

Memorandum

Date: August 8, 2024

From: Office of Food Additive Safety

To: Administrative Record: Voluntary Sodium Reduction Goals: Target Mean and Upper Bound Concentrations for Sodium in Commercially Processed, Packaged, and Prepared Foods (Edition 2): Draft Guidance for Industry (Docket No. FDA-2014-D-0055) (the Draft Voluntary Sodium Guidance Edition 2))

Subject: Summary of Updates to the Draft Voluntary Sodium Guidance (Edition 2) from the Previous Final Voluntary Sodium Reduction Goals Guidance Published in October 2021 (Docket No. FDA-2014-D-0055).

FDA has made the following updates to the Draft Voluntary Sodium Guidance (Edition 2) from the Final Voluntary Sodium Guidance that was published in October 2021:

Update	Details
Categories	<ul style="list-style-type: none"> • 15 categories were updated to include or exclude restaurant data, based on availability of data to create a category (i.e., data for 5 or more restaurants were available). • Subcategories were created for 3 categories: <ul style="list-style-type: none"> • Dry Mix Meals – No Meat Added During Preparation <ul style="list-style-type: none"> ○ Liquid seasoning/sauce and dry seasoning • Dry Mix Meals – Meat Added During Preparation <ul style="list-style-type: none"> ○ Liquid seasoning/sauce and dry seasoning • Poultry – Not Breaded <ul style="list-style-type: none"> ○ With seasoning/sauce and in solution
Category descriptions	<ul style="list-style-type: none"> • Some category descriptions were updated for clarity. • Some additional examples of inclusions or exclusion were noted for clarity.
Non-Targeted Foods	<ul style="list-style-type: none"> • Additional examples of non-targeted foods were included in the “Non-Target Categories” table (Table 2 of the Draft Voluntary Sodium Guidance (Edition 2)).
Guidance Table	<ul style="list-style-type: none"> • Phase II (3-year) targets were added.
Data Sources/Measurements	<ul style="list-style-type: none"> • FDA used updated years of food label data from Mintel Global New Product Database, Syndigo, and Label Insight from 2021 and 2022 linked to Circana sales data from 2021. • FDA collected packaged food images and data for about 7,000 additional products found in U.S. retail locations in 2022 to supplement (and validate) other data sources.

	<ul style="list-style-type: none">• FDA collected restaurant menu and nutrition data in 2022 for 100 top U.S. chain restaurants. Fifty-nine of these restaurants provided some items with serving size (weight) of food items for use in determining sodium concentrations.
Targets	<ul style="list-style-type: none">• FDA reviewed over 300 peer-reviewed publicly available food science journal articles on sodium/sodium reduction strategies to inform targets.• FDA reviewed updates from other sodium reduction initiatives such as Health Canada’s evaluation of progress toward voluntary targets from 2012 to 2016¹ to inform targets.• FDA consulted with subject matter experts from the FDA CFSAN Office of Food Safety and from the USDA Food Safety and Inspection Service to inform targets.

¹ Sodium Reduction in Processed Foods in Canada: An evaluation of Progress toward Voluntary Targets from 2012 to 2016.