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From: beth_hartell@campbellsoup.com
[mailto:beth_hartell@campbellsoup.com]
Sent: Friday, December 01, 2006 4:55 PM
To: WICHQ-SFPD
Subject: Docket ID Number 0584-AD77, WIC Food Packages Rule

December 1, 2006

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

On November 6th, Campbell Soup Company submitted its comments on the proposed WIC Food Package Revisions (Federal Register Notice: Vol. 71, Number 151, August 7, 2006). We are resubmitting our comments with a revised version of Table 1. In the revised table we are rounding down the amount of vegetable cups per serving for ease of reference and to be consistent with our communications with the public.

Thank you,

Chor-San Khoo, Ph D
Vice President
Global Nutrition & Health
Ph. 856-342-4935
Admin. 856-342 4859
(BH)

(See attached file: CSC Comments to USDA 110606-2 FINAL.pdf)



Campbell Soup Company
1 Campbell Place
Camden, NJ 08103

November 6, 2006

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

Re: Federal Register Notice: Vol. 71, Number 151, August 7, 2006 Revisions to the WIC Food Package

Dear Director Daniels:

Campbell Soup Company is pleased to have the opportunity to supply USDA with its recommendations and comments on the WIC food package.

Campbell Soup Company is a global manufacturer and marketer of high quality simple meals, soup, baked snacks, vegetable-based beverages, and premium chocolate products, with annual revenues in excess of \$7.3 billion. Founded in 1869, the company has a portfolio of more than 20 market-leading brands, including *Campbell's*®, *Pepperidge Farm*®, *Arnott's*®, *V8*®, and *Godiva*®. The company is ably supported by 23,000 employees worldwide.

Campbell Soup Company is proud of its long-time participation in the WIC program, providing *V8*® 100% vegetable juice and *Campbell's*® tomato juice to WIC clients for over 15 years. Campbell Soup Company is a strong supporter of WIC because of its mission to improve the nutritional health of women and children. We applaud USDA's effort to reform the food package for the WIC program, to be more clearly aligned with the 2005 Dietary Guidelines and to encourage increased vegetable, fruit, and whole grain intake.

While the proposed food package has made improvements for WIC participants, Campbell has identified options that will provide greater participant flexibility, acceptability, and ultimately better compliance for nutritional improvement. These include:

- I. Expanding vegetable options by including vegetable soup;
- II. Addressing calorie and sugar concerns of juice by establishing a portion of the juice category as vegetable juice;
- III. Further expanding of flexibility and convenience of the canned bean category and encouraging consumption by adding canned beans in sauce;
- IV. Providing additional protein options by adding culturally relevant canned chicken; and
- V. Supporting increasing the vegetable and fruit voucher by \$2, as originally proposed by IOM.

I. Expanding vegetable options by including vegetable soup

We recommend including canned vegetable soups that contain at least ½ cup of vegetables as another option for the fruit and vegetable voucher. Expanding this option can encourage better compliance and nutrition among WIC participants. Canned vegetable soups provide a variety of key nutrients, and are moderate calorie options. Vegetable soups are familiar and widely accepted across age groups and cultures. In addition, *Campbell's®* soups are manufactured with the highest standards of quality and food safety.

There are many compelling reasons why canned vegetable soups should be included in the WIC program:

- **Nutrition** - Canned vegetable soups provide a variety of convenient and appealing choices for WIC participants. Canned vegetable soups are moderate calorie options, are usually low in fat, and are available in a variety of sodium content options. They also often provide a good source of vitamin A, vitamin C or potassium, and a significant source of fiber. Both fiber and potassium have been identified as priority nutrients for WIC children and mothers, and vitamins A and C are nutrients of inadequacy for WIC mothers.¹ See Table 1 (Appendix) for canned vegetable soup nutrition information.
- **Convenience** - Offering processed options is important to many WIC participants. Although USDA has taken a large step forward by allowing canned and frozen vegetables and fruit in addition to fresh, canned vegetable consumption has declined over 15% in America over the past five years.² Allowing ready to consume foods like soup, will make it easier and more desirable for WIC participants to include vegetables in their and their families' diets. WIC mothers are busy like other mothers; they need convenient foods to quickly prepare foods for themselves and their families.
- **Variety** – Many canned vegetable soups provide a mixture of vegetables, consistent with dietary guidance. Additionally, as many pregnant women experience nausea during some part of their pregnancy, it is important to offer a wide selection of diverse foods to insure they find foods they feel comfortable eating.
- **Price** - As shown in Table 2 (Appendix), the price per ½ cup of vegetables between Campbell's canned vegetable soups and canned vegetables is similar, with Campbell's soups only costing a few cents more per ½ cup of vegetables.
- **Cultural acceptability**- Thirty-nine percent of WIC participants are Hispanic.³ Hispanic families consume soup frequently.⁴ In 2004, Hispanic families consumed an average of 64 servings of soup per year per person – an index of 166% vs. non-Hispanics.⁴ In fact, soup and chicken are the most popular main courses for Hispanics.⁴
- **Child acceptance** - Soup is also a favorite food with children; in fact, for children ages 2-5, soup is the 2nd most commonly consumed food for lunch, following PB&J.⁵ It is also the 6th most commonly consumed food for children ages 2-5 at dinner.⁵

