Approaches to Reducing Sodium Consumption

The Food and Drug Administration (FDA) and the Department of Agriculture’s Food Safety and Inspection Service (FSIS) are currently soliciting public comment on approaches to reducing sodium consumption. Comments will be accepted until November 29, 2011.

Why are the Agencies Requesting Comment?
The FDA and FSIS are considering potential ways to promote gradual, achievable, and sustainable reduction of sodium intake over time. To help them in their efforts, the Agencies are interested in learning more about current and emerging practices by the private sector in sodium reduction; current consumer understanding of the role of sodium in hypertension and other chronic illnesses; sodium consumption practices; motivations and barriers in reducing sodium intake; and issues associated with the development of targets for sodium reduction in foods.

What Type of Comment is Most Helpful?
Any type of comment is accepted; however the Agencies are particularly interested in comments that include research or data related to sodium reduction. We also encourage the submission of comments that highlight sodium reduction initiatives taken by individual states.

Please see page two of this document for a list of specific topic areas the Agencies have requested comment on.

How Do I Submit Comments?
Comments may be submitted either by mail or via the Internet.

To submit comments by mail, send one copy of your letter to each of the following addresses:

Division of Dockets Management
Docket Clerk
HFA-305
U.S. Department of Agriculture
Food & Drug Administration
Food Safety & Inspection Service
5630 Fishers Lane
FSIS Docket Room
Room 1061
1400 Independence Avenue, SW
Rockville, MD 20852
Patriots Plaza 3, Mailstop 3782, Room 163A
Washington, DC 20250

Letters to the FDA must reference the following identification number: FDA-2011-N-0400.
Letters to the FSIS must reference identification number: FSIS-2011-0014.

Comments can be submitted electronically on the regulations.gov website. To ensure that both FDA and FSIS consider your comments, they must be submitted separately to each agency. The web address for each agency follows. Please copy and paste the web address into your browser:

For the FDA: http://www.regulations.gov/#!submitComment;D=FDA-2011-N-0400-0001
For the FSIS: http://www.regulations.gov/#!submitComment;D=FSIS-2011-0014-0001

Enter the required contact information. You may then either type your comment into the provided text box or attach your letter using the “file upload” feature. Please note that you must click the “submit” button to submit your comment.

Comments must be submitted by November 29, 2011.
Comment Topic Areas

1. Comments and research related to recent sodium reduction initiatives by industry and the effects of those initiatives.
2. Comments and research related to consumer understanding of the role of sodium in hypertension and other chronic illnesses, sodium consumption practices, and motivation and barriers in reducing sodium in their food intakes.
3. Comments and research related to effective strategies for sustainable and meaningful reduction of sodium in foods sold in packaged or prepared form across the food supply, including and in particular foods with a high sales volume.
4. Comments and research related to existing or potential positive incentives for innovation in reformulating packaged and restaurant foods to reduce added sodium.
5. Comments and research related to the recommendations from the April 2010 IOM Sodium report on "Strategies to Reduce Sodium Intake in the United States," including research related to information gaps identified in the IOM report (taste preferences for sodium, technological role of sodium/salt, role of food matrix, food safety, etc).
6. Comments and research related to the following: (a) Methods for establishing sodium reduction targets, including information on general target design (e.g., setting sodium reduction targets based on food categories, serving size, or formulations), (b) step-wise approaches to achieve sustainable sodium reductions and timeframes for achieving such reductions, and (c) methods for evaluating the impact of a sodium reduction strategy.
7. Comments and research related to avoiding potential unintended consequences for food safety, nutrition (including effects on added sugars or solid fats), or food manufacturing technologies that could result from interventions to reduce sodium.
8. Comments and research related to existing voluntary sodium reduction efforts, including the voluntary sodium reduction targets set by the New York City-initiated NSRI partnership, and their applicability to a potential federal sodium reduction initiative.
9. Comments and research related to food formulation, processing, production, and other technology that could lead to meaningful and sustainable reductions in the amount of sodium in food, including specific food categories, targets, and methods to monitor.
10. Comments and research on the role that food standards of identity play in promoting or limiting the feasibility of sodium reduction of foods (among other things, standards of identity for certain foods define the nature of those foods, generally in terms of how those foods are prepared, the types of ingredients that they must contain (i.e., mandatory ingredients) and that they may contain (i.e., optional ingredients), and how those foods must be labeled (Federal Food, Drug, and Cosmetic Act (21 U.S.C. 341); the Federal Meat Inspection Act (21 U.S.C. 607(c)); and the Poultry Products Inspection Act (21 U.S.C. 457(b)).
11. Comments and research on any advantages of sodium to consumers, including but not limited to, food safety, nutrition, and palatability.
12. Comments and research on the economic impacts of reducing sodium, including but not limited to, the cost of food, agricultural production, small businesses, jobs, and the health care system.
13. Comments and research on the impact of sodium reduction initiatives on consumer food choices and compliance with 2010 Dietary Guidelines for Americans recommendations.
14. Comments and research related to how consumers respond to sodium reductions (i.e., adding back salt to foods, consumption of reformulated products).
15. Comments and research related to effective methods for communicating to the public the health benefits associated with the sodium intake levels recommended by the 2010 Dietary Guidelines for Americans.
Sample Format for a Comment Letter

