



**Food Research & Action Center**  
1200 18th Street, NW, Suite 400  
Washington, DC 20036  
202.986.2200

February 21, 2023

Allison Post, Chief  
WIC Administration, Benefits, and Certification Branch  
Policy Division  
FNS, USDA  
1320 Braddock Place, 3rd Floor  
Alexandria, VA 22302

RE: Docket RIN 0584-AE82, Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Revisions in the WIC Food Packages

Dear Ms. Post:

The Food Research and Action Center (FRAC) commends U.S. Department of Agriculture (USDA) on the proposed *Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Revisions in the WIC Food Packages*<sup>1</sup> rule. Overall, the rule will support equitable access to nutritious food by improving the nutritional quality of the foods offered, making the program more client-centered, and increasing the value of the WIC food packages.

FRAC works to improve the nutrition, health, and well-being of people struggling against poverty-related hunger in the United States through advocacy, partnerships, and advancing bold and equitable policy solutions. More than 50 years ago, FRAC was instrumental in the creation and expansion of WIC. We continue to partner with our state network, national partners, and the WIC community to strengthen and expand WIC.

The proposed evidence-based rule is consistent with the 2020–2025 Dietary Guidelines for Americans (DGA)<sup>2</sup>, and the National Academy of Sciences, Engineering, and Medicine (NASEM) report, “Review of WIC Food Packages: Improving Balance and Choice.”<sup>3</sup> The proposed rule will enhance WIC’s role in supporting participants and communities.

A very large body of research shows that WIC is a profoundly important program with well-documented benefits for infants, children, pregnant clients, and their families.<sup>4</sup> Research shows that WIC improves participants’ health and well-being, dietary intake, and birth and health outcomes; protects against obesity; and supports learning and development. WIC benefits are cost-effective, generating major savings in federal, state, local, and private health care. Studies demonstrate that WIC improves food and economic security of participants by reducing food insecurity, helping to alleviate poverty, and supporting economic stability.

WIC can also be a powerful tool in creating healthier, more equitable communities. The last major revision of the WIC food package demonstrated that WIC has the potential to improve the availability of healthy foods in communities with low-income for all shoppers.<sup>5</sup> The WIC food package improves the variety and availability of healthy foods in grocery stores authorized to redeem WIC benefits. In addition to improving the dietary intake and health of participants, WIC interjects much-needed funds into a community's food economy.

WIC has a substantial reach - serving 6.2 million participants each month. More families with young children are taking part in WIC, according to FRAC's report, *WIC During COVID-19: Participation and Benefit Redemption Since the Onset of the Pandemic*.<sup>6</sup> Driven by pandemic-related enhancements (streamlined access and increased fruit and vegetable benefits) to WIC, there was a significant 8.7 percent increase in WIC participation among children from February 2020 to February 2022. This trend continues. However, there is still room for improvement. WIC only serves an estimated 50.2 percent of those eligible for the program.<sup>7</sup> The proposed new WIC food package rule is an important next step toward improving WIC participants' health, addressing health inequities, and ultimately helping to end hunger in this country.

## Proposed Rule Section A. Fruits and Vegetables

**FRAC applauds USDA for proposing to permanently increase the value of the fruit and vegetable benefit** each month starting from \$9 to \$25 for children and from \$12 to \$44-\$49 for pregnant and postpartum participants. Families have been clear — this WIC fruit and vegetable increase is a vital resource. Children enjoy the fruits and vegetables throughout the year. The enhanced benefits support clients in meeting their nutritional needs during pregnancy, breastfeeding, and postpartum. (Increase CVV Maximum Monthly Allowances for Child, Pregnant, Breastfeeding and Postpartum Participants (§ 246.10(e)(10) and (11), Tables 2 and 3))

The positive impact of the enhanced fruit and vegetable benefit is evident in the increased benefit redemption food costs after the onset of the benefit enhancements. In the year since the start of the increased fruit and vegetable benefit (June 2021–May 2022) WIC benefit redemptions infused \$3.2 billion into local economies, \$476 million (17.7 percent) more than the previous year (June 2020–May 2021).<sup>8</sup> The Multi-State WIC Participant Satisfaction Survey published in March 2022 reported the importance of the benefit increase to participants eating a healthy diet. The report found that total daily fruit and vegetable intake increased by  $\frac{1}{3}$  cup from 2.01 cups before the increase to 2.31 cups after the increase.<sup>9</sup> Research in California confirmed that “Families with young children appear to benefit economically and nutritionally from the increased CVB by being able to purchase more types and amounts of vegetables and fruits”.<sup>10</sup>

