

11-02-06 email from kslack@mmimail.com

October 17, 2006

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

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

Dear Ms. Daniels:

I am writing to express Marketing Management Inc. (MMI) and its Private Label Customers' support for the proposed rule to change the Special Supplemental Nutrition Program for Women, Infants and Children Food Packages. The health and well-being of the nation's women, infants, and children is a priority of the MMI organization. The proposed changes will greatly benefit vulnerable mothers and children.

We are pleased that the proposed rule closely reflects the science-based recommendations of the Institute of Medicine (IOM) published in their April 2005 report entitled, *WIC Food Packages: Time for a Change*. The changes reflected in the Proposed Rule are also consistent with the *2005 Dietary Guidelines for Americans* and National Nutrition Guidance, including those from the American Academy of Pediatrics.

We agree that the changes in the proposed rule are a significant step forward and will improve the overall health of WIC mothers and children by contributing to reductions in obesity and other diet-related chronic diseases. In particular:

- We support adding fruits and vegetables to the food packages of women, infants and children while reducing the amount of fruit juice provided. Increased consumption of fruits and vegetables is associated with reduced risk for obesity and chronic diseases such as cancer, stroke, cardiovascular disease, and type 2 diabetes. Fruits and vegetables added to the diet also promote adequate intake of priority nutrients such as Vitamins A, C, folate, potassium and fiber.
- We support the quantities of dairy products and eggs offered in the proposed rule. These quantities meet the *2005 Dietary Guidelines for Americans*. We agree that alternative calcium sources such as soy beverage (soy milk) and tofu are necessary additions to the food packages to address milk protein allergy, lactose maldigestion, personal preferences, and cultural diversity of the WIC population.
- While we commend USDA's efforts in the Proposed Rule to support the initiation and duration of breastfeeding, we urge that there be *no* test period for the partially breastfeeding food packages for women and infants. We believe that deletion of the pilot phase would speed the implementation of these packages. For women who declare themselves as breastfeeding mothers, we urge that, consistent with the IOM recommendation, States should be given the option to establish criteria

under which infant formula may be provided in the first month.

- We urge to further support breastfeeding, that the cash-value vouchers for fruits and vegetables for fully breastfeeding women to be increased to \$10. We believe that this change would be cost-neutral, a significant incentive for breastfeeding mothers.
- We support the whole grain requirement for cereals and the introduction of whole grain bread and other whole grains such as corn tortillas and brown rice. Whole grain consumption is associated with;
  - 1). reducing the risk of coronary heart disease, type 2 diabetes, digestive system and hormone-related cancers,
  - 2). assisting in maintaining a healthy weight, and
  - 3). increasing the intake of dietary fiber.

However, we support this Proposed Rule with concerns.

Marketing Management Inc. and its Private Label Customers' has noted that the Proposed Rules would require, in addition to meeting past criteria to qualify for participation in the WIC program, breakfast cereals would in the future also have to contain not less than 51% whole grains as established by the test set forth in the FDA's "Health Claim Notification for Whole Grain Foods With Moderate Fat Content" ("Fiber Standard"). Such a wholesale adoption of a significant whole grain content standard would appear to be somewhat inconsistent with what the IOM has identified as the purposes being served by the Proposed Rules. We are concerned that such a standard, as proposed, could have unintended consequences and prove to be counter productive with respect to the total diets of WIC's participants.

The whole grain standard set forth in the Proposed Rules would seem to effectively permit participation in the WIC program by wheat and oat-based cereals only. Because of the limited inherent fiber content of corn and rice, corn and rice-based cereals would not meet the standard. Assuming the new whole grain requirement enunciated in the Proposed Rules would have the above consequence, we believe the following unfortunate effects on the WIC program:

1). Many consumers have a strong preference for corn and rice-based cereals, and some consumers have no interest in eating those made with wheat or oats. If the WIC program offered only wheat and oat-based cereals, it is possible that some participants will procure the available cereals but not consume them, perhaps choosing to give them to other persons. In doing so the significant nutrition delivered to consumers by the various breakfast cereals historically in the program would not be gained by such participants. (USDA appears to acknowledge this possible consequence of this proposed revision in the program at page 44850 of *Federal Register* Vol. 21, ND: 151.) Hispanics alone make up nearly 40% of the WIC population and have shown strong preferences for corn and rice-based products. (USDA makes note of this in a 2002 paper called "Hispanic American Influence on the US Food Industry.")

2). Some WIC participants may have food allergies to wheat and/or oats. Without corn and rice-based options available to them, they would be denied the opportunity to get the nutrition of breakfast cereals.

Marketing Management Inc and its Private Label Customers commend the USDA for the release of the proposed rule making major changes to the WIC food packages. This proposed rule makes the WIC food packages consistent with the *2005 Dietary Guidelines for Americans* and is a major step forward to improving the overall nutritional health and well-being of WIC mothers and children.

The proposed food packages will provide greater amounts of all of the priority nutrients currently identified as needed by the WIC population. They will supply a reliable and culturally acceptable source of supplemental nutritious foods as well as promote and support exclusive breastfeeding. Equally important, the proposals will provide WIC professionals with the necessary tools to reinforce the nutrition education messages and promote healthier food choices.

WIC is our nation's premier public health nutrition program. The long-term benefits of providing participants with fruits and vegetables, lower fat dairy products and whole grains, as well as additional incentives for fully breastfeeding women will greatly aid WIC in improving the life-long health of our most vulnerable women, infants and children.

Marketing Management Inc. and its customers urges publication of a final rule by the Spring of 2007 to assure timely implementation of the rule's invaluable changes.

Sincerely,

Kimberly Slack  
WIC Manager  
Marketing Management Inc.  
4717 Fletcher Avenue  
Fort Worth, TX 76107

email 11-03-06 from Bob Pawlowski [rpawlowski@afdf.org]



Alaska Fisheries Development Foundation, Inc.

I-168

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

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

Dear Ms. Daniels,

The Alaska Fisheries Development Foundation (*AFDF*) commends USDA's Food and Nutrition service for the proposed rule to revise regulations governing the WIC food package to align the WIC food packages with the 2005 Dietary Guidelines for Americans and current infant feeding practice guidelines of the American Academy of Pediatrics, better promote and support the establishment of successful long-term breastfeeding, provide WIC participants with a wider variety of food, and several other goals.

AFDF believes that the inclusion and authorization of canned salmon in the proposed WIC food package III and VII for women fully breastfeeding is a very positive enhancement of this food package. The inclusion of salmon is consistent with current recommendations and new scientific evidence that seafood consumption, especially fish that naturally contain more oil (e.g., salmon) that are higher in eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA), is desirable for the health of all population groups and life stages, which includes the unique nutritional needs of the WIC target population.

In addition to including canned salmon in packages III and VII women for who are fully breastfeeding up to 1 year postpartum, *AFDF* recommends the inclusion and authorization of canned salmon for all target groups under WIC Food Package III and IV (i.e., children 1 through 4 years of age), V (i.e., pregnant and partially breastfeeding women – up to 1 year postpartum), and VI (i.e., women, up to 6 months postpartum) because all of these food packages are intended for population groups that would benefit from increased intake of seafood with higher quantitative amounts of EPA/DHA. The tables with a full description of the proposed rule food packages can be found in Attachment A. Our rationale for this recommendation is described herein.

On October, 17, 2006, the Institute of Medicine (IOM) of the National Academies, Washington, D.C., released a report "Seafood Choices: Balancing Benefits and Risks," in which the IOM reviewed the evidence on the benefits and risks associated with seafood consumption to help consumers make informed choices and to make recommendations on ways to guide U.S. consumers in making appropriate selections.

In this report, the IOM identified many benefits related to seafood consumption and EPA and/or DHA intake during developmental stages (i.e., pregnancy and/or lactation, infancy and/or childhood) based on clinical trials and epidemiological studies. Some of the potential benefits included: increased duration of gestation; improved infant and child developmental outcomes; cognitive benefits for the children when they were 4 or 5 years of age; benefits for infant and child neurological development; and increased infant visual acuity.

Additionally, the IOM developed seafood consumption guidance for population groups based upon both the benefits and risks of contaminant exposure (e.g., exposure to methylmercury and other contaminants and pollutants in seafood). This guidance indicates that for females who are or may become pregnant or who are breastfeeding and children up to the age of 12 may benefit from consuming seafood, especially those with relatively higher concentrations of EPA and DHA with some limitations as to quantity consumed (i.e., up to 12 ounces/week and up to 6 ounces albacore tuna/week) and avoid large predatory fish (e.g., shark, swordfish, tilefish, or king mackerel). As compared to a many other varieties of seafood, salmon contains the least amount of methylmercury.

