



December 2, 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) and International Dairy Foods Association (IDFA) appreciate the opportunity to provide feedback on the Food and Drug Administration's (FDA) voluntary sodium reduction targets.

In October, NMPF and IDFA filed a very detailed set of technical comments related to sodium reduction efforts in dairy products and our evaluation of FDA's categories, baselines, and short-term targets. Rather than repeat our October comments, we instead incorporate them by reference (as submitted on 10/17/2016), as well as comments submitted by the American Butter Institute (as submitted on 10/17/2016), the American Cheese Society (as submitted 10/31/2016) and the National Dairy Council (as submitted on 12/2/2016).

As these comments all described, salt plays many roles in the manufacture of dairy products, impacting both product safety and product quality. Numerous challenges and hurdles were identified with respect to trying to reduce sodium (e.g., lack of technology, current regulations, and resource limitations). NMPF and IDFA have significant concerns about the appropriateness, accuracy and impact of the voluntary sodium reduction targets for dairy products as proposed, and those concerns have not diminished with respect to the long-term targets. Not only might they have adverse impacts on quality – and in some cases, the safety of the product may be seriously adversely affected – but they could also

reduce consumer demand for our products. FDA should not put pressure on industry to take actions that will jeopardize the safety of the U.S. food supply and accordingly, the health of the public.

NMPF and IDFA again emphasize the need to remove the entire cheese category, as well as butter, from the sodium reduction guidance. Though our efforts to find safe and effective means of reducing sodium in our products have been extensive and will continue, the dairy industry faces significant barriers to sodium reduction (as outlined in our October comments). Accordingly, in good faith, we cannot agree to the proposed targets for dairy products when we cannot be assured of technology to achieve those targets within the given timeframes without compromising on product safety and quality.

NMPF and IDFA would also like to provide some additional information on a point noted in the National Dairy Council’s (NDC’s) comments about the discrepancies that exist in the sodium reduction goals for individual foods and mixed dishes. Our organizations support comments submitted by NDC that the 2-year and 10-year sodium reduction goals for mixed dishes that include cheese are not reflective of the goals for the individual ingredients, specifically the amount of sodium contributed from the cheese ingredient in the mixed dish.

For example, Food Category ID 126 ‘Hamburgers/Ground Meat Sandwiches: Without Cheese’ has a long-term sales weighted target mean of 220 mg/100g, while Food Category ID 127 ‘Hamburgers/Ground Meat Sandwiches: With Cheese’ has a corresponding target mean of 300mg/100g. The difference between these two target means is 80mg/100g. Presumably, the only significant difference between these two categories is the addition of cheese.

As illustrated in the table below, using nutrition information from McDonald’s, the contribution of one slice of cheese added to a regular hamburger is calculated to be an additional 200 mg of sodium¹, which is equivalent to 1411 mg sodium per 100 g of cheese. The table provides a clear picture that FDA’s proposed sodium targets for the cheese used for a cheeseburger is dramatically lower than the proposed targets for the cheese alone and from cheese used at quick service restaurants. NMPF and IDFA strongly believe these sodium reduction targets are not achievable for the cheese portion of the Food Category ID 127 “Hamburgers/Ground Meat Sandwiches: With Cheese” and urge the Agency to reconsider these targets.

Description	Sodium per 100 g of cheese		
		Category 3 Processed Cheese/Cheese Food	Difference between Category 126 and 127
Cheese on McDonald’s Cheeseburger	1411 mg		
2010 Baseline sales-weighted mean		1358 mg	1190 mg
Short-term (2-year) target mean		1210 mg	980 mg
Long-term (10-year) target mean		1000 mg	560 mg

We look forward to the opportunity for dialogue with you on this issue so that we might discuss our concerns in detail. We would also greatly appreciate an opportunity to review and to provide comment on any revisions to the proposed guidance.

¹Accessed at: <https://www.mcdonalds.com/us/en-us/about-our-food/nutrition-calculator.html>

Respectfully Submitted by,



Beth Briczinski, Ph.D.
Vice President, Dairy Foods & Nutrition
National Milk Producers Federation



Cary Frye
Vice President, Regulatory & Scientific Affairs
International Dairy Foods Association

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.

International Dairy Foods Association (IDFA) represents the nation's dairy manufacturing and marketing industries and their suppliers, with a membership of 550 companies within a \$125-billion a year industry. IDFA is composed of three constituent organizations: the Milk Industry Foundation, the National Cheese Institute, and the International Ice Cream Association. IDFA's 200 dairy processing members run nearly 600 plant operations, and range from large multi-national organizations to single-plant companies. Together they represent more than 85 percent of the milk, cultured products, cheese, ice cream, and frozen desserts produced and marketed in the United States.