The proposed rule's enhanced WIC fruit and vegetable benefit is consistent with the 2020–2025 Dietary Guidelines for Americans and the National Academy recommendations. Fruits and

vegetables provide fiber and vitamins important in the diets of WIC participants. Research clearly demonstrates that a diet rich in fruits and vegetables is associated with a reduced risk of high blood pressure, heart disease, overweight and obesity.

The need for the increased WIC fruit and vegetable benefit is clear. In the US, many young children have a low intake of fruits and vegetables. The Center for Disease Control and Prevention's (CDC) recently released analysis of the 2021 National Survey of Children's Health revealed: "During the preceding week, approximately one in three (32.1%) children did not eat a daily fruit, nearly one half (49.1%) did not eat a daily vegetable."<sup>11</sup> Increasing access to fruits and vegetables is an important equity issue because consumption differs by age, race and ethnicity, and household food sufficiency. The percentage of children who did not eat a daily fruit or vegetable was highest among Black children and lowest among White children. Children living in households with marginal or low food sufficiency were less likely to eat either a daily fruit or vegetable during the preceding week. Families eligible for WIC are often unable to afford fruits and vegetables on their own limited food budgets.

**FRAC believes the proposed rule to require "State agencies to authorize at least one other form of fruits and vegetables in addition to fresh"<sup>12</sup> will improve** client choice and accommodate a range of preferences, and storage facilities. (Require One Other Form of Fruits and Vegetables in Addition to Fresh (§ 246.10(e)(3)(v), (e)(4)(ii), (ii), (ii), and (ii), and (9) Through (11))

## **Proposed Rule Section B. Juice**

The proposed reduction in the amount of juice in the WIC food packages is reasonable given the increased fruit and vegetable benefits. This proposed change is consistent with the DGAs. (Reduce Maximum Monthly Allowance for Juice (§ 246.10(e)(10) and (11), Tables 2 and 3))

**FRAC endorses the client-centered proposed rule to allow WIC clients to choose to substitute \$3 CVV for the full juice amount.** (Allow CVV as a Substitute for Juice (§ 246.10(e)(10) and (11), Tables 2 and 3)) Clients may want to make the switch for a number of reasons including taste preferences or a seasonable opportunity to maximize the CVV benefits. Alternatively, clients may have reasons for keeping the juice benefit rather than exchanging it for the \$3 CVV, including child preference, the convenience of a shelf stable product, or ease of parsing out the servings to the participating child over time. Consistent with the NASEM, the proposed rule is structured to allow the client to make the choice.

**FRAC opposes the recommendation by other organizations to fundamentally change the proposed rule by setting the CVV as a default.** Given the reality of WIC operations, moving to a default would de facto make the \$3 CVV the benefit and not the juice.

## **Proposed Rule Section F. Breakfast Cereal, Section G. Whole Wheat Bread, Whole Grain Bread, and other Whole Grain Options, and Section C. Milk and Milk Substitutions**

**FRAC supports the proposed strong WIC nutrition standards which will increase access to whole grains (breakfast cereal, bread, and grains) and reduce the amount of sugar (yogurt and milks) consistent with the Dietary Guidelines for Americans.**

### **Increasing Whole Grains**

**The proposed new whole grain definition for breakfast cereals and bread is better suited for this purpose than the current definitions.** (Change Whole Grain Criteria for Breakfast Cereals (§ 246.10(e)(12), Table 4)) and (Change Criteria for Whole Grain Breads (§ 246.10(e)(12), Table 4)). The proposed new definitions will be easier to use.

**Increasing the whole grain foods available in the WIC food packages is consistent with the recommendations of the Dietary Guidelines for Americans to consume more whole grain products each day and to choose fiber-rich whole grains often.** (Require All Breakfast Cereals Meet Whole Grain Criteria (§ 246.10(e)(10) Through (12), Tables 2 Through 4)). The health benefits of whole grains are attributable not only to fiber but also to antioxidants, B Vitamins and minerals including copper, manganese, and selenium. Whole grain consumption has been associated with a lower risk of overweight and the many serious health problems that can arise as a result including type 2 diabetes, strokes, and heart disease.

