIC participants' access to a nutrient dense food that contains calcium, potassium, and often vitamin D--nutrients that are low in the diets of women and or children.

The USDA's choice to include soy as a recommended substitute but not yogurt, the other recommended IOM substitute, limits the potential success of WIC's objectives. The USDA's decision to reject yogurt as a substitute for milk in the food packages of women and children cannot be supported or defended on nutrition grounds, nor can it be defended based on meeting culturally needs and preferences.

NYFB highly recommends that the USDA permit the use of yogurt as an allowable substitution for milk in the WIC program, and restrict the use of tofu and soy unless lactose intolerance. We recommend the use of lactose-free milk and yogurt in cases of lactose intolerant WIC participants.

NYFB appreciates the opportunity to submit the above comments regarding the WIC Food Packages. Please let us know if you have any questions, or wish to discuss any of our comments.

Sincerely,

John Lincoln, President New York Farm Bureau

Robert Hokanson, Associate Director Public Policy

F-55

From: Sara Coblyn Porth [sara.porth@uvm.edu]
Sent: Monday, November 06, 2006 10:12 AM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule
To Whom It May Concern:

We are writing to express our concern regarding proposed changes to the USDA WIC program that will make it harder for WIC recipients to use their coupons at local farmers' markets. We run a vegetable farm in Massachusetts and have worked on other farms for years that have made their produce available to low income consumers. The WIC coupon program has been the simplest way to make that connection. As farmers, we appreciate being able to experience the educational aspect of our business when we make suggestions to customers using WIC coupons on how to cook with our produce. We feel good to be able to support these families with our produce. We also rely on these coupons as a portion of our income as do many farmers in New England and around the country. This is and has always been a win-win situation that supports two populations of people struggling to survive in an increasingly globalized world; the low-income consumer and the small, family farmer.

We ask that you:

- a.. Do NOT reduce FMNP funding or establish procedures that would adversely affect its operation or effectiveness.
- b.. SUPPORT the proposed regulations, especially the provision that makes farmers' markets eligible WIC vendors.
- c.. ENABLE FARMERS' MARKETS to be allowed to participate in the WIC program as seasonal vendors, to be exempt from the WIC-only cost containment requirements, and not be required to carry a full-range of WIC food package products.
- d.. Do NOT place a limit on the type of fresh fruits and vegetables that may be purchased with the new coupons.

Instead of eliminating this important program, let's decide to improve it. Let's increase the educational outreach to customers so that they know where their local farmers' markets are, how to get to them and what to buy when they get there. Let's be creative about transportation options and outreach materials. Let's make real, positive changes instead of eliminating a program that creates relationships between low income consumers and family farmers, that creates healthier communities and that educates the children of these consumers to give back to their local community by purchasing fresh, local fruits and vegetables.

Thank you for your consideration in saving this vital program.

Sincerely,

Sara and Gideon Porth
Atlas Farm

South Deerfield, MA
sara.porth@uvm.edu
www.atlasfarm.com

certified organic produce



**Michigan Food &
Farming Systems-MIFFS**
Bringing Farmers & Communities Together

Handwritten:
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F-56
email

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East Lansing, MI 48824
Tel: 517-432-0712
Fax: 517-353-7961
www.miffs.org

[email to wichq-sfpd received 11-06-06, from
Dru Montri
Michigan Farmers' Market Association
Program Manager
416 Agriculture Hall
East Lansing, MI 48824

Office: 517-432-0712
Mobile: 517-599-0036
Fax: 517.353.7961

November 6, 2006

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, Virginia 22303

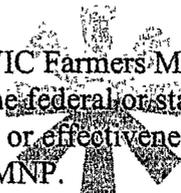
REF Docket ID Number 0584-AD77-WIC Food Package Rule

Dear Ms. Daniels:

We are writing this letter on behalf of the Michigan Farmers' Market Association and its host entity, Michigan Food and Farming Systems, in support of the revisions in the WIC food package as proposed by the USDA. Our statewide association represents farmers, farmers' markets, neighborhood centers, municipalities, downtown development authorities, foundations, nonprofit organizations and state entities. The proposed regulations are exciting news for those of us involved in local food and farmers' market related work!

Since our efforts deal directly with farmers' markets, our comments focus on the proposed revisions that address the inclusion of farmers' markets as eligible vendors. In order for WIC recipients to secure as much nutritional value as possible from the use of the proposed fruit and vegetables WIC vouchers at farmers' markets, we offer the following comments regarding the WIC Food Package regulations:

- The USDA should not reduce current funding levels for the WIC Farmers Market Nutrition Program (FMNP) or establish procedures at either the federal or state levels that would adversely affect the WIC FMNP's operation or effectiveness. Instead, we strongly support funding increases for the WIC FMNP.





**Michigan Food &
Farming Systems-MIFFS**
Bringing Farmers & Communities Together

416 Agriculture Hall
East Lansing, MI 48824
Tel: 517-432-0712
Fax: 517-353-7961
www.miffs.org

- The WIC FMNP and the proposed WIC fruit and vegetable voucher program should be coordinated.
- Farmers or farmers' markets that are already authorized under state WIC FMNP procedures should be automatically eligible for vendor specification under the proposed fruit and vegetable voucher program.