- **Research** – Research has shown that intake of soup is associated with lower calorie intake and better nutrient density, and thus is consistent with key messages of the Dietary Guidelines. In addition to be associated with improved diet quality, soup has been shown to be an effective way to help reduce calories and lose weight, or as part of a weight control plan.

Details on research are shown below:

Research shows that diet quality of people who consume soup is better than those who don't consume soup:

- An analysis of NHANES III 1988-94 and CSFII 1994-96 data showed diets of individuals, ages 18+ who included soup (soup users - S) are associated with reduced caloric and fat intakes as well as improved nutrient density when compared to diets of individuals who did not include soup (non soup users - NS). Soup users (those defined as having 0.5 to 3 cups of soup per day) had statistically significantly higher intakes of vitamin A, vitamin C, vitamin B12 and folate than those who did not consume soup. Soup users had significantly lower intakes of total fat (S 67.24g vs. NS 77.6g, $p \leq 0.01$), saturated fat (S 22.2g vs. NS 26.07g, $p \leq 0.01$) and cholesterol (S 262.5 mg vs. NS 287.7mg, $p \leq 0.01$). Also, female soup users consumed more fiber than female non-soup users (S 62.5g vs. NS 55.9g, $p \leq 0.01$). In addition, soup users consumed significantly fewer calories than non-soup users both for total population (S 1900.5 calories vs. NS 2063.6 calories, $p \leq 0.01$) and when broken out by gender.⁶
- In an analysis of CSFII 1994-96, 1998 survey data, the diets of soup users contained more fruit, legumes, whole grains, green and yellow vegetables, and fish; significantly less discretionary fat (50.7g vs. 59.18g, $p \leq 0.01$); and fewer teaspoons of added sugar (16 tsp. vs. 20.11 tsp., $p \leq 0.01$). These findings suggest that soup users consume a diet more consistent with the Dietary Guidelines.⁷
- A recent study completed in the UK found that supplementation with carotenoid-rich soups and beverages increased dietary carotenoids, vitamin C, alpha-tocopherol, potassium and folate, and the plasma concentrations of alpha-carotene.⁸
- A French study found that heavy consumers of soup had higher dietary intakes of folate, beta-carotene, and vitamin C, and lower fat intakes.⁹

Research shows that soup can be a useful tool to help with weight management:

The prevalence of obesity and overweight has been increasing within the US population at large, and among the WIC population. Data from NHANES 2003-2004 for population categories that include WIC participants, found that for women ages 20-39, 52% are overweight or obese, with 29% being obese. For Hispanics, 69% of women ages 20-39 are overweight or obese and 36% are obese. The prevalence of children overweight/at risk of overweight is continuing to increase; for male children ages 2-5, 27% are at risk of overweight/overweight with 15% being overweight, and for female children ages 2-5, 25% are at risk of overweight/overweight with 13% being overweight.¹⁰ A New York City study found 38% of the WIC-participating children were overweight or at risk of being overweight.¹¹

In addition to being associated with improved diet quality, soup has been shown to be an effective way to help reduce calories and lose weight, or as part of a weight control plan:

- One study found that people who had soup as their first course in a meal consumed an average of 100 fewer calories in that meal compared with those who did not eat soup.¹²
- In another study, people who followed a low calorie diet that included soup lost weight.¹³
- Another study by Dr. Barbara Rolls found that eating soup (e.g. Chicken and Rice soup) reduced calorie intake of subsequent meals more effectively than eating the ingredients (chicken, rice) separately followed by a glass of water.¹⁴
- In a recent 1-year weight loss study at Penn State, all groups lost weight; however, a greater proportion of subjects who consumed soup during the study (as opposed to snacks at the same calorie level or the comparison group) answered “very full” or “extremely full” when asked “How full do you feel after your meals while on this food plan?”¹⁵

These results show that soup can be a useful tool in managing calories. This information is especially important for women who are post-partum and who need to return to their pre-pregnancy weight.

