

Sodium Warning Label: Proposed Amendment of Article 81 Notice of Intention



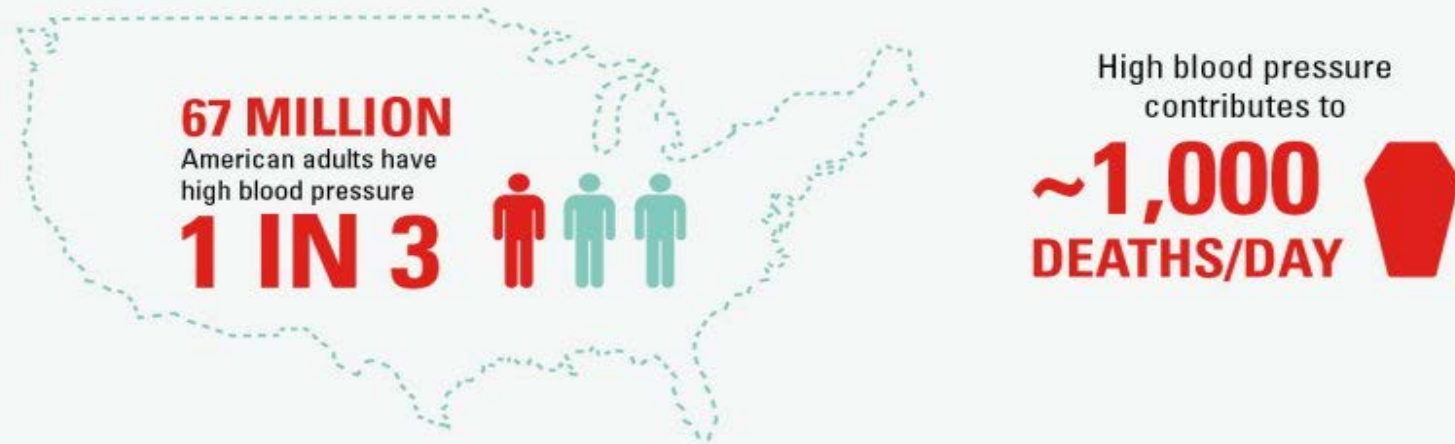
Sonia Angell MD, MPH – Deputy Commissioner
Division of Prevention and Primary Care

June 10, 2015

Heart Disease is a Leading Killer Nationally and in NYC

Nationally:

◀ HIGH BLOOD PRESSURE BASICS ▶



Centers for Disease Control and Prevention

In NYC:

- 1 in 3 deaths are due to **heart disease**¹
- 36% of Black adults have been told by a health professional that they have **high blood pressure**, nearly 50% more than Whites (36.1% vs. 24.8%)²

Heart Disease & Stroke Risk Factors: High Dietary Sodium

- Excess sodium intake is dangerous
 - Leads to high BP³
 - Interferes with proper BP control⁴
 - Increases risk of heart disease and stroke⁴

Warnings about Sources of Excess Sodium Can Help New Yorkers


- Poor awareness of sodium recommendations and major sources of dietary sodium
 - > 80% of adults in NYC consume more sodium daily than the recommended limit⁵
 - Black New Yorkers consume more sodium daily than White New Yorkers⁵
- Too few consumers understand that high sodium intake is a serious health hazard⁶
 - Limited awareness of link between sodium and heart disease/stroke⁷

Informed Decisions: Information New Yorkers Deserve to Have

- Consumers lack important information about risks
 - Some menu items contain more sodium than a person should consume in an entire day
- Variability of sodium content⁸
 - Difficult for consumers to make reliably healthy choices

<u>Chain</u>	<u>Product</u>	<u>Sodium Content</u>
Company A	Smokehouse Turkey Panini	2590 mg
Company A	Roasted Turkey & Avocado BLT Sandwich	960 mg