Adequate whole grain consumption is a challenge for many Americans including women and children eligible for WIC. While most Americans meet recommendations for total grain intakes, 98 percent fall below recommendations for whole grains and 74 percent exceed limits for refined grains.<sup>13</sup> Whole grain consumption is impacted by income: the proportion of whole grains to total grains intake on a given day increased with increasing family income.<sup>14</sup>

### **Reducing Sugar**

**FRAC supports the proposed rule to reduce the total sugar limit for yogurt to 30 grams per 1 cup, permit only unflavored milk and reduce the sugar in soy-based beverages to not exceed 12 grams of added sugar per 8-oz. serving.** (Permit Only Unflavored Milk and Reduce Total Sugars Allowed in Yogurt and Soy-Based Beverages (§ 246.10(e)(12), Table 4))

Adults including women, and children exceed their recommended intake of added sugar. An analysis using NHANES 2017-2018 data found that added sugar consumption was high among 2- to 5-year-olds. The average added sugar intake was 13 teaspoons for non-Hispanic Black children, 12 teaspoons for non-Hispanic White children, 11 teaspoons for Hispanic children, and 7 teaspoons for non-Hispanic Asian children.<sup>15</sup> In 2017–2018, the average intake of added sugars was 15 teaspoons for women aged 20 and older.<sup>16</sup>

Limiting added sugar in the diet is urgent. Science increasingly shows the poor impacts of sugar on the health of adults and children.<sup>1718</sup> Among children, these health effects include childhood obesity, anxiety and depression, dental caries, and higher probability of obesity and other poor health outcomes later in life.

Compared to naturally occurring sugars in foods, added sugars are the main source of sugar in adult's and children's diet, particularly sweetened beverages, sweet bakery products, confectionary and dairy products.<sup>19</sup> Sugar reduction in beverages should be targeted. However, with the exception of soy milk, most authorized WIC beverages do not contain added sugar: WIC juice must be 100 percent unsweetened juice and most states do not offer flavored milk.

## **Proposed Rule Section G. Whole Wheat Bread, Whole Grain Bread, and other Whole Grain Options, Section C. Milk and Milk Substitutions, and Section I. Legumes and Eggs**

**FRAC approves of the proposal to maximize food choice to reflect dietary guidance and accommodate cultural and individual preferences, including traditional foodways, allergies, and vegetarian eating patterns. Expanding whole grains to include quinoa, blue cornmeal, and teff, and providing more substitution options for milk (yogurt, lactose-free milk, nondairy milk) and eggs, are positive changes.**

- Expanding allowable whole grains to include quinoa, blue cornmeal, and teff (Expand Whole Grain Options (§ 246.10(e)(10) Through (12), Tables 2 Through 4)) will provide client's greater choice to meet cultural food ways and diversify grain intakes.
- Providing more substitution options for milk (yogurt, lactose-free milk, nondairy milk) and eggs, are positive changes expanding vegetarian and vegan food, and allergy-free options. ((Require Authorization of Lactose-Free Milk (§ 246.10(e)(3)(10) Through (12), Tables 2 Through 4) and (Require Authorization of Legumes and Peanut Butter as Substitutes for Eggs and Allow State Agencies to Choose To Authorize Tofu To Substitute for Eggs (§ 246.10(e)(10) Through (12), Tables 2 Through 4))
- FRAC agrees with the Department, the proposed rule lifting current restriction to allow participants to substitute all three (cheese, yogurt, and tofu) in combination at their current substitution rates and current (1 pound of cheese; 1 pound of tofu) and proposed (2 quarts of yogurt) maximum substitution amounts will increase variety and choice for participants. (Increase Yogurt Substitution Amounts for Milk (§ 246.10(e)(10) and (11), Tables 2 and 3))
- FRAC supports the proposed calcium specification for tofu and vitamin D specification for yogurt. Fortification can help to establish nutritional equivalency for substitutions. (Add a Calcium Specification for Tofu and a Vitamin D Specification for Yogurt (§ 246.10(e)(12), Table 4))

- In addition, requiring States to offer both dried and canned beans will increase convenience and redemption for WIC participants. (Require Both Dried and Canned Legumes (§ 246.10(e)(10) Through (12), Tables 2 Through 4))
- In response to the Department’s questions regarding other non-peanut nut-butters, FRAC believes it is worthwhile to explore the option of adding other nut-butters if the products are unsweetened and meet the nutritional requirements. Other nut-butters are increasingly available in grocery stores.

