



**NATIONAL POTATO COUNCIL**

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February 21, 2023

*Via Regulations.gov*

Allison Post  
Chief, WIC Administration  
Benefits, and Certification Branch, Policy Division  
Food and Nutrition Service  
P.O. Box 2885  
Fairfax, Virginia 22031-0

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

Dear Ms. Post,

The National Potato Council (NPC) is pleased to provide the following comments to the US Department of Agriculture's (USDA) Proposed Rule on Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Revisions in the WIC Food Packages.

NPC is the voice of U.S. potato industry and our growers and processor members are partners in delivering nutrition through the WIC Program. Potatoes are an important vegetable in the American diet, which is why NPC members are pleased to provide them as a WIC-eligible vegetable. As a highly versatile and cost-effective vegetable, potatoes play a valuable role in meeting nutritional needs of WIC mothers and children.

NPC is supportive of USDA's approach to better align the WIC food package with the 2020-2025 Dietary Guidelines for Americans. NPC asks USDA to consider the following.

- Finalize white potatoes' WIC eligibility without any limitations
- Finalize USDA's proposed increase of the CVV maximum monthly allowances for fruits and vegetables
- Require State agencies to authorize fruits and vegetables in "all forms"
- Allow all fresh fruits and vegetables regardless of package size

- Consider flexible approaches to increase vegetable intake through permitting small amounts of additives in vegetable products
- Provide WIC education focused on increasing fruit and vegetable consumption

**NPC strongly supports USDA’s proposal to codify that white potatoes are WIC eligible without limitations**

NPC applauds USDA’s clarification that potatoes can be purchased without limitation through WIC cash value vouchers (CVV). This clarification is in line with the Institute of Medicine report<sup>1</sup> that found, “nutrient profile of white potatoes does not support their exclusion from the CVV because their nutrient content is similar to that of other starchy vegetables included in the CVV.” IOM went on to describe that, “increased consumption of white potatoes could improve potassium intake for both women and children.” A more recent study confirmed that the consumption of white potatoes improves potassium for all WIC demographics except formula fed (FF) infants 0--6 months for both women and children.<sup>2</sup>

Given the fresh white potato allows WIC participants to affordably add two nutrients of concern to their diets and increase the positive value of their cash value vouchers, NPC recommends USDA finalize white potatoes’ WIC eligibility without any limitations.

**NPC supports increased allotments for fruits and vegetables**

NPC supports the USDA’s proposed increase of the CVV maximum monthly allowances for fruits and vegetables to provide increased amounts for participants (i.e. \$24 for child participants, \$43 for pregnant and postpartum participants, and \$47 for partially (mostly) and fully breastfeeding participants).

The *2020-2025 Dietary Guidelines for Americans (DGA)* emphasize building healthy eating patterns with recommended amounts of fruits and vegetables early in life.<sup>3</sup> According to a 2020 Produce for Better Health Foundation fruit and vegetable consumption has declined by about 10% since 2004<sup>4</sup> and the DGA’s confirm most people are not eating enough fruit and vegetables by age 2.<sup>2</sup> However, a 2022 USDA study show participants who consistently receive WIC benefits for four years have, on average, three more Healthy Eating Index (HEI) points compared to those who discontinued WIC

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<sup>1</sup> Institute of Medicine Review of WIC Food Packages An Evaluation of the White Potato in Cash Value Voucher. <https://nap.nationalacademies.org/catalog/20221/review-of-wic-food-packages-an-evaluation-of-white-potatoes>. 2015

<sup>2</sup> Storey M. Vegetable consumption and selected nutrient intake of women of childbearing age. *J Nutr Educ Behav* 2016.

<sup>3</sup> US Dietary Guidelines for Americans, 2020-2025. [https://www.dietaryguidelines.gov/sites/default/files/2021-03/Dietary\\_Guidelines\\_for\\_Americans-2020-2025.pdf](https://www.dietaryguidelines.gov/sites/default/files/2021-03/Dietary_Guidelines_for_Americans-2020-2025.pdf). 2020.

<sup>4</sup> Produce For Better Health Foundation. 2020 PBH State of the Plate: America's Fruit & Vegetable Consumption Trends. 2021.

participation after the first year.<sup>5</sup> Moreover, in a study of WIC participants approximately one-fourth said they increased fruit and vegetable intake.<sup>6</sup>

Temporary increases in WIC Cash-Value Voucher/Benefit (CVV/B) for fruit and vegetable purchases have allowed more participants to have more access to vegetables, including potatoes, in the program. Given the WIC programs tremendous reach and impact on early feeding, NPC urges USDA to make CVV maximum monthly allowance increases permanent.

### **NPC recommends requiring State agencies to authorize fruits and vegetables in “all forms”**

NPC recommends USDA increase the number of forms of potatoes allowed for CVV redemption in the WIC program. While we appreciate USDA’s approach requiring State agencies to authorize at least one other form of fruits and vegetables in addition to fresh, NPC suggests that USDA expand this requirement for State agencies to authorize all forms of fruits and vegetables, including fresh, frozen, canned, and dried (or dehydrated), for CVV redemption. While maintaining nutrient profiles, these additional form options will allow participants to choose healthy fruits and vegetables that meet the needs of family food choices, cultural preferences, and also address key challenges of fresh fruit and vegetable consumption.