- States should be required to allow farmers' markets to be eligible vendors for fresh fruits and vegetables if they comply with farmers' and farmers' market authorization procedures.
- Farmers and farmers' markets currently authorized under state WIC FMNP procedures should be automatically eligible to be WIC vendors for the proposed fruit and vegetable vouchers.
- Farmers' markets should be allowed to participate as seasonal vendors since the majority of farmers' markets in the United States do not operate year round.
- No limit should be placed on the type of fresh fruits and vegetables that may be purchased with the proposed fruit and vegetable coupons.
- Farmers' markets should be exempt from the WIC-only cost containment requirement and not required to carry a full-range of WIC food package products.
- When practical, states should seek to develop systems of distribution and use of the proposed fruit and vegetable vouchers that are compatible with current WIC FMNP procedures.
- If states adopt EBT technology for WIC benefits, farmers' markets should be provided with the most practical EBT systems for the redemption process.

On behalf of the Michigan Farmers' Market Association and the more than 150 farmers' markets in Michigan, thank you for the opportunity to express our support for the revisions in the WIC food packages as proposed by the USDA. Above all, we enthusiastically support the provision that makes farmers' markets eligible WIC vendors.

The addition of fruits and vegetables as a regular part of the WIC food package will not only enhance the diets of low income families and children, but will assist the farmers for whom farmers' markets are an essential part of their livelihoods.

Sincerely,

Elaine Brown
Michigan Food and Farming Systems
Executive Director

Dru Montri
Michigan Farmers' Market Association
Project Manager





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Farming Systems-MIFFS**
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Council of
Northeast
Farmer
Cooperatives

Agri-Mark, Inc.
Dairy Lea Cooperative, Inc.
Dairy Farmers of America
St. Albans Cooperative Creamery
Upstate Farms Cooperative, Inc.

P. O. Box 151240
Alexandria, VA 22315
tel: 703 751 0204
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Robert J. Gray, Executive Director

November 6, 2006

F-57
email

Ms. Patricia N. Daniels
Director, Supplemental Food Programs Division
Food & Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive
Room 528
Alexandria, Virginia 22302

Dear Ms. Daniels:

The Council of Northeast Farmer Cooperatives (CNFC) would like to submit the following comments on USDA's Food & Nutrition Service's proposed rule to revise the regulations governing the Women, Infants and Children (WIC) food packages (Federal Register: August 7, 2006; 7CFR Part 246).

CNFC represents five major dairy cooperatives in the northeast region with over 11,000 dairy producers. Membership in CNFC includes Agri-mark, Inc.; Dairy Lea Cooperative, Inc.; Dairy Farmers of America (Northeast Council); St. Albans Cooperative Creamery and Upstate Farms Cooperative, Inc. Together these cooperatives produce a major portion of the dairy products consumed in the northeast.

It is our understanding that the proposed rule is to update the current WIC food package by adding fruits and vegetables for WIC participants six months of age and older, eliminate juice from infant's food packages and add whole grains to food packages for children and women. In addition, it would add infant food meat for fully breast-fed infants six through eleven months of age.

Since its inception, WIC has been a critical food assistance program with nearly half of the infants born in the U.S. each year as beneficiaries. With a \$5 billion budget and eight million participants in the program it has provided much needed nutritional balance to diets of many Americans. Dairy products have always been a major part of the WIC program. Almost 30%, or \$1.4 billion of WIC's annual expenditures, go toward the purchase of dairy products for its participants.

Our concern with the proposed rule are two-fold. First, they would significantly reduce the level of dairy products currently available to WIC participants. Secondly, the nutritional value of a number of substitute food items in the rule do not measure up in our opinion to the unique qualities of nutritional benefits provided by dairy products.

- Reduction in dairy products in the WIC program: If the rules as proposed are implemented, fluid milk sales to the program would fall by 23%. For cheese, it is estimated that the decline in sales would be 35% or 40 million pounds. The total value of the loss in sales of dairy products would be about \$400 million or 29% of current WIC annual expenditures on dairy products. These reductions in the use of dairy products will clearly affect both the short and long term nutritional benefits of WIC in a negative way.
- The nutritional value of a number of substitute food items in the rule are of lesser quality. Items such as soy beverage as a substitute for milk in WIC packages for women does not meet the test of improving the nutritional intake of WIC recipients nor do items such as tofu replace the critical ingredients found in dairy products.
- In 1999 WIC initiated the "FitWIC" program to combat the growing national problem of obesity in children and adults. It made USDA a leader in the fight against obesity. And calcium intake is one of the prime combatants to obesity.

More than two decades ago the first federally supported National Health and Nutrition Examination Survey found a significant association between low intake of calcium and being overweight. Subsequent studies have more than verified those findings which clearly link low calcium consumption with excess body weight and excessive weight gain, two conditions that lead to many other health problems and that can shorten life. Dairy foods supply 72% of the calcium in the nation's food supply. In addition the findings of a number of other studies at Purdue University and the University of Colorado demonstrated that high intakes of calcium in non-obese adults were associated with higher rates of fat oxidation. A number of other studies have shown that additional bio-active compounds in dairy products act synergistically with calcium to reduce the risk of obesity.

The obesity fighting qualities of milk are now very well documented. Dairy products also supply potassium which has been identified as low in WIC participants diets. It is an excellent source of Vitamin D, protein, Vitamin A and B12 as well as a rich source of a number of other vitamins and minerals.

As stated earlier some of the substituted food items do not measure up nutritionally to dairy products. Although the Institute of Medicine which evaluated the WIC program recommended yogurt for women, it was not included as part of the substitute food items in the proposed rule. And at the same time lactose reduced or lactose free dairy products are not fully considered in the rule.

CNFC would recommend that the Food & Nutrition Service strongly reconsider its reductions in milk and other dairy products in its food package and include other items such as yogurt and consider making lactose reduced or lactose free milk available for those participants who have trouble digesting lactose. And lastly, more cheese product substitution would give WIC participants a wider range of choices.

