



Revised Statement
of the
National Restaurant Association

ON: APPROACHES TO REDUCING SODIUM CONSUMPTION

DOCKET No. FDA-2011-N-0400

DOCKET No. FSIS-2011-0014

TO: FOOD & DRUG ADMINISTRATION, DEPARTMENT OF HEALTH & HUMAN SERVICES;

FOOD SAFETY & INSPECTION SERVICE, DEPARTMENT OF AGRICULTURE

BY: JOAN MCGLOCKTON, VICE PRESIDENT – FOOD POLICY

DATE: NOVEMBER 10, 2011

**Revised Statement on
Approaches to Reducing Sodium Consumption**

**Before the
Food & Drug Administration, Department of Health & Human Services;
Food Safety & Inspection Service, Department of Agriculture**

By

**Joan McGlockton
Vice President – Food Policy
National Restaurant Association**

November 10, 2011

The National Restaurant Association, the leading business association for the restaurant industry, appreciates the opportunity to provide information on sodium reduction and recognizes that sodium reduction is important to the health of a subset of Americans. As acknowledged by FDA, and highlighted in this statement, our industry has made significant strides in reducing sodium and will continue to do so while supporting consumer education, access to information, and other efforts vital to assisting consumers in lowering their sodium intake

An effective approach to reducing sodium must be voluntary, incremental, flexible, and take into account the eating preferences of consumers, the formidable technological challenges, and the multiple uses of sodium in the food supply. We oppose regulatory mandates or targets that prescribe a specific level of sodium per food item as unrealistic and unnecessary. Moderating sodium intake is tied to examining whole dietary patterns as the best approach to health and wellness. A flexible approach will work when consumers have varied menu choices and access to nutrition information to allow consumers to make informed decisions. That is why the Association was a chief proponent of the new mandatory menu labeling law. FDA and USDA should evaluate the impact of the new law before it contemplates, what, if any, government action is needed in regard to sodium reduction.

Within these brief comments we would like to address three key points

First, taste is the most important factor to our dining customers and thus is critical to the success of our industry. 40% of consumers believe taste suffers when sodium is reduced and experience has shown that consumers are less likely to order low sodium menu items due to this perception. Currently there are few sodium alternatives that don't disappoint on taste and when sodium levels disappoint on taste consumers will typically add salt or simply avoid sub-par tasting products. Government driven sodium reductions that are not obtainable will not contribute to advancing public health, nor will unrealistic

standards change consumers' fundamental interest in foods that are palatable. FDA and USDA must proceed with caution in ensuring that any recommendations are feasible.

Second, the supply chain plays an integral part in providing menu items to restaurants and thus directly impacts our progress. Even as our industry continues to invest in sodium reduction and to demand from our suppliers lower sodium options, the challenges remain significant. Imposing voluntary or mandatory sodium reductions will prove futile absent evidence that ensures that any measures from FDA and USDA are obtainable across all categories of foods.

Finally, it is important to note the complex and integral role of sodium in food safety and quality.

Sodium inhibits the growth of microbial pathogens and spoilage organisms. The quality of bakery and many other foods is tied to the use of sodium-containing ingredients.

In conclusion, we appreciate the thoughtful approach of FDA and USDA in seeking input on key questions. Our industry continues to make progress in reducing the sodium content of its foods and expanding menu options. Some members have publically pledged to reduce sodium while many others are equally committed and continue to focus resources toward sodium reduction that consumers will accept. With the enactment of menu labeling, consumers will have the necessary information to make informed decision regarding their menu selections. The Association's recently launched Kids LiveWell program , with nearly 20,000 participating restaurant locations, and growing, provides healthful menu options for children based on nutrition criteria that includes a limit on sodium. As you can see, the industry has stepped up and will continue to play a key role in ensuring Americans have access to healthier options, including lower sodium options while dining out.

Thank-you.