

**Congress of the United States**  
**Washington, DC 20515**

February 22, 2006

The Honorable Eric M. Bost  
Undersecretary  
US Department of Agriculture  
Office of Food and Nutrition, and Consumer Services  
1400 Independence Ave, S.W.  
Washington, DC 20250

Dear Undersecretary Bost:

We would like to take this opportunity to share our thoughts on changes to the Women, Infants and Children (WIC) nutritional packages currently under review. Specifically, we wish to bring to your attention policy issues surrounding the current WIC regulations that have largely excluded cranberry products with their associated nutritional and health benefits.

As you know, the nutritional packages provided through WIC have remained largely unchanged since the program's inception in 1974. The current list of products and parameters for inclusion are very restrictive. For example, the narrow list of food item options and packaging sizes, which vary state to state, limit the inclusion of a wide variety of fruit and vegetable products. These limitations prevent the WIC food package from meeting regional and ethnic preferences, as well as fail to reflect the Dietary Guidelines for Americans, guidelines that have been modified six times in the past 15 years.

In the past, juice products included in the WIC food package have been primarily restricted to 100% single flavor juices, such as apple, grape and orange, with a limited number of states allowing multi-flavor juices. The intent has been to optimize nutrient density, and this is laudable. However, pure cranberry juice is compositionally quite different from other juices. It is much higher in acid and lower in sugars than most other fruit juices, similar to lemon and lime juices. Low-sugar, high-acid juices, such as cranberry, require sweetening to be palatable. Sweeteners can include fruit juices such as white grape juice, and high intensity and lower calorie sweeteners, such as sucralose and high fructose corn syrup.

Research has shown that cranberry juice has a range of positive nutritional benefits. The health benefits for women are particularly striking. A growing body of research has shown that cranberry beverages, including cranberry juice cocktail and 100% cranberry juice blends, can significantly reduce the incidence of urinary tract infections (UTIs).

UTIs present a serious health problem, considered to be the most common bacterial infection, and account for more than 11 million physician visits annually in the United States. UTIs in pregnant women present special problems, due to increased risks of both

pregnancy and perinatal complications. Given the inherent urinary tract health benefits, cranberry beverages are ideal candidates for the WIC food packages for women, especially pregnant, post partum, and breast-feeding women. By determining the nutritional content of juice solely by a 100% juice standard, the nutritional qualities and benefits of cranberry juices and juice drinks are not accounted for appropriately.

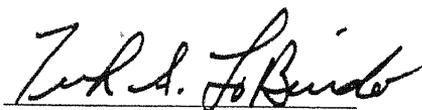
As the US Department of Agriculture begins consideration of modifications to the current package, we would appreciate your consideration of the unique health benefits provided by cranberry juice and the present barriers to its entry into the WIC program. While cranberry juice cocktail provide the same nutritional benefits as other 100% single strength products, they are not allowed into the WIC program. Moreover, only nine states authorize 100% blended cranberry juice products. Also, to date even though obesity among children and adults has become a growing epidemic, the WIC program does not allow reduced calorie cranberry juice products, which have two-thirds less calories than 100% juice, or juice cocktails, but provide the same benefits. We encourage consideration of whether reduced calorie juice products can play a role in WIC.

In addition to these barriers, packaging restrictions have also limited the availability of cranberry juice to WIC participants. Under the current WIC regulations, a majority of states require that the product be in 46-oz cans or frozen concentrate, with a limited number of states allowing 46-oz plastic bottles or liquid concentrate. By focusing on these outdated packaging options, the WIC program eliminates many juice products from consideration. In the beverage industry and more specifically, the cranberry industry, the most prevalent package is 64-oz plastic containers. These re-sealable containers are a significant improvement over cans and result in less wasted product.

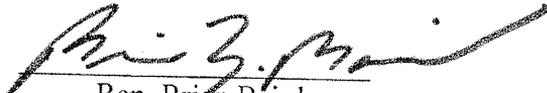
Given the demonstrated nutritional benefits of cranberry juice products and current barriers to the WIC program, we ask that you fully examine the value of making cranberry juice products available to WIC participants. The WIC program's success depends upon continuation of food packages targeted to meet nutrient needs to improve pregnancy outcomes and promote normal infant and child-development. We certainly support these laudable goals and look forward to working with you as the Department continues its efforts to improve this important program.

Thank you for your attention to this important matter.

Sincerely,

  
Rep. Frank LoBiondo

  
Rep. William Delahunt

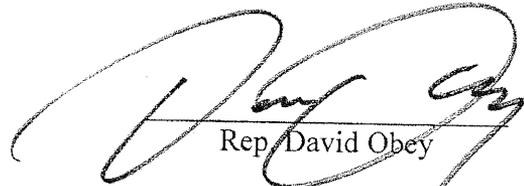
  
Rep. Brian Baird

  
Rep. Bob Filner

  
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