Among fish with high EPA/DHA content, salmon is included with those fish that have the highest concentration per serving. Canned salmon contains 0.718g (718mg) EPA (20:5 n-3) and 0.685g (685mg) DHA (22:6 n-3) per 3 ounce (85g) serving. Also, canned salmon contains a variety of other healthful nutrients, such as high-quality protein, calcium, selenium, niacin, vitamins B-6, B-12, and D. Several of these nutrients have been identified in the proposed rule as inadequate in the pregnant, lactating, and non-breastfeeding postpartum women (i.e., protein, calcium, niacin, and vitamin B-6). Saturated fat has been identified as a nutrient with excessive consumption among both children and women. Salmon contains lower amounts of saturated fat than many foods. Additionally, salmon contains only 118 calories per 3 ounce serving, which makes salmon a nutrient dense food. The nutrient content data referred to herein is based on the nutrition profile in Attachment B adapted from: *U.S. Department of Agriculture, Agricultural Research Service, 2006. USDA Nutrient Database for Standard Reference, Release 19.*

Finally, the addition of canned salmon would enhance the variety of foods offered to the WIC target groups and could positively influence life-long dietary choices for both the women and children in the program. *AFDF* can facilitate consumer consumption of canned salmon by providing to WIC a variety of economical, tasty salmon recipes that are easy to prepare by a culturally diverse population. *AFDF* on behalf of its members will also provide consumer education materials regarding the benefits of salmon and seafood in a healthful diet.

Respectfully,

**Signed Electronically – Robert J Pawlowski 11-03-06 @ 5:12 pm AST**

Robert J. Pawlowski

Executive Director  
Alaska Fisheries Development Foundation

Attached A&B

**Attachment A**

Federal Register/Vol. 71, No. 151, Monday, August 7, 2006/Proposed Rules at 44817 -44819

**TABLE 2.—MAXIMUM MONTHLY ALLOWANCES OF SUPPLEMENTAL FOODS FOR CHILDREN AND WOMEN IN FOOD PACKAGES IV, V, VI AND VII**

Foods <sup>1</sup>	Children	Women		
	Food package IV: 1 through 4 years	Food package V: Pregnant and partially breastfeeding (up to 1 year postpartum) <sup>2</sup>	Food package VI: Postpartum (up to 6 months postpartum) <sup>3</sup>	Food package VII: Fully breastfeeding (enhanced), (up to 1 year postpartum) <sup>4,5</sup>
Juice, single strength <sup>6</sup> .....	128 fl oz .....	144 fl oz .....	96 fl oz .....	144 fl oz.
Milk, fluid .....	16 qt <sup>7,8,9,10</sup> .....	22 qt <sup>7,8,11,12</sup> .....	16 qt <sup>7,8,11,12</sup> .....	24 qt <sup>7,8,11,12</sup>
Breakfast cereal .....	36 oz .....	36 oz .....	36 oz .....	36 oz.
Cheese .....	N/A .....	N/A .....	N/A .....	1 lb.
Eggs .....	1 dozen .....	1 dozen .....	1 dozen .....	2 dozen.
Fruits and vegetables <sup>13,14</sup> .....	\$6.00 in cash value vouchers.	\$8.00 in cash value vouchers.	\$8.00 in cash value vouchers.	\$8.00 in cash value vouchers.
Whole wheat bread or other whole grains <sup>15</sup> .....	2 lb .....	1 lb .....	N/A .....	1 lb.
Fish (canned) .....	N/A .....	N/A .....	N/A .....	30 oz.
Legumes, dry <sup>16</sup> .....	1 lb .....	1 lb .....	1 lb .....	1 lb.
And/or Peanut butter .....	Or 18 oz .....	And 18 oz .....	Or 18 oz .....	And 18 oz.

**TABLE 3.—MAXIMUM MONTHLY ALLOWANCES OF SUPPLEMENTAL FOODS FOR CHILDREN AND WOMEN IN FOOD PACKAGE III**

Foods <sup>1</sup>	Children	Women		
	1 through 4 years	Pregnant and partially breastfeeding (up to 1 year postpartum) <sup>2</sup>	Postpartum (up to 6 months postpartum) <sup>3</sup>	Fully breastfeeding (enhanced), (up to 1 year postpartum) <sup>4,5</sup>
Juice, single strength <sup>6</sup> .....	128 fl oz .....	144 fl. oz .....	96 fl. oz .....	144 fl. oz.
WIC Formula <sup>7,8</sup> .....	455 fl oz. liquid concentrate.	455 fl. oz. liquid concentrate.	455 fl. oz. liquid concentrate.	455 fl. oz. liquid concentrate.
Milk .....	16 qt <sup>9,10,11,12</sup> .....	22 qt <sup>9,10,11,14</sup> .....	16 qt <sup>9,10,11,14</sup> .....	24 qt <sup>9,10,11,14</sup>
Breakfast cereal <sup>15</sup> .....	36 oz .....	36 oz .....	36 oz .....	36 oz.
Cheese .....	N/A .....	N/A .....	N/A .....	1 lb.
Eggs .....	1 dozen .....	1 dozen .....	1 dozen .....	2 dozen.
Fruits and vegetables <sup>16,17</sup> .....	\$6.00 in cash value vouchers.	\$8.00 in cash value vouchers.	\$8.00 in cash value vouchers.	\$8.00 in cash value vouchers.
Whole wheat bread <sup>18</sup> .....	2 lb .....	1 lb .....	N/A .....	1 lb.
Fish (canned) .....	N/A .....	N/A .....	N/A .....	30 oz.
Legumes, dry <sup>19</sup> .....	1 lb .....	1 lb .....	1 lb .....	1 lb.
And/or Peanut butter .....	Or 18 oz .....	And 18 oz .....	Or 18 oz .....	And 18 oz.

# Attachment: B

## Fish, salmon, canned, solids with bone and liquid

Refuse: 0% USDA National Nutrient Database for Standard Reference, Release 19 (2006)

NDB No: 15084 (Nutrient values and weights are for edible portion)

Nutrient	Units	1.00 X 3 oz
		85g
<b>Proximates</b>		
Water	g	58.49
Energy	kcal	118
Energy	kJ	495
Protein	g	16.81
Total lipid (fat)	g	5.14
Ash	g	2.21
Carbohydrate, by difference	g	0.00
Fiber, total dietary	g	0.0
Sugars, total	g	0.00
<b>Minerals</b>		
Calcium, Ca	mg	181
Iron, Fe	mg	0.71
Magnesium, Mg	mg	29
Phosphorus, P	mg	280
Potassium, K	mg	277
Sodium, Na	mg	471
Zinc, Zn	mg	0.78
Copper, Cu	mg	0.087
Manganese, Mn	mg	0.017
Selenium, Se	mcg	28.2
<b>Vitamins</b>		
Vitamin C, total ascorbic acid	mg	0.0
Thiamin	mg	0.020
Riboflavin	mg	0.158
Niacin	mg	5.556
Pantothenic acid	mg	0.468
Vitamin B-6	mg	0.255
Folate, total	mcg	13
Folic acid	mcg	0
Folate, food	mcg	13
Folate, DFE	mcg_DFE	13
Vitamin B-12	mcg	3.74
Vitamin B-12, added	mcg	0.00
Vitamin A, IU	IU	48
Vitamin A, RAE	mcg_RAE	14
Retinol	mcg	14
Vitamin E (alpha-tocopherol)	mg	0.54
Vitamin E, added	mg	0.00
Tocopherol, beta	mg	0.00
Tocopherol, gamma	mg	0.00
Tocopherol, delta	mg	0.00
Vitamin D	IU	530
Vitamin K (phylloquinone)	mcg	0.3