Consumer research from the Produce for Better Health Foundation<sup>7,8</sup> shows a top challenge of fruit and vegetable consumption is spoilage. Allowing all forms will decrease food waste and may increase likelihood of consumption given frozen, canned, and dried (or dehydrated) products have longer shelf lives. Another common difficulty expressed in the consumer research were lack of preparation skills. By providing a variety of fruit and vegetable forms, including those are already precut or chopped, these hurdles may be addressed. The Foundation’s report also indicated physical limitations, such as digestive difficulties and chewing, were barriers to fresh fruit and vegetable consumption. Providing options, like dehydrated potatoes, which can be easily made into mashed potatoes, or canned products that are inherently softer, may assist WIC participants facing these specific challenges.

By allowing all forms, WIC families can more easily prepare convenient and affordable meals, while also maintaining quality and vitamins, minerals, and antioxidants available in their fresh

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<sup>5</sup> USDA. Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Participant and Program Characteristics 2020 (Summary) <https://fns-prod.azureedge.us/sites/default/files/resource-files/WICPC2020-Summary.pdf>. 2022.

<sup>6</sup> USDA. Special supplemental nutrition program for women, infants, and children (WIC) infant and toddler feeding practices study 2: Fourth year report (Summary). <https://fns-prod.azureedge.us/sites/default/files/resource-files/WIC-ITFPS2-Year4Report-Summary-update.pdf>. 2020

<sup>7</sup> Produce for Better Health Foundation. Primary Shoppers' Attitudes and Beliefs Related to Fruit & Vegetable Consumption - 2012-2016. Available here: <https://fruitsandveggies.org/wp-content/uploads/2020/08/PrimaryShopperReport2016WEB.pdf>

<sup>8</sup> Produce for Better Health Foundation. Novel Approaches to Measuring and Promoting Fruit and Vegetable Consumption, 2017. Available here: <https://fruitsandveggies.org/wp-content/uploads/2019/04/Novel-Approaches-Executive-Summary.pdf>

counterparts. NPC recommends USDA require states to increase availability of fruit and vegetables in all forms.

### **NPC suggests USDA allow all fresh fruits and vegetables regardless of package size**

NPC suggests USDA allow all packages of fresh fruits and vegetables, regardless of package size, to be WIC-eligible. By authorizing a variety of package sizes this will increase variety and choice, while still providing participants with package sizes that ensure they can receive the full benefit amount.

### **USDA should consider flexible approaches to increase vegetable intake through permitting small amounts of additives in vegetable products**

NPC requests that USDA consider flexible approaches to increase vegetable intake through permitting small amounts of additives, such as preservatives, in vegetable products. As the agency considers the benefits of providing WIC participants fruit and vegetable in all forms, including frozen, canned, and dried (or dehydrated) products (as outlined above), it should also consider allowing small amounts of additives used to preserve or maintain freshness. As FDA outlines, “preservatives slow product spoilage... In addition to maintaining the quality of the food, they help control contamination that can cause foodborne illness... One group of preservatives -- antioxidants -- prevents fats and oils and the foods containing them from becoming rancid or developing an off-flavor.”<sup>9</sup> They also can assist in preventing potatoes from turning brown when exposed to air. Use of preservatives is important across potato products in all forms including frozen diced potatoes, dehydrated mashed potatoes (to maintain freshness) and canned fresh cut potatoes (to maintain color). In most cases, use of these additives is even described on the Nutrition Facts Label for consumers. Adoption of an “all forms” policy, which also allows small amounts of additives, may increase consumption of vegetables by WIC participants. NPC recommends USDA permit small amounts of additives in vegetable products.

### **USDA should provide WIC education focused on increasing fruit and vegetable consumption**

NPC supports the continued efforts of USDA to provide nutrition education to help WIC participants build healthy diets. We understand that 92 percent of mothers participating in WIC during their child’s fourth year value both the supplemental foods provided, but also WIC’s nutrition education. Given these program benefits might contribute to higher diet quality scores among continuous participants,<sup>10</sup> USDA must consider not only an increase to the fruit and vegetable benefit, but also consider strategies to increase consumption. The Produce for Better Health Foundation has reviewed behavioral science, consumption data, policies, and research to develop recommendations for making it easier for Americans to adopt and sustain fruit and vegetable

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<sup>9</sup> Food and Drug Administration.. Overview Food Ingredients, Additives, and Colors.

<https://www.fda.gov/food/food-ingredients-packaging/overview-food-ingredients-additives-colors>. 2018.

<sup>10</sup> Borger C et al. WIC Infant and Toddler Feeding Practices Study-2 Fourth Year Report. Prepared by Westat, Inc. for USDA Food and Nutrition Service, September. 2020.

consumption habits. NPC recommends USDA and its WIC education experts review this report<sup>11</sup> and consider incorporation of educational resources and recommendations that could positively impact fruit and vegetable consumption of the WIC population.

Thank you for the opportunity to comment and your consideration of our recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Kam Quarles". The signature is fluid and cursive, with the first name "W." and last name "Quarles" clearly distinguishable.

W. Kam Quarles  
Chief Executive Officer  
National Potato Council

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<sup>11</sup> Produce for Better Health Foundation. Hacks to Habits: A behavioral research study to bolster fruit and vegetable consumption Insights Report. <https://fruitsandveggies.org/wp-content/uploads/2022/09/PBH-Hacks-To-Habits-Insights-Report-2022-1.pdf>. 2022.