We very much appreciate the opportunity to comment on these proposed rules and will be glad to answer any questions that you have.

Sincerely,

Robert J. Gray
Executive Director
Council of Northeast Farmer Cooperatives

Groundwork LAWRENCE

60 Island Street
Lawrence, MA 01840

978-974-0770 phone 978-974-0882 fax
www.groundworklawrence.org

November 6, 2006

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, Virginia 22303

F-58

Re: **REF Docket ID Number 0584-AD77-WIC Food Package Rule**

Dear Ms. Daniels:

As manager of the Lawrence Farmers Market, Groundwork Lawrence is providing this letter to express organizational support for the proposed changes to the WIC food package. Given the overwhelming evidence that vegetables and fruit play an extremely important role in providing much-needed nutrients to the human diet, combined with historical trends of low-income families most often lacking access to fresh foods and most acutely suffering higher rates of diet-related illness, *increasing WIC recipients' access to fruits and vegetables through USDA's proposed policy changes will stand to increase not only access to fresh foods in low-income communities like Lawrence, but also the health of our communities in general.*

However, despite our support for the proposed changes, we believe *the proposed legislation does not go far enough in supporting the most nutritious and beneficial food options for WIC participants and communities in general.* Allowing these extra WIC "dollars" be used at supermarkets to buy frozen and canned fruits and vegetables does not encourage WIC participants to consume the most nutrient-dense foods. Numerous studies have demonstrated that locally-grown food consumed soon after harvest provides the most nutritional value of any fruit or vegetable on the market. As manager of a community-based farmers' market, we are deeply committed to increasing the consumption of locally-grown, highly nutritious produce, especially among WIC recipients, who number in the thousands in our community.

Finally, in addition to improving the health of WIC recipients, we feel strongly that *the proposed policy changes could do more to strengthen local economies by encouraging WIC recipients to shop at local farmers' markets.* With over \$31,000 in WIC coupons redeemed at the Lawrence Farmers Market in 2005, over 85% of sales at the Lawrence Farmers' Market derive from WIC coupon sales. Because there is a strong, local consumer base who rely on the local marketplace for fresh, locally-grown produce, connecting the proposed extra WIC "dollars" to current WIC recipient farmers' market coupons would likely bring more WIC recipients to the local farmers' marketplace, thereby sustaining regional farmers' role in the health of our regional economy, as well as the health of residents in our community.

I thank you for your solicitation of commentary on the proposed Food Package changes to the WIC program, and hope to see more food-related policies that support increased access to fresh food, improved public health, vibrant farmers' markets, and stronger local economies.

Sincerely,

Kate Gormly

Deputy Director



F-61

From: Taunya Otten [ottens@gtelco.net]
Sent: Thursday, October 26, 2006 3:29 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

Are you CRAZY?! American women and children are already suffering from a calcium deficiency and now WIC is decreasing the amount of milk available to them. I feel that getting calcium into a child's diet is more important than measuring the amount of fat and cholesterol that they eat. Please do not take milk out of the diets of these at-risk children. Consider a yogurt substitution as well as the cheese substitution for milk.

Taunya Otten
One of America's Dairy Farmers

F-62

From: Bill Webb [bill@anchoragemarkets.com]
Sent: Monday, October 30, 2006 12:02 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

We operate Farmers' Markets for 3 days per week for 18-20 weeks each year in Anchorage, AK. We very much support the inclusion of fruits and vegetables in the WIC program so long as the Farmers' Market program continues to ensure the "Eat Local" theme remains and important part of the program.

Thank you for this opportunity to make our feelings known.

Sincerely yours,

Bill Webb
Anchorage Market & Festival and Northway Mall Wednesday Market

272-5634

F-63

From: Phoebe Bitler [vgf@early.com]
Sent: Monday, October 30, 2006 11:42 AM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

To Whom It May Concern,

I am a dairy producer from southeastern Pennsylvania, and we market the milk from our 100 dairy cows thru Land O' Lakes. It has come to our attention that the US Dept. of Agriculture is considering changing the mix of foods allowed in the WIC package, and we would like to urge you to increase the amounts of milk and dairy products in the mix rather than decrease it. Milk and its products offer a unique nutrient package that is not easily available in other foods. The 2005 Dietary Guidelines for Americans recommended that most people should increase their intake of low-fat/non-fat dairy foods rather than decrease them. As a home economist as well as a dairy producer, I believe it behooves USDA to continue supporting the dairy industry in WIC for the health of consumers. There are many low/non fat options in dairy available that would enhance our citizen's health rather than damage it with the substitution of other less nutritious food products.

Thank you for your time. If I can be of further assistance, please feel free to ask.

Phoebe Bitler
Vista Grande Farm
Fleetwood, PA

Phoebe Bitler
vgf@early.com

F-64

From: WebMaster@fns.usda.gov
Sent: Monday, October 30, 2006 8:09 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Tom Dierolf
EMAIL: tsdierolf@yahoo.com
CITY: Brevard
STATE: NC
ORGANIZATION: Cornercopia Farm
CATEGORY: Farmer or Farmers Market
OtherCategory:
Date: October 30, 2006
Time: 08:09:06 PM

COMMENTS:

I fully support these changes. As part of building local foods systems that strengthen local economies and rural communities, all efforts must be made to ensure that families with minimal disposable income can also benefit from local food systems.

