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RE: Docket Number FSIS-2011-0014
Federal Register, Thursday, September 15, 2011
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Page 57050-57054

Dear FSIS Docket Clerk:

On behalf of the members of National Meat Association (NMA), we respectfully submit the following comments in response to the FSIS Notice, "Approaches to Reducing Sodium Consumption; Establishment of Dockets; Request of Comments, Data, and Information."

Organized in 1946, NMA represents the interests of meat packers and processors throughout the United States. With approximately 225 general member companies, all of whom are under Federal Inspection, NMA has a vested interest in the FSIS Notice, "Approaches to Reducing Sodium Consumption; Establishment of Dockets; Request of Comments, Data, and Information."

The Notice demonstrates a move by FDA and FSIS to regulate food manufacturers, particularly processed products, to reduce sodium levels in their products, when there is not a consensus on the actual effects of sodium on human health.

Though the Notice's intention is not related to food safety, it could have an effect on the reduction of food safety. Sodium has three functions in food processing: flavoring, binding and a microbiological food safety effect. For flavoring, meat product manufacturers use a certain amount of sodium in the formulation of their product. Their recipes are proprietary information. Changes to their recipes can lead to a diminished product in the eyes of the consumer, which would be detrimental to a company's product line.

Additionally, sodium serves a structural purpose for processed products. Sodium is used in curing mixtures of processed products. In addition, it plays a role in the preparation of processed meats by helping extract the myofibrillar proteins, thus giving binding strength where adjacent pieces of meat converge. A sodium standard that does not take into account individual

products that require certain amounts of sodium could lead to the diminished integrity or elimination of these products from the marketplace.

In terms of food safety, sodium is used in different forms as an antimicrobial intervention. For example, sodium is used as a means of reducing water activity in a product. For dry fermented sausage, sodium can be used to drop the water activity of the product in order to inhibit microbial outgrowth. Mandatory reductions in sodium levels could lead to a less safe product, which could present serious food safety concerns for consumers.

Further, many meat products use sodium lactate, sodium phosphate and sodium acetate as interventions to prevent the growth of *E. coli* O157:H7 on meat products, whether ground meat, meat cuts or meat trim. Residual of the intervention may remain in the product, yet its benefit to the product from a food safety standpoint is well documented in scientific literature. Reductions in the sodium content on these products will cause reductions in food safety.

Labeling

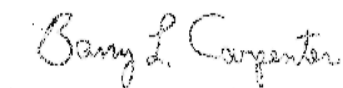
Processed products have Nutritional Facts printed on their labels, where consumers can visibly see how much sodium is contained in the product. If a consumer chooses to reduce sodium levels in their diet, the information is available to assist them in making their own purchasing decisions, as opposed to having government mandate a reduction across the board on food products.

Further, marketing claims in the form of “Reduced Salt” and “Reduced Sodium” already exist for those that choose to demonstrate that their products have a lower level of sodium in their products. These labeling claims have to be substantiated in order to receive approval by FSIS’s Labeling Program Policy Division (LPPD). If sodium reduction is required by Government, the manufacturers of these products will no longer have the benefits of their product placement in this niche market.

CONCLUSION

As reductions in sodium is not a food safety issue, NMA opposes any establishment of a sodium reduction standard. Sodium has a multiple benefits to food products, including flavoring, binding and food safety. Therefore, consumers should be allowed to continue making their own decision on what products they want to purchase without having Government setting standards on the reduction of sodium in products.

Thank you for providing this opportunity to comment.



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