Soup was excluded as a processed vegetable option for the fruit and vegetable voucher by the Institute of Medicine in their WIC Food Package report because of the concern that vegetable soups could include cream-based vegetable soups that didn't provide a certain amount of vegetables. Campbell is proposing only those soups that deliver the ½ cup per 8-oz serving of soup standard. Additionally, sodium is commonly raised as a concern with canned soup. Campbell offers soups in a wide variety of sodium levels, including 25% Less Sodium (sodium ≤650mg), *Healthy Request*® (sodium ≤480mg, meeting the healthy criteria for labeling and the American Heart Association's Heart Check Mark) and Low Sodium (sodium ≤140mg) options.

For the reasons stated, we urge USDA to include canned vegetable soups providing at least ½ cup of vegetables per serving in the WIC food package.

II. Addressing calorie and sugar concerns of juice by establishing a portion of the juice category as vegetable juice

Campbell recommends maintaining the juice category at its original level, and that half of the juice offered should be specified as vegetable juice. The proposed WIC food package has lowered the amount of juices allowed, to be in alignment with AAP recommendations for consumption of juice by children. According to the AAP guidance document, “The Use and Misuse of Fruit Juice in Pediatrics” it is clear that they are only discussing limiting fruit juice to children, due to its calorie and sugar content.¹⁶ As vegetable juice has half the calories, carbohydrates and sugar content of fruit juice, it should not be treated the same as fruit juice.

In Table 3 (See Appendix), the nutrition of vegetable juice, such as V8® 100% vegetable juice, is shown to be very different from fruit juice. Calories, carbohydrates and sugar

are all naturally much lower in vegetable juice than in fruit juice. In light of increasing obesity, highlighting the lower calorie juice option will provide the WIC population lower calorie choices. Additionally, beyond providing vitamin C, vegetable juice, such as V8 vegetable juice, provides a good source of vitamin A, magnesium, and potassium, and has 2 grams of fiber. Separating vegetable juice from fruit juice (by specifying half of the juice as vegetable juice) will help WIC participants obtain a balance of fruits and vegetables, and help them obtain the wide variety of nutrients they need in their day. Regular V8, Low Sodium V8, Calcium Enriched V8, and Essential Antioxidants V8 vegetable juices meet FDA's criteria for healthy, and carry the American Heart Association heart check. Campbell's vegetable juices are available in a variety of lower sodium options.

If a reduction in total juice is still seen as a necessary approach, then we still recommend specifying half of the juice be vegetable juice for the reasons outlined above.

III. Further expanding of flexibility and convenience of the canned bean category and encouraging consumption by adding canned beans in sauce

Campbell applauds the inclusion of canned beans as an option for WIC participants. However, the proposed food package excludes canned beans with sauce. For many, the flavor and convenience of canned beans with sauce provides incentive to incorporating beans into their diet. *Campbell's*® canned beans in sauce provide an excellent source of fiber, are low in fat and saturated fat, and meet labeling criteria to be considered healthy. See Table 4 for nutrition and pricing information, comparing *Campbell's* canned beans in sauce with other canned beans.

As outlined earlier, WIC participants need convenient and nutritious options that will allow them to quickly prepare and consume foods. Canned beans are often used in cooking or as a side dish with other ingredients; therefore canned beans in sauce are ready to be eaten as is without any additions. We recommend the inclusion of canned beans in sauce to the canned bean category.

IV. Providing additional protein options by adding culturally relevant canned chicken

The proposed food package adds different types of canned fish beyond tuna to vary the protein options for WIC participants. We propose that canned chicken should also be included. Canned chicken is an excellent source of protein and price value; see Table 5 (Appendix) for a price and nutrition comparison of canned tuna, salmon, sardines, and *Swanson*® canned chicken in water.

The NWA WIC Culturally Sensitive Food Prescription Recommendations included recommendations for additional foods that could increase the cultural acceptance of the WIC food package. In their recommendations for Hispanic, African American, Native American, and Alaskan cultures, they recommend canned chicken as a culturally appropriate option to substitute for peanut butter/beans/eggs.¹⁷ The addition of another option for this category of the revised package would allow for increased variety and

choices – two important factors for the new packages. In addition, canned chicken is an economical choice, costing on average \$1.58-\$1.97 for 4.5 ounces of canned chicken, with a price per ounce similar to branded canned salmon or tuna in foil pouches.

V. Increase the vegetable and fruit voucher to reflect IOM's original proposed level.

We support the IOM's recommendations for the vegetable and fruit vouchers, and believe the voucher amounts should be maintained at the IOM's proposed \$10 and \$8 dollar levels. IOM's proposal was based on the low intakes of fruit and vegetables by WIC participants and maintaining their recommendations will provide WIC participants greater nutrition benefits.