<b>Lipids</b>		
Fatty acids, total saturated	g	1.305
4:0	g	0.000
6:0	g	0.000
8:0	g	0.000
10:0	g	0.000
12:0	g	0.000
14:0	g	0.041
16:0	g	1.148
18:0	g	0.115
Fatty acids, total monounsaturated	g	1.536
16:1 undifferentiated	g	0.396
18:1 undifferentiated	g	0.908
20:1	g	0.231
22:1 undifferentiated	g	0.015
Fatty acids, total polyunsaturated	g	1.742
18:2 undifferentiated	g	0.049
18:3 undifferentiated	g	0.049
18:4	g	0.115
20:4 undifferentiated	g	0.065
20:5 n-3	g	0.718
22:5 n-3	g	0.041
22:6 n-3	g	0.685
Cholesterol	mg	47
<b>Amino acids</b>		
Tryptophan	g	0.189
Threonine	g	0.737
Isoleucine	g	0.775
Leucine	g	1.367
Lysine	g	1.544
Methionine	g	0.498
Cystine	g	0.180
Phenylalanine	g	0.656
Tyrosine	g	0.568
Valine	g	0.866
Arginine	g	1.006
Histidine	g	0.495
Alanine	g	1.017
Aspartic acid	g	1.722
Glutamic acid	g	2.510
Glycine	g	0.807
Proline	g	0.594
Serine	g	0.686

I-169

email 11-03-06 from Bev Paul [bpaul@gordley.com]



12125 Woodcrest Executive Drive, Suite 100, St Louis, MO 63141, Phone (314) 576-1770, Fax (314) 576-2786  
Patricia Daniels, Director  
Supplemental Food Programs, FNS/USDA  
3101 Park Center Drive, Room 528  
Alexandria, VA 22302

Dear Ms. Daniels:

On behalf of the American Soybean Association (ASA), I appreciate the opportunity to provide comments regarding revisions to the WIC Food Packages Rule. ASA is a membership-driven, grassroots policy organization representing 25,000 producer-members on national issues important to U.S. soybean growers.

ASA strongly supports the inclusion of soyfoods in the WIC food package. The inclusion of tofu, soymilk and canned legumes provides flexibility to participants as well as economical and healthy sources of protein, calcium, fiber and other nutrients.

We are concerned with these provisions:

1. The proposed revisions require medical documentation for soymilk and tofu for children aged 1-4. ASA strongly disagrees with this requirement. Since participants in the program are low-income, the effect will be an insurmountable barrier for most WIC families.
2. The proposed revisions refer to soymilk as "soy beverage." This is not the commonly used name for this product and will cause confusion among participants.
3. The nutrient requirements for soymilk do not match current commercial levels. The proposed 8 grams of protein exceeds every soymilk on the market. The protein requirement should, if anything, match the FDA health claim serving size of 6.25 grams.

Additionally, the requirement to include additional nutrients, like potassium, at levels to match those of fluid milk makes sense only if milk is required to match all the nutrients found in soymilk, such as iron. Nutrient requirements should be revised to match commercially available soymilk.

We appreciate USDA's attention to these issues. Thank you.

Sincerely,

*Richard J. Ostlie*

Rick Ostlie  
President

I-170

SalmonFrom: Gordon Lindquist [gordon@akgen.com]  
Sent: Friday, November 03, 2006 8:10 PM  
To: WICHQ-SFPD  
Subject: Salmon-USDA(2)-24Oct06-.doc

Patricia N. Daniels

Director, Supplemental Food Programs Division

Food and Nutrition Service, USDA

3101 Park Center Drive, Room 528

Alexandria, Virginia 22302

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

Dear Ms. Daniels,

Alaska General Seafoods commends USDA's Food and Nutrition service for the proposed rule to revise regulations governing the WIC food package to align the WIC food packages with the 2005 Dietary Guidelines for Americans and current infant feeding practice guidelines of the American Academy of Pediatrics, better promote and support the establishment of successful long-term breastfeeding, provide WIC participants with a wider variety of food, and several other goals.

Alaska General Seafoods believes that the inclusion and authorization of canned salmon in the proposed WIC food package III and VII for women fully breastfeeding is a very

positive enhancement of this food package. The inclusion of salmon is consistent with current recommendations and new scientific evidence that seafood consumption, especially fish that naturally contain more oil (e.g., salmon) that are higher in eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA), is desirable for the health of all population groups and life stages, which includes the unique nutritional needs of the WIC target population.

In addition to including canned salmon in packages III and VII women for who are fully breastfeeding up to 1 year postpartum, Alaska General Seafoods recommends the inclusion and authorization of canned salmon for all target groups under WIC Food Package III and IV (i.e., children 1 through 4 years of age), V (i.e., pregnant and partially breastfeeding women – up to 1 year postpartum), and VI (i.e., women, up to 6 months postpartum) because all of these food packages are intended for population groups that would benefit from increased intake of seafood with higher quantitative amounts of EPA/DHA. The tables with a full description of the proposed rule food packages can be found in Attachment A. Our rationale for this recommendation is described herein.

On October, 17, 2006, the Institute of Medicine (IOM) of the National Academies, Washington, D.C., released a report “Seafood Choices: Balancing Benefits and Risks,” in which the IOM reviewed the evidence on the benefits and risks associated with seafood consumption to help consumers make informed choices and to make recommendations on ways to guide U.S. consumers in making appropriate selections.

In this report, the IOM identified many benefits related to seafood consumption and EPA and/or DHA intake during developmental stages (i.e., pregnancy and/or lactation, infancy and/or childhood) based on clinical trials and epidemiological studies. Some of the potential benefits included: increased duration of gestation; improved infant and child developmental outcomes; cognitive benefits for the children when they were 4 or 5 years of age; benefits for infant and child neurological development; and increased infant visual acuity.

Additionally, the IOM developed seafood consumption guidance for population groups based upon both the benefits and risks of contaminant exposure (e.g., exposure to methylmercury and other contaminants and pollutants in seafood). This guidance indicates that for females who are or may become pregnant or who are breastfeeding and children up to the age of 12 may benefit from consuming seafood, especially those with relatively higher concentrations of EPA and DHA with some limitations as to quantity consumed (i.e., up to 12 ounces/week and up to 6 ounces albacore tuna/week) and avoid

large predatory fish (e.g., shark, swordfish, tilefish, or king mackerel). As compared to a many other varieties of seafood, salmon contains the least amount of methylmercury.

Among fish with high EPA/DHA content, salmon is included with those fish that have the highest concentration per serving. Canned salmon contains 0.718g (718mg) EPA (20:5 n-3) and 0.685g (685mg) DHA (22:6 n-3) per 3 ounce (85g) serving. Also, canned salmon contains a variety of other healthful nutrients, such as high-quality protein, calcium, selenium, niacin, vitamins B-6, B-12, and D. Several of these nutrients have been identified in the proposed rule as inadequate in the pregnant, lactating, and non-breastfeeding postpartum women (i.e., protein, calcium, niacin, and vitamin B-6). Saturated fat has been identified as a nutrient with excessive consumption among both children and women. Salmon contains lower amounts of saturated fat than many foods. Additionally, salmon contains only 118 calories per 3 ounce serving, which makes salmon a nutrient dense food. The nutrient content data referred to herein is based on the nutrition profile in Attachment B adapted from: U.S. Department of Agriculture, Agricultural Research Service, 2006. USDA Nutrient Database for Standard Reference, Release 19.

Finally, the addition of canned salmon would enhance the variety of foods offered to the WIC target groups and could positively influence life-long dietary choices for both the women and children in the program.

Respectfully,

Gordon Lindquist

Vice President / General Manager

Alaska General Seafoods

6425 NE 175th Street

Kenmore, WA 98028

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Email: [gordon@akgen.com](mailto:gordon@akgen.com)

Attachment A

Federal Register/Vol. 71, No. 151, Monday, August 7, 2006/Proposed Rules at 44817 - 44819

Attachment: B

Fish, salmon, canned, solids with bone and liquid

Refuse: 0% USDA National Nutrient Database for Standard Reference, Release 19 (2006)

NDB No: 15084 (Nutrient values and weights are for edible portion)