Comment letters should be placed on the organization’s letterhead whenever possible.

October ____, 2011

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HFA-305
Food & Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Docket Clerk
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Food Safety & Inspection Service
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1400 Independence Avenue, SW
Patriots Plaza 3, Mailstop 3782
Room 163A
Washington, DC 20250

RE: FDA-2011-N-0400 and FSIS-2011-0014

Dear Sir or Madam:

Thank you for the opportunity to provide comments on approaches to reducing sodium consumption. We are pleased that the Food and Drug Administration and the Food Safety and Inspection Service are focusing on the need to reduce the amount of sodium Americans consume.

[Address the topic areas the FDA and FSIS have requested comment on. Whenever possible, include research, data, or information about salt reduction initiatives in your state.

When moving from one topic area to another, we recommend breaking up the text by including subheadings such as “Establishing sodium reduction targets” or “Existing voluntary sodium reduction efforts” at the beginning of each new section.]

In conclusion, we reiterate our support of your efforts to reduce sodium consumption. As discussed above, we believe meaningful reductions can be achieved by....

If you have any questions or need any additional information, please contact [name], [title] at [phone number] or [email address].

Sincerely,

Signature

[Name]
[Title]

American Heart Association
General Areas AHA May Address in its Comments

Please note that the following bullet points represent general topic areas AHA may address in its comments to FDA and FSIS. As AHA develops its comments, these areas may change. More detailed information about AHA’s comments will be available at a later date. To obtain future updates, visit www.heart.org/sodium and sign up for AHA’s Sodium Reduction Updates.

- The need to reduce sodium consumption
- The effect of sodium on health, particularly on blood pressure and the risk for cardiovascular disease
- AHA’s commitment to reducing sodium consumption:
  - Involvement in the National Sodium Reduction Initiative
  - Collaborative effort to implement the IOM report recommendations
  - AHA 2020 Health Impact Goal – all Americans should consume less than 1,500mg a day
  - Changes to the AHA Heart Check Mark Program
- Support for a step-wise reduction:
  - Goal should be less than 1,500mg by 2020
- IOM sodium report “Strategies to Reduce Sodium Intake in the U.S.”:
  - Support the report’s recommendations
  - Importance of the report’s recommendation on GRAS
  - Original research on legal opportunities related to GRAS
- Current sodium reduction efforts:
  - What the food industry is doing internationally
  - What we’ve learned from Heart Check Mark companies about reformulation
- Establishment of sodium limits in foods:
  - Lessons from New York City and the National Sodium Reduction Initiative
  - Need for a nationwide standard
- Consumer control over sodium content:
  - Original research on consumer desire to control the amount of sodium in their foods
- Economic impact of reducing sodium:
  - Will produce cost savings for the health care system
- Need to reduce sodium across the board:
  - Reiterate support for robust sodium standards in the School Meals and Competitive Food standards, in procurement standards, and in proposed principles for foods marketed and advertised to children
  - Need to conduct a consumer education campaign and emphasize healthy eating patterns