Conclusion:

To summarize, Campbell recommends further enhancements to the WIC food package from the initial USDA proposal to offer participants more convenient and culturally relevant options in order to improve overall nutrition. We recommend:

- Including processed vegetable options like canned vegetable soups that provide at least ½ cup of vegetables per 8-ounce serving of soup;
- Maintaining the original amount of juice in the juice category, but separating vegetable juice from fruit juice because of the more favorable nutritional profile of vegetable juice and having half of the juice category be specified as vegetable juice;
- Adding canned beans in sauce as a healthy option for WIC participants to incorporate more protein into their diets;
- Adding canned chicken as a choice within protein options to meet cultural needs; and
- Maintaining the fruit and vegetable voucher amounts at the levels set by IOM in their proposal for the WIC food package, at \$10 for women and \$8 for children.

Respectfully submitted,



Chor San Khoo, Ph.D.
Vice President Global Nutrition and Health
Campbell Soup Company

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Appendix:

Table 1: The nutrition profiles of several *Campbell's®* condensed soups that provide at least ½ cup of vegetables per 8-oz prepared serving are reproduced below. (Note - Low Sodium soups are not condensed – they are ready-to-serve and their serving size is one can.)

| Campbell's® Soup | Serving Size | Calories | Total Fat (g) | Saturated Fat (g) | Trans Fat (g) | Cholesterol (mg) | Sodium (mg) | Potassium (mg) | Total Carbohydrate | Dietary Fiber (g) | Sugars (g) | Protein (g) | Vitamin A %DV | Vitamin C %DV | Calcium %DV | Iron %DV | Magnesium %DV | Vegetable (cups) |
|---|--------------|----------|---------------|-------------------|---------------|------------------|-------------|----------------|--------------------|-------------------|------------|-------------|---------------|---------------|-------------|----------|---------------|------------------|
| Low Sodium Varieties | | | | | | | | | | | | | | | | | | |
| Low Sodium Chunky Vegetable Beef Soup | 1 Can | 170 | 4.5 | 1.5 | 0 | 30 | 50 | 450 | 18 | 6 | 7 | 14 | 80 | 0 | 4 | 4 | - | 1/2 |
| Low Sodium Split Pea Soup | 1 Can | 240 | 4 | 1.5 | 0 | 5 | 30 | 520 | 38 | 6 | 6 | 12 | 25 | 0 | 4 | 10 | - | 1/2 |
| Low Sodium Tomato with Tomato Pieces Soup | 1 Can | 150 | 4 | 1.5 | 0 | 10 | 90 | 540 | 25 | 4 | 16 | 4 | 10 | 10 | 4 | 6 | - | 1 |
| Reduced Sodium Varieties | | | | | | | | | | | | | | | | | | |
| 25% Less Sodium Tomato Soup | 1 cup prep. | 90 | 0 | 0 | 0 | 0 | 530 | 260 | 20 | 1 | 12 | 2 | 10 | 10 | 0 | 2 | 8 | 1/2 |
| Healthy Request® Tomato Soup | 1 cup prep. | 90 | 1.5 | 0.5 | 0 | 0 | 470 | 280 | 17 | 1 | 10 | 2 | 8 | 10 | 0 | 0 | 6 | 1/2 |
| Healthy Request® Vegetable Soup | 1 cup prep. | 100 | 1 | 0 | 0 | 0 | 480 | 500 | 19 | 3 | 5 | 4 | 50 | 0 | 2 | 4 | 6 | 1/2 |
| Regular Varieties | | | | | | | | | | | | | | | | | | |
| Goldfish® Pasta in Tomato Soup | 1 cup prep. | 130 | 0.5 | 0 | 0 | 0 | 540 | 45 | 28 | 3 | 15 | 3 | 10 | 4 | 0 | 4 | 6 | 1/2 |
| Tomato Noodle Soup | 1 cup prep. | 120 | 0.5 | 0 | 0 | 5 | 660 | 200 | 25 | 2 | 13 | 3 | 10 | 10 | 0 | 0 | - | 1/2 |
| Tomato Soup | 1 cup prep. | 90 | 0 | 0 | 0 | 0 | 710 | 260 | 20 | 1 | 12 | 2 | 10 | 10 | 0 | 4 | - | 1/2 |
| Vegetarian Vegetable Soup | 1 cup prep. | 90 | 0.5 | 0 | 0 | 0 | 790 | 210 | 18 | 2 | 6 | 3 | 50 | 0 | 2 | 4 | - | 1/2 |

