



February 9, 2016

IOM WIC Food Package Review Committee
Institute of Medicine of the National Academies
Food and Nutrition Board
Keck Center
500 Fifth St., NW
Washington, DC 20001

Dear Members of the IOM WIC Food Package Review Committee:

The National WIC Association (NWA) commends the IOM Expert Committee on the report released in November 2015: **Review of the WIC Food Package: Framework for Revisions: Interim Report**. As outlined in the document, it is essential that the final Committee WIC Food Package recommendations be implementable and meet both the nutritional and practical needs of WIC participants.

In its [previous comments](#), the National WIC Association requested that the IOM Expert Committee:

- 1) allow States the option to replace all jarred infant fruits and vegetables with CVV (hereafter referred to as CVB to reflect the transition to electronic benefits transfer or eWIC),
- 2) allow two separate food packages to meet the different developmental needs of the infant over age 6 months, and
- 3) consider States' various Management Information Systems (MIS) to enable efficient implementation of food package rules.

NWA respectfully submits the following additional recommendation to address specific food package implementation and suitability concerns:

For infants age 9 to 11 months: In states that are offering forms of fruits and vegetables other than fresh, allow states the option to offer those same forms of fruits and vegetables on the Cash Value Benefit (CVB) for infants.

As states transition to eWIC, some are finding that they are limited by the capacity of their MIS system to offer an infant CVB of only fresh fruits and vegetables while other participants are offered frozen, canned and dried varieties in addition to fresh. Once benefits are loaded to the eWIC card, they are aggregated by family. If a state offers the infant CVB, they must spend a great deal of time educating the participant on how the redemption of the infant's versus child's or woman's CVB are different as state and local agencies have no method to assure that the infant CVB is redeemed only for the allowed fresh form. In short, this has become a program integrity issue; and as a result, some states are choosing NOT to offer an infant CVB to participants, denying participants the choice to prepare their own infant food.

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In addition to the implementation challenges it poses, this regulatory restriction does not take into account the convenience, variety, and cost-savings that frozen and canned fruits and vegetables offer:

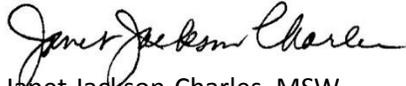
- 1) Many frozen and canned fruits and vegetables are equally as nutritious as the fresh varieties. A Review of the nutritional comparison of fresh, frozen and canned fruits and vegetables in the Journal of the Science of Food and Agriculture concludes that “Losses of nutrients during fresh storage may be more substantial than consumers realize. Depending on the commodity, freezing and canning processes may preserve nutrient value.”¹ “Frozen products lose fewer nutrients initially because of the short heating time in blanching, but they lose more nutrients during storage owing to oxidation. In addition to quality degradation, fresh fruits and vegetables usually lose nutrients more rapidly than canned or frozen products.”¹ In addition, the 2015 Dietary Guidelines for Americans inform that “all forms of foods, including fresh, canned, dried, and frozen, can be included in healthy eating patterns”² and support consuming vegetables and fruits in nutrient-dense forms – without added solid fats, sugars, starches, and sodium.² The Centers for Disease Control and Prevention also advises that “Fruits and vegetables can be fresh, frozen, canned, or dried as long as a certain level of healthfulness is maintained. For example, these foods should be unsweetened, low in sodium, and packed in juice, and fruit juices should be 100% juice.”³
- 2) Frozen and canned fruits and vegetables have longer storage life and are available year round, leading to easier access, increased utilization, and less waste.
- 3) Frozen and canned fruits and vegetables are convenient to use. They are pre-cut, pre-washed, and require minimal cooking, making them convenient to mash or puree for infants.⁴ Their fresh counterparts, on the other hand, could be a choking hazard for infants unless additional preparation and cooking are provided.
- 4) Frozen and canned fruits and vegetables are cost-effective. A study conducted by researchers at the Center for Economic Analysis in East Lansing, MI, found that fruits and vegetables packaged as frozen or canned are cost-effective and nutritious options for meeting daily vegetable and fruit recommendations in the context of a healthy diet.⁵

Given the benefits offered by frozen and canned fruits and vegetables, NWA recommends that States be provided the option to offer fresh, frozen and canned forms of fruits and vegetables on the CVB for all participant categories.

NWA is pleased to offer the Committee this recommendation to help further improve the food packages. The Association enthusiastically supports the IOM’s review of the food packages and is delighted to partner in this effort.

For questions regarding the recommendation, please contact NWA Staff/Nutrition Program Director, Cecilia Richardson at crichardson@nwica.org/202.232.5492.

Sincerely,



Janet Jackson-Charles, MSW
Chair, Board of Directors



Rev. Douglas A. Greenaway
President & CEO

¹ Rickman, Joy C, Barrett, Diane M, Bruhn, Christine M. Review, Nutritional comparison of fresh, frozen and canned fruits and vegetables, Part 1, Vitamins C and B and phenolic compounds. *Journal of the Science of Food and Agriculture*. 87:930-944 (2007).

² U.S. Department of Agriculture and U.S. Department of Health and Human Services. *Dietary Guidelines for Americans, 2010*. 7th Edition, Washington, DC: U.S. Government Printing Office, December 2010, available at www.dietaryguidelines.gov.

³ *Vegetables*. Atlanta: U.S. Department of Health and Human Services; 2011, available at <http://www.cdc.gov/nutrition/strategies-guidelines/index.html>.

⁴ Produce for Better Health Foundation. It all Matters! 2012. http://pbhfoundation.org/pdfs/pri_sec/retail/mar_tools/all_forms_health_influence/All_Forms_Health_Influencer_Brochure.pdf.

⁵ Miller, Steve and Knudson, William. Nutrition and Cost Comparisons of Select Canned, Frozen and Fresh Fruits and Vegetables. <http://ajl.sagepub.com/content/8/6/430>.