



**International Dairy Foods Association**

Milk Industry Foundation

National Cheese Institute

International Ice Cream Association

February 1, 2010

Ms. Debra R. Whitford  
Director, Supplemental Food Programs Division  
Food and Nutrition Service  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 528  
Alexandria, Virginia 22302

**RE: Interim Rule, Docket ID FNS-2006-0037-0003, Special Supplemental Nutrition Program for Women, Infants and Children (WIC): Revisions to the WIC Food Packages**

Dear Ms. Whitford:

We appreciate the opportunity to comment to the USDA Food and Nutrition Service in response to the interim rule on the “Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Revisions in the WIC Food Packages” published in the *Federal Register* of December 6, 2007.

The International Dairy Foods Association (IDFA), Washington, DC, represents the nation's dairy manufacturing and marketing industries and their suppliers, with a membership of 530 companies representing a \$110-billion a year industry. IDFA is composed of three constituent organizations: the Milk Industry Foundation (MIF), the National Cheese Institute (NCI) and the International Ice Cream Association (IICA). IDFA's 220 dairy processing members run more than 600 plant operations, and range from large multi-national organizations to single-plant companies. Together they represent more than 85% of the milk, cultured products, cheese and frozen desserts produced and marketed in the United States. IDFA can be found online at [www.idfa.org](http://www.idfa.org).

As stated in our previous comments on November 6, 2006 related to the proposed rule revising the WIC food package, IDFA and its members are pleased that dairy products such as milk and cheese continue to play a prominent role in the food packages under the WIC program.[1] We recognize and support the overall movement of the WIC program towards greater consistency with the 2005 Dietary Guidelines for Americans and MyPyramid of which dairy products constitute one of the major food groups to encourage. However, in addition to low fat and fat free milk, the Dietary Guidelines for

Americans also recognize that yogurt as well as cheese can serve as an appropriate equivalent milk product in obtaining the recommended 2-3 servings per day.

IDFA strongly urges USDA to reconsider our request to modify the WIC food packages to include yogurt as an authorized partial substitute for fluid milk. This request is also consistent with the National Academies' Institute of Medicine ("IOM") 2006 recommendation for changes to the WIC food packages. IDFA believes that this change will help ensure WIC participants meet their nutrient requirements by providing an affordable and familiar dairy product choice that is well tolerated by lactose intolerant individuals and enjoyed by many.

### **IOM's Recommended Changes to WIC Included Partial Substitution for Yogurt**

IDFA was greatly disappointed to see that the interim rule did not follow the IOM's recommendation to include limited amounts of yogurt, a highly nutritious dairy food, as an allowable substitute for milk in the food package for women and children. In light of the recent decision for the WIC program to give \$10 vouchers for fruits and vegetables for women, it appears that yogurt substitution remains as the only IOM recommendation that has not been implemented by USDA. We recognize that FNS may have chosen not to follow this IOM recommendation for cost reasons rather than nutrition considerations. However, we respectfully point out that Congress gave the Secretary authority to amend the food packages to "reflect nutrition science, public health concerns, and cultural eating patterns." No authority exists to base the package on the level of appropriations. Furthermore, Congress also authorizes the Secretary to approve State agencies' requests to allow substitution of different foods providing the nutritional equivalent of foods in the food package, to allow for different cultural eating patterns. In summary, we believe that this tentative decision does not consider the nutrition science, public health concerns, and cultural eating patterns as recommended to the Secretary by the IOM and should be reconsidered.

### **Nutrient Adequacy May be Improved with Yogurt Substitution**

Yogurt is consumed by many ethnic groups who generally do not historically consume fluid milk. WIC participants are more likely to meet their nutritional needs if they are able to choose nutritious foods that they are familiar with and enjoy. The IOM recognized that a variety of foods should be made available to WIC participants, especially those of diverse cultures and ethnicity. As noted milk and cheese are not always included as traditional foods for some cultural groups, while yogurt, soy beverage or tofu may be more acceptable choices for those who avoid milk for religious or cultural reasons. However, beverage intake data shows that, compared with milk, soy beverage consumption is low among the main ethnic group represented by WIC participants.[5] At least one ethnic group, Asian women, has a strong preference for yogurt in lieu of fluid milk.

