



January 17, 2019

Submitted via email to HP2030@hhs.gov.

Developing Healthy People 2030
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, DC 20201

Re: Nutrition and Weight Status Core Objectives: NWS-2030-10: “Reduce consumption of saturated fat in the population aged 2 years and older.” and NWS-2030-11: “Reduce consumption of sodium in the population aged 2 years and older.”

To Whom It May Concern:

The North American Meat Institute (NAMI or Meat Institute) is the leading voice for the meat and poultry industry. The Meat Institute has a rich, century-long history and provides essential member services including legislative, regulatory, scientific, international, and public affairs representation. Together, the Meat Institute’s members produce the vast majority of U.S. beef, pork, lamb, and poultry, in addition to the equipment, ingredients, and services needed to produce the safest and highest quality products.

Consumer health is a driving force in producing meat and poultry products. Ensuring consumer health involves both offering nutrient dense protein food products and ensuring their safety. The Meat Institute supports the premise that eating a balanced, healthful diet from all food groups and engaging in moderate exercise are the keys to a healthy lifestyle. NAMI members are committed to supporting healthy dietary patterns and lifestyles for consumers by providing them with a variety of products to meet specific individual dietary needs.

Public health programs and regulatory initiatives should be supported by high quality scientific evidence. Healthy People objectives outline 10-year national health objectives to promote health, eliminate health disparities, and prevent disease. These national health objectives are supported and driven by data informing approaches to improve public health. Metric driven public health goals are verifiable ways to improve public health. Monitoring progress and reporting intermediate information are keys to ensuring objectives remain achievable. The Meat Institute appreciates the opportunity to provide comments on the development of Healthy People 2030.

Policies should be based on the Totality of the Scientific Evidence.

Policy and other guidance recommendations should be based on the strongest scientific evidence available. The totality of the scientific evidence must be considered when developing public health goals because emerging scientific evidence may provide additional insights into more appropriate dietary recommendations. Science is constantly evolving, and as new evidence becomes available, it should be incorporated into the policy decision-making process because the totality of scientific evidence may affect policies.

Vilifying Individual Nutrients can have Adverse Unintended Consequences.

Over the last four decades, several nutrients have been highlighted for concern, *e.g.*, fat and cholesterol. Yet, today, more robust scientific evidence shows those concerns are either unjustified or questionable. During those decades, consumers reacted by avoiding those nutrients – but at what expense? Does not drinking chocolate milk because of the added sugars outweigh the benefits of not drinking milk? Recommendations to eat a low-fat diet often led to overconsuming other foods, which meant one over-consumed dietary component merely replaced another.

A thoughtful, measured approach must be considered when drawing attention to certain nutrients. Healthy People 2030 objectives should be mindful of a total diet approach, where all foods can fit in moderation when combined with physical activity, for optimal health outcomes instead of vilifying individual nutrients.

Sodium is Critical to Ensuring Meat and Poultry Safety.

Salt, or sodium chloride, plays a critical role in producing meat products – whether used by large commercial processors, local butchers, or even within the consumer’s home – to improve the flavor, texture, and safety of those products. In addition to playing a critical role in meat production, salt is also intrinsic. Reducing sodium is not as simple as adding less and sending the product to market. The meat and poultry industry must ensure there are no unintended food safety consequences associated with product reformulation, while still meeting consumer flavor and quality expectations.

Salt’s role as a preservative and food safety ingredient is one aspect of a multi-hurdle approach used to ensure product safety. In the last 20 years, the meat and poultry industry has also learned in a more quantitative fashion the importance of sodium chloride in managing pathogenic bacterial risks presented by *Listeria monocytogenes*, *Salmonella*, and pathogenic *Escherichia coli* in meat and poultry items.

The functionality of sodium and sodium compounds when added to muscle tissues affects the quality of a meat or poultry product. Sodium in the form of sodium chloride is the primary source of added sodium to meat and poultry products. Sodium phosphates, sodium nitrite, sodium lactate, among others, are all sodium compounds used by the meat and poultry industry in developing products. Compounds such as sodium chloride have important quality, shelf-life, myofibrillar functionality, and food safety properties that improve the quality of meat and poultry products.

The meat and poultry industry is constantly evaluating new technologies as it investigates effective solutions for greater sodium reductions over the long term. However, sodium reduction is complex. Similar to other food industry sectors, the meat and poultry industry must balance consumer taste preferences, food safety, and functionality. Compromising product safety is not an option for the industry. Similarly, consumers will not compromise their preferences on taste and value. Voluntary sodium reduction guidance and targets should result in achievable, practical, and meaningful nutrition recommendations for the food industry capable of producing a quantifiable improvement in the health of Americans, without causing adverse, unintended consequences.