## Proposed Rule Section J. Maximum Monthly Allowances

**FRAC believes the proposed revision to increase the allowable range of food package sizes and require more in-store options to improve the ease of shopping is client-centered and vital to reducing disparities in program delivery. Offering flexibility eliminates a barrier for families trying to fully redeem their WIC food package.**

FRAC offers the following recommendations in response to the Department’s request for *“public comment on requiring state agencies to authorize both package sizes that equal or add up to the maximum monthly allowance (to ensure participants have a pathway to receiving the full food benefits to which program participation entitles them) and package sizes that do not (to ensure greater variety and choice).”*

**Recommendation:** FRAC agrees with the Department’s goal of encouraging State agencies to provide participants with as much variety and choice as possible. FRAC believes strongly that WIC, as a federal nutrition program, should provide consistent robust benefits in all states. Some of these additional criteria in addition to “the minimum Federal requirements” can significantly limit the options WIC participants are offered. For example, some State WIC agencies implement strict rules narrowing food choices to the point that participation declines. In addition, state governments can be subject to political pressure from special interests including the powerful food producers in their state. State WIC agencies need rules they can use to protect the program from this kind of interference. FRAC recommends the final rule require State agencies establishing additional limiting criteria to seek approval from the regional office by submitting a request with the criteria justification demonstrating the need, value, and expected impacts on client choice and satisfaction, and plans for evaluating the impact of the criteria. The approved additional criteria should be integrated into the State WIC agencies management evaluation by the regional office.

§ 246.10(b)(1)(i)

*“(b) State agency responsibilities.*

*(1) State agencies may: (i) Establish criteria in addition to the minimum Federal requirements in table 4 to paragraph (e)(12) of this section for the supplemental foods in their States, except*

*that the State agency may not selectively choose which eligible fruits and vegetables are available to participants. These State agency criteria could address, but not be limited to, other nutritional standards, competitive cost, State-wide availability, and participant appeal. For eligible fruits and vegetables, State agencies may restrict packaging, e.g., plastic containers, and package sizes such as single serving, of processed fruits and vegetables available for purchase with the cash-value voucher. In addition, State agencies may identify certain processed WIC-eligible fruits and vegetables on food lists where the potential exists for vendor or participant confusion in determining authorized WIC-eligible items.”* **State agencies establishing additional limiting criteria must seek approval from the regional office by submitting a request with the criteria justification demonstrating the need, value, and expected impacts on client choice and satisfaction, and plans for evaluating the impact of the criteria. The approved additional criteria will be integrated into the State WIC agencies management evaluation by the regional office.**

**Recommendation:** FRAC recommends the final rule require State WIC agencies to authorize at least **two** package sizes (or combination of package sizes) that equal or add up to the maximum monthly allowances for the following authorized supplemental foods in each of the food packages: breakfast cereal, juice, yogurt, whole grain bread and grains. This will help ensure clients secure the full amount. Please see below for the recommended edits in red to the proposed regulations.

§ 246.10(b)(2)(i)

*“(2) State agencies must: (i) Identify the brands of foods and package sizes that are acceptable for use in the Program in their States in accordance with the requirements of this section; **all State agencies must authorize at least two package sizes (or combination of package sizes) that equal or add up to the maximum monthly allowances of the following authorized supplemental foods in each of the food packages: breakfast cereal, juice, yogurt, whole grain bread and grains; and at least one package size (or combination of package sizes) that equal or add up to the maximum monthly allowances of all other authorized foods in each of the food packages. State agencies must also provide to local agencies, and include in the State Plan, a list of acceptable foods and their maximum monthly allowances as specified in tables 1 through 4 to paragraphs (e)(9) through (12) of this section;**”*

**Recommendation:** In view of the proposed changes to § 246.10 Supplemental foods, FRAC recommends the final rule be amended to require WIC vendors stock at least **one** package size (or combination of package sizes) that equal or add up to the maximum monthly allowances. Please see below for the recommended edits in red to the proposed regulations. This stocking requirement can help ensure clients can redeem the maximum monthly benefit amounts.