Nutrient

Units

1.00 X 3 oz

-----

85g

Proximates

Water  
g  
58.49

Energy  
kcal  
118

Energy  
kj  
495

Protein  
g  
16.81

Total lipid (fat)  
g  
5.14

Ash  
g  
2.21

Carbohydrate, by difference  
g  
0.00

Fiber, total dietary  
g  
0.0

Sugars, total  
g  
0.00

Minerals

Calcium, Ca  
mg  
181

Iron, Fe

mg  
0.71

Magnesium, Mg  
mg  
29

Phosphorus, P  
mg  
280

Potassium, K  
mg  
277

Sodium, Na  
mg  
471

Zinc, Zn  
mg  
0.78

Copper, Cu  
mg  
0.087

Manganese, Mn  
mg  
0.017

Selenium, Se  
mcg  
28.2

Vitamins

Vitamin C, total ascorbic acid  
mg  
0.0

Thiamin  
mg  
0.020

Riboflavin  
mg  
0.158

Niacin  
mg  
5.556

Pantothenic acid  
mg  
0.468

Vitamin B-6  
mg  
0.255

Folate, total  
mcg  
13

Folic acid  
mcg  
0

Folate, food  
mcg  
13

Folate, DFE  
mcg\_DFE  
13

Vitamin B-12  
mcg  
3.74

Vitamin B-12, added  
mcg  
0.00

Vitamin A, IU  
IU  
48

Vitamin A, RAE

mcg\_RAE  
14

Retinol  
mcg  
14

Vitamin E (alpha-tocopherol)  
mg  
0.54

Vitamin E, added  
mg  
0.00

Tocopherol, beta  
mg  
0.00

Tocopherol, gamma  
mg  
0.00

Tocopherol, delta  
mg  
0.00

Vitamin D  
IU  
530

Vitamin K (phylloquinone)  
mcg  
0.3

## Lipids

Fatty acids, total saturated  
g  
1.305

4:0  
g  
0.000

6:0  
g  
0.000

8:0  
g  
0.000

10:0  
g  
0.000

12:0  
g  
0.000

14:0  
g  
0.041

16:0  
g  
1.148

18:0  
g  
0.115

Fatty acids, total monounsaturated

g  
1.536

16:1 undifferentiated

g  
0.396

18:1 undifferentiated

g  
0.908

20:1

g  
0.231

22:1 undifferentiated

g  
0.015

Fatty acids, total polyunsaturated

g  
1.742

18:2 undifferentiated

g  
0.049

18:3 undifferentiated

g  
0.049

18:4

g  
0.115

20:4 undifferentiated

g  
0.065

20:5 n-3

g  
0.718

22:5 n-3

g  
0.041

22:6 n-3

g  
0.685

Cholesterol

mg  
47

Amino acids

Tryptophan

g  
0.189

Threonine

g  
0.737

Isoleucine

g  
0.775

Leucine

g  
1.367

Lysine

g  
1.544

Methionine

g  
0.498

Cystine

g  
0.180

Phenylalanine

g  
0.656

Tyrosine

g  
0.568

Valine

g  
0.866

Arginine

g  
1.006

Histidine

g  
0.495

Alanine

g  
1.017

Aspartic acid

g  
1.722

Glutamic acid

g  
2.510

Glycine

g  
0.807

Proline

g  
0.594

Serine

g  
0.686

**email 11-03-06 from Aleutia [aleutia@arctic.net]**

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

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

Dear Ms. Daniels,

Aleutia Inc. commends USDA's Food and Nutrition service for the proposed rule to revise regulations governing the WIC food package to align the WIC food packages with the 2005 Dietary Guidelines for Americans and current infant feeding practice guidelines of the American Academy of Pediatrics, better promote and support the establishment of successful long-term breastfeeding, provide WIC participants with a wider variety of food, and several other goals.

*Aleutia Inc.* believes that the inclusion and authorization of canned salmon in the proposed WIC food package III and VII for women fully breastfeeding is a very positive enhancement of this food package. The inclusion of salmon is consistent with current recommendations and new scientific evidence that seafood consumption, especially fish that naturally contain more oil (e.g., salmon) that are higher in eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA), is desirable for the health of all population groups and life stages, which includes the unique nutritional needs of the WIC target population.

In addition to including canned salmon in packages III and VII women for who are fully breastfeeding up to 1 year postpartum, *Aleutia Inc.* recommends the inclusion and authorization of canned salmon for all target groups under WIC Food Package III and IV (i.e., children 1 through 4 years of age), V (i.e., pregnant and partially breastfeeding women – up to 1 year postpartum), and VI (i.e., women, up to 6 months postpartum) because all of these food packages are intended for population groups that would benefit from increased intake of seafood with higher quantitative amounts of EPA/DHA. The tables with a full description of the proposed rule food packages can be found in Attachment A. Our rationale for this recommendation is described herein.

On October, 17, 2006, the Institute of Medicine (IOM) of the National Academies, Washington, D.C., released a report "Seafood Choices: Balancing Benefits and Risks," in which the IOM reviewed the evidence on the benefits and risks associated with seafood consumption to help consumers make informed choices and to make recommendations on ways to guide U.S. consumers in making appropriate selections.

In this report, the IOM identified many benefits related to seafood consumption and EPA and/or DHA intake during developmental stages (i.e., pregnancy and/or lactation, infancy

and/or childhood) based on clinical trials and epidemiological studies. Some of the potential benefits included: increased duration of gestation; improved infant and child developmental outcomes; cognitive benefits for the children when they were 4 or 5 years of age; benefits for infant and child neurological development; and increased infant visual acuity.

Additionally, the IOM developed seafood consumption guidance for population groups based upon both the benefits and risks of contaminant exposure (e.g., exposure to methylmercury and other contaminants and pollutants in seafood). This guidance indicates that for females who are or may become pregnant or who are breastfeeding and children up to the age of 12 may benefit from consuming seafood, especially those with relatively higher concentrations of EPA and DHA with some limitations as to quantity consumed (i.e., up to 12 ounces/week and up to 6 ounces albacore tuna/week) and avoid large predatory fish (e.g., shark, swordfish, tilefish, or king mackerel). As compared to many other varieties of seafood, salmon contains the least amount of methylmercury.

Among fish with high EPA/DHA content, salmon is included with those fish that have the highest concentration per serving. Canned salmon contains 0.718g (718mg) EPA (20:5 n-3) and 0.685g (685mg) DHA (22:6 n-3) per 3 ounce (85g) serving. Also, canned salmon contains a variety of other healthful nutrients, such as high-quality protein, calcium, selenium, niacin, vitamins B-6, B-12, and D. Several of these nutrients have been identified in the proposed rule as inadequate in the pregnant, lactating, and non-breastfeeding postpartum women (i.e., protein, calcium, niacin, and vitamin B-6). Saturated fat has been identified as a nutrient with excessive consumption among both children and women. Salmon contains lower amounts of saturated fat than many foods. Additionally, salmon contains only 118 calories per 3 ounce serving, which makes salmon a nutrient dense food. The nutrient content data referred to herein is based on the nutrition profile in Attachment B adapted from: *U.S. Department of Agriculture, Agricultural Research Service, 2006. USDA Nutrient Database for Standard Reference, Release 19.*

Finally, the addition of canned salmon would enhance the variety of foods offered to the WIC target groups and could positively influence life-long dietary choices for both the women and children in the program.

*Aleutia is a small fisherman owned salmon processing company in SouthWest Alaska. It would be a great asset to both us and other locally owned salmon companies that this program includes canned salmon.*

Respectfully,

William E. Cumberlidge- Project Manager  
*Aleutia Inc.*  
*PO Box 408*  
*Sand Point, AK 99661- 0408*  
*Phone (907) 383-5909*  
*Fax (907) 383-2017*

# Attachment A

Federal Register/Vol. 71, No. 151, Monday, August 7, 2006/Proposed Rules at 44817 - 44819

TABLE 2.—MAXIMUM MONTHLY ALLOWANCES OF SUPPLEMENTAL FOODS FOR CHILDREN AND WOMEN IN FOOD PACKAGES IV, V, VI AND VII

Foods <sup>1</sup>	Children	Women		
	Food package IV: 1 through 4 years	Food package V: Pregnant and partially breastfeeding (up to 1 year postpartum) <sup>2</sup>	Food package VI: Postpartum (up to 6 months postpartum) <sup>3</sup>	Food package VII: Fully breastfeeding (enhanced), (up to 1 year postpartum) <sup>4,5</sup>
Juice, single strength <sup>6</sup> .....	128 fl oz .....	144 fl oz .....	96 fl oz .....	144 fl oz.
Milk, fluid .....	16 qt <sup>7,8,9,10</sup> .....	22 qt <sup>7,8,11,12</sup> .....	16 qt <sup>7,8,11,12</sup> .....	24 qt <sup>7,8,11,12</sup>
Breakfast cereal .....	36 oz .....	36 oz .....	36 oz .....	36 oz.
Cheese .....	N/A .....	N/A .....	N/A .....	1 lb.
Eggs .....	1 dozen .....	1 dozen .....	1 dozen .....	2 dozen.
Fruits and vegetables <sup>13,14</sup>	\$6.00 in cash value vouchers.	\$8.00 in cash value vouchers.	\$8.00 in cash value vouchers.	\$8.00 in cash value vouchers.
Whole wheat bread or other whole grains <sup>15</sup> .	2 lb .....	1 lb .....	N/A .....	1 lb.
Fish (canned) .....	N/A .....	N/A .....	N/A .....	30 oz.
Legumes, dry <sup>16</sup> .....	1 lb .....	1 lb .....	1 lb .....	1 lb.
And/or Peanut butter .....	Or 18 oz .....	And 18 oz .....	Or 18 oz .....	And 18 oz.

