



National Milk Producers Federation

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Agri-Mark, Inc.
Associated Milk Producers Inc.
Bongards' Creameries
Cooperative Milk Producers Association
Cortland Bulk Milk Producers Cooperative
Dairy Farmers of America, Inc.
Dairymen's Marketing Cooperative, Inc.
Ellsworth Cooperative Creamery
Farmers Cooperative Creamery
FarmFirst Dairy Cooperative
First District Assoc.
Foremost Farms USA
Land O'Lakes, Inc.
Lone Star Milk Producers
Maryland & Virginia Milk Producers Cooperative Association
Michigan Milk Producers Association
Mid-West Dairymen's Company
Mount Joy Farmers Cooperative Association
Northwest Dairy Assoc.
Oneida-Madison Milk Producers Cooperative Association
Prairie Farms Dairy, Inc.
Premier Milk Inc.
Scioto County Cooperative Milk Producers' Association
Select Milk Producers, Inc.
Southeast Milk, Inc.
St. Albans Cooperative Creamery, Inc.
Swiss Valley Farms
Tillamook County Creamery Association
United Dairymen of Arizona
Upstate Niagara Cooperative, Inc.
Zia Milk Producers, Inc.

October 17, 2016

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

(Submitted electronically: www.regulations.gov)

Re: Docket No. FDA-2014-D-0055. Voluntary Sodium Reduction Goals: Target Mean and Recommended Maximum Concentrations for Sodium in Commercially Processed, Packaged and Prepared Foods. 81 Fed. Reg. 35363 (June 2, 3536-35367)

Dear Sir or Madam:

The National Milk Producers Federation (NMPF) appreciates the opportunity to comment on the Food and Drug Administration's (FDA) voluntary sodium reduction targets. In reviewing the proposed food categories, we noted two categories that were omitted and should be included in the document along with sodium reduction goals -- imitation dairy beverages (e.g., soy beverages) and imitation dairy foods (e.g., imitation cheese products).

Because the category of plant-based imitation dairy products is marketed using the names of standardized dairy products (i.e., "milk"), it has misled and confused consumers as to the true nutritional content of these products. A quick survey of commercially available imitation dairy products demonstrated levels of sodium in imitation dairy beverages that are significantly greater than those found in milk (often as much as 60 mg more per serving), as well as in other plant-based imitators (up to twice the sodium in imitation cheeses and in imitation yogurts) compared to their true dairy counterparts.

Unlike with milk, where sodium is naturally-occurring, sodium is added to imitation dairy beverages and imitation dairy foods for taste, and in amounts greater than what is needed for microbial safety and product stability. Further, the wide range of sodium levels within the categories and among the brands of imitation dairy beverages and imitation dairy products indicates that modest sodium reduction would be readily achievable using existing food science principles.

Given FDA's goal of promoting sodium reduction in the food supply, these two categories are ideal candidates for including in the guidance.

We thank the agency for consideration of our comments. Please contact us for additional information.

Respectfully Submitted,

A handwritten signature in black ink that reads "Beth Panko Briczinski". The signature is written in a cursive style with a large, looped initial "B".

Beth Briczinski, Ph.D.
Vice President, Dairy Foods & Nutrition

The National Milk Producers Federation, based in Arlington, VA, develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. The members of NMPF's cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of more than 32,000 dairy producers on Capitol Hill and with government agencies. Visit www.nmpf.org for more information.