



1 February, 2010

Debra Whitford
Director, Supplemental Food Programs Division
Food and Nutrition Service
U.S. Dept of Agriculture
3101 Park Center Drive, Room 528
Alexandria, VA 22302

RE: Docket ID Number 2006-0037, WIC Food Packages Interim Rule

Dear Mr. Whitford,

I am submitting these comments on behalf of the National Sustainable Agriculture Coalition (NSAC), a coalition of 39 rural development, family farm, conservation and food security organizations around the U.S. that promote healthy, economically vibrant rural communities, sustainable agricultural production systems, and family-based farms and ranches. We have been longtime supporters of the WIC program and many of our groups represent farmers participating in the Farmers' Market Nutrition Program for WIC participants. We believe that the cash value vouchers (CVV) are an important improvement to the WIC package and create an opportunity to stimulate rural economies and support family farms while ensuring that WIC families receive the freshest, most nutritious fresh fruits and vegetables available. We endorse the recommendations made by the Community Food Security Coalition and ask that you consider several additional opportunities to maximize the nutritional and economic benefits of the program.

1) USDA can take a step to remedying the food desert problem by requiring states to certify farmers' markets as authorized retailers and harmonizing the CVV redemption process with the processes used for Farmers' Market Nutrition Program coupons. WIC CVV represent \$500 million per year in fruit and vegetable purchases nationwide. We know that many WIC participants live in rural and urban food deserts and face hardship accessing affordable, nutritious food. Farmers markets and farmstands can fill that void, bringing farm-fresh product to WIC neighborhoods without requiring the expensive overhead of supermarkets. The CVV create a market substantial enough to be viable for farmers and can be an important first step to creating market mechanisms to regularly provide these neighborhoods with nutritious, affordable fresh fruits and vegetables.

2) The Food and Nutrition Service (FNS) should keep data on CVV use in farmers markets. Data on CVV use in farmers markets could provide useful information on where nutrition programs are working with rural development and marketing efforts and what is making the collaboration successful. This information can inform the Healthy Food Financing Initiative and offer lessons for regional rural development projects.

3) FNS should permit market managers to be certified for the various farmers selling in markets in order to facilitate the use of CVV in mobile, accessible farmers' markets.

Making it as easy as possible for farmers to sell directly to WIC participants while preserving accountability will improve the nutritional benefits of the WIC program, make it easier to use for participants and allow each food dollar to offer an additional dollar in family farm and rural development support.

4) Maintaining records on the number and value of CVV used for fresh as opposed to frozen or canned fruits and vegetables is critically important information for assessing the true nutritional value of the vouchers and better understanding the stores in which the vouchers are used. We encourage FNS to collect this information.

Thank you for all the good work that the Food and Nutrition Service does and for the opportunity to comment on the WIC Food Package Interim Rule. If you have any questions please do not hesitate to contact me.

Best regards,

Kate Fitzgerald

Kate Fitzgerald
Senior Policy Associate