F-65

From: WebMaster@fns.usda.gov
Sent: Monday, October 30, 2006 1:07 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Lori Anne Lau
EMAIL: laufarm@silverstar.com
CITY: Soda Springs
STATE: ID
ORGANIZATION:
CATEGORY: WICParticipant/Recipient
OtherCategory:
Date: October 30, 2006
Time: 01:06:47 PM

COMMENTS:

My youngest child just turned 5 so I no longer recieve WIC benefits. After 5 yrs in the program, I am thrilled that the program may allow recipients the ability to choose fresh fruits and veggies. I frequently did not purchase all of the juice allowed because I felt it was much better to feed my children and myself fresh/canned or even frozen fruits and veggies and milk and water to drink than juice. It is my understanding that juice has been implicated in the current childhood obesity issues-babies getting juice and then graduating to soda instead of basic water and milk.

I am also a rancher participating in the farmers market route of selling our products. While I myself whould not benefit from WIC participants being able to purchase fruits and veggies I can clearly see a strong benefit to my fellow vendors and to the market as a whole. We would love to attract more low income customers (often those who most need the fresh wholesome products available at market) to the markets we attend in both UT and ID. I am encouraging the boards of both markets to determine if we could take food stamp benefits. An expansion of WIC benefits to fresh fruits and veggies would also encourage these customers to come to our markets.

There are a number of program details to be figured out, but there are already farmers markets taking WIC benefits, so their example could be followed. As a former participant and as a farmer/rancher I would love to see more fresh fruit and veggies allowed and a reduction in the juice ration.



IF the program could be expanded to cover meat purchases (in Idaho nursing women get Tuna only) I'd be able to benefit directly in the form of more sales of our natural and grass-fed meats.

Thanks you for reading my comments,

Lori Anne Lau, Lau Family Farm, LLC



F-67

From: Tamara Rovey [tamarahelen@cox.net]
Sent: Monday, October 30, 2006 11:21 PM
To: WICHQ-SFPD
Subject: Comment on proposed changes for WIC

Dear Ms. Daniels:

I am a dairy farmer in Arizona, and I am concerned about the proposed changes in the Food Packages for Women, Infants and Children.

I am proud to produce a product that is so nutrient rich, so vital to good health and strong bones, and which can also aid in weight loss.

It's my understanding that the changes recommended by USDA would reduce the access of WIC participants to dairy products. I believe that some modifications in those proposed changes could better address some of the concerns (about lactose intolerance, for example), and provide better nutrition through more options for dairy products.

Specifically, my comments are these:

1. Allow more cheese substitutes for milk. This is a great source of both calcium and protein, and fits well into many cultural and dietary patterns.
2. Make lactose-free or reduced-lactose milk the preferred substitutes for milk. This would be consistent with the Dietary Guidelines for Americans, and would provide a better nutritional package than soy for those who are lactose sensitive.
3. Add yogurt as a substitute for milk. The Institute of Medicine recommends this as another alternative for those who are lactose sensitive, and yogurt also fits into a variety of food patterns.
4. Allow ALL women, including those who are not breastfeeding, to receive three servings of milk, per day. This would improve the nutritional grounding for the mothers, and provide a model of healthy eating for their children.

Thank you for the opportunity to comment on the proposed changes.

Sincerely,

Tamara Rovey

Thanks

Rovey
7711 W. Northern Ave.
Glendale, AZ 85303
Office 623-939-2045

-----HP750

F-68

From: JOSEPH SIGNORELLO [sigjam@verizon.net]
Sent: Monday, October 30, 2006 8:59 AM
To: WICHQ-WEB
Subject: docket id #0584-AD77 WIC Food Packages Rule

Dear Ms. Daniels,

I'm the Farmers' Market Mgr. for Roselle Park, NJ. I have worked as the market manager for the Borough of Roselle Park for the past ten years. I am writing to you today because I am concerned about changing the WICFMNP participants choice to include produce at supermarkets.

I can tell you from my experience, a large volume of business for our market comes from WICFMNP participants.

Our town is a diverse income town, with a downtown that is in need of revitalization. Our market is a key part of our downtown revitalization. If the farmers do not continue to profit, we will no longer have a farmers' market.

The Roselle Park Farmers' market not only attracts consumers from Roselle Park but surrounding towns as well. Towns such as Elizabeth, Roselle, & Union rely on getting "Jersey Fresh" products.

Please consider the fate of all our famers' markets in NJ before making your determination. Supermarkets are large volume mass marketers, they have a lot of money & customers to sustain themselves. It is far too often the "small" business gets choked out of competition.

If you should have any questions or would like to contact me directly you can reach me at (908)245-6441. Thank you for your consideration in this very important matter.

Antonette Signorello
Roselle Park Market Mgr.

F-69

From: no-reply@erulemaking.net
Sent: Thursday, November 02, 2006 5:49 PM
To: CNDPROPOSAL
Subject: Public Submission

Please Do Not Reply This Email.

Public Comments on Special Supplemental Nutrition Program for Women, Infants and Children (WIC): Revisions in the WIC Food Packages:=====

Title: Special Supplemental Nutrition Program for Women, Infants and Children (WIC):
Revisions in the WIC Food Packages FR Document Number: 06-06627 Legacy
Document ID:
RIN: 0584-AD77
Publish Date: 08/07/2006 00:00:00
Submitter Info:

First Name: Colin
Last Name: Egan
Mailing Address: 54 Journal Square
City: Jersey City
Country: United States
State or Province: NJ
Postal Code: 07306
Organization Name: Farmers Market at Journal Square

Comment Info: =====

General Comment: November 2, 2006

I founded the Farmers Market at Journal Square in Jersey City, New Jersey in 1995, and have overseen its operation for nine of its twelve seasons. My Market is one of the highest volume farmers markets in New Jersey, and is patronized by a wide strata of area residents, from commuters to area shoppers and workers to nearby residents to mothers and seniors who come from throughout Hudson County and beyond.