*“§ 246.12 Food delivery methods. \* \* \* \* (g) \* \* \* (3) \* \* \* (i) Minimum variety and quantity of supplemental foods. The State agency must establish minimum requirements for the variety and quantity of supplemental foods that a vendor applicant must stock to be authorized. These*



*requirements include that the vendor stock at least two different fruits, three different vegetables, at least one package size (or combination of package sizes) that equal or add up to the maximum monthly allowances for all authorized supplemental foods in each of the food packages, and at least one whole grain cereal authorized by the State agency. The State agency may not authorize a vendor applicant unless it determines that the vendor applicant meets these minimums. The State agency may establish different minimums for different vendor peer groups. The State agency may not authorize a vendor applicant unless it determines that the vendor applicant obtains infant formula only from sources included on the State agency's list described in paragraph (g)(11) of this section."*

## **Proposed Rule Section V. Implementation**

**To safeguard the value of these new food package improvements and help ensure availability and equitable access to all of the food choices in stores, FRAC recommends the implementation plan:**

- require state and local agency vendor training, resources, support, oversight, and appropriate stocking rules;
- provide WIC participants with adequate training and easy-to-use options to determine if a food is WIC-eligible, to report and resolve problems, to check food-benefit levels and expiration dates, and to receive food benefits expiration reminders;
- support the production of comprehensive culturally appropriate education and promotion campaign to ensure participants can maximize the new food package options;
- create a central data base of foods meeting the WIC nutrition standards;
- provide ample support to increase the availability of authorized WIC stores in underserved areas, utilizing Farmer's Markets, and encourage WIC online ordering; and
- leverage the excellent work of the USDA, FNS, Office of Innovation, Supplemental Nutrition & Safety Programs initiatives to improve, modernize, and simplify the WIC shopping experience to support implementation.

A successful WIC shopping experience is central to WIC participant satisfaction, continued participation, and achieving the efficacy of the revised new WIC food packages. Recommendations focus on WIC participants' needs, increasing the number of WIC authorized stores in underserved communities, and allowing innovation to inform WIC's future. Implementation will be crucially important because barriers to redeeming the WIC food package can diminish the value and impact of the program.<sup>20,21</sup> The process of shopping for WIC-approved foods varies significantly from state to state. Barriers to full redemption of benefits include: challenges identifying allowable WIC-eligible foods and determining the correct amount of fruits and vegetables for the WIC cash value voucher; a limited selection of WIC foods available in some stores, or the products not available in the allowable forms; and



embarrassing check-out experiences, including negative interactions with cashiers.<sup>22,23,24,25</sup> The WIC shopping and check-out experience has been identified as central to participants' satisfaction or dissatisfaction, and continued participation, or opting out of the program.<sup>26,27</sup>

The proposed trade-offs of reducing the amount of some foods (e.g. milk) as a cost savings measure to pay for the addition of other foods (e.g., canned fish) will not be a welcomed change for some WIC participants. In particular, the children's package, which is losing milk and bread/grains and gaining canned salmon, sardines and/or mackerel, could be a challenge. WIC only serves an estimated 50.2 percent of those eligible for the program with coverage rates for children (aged 1 through 4) consistently lowest.<sup>28</sup> Parents have expressed dissatisfaction with the WIC children's food package for many reasons, including the limited range of authorized food options, brands, and child-friendly choices on some state food lists, and because the children's package is worth considerably less than the infant package.<sup>29</sup> Giving parents the opportunity to maximize the new choices and flexibilities, and fully redeem the fruits and vegetables, will be important. The perceived value of the children's food package will be central to the success of efforts to increase participation.