TABLE 3.—MAXIMUM MONTHLY ALLOWANCES OF SUPPLEMENTAL FOODS FOR CHILDREN AND WOMEN IN FOOD PACKAGE III

Foods <sup>1</sup>	Children	Women		
	1 through 4 years	Pregnant and partially breastfeeding (up to 1 year postpartum) <sup>2</sup>	Postpartum (up to 6 months postpartum) <sup>3</sup>	Fully breastfeeding (enhanced), (up to 1 year postpartum) <sup>4,5</sup>
Juice, single strength <sup>6</sup> .....	128 fl. oz .....	144 fl. oz .....	96 fl. oz .....	144 fl. oz.
WIC Formula <sup>7,8</sup> .....	455 fl. oz. liquid concentrate.	455 fl. oz. liquid concentrate.	455 fl. oz. liquid concentrate.	455 fl. oz. liquid concentrate.
Milk .....	16 qt <sup>9,10,11,12</sup> .....	22 qt <sup>9,10,13,14</sup> .....	16 qt <sup>9,10,13,14</sup> .....	24 qt <sup>9,10,13,14</sup>
Breakfast cereal <sup>15</sup> .....	36 oz .....	36 oz .....	36 oz .....	36 oz.
Cheese .....	N/A .....	N/A .....	N/A .....	1 lb.
Eggs .....	1 dozen .....	1 dozen .....	1 dozen .....	2 dozen.
Fruits and vegetables <sup>14,17</sup>	\$6.00 in cash value vouchers.	\$8.00 in cash value vouchers.	\$8.00 in cash value vouchers.	\$8.00 in cash value vouchers.
Whole wheat bread <sup>18</sup> .....	2 lb .....	1 lb .....	N/A .....	1 lb.
Fish (canned) .....	N/A .....	N/A .....	N/A .....	30 oz.
Legumes, dry <sup>19</sup> .....	1 lb .....	1 lb .....	1 lb .....	1 lb.
And/or Peanut butter .....	Or 18 oz .....	And 18 oz .....	Or 18 oz .....	And 18 oz.

**Attachment: B**

**Fish, salmon, canned, solids with bone and liquid**

Refuse: 0% USDA National Nutrient Database for Standard Reference, Release 19 (2006)

NDB No: 15084 (Nutrient values and weights are for edible portion)

Nutrient	Units	1.00 X 3 oz
		85g
<b>Proximates</b>		
Water	g	58.49
Energy	kcal	118
Energy	kJ	495
Protein	g	16.81
Total lipid (fat)	g	5.14
Ash	g	2.21
Carbohydrate, by difference	g	0.00
Fiber, total dietary	g	0.0
Sugars, total	g	0.00
<b>Minerals</b>		
Calcium, Ca	mg	181
Iron, Fe	mg	0.71
Magnesium, Mg	mg	29
Phosphorus, P	mg	280
Potassium, K	mg	277
Sodium, Na	mg	471
Zinc, Zn	mg	0.78
Copper, Cu	mg	0.087
Manganese, Mn	mg	0.017
Selenium, Se	mcg	28.2
<b>Vitamins</b>		
Vitamin C, total ascorbic acid	mg	0.0
Thiamin	mg	0.020
Riboflavin	mg	0.158
Niacin	mg	5.556
Pantothenic acid	mg	0.468
Vitamin B-6	mg	0.255
Folate, total	mcg	13
Folic acid	mcg	0
Folate, food	mcg	13
Folate, DFE	mcg_DFE	13
Vitamin B-12	mcg	3.74
Vitamin B-12, added	mcg	0.00
Vitamin A, IU	IU	48
Vitamin A, RAE	mcg_RAE	14
Retinol	mcg	14
Vitamin E (alpha-tocopherol)	mg	0.54
Vitamin E, added	mg	0.00
Tocopherol, beta	mg	0.00
Tocopherol, gamma	mg	0.00
Tocopherol, delta	mg	0.00
Vitamin D	IU	530
Vitamin K (phylloquinone)	mcg	0.3

<b>Lipids</b>		
Fatty acids, total saturated	g	1.305
4:0	g	0.000
6:0	g	0.000
8:0	g	0.000
10:0	g	0.000
12:0	g	0.000
14:0	g	0.041
16:0	g	1.148
18:0	g	0.115
Fatty acids, total monounsaturated	g	1.536
16:1 undifferentiated	g	0.396
18:1 undifferentiated	g	0.908
20:1	g	0.231
22:1 undifferentiated	g	0.015
Fatty acids, total polyunsaturated	g	1.742
18:2 undifferentiated	g	0.049
18:3 undifferentiated	g	0.049
18:4	g	0.115
20:4 undifferentiated	g	0.065
20:5 n-3	g	0.718
22:5 n-3	g	0.041
22:6 n-3	g	0.685
Cholesterol	mg	47
<b>Amino acids</b>		
Tryptophan	g	0.189
Threonine	g	0.737
Isoleucine	g	0.775
Leucine	g	1.367
Lysine	g	1.544
Methionine	g	0.498
Cystine	g	0.180
Phenylalanine	g	0.656
Tyrosine	g	0.568
Valine	g	0.866
Arginine	g	1.006
Histidine	g	0.495
Alanine	g	1.017
Aspartic acid	g	1.722
Glutamic acid	g	2.510
Glycine	g	0.807
Proline	g	0.594
Serine	g	0.686

1-173

**GRAIN FOODS FOUNDATION**

490 Bear Cub Drive  
Ridgway, CO 81432  
Telephone: 970-626-5183  
Fax: 970-626-5184

October 23, 2006

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

**RE: Docket No. 0584-AD77; WIC Food Packages Rule**

Dear Ms. Daniels:

The Grain Foods Foundation is a not-for-profit trade association whose 118 members come from the milling and baking industry and our allied companies and associations. Our mission is to make the consumer aware of the value of grain foods in a balanced diet, coupled with physical activity.

We are delighted that the WIC program has chosen to add whole grain products to the list of products that may be purchased through the program. *We understand this is a supplemental program and that many of the participants can afford to buy enriched products on their own to secure the necessary folic acid to help prevent neural tube birth defects.*

While the 2005 Dietary Guidelines for Americans promote the need to consume at least three one-ounce equivalents of whole grains daily, it is important to note there is no certain level that has been proven to reduce the risk of various diseases. As little as one serving of whole grain per day has been shown to be effective in some studies for reducing risk of chronic disease as per the Harvard Nurses' Health Study (Liu et al, 2000) and the male physicians study (Liu et al, 2003). Furthermore, consuming three servings per day of whole grain have been shown to decrease risk as in the Nurses' Health Study (Liu et al, 1999; 2000). In addition, women with the highest whole grain consumption have been shown to weigh less and gain less weight over time (Liu et al, 2003).

It is important that we do **not** send a message to consumers that **ONLY** 100% whole grain products are acceptable. Several studies have show that the decrease in risk reduction is not significantly affected by the whole grain content of the foods consumed, **but by the total combined amount** (Koh-Banerjee, 2004; Jensen, 2004).



GRAIN FOODS FOUNDATION

**TRUSTEES**

**J. Breck Barton**  
Cereal Food Processors

**Don L. Brown**  
ConAgra Food Ingredients Co.

**Gary L. Cain**  
Allied Trades of the Baking Industry

**Patrick Callaghan**  
Pepperidge Farm, Inc.

**Mike Gude**  
BEMA. The baking industry suppliers association

**Joel Crowder**  
The Kroger Company

**Martha E. Hernandez**  
Grupo Bimbo

**James R. Munyon**  
American Institute of Baking

**Gary J. Prince**  
Weston Foods, Inc.

**Joseph M Schwebel**  
Schwebel Baking Co., Inc.

**Guy R. Shoemaker**  
Horizon Milling LLC/Cargill

**Richard C. Siemer**  
Siemer Milling Company

**Charles B. Stout**  
Milner Milling, Inc.

**Honorary Ex-Officios:**

**George E. Deese**  
Flowers Foods

**John Gillcrist**  
Bartlett Milling Company

**Judi Adams, President**  
Judi Adams@grainsfoundation.org

Therefore, we recommend that a serving contain at least 8 grams of whole grain per serving. While we believe products containing at least 5 grams (10 percent of the recommended daily intake) should be labeled as such for the general public, we realize that the WIC population may only consume the WIC-provided whole grain products. Therefore, it is more important that their whole grain consumption is from foods with higher whole grain content.

