



September 16, 2005

Honorable Eric M. Bost  
Under Secretary for Food, Nutrition and Consumer Services  
U.S. Department of Agriculture  
240-E Whitten Building  
12<sup>th</sup> & Jefferson Drive, S.W.  
Washington, D.C. 20250

Dear Mr. Secretary:

We are writing on behalf of the nation's dairy producers and processors. The National Milk Producers Federation (NMPF) and the International Dairy Foods Association (IDFA) are the leading advocacy organizations for America's dairy industry, which supplies critical nutrients to all age groups through milk, cheese, yogurt and other fine products.

Our organizations have long supported the Special Supplemental Program for Women, Infants, and Children (WIC program). WIC's unique combination of food assistance and nutrition education has made a difference in the lives of millions of Americans. We are proud that dairy products are a major component of the WIC food package.

We are concerned that WIC recipients may be denied many of the nutritional benefits of dairy products under changes to the WIC package recommended by the Institute of Medicine (IOM). These changes, described in the report *WIC Food Packages: Time for a Change* (2005), would materially reduce the consumption of milk and cheese in the WIC program. We appreciated the opportunity to convey our concerns to Deputy Undersecretary Katherine Coler and Deputy Administrator Steve Christensen last summer, but we now wanted to directly apprise you of the situation.

We urge you to consider the potential harm to WIC recipients from dietary changes that would be likely as a result of these recommendations before issuing a proposed rule making changes in the food package. To consciously cut back dairy consumption in the WIC program, immediately after the 2005 Dietary Guidelines for Americans listed dairy among the "foods to encourage" and noted the deficiency of most citizens in nutrients supplied by dairy products, would be a mistake.

We are fully aware that one major reason for reducing the role of dairy products – as well as certain other foods in the WIC package – was the IOM committee's desire to make budget-neutral proposals to the Department of Agriculture. However, we think the committee's recommendations should have been nutritionally-based, recommending the optimal quantities of all foods. While we share the goal of increasing fruit and vegetable consumption among WIC participants, we believe that the correct way to accomplish this is to encourage Congress to expand the WIC budget in order to add fruits and vegetables, without cutting other nutritious foods such as dairy.

However, if new funds are not available, budget neutrality only increases the importance of utilizing the most cost-efficient products to deliver the necessary nutritional attributes to WIC recipients. Dollar for dollar, no other product delivers the same broad spectrum of critical nutrients at consistent levels than dairy.

We would like to make the following observations about the IOM recommendations.

1. **We question the dramatic reduction in the number of dairy servings embodied in the recommendations.** According to published data on WIC program participants from USDA and IOM reports --
  - a. For children 1-4 years, calcium intake is adequate but the intake of **potassium** – of which dairy is an important source – was consistently below the Adequate Intake level. That was also true for all groups of women in the WIC program.
  - b. For eligible women, **calcium** intake is significantly inadequate, across age groups and among both pregnant and lactating women.
  - c. Deficiencies of **magnesium** – yet another nutrient supplied by dairy – are almost universal among 14-18-year-olds, with 96.7% having intakes less than the Estimated Average Requirement. The same is true of 57.4% of pregnant and lactating women.
  - d. There is no evidence that WIC recipients are over-consuming dairy products, with fewer than 1% of infants, children and women having intakes above the **Upper Limit for calcium**.
  - e. **Mean servings of dairy consumed by WIC recipients are below two per day** for all groups, in sharp contrast to the three servings per day recommended for most Americans by the 2005 Dietary Guidelines for Americans. Among women 20-39, only 14% consume adequate dairy, even under the pre-2005 recommendations.
  - f. The IOM identified potassium as a priority nutrient for children, and cited vegetables as a source. However, **dairy provides most of the potassium in the American diet**, and three servings of milk provide 33% of the daily potassium requirement.
2. By reducing dairy in the WIC package, USDA would not only **reduce choices available to women who already have inadequate intakes** of calcium and potassium, but also will **reduce the dairy intake of other WIC household members**, like children over the age of 5, who frequently consume part of the WIC package.
3. Under the IOM recommendations, it appears **there would be a substantial decline in dairy consumption in the WIC program**, even after adjusting for the fact that present food prescriptions are frequently below the maximum allowable quantities of dairy. The economic impact on the U.S. dairy industry could be more than **\$300 million per year**.

For these reasons, we believe USDA should make major changes in the IOM recommendations, and should not merely issue them automatically as a proposed rule. The presumption of agency support created by incorporation in a proposed rule would be unfortunate, and would be inadvisable in the face of the compelling need to encourage adequate dairy consumption among WIC recipients. **Thus, our chief recommendation is not to reduce the number of dairy servings in the WIC food package.**

We also have several other recommendations on the WIC food packages, which are relevant whether or not USDA accepts our primary request not to reduce dairy servings:

- **Postpartum, non-breastfeeding women should receive at least 3 cups of milk per day instead of 2.** If the 2005 Dietary Guidelines are to be the standard for the number of daily servings provided, USDA should not knowingly short-change any program recipients. We understand the

desire to provide incentives for breastfeeding, but these should be positive rather than punitive – e.g., an additional serving for breastfeeding women, rather than a cutback for those who do not breastfeed.

- **Cheese substitutability should not be cut back.** The flexibility in the current system provides important options and choices to WIC clients. Cheese is a good means of providing dairy's unique nutrient package to people who may not consume fluid milk for cultural or dietary reasons. At minimum, substitutability should be enough to accommodate current consumption patterns with a safety factor, i.e., at least 2 or 3 pounds rather than only 1.
- **Soy beverages should not be substitutable for milk.** The calcium in these beverages is less bioavailable and they are two to three times as expensive as milk. Ingredients – including calcium – tend to settle out in the bottom of the container, which means that people may consume even less calcium. Because there is no standard of identity for soy beverages, we cannot know whether WIC clients will receive appropriate amounts of magnesium, potassium and other nutrients. And many Vitamin D fortified soy beverages are fortified with Vitamin D2 instead of D3, which is less than one-third as potent as Vitamin D2.
- **Yogurt should be fully substitutable for milk.** Yogurt represents an important way to increase calcium and potassium consumption among people who may not readily consume fluid milk. Yogurt is better accepted in some cultures than fluid milk and is often more easily tolerated by persons with lactose maldigestion.

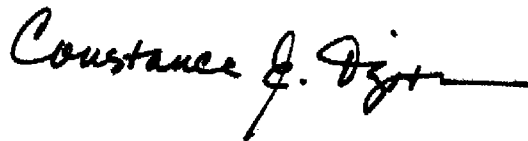
In addition, the significant changes in the IOM report require robust pilot testing to ensure that in the real world, the new mix of products actually delivers the required nutrient package to WIC recipients. Yet, as you are well aware, there has been no pilot testing. How can the Department risk the nutritional efficacy of the WIC program by moving away from a proven performer like dairy, without pilot testing the new food packages?

NMPF and IDFA appreciate the opportunity to share these concerns and ideas. We repeat that our industry has found the IOM recommendations deeply troubling, and ask you to exercise your leadership to ensure that USDA's proposed rule provides a more balanced food package that does not reduce the critical role of dairy products.

Sincerely,



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National Milk Producers Federation



Constance E. Tipton  
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International Dairy Foods Association