But let there be no doubt ? the loss of regular and senior WIC customers will be a severe economic blow to the Farmers Market at Journal Square, and it will destroy many other markets that do not have as wide a base as we do. This devastation will certainly be the case not only in New Jersey, but across the country where farmers markets have, in the last decade, proliferated as valued sources of fresh produce, urban amenities and added income for America's family farmers.

Any suggestion that the change will not necessarily diminish WIC customers at farmers markets defies logic ? since WIC recipients who do other shopping at supermarkets will naturally tend to use their fresh produce allotment at those stores as well.

But this slight increase in convenience to WIC recipients cannot be justified against the harm it will due to the goals of the Department of Agriculture and to the national good as a whole.

For one thing, the quality of fresh produce available to WIC recipients at a supermarket is simply not comparable to that of the fruits and vegetables at any farmers market. This difference in quality and nutrition is so significant that it more than justifies the somewhat more limited (though hardly onerous) access.

In addition to quality, there is another important benefit which WIC recipients now receive by shopping at farmers markets that they would lose if the proposed changes are enacted: By having the chance to talk with farmers, WIC recipients at my Market -- and most markets, I?m sure ? get an education in nutrition, food variety and even cooking. And I?ve overheard enough of these conversations to realize that many mothers and even some seniors really need this kind of information.

But there is yet another reason why the Department of Agriculture should not even consider this or any proposal that will hurt the income of America?s small, family farmers: national security. In an era when insects, parasites and disease can easily travel to our shores from around the world in the normal course of shipping, and just as importantly, in an age when terrorists and other enemies look for every opportunity to harm us, national security demands that we maintain as wide and diverse an agricultural base as possible. Every small farmer in New Jersey or any other state that goes out of business is one more lost bulwark against the threat of pestilence or attack in the nation?s heartland. I know from first hand conversations with farmers that the income they get from farmers markets is often the key difference between them staying in business or plowing under their fields forever.

Indeed, we just had a very real demonstration of the value of a wide and diverse agricultural base: Customers flocked to my Market, and certainly to markets throughout our region, to buy locally grown spinach in the face of the national crisis over supermarket spinach contaminated by E. coli.

The current WIC regulations work well for all concerned. The regulations have gotten incomparably fresh, nutritious produce to mothers with young children and to seniors, provided theses recipients with important nutritional information and given America?s small family farmers an absolutely vital added income. Any theoretical argument for changing these regulations is far outweighed by the demonstrable harm such a change will do.

This is truly a case of, "Since it isn?t broken, don?t fix it."



Respectfully,
Colin Egan
Manager of the Farmers Market at Journal Square



F-73

From: Jeff Cole [jeff@massfarmersmarkets.org]
Sent: Friday, November 03, 2006 5:58 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

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

RE: Docket ID Number 0584-AD77-WIC Food Package Rule

Dear Ms. Daniels:

This letter transmits comment on the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): revisions in the WIC Food Packages, Proposed Rule (7 CFR Part 246), on behalf of the Federation of Massachusetts Farmers Markets Staff, Board of Directors, and membership.

As the organization that co-founded/piloted the Farmers Market Nutrition Program (FMNP) we feel it necessary to comment based on that experience and success. We also want to be sure to commend the USDA on seeking to deliver additional fresh fruits and vegetables and their health benefits to WIC families.

The FMNP's original intent was to provide nutritional assistance to WIC families while at the same time assisting our struggling farm families. Small farms are rapidly ceasing operation and need USDA assistance to survive. We believe that any alteration to the WIC program should consider these facts.

Specifically, we want to ensure that local growers have the opportunity to participate in federal programs without making major alterations to their businesses. Our first concern is that the proposed changes to the WIC program, as currently written, make it structurally problematic for most small farms to participate in WIC's proposed fruit and vegetable voucher program. Secondly, we believe that states should have as much flexibility as possible to make the implementation of revisions to WIC as simple and cost effective as possible.

In light of these concerns, we make the following four recommendations, pertinent to the Food Delivery Systems section (246.12) of the WIC regulations. These recommendations will ensure that WIC recipients can continue to shop at farmers' markets and ensure that

farmers who sell their produce at farmers' markets continue to benefit from FMNP as well as WIC-funded benefit dollars.

WIC and FMNP Funding

We recommend that states operating WIC FMNP's be allowed the option to transfer some or all WIC fruit and vegetable funds from the WIC program to their FMNP. Such a transfer should place the funds under the authority of 7 CFR 248.

Rationale: The transfer of WIC fruit and vegetable voucher funds to the FMNP could reduce duplicate food instrument printing costs, vendor management costs and other administrative costs. WIC would benefit from the existing compliance structure currently in place within the FMNP programs as they exist now. Also, the FMNP's have a history of program integrity and expertise in vendor compliance, which will facilitate successful implementation of any new program.

Vendor Authorization

We recommend that a farmer/farmstand/and/or farmers' market participating in the WIC FMNP be automatically eligible as an authorized farmer/farmstand/and/or farmers' market to accept WIC fruit and vegetable vouchers.

Rationale: We urge USDA and FNS to continue and increase their support of opportunities for small, local growers by facilitating their participation in federal nutrition programs. Since FMNP growers are only able to produce and sell seasonally and are limited to fresh fruits and vegetables that they themselves grow, the proposed WIC vendor eligibility requirements would discourage or eliminate participation by these farmers in the revised WIC program. Market farmers require a separate set of eligibility requirements for participation in the revised WIC program.

