

February 15, 2023

WIC Administration, Benefits, and Certification Branch
Policy Division
Food and Nutrition Service
P.O. Box 2885
Fairfax, Virginia 22031-0885

RE: Docket FNS-2022-0007

Dear Sir or Madam:

Dairy Council of California appreciates the opportunity to submit comments for consideration by the USDA Food and Nutrition Service on the Special Supplemental Nutrition Program for Women, Infants, and Children: Revisions in the Women, Infants, and Children Food Packages.

As a science-based nutrition organization, Dairy Council of California collaborates with partners to elevate the health of children and families through the pursuit of lifelong healthy eating habits. Funded by California's dairy farm families and milk processors and under the guidance of California Department of Food and Agriculture, Dairy Council of California's registered dietitian nutritionists and experts in nutrition education, agriculture literacy and communication engage with a variety of stakeholders in school, healthcare, and community settings, working together to achieve nutrition security. Each year these collective efforts improve access to nutritious foods and nutrition education for millions of people in California, across the nation, and beyond, demonstrating the dairy community's contribution to sustainable nutrition and community health.

Dairy's Unique and Valuable Contribution to Maternal Health, Child Growth, and Development

Pregnancy and early childhood are critical growth and development periods needing adequate access to healthy foods with key nutrients for optimal outcomes; prioritized nutrition security is critical during these life stages. These life stages require the right balance of nutrients, including high-quality protein and micronutrients, to promote optimal growth, development and lifelong health. Research confirms that milk, yogurt, and cheese offer a unique package of nutrients, including seven of the 14 nutrients identified by the American Academy of Pediatrics that are critical for fetal, infant, and toddler neurodevelopment.¹ Furthermore, milk and dairy food nutrients such as protein, calcium, vitamin D, vitamin B12, potassium, iodine, choline and zinc work together to provide multiple health benefits, including optimal brain,¹ bone,² muscle, immune and microbiome development³ and a reduced risk of developing chronic diseases such as type 2 diabetes and heart disease later in life.⁴

In addition to providing a wide variety of nutrients that contribute to overall health, dairy foods have complex food matrices and multiple bioactive components, including proteins, lipids, micronutrients and probiotics (in fermented dairy foods such as cheese and yogurt), that provide additional functional benefits and further explain dairy's positive impact on diet quality and metabolic health.⁵

Diet quality during pregnancy and early life impact microbiome development in the gastrointestinal tract, playing an important role in immune, endocrine and metabolic function. During this period, environmental impacts such as nutrition insecurity can disrupt optimal microbial growth, which may contribute to lifelong health implications, including delayed motor skills and neurodevelopment.³ Fiber-rich foods like fruits, vegetables, legumes and whole grains and fermented foods like kefir, yogurt and cheese play important roles in supporting a healthy microbiome.⁶ Milk, yogurt and cheese improve nutrition security and are an important part of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) food packages because they provide key nutrients and other functional components that contribute to physical growth and optimal health and well-being for pregnant women, young children, and breastfeeding mothers.

Dairy's Nutrient Package Is Difficult to Replace

Leading health experts agree that water and plain milk are the only recommended beverages for children 1 to 5 years of age.⁷ Unsweetened, fortified soy beverage is recommended if a child has a dairy allergy or to accommodate vegan preferences. Other plant-based alternatives are not recommended due to their wide variability in nutrient content, limited evidence of bioavailability and impact on diet quality and health outcomes. When compared with plant-based beverages, dairy milk has the most balanced distribution of energy from carbohydrates, protein and fat, coupled with a unique nutrient package. Unlike dairy milk, plant-based beverages like soy and almond are not good sources of iodine, a nutrient of concern for pregnant and lactating women.⁸ What children drink from birth through age 5 can have an impact on health since beverages make a significant contribution to dietary intake during this critical period.⁷ Fortified plant-based beverages do not provide a complete replacement of milk, and an overall diet adjustment may be needed to ensure adequate intake of key nutrients if plant-based beverages are substituted in the diet.⁹ Lactose-free milk, yogurt and cheese offer the same unique nutrient package that supports child growth and development while meeting diverse dietary needs.

Access to Nutrient-Dense Dairy Foods Improves Nutrition Security

Research has shown that participation in WIC is associated with better diet quality.¹⁰ Nutrient-dense dairy foods are central components of the WIC food packages for women and children and have been so throughout the program's history. Removing cheese as a

food category from the fully breastfeeding food package could limit access to calcium, high-quality protein and other important nutrients that contribute to nutritionally balanced meals for lactating parents. A recent USDA Food and Nutrition Service study on WIC cost containment showed that cheese was redeemed at a higher rate (70.4 percent) than any other WIC food except eggs, while milk and yogurt were also redeemed at higher rates than non-dairy substitutes and tofu.¹¹ Acknowledging participant food preferences will support improved dietary patterns, as cheese and other nutrient-dense dairy foods can be incorporated into a wide variety of culturally relevant meals to improve diet quality and achieve nutrition security. The proposed decrease in monthly milk allowances further necessitates the continued inclusion of cheese as a food category for breastfeeding parents, as it makes an important contribution to the increased protein and calcium needs of this important life stage.

Although reducing maximum monthly allowances of milk is intended to reaffirm WIC's role as a supplemental program, reduction may negatively impact nutrition security of pregnant women, infants, and children. Milk, cheese, and yogurt's distinct contribution to physical and cognitive development combined with palatability and popularity in the program exemplified by higher redemption rates compared to other package components¹¹ supports nutritious dietary patterns during a critical window of growth.

Recommendation:

Dairy Council of California recommends considering the diverse dietary preferences of pregnant women, infants, and children while putting forth recommendations that are evidence-based and meet the unique nutrient needs of these important life stages. Milk, yogurt and cheese offer a unique package of nutrients, including calcium, vitamin D, vitamin B12, potassium, choline, iodine, zinc and more, that work together to provide multiple health benefits, including optimal growth and development in children and reduced risk of chronic diseases such as type 2 diabetes and heart disease later in life. Policy changes that decrease or limit access to nutrient-dense foods like milk, yogurt and cheese may impact short- and long-term health outcomes, especially for under-resourced populations.

We thank you for the opportunity to submit these comments.

Best Regards,



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