



Katharine Haxall, MPH
Cardiovascular Disease Prevention and Control Program
NYC Department of Health and Mental Hygiene
2 Lafayette St. 14th Floor
New York, NY 10007

February 1, 2010

Dear Ms. Haxall:

The American Butter Institute (ABI) wishes to respond to the final proposed targets for dairy products as part of the New York City Department of Health and Mental Hygiene national sodium reduction initiative and posted on the program's web site. The American Butter Institute is an Arlington, VA-based trade association for manufacturers, processors, marketers and distributors of butter and butter products. Originally established as the National Association of Creamery Manufacturers in 1908, ABI's mission is to promote and protect the interests and welfare of the industry. There are currently 29 active member companies who market approximately 95% of all the butter manufactured in the U.S. We appreciate your shared priority of ensuring the safety profile of any modified products.

Unsalted butter is currently available in the marketplace. Generally for manufacturing unsalted butter, lactic acid has been used to replace the bacteriostatic properties of salt. Consumers sometimes note an acidic flavor with unsalted butter negatively impacting consumer acceptance. Consequently unsalted butter has only achieved about 1/5th market share for the entire butter category.

Salt is not added to butter for volume/filler purposes, but to achieve the desired safety and organoleptic properties. Salt plays a critical role in the butter manufacturing process by controlling the activities of microorganisms and enzymes. Salt levels affect butter flavor, texture, and shelf life. Salt is also a significant factor in minimizing the growth of pathogenic organisms in butter. While unsalted butter does represent a reduced-sodium alternative for some consumers, substitution of some lactic acid for some salt cannot result in equivalent functionality for its bacteriostatic and organoleptic properties.


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Jerome J. Kozak
Executive Director

Anuja Miner
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We believe that prior to further action, the NYC Department of Health and Mental Hygiene should hold a face-to-face meeting of food science and industry representatives to discuss food safety challenges and the state of product development in the butter category posed by the most recent proposed targets. We would be happy to recommend individuals with expertise in each of these areas to assist in such a deliberation.

Sincerely,

A handwritten signature in purple ink that reads "Jamie S. Jonker". The signature is written in a cursive style with a large, stylized initial "J".

Jamie S. Jonker, Ph.D.
Vice President, Scientific & Regulatory Affairs