Proposed Amendment to Article 81 of the Health Code: Sodium Warning Labels

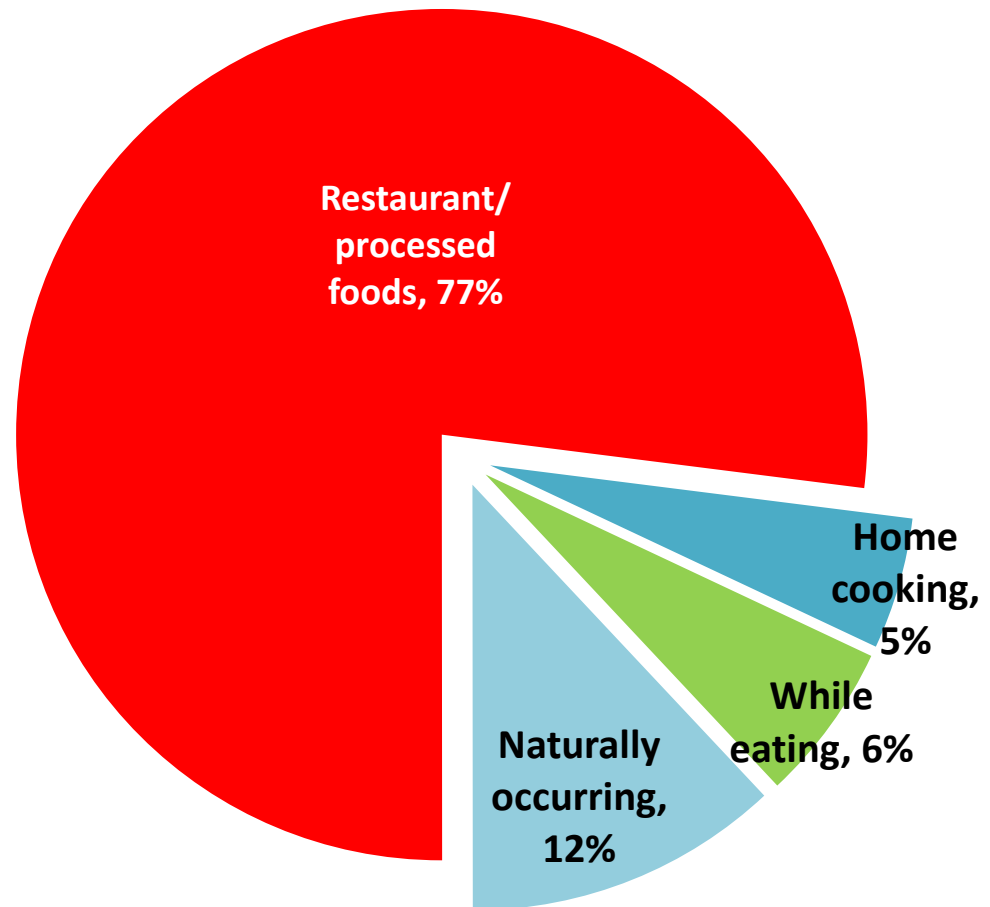
- Identify high sodium items
 - Icon on menus/menu boards identifies items containing $\geq 2,300$ mg of sodium
- Warning statement at point of purchase
 - Warning:  indicates that the sodium (salt) content of this item is higher than the total daily recommended limit (2,300 mg). High sodium intake can increase blood pressure and risk of heart disease and stroke.
- Affects chain food service establishments (≥ 15 locations nationwide)
 - 1/3 of all restaurant traffic in NYC¹⁰



Why Restaurants?