Table 2: Price comparison, comparing the retail price per 1/2 cup serving of vegetables and nutrition of several common canned/frozen canned vegetables, and Campbell's canned vegetable soups.

| Product | Price | Size of Package | # of 1/2 cup servings of Vegetables | Price per 1/2 cup of Vegetables | Serving Size |
|--|--------|-----------------|-------------------------------------|---------------------------------|--------------|
| Canned Vegetables | | | | | |
| DelMonte Fresh Cut Green Beans | \$0.96 | 14.5 oz | 3.5 | \$0.27 | 1/2 cup |
| Private Label Cut Green Beans | \$0.42 | 14 oz | 3.5 | \$0.12 | 1/2 cup |
| Green Giant 50% Less Sodium Corn | \$1.00 | 15.25 oz | 3.5 | \$0.29 | 1/2 cup |
| Private Label No Salt Added Corn | \$0.68 | 15.25 oz | 3.5 | \$0.19 | 1/2 cup |
| Del Monte Fresh Cut Sliced Carrots | \$1.00 | 14.5 oz | 3.5 | \$0.29 | 1/2 cup |
| Private Label Cut Carrots | \$0.78 | 14.5 oz | 3.5 | \$0.22 | 1/2 cup |
| Frozen | | | | | |
| Birds Eye Frozen Spinach | \$1.34 | 10 oz | 3.5 | \$0.38 | 1/2 cup |
| Private Label Frozen Spinach | \$1.09 | 10 oz | 3.5 | \$0.31 | 1/2 cup |
| Canned Soup | | | | | |
| Campbell's Tomato Soup | \$0.80 | 10.75 oz | 2.5 | \$0.32 | 1 cup prep. |
| Campbell's 25% Less Sodium Tomato Soup | \$1.15 | 10.75 oz | 2.5 | \$0.46 | 1 cup prep. |
| Campbell's Healthy Request Tomato Soup | \$1.16 | 10.75 oz | 2.5 | \$0.46 | 1 cup prep. |
| Campbell's Vegetarian Vegetable Soup | \$1.09 | 10.75 oz | 2.5 | \$0.44 | 1 cup prep. |
| Campbell's Low Sodium Tomato with Tomato Pieces Soup | \$1.38 | 10.75 oz | 2 | \$0.69 | 1 can |

Pricing data from Information Resources Incorporated (IRI) – 52 weeks ending October 15, 2006. Price reflected is base price per unit not on promotion.

Table 3: Comparison of the nutrition of fruit and vegetable juices.

| Juice | Old Orchard Apple Juice | Welch's Grape Juice | ShopRite Orange Juice | V8 100% Vegetable Juice | Calcium Enriched V8 | Essential Antioxidants V8 | Lemon Twist V8 | Low Sodium V8 | Picante V8 | Campbell's Tomato Juice | Campbell's Healthy Request Tomato Juice | Campbell's Low Sodium Tomato Juice |
|-------------------------|-------------------------|---------------------|-----------------------|-------------------------|---------------------|---------------------------|----------------|---------------|------------|-------------------------|---|------------------------------------|
| Serving Size | 8 oz | 8 oz | 8 oz | 8 oz | 8 oz | 8 oz | 8 oz | 8 oz | 8 oz | 8 oz | 8 oz | 8 oz |
| Calories | 120 | 170 | 120 | 50 | 50 | 50 | 50 | 50 | 50 | 50 | 50 | 50 |
| Total Fat (g) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Saturated Fat (g) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Cholesterol (mg) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Sodium (mg) | 25 | 20 | 0 | 480 | 460 | 460 | 590 | 140 | 590 | 680 | 480 | 140 |
| Potassium (mg) | 280 | - | 450 | 470 | 680 | 700 | 470 | 820 | 470 | 430 | 500 | 920 |
| Total Carbohydrates (g) | 29 | 42 | 29 | 10 | 11 | 11 | 10 | 10 | 10 | 10 | 10 | 10 |
| Fiber (g) | 0 | 0 | 0 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 |
| Sugar (g) | 27 | 40 | 28 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 |
| Protein (g) | 0 | 0 | 1 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 |
| Vitamin A (%DV) | 0 | 0 | 0 | 40 | 40 | 100 | 40 | 40 | 40 | 10 | 100 | 10 |
| Vitamin C (%DV) | 130 | 100 | 120 | 120 | 120 | 120 | 120 | 120 | 120 | 120 | 120 | 120 |
| Calcium (%DV) | 10 | 0 | 2 | 4 | 30 | 4 | 4 | 2 | 4 | 2 | 2 | 2 |
| Iron (%DV) | 2 | 0 | 0 | 4 | 4 | 4 | 4 | 2 | 2 | 2 | 0 | 2 |
| Vitamin E (%DV) | - | - | - | 0 | 0 | 100 | 0 | 0 | 0 | 0 | 100 | 0 |
| Magnesium (%DV) | - | - | - | NYA | 10 | 10 | NYA | 10 | 4 | NYA | 4 | NYA |
| Thiamine (%DV) | - | - | 15 | - | - | - | - | - | - | - | - | - |
| Folate (%DV) | - | - | 10 | - | - | - | - | - | - | - | - | - |

