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January 25, 2023

WIC Administration, Benefits, and Certification Branch
Policy Division
Food and Nutrition Service

Re: Docket No. FNS-2022-0007 (Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Revisions in the WIC Food Packages)

Dear Chief Allison Post:

On behalf of Oldways, a 501(c)3 educational nonprofit dedicated to inspiring people to embrace the healthy and sustainable joys of the old ways of eating, we are writing in support of the revisions to the WIC food packages.

Foods redeemable under WIC have the power to shape preferences and build healthy habits for the long-term for this important and vulnerable population. Studies show that it can take several repeated exposures to a food before children begin to accept it, and it may take even more exposures for adults. Exposure to whole grain foods, seafood, and other healthy ingredients accessed through WIC and other nutrition assistance programs can all help to adjust palettes and foster acceptance (and even preference) for these foods over time. [Research](#) also demonstrates that expanding healthy food options in the WIC food packages has made participating stores far more likely to stock these healthy foods, thereby improving access to nutrient-dense foods for the wider community.

We are pleased that the proposed revisions to the WIC food packages incorporate many of the suggestions outlined in the [2017 NASEM report](#) and better reflect federal dietary guidance. Specifically, we are writing in support of the following updates:

- We support the proposal that all breakfast cereals redeemed under WIC be required to meet the criteria for whole grain-rich. Given that whole grain intake continues to fall significantly below recommended levels and given that breakfast cereals are one of the most common sources of whole grains for Americans, it is our firm belief that every cereal product redeemed through WIC should contribute to increasing whole grain intake for participants. Decades of nutrition science demonstrate that higher whole grain intake is associated with a multitude of [health benefits](#). Those who consume higher amounts of whole grain experience reduced risk of heart disease, stroke, type 2 diabetes, and death from all causes. Increased whole grain intake is also associated with less cognitive decline, lower cholesterol, lower levels of inflammation, and the maintenance of healthier body weight.

- We support the proposal to expand whole grain options to include foods like quinoa, blue cornmeal, millet, triticale, amaranth, sorghum, wheat berries, buckwheat, and teff, as well as whole wheat versions of pita, English muffins, bagels, and naan bread. While this revised list is not exhaustive of every whole grain option, it is a step in the right direction and will be much appreciated in helping WIC participants access whole grains that accommodate their cultural and culinary preferences.
- We support the proposal to expand the availability of canned fish to children, pregnant, and postpartum partially breastfeeding women, to help these populations close the gap in seafood consumption and move closer to the recommended intake.
- We support the proposal to authorize canned legumes in addition to dried legumes, as this update addresses some of the time and cooking barriers facing many WIC participants today. The long cooking times required to prepare dried beans are one of the biggest barriers when it comes to legume consumption. Fortunately, canned beans are one of the most affordable sources of protein available, meaning that this update will not be cost prohibitive. We also support the proposal to allow tofu as a substitute for eggs, to better accommodate participants with allergies, lifestyle, or cultural food preferences.
- We support the proposal to increase allowances for fruits and vegetables, to expand the fruit and vegetable benefit to include both fresh and one other form (such as canned or frozen), and to allow herbs to be included in the vegetable benefit. These changes can help accommodate cultural eating patterns encourage fuller redemption and consumption of the benefit, as well as help reduce food waste.

Despite overwhelming support, we identified areas where the WIC food packages could be further aligned with federal dietary guidance or amended to help promote compliance and benefit redemption. Below are the relevant and important issues that we urge the FNS to address in future revisions of WIC and were absent from the proposed revisions as currently written.

- The proposed revisions state that “because the whole grain content of food products is not always easily identifiable on a product label, the Department would provide additional guidance on evaluation of grain products as needed.” As creators of the Oldways Whole Grains Council and the Whole Grain Stamp packaging symbol, we invite FNS to engage with us on how the Stamp can be used as a tool to help stakeholders quantify the whole grain content of products and identify products in which at least half of the grains are whole. Our contact information is included in our signature below to continue this discussion further.
- Currently, canned/pouched seafood is the only form of seafood available in WIC food packages. We recommend authorizing fresh and frozen seafood, in addition to canned. The 2017 NASEM report encourages state agencies to authorize as many



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food options as feasible to promote acceptability and redemption. Fruits and vegetables are available in fresh, frozen, and canned forms, and we believe that seafood should be too, given that the 2017 NASEM report identified seafood as a food group of high priority for pregnant, lactating, and postpartum mothers and young children.

We thank the FNS for the opportunity to share our expertise on the proposed revisions, and we look forward to learning more about how we can best support strengthening nutrition standards for pregnant and postpartum women and young children.

A handwritten signature in black ink that reads "Kelly LeBlanc".

Kelly LeBlanc, MLA, RD, LDN
Director of Nutrition, Oldways
Kelly@oldwayspt.org

A handwritten signature in blue ink that reads "Sara Baer-Sinnott".

Sara Baer-Sinnott
President, Oldways
Sara@oldwayspt.org