Voucher Denomination

We recommend that States have the option to determine the WIC fruit and vegetable food instrument denominations.

Rationale: Years of experience have enabled FMNP agencies to determine the denominations that work best for their areas and seasons. Some have found that smaller denominations are cost effective and improve redemption rates, while larger denominations achieve those objectives better in other states.

Voucher Redemption Process

We recommend that states operating the FMNP be allowed to apply their FMNP food instrument redemption procedures to the redemption of WIC fruit and vegetable vouchers at farmers markets.

Rationale: Federal policy now encourages state agencies to align policies and procedures for more efficient administration of federal programs by states (e.g., Food Stamps, Medicaid, TANF). States should be permitted to align their FMNP and WIC redemption procedures at FMNP redemption sites. Alignment of FMNP and WIC fruit and vegetable voucher redemption rules would reduce administrative costs and make the process more understandable and efficient for participating farmers and markets as well as for WIC participants.

Additional Rationale for all of the above recommendations:

There are many aspects of the farmers' market nutrition program that cannot be replaced by supermarket shopping. These include social networking and the development of a sense of community in WIC families, access to community support programs, nutrition education, health and nutrition demonstration programs, and perhaps most importantly, developing a direct connection to food producers. This connection is proven to increase the consumption of fruits and vegetables and is an exceedingly cost effective method of reaching that simple but important goal.

We strongly believe that each state and, more importantly, each WIC participant, should be provided the opportunity to access the benefits local farmers and farmers markets provide should they choose to do so.

Please ensure that the proposed changes to the WIC program maintain and strengthen farmers' markets as a venue for supplying WIC recipients' fruit and vegetable needs.

Sincerely,

Jeffrey Cole
Executive Director
The Federation of Mass Farmers' Markets
a 501-C3 Corporation
240 Beaver St.
Waltham, MA 02452
phone: 781-893-8222
fax: 781-893-8777

F-74

From: WebMaster@fns.usda.gov
Sent: Sunday, November 05, 2006 10:28 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Mark Halbert
EMAIL: m.halbert@comcast.net
CITY: Battle Creek
STATE: Michigan
ORGANIZATION:
CATEGORY: Farmer or Farmers Market
OtherCategory:
Date: November 05, 2006
Time: 10:28:19 PM

COMMENTS:

The food guide pyramid has increased the number of servings of dairy from two a day to three a day. Why reduce the number of servings of dairy under the WIC program? As far as lactose intolerance is concerned, yogurt, low fat cheese, and lactaid (or lactase) should be added to accommodate those individuals needing reduced lactose products. Substitution of soy and tofu for milk sends the message that they are of equal nutritional value, which is false. Clearly, this proposal is unnecessary and unwarranted.

F-75

From: Virginia Gieseke [v.r.gieseke@worldnet.att.net]
Sent: Monday, November 06, 2006 5:35 PM
To: WICHQ-SFPD
Subject: new guidelines for WIC food program

I manage a farmers' market in Des Moines, Iowa. We are a big WIC market. I am very pleased that the USDA has been working on new guidelines for the WIC program. The WIC shoppers at my market really appreciate the fresh Iowa-grown produce.

So, I am writing to ask you to make the new guidelines even stronger by using the Institute of Medicine's full recommendations for the amount of fruits and vegetables needed for a nutritionally adequate children's food package.

Also, please make the new, expanded use of the WIC "cash-value food instrument" with the WIC FMNP, which will automatically allow WIC FMNP-qualified markets and farmers to redeem the new WIC cash-value food instrument.

Thank you for your time and consideration.

Virginia Gieseke
1030 59th St.
Des Moines, IA 50311

F-76

From: WebMaster@fns.usda.gov
Sent: Monday, November 06, 2006 4:56 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Wanda Banks-Green
EMAIL: magiceventtouch@yahoo.com
CITY: Lansdowe
STATE: pa
ORGANIZATION:
CATEGORY: Farmer or Farmers Market
OtherCategory:
Date: November 06, 2006
Time: 04:56:12 PM

COMMENTS:

WIC should offer soy milk, fresh fruit

F-77

From: no-reply@erulemaking.net
Sent: Monday, November 06, 2006 2:08 PM
To: CNDPROPOSAL
Subject: Public Submission

Please Do Not Reply This Email.

Public Comments on Special Supplemental Nutrition Program for Women, Infants and Children (WIC): Revisions in the WIC Food Packages:=====

Title: Special Supplemental Nutrition Program for Women, Infants and Children (WIC):
Revisions in the WIC Food Packages FR Document Number: 06-06627 Legacy
Document ID:
RIN: 0584-AD77
Publish Date: 08/07/2006 00:00:00
Submitter Info:

First Name: John
Last Name: Melick
Mailing Address: P.O. Box 73
City: Oldwick
Country: United States
State or Province: NJ
Postal Code: 08858
Organization Name: Melick's Town Farm

Comment Info: =====

General Comment:

November, 6, 2006

Patricia N. Daniels
Director, Supplemental Food Programs Division, Food and Nutrition Service USDA
3101 Park Center Drive, Room 528
Alexandria, Virginia 22302

Dear Patricia:

My name is John Melick and I am a tenth generation farmer located in Oldwick, New Jersey. Over the years our farm has transitioned from a wholesale oriented clientele to a retail sales base in order to stay profitable. At the present time we operate four daily farm markets as well as participating in four community sponsored farmers markets

throughout north and central New Jersey. We are still farming because of this transition and look forward to a prosperous future.

