FDA and FSIS Request Comment on Effective Approaches for Reducing Sodium Consumption in the Diet


Excess sodium consumption is known to be a contributing factor to hypertension, which in turn contributes to two major leading causes of death in the United States - heart disease and stroke (see Institute of Medicine (IOM), “Dietary Reference Intakes for Water, Potassium, Sodium Chloride and Sulfate”). The Center for Disease Control and Prevention (CDC) estimates that over 80 percent of the adult U.S. population consumes more than the recommended 2,300 milligram per day (mg/day) limit. According to IOM, over three-quarters of sodium intake is attributable to salt added during the manufacturing of food and preparation of restaurant food (id.).

Recognizing the challenges facing industry and consumers alike, and in light of the fact that past efforts to reduce consumer sodium intake through regulation of food labeling to include sodium-related nutrient content and consumer education initiatives have been only moderately effective in reducing average sodium intake to the recommended level, FDA and FSIS are requesting additional comment in order to more effectively assist Americans in meeting the recommended dietary intake levels for sodium. Estimates demonstrate that the target reduction in sodium levels could result in substantial health benefits and financial savings. For example, reducing the average adult sodium intake to the recommended 2,300 mg/day (1,500 mg for “persons who are 51 or older and those of any age who are African American, or have hypertension, diabetes, or chronic kidney disease”)¹ could eliminate an estimated 11 million hypertension cases² at a

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savings of $18 billion, with further intake reductions possibly realizing healthcare cost savings of 
$10 to $24 billion annually.³

FDA and FSIS recognize that sodium serves many roles in achieving food safety and quality (for 
example, reducing the growth of pathogens, improving texture and meltability, providing flavor, 
and controlling stickiness). In light of these practical applications, FDA and FSIS have asked for 
public comment and information regarding industry best practices addressing more than 15 
different sodium-related issues, including:

- Methods for establishing achievable and sustainable sodium reduction targets and 
timeframes, and methods for evaluating the impact of such reductions;
- Effective industry strategies (including methods of food formulation, processing, and 
production) for the reduction of sodium in packaged or prepared foods and potential 
incentives for the reformulation of both packaged and restaurant foods to reduce overall 
sodium content;
- Consumer perceptions of the role of sodium in chronic diseases, including hypertension;
obstacles to or successes in achieving a reduction in sodium intake through food intake;
impact on food choices from the 2010 Dietary Guidelines recommendations and other 
sodium reduction initiatives; and perceived consumer response to sodium reductions;
- Effective methods for broadly communicating the health benefits associated with sodium 
intake levels;
- Methods to avoid negative economic impacts and unintended consequences regarding 
food safety and nutrition which may result from sodium content reductions;
- The impact that sodium reduction in foods may have on established standards of identity 
(i.e., preparation methods and mandatory and optional ingredients) and 
associated labeling requirements;
- Recommendations and comments in light of the 2010 IOM sodium report entitled, 
“Strategies to Reduce Sodium Intake in the United States;” and
- Existing voluntary sodium reduction programs and their potential for use as a model for a 
federal sodium reduction initiative.

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Interested parties are invited to submit comments to FDA or FSIS by November 29, 2011, via 
http://www.regulations.gov [FDA Docket No. FDA-2011-N-0400 and FSIS Docket No. FSIS-
2011-0014]. Submissions containing trade secret or confidential business information (CBI) 
may be marked as confidential. For more information, contact Danny Rubenstein at 
rubenstein@khlaw.com, Laura Foley at foleyl@khlaw.com, or Mel Drozen at 
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³     Palar K, Sturm R. “Potential societal savings from reduced sodium consumption in the U.S. adult 