Sources of Sodium

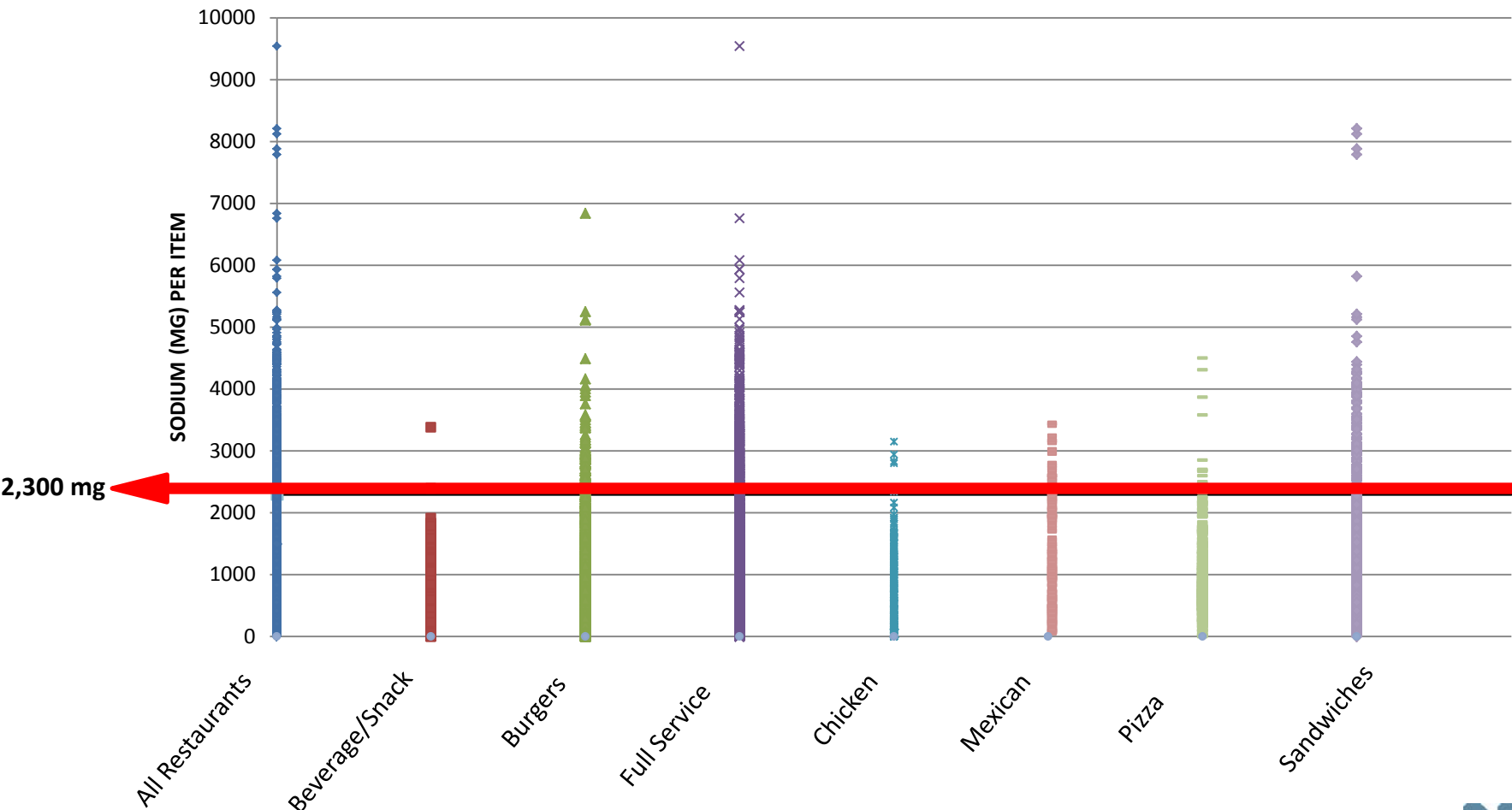
- Restaurant/processed food makes up majority of dietary sodium intake⁹
- Restaurant food is more **sodium dense** than food prepared at home¹⁰



Why Restaurants?

High Sodium Items in NYC Chain Restaurants¹¹

SODIUM PER ITEM IN 2014, BY RESTAURANT TYPE IN NYC



Why Warning Labels?

- Evidence suggests that health warnings
 ↑ knowledge and can ↓ purchase and
 consumption of certain products¹²
- Labels facilitate education
 - Can inform customers of the risks of consuming certain products
 - More than 1 million New Yorkers see calorie labels daily in restaurants¹³
- Consumers find labels helpful
 - Nearly 80% of New Yorkers find calorie labels “useful”¹⁴

Why 2,300 mg?

