



GEORGIA MILK PRODUCERS, INC.
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United States Department of Agriculture
Food & Nutrition Service
Braddock Metro Center II
1320 Braddock Place
Alexandria, VA 22314

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RF: Docket No. FNS-2022-0007

On behalf of the Georgia Milk Producers, Inc. Board of Directors and the dairy farmers of Georgia, these comments are being submitted on the proposed rule entitled “Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Revisions in the WIC Food Packages” published in the Federal Register on November 21, 2022.

The Georgia Milk Producers, Inc. is the trade association for dairy farmers in Georgia representing 90 dairy farms and the families that make up our dairy industry. We support the positive changes in the proposed rule, —such as requiring the authorization of lactose-free milk, allowing reduced-fat yogurts for one-year olds, and providing for flexibility for container size of yogurt—but the proposal to reduce the maximum monthly allowance within the “milk” category will have a negative impact on the health outcomes of WIC participants in our home state of Georgia and across the country.

Dairy products are nutrient dense foods that provide incredible nutritional benefit per serving. Just one glass of milk offers thirteen essential nutrients including calcium, potassium, and vitamin D (three of the four nutrients of public health concern as set by the Dietary Guidelines for Americans). Fluid milk, cheese, and yogurt all support bone and immune health in people of all ages in addition to their ability to protect against type II diabetes, hypertension and stroke, cardiovascular disease, and obesity.

The health benefits of dairy are even more pronounced for participants of the WIC program. Dairy provides seven of the fourteen vital nutrients for brain development in young children as identified by the Academy of Pediatrics. Furthermore, the Dietary Guidelines for Americans states that women who do not regularly consume dairy products (as well as eggs, seafood, or iodized table salt) may not be consuming enough iodine to ensure sufficient neurocognitive development of the fetus. One serving of milk provides sixty percent of the daily value for iodine. By decreasing the monthly allotment for dairy, the proposed rule actually decreases access to nutrients that are critical for the life stages covered under WIC.

The WIC program is an essential tool for improving health outcomes and nurturing families. It is also a tool relied upon mostly by traditionally underserved and food insecure communities in our state. Any change to access under the WIC program would have a significant impact on the overall health and wellbeing of our population. While there are some positive items in the overall proposal, we urge USDA not to reduce the maximum monthly allowance for dairy.

Sincerely,

Bryce Trotter
Executive Director
Georgia Milk Producers, Inc.