The WIC proposal and IOM recommendation differ in their recommendations for bread and cereal. IOM recommendation of **51 percent of grain in the product** differs from the FDA Whole Grain health claim of **51 percent of product weight be from whole grain** and we believe the IOM recommendation is more logical because the product availability is so much larger with this standard. However, we would like to recommend that instead of either of the "51 percent" recommendations, we suggest using a minimum of 8 grams of whole grain per labeled serving size. This level would be equal to approximately a ½ serving of whole grain. Incremental consumption of whole grains can add up to a beneficial amount, as do all nutrients and calories.

In addition, we must always consider the sustainability of including whole grain products in their diets as the participants "graduate" from the program. Products containing less than 100 percent whole grains are usually less expensive and therefore, might be more practical in a long-term effort to encourage whole grain consumption.

We also recommend that you **allow all whole grains in the WIC program**, such as: Whole grain cornmeal, whole bulgur wheat, oatmeal (whole grain oats), whole wheat flour, whole brown rice, whole cracked wheat, whole wheat durum flour (pasta), wild rice and whole grain barley flakes. While amaranth, buckwheat and quinoa are more expensive, they are pseudo-cereals (having similar whole grain benefits) and in an effort to be culturally sensitive, these products may have merit in the program for some immigrants.

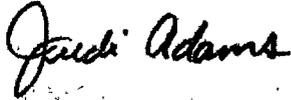
We also propose that the WIC rules include all soft (not fried) whole grain tortillas instead of just whole wheat and corn. We are concerned that WIC is allowing tortillas only if they are made with no added fats. While corn has sufficient inherent oil to meet this standard, wheat tortillas and multigrain tortillas need added fat to make a product that is edible. Fat is important for processing (dough flow/mobility) and for storage stability (helps with rollability and minimizes cracking). A wider selection of tortillas will allow more consumers to eat more whole grains.

The specification of a "pound" or "two pounds" of breads is not practical as **most loaves of whole grain breads are 24 ounces**. This distinction from white bread would cause problems with redemption and with the desired consumption of whole grain bread. Therefore, **we recommend that the specifications are for "up to or equal to 24 ounces" of bread or bread equivalents**. We also recommend that **all women in the WIC program be allowed the same amount of bread as children** and in this case, two (24 ounce) loaves of bread or the equivalent substitution of other whole grain products as women certainly need more servings than children.

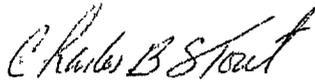
**Grain Foods Foundation Comments: Docket No. 0584-AD77  
WIC Food Packages Rule, October 23, 2006. Page 3.**

Thank you for the opportunity to provide these comments for your consideration of the newly proposed WIC program. We believe our recommendations will help achieve the goal of WIC participants to "make half your grains whole."

Sincerely,



Judi Adams, MS, RD  
President



Charles Stout, President, Milner Milling  
Grain Foods Foundation Co-Chair



Joel Crowder, Director of Marketing, Bakery Group  
The Kroger Co., Grain Foods Foundation Co-Chair

**References:**

Liu S, Manson JE, Stampfer MJ, Hu FB, Giovannucci E, Colditz GA, Hennekens CH, Willett WC. A prospective study of whole-grain intake and risk of type 2 diabetes mellitus in US women. *Am J Public Health.* 2000 Sep; 90(9):1409-15.

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Liu S, Stampfer MJ, Hu FB, Giovannucci E, Rimm E, Manson JE, Hennekens CH, Willett WC. Whole-grain consumption and risk of coronary heart disease: results from the Nurses' Health Study. *Am J Clin Nutr.* 1999 Sep; 70(3):412-9.

Liu S, Willett WC, Manson JE, Hu FB, Rosner B, Colditz G. Relation between changes in intakes of dietary fiber and grain products and changes in weight and development of obesity among middle-aged women. *Am J Clin Nutr.* 2003 Nov; 78(5):920-7.

Koh-Banerjee P, Franz M, Sampson L, Liu S, Jacobs DR Jr, Spiegelman D, Willett W, Rimm E. Changes in whole-grain, bran, and cereal fiber consumption in relation to 8-y weight gain among men. *Am J Clin Nutr.* 2004 Nov; 80(5):1237-45.

Jensen MK, Koh-Banerjee P, Hu FB, Franz M, Sampson L, Gronbaek M, Rimm EB. Intakes of whole grains, bran, and germ and the risk of coronary heart disease in men. *Am J Clin Nutr.* 2004 Dec; 80(6):1492-9.

I-175

From: WebMaster@fns.usda.gov  
Sent: Wednesday, November 01, 2006 1:27 PM  
To: WICHQ-SFPD  
Subject: RevisionstoWICFoodPackages-Proposed Rule

NAME: Cheryl Beyeler  
EMAIL: cbeyeler@adelphia.net  
CITY: Augusta  
STATE: ME  
ORGANIZATION: Maine Dairy & Nutrition Council/Maine Dairy Promotion Board  
CATEGORY: Industry  
OtherCategory:  
Date: November 01, 2006  
Time: 01:27:15 PM

COMMENTS:

To Whom It May Concern,

Dairy products have always been a major part of the WIC food package and currently the program provides about \$1.4 billion a year in dairy foods to WIC clients. Milk and dairy products offer a unique nutritnet package that supplies priority nutrients identified by the Institute of Medicine, as well as the critical nutrient calcium as addressed and recommended by the American Academy of Pedetric in their recent calcium position statement.

The USDA proposes across-the-board reduction in the amount of milk provided WIC clients, down to age appropriate Dietary Guidelines Allowance servings for children and most women, which is 3 cups milk for most women, and 2 for children 1 through 4 years old. The USDA proposed changes will reduce WIC clients access to dairy products through the program, and likely reduce the overall consumption of the critical nutrients found in fluid milk and other dairy products, as well as limiting milk to 2% fat or less for women and children two and older.

Sincerely,  
Cheryl Beyeler,CFCS  
Executive Director  
Maine Dairy Promotion Board  
Maine Dairy & Nutriton Council

I-177

11/03/06 email from  
Dave & Pam Bolin  
30707 180th St.  
Clarksville, IA 50619

[dybolin@butler-bremer.com](mailto:dybolin@butler-bremer.com)

As a Swiss Valley Farms dairy producer, I would like to share my thoughts on the WIC revisions. Thanks, Pam

To Whom It May Concern:

I am writing to express concern about the proposed changes in WIC. As a mom myself, I have a great interest in the health of our nation's children. WIC participants should be allowed to have access to the best nutritional dense foods.

Milk has been a core component of the WIC food packages since the program began. Milk and dairy products provided the components of a healthy diet for all Americans. Milk contains nine essential nutrients, including calcium, phosphorus, potassium, protein and vitamins A, D, B12, riboflavin, and niacin. Included among these are three key nutrients low in the diets of WIC-eligible women -- calcium, potassium and magnesium.

Two reports published in 2006 by the American Academy of Pediatrics (AAP), including "Optimizing Bone Health and Calcium Intakes of Infants, Children, and Adolescents" and "Lactose Intolerance in Infants, Children and Adolescents," emphasize the importance of adequate dairy intake to meet calcium recommendations, including for children with lactose intolerance. AAP recommends 3 servings of low-fat milk, cheese or yogurt to help children meet calcium requirements, and provides strategies for dairy consumption for those with lactose intolerance to ensure nutrient needs are met. Keeping 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.

**I hope that you will rely on well-established nutrition science, which supports increasing the availability of dairy options to help WIC participants better meet their dietary needs.**

Thanks you for your time.

Pam Bolin

I-178

11-03-06 email from Harrison, Steve [sharrison@bushbros.com]

November 2, 2006

Via Electronic Mail to [WICHQ-SFPD@fns.usda.gov](mailto:WICHQ-SFPD@fns.usda.gov)

Patricia N. Daniels  
WIC Director, FNS/USDA  
3101 Park Center Drive, Room 528  
Alexandria, VA 22302

**RE: Docket ID 0584-AD77; WIC Food Packages Rule**

Bush Brothers and Company submits the following comments regarding the rule changes proposed for WIC Food Packages by the USDA's Food and Nutrition Service (FNS) on the docket referenced above. As background, Bush Brothers is a leading U.S.-based manufacturer and canner of processed beans and vegetables.