NYA = Not yet available

Table 4: Nutrition of Campbell's Canned Beans in Sauce Options.

| Beans | Price per container | # of 1/2 cup servings | Serving Size | Price per 1/2 cup serving | Calories | Total Fat (g) | Saturated Fat (g) | Cholesterol (mg) | Sodium (mg) | Total Carbohydrate | Dietary Fiber (g) | Sugars (g) | Protein (g) | Vitamin A % DV | Vitamin C % DV | Calcium % DV | Iron % DV |
|---|---------------------|-----------------------|--------------|---------------------------|----------|---------------|-------------------|------------------|-------------|--------------------|-------------------|------------|-------------|----------------|----------------|--------------|-----------|
| Campbell's Baked Beans Brown Sugar and Bacon Flavored Beans | \$0.52 | 2.5 | 1/2 cup | \$0.21 | 160 | 2.5 | 0.5 | <5 | 470 | 30 | 8 | 13 | 5 | 0 | 0 | 4 | 8 |
| Campbell's Pork and Beans | \$0.49 | 2.5 | 1/2 cup | \$0.20 | 140 | 1.5 | 0.5 | <5 | 440 | 25 | 7 | 8 | 6 | 0 | 0 | 4 | 8 |
| Goya Red Kidney Beans | \$1.03 | 3.5 | 1/2 cup | \$0.29 | 90 | 1 | 0 | 0 | 350 | 19 | 8 | <1 | 7 | 0 | 0 | 4 | 10 |
| Private Label Garbanzo Beans | \$0.84 | 3.5 | 1/2 cup | \$0.24 | 143 | 1.5 | 0 | 0 | 309 | 27 | 5 | NA | 6 | 0 | 0 | 3 | 8 |

Pricing data from Information Resources Incorporated (IRI) – 52 weeks ending October 15, 2006. Price reflected is base price per unit not on promotion.

*Nutrition for PL Garbanzo beans is from USDA Standard Reference 19, accessed Nov. 3, 2006.

Table 5: Price and nutrition comparison between canned tuna, salmon, sardines and Swanson® canned chicken in water.

| Product | Price | Size of Package | # of ounces | Price per ounce | Per 2 oz serving | Calories | Total Fat (g) | Saturated Fat (g) | Cholesterol (mg) | Sodium (mg) | Total Carbohydrate (g) | Dietary Fiber (g) | Sugars (g) | Protein (g) | Vitamin A % DV | Vitamin C % DV | Calcium % DV | Iron % DV |
|---|--------|-----------------|-------------|-----------------|------------------|----------|---------------|-------------------|------------------|-------------|------------------------|-------------------|------------|-------------|----------------|----------------|--------------|-----------|
| Starkist Chunk Tuna in Water - Canned | \$1.12 | 6 oz | 6 | \$0.19 | 2 oz | 60 | 1 | 0 | 30 | 250 | 0 | 0 | 0 | 13 | - | - | - | - |
| Starkist Chunk Tuna in Water in Foil Pouch | \$1.26 | 3 oz | 3 | \$0.42 | 2 oz | 60 | 1 | 0 | 20 | 207 | 0 | 1 | 0 | 13 | 0 | 0 | 0 | 3 |
| Private Label Chunk Tuna in Water | \$0.63 | 6 oz | 6 | \$0.11 | 2 oz | 56 | 0 | 0 | 22 | 118 | 0 | 0 | 0 | 13 | 0 | 0 | 0 | 2 |
| Starkist Chunk Pink Salmon | \$1.96 | 6 oz | 6 | \$0.33 | 2 oz | 50 | 1 | 0 | 20 | 250 | 0 | 0 | 0 | 11 | 0 | 0 | 0 | 0 |
| Private Label Pink Salmon | \$1.36 | 7.5 oz | 7.5 | \$0.18 | 2 oz | 80 | 4 | 0.9 | 36 | 240 | 0 | 0 | 0 | 11 | 0 | 0 | 9 | 2 |
| Starkist Sardines | \$0.93 | 3.5 oz | 3.5 | \$0.27 | 2 oz | 69 | 4 | 1.1 | 20 | 194 | 0 | 0 | 0 | 7 | 0 | 0 | 6 | 1 |
| Swanson Premium White and Dark Chicken in Water | \$1.58 | 4.5 oz | 4.5 | \$0.35 | 2 oz | 50 | 1 | 0.5 | 20 | 270 | 1 | 0 | 1 | 10 | 0 | 0 | 0 | 0 |
| Swanson Premium White Chicken in Water | \$1.97 | 4.5 oz | 4.5 | \$0.44 | 2 oz | 60 | 2 | 0.5 | 30 | 250 | 1 | 0 | 0 | 10 | 0 | 0 | 0 | 0 |

