

Oral Comments General Mills, Inc.

FDA Public Hearing on Salt/Sodium

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Kathryn L. Wiemer, MS, RD

Director and Fellow

General Mills Bell Institute of Health and Nutrition



General Mills' Comments and Recommendations

GRAS Status

- ❖ **General Mills supports neither revoking the GRAS status of salt nor establishing a food additive regulation for salt**

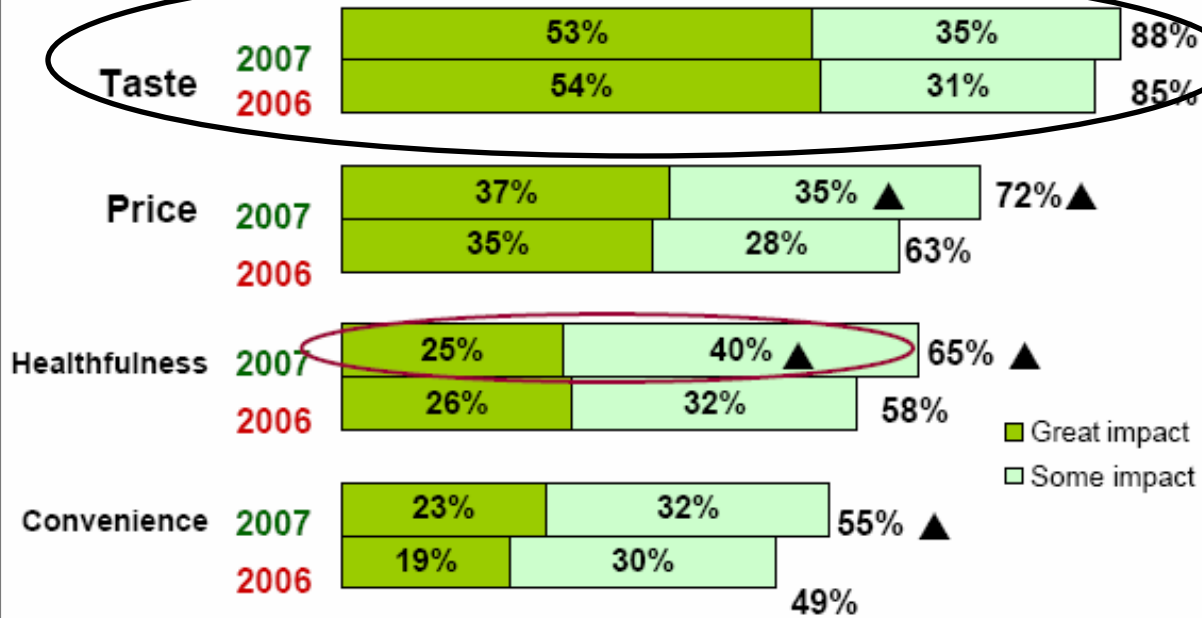
- ❖ **Establishing a food additive regulation for salt that includes varying ceilings for products:**
 - **Would require enormous agency resources**
 - **Is not supported by science**
 - **Would be ineffective in achieving reduced sodium intakes**
 - ✓ Incredibly challenging to establish appropriate levels for different categories of foods that satisfy product safety, functionality and taste acceptance requirements

- ❖ **General Mills supports a regulatory system that provides positive incentives for step-wise sodium reductions in an achievable and cost-effective manner**
 - ✓ Slow step-wise reductions are a better option to achieve the overall goal of sodium reduction in the American diet
 - ✓ Retraining the palate through gradual reductions is likely to be most effective since taste is still the number one driver for food purchase

Consumer Challenges: What Do We Know?

Taste is the major factor influencing purchase decisions; healthfulness is an emerging factor!!

