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To: Suzanne Murphy, PhD, RD
Chair, Review of the WIC Food Packages Committee
Institute of Medicine, Food and Nutrition Board

From: Elizabeth Pivonka, PhD, RD
President, Produce for Better Health Foundation

Subject: Comments to the Institute of Medicine, Food and Nutrition Board WIC Food Package Review Committee

The Produce for Better Health Foundation (PBH) is the founding partner, along with the National Cancer Institute, for the National 5 A Day for Better Health Program that encourages all Americans to eat at least 5 to 9 daily servings of fruits and vegetables.

PBH applauds the USDA and the IOM Committee for undertaking this important study to update the WIC food packages and is hopeful that through your efforts the revised packages will better reflect our current understanding of food and nutrient needs of the important populations served by WIC.

My comments focus on **FOUR** key areas.

Area 1: Key Nutrients

First, PBH supports the findings outlined in the recent report: *Proposed Criteria for Selecting the WIC Food Packages*. This report identified key nutrients and food groups in need of more, or less, emphasis in the revised food packages.

Specifically, three key nutrients – potassium, fiber and Vitamin C, were found to be inadequate among a number of the participant categories.

The analysis of food groups showed that children 2 to 5 did poorly in meeting vegetable recommendations and women did poorly in meeting fruit recommendations.





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- The average American eats 1.3 servings of fruits and 2.9 servings of vegetables per day (this includes French fries). Vegetables drop to 2.3 servings excluding French fries and chips.*
- Excluding French fries, only 20% of Americans get their recommended number of servings of fruit and vegetable servings each day. *
- French fries make up 20% of vegetable servings for adults 20 and older and 32% for children 2 to 19 years old.**
- Several surveys, including CDC's Behavioral Risk Factor Surveillance System (Li et al, 2000), USDA's Economics Research Survey (Putnam et al, 2000), the Michigan Behavior Risk Factor Survey (Anderson et al, 2001), and research conducted by professional market research firms (NPD, 2002) and on free-living adults (DeBoer et al, 2003) have documented that few Americans are attaining even the minimum goal of 5 servings of fruits and vegetables per day.

The WIC report also highlighted nutrients that may be excessive including sodium, calories and total fat for certain participant categories.

For these reasons, increasing the servings of both fruits and vegetables in the WIC food packages will address several of the problem areas identified in the report – from enhancing intake of key nutrients to helping decrease intake of problem nutrients like sodium, fat and excess calories. Fruits and vegetables are among the best sources for fiber, potassium and Vitamin C – priority nutrients you identified in the report. They are also naturally low in sodium and fat, and while loaded with nutrients, are generally low in calories. When used as a substitute for energy dense, less nutritious foods, fruits and vegetables play an important role in maintenance of a healthy weight.

PBH strongly recommends that both fruits and vegetables be added to the food packages.

We also urge the committee to look closely at the Dietary Guidelines for Americans 2005 report issued in late August. The Dietary Guidelines Advisory Committee (DGAC) stands poised to increase the recommendation for fruits and vegetables to 5 to 13 servings a day, versus the current 5 to 9. The number of servings depends on ones estimated calorie needs. These new, science-based recommendations should be considered in the development of phase 2 of your work and may warrant even greater emphasis on fruits and vegetables in the final analysis.





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PBH specifically recommends adding a fruit and vegetable category to food packages II through VII, and allowing substitutions of fresh, canned, and frozen fruits and vegetables to be used, and 100% juice be allowed as just one of the offerings within the category.

Criteria should be set for added ingredients like fat, sugar and sodium for the fruit and vegetable category. PBH recommends that the WIC food packages only include fruits and vegetables that have been processed in a way that maintains their integrity as healthful foods. Fruits and vegetables that have been fried or served with fatty sauces should not be included. Limits should be set on the amount of added sugar, salt, saturated and trans fat that can be included in canned, dried, frozen, and prepared fruits and vegetables allowed as part of the WIC food packages.

