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May 1, 2009

Mr. Rick Chiat
Minnesota Department of Health
WIC Program
85 East Seventh Place
PO Box 64882
St. Paul, MN 55164-0882

RE: Minnesota WIC Program

Dear Mr. Chiat:

It has come to my attention that the Minnesota Department of Health has modified its position on the types of processed fruits and vegetables it will allow in the Minnesota WIC program based on sugar content. I am disappointed to hear this and urge the Department to reconsider its position.

The Minnesota Agri-Growth Council represents food and agriculture industry stakeholders including farmers, food processors, vegetable canning companies, and food retailers. Minnesota farmers and processors grow and process a large percentage of the processed sweet corn, green peas, and snap beans in the nation. Minnesota is also home to the "Valley of the Green Giant" and well respected for the nutritious, affordable, and abundant products produced by our state's processed vegetable industry.

The proposed policy to exclude from the Minnesota WIC program processed, canned, and frozen fruits and vegetables that contain added sugar will take away an important, nutritious, and affordable food choice for many needy families.

The U.S. Department of Agriculture (USDA) has made it very clear that canned and frozen vegetables with added sugars are allowed in state WIC programs. In a "Frequently Asked Questions" (FAQ) document updated on December 12, 2008, USDA states,

It has come to the attention of the Food and Nutrition Service that the requirement for "no added sugar" in canned vegetables may exclude some commonly consumed foods from WIC State food lists. FNS has learned from the Food and Drug Administration that small amounts of sugar are added to some foods that are naturally sugar-containing during the canning process to prevent stress resulting in membrane rupture (i.e. sweet peas). This small amount of added sugar is minimal and helps to maintain the quality and structure of the food. To encourage greater variety in food choices in the WIC food packages, canned vegetables that contain a small amount of sugar for processing purposes, such as plain canned sweet peas and corn, are allowed. (Emphasis added.)

A similar USDA FAQ sheet was prepared for legumes, with similar conclusions.

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If the Minnesota WIC program ignores recommendations by the federal government and other food nutrition experts and eliminates processed fruits and vegetables with added sugar, an estimated 45% of all canned vegetables will be ineligible for the program. This severely limits options for WIC recipients.

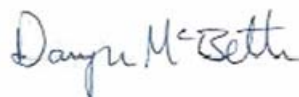
WIC participants should be allowed to use the WIC food vouchers to select the fruits and vegetables that provide the best nutritional value, bargain and choice for themselves and their children. Sweet peas, green beans, sweet corn and beans are healthy foods in fresh and processed forms. They are available for part of the year in fresh form and available all year in processed form. Processed fruits and vegetables allows for a wider selection of fruits and vegetables, as well as familiar choices to be accessible.

The Agri-Growth Council strongly supports the goal of the WIC program which is to help provide affordable, safe and healthy food to women and children who qualify for the program. Eliminating frozen, dried and canned fruits and vegetables from the program because of sugar levels limits options and opportunity for WIC participants.

We respectfully urge the Minnesota WIC program to reconsider its position and allow frozen, dried and canned fruits and vegetables, with sugar added, to be eligible in the Minnesota WIC program. By doing so the department will give healthy, affordable options to WIC recipients while promoting a product that is produced and processed locally.

Thank you for the opportunity to provide comments. If you have any questions, please contact me at 651-905-8900 or daryn.mcbeth@agrigrwth.org.

Sincerely,



Daryn McBeth.
President

cc: Betsy Clarke, WIC Director