How much of an impact do the following have on your decision to buy foods and beverages? (n=1000)

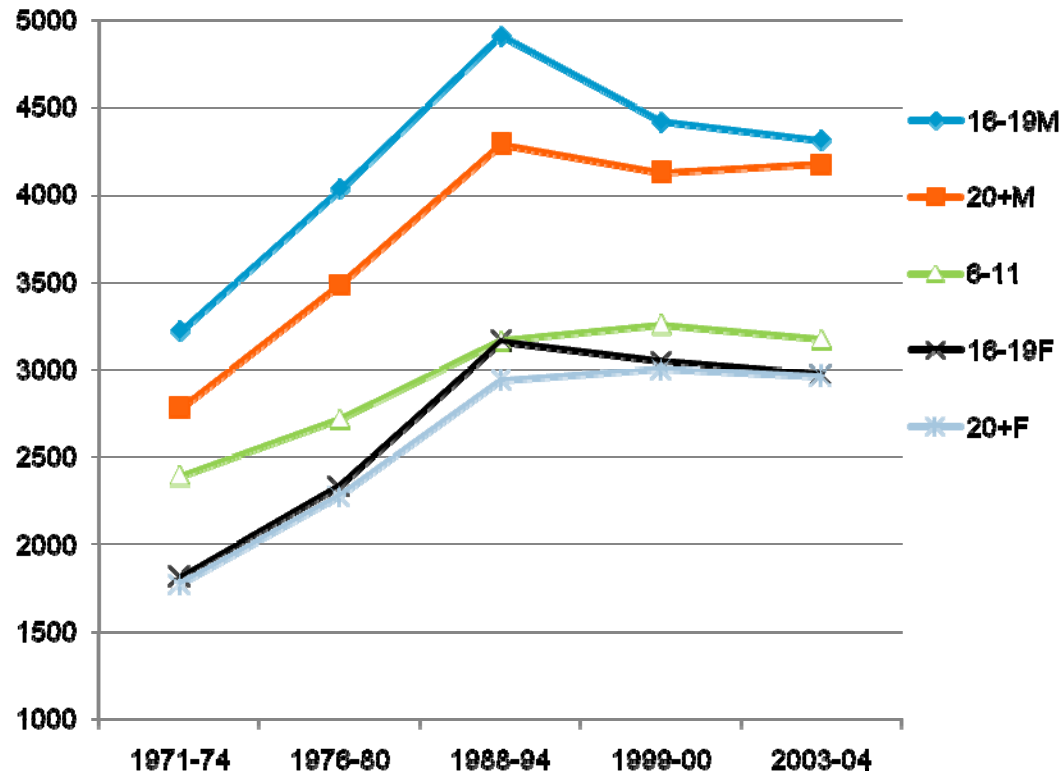


▲ Significant increase from '06

IFIC Foundation Food and Health Survey 2007

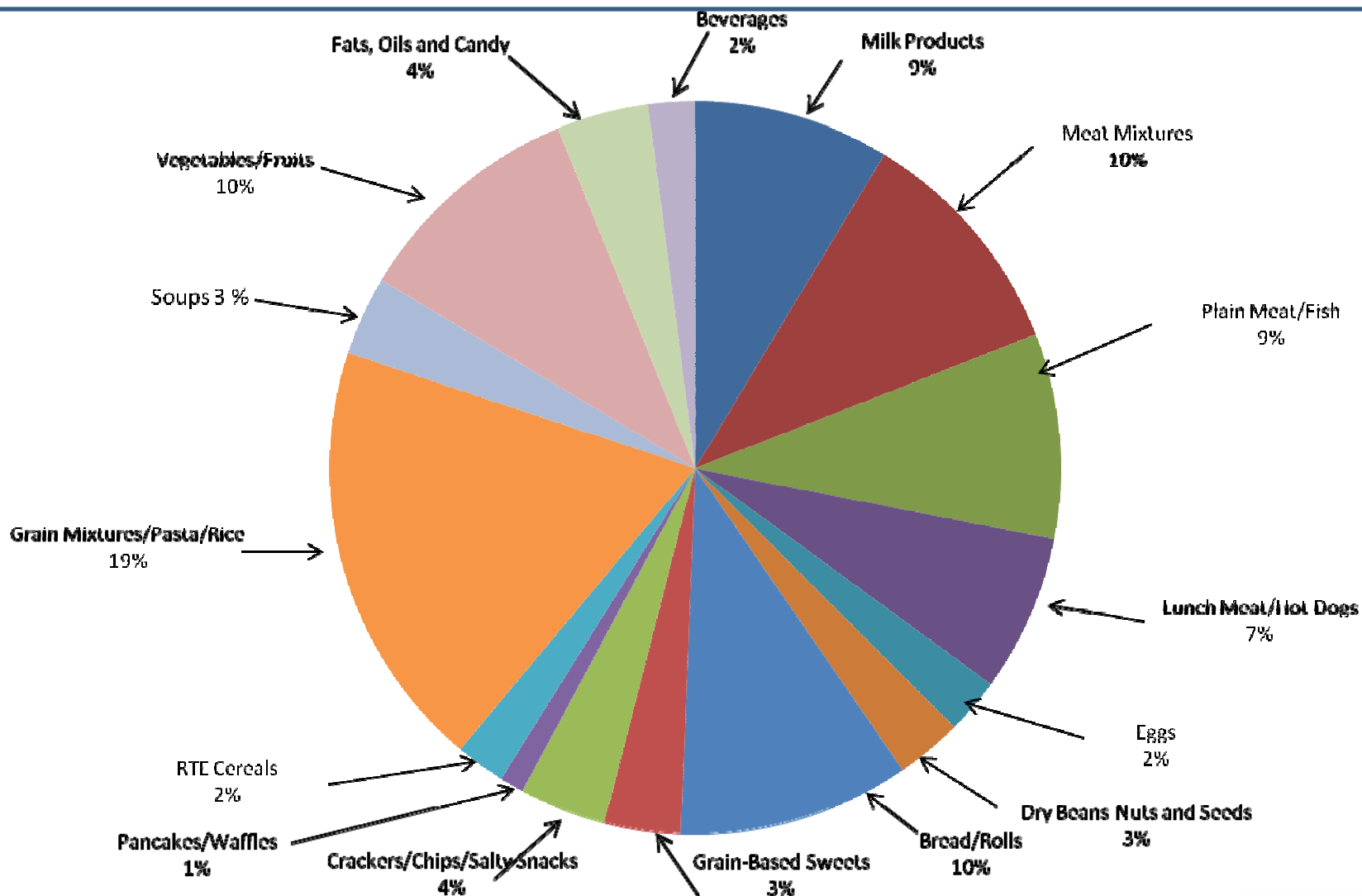


Sodium Intake Trends



Source: NHANES 2003-04

❖ Sodium is ubiquitous in food supply
 ❖ In order to achieve a significant dietary shift, sodium reductions across nearly all food categories will be necessary



Food Sources of Sodium--Total Population 2 + Years

Top 20 Individual Food Sources of Sodium in the American Diet

Based on the Combination of Frequency of Consumption and Sodium Content

1. Meat Pizza
2. White Bread
3. Processed Cheese
4. Hot Dogs
5. Spaghetti w/ Sauce
6. Ham
7. Catsup
8. Cooked Rice
9. White Roll
10. Wheat Tortilla
11. Salty Snacks/Corn Chips
12. Whole Milk
13. Cheese Pizza
14. Noodle Soups
15. Eggs Whole/Fried/Scrambled
16. Macaroni w/Cheese
17. Milk 2%
18. French Fries
19. Creamy Salad Dressings
20. Potato Chips

General Mills Comments and Recommendations

Incentives

❖ Expanded labeling claims, tax incentives and changes in standards of identity will spur innovation in the food industry resulting in wider options for consumers

Claims

- Currently approved claims are limited and thus ineffective in reducing sodium intake
 - ✓ The requirement for “low sodium” (140 mg) is very difficult to achieve for most products
 - ✓ 25% reduction doesn’t support a gradual step-wise decrease
 - For many products, achieving a 25% reduction in sodium without altering consumers’ taste expectation can be challenging
- Develop options to claim “moderate” sodium reductions (e.g., 10%, 15%, 20%) in products
 - ✓ Encouraging smaller reductions spread across a wide array of food products would have a significant public health impact

General Mills Comments and Recommendations

Incentives

Tax Incentives

- ✓ Offering industry tax incentives to offset the increased cost of using/developing alternative salt substitutes

Standards of identity

- ✓ Redefine to include salt substitutes

Research

- ✓ Increased federal funding to drive innovation for sodium/salt reduction technology

Summary

- ❖ **General Mills neither supports revoking the GRAS status of salt nor establishing a food additive regulation for salt**
- ❖ **General Mills supports:**
 - ✓ **A regulatory system that provides positive incentives for step-wise sodium reductions in an achievable and cost-effective manner**
 - ✓ **Expanded claims for labeling, tax incentives and changes in standards of identity to spur innovation in the food industry, resulting in wider options for consumers**

General Mills believes this approach will effectively help consumers reduce sodium in their diets