The proposed rule changes to the WIC program would impact our profitability at two of our four community farm markets thus forcing ourselves to ask the question of whether or not we should continue to sell in these urban communities where WIC checks represent a significant portion of our income. If we are no longer able to maintain profitability in these communities we will be forced to drop these towns. Not only will this hurt our business and other local farmers such as us, but the people purchasing and enjoying our fresh and delicious produce will suffer as well.

Please reconsider these rule changes. The loss to local farms surrounding the urban areas where the majority of the WIC checks are redeemed will be significant. This will only contribute to the loss of the local farm and farm families while aiding the proliferation of the corporate farms that dominate the rapidly consolidating agricultural landscape. In this day and age of heightened food security concerns, I am sure that the USDA would want to do everything possible to reverse this trend and keep the small farmer profitable.

Very truly yours,

John V. Melick, co-owner
Melick's Town Farm

F-78

From: robin.shuster@verizon.net
Sent: Monday, November 06, 2006 6:25 PM
To: WICHQ-SFPD
Subject: "Docket ID Number 0584-AD77, WIC Food Packages Rule"

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

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]

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

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,

My name is Robin Shuster and I am the director of the Mount Pleasant Farmers Market in Washington DC. We have a very important WIC program at our Saturday producer only local food market, serving hundreds of WIC recipients. I was very pleased to see that the USDA recognizes the importance of increasing the consumption of fresh fruit and vegetables by WIC recipients and I very strongly support the inclusion of vouchers to purchase fruits and vegetables and the ability to use them at farmers' markets.>>

I hope you will coordinate the proposed new, expanded use of the WIC "cash- value food instrument" with the WIC Farmers Market Nutrition Program (FMNP), including automatically allowing WIC FMNP-qualified markets and farmers to redeem the new WIC cash-value food instrument. The more fruits and vegetables we can supply our WIC recipients, the better. The nutritional



value of eating more fruits and vegetables has been well documented and every thing we can do to increase their consumption will result in healthier mothers and children.

Farmers Markets play a very important part in bringing nutritious and local fresh fruits and vegetables to women and children who might otherwise not have access to them and we look forward to being able to increase their access to this nutritionally crucial foods.

Sincerely yours,

Robin B Shuster
Mount Pleasant Farmers' Market



F-79

From: no-reply@erulemaking.net
Sent: Monday, November 06, 2006 2:15 PM
To: CNDPROPOSAL
Subject: Public Submission

Please Do Not Reply This Email.

Public Comments on Special Supplemental Nutrition Program for Women, Infants and Children (WIC): Revisions in the WIC Food Packages:=====

Title: Special Supplemental Nutrition Program for Women, Infants and Children (WIC):
Revisions in the WIC Food Packages FR Document Number: 06-06627 Legacy
Document ID:
RIN: 0584-AD77
Publish Date: 08/07/2006 00:00:00
Submitter Info:

First Name: John
Last Name: Melick
Mailing Address: PO Box 1114
City: Madison
Country: United States
State or Province: NJ
Postal Code: 07940-1114
Organization Name: New Jersey Council of Farmers and Communities

Comment Info: =====

General Comment:

November, 6, 2006

Patricia N. Daniels
Director, Supplemental Food Programs Division, Food and Nutrition Service USDA
3101 Park Center Drive, Room 528
Alexandria, Virginia 22302

Dear Patricia:

I am writing you as the president of the New Jersey Council of Farmers and Communities (NJCFC). Our organization has played a pivotal role in linking up farmers with communities interested in sponsoring local farmers markets in central and northern New Jersey over the past 20 years. Currently we have 25 community markets serviced by

roughly 45 farmers. NJCFC has worked closely with the New Jersey Department of Agriculture in order to establish new markets in urban locations where WIC checks are redeemed. Most if not all of our farmers are registered to receive the WIC checks.

We are very concerned that the proposed rule changes will place many of the urban markets in jeopardy because of their heavy dependence on WIC check redemptions. Many of these markets would cease to exist if these checks would be accepted at supermarkets. This would impact the participating farmers, the local merchants who benefit from the increased foot traffic on the days of the markets and the consumers who would be losing out on the fresh and better tasting produce that these markets provide.

Please reconsider these rule changes. The loss to local farms surrounding the urban areas where the majority of the WIC checks are redeemed will be significant. This will only contribute to the loss of the local farm and farm families while aiding the proliferation of the corporate farms that dominate the rapidly consolidating agricultural landscape. In this day and age of heightened food security concerns, I am sure that the USDA would want to do everything possible to reverse this trend and keep the small farmer profitable.

Very truly yours,

John V. Melick, President
New Jersey Council of Farmers and Communities

F-80

From: WebMaster@fns.usda.gov
Sent: Monday, November 06, 2006 3:00 PM
To: WICHQ-SFPD
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Christopher Wernau
EMAIL: chriswernau@yahoo.com
CITY: concord
STATE: ga
ORGANIZATION: wic nutrition program - georgia farmer
CATEGORY: Farmer or Farmers Market
OtherCategory:
Date: November 06, 2006
Time: 03:00:16 PM

COMMENTS:

As a farmer I support:

- vouchers to be used for local fresh fruits and vegetables
- redemption of vouchers at approved farmer market locations, such as county health department locations

Direct contact with the participants allows for a dialogue between the farmer and consumer which does not typically occur directly when shopping in a supermarket. This communication allows for exchanging of ideas and recipes for using the local fresh fruits and vegetables. Since many urban recipients do not have exposure to farming activities, it connects both parent and child to who produces their food and where it comes from.

