

Appendix D.1. Public Comment #1

Submitter Information

Name: Anonymous Anonymous

General Comment

Notice Title:

Agency Information Collection Activities: WIC Tribal Organizations and U.S. Territories Study

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Agency: U.S. Department of Agriculture – Food and Nutrition Service

Date Submitted: August 5, 2025

Comment Deadline: August 12, 2025

Comment:

To Whom It May Concern,

I write in response to the request for comments on the proposed information collection for the WIC Tribal Organizations and U.S. Territories Study. This study is timely and essential for advancing equity in nutrition access, especially among historically underserved populations. However, I respectfully urge the agency to consider integrating climate-related dimensions—particularly those involving carbon dioxide (CO₂) emissions and climate vulnerability—into its data collection and policy interpretation.

Why CO₂ and Climate Considerations Matter in This Context:

Supply Chain Fragility and Emissions:

WIC programs serving tribal communities and U.S. territories often depend on long and carbon-intensive supply chains, especially when reliant on imported goods or limited transportation infrastructure. Understanding the carbon footprint and climate resilience of food delivery systems is relevant to both cost efficiency and sustainability.

Disaster Resilience and Food Security:

Many tribal areas and island territories are at the front lines of climate-related disasters (e.g., hurricanes, droughts, and flooding), which disrupt WIC access.

Including qualitative questions about climate vulnerability or program disruption due to extreme weather events could inform future program adaptations and emergency

readiness.

Environmental Justice Alignment:

While the Executive Orders 13990 and 14008 have been revoked, the principles of environmental justice and equitable resilience remain important. Tribal organizations and territories often face disproportionate climate risks, and data that captures both nutritional need and environmental stress is vital for forward-looking policy design.

Green Program Delivery Models:

Exploring opportunities for low-emission food procurement, renewable energy use in distribution, or digital engagement strategies may yield benefits for both environmental and human health outcomes. Early data collection is the first step toward evaluating such innovations.

Recommendation:

I recommend that the Food and Nutrition Service consider including optional or indirect indicators related to climate resilience, environmental sustainability, and carbon emissions in this information collection. Even minimal additions—such as questions on climate-related service disruptions or energy sources in food storage—could yield actionable insights.

Thank you for advancing this important work, and for considering how WIC services can contribute not only to health equity but also to climate-conscious governance.

Sincerely,

A Concerned Citizen

Submitted Anonymously

Date: August 5, 2025