

September 17, 2019

Division of Dockets Management
Food and Drug Administration
Department of Health and Human Services
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Comment on Draft Guidance Regarding Use of an Alternate Name for Potassium Chloride in Food Labeling (Docket No. FDA-2019-D-0892)

The Center for Science in the Public Interest (CSPI) and the Sustainable Food Policy Alliance (SFPA) respectfully submit the following comments on the Food and Drug Administration's (FDA's) Draft Guidance for Industry Regarding the Use of an Alternate Name for Potassium Chloride in Food Labeling.

CSPI is a non-profit consumer education and advocacy organization that has worked since 1971 to improve the public's health through better nutrition and safer food. CSPI provides nutrition and food safety information to consumers and has long advocated for legislation, regulation, and judicial rulings to ensure that food labels and advertising are clear and transparent, and that they convey useful and relevant public health information. The organization does not accept government or corporate grants and is supported primarily by the half a million subscribers to its Nutrition Action Health letter.

SFPA is a coalition of four of the world's best-known food companies—Danone North America, Mars Incorporated, Nestle USA, and Unilever United States—seeking to accelerate the pace of change in the food industry through individual company leadership and collective support for public policies that raise the bar and inspire further action.

CSPI and SFPA urge the FDA to amend the draft guidance to permit manufacturers to use the name "potassium salt" in the ingredient statement as a common or usual name for potassium chloride. We support the declaration of the name "potassium salt" as an alternative to the name "potassium chloride" because the name "potassium salt" would be recognized as a common or usual name to at least the same degree as "potassium chloride salt" and would be more accepted by consumers, which would help manufacturers facilitate sodium reduction efforts in processed foods and improve public health.

More consumers report that they recognize the term "potassium salt" than "potassium chloride salt." In a nationally representative survey of 1,000 American adults conducted in June 2019, more consumers reported having heard of "potassium salt" being used as a food ingredient than "potassium chloride salt."¹ Should the FDA permit the term "potassium salt" in place of "potassium chloride" on ingredient labels, the action would generate publicity, accelerate

¹ International Food Information Council. *Survey of American adults on familiarity, perceptions, and attitudes around the use of alternative names for potassium chloride in food labeling*. June 2019.
<https://foodinsight.org/surveys-kcl/>

consumer awareness of this term, and increase its acceptance as the common or usual name of potassium chloride.

The term “potassium salt” is more likely to be accepted by consumers and manufacturers. Consumers lack familiarity with the term “potassium chloride” and, due to the word “chloride,” may associate it with chlorine and other chemicals. In a survey of American adults conducted in June 2019, it was found that consumers have somewhat more negative associations with the term “potassium chloride salt” than the term “potassium salt.”² We believe including the word “chloride” could unintentionally dissuade consumers from consuming products containing salt substitutes. Allowing the use of a name like “potassium salt,” which meets with consumer expectations, would make it easier for manufacturers to reformulate their products to partially replace sodium chloride with potassium chloride. This in turn supports the public health goal of reducing sodium intake.

Consumers are not likely to confuse “potassium salt” with sodium chloride or other potassium-containing salts. Just as the FDA allows cornstarch to be called “starch” because it is the most widely recognized ingredient in a class of ingredients (starches),³ it should allow potassium chloride to be called “potassium salt,” as it is the most widely recognized ingredient in its class (potassium salts). Since all other salts of potassium would still bear their own distinctive chemical names, consumers would be unlikely to confuse them with potassium chloride if labeled “potassium salt.” Consumers would also not confuse “potassium salt” with “salt,” as it is readily distinguishable by the word “potassium.”

Leading health authorities are using “potassium salt” as a common name. A number of leading health authorities around the world are using “potassium salt” as a common name alternate to “potassium chloride” including Harvard School of Public Health⁴; World Action on Salt and Health⁵; Hypertension Canada, and World Hypertension League.⁶ In addition, Heart & Stroke, Hypertension Canada, Diabetes Canada, and Dietitians Canada have urged Health Canada and the CFIA to allow use of “potassium salt” to the Permitted Synonyms for Food Additives Table in order to facilitate sodium reduction in Canada.⁷

² *Id.*

³ CPG Sec. 578.100 Starches – Common or Usual Names. October 1980.

⁴ Harvard T.H. Chan School of Public Health. *Potassium*. The Nutrition Source. n.d.

<https://www.hsph.harvard.edu/nutritionsource/potassium>. Accessed September 17, 2019.

Harvard T.H. Chan School of Public Health. *Take Action: How to Reduce Your Sodium Intake*. The Nutrition Source. n.d. <https://www.hsph.harvard.edu/nutritionsource/salt-and-sodium/take-action-on-salt/>. Accessed September 17, 2019.

⁵ Action on Salt, World Action on Salt and Health, and Blood Pressure UK. The use of potassium-based sodium replacers to reduce UK population salt intake. n.d. <http://www.worldactiononsalt.com/media/action-on-salt/FINAL-Policy-Position-Statement-Potassium-Salt.pdf>. Accessed September 17, 2019.

⁶ Hypertension Canada. Organizational Position Statement—Dietary Potassium. January 2019.

<https://hypertension.ca/wp-content/uploads/2019/01/Position-Statement-on-Dietary-Potassium-Hypertension-Canada-January-2019.pdf>. Accessed September 17, 2019.

⁷ Heart & Stroke, Hypertension Canada, Diabetes Canada, Dietitians of Canada, and World Hypertension League. Letter to Health Canada. March 22, 2019. <https://hypertension.ca/wp-content/uploads/2017/08/2019-03-22-Health-Consortium-Potassium-Salt-Letter-to-Health-Canada-March-2019.pdf>. Accessed September 17, 2019.

We therefore encourage the FDA to amend its draft guidance to allow the use of “potassium salt” as a common or usual name for potassium chloride. Using the term “potassium salt” on ingredient labels could be more effective than using the term “potassium chloride salt” at supporting the public health goal of reducing sodium intake. Moreover, the name “potassium salt” is consistent with the FDA’s general principles of ingredient naming, in that it accurately describes the ingredient and would not lead to consumer confusion.

Sincerely,

Center for Science in the Public Interest

Sustainable Food Policy Alliance, including
member companies Danone North America,
Mars, Incorporated, Nestlé USA and
Unilever United States