We believe the inclusion of yogurt at some reasonable level is essential in order to meet the nutritional needs of this segment of the WIC population, as well as helping to meet

the nutritional needs of those who have other reasons to not consume milk or who prefer yogurt. Such reconsideration is clearly justified by the nutritional benefits of yogurt. Like other dairy foods, yogurt is a nutrient-rich food. One serving of yogurt provides protein, calcium, phosphorous, potassium, riboflavin, vitamin B12, and many yogurts are fortified with vitamin A and vitamin D, thus providing three key priority nutrients to WIC participants: calcium, potassium and vitamin A.

### **Yogurt is Well Tolerated by Lactose Intolerant Individuals**

Yogurt could also help meet the nutritional needs of WIC participants who are lactose intolerant. Lactose intolerance is often cited as a reason for low milk consumption among certain ethnic groups. A recent study found that the overall rate of self-reported lactose intolerance at 12 percent in the United States, including eight percent of European Americans, 10 percent of Hispanic Americans, and 20 percent of African Americans [6]. Nonetheless, among those who do have trouble digesting lactose, yogurt is a well-tolerated alternative to milk that also meets the *Dietary Guidelines for Americans* objectives. The *Dietary Guidelines for Americans* recommends choosing milk alternatives within the dairy group first to obtain the full nutrient package dairy foods offer [7].

A recent paper from the National Medical Association (“NMA”), a leader in African-American health issues, noted that “all researchers acknowledge that African Americans, Native Americans, and Asians are disproportionately affected [by lactose intolerance].”[8] The article cautioned that “African Americans may be at risk of nutrient deficits as a result of the under-consumption of dairy products because of lactose intolerance,” and that these dairy consumption patterns may create vulnerability to other illnesses and diseases such as hypertension, obesity, cancer, and diabetes. The article also acknowledged that yogurt can play a role in “ensuring a sufficiency of calcium, riboflavin, protein, potassium, and/or other nutrients,” and recommended the use of milk substitutes such as “yogurt” to reduce the risk of nutritional deficits and to manage lactose intolerance.

In the manufacture of yogurt, the cultures that ferment the milk and produce yogurt also consume the lactose that is naturally present in the milk. Through the very processing of yogurt, the lactose content in the finished product is reduced. Many individuals that are lactose intolerant can consume yogurt without discomfort. Since yogurt is a naturally low lactose dairy food that provides many of the same nutrients as milk, this is often a preferable choice for consumers who want to avoid lactose.

Similar to cheese, yogurt is a preferred dairy food for many cultural groups who choose not to consume fluid milk frequently. Since yogurt is a good source of so many nutrients--again providing three key priority nutrients--it would be an appropriate way for many program participants to consume their recommended levels of dairy products.

## **Yogurt is an Affordable Option**

While the WIC statute requires the Secretary to consider nutrition, public health, and cultural eating habits, information is also available on the cost implications of allowing yogurt as a substitute dairy product.

The IOM recommended including both yogurt and tofu as milk substitutes, saying that limited substitutions of both would maintain nutritional content while keeping WIC food packages cost neutral. [2] In the interim rule, USDA cited cost as a reason for not approving yogurt as a milk substitute in the WIC food packages. [3] As part of this study, prices for milk, yogurt and other milk substitutes were collected from participating vendors and compared. Whether prices were compared by volume or by calcium content, yogurt was *less expensive* than tofu, which USDA approved as a milk substitute in WIC. [3]

In the volume comparison, the average price of 32 ounces of yogurt was \$3.01, compared with \$4.70 for a pound of tofu. In the calcium comparison, yogurt was \$0.17 per 100 mg/calcium, compared with \$0.43 per 100 mg/calcium for tofu. [4] This suggests that, on a unit basis, yogurt is a more affordable way to offer calcium to WIC participants than tofu. The calcium content price comparisons from the study appear in the Appendix in Figure 1.

In addition to assessing the direct cost of a food, other factors such as convenience should be considered. Yogurt also can be an extremely convenient dairy source because it is easy to have available for a relatively long time. Although it is perishable and requires refrigeration, the typical code date for yogurt is 35 to 40 days from manufacture. This would allow WIC participants to buy a container of yogurt and use it over the rest of the month, making it easy to consume the beneficial nutrient package of yogurt at any time.

