



## National Milk Producers Federation

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703.243.6111 • www.nmpf.org

*"Connecting Cows, Cooperatives, Capitol Hill, and Consumers"*

Agri-Mark, Inc.  
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Associated Milk Producers, Inc.  
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Cooperative Milk Producers Assn.  
Dairy Farmers of America, Inc.  
Dairymen's Marketing Cooperative, Inc.  
Dairylea Cooperative Inc.  
Ellsworth Cooperative Creamery  
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First District Association  
Foremost Farms USA  
Just Jersey Cooperative, Inc.  
Land O'Lakes, Inc.  
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Prairie Farms Dairy, Inc.  
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Select Milk Producers, Inc.  
Southeast Milk, Inc.  
Swiss Valley Farms, Co.  
Tillamook County Creamery Assn.  
United Dairymen of Arizona  
Upstate Niagara Cooperative, Inc.  
Zia Milk Producers

Katharine Haxall, MPH  
Cardiovascular Disease Prevention and Control Program  
NYC Department of Health and Mental Hygiene  
2 Lafayette St. 14th Floor  
New York, NY 10007

October 28, 2009

Dear Ms. Haxall:

The National Milk Producers Federation wishes to respond to the September 17, 2009 "Dairy Products and Substitutes" webinar presented as part of the New York City Department of Health and Mental Hygiene national sodium reduction initiative. Specifically, our comments relate to the discussion of frozen and refrigerated pizza.

As noted in the our letter to you of September 29, 2009, the National Milk Producers Federation, based in Arlington, VA, develops and carries out policies that advance the well being of dairy producers and the cooperatives they own. NMPF's 31 member cooperatives produce the majority of the U.S. milk supply, making NMPF the national policy voice of more than 40,000 dairy producers.

We do not understand the rationale behind the recommendation for a 30% sodium reduction in pizza, particularly without further clarification about targets for component ingredients in pizza. The stated target reduction for natural cheese as noted in your July 23 webinar was 15% by 2014. The call for an even greater percentage sodium reduction in cheese pizza is puzzling to us, unless percentage reductions much greater than 30% are assumed for other pizza constituents.

Our second comment relates to what appears to be a mistake in the RACC of 195 g, listed for cheese pizza at your webinar. We believe that this number is in error. The RACC for pizza is listed in 21 CFR 101.12 as 140 g.

**Jerry Kozak, President/Chief Executive Officer**

**Randy Mooney, Chairman**

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In our response of September 29, we noted the technical challenges associated with a 15% reduction in cheese in terms of taste, functional and safety attributes. Such challenges are even more pronounced in lower fat cheese varieties. To reiterate the primary points made in our September 29 letter:

- Sodium is important in terms of safety, functionality and quality of cheese. Salt helps control the fermentation process, and it maintains characteristics such as flavor, texture and shelf life. It helps minimize spoilage and helps prevent the growth of pathogenic organisms.
- These roles are more pronounced as related to the production of lower fat cheeses. In response to public health recommendations, the industry has placed a high priority on work to increase the availability of good tasting, lower fat cheeses.
- Consumer acceptance of low sodium cheeses currently available has not been promising. This is of particular concern from a nutritional perspective given that cheese is a significant source of essential nutrients in the diets of growing children and teens. For example, a single serving of Cheddar cheese provides nearly one-fourth (23%) of the recommended calcium intake of 1300 mg/day for 9-18 year-olds.

Rather than a single nutrient focus, we believe that a broader approach which addresses lifestyle, diet and exercise in a broader context, such as that demonstrated in the DASH clinical trials, offers the greatest potential for public health benefit. We appreciate the opportunity to comment on these proposals, and we remain committed to providing dairy products that are healthy, nutritious and good tasting.

Sincerely,

A handwritten signature in purple ink that reads "Jamie S. Jonker". The signature is written in a cursive style with a large initial "J".

Jamie S. Jonker, Ph.D.  
Vice President, Scientific and Regulatory Affairs