



**American Dietetic Association**  
***Your link to nutrition and health.<sup>sm</sup>***

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February 10, 2006

Docket Clerk  
U.S. Department of Agriculture  
Food Safety and Inspection Service  
300 12<sup>th</sup> Street, SW  
Room 102 Cotton Annex  
Washington, DC 20250

SUBJECT: Docket No. 05-033IF; FDMS Docket Number FSIS-2005-0038

**Food Labeling; Nutrient Content Claims, Definition of the Term: “Healthy”**

The American Dietetic Association (ADA) represents almost 65,000 food and nutrition professionals who serve the public by promoting good health through diet and physical activity. ADA believes nutrition content claims and health claims should support and promote the importance of consuming a variety of foods and a well balanced meal plan. Labeling should assist the public in integrating foods into a well-balanced diet. ADA commends the Food Safety and Inspection Service (FSIS) for considering the term “healthy” and qualifying sodium levels for meals and individual foods and welcomes this opportunity to comment on the interim final rule published in the Federal Register (71 FR 1683-1686) on January 11, 2006.

ADA appreciates FSIS’s efforts to help consumers achieve the *Dietary Guidelines for Americans* and to the focus on the relationship between sodium intake and high blood pressure in the general population. ADA concurs that there is significant scientific agreement that lower dietary sodium levels reduce risk of hypertension. The 2005 *Dietary Guidelines for Americans* cites evidence that approximately 75 percent of sodium intake comes from processed foods.<sup>1</sup> In addition, any modifications made regarding the sodium levels in foods that bear the term “healthy” should be made solely on the basis of the industry’s capabilities to produce safe and acceptable products – not because scientific evidence is lacking on the usefulness of lowered sodium levels in the diet.

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<sup>1</sup> U.S. Department of Health & Human Services and U.S. Department of Agriculture. *Dietary Guidelines for Americans, 2005*. 6<sup>th</sup> Edition, Washington, DC: U.S. Government Printing Office, January 2005.

In the current definition, a “healthy” food must still be low in fat and saturated fat and contain limited amounts of cholesterol and sodium. In addition, if it’s a single-item food, it must provide at least 10 percent of one or more of vitamins A or C, iron, calcium, protein, or fiber. The first-tier sodium levels provide a reduction of sodium levels over many products available in the marketplace. This sodium level also provides consistency between FSIS and the Food and Drug Administration use of the term “healthy” which is also imperative for preventing consumer confusion.

The 2005 Dietary Guidelines for Americans and the companion brochure “Finding Your Way to a Healthier You” advise consumers to “*Reduce sodium (salt), increase potassium. Research shows that eating less than 2,300 mg per day may reduce the risk of high blood pressure. Most of the sodium people eat comes from processed foods, not from the saltshaker. Also look for foods high in potassium, which counteracts some of sodium’s effects on blood pressure.*”<sup>2,3</sup> To help consumers achieve this goal, they need to have lower sodium choices available to help reduce sodium intake.

If those products fall short on taste and food quality expectations, however, consumers are less likely to purchase and consume those foods and more likely to purchase foods that will meet their expectations for taste, texture and other qualities. Should consumers decide to forgo “healthy” options in favor of those with higher levels of fat, saturated fat, cholesterol, and sodium, the rationale behind this proposal could be undermined.

ADA encourages FSIS to continue to carefully evaluate the levels of sodium in meat and poultry products that are appropriate associated with the use of the term “healthy” and to consider all options that help consumers reduce their sodium intake. Thank you for your careful consideration of this important public health issue.

For additional information or clarification, please contact Mary Hager, PhD, RD, Senior Manager for Regulatory Affairs at 202-775-8277, ext. 6007 or [mhager@eatright.org](mailto:mhager@eatright.org), or Jennifer Weber, Manager for National Nutrition Policy at 202-775-8277, ext. 6012 or [jweber@eatright.org](mailto:jweber@eatright.org).

Sincerely,

/S/

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<sup>2</sup> Ibid.

<sup>3</sup> U.S. Department of Health & Human Services and U.S. Department of Agriculture. Finding Your Way to a Healthier You: Based on the *Dietary Guidelines for Americans*. (Consumer Brochure ) <http://www.health.gov/dietaryguidelines/dga2005/document/html/brochure.htm#b2>. Accessed February 10, 2006.