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Documents Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

RE: Food Labeling; Nutrient Content Claims, Definition of Sodium Levels for the  
Term "Healthy"  
Docket Nos. 91N-384H and 96P-0500

Quest International manufactures and markets flavors and food ingredients to food processors. Quest's work focuses on creating what consumers describe as the traditional taste, texture and nutrition in further processed foods. Although consumers are increasingly interested in convenient and "healthy" food choices, consumers have been clear in indicating that taste is the primary factor responsible for food choices.

Salt is a critical ingredient in developing the taste and texture of many foods. Salt is especially important to the taste and texture of processed meat and poultry products. In these products salt delivers multifunctional performance through its impact on taste, texture and microbiological stability. The added salt enhances the flavor of these products by complementing naturally occurring flavor enhancers including glutamic acid and 5'-ribotides. Salt is responsible for extracting muscle protein which coagulates upon cooking and forms the typical texture and appearance that consumers recognize as processed meat and poultry products. The addition of salt to processed meat and poultry products is also important in enhancing the microbiological stability of these products by inhibiting the development of harmful and off-flavor generating microorganisms. Indeed, salt is one of the oldest preservation methods known to mankind.

91N-384H

C125



A member of the ICI Group



Technical alternatives to the multifunctional performance of salt in meat and poultry products continue to be elusive. Although there are alternatives for each of the cited functionalities, no single ingredient solution has been identified. Furthermore, some of the alternatives to salt bring their own disadvantages. For example, potassium chloride can replace the preservation function of salt but the impact on flavor is not acceptable. Although flavor suppliers have done considerable work to develop bitterness blockers and flavor enhancers that can be employed to reduce the reliance on salt, no satisfactory solution has been identified nor is there reason to believe such a breakthrough will become commercially available within the next five years.

We urge the FDA to not further reduce the sodium content of prepared meat and poultry products that may be declared "healthy". Such a regulation would greatly impact the consumer acceptability of these products and likely result in the loss of a healthy food choice to consumers.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Don Boudreaux', is written over a horizontal line.

Don Boudreaux, Ph. D.  
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Quest Foods, North America