## **New Research - Pilot Study on Yogurt Substitution**

In the interim rule, USDA expressed interest in obtaining information about which WIC participants would most benefit from having yogurt included in their food packages.

One of IDFA's members General Mills had the opportunity to partner with the California WIC program, National Dairy Council, Dairy Council of California, and the Children's Hospital & Research Center, Oakland, to conduct a one month pilot study looking at the impact of adding yogurt to the food packages for women [8]. The study is the first to document the outcome of providing yogurt as a milk substitute to low-income women in WIC. A manuscript based on the study will be submitted to a peer-reviewed journal. The authors expect that the manuscript will be published in a supplement to the May 2010 *Journal of Nutrition Education and Behavior* dedicated to WIC. During the pilot study WIC clients that elected to participate were given two vouchers for a 32 ounce container of yogurt. The yogurts offered in the study included five choices of low fat yogurt, one plain and four flavored Yoplait™ yogurts that met the nutritional requirements established in the IOM recommendations. Those receiving yogurt coupons also received

a brochure on the uses of yogurt in snacks and meals and assistance on how to find retailers where they could redeem their coupons.

The study provides a wealth of information on attitudes, beliefs and behaviors related to yogurt and dairy consumption by WIC participants. In general, yogurt was very popular among all participants and quite acceptable among Hispanic participants. Among the key study findings [9]:

- Eighty-six percent of participants approached at the start of the study were eager to substitute some of their milk vouchers for yogurt vouchers. While 31 percent of participants strongly agreed that they liked the taste of yogurt, only 18 percent said the same about milk.
- Most women—90 percent—used at least one of their two coupons to buy yogurt, despite limited flavor and container size options.
- While yogurt was more expensive than milk, it may be less expensive than other WIC milk substitutes, particularly when evaluated based on calcium contribution.
- Adding yogurt to the WIC food packages may result in a net increase in nutrient consumption. Compared with those who received no coupons, those who used the yogurt coupons reported increasing their yogurt intake an average of 1.0 ounce per day, while not significantly decreasing consumption of other dairy products.
- Low yogurt consumers—those who consumed less than 1.0 ounce per day—were most likely to benefit from receiving yogurt coupons. They increased their yogurt consumption by 2.8 ounces per day compared with those not receiving coupons.

In summary the pilot study demonstrates that yogurt is a popular choice among WIC participants that would help increase dairy consumption and help to improve nutrient intakes. We understand that more details of this important pilot study will be provided in comments submitted on behalf of the National Dairy Council and General Mills.

### **Yogurt Products Have a Very High Level of Consumer Acceptance**

The WIC packages are only effective if WIC participants are willing to eat the designated types of food. Especially when the government is trying to educate consumers to eat differently--i.e., more whole grains and more fruits and vegetables, which, in reality, consumers are likely to eat in varying amounts--it is essential that the WIC packages have an "anchor" of nutritious foods that consumers can be depended on to eat. Dairy foods like milk, cheese and yogurt provide just such an anchor. They are longtime staples of the American diet and should be depended upon to ensure that WIC consumers receive the intended level of nutritional value.

Over the wide range of dairy products, nearly all individuals can find at least one product they enjoy consuming. For many people, this is fluid milk as a beverage or with other products such as breakfast cereal. For others, it is cheese, as a snack or an integral part of a lunch or dinner. For many, it is yogurt, as part of a healthy breakfast or lunch, or as a snack. These foods are all nutrient-dense and provide key priority nutrients that

Americans need. This is particularly true for certain ethnic and cultural groups, as noted above with Asian women having a strong preference for yogurt in lieu of fluid milk.

But to be an effective "anchor" for the WIC program, WIC participants need to have the option of the full range of dairy products--that include yogurt along with cheese as a substitute for milk. This is particularly necessary, as noted, to meet the different cultural preferences as well as to meet the needs of those who are lactose intolerant.