- Leading scientific bodies recommend that no one's daily sodium intake exceed 2,300 mg
 - Institute of Medicine, US Department of Health and Human Services, USDA^{3,4}
- Warnings on items that contain more sodium than a person should consume in an entire day
- Icon is simple and warns of risks




Authority of Board of Health

- Federal labeling laws allow localities to require warnings about dangerous foods
 - Section 6(c) of Public Law 101-535
- Warnings and instructions are valid exercises of this Board's authority
 - NYSCHCC v. Board of Health, 23 NY3d 681, 698-699 (2014)

Implementation and Enforcement

- Minimal compliance burden
 - Information already exists per federal requirement to provide complete nutrition information upon request
 - Menu items in chain restaurants are standardized
- Regulation would take effect **December 1, 2015** to coincide with the other menu/menu board changes required by calorie labeling amendments
- Inspection for guidance and compliance incorporated into the regular restaurant inspections
- Violations would incur \$200 fine; would not impact letter grade or inspection frequency

Proposed Amendment to Article 81 of the Health Code: Sodium Warning Labels

- Identify high sodium items
 - Icon on menu/menu boards identifies items containing $\geq 2,300$ mg of sodium
- Warning Statement at point of purchase
 - Warning:  indicates that the sodium (salt) content in this item is higher than the total daily recommended limit (2,300 mg). High sodium intake can increase blood pressure and risk of heart disease and stroke.
- Affects chain restaurants (≥ 15 locations nationwide)
 - 1/3 of all restaurant traffic in NYC¹⁵



References

1. Zimmerman R, Li W, Lee E, Lasner-Frater L, Van Wye G, Kelley D, Kennedy J, Maduro G, Sun Y. Summary of Vital Statistics, 2013: Mortality. New York, NY: New York City Department of Health and Mental Hygiene, Office of Vital Statistics, 2015.
2. New York City Department of Health and Mental Hygiene. Epiquery: NYC Interactive Health Data System - Community Health Survey 2013. Viewed June 9, 2015. <http://nyc.gov/health/epiquery>
3. Dietary Guidelines for Americans, 2010. 7th ed. Washington, DC: US Department of Agriculture and US Department of Health and Human Services; 2010.
4. IOM (Institute of Medicine). Sodium Intake in populations: assessment of evidence. Washington, DC: The National Academies Press; 2013.
5. Angell SY, Yi S, Eisenhower D, Kerker BD, Curtis CJ, Bartley K, Silver LD, Farley TA. Sodium intake in a cross-sectional, representative sample of New York City adults. *Am J Public Health* 2014;104(12):2409-16.
6. Center for Science in the Public Interest. Salt: The forgotten killer and the FDA's failure to protect the public's health. 2005. Available at: <http://cspinet.org/salt/saltreport.pdf>. Last accessed on April 27, 2015.
7. Sarmugan R, Worsley A. Current levels of salt knowledge: a review of the literature. *Nutrients*. 2014;6:5534-559.
8. Center for Science in the Public Interest. Salt assault: brand-name comparisons of processed foods. 2013. Available at: <http://cspinet.org/salt/Salt-Assault-3rd-Edition.pdf>. Last accessed on April 27, 2015.
9. Mattes RD, Donnelly D. Relative contributions of dietary sodium sources. *Journal of the American College of Nutrition*. 1991;10(4):383-393.
10. Biing-Hwan L, Guthrie J. Nutritional quality of food prepared at home and away from home, 1977-2008, EIB-105, U.S. Department of Agriculture, Economic Research Service, December 2012.
11. MenuStat.org. Internal Analysis, 2015.
12. Hammond D. Health Warning messages on tobacco products: a review. *Tobacco Control*. 2011;20: 327-337.
13. Dumanovsky T, Huang CY, Bassett MT, Silver LD. Consumer awareness of fast-food calorie information in New York City after implementation of a menu labeling regulation. *Am J Public Health* 2010;100(12):2520-25.
14. Quinnipiac University Poll . October 20, 2011. Available at: <http://www.quinnipiac.edu/news-and-events/quinnipiac-university-poll/new-york-city/release-detail?ReleaseID=1664>. Last accessed on June 1, 2015.
15. The NPD Group / CREST (marketing research data).