Pricing data from Information Resources Incorporated (IRI) – 52 weeks ending October 15, 2006. Price reflected is base price per unit not on promotion.

NOV 06 2006

To: Patricia N. Daniels/USDA
From: Gary Troost
Re: Comments on the proposed rule for revisions in WIC food packages

I-121

Dear Ms Daniels:

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.

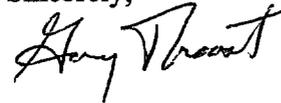
Thirdly, consider the nutritional benefit of water for digestion with meals as well as cleansing purposes. The missing third cup of daily milk may remove a beverage during mealtime or lessen the intake of bodily need for water. It seems everyone today either has a cell phone or bottle of water at hand.

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.

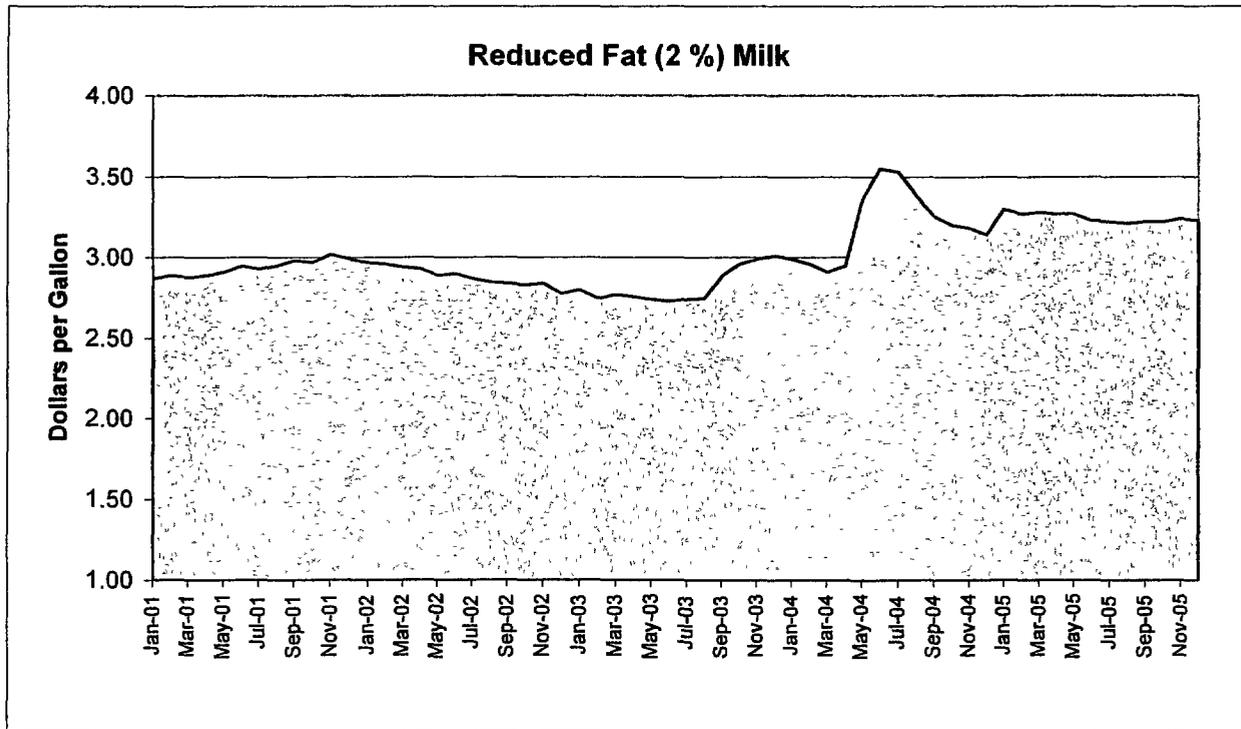
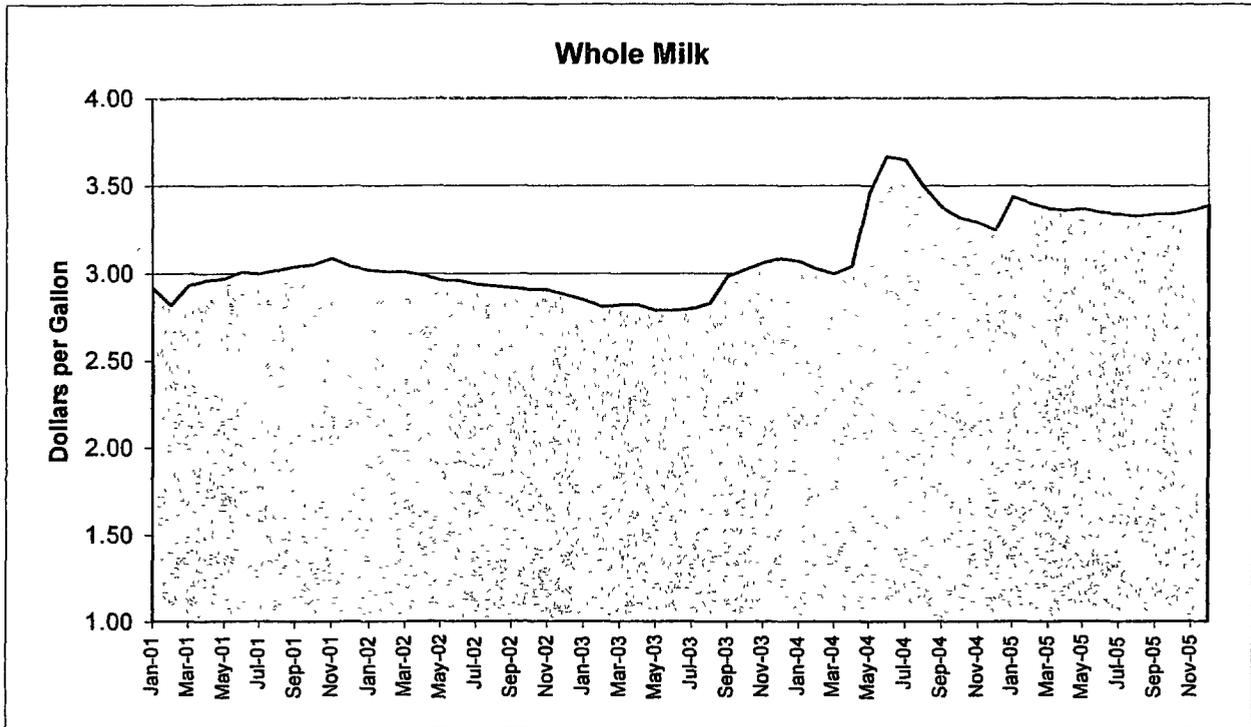
You have my permission to forward these comments to who ever may be concerned. I have never been to your part of this great nation, but I know my way around the west coast and the dairy industry and have fulfilled my promise to many producers and my family in corresponding with you regarding these matters.

