

GERBER Products Company – “*What’s Best for Baby*” Meeting with OMB and USDA

Background:

For eighty years, Gerber has been a trusted partner in helping parents raise happy, healthy babies. Gerber has extensive expertise developing and manufacturing nutritious, developmentally appropriate foods for infants and toddlers. The company’s high-quality product line covers each phase of childhood development and offers foods with diverse flavors, textures, and optimum nutritional value¹. Gerber is dedicated to understanding, listening, and responding to the needs of parents and their babies.

With its commitment to always do “What’s Best for Baby,” Gerber has earned the loyalty of parents across the nation – garnering over eighty percent market share². The company takes pride in being a leading voice for improving infant nutrition and has a long standing commitment to and participation in the supplemental nutrition program for women, infants, and children (WIC). Given Gerber’s history with WIC and its trusted reputation with parents, Gerber is in a unique position to make thoughtful recommendations for WIC program improvement.

Proposed Rule Revising WIC Food Packages:

In 2002, Gerber sponsored the largest dietary intake survey of American infants and toddlers called FITS, “The Feeding Infants and Toddlers Study.” Twenty-one peer-reviewed scientific papers have been published from this study. The groundbreaking research in FITS was cited extensively in the National Academy of Science’s Institute of Medicine report, “WIC Food Packages: Time for a Change.” This report became the clarion call for much of the good policy proposed in the interim rule.

Because updating the food packages in WIC is truly “what’s best for baby,” Gerber strongly supports the spirit and the letter of the rule’s proposed revisions, with the exception of a few minor suggestions outlined below.

Gerber strongly recommends the following changes to the rule to assure maximum benefits from the new guidelines:

► Broaden the voucher policy to include all fruits and vegetables for infants

Gerber applauds the proposed rule’s recommendation to add fruits and vegetables and whole grains to the WIC food packages for the first time. The addition of fresh, frozen,

¹ Gerber’s strict quality standards ensure they know the 10-history of every farm producing a commodity for its products. Gerber also employs other top-rated agricultural standards that include: sustainability; strict soil analysis and seed selection; rigid toxicology standards that are as much as 100 times stricter than government regulation; allergen programs; in-house screening for sorting best produce; and manufacturing processes registered with the FDA and USDA.

² In addition to its market share percentage serving as a proxy for consumer / parental trust, Gerber’s Parent Resource Center averages one million annual contacts.

canned, and pureed fruits and vegetables updates the voucher program to represent the full array of acceptable feeding options for toddlers and preschool children. However, Gerber's research in feeding behavior, developmental readiness, and best nutrition practices support a compelling argument for an even broader fruit and vegetable policy for infants as well. The proposed rule limits fruit and vegetable options to purees (including infant meats) and fresh bananas for infants under age 12 months. While puree is an important part of an infant's diet, many parents supplement puree feeding with other fruit and vegetable formats, making the proposed rule less robust for infants than actual consumer behavior. This limited policy also fails to account for the broad variability in infant developmental rates, which makes the transition to table-food unique to each infant. By broadening the voucher policy to include more fruit and vegetable options for infants, the decision regarding an infant's readiness to transition from purees to fresh, canned, or frozen fruits and vegetable rests where it should: with the parents.

► Calculate monthly allowance on a container basis rather than an ounce basis

The proposed calculation based on 4-ounce jars no longer accurately reflects the current marketplace. According to the Regulatory Impact Statement, this proposal is based on IOM assumptions that relied on a 2002 survey using Gerber container sizes over a 6 month period. However, between 2002 and 2006, infant food packaging and package sizing became more variable. During this period, Gerber launched a 3.5 ounce container size, which is now the size most widely available to consumers (not 4-ounce jars as required in the rule). To tie the allowance to a set monthly ounce calculation rather than to count an individual container is both difficult to understand for the WIC participant and difficult to administer for the WIC vendor.

Failure to change the calculation of monthly allowance to a container basis would cause an extreme administrative burden for Gerber and would have unintended consequences on cost neutrality and efficient nationwide distribution goals of the WIC program.

In addition, this technical correction would make it unnecessary to have a rounding rule and would likely result in lowering costs to the program.

► Clarify definition of "single ingredient" infant meat and adopt a nutrient-based standard

Gerber applauds the rule's proposal to allow commercial infant food meat for fully breastfed women in Food Package II. However, the infant meat definition's use of the term "single ingredient" creates unnecessary confusion³. Literally read, this would mean that an infant meat product could only contain the meat component itself, without any additional ingredients whatsoever. Strict adherence to such a narrow definition of "single ingredient" would be a practical impossibility given that single ingredient meats are not presently available in the marketplace without at least some additional broth, water, lemon juice and/or starch.

³ 71 Fed. Reg. at 44821 and n. 12.

Further scrutiny of the preamble provides some additional clarification of intent when it outlines among authorized infant foods “any variety, single ingredient, of commercial infant food meat with broth or with gravy.”⁴

The rule itself should clarify this confusion by defining infant meats to include broth or gravy (and the ingredients used to make broth or gravy). Gerber is the only nationally available brand of infant meat and our formulations contain minimal amounts of starches in the gravy to enhance texture and lemon juice to preserve coloring. Given the longstanding practice of incorporating low levels of lemon juice and appropriate starches in the formation of these products, we would recommend that the categorical exclusion of starches from this definition be eliminated.

Gerber further recommends that WIC adopt an “infant meat” requirement that is nutrient rather than ingredient based. We recommend that the final definition specify that such infant meats contribute to the diet a minimum amount of 6 grams of protein from meat or poultry per serving.⁵

⁴ 71 Fed. Reg. at 44793

⁵ If these recommendations are followed, a final definition of “infant meat” would read as follows: *Any variety of commercial infant, meat food, or poultry product without added sugars, vegetables, or salt (i.e. sodium). Such products shall contain at a minimum, 6 grams of protein from meat or poultry per serving. (The clarifying footnote would continue to be attached, which states, “No infant food combinations (e.g. meat and vegetables) or dinners (e.g. spaghetti and meatballs) are allowed.)*