Direct voucher exchanges to WIC participants also guarantees that farmer receives a better price than selling in bulk at farm gate commodity prices. As a farmer, capturing more value is important given the challenges of agriculture.

As a farmer I oppose:

- redemption of fruit and vegetable vouchers at local supermarkets and grocery stores
- reductions in the amounts available to be used for local fresh produce

If WIC participants could redeem vouchers from supermarket and grocery stores, they may not realize whether the fruits and vegetables are local. The stores may not guarantee the freshest produce either. Profits are kept by the stores and not passed back to the agricultural community.



Therefore, adverse changes to the regulations would affect both the participants and the farmers who enjoy serving our customers directly.

F-81

From: Dee Logan [deniselogan@yahoo.com]
Sent: Tuesday, November 07, 2006 1:34 AM
To: WICHQ-SFPD
Subject: "Docket ID Number 0584-AD77, WIC Food Packages Rule,"

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive Room 528
Alexandria, Virginia 22303

Dear Ms. Daniels:

REF Docket ID Number 0584-AD77-WIC Food Package Rule

As a market manager/market coordinator in the state of Arizona, I am writing to strongly support the proposed revisions in the WIC food packages as proposed by the USDA.

Fresh fruits and vegetables which we in the farmers markets have come to take for granted are a scarcity in some of the diets of the individuals who are WIC participants.

Over the last 5 years we have seen first hand the great reception of the FMNP vouchers in our markets; and the comments of the participants coming out of the markets, sometimes for the first time, have been especially gratifying to us. especially as young mothers and children try new vegetables and fruits for the first time.

Your team is well aware of the health benefits of these freshly harvested products, but the benefit to our growers and small farmers have been gratifying also.

They have participated in a significant program that allows them to sell what they grow to new customers, which is giving them an increased incentive to talk about their crops, and discuss how and what the "new" vegetable or fruit is and how to use it.

Having an additional source of WIC participants utilizing coupons in the market will tie in wonderfully with the impetus we are receiving with the FMNP vouchers.

In order for WIC recipients to secure as much nutritional value from the use of the proposed fruit and vegetable WIC vouchers at farmers' markets as possible, we offer the following suggestions as you and your team review and finalize these innovative new regulations for the WIC program:

· Consistent with Institute of Medicine 's recommendation, I support their suggested amount of \$10 per month of fruits and vegetables for mothers and \$8 for children, an increase from the amount proposed in your current draft regulations of \$8 monthly for mothers and \$6 monthly for children between 2 and 5 years.

· I ask that in implementing the new expanding WIC program, that you continue to fund and foster the existing modest WIC Farmers Market Nutrition Program, maintaining existing funding levels and keeping the current rules, systems, or procedures at the federal or state levels that support the current operation and effectiveness of the WIC FMNP.

· With respect to vendor specification procedures, farmers' markets should be permitted to participate as seasonal vendors since most farmers' markets in the country are unable to operate year round. Similarly, farmers' market shall be exempt from the "WIC-only" cost containment requirement and shall not be required to carry a full-range of WIC food package products

· I would also ask that substantial efforts should be made to promote coordination between the proposed WIC fruit and vegetable cash voucher program and the existing WIC Farmers Market Nutrition Program. Farmers and farmers' markets that are currently authorized under state WIC FMNP procedures should be automatically eligible for vendor specification under the new fruit and vegetable voucher program. These WIC FMNP farmer and farmers' market authorization procedures should also be applied by states in the future vendor specification process.

· When practicable, states should seek to develop systems for the distribution and use of the new WIC fruit and vegetable cash vouchers that are compatible with existing WIC FMNP procedures. Nutrition education efforts and state and local promotion of fresh fruit and vegetable vouchers should be compatible with and seek to take advantage of existing WIC FMNP education and promotion practices. States shall be required to allow farmers' markets as eligible vendors, provided that they comply with farmer and farmers' market authorization procedures.

· Keeping in mind that farmers' markets carry a wide selection of locally produced fresh fruit and vegetables, state agencies shall not limit the range of fruit and vegetable items that may be purchased with fruit and vegetable vouchers.

· Preference shall be given to fresh fruits and vegetables first, then to frozen, and lastly canned.

· There shall be a cost of living adjustment

reflected in the value of the vouchers in order to keep pace with inflation.

- The denomination of fruit and vegetable instruments shall be \$2.00 and no change shall be given for vouchers that don't purchase their full denominational value.

- State advisory groups should be established to develop the most effective and responsive system possible. Where states and/or municipalities have food policy councils, their participation in the advisory process is strongly encouraged.

- In the event that states adopt EBT technology for the use of nutrition benefits by WIC recipients, farmers' markets must also be provided with the most practical EBT systems.

- Just as farmers' markets have been pioneers in making the best fruits and vegetables available to people and places that need them the most, I encourage WIC to make high quality fresh fruits and vegetables available in all outlets that serve WIC recipients. In this regard the national WIC Program should consider implementing pilot projects that test various methods of increasing access to fresh produce, with a variety of retail food outlets including farmers' markets, in areas that are poorly served by such outlets.

I again thank and commend you and your team for the forward-looking proposal to make fruits and vegetables a regular part of the WIC food package. This advance in the food package will not only prove immeasurably valuable for lower income women and children, but also assist the nation's family farmers for whom farmers' markets are essential to preserving their livelihoods.

I feel that farmers' markets can make a substantial contribution to the success of this new initiative, one that promises to provide a healthy tomorrow for all Americans.

Sincerely,

Dee Logan
Arizona Community Farmers Market Group
623-848-1234
POBOX 14188
Phoenix, AZ 85063

Dee Logan

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