## **Conclusion**

IDFA respectfully requests that USDA include yogurt as an authorized partial substitute to fluid milk in WIC food packages. Yogurt provides significant amounts of potassium and calcium - two of the priority nutrients identified by the IOM for pregnant and breastfeeding women. In addition, yogurt is a widely-available dairy option for those who are lactose intolerant, or who avoid milk for cultural or other reasons. Yogurt is a nutrient dense, highly popular, widely available, culturally-sensitive food product that will enjoy wide acceptance by WIC participants. As demonstrated by the recent yogurt pilot study conducted in California, it is a very popular choice for WIC participants that will help increase critical nutrient intakes. It is for these compelling reasons that we urge USDA to include yogurt in the WIC Food Packages.

Sincerely,

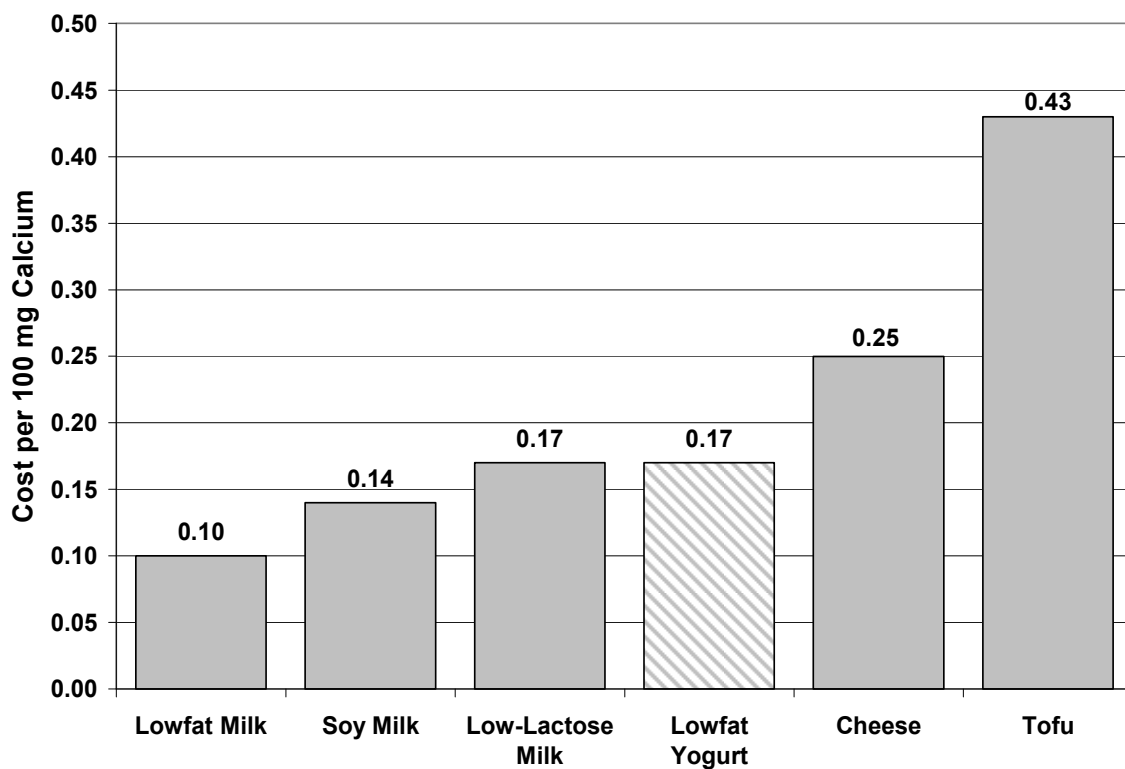


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**Figure1: 2009 National Average Cost of Lowfat & Low-lactose Milk, Soy Milk, Yogurt, Cheese and Tofu, per 100 mg/calcium**



Note: This graph duplicates Figure E3, 2009 National Average Cost of Low-fat and Low-lactose Milk, Soy Milk, Yogurt, Cheese and Tofu, per 100 mg/calcium, page 38, *Evaluation of a Pilot Project: Adding Yogurt to the WIC Food Package for Women*, by Ellen B. Fung and Lorrene D. Ritchee, The Dr. Robert C. and Veronica Atkins Center for Weight and Health, University of California at Berkeley

## References

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