Area 2: Cost of Fruits and Vegetables

The second point is in regards to the cost of fruits and vegetables. An Economic Research Service report: *How Much Do Americans Pay for Fruits and Vegetables*, issued in July, dispelled the myth that healthy eating is too expensive. The report showed that Americans can meet their fruit and vegetable requirements for less than a dollar per day. According to ERS, 64 cents buys 3 servings of fruit and 4 servings of vegetables. This represents only 16% of an individual's daily food costs – and this is the analysis for low income households.

1999 A.C. Nielsen Homescan data was used to look at fresh, frozen, dried, and canned fruits and vegetables without other added ingredients. The research showed that more than half of fruits and vegetables cost an average of 25 cents or less per serving.

The report also showed that Americans spend about the same amount on fruits and vegetables as they do on soft drinks, bacon, sausage, salty snacks, sugar and candy – food items that do not contribute positively to a healthy dietary pattern.

While we realize that there are many other barriers to accessing fruits and vegetables, including availability of grocery stores in inner cities and product shelf life and quality, we now know that cost is not as much of a factor as once thought, and that put in





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perspective, getting the daily recommended servings of, for example, 7, fruits and vegetables costs less than one three-ounce candy bar.

We hope this ERS report will be of use to committee members as you address the cost neutrality issues in phase 2. The WIC Food Package should better accommodate cultural and participant preferences and regional variations of supply. Given the wide variation in cost and availability of fruits and vegetables across the country, a more flexible system will allow participants to have access to a greater variety of nutritious and economical products. For example, states should have the flexibility to substitute a more economical fruit or vegetable offering if there is an abundance of that product at certain times of the year. Such a substitution would have to be made within the prescribed nutrition profile of the package.

Area 3: Role Modeling

The third point relates to the importance of consistent exposure to fruits and vegetables including role modeling to promote lifelong healthy habits.

We know that from an early age, infants and toddlers are not consuming the recommended servings of fruits and vegetables, and the ones they are consuming are not nutrient-rich. For example, the Gerber FITS study found that:

- On any given day, 25-30% of infants and toddlers ages 9 -24 months do not eat any fruit and 20-25% do not eat vegetables.
- In addition, French fries were one of the three most common vegetables consumed by infants 9 to 11 months of age and by 15 to 18 months, French fries were the most common vegetable.

These findings are frankly appalling. At a time when we have practically total control over what we are feeding our babies and toddlers, we are failing miserably at exposing them to a wide variety of healthy fruits and vegetables, and are setting the stage for lifelong poor eating habits and consequently, poor health.

The WIC food packages, especially packages II and IV for infants and children ages 4 months to 5 years, offer an ideal opportunity to expose children at an early age to a variety of fruits and vegetables; the only exposure they get now through the packages is fruit juice. The other packages, V, VI, and VII for women, also offer





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an excellent approach to not only exposing WIC mothers to more fruits and vegetables, but also allowing them to be positive role models for their children. Right now, their only exposure through WIC is fruit juice and for all, can carrots for those breastfeeding.

Research has shown that when children see parents and other caregivers eating healthy foods – like fruits and vegetables, the children are more likely to eat them too.

Area 4: Nutrition Education

My final point is about nutrition education and the WIC program. While we realize nutrition education was not part of your charge, we urge you to make recommendations in this area. The WIC program provides one of the best examples of the importance of integrating nutrition education with the direct provision of food through the food packages. Given the potential for significant changes to the WIC food packages as a result of your work, educational efforts to communicate these changes should be strengthened.

To this end, we urge committee members to look at the materials we have provided about the Produce for Better Health Foundation's "5 A Day The Color Way" campaign. The materials have been highly effective at defining the "5 A Day The Color Way" concept to a diverse audience of consumers and can serve as an effective and easy way for WIC providers to convey important fruit and vegetables messages, in a format that has proven highly effective in a variety of audiences.

Attached to this message are additional materials including fruit and vegetable nutrient charts and research highlights that I hope you find useful. Thanks you for your important work to update the WIC food packages.

* Produce for Better Health Foundation, State of the Plate: Study on America's Consumption of Fruits and Vegetables, 2003.

** USDA, CSFII, 1994-1996.





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Attachments:

Fruit and Vegetable Options for WIC Priority Nutrients

PBH Brochure with nutrient profiles

Color Way Materials

Research Highlights: FITS Study and Role Modeling