**FRAC recommends USDA encourage State WIC agencies to establish State WIC Food Package Advisory Councils to bring a diversity of voices and support for an equitable implementation process.** State WIC Food Package advisory councils should be established to help support and inform the planning and early implementation of the revised WIC food package. To be most effective, the advisory councils should include WIC participants and representatives of the communities and organizations working to improve the health and well-being of the families served by WIC, such as advocates, food bankers, immigrant groups, food policy councils, local WIC agencies, grocery stores, vendors, and farmers.

As part of guidance implementing the proposed rule to permanently increase the fruit and vegetable benefits, encourage the inclusion of Farmers' Markets as WIC vendors for the CVV implementation. USDA can offer best practices for including Farmers' Markets as WIC vendors, and creating cooperation and coordination between the WIC State agencies, Indian Tribal Organizations, and Farmers' Markets, as well as, farmers and ranchers, local and regional food hubs, food sovereignty initiatives, and Tribal governments. Farmers Market programs have the proven track record in helping WIC participants shop successfully for fruits and vegetables.

### **Implementation Timeline and Rules**

The proposed 18 months for implementation is warranted given the complexity of the proposed changes. Based on FRAC's monitoring of the last WIC food package revisions, most of the State WIC agencies needed the full time allowed to fully prepare and, as a result, implemented the new WIC food package at the end of the implementation period. For this reason, **FRAC recommends adding language to the final rule clarifying USDA's intent to allow the State WIC agencies to continue to offer the current WIC CVV levels (adjusted for inflation) until the new food packages are implemented.**

In addition, given the importance of ensuring the necessary technology including EBT systems, WIC food Apps, portals and assistance are functioning effectively, USDA should consider allowing states to pilot or roll out the new food packages by county/local agencies. State agencies and USDA have worked effectively to create this type of implementation for EBT. Applying this type of phased in implementation could help to protect WIC participants from unforeseen problems and ensure the integrity of the systems functions as intended.

## Evaluation

**FRAC commends USDA for plans to evaluate the impact of the implementation of the new revised WIC food packages. This will give the Department the opportunities to make adjustments as necessary.** USDA's plan to conduct studies on the impact of the implemented revised WIC Food Packages will be helpful. Similar to the evaluation of the last revision, the following questions could be considered:

- How are WIC participation rates, prescription rates, and redemption rates affected by the changes in the food packages?
- To what extent do the assumptions regarding the demand for various forms and types of food align with actual food choices?
- How does this affect the amount of flexibility, variety, and participant choices that can be allowed while staying within necessary cost constraints?
- What are the impacts of the changes on food choices and nutrient adequacy of diets?
- Do diets conform more closely to the *Dietary Guidelines* and does the prevalence of inadequate intakes and excessive intakes decline?
- What is the feedback from WIC participants regarding the desirability of the newly revised food packages with all the changes? Did this increase the actual and perceived value of the food packages to eligible populations?

Thank you for this opportunity to share FRAC's comments on the proposed revisions to the WIC food packages. FRAC urges USDA to move quickly to a final rule. The proposed client-centered WIC food packages will enhance the positive impact of WIC in supporting good health and healthy communities. The proposed will increase access to fruits, vegetables, whole grains, and a full range of healthy foods; it will lower sugar; and is consistent with 2020–2025 Dietary Guidelines for Americans.

Sincerely,

Geraldine Henchy, MPH, RD  
Director Nutrition Policy and Early Childhood Programs

Katherine Jacobs, MPH, RD  
Program Manager, Early Childhood Programs and Food Systems

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- <sup>1</sup> Special Supplemental Nutrition Program for Women, Infants and Children (WIC): Revisions in the WIC Food Packages (87 FR 71090). Available at: <https://www.federalregister.gov/documents/2022/11/21/2022-24705/special-supplemental-nutrition-program-for-women-infants-and-children-wic-revisions-in-the-wic-food>
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- <sup>3</sup> National Academies of Sciences, Engineering, and Medicine. (2017). “Review of WIC Food Packages: Improving Balance and Choice: Final Report,” Available at: <https://www.fns.usda.gov/wic/review-wic-food-packages-improving-balanceand-choice>.
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- <sup>8</sup> Jacobs, K. (2022). WIC During COVID-19: Participation and Benefit Redemption Since the Onset of the Pandemic. Available at <https://frac.org/wp-content/uploads/wic-during-covid-19-2022.pdf>
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