

August 1, 2016

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket No. FDA-2014-D-0055. Voluntary Sodium Reduction Goals:
Target Mean and Recommended Maximum Concentrations for Sodium in
Commercially Processed, Packaged and Prepared Foods. 81 Fed. Reg. 35363 (June
2, 3536-35367)

Dear Sir or Madam:

The undersigned associations respectfully request the Department of Health and Human Service's Food and Drug Administration (FDA) extend the comment period for the agency's Draft Guidance on Voluntary Sodium Reduction Goals: Target Mean and Recommended Maximum Concentrations for Sodium in Commercially Processed, Packaged, and Prepared Foods to provide 180 days total for comment on each of the issues raised in the Draft Guidance.

We appreciate the opportunity to provide comments on both the short-term and long-term goals. However, additional time is needed to facilitate meaningful review and comment. This additional time will allow the undersigned associations to conduct a thorough review of the proposed targets, in addition to the current research available on sodium, and to provide comment on the food categories, baseline sodium levels, and targets, as well as on the overall approach taken in the Draft Guidance. Given the many regulatory priorities facing the undersigned associations and our members, including the recent publication of two final rules on nutrition labeling, the planned implementation of the Vermont GE labeling law, and many others, we have not yet been able to conduct a sufficient review of the Draft Guidance. Moreover, our review requires not only a technical review of each of the proposed targets, but also coordination within each of our respective member companies' research & development and regulatory teams, and discussions with suppliers

An extended comment period that provides an additional 90 days for the short-term targets and an additional 30 days for the long-term targets, with the combined deadline falling 180 days after publication of the notice of availability regarding the draft guidance, would afford stakeholders a greater ability to provide comprehensive answers to FDA's questions. A consolidated comment period for the short-term and long-term issues would allow us and our respective members to provide more holistic comments on the Draft Guidance.

Thank you for this opportunity and we look forward to participating in this process.

Respectfully submitted,

American Bakers Association
American Frozen Food Institute
Association for Dressings and Sauces
Food Marketing Institute
Grocery Manufacturers Association
Independent Bakers Association
International Dairy Foods Association
National Association of Margarine Manufacturers
National Cattlemen's Beef Association
National Restaurant Association
National Turkey Federation
North American Meat Institute
North American Millers' Association
SNAC International
Wheat Foods Council