



Robert N. Pyle & Associates, Inc.
WIC Consultant

VIA HAND DELIVERY

December 15, 2003

Patricia Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive
Room 520
Alexandria, Virginia 22302

RE: Revisions to the WIC Food Packages

Dear Ms. Daniels:

This letter is in response to the *Federal Register* notice dated September 15, 2003 regarding the Special Supplemental Nutrition Program for Women, Infants and Children (WIC): Revisions to the WIC Food Packages.

Kraft Foods is deeply committed to the WIC Program. Kraft offers over 80 different WIC eligible cheese items. Kraft's processed and natural cheeses are available in a variety of forms (including block cheese, sliced cheese, shredded cheese, cubed cheese and string cheese) and nutrition profiles (including reduced fat and non-fat cheeses). Almost every state, Native American tribe and territory in the U.S. allows some Kraft cheeses for their WIC participants.

The WIC program currently provides up to four pounds of cheese per month to eligible, at-nutritional risk, low-income women and children. Kraft strongly believes that continuing to offer cheese on the WIC food package at the current level can help provide a solution for these women and children. Our comments below detail the nutritional benefits of cheese, how offering cheese on WIC can help the WIC population obtain important nutrients, and the positive effect of cheese on participants' overall diets, including those watching their weight.

Cheese is an Excellent Source of Nutrition

Cheese is a good source of calcium, providing 10-25% DV depending on the type. Calcium is an important mineral in key physiological functions, skeletal development, and blood pressure regulation. Cheese also contributes protein, riboflavin, phosphorous, and zinc to the diet, all of which are important nutrients necessary to provide healthy growth and development. Protein is needed for normal body function, growth, and prevention of diseases. Zinc, a trace mineral, works as an enzyme in many metabolic pathways. Phosphorous and riboflavin are essential nutrients for metabolism as well. The nutritional benefits of cheese are especially important to pregnant women, whose overall nutrition needs are enhanced when carrying an unborn baby, and to young children as they experience periods of rapid growth.

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Many WIC Participants Do Not Get Enough of the Nutrients that Cheese Provides

The benefits of dairy foods, like cheese, are well documented; unfortunately, all consumption data and leading government surveys relay the same result – dairy and calcium consumption is inadequate. Yet we know that when children consume dairy products, it improves the overall nutrition profile of their diet. The American Academy of Pediatrics (AAP) recommends adequate diets to support growth and development of children, especially during early years. The AAP reports intake of dairy/calcium-rich foods during early childhood as an important determinate of skeletal development, bone health, and future risk for osteoporosis.

The USDA Food Guide Pyramid suggests women and children consume about 2-3 servings of dairy each day. In addition, the National Academy of Sciences recently issued increased calcium recommendations that require about 3-4 servings of dairy products each day to meet the needs of a healthy population. Yet, a recent USDA survey, finds that only 54% of children and 14% of women age 20 or older meet the Pyramid recommendations for 2-3 servings of dairy each day. Similarly, the majority of women and children do not meet recommendations for calcium intake (DRI). In fact, one of the Healthy People 2010 objectives is to increase the percentage of persons aged 2 years and older that meets dietary recommendations for calcium. Currently, only 46% of persons 2 years and older consume 77% of the amount of calcium recommended; Healthy People 2010.

Pregnancy presents additional nutrient demands on women. The need for calcium during pregnancy is increased by 33% to maintain bone density and to mineralize infant bone. Yet, the USDA CSFII reports that only 24% of pregnant and lactating women consume 3 or more serving of calcium-rich foods.

Additionally, cheese contributes a much smaller amount of lactose to a diet than dairy milk (0-1 gram vs. 9-12 grams, respectively, AJCN: Supplement 48(4) 1988). It has been estimated that approximately 25% of the U.S. population avoids milk due to some type of lactose concerns. These persons generally have lower intakes of calcium and other important nutrients typically supplied by milk. Additionally, 58% of those involved in the WIC program belong to ethnic groups with a higher prevalence of lactose maldigestion (Black, Hispanic, Asian, and Caucasian, in descending order of prevalence). Cheese provides a calcium rich alternative for these people who otherwise may not consume dairy foods. Education about consumption of lower lactose dairy, like cheese, may be helpful in closing the nutrient gap of calcium in the diet of culturally and ethnic diverse populations at-nutritional risk.

Cheese Is Part of a Healthy Diet, Including For Those Watching Their Weight

The consumption of cheese contributes positively to the overall quality of one's diet without necessarily increasing total calorie intake. No specific scientific evidence reports that cheese contributes to obesity. In fact, recent observational studies associate lower body weight with the consumption of a diet high in calcium and/or dairy foods, like cheese. Numerous epidemiological studies have been published in leading medical journals on this topic (Heaney et al). One of the recent key studies was "Dairy Consumption: Obesity and Insulin Resistance Syndrome in Young Adults, The CARDIA study", (Pereira et al). CARDIA, a population-based prospective study, suggests that increased dairy consumption may protect overweight persons from the development of obesity and insulin resistant syndrome, both key risk factors for the development of non-insulin dependent diabetes and cardiovascular disease in the U.S. Consumption trends over the past several decades show reduced consumption of dairy products among children in the U.S. and their replacement with sodas and snacks. Emerging evidence suggests that calcium may play a role in the regulation of energy metabolism and in modulating obesity risk (Zemel et al). These observational and intervention studies suggest the need to consume adequate dairy/calcium diets, but more research is needed.

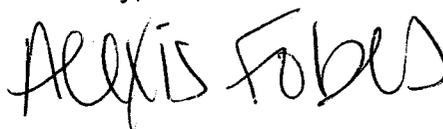
WIC nutritionists can help serve the needs of those looking to control their weight while fulfilling nutrient needs by promoting lower fat and lower calorie cheese alternatives to their WIC clients. Cheeses made with 2% milk or reduced fat and low-fat cheeses are both lower in fat and in calories (3-6g fat, 80-90 calories vs. 5-10 g fat, 100-130 calories, respectively, per FDA reference amount) and are currently allowed on most state WIC Approved Foods List. WIC can aid the at-risk populations it serves by continuing to provide a variety of reduced fat and reduced calorie cheese alternatives that are nutrient dense and deliver high quality protein and calcium.

While cheese does contain saturated fat, sodium and dietary cholesterol, which are of dietary concern to the American population, the benefits of consumption far outweigh this fact. According to the most recent USDA food disappearance data, dairy foods make up a much smaller contribution to saturated fat and cholesterol intake for Americans than fats, oils, meat, fish and poultry (USDA Report No. 53, 1997). The recently published DASH diet studies show that increasing consumption of dairy, fruits, and vegetables to provide nutrients like calcium, potassium, and magnesium have a beneficial effect on blood pressure, a major risk factor for cardiovascular disease (Appel, et al). Experts agree that consuming an adequate diet of calcium, potassium, and magnesium helps lower blood pressure (USDHHS). Clinical guidelines recommend lifestyle modifications, such as reducing body weight, increasing physical activity, and reducing sodium while increasing calcium, potassium and magnesium in the prevention and treatment of hypertension (USDHHS).

Conclusion

After reviewing these comments, we hope the committee clearly recognizes that cheese offers significant nutrition benefits, helps WIC participants obtain nutrients they often are lacking, and contributes positively to the overall diet of WIC participants. This is why Kraft strongly believes that continuing to offer cheese on the WIC food package at the current level can help provide a solution for women and children at-nutritional risk. If you have any questions, please telephone me at (202) 342-7678. Thank you.

Sincerely,



Alexis Fobes
WIC Consultant

Enclosure

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