



INTERNATIONAL
FOOD INFORMATION
COUNCIL FOUNDATION

September 11, 2019

Dockets Management Staff (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852.
Docket Number FDA-2019-D-0892

Re: Docket No. FDA-2019-D-0892 for “The Use of an Alternate Name for Potassium Chloride in Food Labeling: Draft Guidance for Industry.”

Dear Madam or Sir:

The International Food Information Council (IFIC) Foundation is pleased to respond to the draft guidance for industry entitled “The Use of Alternate Name for Potassium Chloride in Food Labeling.” The IFIC Foundation is a nonprofit organization with a mission to effectively communicate science-based information about health, nutrition, and food safety for the public good. A primary objective of the IFIC Foundation is to understand consumers’ food decision-making process to improve nutrition and food safety communication that is grounded in the latest and most sound scientific evidence.

The IFIC Foundation commissions and conducts unique consumer research that can help a diverse set of stakeholders educate consumers around sound science, healthy lifestyles and habits. One area ripe for further exploration includes strategies to help reduce the consumption of sodium which remains too high for most Americans. Use of potassium chloride as a partial replacement for sodium chloride is a promising technique to help reduce sodium consumption. Central to this shift, however, is how consumers understand - and their attitudes toward - potassium chloride.

The Food and Drug Administration (FDA) has proposed using the term “potassium chloride salt” rather than “potassium salt” as an additional common or usual name for potassium chloride. To gather relevant consumer insights in response to this proposed labeling

nomenclature, the IFIC Foundation developed a 1,000 person, online, nationally representative consumer research study in June 2019 entitled “Familiarity, Perceptions and Attitudes Around the Use of Alternate Names for Potassium Chloride in Food Labeling.” The study was designed to assess consumer perceptions of potassium chloride as well as alternative terms that may appear in an ingredient list. Specifically, the research findings can help inform FDA’s consumer data request from stakeholders on alternate names for potassium chloride salt that would better promote consumer acceptance of potassium chloride as an ingredient in foods.

The comments that follow outline the results of this study, which is published on the IFIC Foundation website here: <https://foodinsight.org/kcl-research/>.

Key Findings

Consumers are concerned about the word “chloride.”

Generally, the findings underscore consumer concern with the word “chloride.” Additional data points underscoring this sentiment are noted below.

The survey found that names of ingredients that contain *both* potassium and chloride are perceived as least safe and least tasty. Specifically, the greatest percentage of consumers ranked potassium chloride as the least safe, followed by potassium chloride salt (47% and 38%, respectively). Only 17% thought potassium salt was the least safe. At the same time, 28% thought potassium salt was the most safe, above both potassium chloride salt (26%) and potassium chloride (26%).

Most Safe (% ranked as most safe)	Least Safe (% ranked as least safe)
Salt (71%)	Potassium Chloride (47%)
Sodium (52%)	Potassium Chloride Salt (38%)
Potassium Salt (28%)	Sodium (33%)
Potassium Chloride Salt (26%)	Sodium Chloride (32%)
Potassium Chloride (26%)	Salt (20%)
Sodium Chloride (21%)	Potassium Salt (17%)

When it comes to what sounds the most appealing to eat, of the terms that contain the word potassium, our survey reports that potassium salt reigns supreme. While salt and sodium are perceived as the most tasty ingredient, potassium salt ranks third. In terms of what ingredient is perceived as the least tasty, the greatest percentage of consumers identify potassium chloride and potassium chloride salt (54% and 38%, respectively). Only 17% believe that potassium salt is the least tasty.

Most Tasty (% ranked as most tasty)	Least Tasty (% ranked as least tasty)
Salt (79%)	Potassium Chloride (54%)
Sodium (55%)	Potassium Chloride Salt (38%)

Potassium Salt (24%)	Sodium Chloride (35%)
Potassium Chloride Salt (22%)	Sodium (29%)
Sodium Chloride (22%)	Potassium Salt (17%)
Potassium Chloride (21%)	Salt (15%)

When assessing perceived healthfulness, more than 4 in 10 (42%) said that potassium chloride was the least healthy; 34% said that potassium chloride salt was the least healthy, whereas only 18% said potassium salt. When it came to what was ranked as the most healthy, 31% of consumers said potassium chloride salt and potassium chloride, and 28% said potassium salt. These percentage differences are small and should be viewed in context of the larger percentage differences when seen with the perceived “least healthy” terms.

Most Healthy (% ranked as most healthy)	Least Healthy (% ranked as least healthy)
Salt (61%)	Potassium Chloride (42%)
Sodium (48%)	Sodium (37%)
Potassium Chloride Salt (31%)	Potassium Chloride Salt (34%)
Potassium Chloride (31%)	Sodium Chloride (31%)
Potassium Salt (28%)	Salt (27%)
Sodium Chloride (20%)	Potassium Salt (18%)

In sum, when assessing which terms are perceived to be less safe, tasty and healthy, both potassium chloride and potassium chloride salt were perceived as less safe, less tasty and less healthy compared to potassium salt.

Lack of familiarity with terms containing the word potassium.

When it comes to consumer understanding of potassium chloride and potassium chloride salt, over half said they were unfamiliar with either term (58%). Roughly one-third (32%) said they had heard of potassium salt as a food ingredient and less than 1 in 4 (23%) said they had heard of potassium chloride salt as a food ingredient.

Summary

Based on these survey findings, the IFIC Foundation encourages FDA to consider allowance of the term “potassium salt” as an alternative to “potassium chloride.” Given consumers’ more negative associations with the word “chloride” when used alongside “potassium,” our data suggests that there may be merit to concerns that using the term “potassium chloride salt” could unintentionally dissuade consumers from consuming products containing salt substitutes. Additionally, given the low levels of familiarity of foods containing the word “potassium” across the board, sodium reduction initiatives should include appropriate educational components. Such programs to inform consumers about ingredients in food and their labeling terminology will directly complement and support FDA’s Nutrition Innovation Strategy and goals toward modernizing ingredient labels. IFIC Foundation welcomes any opportunity to assist FDA and

other stakeholders in meeting its sodium reduction and public health goals by providing outreach and targeted education to consumers. We thank the agency for the opportunity to comment on this important proposed labeling initiative.

Sincerely,

Joseph Clayton
Chief Executive Officer, IFIC Foundation