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



WISCONSIN APPLE GROWERS ASSOCIATION

211 Canal Road ❖ Waterloo, WI 53594 ❖ 920-478-4277 ❖ FAX 920-478-9586 ❖ E-Mail office@waga.org

November 6, 2006

NOV - 6 2006

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

I-122

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

Dear Ms. Daniels:

The Wisconsin Apple Growers Association (WAGA), the Wisconsin Berry Growers Association and the Wisconsin Fresh Market Vegetable Growers Association are happy that we're able to submit comments regarding the United States Department of Agriculture's (USDA) proposal to update the food packages for the Special Supplemental Feeding Program for Women, Infants and Children (WIC).

These groups represent fresh market growers across Wisconsin and neighboring states who strive to provide fresh and nutritious produce to the region's citizens.

These groups strongly support the inclusion of fruits and vegetables in the WIC program. As proven by USDA's own recommendations, fruits and vegetables play a critical role in a healthy diet. For that reason, it is only consistent that fruits and vegetables be a part of this important program that gets healthy foods to those that need it most.

Since the majority of our growers communicate directly with their customers and can therefore provide them with valuable information on produce storage, preparation, variety and more, it only makes sense that these coupons should be acceptable at farmers' markets. Farmers can provide the added, valuable service of education to the WIC program.

Thank you for considering this enhancement to the program which will go great lengths in fighting poor eating habits.

Sincerely,

Anna Maenner, Executive Director
Wisconsin Apple Growers Association
Wisconsin Berry Growers Association
Wisconsin Fresh Market Vegetable Growers Association



Affiliated with ❖ U.S. Apple Association ❖ International Dwarf Fruit Tree Association ❖ Wisconsin Agribusiness Council