USDA's FNS proposed changes to the WIC food packages are the first such changes in many years. This review of the WIC food packages presents an excellent opportunity to address Congress' goal of preventing the occurrence of health problems and improve the health status of some of our nation's most vulnerable families. We would like to comment on the following elements of the proposed food packages:

***Canned Beans and Peas (mature legumes):***

***Bush Brothers supports USDA's recommendation to allow canned beans and peas, in addition to dried, in WIC food packages. Moreover, the amount of canned beans proposed provides equivalency to dried beans. As support:***

This proposed change provides WIC participants with a wider variety of bean products that better meet consumer preferences and their increasing need for convenience. Recent research shows that nearly 2 ½ times more households buy canned beans than buy dry beans. (Source: A.C. Nielsen Homescan, 52 weeks ending 12/31/05.)

This proposed change supports the intentions of the *2005 Dietary Guidelines for Americans*, which recommends that Americans triple their current consumption of beans. The addition of canned beans to the WIC food packages makes it easier, and thus more likely, that WIC participants will choose beans, and thus, follow the intentions of the *2005 Dietary Guidelines*. According to FNS's estimates, bean utilization is expected to

increase by approximately 2.5 times if canned beans are allowed in the WIC program (Table 16: 71 Federal Register 44851.) Bush Brothers commends FNS for developing these proposed changes, because they align with the USDA's dietary recommendations.

Offering additional options in WIC for bean consumption also addresses the food preferences of the changing WIC population. WIC participants are increasingly diverse and the food choices available need to represent this, if the program is to achieve the nutritional objectives of the program. Canned beans are an important food choice to Hispanic households. Research shows that US-based Hispanic households consume 3.5 times more canned pinto beans than the average US household. (Source: AC Nielsen Homescan, 52 weeks ending 12/31/05.)

The addition of canned beans provide WIC participants with additional, and convenient, ways to meet IOM-cited "nutrients of concern" for the WIC population, such as folic acid and dietary fiber. Beans are a good source of folic acid and an excellent source of dietary fiber. In a recent analysis of the 1999-2002 National Nutrition and Health Examination Survey (NHANES), children who consumed beans had greater nutrient intake levels, including higher intake of protein, dietary fiber, potassium, magnesium, and total folate (Source: Fulgoni, Victor and Papanikolaou, Yanni. "Bean Consumption is Associated with Better Nutrient Intake and Lower Body Weights and Waist Circumferences in Children." Poster presented at Experimental Biology Conference, April 1-5, 2006, and sponsored by Bush Brothers & Company.)

One of the most discussed public health concerns relating to children today is childhood obesity. The number of obese children is growing at alarming rates, and obese children now have diseases like type 2 diabetes that used to be more common in adults. Further, overweight kids tend to become overweight adults, continuing to put them at greater risk for heart disease, high blood pressure and stroke. Indeed, the WIC population is most at risk for childhood obesity and faces the most difficult challenges to living a healthy lifestyle.<sup>1</sup> Offering additional options to increase bean consumption, through the addition of canned beans, gives children and their mothers new options to eat a food that is nutritionally (but not calorie) dense. In a recent analysis of the 1999-2002 National Nutrition and Health Examination Survey (NHANES), the likelihood of all children who consumed beans of being at risk for being overweight nearly approached significance, revealing a trend for a lower risk (odds ratio, 95%CI: 0.68, 0.44-1.05, p=0.077). (Source: Fulgoni, Victor and Papanikolaou, Yanni. "Bean Consumption is Associated with Better Nutrient Intake and Lower Body Weights and Waist Circumferences in Children." Poster presented at Experimental Biology Conference, April 1-5, 2006, and sponsored by Bush Brothers & Company.)

---

<sup>1</sup> "Fit WIC: Programs to Prevent Childhood Overweight in Your Community," Special Nutrition Program Report Series, No. WIC-05-FW, Project Officer: Ed Herzog. U.S. Department of Agriculture, Food and Nutrition Service, Office of Analysis, Nutrition, and Evaluation, Alexandria, VA:2005.

### ***Fruits and Vegetables***

***Bush Brothers and Company supports the addition of fruits and vegetables in WIC food packages and the equal distinction between fresh, canned, and frozen (and dried, when applicable) options.*** Despite the increasing nutritional importance attributed to fruit and vegetable consumption, it is alarming that the percentage of in-home dinner meals including a vegetable has declined from 47.7% in 1985 to 35.7% in 2006. (Source: The NPD Group's national Eating Trends Report, 2006.)

Because of program needs for optimal nutrition, however, we oppose the reduction in value from \$10 to \$8 for women, and \$8 to \$6 for children, from the IOM recommendation.

Fruits and vegetable choices are important options for WIC participants. Because of preferences, cultural norms, time of year, distance to redeem WIC vouchers, and storage facilities, canned options may more consistently deliver desired nutrients and dietary fiber to WIC participants and result in less waste.

In addition to USDA's proposed fruit and vegetable requirements, Bush Brothers believes that, as per the 2005 Dietary Guidelines, small amounts of added fat or sugar as sauces (particularly for vegetables) will increase palatability among participants, not increase cost, and will foster increased life-long fruit and vegetable consumption.

### **Summary**

We support the value of the WIC program as well as support the addition of canned beans and fruits and vegetables to the revised WIC food packages. Thank you for this opportunity to comment on this important issue.

Sincerely,

Steve Harrison  
Vice President, Regulatory Affairs  
Bush Brothers & Company  
1016 E. Weisgarber Road  
Knoxville, TN 37909  
(865) 558-5461

email 11-03-06 from Jeff Berger [dcep@ptialaska.net]



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

Re. Docket ID Number 0584-AD77, WIC Food Packages Rule

Dear Ms. Daniels,

Deep Creek Custom Packing, Inc commends USDA's Food and Nutrition service for the proposed rule to revise regulations governing the WIC food package to align the WIC food packages with the 2005 Dietary Guidelines for Americans and current infant feeding practice guidelines of the American Academy of Pediatrics, better promote and support the establishment of successful long-term breastfeeding, provide WIC participants with a wider variety of food, and several other goals.

Deep Creek Custom Packing believes that the inclusion and authorization of canned salmon in the proposed WIC food package III and VII for women fully breastfeeding is a very positive enhancement of this food package. The inclusion of salmon is consistent with current recommendations and new scientific evidence that seafood consumption, especially fish that naturally contain more oil (e.g., salmon) that are higher in eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA), is desirable for the health of all population groups and life stages, which includes the unique nutritional needs of the WIC target population.

In addition to including canned salmon in packages III and VII women for who are fully breastfeeding up to 1 year postpartum, Deep Creek Custom Packing recommends the inclusion and authorization of canned salmon for all target groups under WIC Food Package III and IV (i.e., children 1 through 4 years of age), V (i.e., pregnant and partially breastfeeding women – up to 1 year postpartum), and VI (i.e., women, up to 6 months postpartum) because all of these food packages are intended for population groups that would benefit from increased intake of seafood with higher quantitative amounts of EPA/DHA. The tables with a full description of the proposed rule food packages can be found in Attachment A. Our rationale for this recommendation is described herein.

On October, 17, 2006, the Institute of Medicine (IOM) of the National Academies, Washington, D.C., released a report "Seafood Choices. Balancing Benefits and Risks," in which the IOM reviewed the evidence on the benefits and risks associated with seafood consumption to help consumers make informed choices and to make recommendations on ways to guide U.S. consumers in making appropriate selections.

In this report, the IOM identified many benefits related to seafood consumption and EPA and/or DHA intake during developmental stages (i.e., pregnancy and/or lactation, infancy and/or childhood) based on clinical trials and epidemiological studies. Some of the potential benefits included: increased duration of gestation, improved infant and child developmental outcomes; cognitive benefits for the children when they were 4 or 5 years of age, benefits for infant and child neurological development; and increased infant visual acuity.

Additionally, the IOM developed seafood consumption guidance for population groups based upon both the benefits and risks of contaminant exposure (e.g., exposure to methylmercury and other contaminants and pollutants in seafood). This guidance indicates that for females who are or may become pregnant or who are breastfeeding and children up to the age of 12 may benefit from consuming seafood, especially those with relatively higher concentrations of EPA and DHA with some limitations as to quantity consumed (i.e., up to 12 ounces/week and up to 6 ounces albacore tuna/week) and avoid large predatory fish (e.g., shark, swordfish, tilefish, or king mackerel). As compared to many other varieties of seafood, salmon contains the least amount of methylmercury.

