

Sodium Reductions Through Legal Actions

APHA Meeting
Denver, Nov. 8, 2010

Michael F. Jacobson, Ph.D.
Executive Director
Center for Science in the Public Interest



Presenter Disclosure

Michael F. Jacobson

The following personal financial relationships with commercial interests relevant to this presentation existed during the past 12 months:

No relationships to disclose



Sodium in Packaged Foods



1 cup
990 mg



1 meal, 494 g
1,300 mg



1 cup
1,110 mg



1 Tbsp
1,160 mg



1 pizza, 156 g
1,190 mg



1 meal, 340 g
1,100 mg

Daily Value is 2,400 mg



High-Sodium Restaurant Foods

Denny's Lumberjack Slam 3,806 mg
(2 eggs, 2 pancakes, grits w/marg.,
toast, ham, 2 strips bacon, 2 links)

Reuben sandwich (from deli) 3,270 mg

Dunkin' Donuts Salt Bagel 3,540 mg

House Lo Mein 3,460 mg

Daily Value is 2,400 mg



Regulatory History of Salt

- 1958: Salt dubbed "generally recognized as safe" (GRAS) (no limits on its use)
- 1978: CSPI petitions FDA to regulate salt
- 1979: FDA committee: Salt *not* GRAS
- 1980: Dietary Guidelines: Avoid excess salt
- 1982: CSPI sues to force FDA action
- 1983: Court says to give FDA's approach—voluntary action—time to work



Voluntary Action

FDA/1987: 1981–1986

Industry had "not reduced the sodium content of established product lines."



Regulatory History of Salt (cont.)

- 2004: British government calls for 33% cuts/5 years, 50%/10 years; achieved 10%
- 2004: Havas *et al.*: 50% reduction in sodium in foods would save 150,000 lives per year
- 2005: CSPI re-petitions FDA to limit sodium
- 2007: FDA public hearing on sodium reduction; no action; NYC says FDA should urge cuts and regulate if necessary



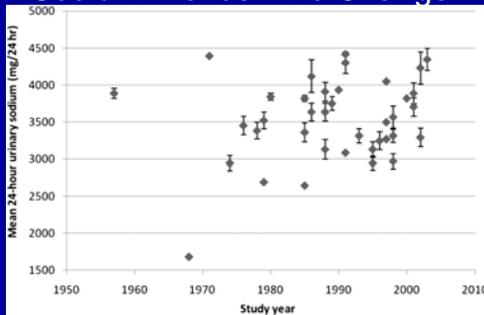
Voluntary Action (cont.)

CSPI: Average of 529 Packaged and Restaurant Foods

2005: 684 mg per 100 g
 2008: 670 mg per 100 g
 (-2%)



Proof is in the Pee: 24-h Urinary Sodium Trends—No Change



Source: Bernstein & Willett: AJCN, 11/2010



Regulatory History of Salt (cont.)

- 2010: IOM report: voluntary action since 1969 was a failure; recommended gradually decreasing limits on sodium
- 2010: NYC announces voluntary sodium targets
- FDA says sodium reduction is a high priority— but will it set limits or just call for voluntary action?



Sodium Challenges & Complexities

- Not a big question: GRAS or not GRAS
- Sodium citrate, MSG, sodium nitrite, etc.
- Sodium sources serve many purposes
- USDA regulates meat and poultry products
- SOI recipes & prior sanctions
- What to do about restaurants?
- Voluntary cuts: limitations



Lots of Low-hanging (Salty) Fruit

Sodium Content: Brand Variation

- Hunt's tomato paste has **5 times as much sodium** as Contadina's.
- Campbell's condensed vegetable soup w/beef stock has **3 times as much sodium** as Wolfgang Puck's hearty thick country vegetable soup.
- Quaker's caramel corn rice snacks has **3 times as much sodium** as Safeway's.



NYC Sodium Targets

Food	Sodium (mg/100g)		
	Now	2012	2014
Bread, rolls	485	440	360
Breakfast cereals	608	490	370
Dry soups	820	700	570

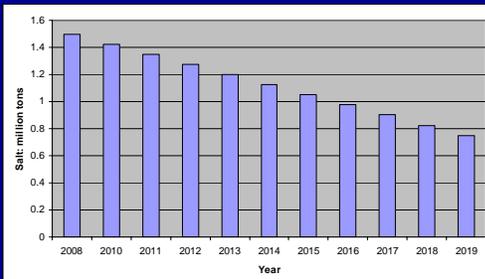


State/Local Options for Sodium Cuts

- Urge FDA/USDA to set sodium limits
- Urge Congress to hold hearings
- Limit sodium in school foods, gov't. cafeterias, prisons, hospitals
- Call on companies to voluntarily lower sodium or face regulatory action
- *Packaged* foods: require warning labels on high-sodium products (or notices on supermarket shelves or on placards)
- *Restaurant* foods: require warnings on high-sodium foods/meals



Cap and Reduce Salt Availability



A Sodium-reduction Plan

- Industry: aggressively cut sodium "voluntarily"
- FDA *and* USDA both need to be involved
- Lawyers need to lay out alternative strategies
- Federal/state/local cooperation
- *Simultaneous* voluntary and regulatory approaches; label warning notices as incentive

Alternatively

- Limit overall use of salt



Litigation

Vegetable Beef Soup	1,290 mg
Spicy Buffalo Chicken Melt	3,760 mg
Seasoned Fries	1,010 mg
Apple Pie	580 mg

Total: 6,630 mg

