



October 26, 2016

Leslie Kux, Associate Commissioner for Policy  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

Dear Associate Commissioner Kux:

On behalf of the American Academy of Family Physicians (AAFP), which represents 124,900 family physicians and medical students across the country, I write in response to the “Voluntary Sodium Reduction Goals: Target Mean and Upper Bound Concentrations for Sodium in Commercially Processed, Packaged, and Prepared Foods” (Docket No. FDA–2014–D–0055) [draft guidance](#) published by Food and Drug Administration (FDA) in the June 2, 2016, *Federal Register*. This guidance describes voluntary short-term and long-term goals for sodium reduction in a variety of identified categories of foods that are commercially processed, packaged, or prepared. The FDA goal is to address the excessive intake of sodium in the population and promote improvements in public health.

The AAFP applauds the FDA for releasing this guidance. We agree with the FDA and expert advisory panels that scientific evidence supports the value of reducing sodium intake in the general population. Furthermore we concur that the current U.S. intake of sodium is excessive, that it should be reduced, and that reduction in sodium intake is expected to result in a significant public health benefit. We therefore support efforts to reduce sodium intake since research has found that reduction would save between 280,000 and 500,000 premature deaths over 10 years and that sustained sodium reductions would prevent additional premature deaths.

Though the FDA is not conducting rulemaking with regard to sodium and these goals are voluntary, the AAFP acknowledges the potential and significant benefits to public health in sodium reduction. We support the FDA’s role in exploring effective and efficient strategies to promote sodium reduction in the food supply. The AAFP shares the FDA’s hope that voluntary goals can be an effective means to achieving significant benefits to public health through sodium reduction in commercially processed, packaged, and prepared foods since most people in the United States get more sodium in their diets than they need.

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We appreciate the opportunity to comment on this guidance and make ourselves available for any questions you might have. Please contact Robert Bennett, Federal Regulatory Manager, at 202-232-9033 or [rbennett@aafp.org](mailto:rbennett@aafp.org).

Sincerely,

A handwritten signature in black ink that reads "Wanda D. Filer, MD". The signature is written in a cursive, flowing style.

Wanda D. Filer, MD, MBA, FAAFP  
Board Chair

CC:  
Kasey Heintz, Center for Food Safety and Applied Nutrition