Among fish with high EPA/DHA content, salmon is included with those fish that have the highest concentration per serving. Canned salmon contains 0.718g (718mg) EPA (20:5 n-3) and 0.685g (685mg) DHA (22:6 n-3) per 3 ounce (85g) serving. Also, canned salmon contains a variety of other healthful nutrients, such as high-quality protein, calcium, selenium, niacin, vitamins B-6, B-12, and D. Several of these nutrients have been identified in the proposed rule as inadequate in the pregnant, lactating, and non-breastfeeding postpartum women (i.e., protein, calcium, niacin, and vitamin B-6). Saturated fat has been identified as a nutrient with excessive consumption among both children and women. Salmon contains lower amounts of saturated fat than many foods. Additionally, salmon contains only 118 calories per 3 ounce serving, which makes salmon a nutrient dense food. The nutrient content data referred to herein is based on the nutrition profile in Attachment B adapted from: *U.S. Department of Agriculture, Agricultural Research Service, 2006 USDA Nutrient Database for Standard Reference, Release 19.*

Finally, the addition of canned salmon would enhance the variety of foods offered to the WIC target groups and could positively influence life-long dietary choices for both the women and children in the program. Deep Creek Custom Packing can facilitate consumer consumption of canned salmon by providing to WIC a variety of economical, tasty salmon recipes that are easy to prepare by a culturally diverse population. Deep Creek Custom Packing also will provide consumer education materials regarding the benefits of salmon and seafood in a healthful diet.

Respectfully,

Jeff F. Berger

President

Deep Creek Custom Packing, Inc

TABLE 2.—MAXIMUM MONTHLY ALLOWANCES OF SUPPLEMENTAL FOODS FOR CHILDREN AND WOMEN IN FOOD PACKAGES IV, V, VI AND VII

Foods <sup>1</sup>	Children	Women		
	Food package IV, 1 through 4 years	Food package V. Pregnant and partially breastfeeding (up to 1 year postpartum) <sup>2</sup>	Food package VI Postpartum (up to 6 months postpartum) <sup>3</sup>	Food package VII. Fully breastfeeding (enhanced), (up to 1 year postpartum) <sup>4,5</sup>
Juice, single strength <sup>6</sup>	128 fl oz	144 fl oz	96 fl oz	144 fl oz
Milk, fluid	16 qt <sup>7,8,9,10</sup>	22 qt <sup>7,8,11,12</sup>	16 qt <sup>7,8,11,12</sup>	24 qt <sup>7,8,11,12</sup>
Breakfast cereal	36 oz	36 oz	36 oz	36 oz
Cheese	N/A	N/A	N/A	1 lb
Eggs	1 dozen	1 dozen	1 dozen	2 dozen
Fruits and vegetables <sup>13,14</sup>	\$8.00 in cash value vouchers	\$8.00 in cash value vouchers	\$8.00 in cash value vouchers	\$8.00 in cash value vouchers
Whole wheat bread or other whole grains <sup>15</sup>	2 lb	1 lb	N/A	1 lb
Fish (canned)	N/A	N/A	N/A	30 oz
Legumes, dry <sup>16</sup>	1 lb	1 lb	1 lb	1 lb
And/or Peanut butter	Or 18 oz	And 18 oz	Or 18 oz	And 18 oz

TABLE 3.—MAXIMUM MONTHLY ALLOWANCES OF SUPPLEMENTAL FOODS FOR CHILDREN AND WOMEN IN FOOD PACKAGE III

Foods <sup>1</sup>	Children	Women		
	1 through 4 years	Pregnant and partially breastfeeding (up to 1 year postpartum) <sup>2</sup>	Postpartum (up to 6 months postpartum) <sup>3</sup>	Fully breastfeeding (enhanced), (up to 1 year postpartum) <sup>4,5</sup>
Juice, single strength <sup>6</sup>	128 fl oz	144 fl oz	96 fl oz	144 fl oz
WIC Formula <sup>7*</sup>	455 fl oz liquid concentrate	455 fl oz liquid concentrate	455 fl oz liquid concentrate	455 fl oz liquid concentrate
Milk	16 qt <sup>9,10,11,12</sup>	22 qt <sup>9,10,13,14</sup>	16 qt <sup>9,10,13,14</sup>	24 qt <sup>9,10,13,14</sup>
Breakfast cereal <sup>15</sup>	36 oz	36 oz	36 oz	36 oz
Cheese	N/A	N/A	N/A	1 lb
Eggs	1 dozen	1 dozen	1 dozen	2 dozen
Fruits and vegetables <sup>16,17</sup>	\$8.00 in cash value vouchers	\$8.00 in cash value vouchers	\$8.00 in cash value vouchers	\$8.00 in cash value vouchers
Whole wheat bread <sup>18</sup>	2 lb	1 lb	N/A	1 lb
Fish (canned)	N/A	N/A	N/A	30 oz
Legumes, dry <sup>19</sup>	1 lb	1 lb	1 lb	1 lb
And/or Peanut butter	Or 18 oz	And 18 oz	Or 18 oz	And 18 oz

## Attachment: B

**Fish, salmon, canned, solids with bone and liquid**

Refuse 0% USDA National Nutrient Database for Standard Reference, Release 19 (2006)

NDB No. 15084 (Nutrient values and weights are for edible portion)

Nutrient	Units	1.00 X 3 oz
		85g
<b>Proximates</b>		
Water	g	58.49
Energy	kcal	118
Energy	kJ	495
Protein	g	16.81
Total lipid (fat)	g	5.14
Ash	g	2.21
Carbohydrate, by difference	g	0.00
Fiber, total dietary	g	0.0
Sugars, total	g	0.00
<b>Minerals</b>		
Calcium, Ca	mg	181
Iron, Fe	mg	0.71
Magnesium, Mg	mg	29
Phosphorus, P	mg	280
Potassium, K	mg	277
Sodium, Na	mg	471
Zinc, Zn	mg	0.78
Copper, Cu	mg	0.087
Manganese, Mn	mg	0.017
Selenium, Se	mcg	28.2
<b>Vitamins</b>		
Vitamin C, total ascorbic acid	mg	0.0
Thiamin	mg	0.020
Riboflavin	mg	0.158
Niacin	mg	5.556
Pantothenic acid	mg	0.468
Vitamin B-6	mg	0.255
Folate, total	mcg	13
Folic acid	mcg	0
Folate, food	mcg	13
Folate, DFE	mcg DFE	13
Vitamin B-12	mcg	3.74
Vitamin B-12, added	mcg	0.00
Vitamin A, IU	IU	48
Vitamin A, RAE	mcg RAE	14
Retinol	mcg	14
Vitamin E (alpha-tocopherol)	mg	0.54
Vitamin E, added	mg	0.00
Tocopherol, beta	mg	0.00
Tocopherol, gamma	mg	0.00
Tocopherol, delta	mg	0.00
Vitamin D	IU	530
Vitamin K (phylloquinone)	mcg	0.3

<b>Lipids</b>		
Fatty acids, total saturated	g	1 305
4 0	g	0 000
6 0	g	0 000
8 0	g	0 000
10 0	g	0 000
12 0	g	0 000
14 0	g	0 041
16 0	g	1 148
18 0	g	0 115
Fatty acids, total monounsaturated	g	1 536
16 1 undifferentiated	g	0 396
18 1 undifferentiated	g	0 908
20 1	g	0 231
22 1 undifferentiated	g	0 015
Fatty acids, total polyunsaturated	g	1 742
18 2 undifferentiated	g	0 049
18 3 undifferentiated	g	0 049
18 4	g	0 115
20 4 undifferentiated	g	0 065
20 5 n-3	g	0 718
22 5 n-3	g	0 041
22 6 n-3	g	0 685
Cholesterol	mg	47
<b>Amino acids</b>		
Tryptophan	g	0 189
Threonine	g	0 737
Isoleucine	g	0 775
Leucine	g	1 367
Lysine	g	1 544
Methionine	g	0 498
Cystine	g	0 180
Phenylalanine	g	0 656
Tyrosine	g	0 568
Valine	g	0 866
Arginine	g	1 006
Histidine	g	0 495
Alanine	g	1 017
Aspartic acid	g	1 722
Glutamic acid	g	2 510
Glycine	g	0 807
Proline	g	0 594
Serine	g	0 686