

September 17, 2019

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

RE: Comment on Draft Guidance Regarding Use of an Alternate Name for Potassium Chloride in Food Labeling (Docket No. FDA-2019-D-0892)

Dear Dr. Sharpless:

The Academy of Nutrition and Dietetics (the “Academy”) is pleased to provide comments on the Food and Drug Administration (FDA) at the Department of Health and Human Services’ (HHS’s) “Draft Guidance Regarding Use of an Alternate Name for Potassium Chloride in Food Labeling (Docket No. FDA-2019-D-0892).” Representing more than 107,000 registered dietitian nutritionists (RDNs), nutrition and dietetic technicians, registered (NDTRs), and advanced-degree nutritionists, the Academy is the largest association of food and nutrition professionals in the United States and is committed to accelerating improvements in global health and well-being through food and nutrition.

A. Overview

The Academy supports the declaration of the name “potassium salt” in the ingredient statement as an alternative to the name “potassium chloride.” The name “potassium salt” would be recognized as a common or usual name to at least the same degree as “potassium chloride salt” and be more accepted by consumers and manufacturers, facilitating sodium reductions in processed foods and improving public health. We therefore urge the FDA to amend the draft guidance to permit manufacturers to use the name “potassium salt” as a common or usual name for “potassium chloride.”

B. Academy's Labeling Principles

The Academy adopted in 2014 the following principles for labeling initiatives to guide development of our regulatory comments and policy stances. Those principles specifically relevant to the draft guidance and the Academy's response to the FDA's request for comments are bolded below.

- 1. Label claims should be clear and understandable to consumers; consumers' nutrition literacy is key to promoting understanding.**
- 2. The label must be truthful and not misleading.**

3. **Content on the label should help consumers make informed decisions to build a healthy diet.**
4. Labels should help to provide understanding about the nutrient density and overall healthfulness of overall food rather than a focus on particular nutrients.
5. Label content should have consistent type and format so products can be read and consumers can make product comparisons.
6. Labeling should enhance consistency among the various government nutrition recommendations.
7. All claims should include labeling of accurate quantitative information about the dietary substance, including percent of Daily Value in a single serving of the products, when known, or the daily dietary intake necessary to achieve the claimed effect.
8. **Consumer research is imperative before making changes to the label.**
9. The label is only a source of information, and thus sustained support for educational programs and individual counseling by registered dietitian nutritionists is essential.

C. Applying the Labeling Principles

Consumer research shows that “potassium salt” is recognized to at least the same degree as “potassium chloride salt.” In a nationally-representative survey of 1,000 consumers 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 consumer awareness of this term, and increase its acceptance as the common or usual name of potassium chloride.

The name “potassium salt” is more likely to be accepted by consumers and manufacturers. Consumers lack familiarity with the term potassium chloride and some may associate it with chlorine and other chemicals because of the word “chloride.” In a survey sponsored by Campbell Soup Co. of 312 consumers and conducted in May 2019, 22 percent of consumers stated that the presence of an ingredient called “potassium chloride salt” would make them less likely to purchase a product, while only 2% of consumers stated that “potassium salt” would make them less likely to purchase a product.² In a previous survey, among consumers shown an ingredient label and asked “Are there any ingredients in this label that cause concern for you?,” only 19 percent identified “potassium salt” as an ingredient that causes concern while 26 percent identified “potassium chloride” as an ingredient that causes concern.³ 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. Thus, content on the label is likely to help consumers make informed decisions to build a healthy diet and supports the public health goal of reducing sodium intake.

The Academy believes that label claims should be clear and understandable to

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/>

² Docket No. FDA-2019-D-0892. Comment from Campbell Soup Company. July 12, 2019.

³ FDA-2016-P-1826. Citizen Petition from NuTek Food Science LLC. June 28, 2016.

consumers; 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),⁴ it should allow potassium chloride to be used as 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 modifier “potassium.”

The Academy appreciates the opportunity to offer comments regarding this draft guidance and encourage the FDA to allow the use of “potassium salt” as a common or usual name for potassium chloride. The name “potassium salt” would be recognized to at least the same degree as “potassium chloride salt,” and would be more effective at supporting the public health goal of reducing sodium intake. Moreover, the name 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. Please contact either Jeanne Blankenship at 312-899-1730 or by email at jblankenship@eatright.org or Pepin Tuma at 202-775-8277 ext. 6001 or by email at ptuma@eatright.org with any questions or requests for additional information.

Sincerely,



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⁴ CPG Sec. 578.100 Starches – Common or Usual Names. October 1980.