



AMERICAN PUBLIC HEALTH ASSOCIATION
For science. For action. For health.

December 2, 2016

Robert M. Califf, MD
Commissioner
Food and Drug Administration
Division of Dockets Management (HFA-305)
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Re: Docket No. FDA-2014-D-0055; Voluntary Sodium Reduction Goals: Target Mean and Upper Bound Concentrations for Sodium in Commercially Processed, Packaged and Prepared Foods; Draft Guidance for Industry

Dear Commissioner Califf:

The American Public Health Association, a diverse community of public health professionals who champion the health of all people and communities, strongly endorses the Food and Drug Administration's proposed voluntary guidance for sodium reduction in the food supply and its 10-year targets and upper bounds, and urges FDA to set an even shorter timetable. Establishing the 10-year targets in 2017 would mean a span of 17 years between FDA's baseline data and its goal for sodium reduction. The food industry should be encouraged to move as fast as possible given the potential number of premature deaths and magnitude of disease that would be prevented by reducing excessive sodium in our foods. Researchers estimate that reducing current sodium intakes by 1,200 mg a day (which would bring most people close to the 2,300 mg per day goal of FDA's long-term targets) would prevent 60,000 to 120,000 cases of coronary heart disease and 32,000 to 60,000 stroke cases.ⁱ As many as 44,000 to 92,000 deaths from heart attacks and strokes could be prevented each year and \$10 billion to \$24 billion in health care costs could be saved annually by reducing sodium intake to 2,300 mg per day.ⁱⁱ

The imperative for quicker action is evident from the recently published technical document by the World Health Organization on sodium reduction: "The WHO Member States in [World Health Assembly] 66.10 have agreed on a voluntary global [non-communicable disease] target for a 30% relative reduction in mean population intake of salt, with the aim of achieving a target of less than 5 grams per day (approximately 2g sodium) by 2025. They have also agreed on a voluntary global NCD target for a 25% relative reduction in the prevalence of raised blood pressure (defined as systolic blood pressure \geq 140 mmHg and/or diastolic blood pressure \geq 90 mmHg) by 2025."ⁱⁱⁱ

In support of the FDA moving toward a shorter timetable than 10 years for the long-term targets for sodium reduction in processed, packaged and restaurant foods, please consider the following points:

- The comments offered to FDA on its food categories did not call into question the fundamental approach the agency took and should not delay finalizing the long-term targets.
- The proposed potential revision of the Dietary Reference Intake for sodium should be accomplished by early 2019 and, if any resulting modifications of the long-term targets are needed, they can be done seamlessly.^{iv}
- The upper bounds for individual products need to be maintained because they are the one element of the FDA proposed guidance that gives consumers information on which they can make choices.

On the basis of the strong scientific data now available, APHA recommends that FDA move toward a more aggressive timetable than 10 years for the long-term targets for sodium reduction in processed, packaged and restaurant foods. We believe that an accelerated sodium reduction timeline is important for protecting the public from the harmful effects of mass exposure to the high levels of sodium currently present in our food supply, and to support healthier lives and healthier communities.

Sincerely,



Georges C. Benjamin, MD
Executive Director

ⁱ Bibbins-Domingo K, Chertow GM, Coxson PG, et al. (2010). Projected effect of dietary salt reductions on future cardiovascular disease. *The New England Journal of Medicine*, 362(7): 590-599.

ⁱⁱ Ibid.

ⁱⁱⁱ World Health Organization. Population sodium reduction strategies. Available at <http://www.who.int/dietphysicalactivity/reducingsalt/en/>

^{iv} Office of Disease Prevention and Health Promotion. (2016). DRI Activities Update – June 2016. Available at <https://health.gov/dietaryguidelines/dri/updates.asp>