Emerging Scientific Evidence Should be Considered When Setting Public Health Objectives.

Recent evidence has shown there could be adverse health outcomes from reducing sodium intake below certain levels. The Institute of Medicine (IOM) determined that studies regarding sodium intakes and health outcomes are inconsistent in quality and insufficient in quantity to conclude that sodium intakes below 2,300 mg/day either increase or decrease the risk of heart disease, stroke, or all-cause mortality in the general population.¹ Graudal *et al* concluded a range of sodium intakes (2,695-4,945 mg) is associated with the most favorable health outcomes, with increased risk of cardiovascular disease (CVD) or mortality at both high and low sodium intake.² Further, Mente *et al* concluded the risk of CVD and death increased with low sodium intake (less than three g/day) regardless of hypertension status, while a higher risk of CVD or death may be present in those with hypertension that have a high sodium intake (more than seven g/day).³ These findings demonstrate that adverse health outcomes are possible if sodium intake is lowered in a healthy population.

This evidence is new and significant and is likely among the reasons why a review of the Dietary Reference Intakes (DRI) for sodium and potassium is underway. DRIs reflect nutrient reference values essential to national nutrition policies.⁴ The review is considering indicators of deficiency, inadequacy, and toxicities, as well as relevant chronic disease endpoints.

Regarding NWS-2030-10, a 2010 meta-analysis of prospective epidemiologic studies showed there is no significant evidence to conclude dietary saturated fat is associated with an increased risk of coronary heart disease or CVD.⁵ Although these findings were controversial, there is a growing body of evidence that saturated fats may not be as harmful to humans as previously believed.

¹ IOM (Institute of Medicine). 2013. *Sodium intake in populations: Assessment of evidence*. Washington, DC: The National Academies Press.

² Niels Graudal, Gesche Jürgens, Bo Baslund, and Michael H. Alderman. (2014) Compared With Usual Sodium Intake, Low- and Excessive-Sodium Diets Are Associated With Increased Mortality: A Meta-Analysis. *Am J Hypertens*. 27:1129-37.

³ Andrew Mente, Martin O'Donnell, Sumathy Rangarajan, Gilles Dagenais, Scott Lear, Matthew McQueen, Rafael Diaz, Alvaro Avezuem, Patricio Lopez-Jaramillo, Fernando Lanas, Wei Li, Yin Lu, Sun Yi, Lei Rensheng, romaine Iqbal, Prem Mony, Rita Yusef, Khalid Yusoff, Andrzej Szuba, Aytekin Oguz, Annika Rosengrenm, Ahmad Bahonarm Afzalhussein Yusufali, Aletta Elisabeth Schutte, Jephath Chifamba, Johannes F E Mann, Sonia S Anand, Koon Teo, S Yusef, (2016) Associations of urinary sodium, excretion with cardiovascular events in individuals with and without hypertension: a pooled analysis from four studies. *Lancet*. 388:465-75.

⁴ <https://health.gov/dietaryguidelines/dri/nutrient-assessment.asp>. Accessed January 13, 2019.

⁵ Siri-Tarino, Patty W, Sun, Q. Hu, F., Krauss, R.M. Meta-analysis of prospective cohort studies evaluating the association of saturated fat with cardiovascular disease. *The American Journal of Clinical Nutrition*, Volume 91, Issue 3, 1 March 2010, Pages 535–546, <https://doi.org/10.3945/ajcn.2009.27725>. <https://academic.oup.com/ajcn/article/91/3/535/4597110>. Accessed January 13, 2019.

The totality of the evidence, including emerging, high-quality evidence on both sodium and saturated fat intake, must be considered before setting public health goals for a healthy population. To do otherwise risks using incomplete science, which could have unintended consequences that negatively affect American health.

Summary

Meat and poultry products play an important role in a healthy, well-balanced diet. Including meat and poultry in the diet allows consumers to fulfill more easily their essential amino acid and nutrient requirements. Policy and other guidance recommendations should be based on the strongest scientific evidence available.

Thank you for the opportunity to provide these comments. If you have questions about these comments or would like to discuss them, please contact me at 202-587-4200.

Respectfully submitted,



Susan L Backus

Vice President, Regulatory and Scientific Programs

cc: Julie Anna Potts
Mark Dopp
Barry Carpenter