CENTER FOR Science IN THE Public Interest
The nonprofit publisher of Nutrition Action Healthletter

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Division of Dockets Management
Food and Drug Administration
Department of Health and Human Services
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Comment on Draft Guidance Regarding Use of an Alternative Name for Potassium Chloride in Food Labeling (Docket No. FDA-2019-D-0892)

Introduction

The Center for Science in the Public Interest (CSPI) respectfully submits the following comments on the Food and Drug Administration's (FDA's) Draft Guidance for Industry Regarding the Use of an Alternative Name for Potassium Chloride in Food Labeling.

CSPI is a non-profit consumer education and advocacy organization that has worked since 1971 to improve the public's health through better nutrition and safer food. CSPI provides nutrition and food safety information to consumers and has long advocated for legislation, regulation, and judicial rulings to ensure that food labels and advertising are clear and transparent, and that they convey useful and relevant public health information. The organization does not accept government or corporate grants and is supported primarily by the half a million subscribers to its Nutrition Action Healthletter.

CSPI supports the declaration of the name "potassium salt" in the ingredient statement as an alternative to the name "potassium chloride," for the following reasons:

- "Potassium salt" is recognized as a common or usual name for potassium chloride to at least the same degree as "potassium chloride salt";
- Allowing "potassium salt" is likely to increase potassium chloride and decrease sodium chloride in the food supply, resulting in public health benefits; and
- Consumers are not likely to confuse "potassium salt" with sodium chloride or other potassium-containing salts.

We believe the term "potassium salt" will be more effective than "potassium chloride salt" at promoting consumer understanding, facilitating sodium reductions in processed foods, and improving public health. We therefore urge the FDA to amend the draft guidance to permit manufacturers to use the name "potassium salt" as an alternative name for "potassium chloride."

CSPI takes no position as to whether the FDA should also permit the term "potassium chloride salt" as an alternative name for potassium chloride.

I. Background

Potassium chloride (KCl) was affirmed by the FDA as a Generally Recognized as Safe (GRAS) food ingredient in 1983.[1] Under this GRAS designation, it may be used as a flavor enhancer, flavoring agent, nutrient supplement, pH control agent, and stabilizer or thickener. Potassium chloride is commonly used as a partial substitute for sodium chloride in foods or for table salt, due to its similar taste and functionality.

Per section 403(i)(2) of the Federal Food, Drug, and Cosmetic (FD&C) Act, the label of a food fabricated from two or more ingredients must bear the common or usual name of each such ingredient.[2] Since FDA regulations do not specify a common or usual name for potassium chloride, food manufacturers refer to this ingredient using its chemical name in the ingredient list. In contrast, FDA regulations do designate "salt" as a common or usual name for sodium chloride, allowing food manufacturers to include this non-chemical name in the ingredient list.[3]

In June 2016, NuTek Food Science, LLC (NuTek) filed a citizen petition asking the FDA to recognize "potassium salt" as an additional common or usual name for "potassium chloride."[4][5] NuTek noted that consumers have a negative perception of potassium chloride based on its chemical-sounding name, and posited that "[a]llowing entities to voluntarily label potassium chloride as 'potassium salt' encourages entities to make healthier food while demystifying potassium for consumers." Thirty-two companies and individuals from the food industry, academia, and public health fields commented on the petition. Thirty comments expressed support for the petition, including CSPI, Nestle, Unilever, Campbell Soup Company, Walmart, and SNAC International; two comments in opposition were from an anonymous consumer and the now-defunct Salt Institute.

On May 14, 2019, the FDA issued a Draft Guidance for Industry Regarding Use of an Alternative Name for Potassium Chloride in Food Labeling.[6] This guidance considers the petition filed by NuTek, but proposes a different term—"potassium chloride salt"—instead of "potassium salt" as a common or usual name for "potassium chloride." The agency recognized "potassium chloride" as the common or usual name for the ingredient based on "longstanding common usage," but offered to exercise enforcement discretion and permit the term "potassium chloride salt" to be used on ingredient labels as well.

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1 21 C.F.R § 184.1622.
2 21 U.S.C. § 343(i)(2); 21 CFR § 101.4.
3 21 C.F.R. 101.22(h)(4).
4 FDA-2016-P-1826. Citizen Petition from NuTek Food Science LLC. June 28, 2016.
5 Nutek's petition was since withdrawn, but FDA's subsequent draft guidance remains active.
6 84 Fed Reg. 22749. The Use of an Alternate Name for Potassium Chloride in Food Labeling; Draft Guidance for Industry; Availability.

Explaining its proposal, the agency asserted that "[a]ddition of the term 'salt' to the common or usual name 'potassium chloride' may help consumers to better understand the similarities between potassium chloride and sodium chloride with respect to taste and function." The agency also indicated that "[b]ecause 'potassium chloride salt' includes the entire common or usual name of the ingredient, the FDA considers it unlikely that consumers would confuse it with sodium chloride or other potassium containing salts."

II. The FDA should allow "potassium salt" as a common or usual name for potassium chloride.

A. "Potassium salt" is recognized as a common or usual name for potassium chloride to at least the same degree as "potassium chloride salt"

The FDA's proposal to exercise enforcement discretion and allow the use of "potassium chloride salt" and not "potassium salt" as a common or usual name for potassium chloride is unusual, as it invents a new term that is no more common than the term proposed and preferred by industry and consumer advocates. In fact, the name "potassium salt" is better aligned with consumer expectations than the name "potassium chloride salt." In a nationally representative survey of 1,000 consumers conducted in June 2019, commissioned by the International Food Information Council (IFIC), 32% of consumers stated that they had heard of "potassium salt" being used as a food ingredient (margin of error = +/-3%) (see Appendix). Only 23% reported that they had heard of "potassium chloride salt" and 58% reported having heard of neither.

Moreover, while the use of the term "potassium salt" may not yet be widely used, it has at times been used interchangeably with the term "potassium chloride" by food scientists. For example, a 1981 patent for "Salt Substitutes Having Reduced Bitterness" specifically references "potassium chloride"—the only potassium salt mentioned in the patent—when stating, "[t]he reason for bitterness perception with potassium salt and not with sodium salt is not generally understood."[7] Another patent for "Low Sodium Edible Salt Composition and Process for Its Preparation" states, "[i]t has long been proposed to use in food low sodium edible salts, in which potassium chloride replaces some of the sodium chloride. However, potassium salt has a different, bitter taste."[8] A third patent for "Taste-Improving Agent for Potassium Salt or Potassium Salt-Containing Food or Drink" refers to potassium chloride as "potassium salt" throughout.[9]

As potassium chloride is used more widely as a salt substitute in food, more consumers will increasingly understand the ingredient as a substitute for table salt. Should the FDA permit the term "potassium salt" in place of potassium chloride on ingredient labels, the action would

7 Shackelford, JR. Salt Substitutes Having Reduced Bitterness. Patent No. 4,297,375. October 27, 1981.
8 Zolotov S, et al. Low Sodium Edible Salt Composition and Process for Its Preparation. Patent No. 5,853,792. December 29, 1998.
9 Miyazawa T, et al. Taste-Improving Agent for Potassium Salt or Potassium Salt-Containing Food or Drink. Pub. No. US 2011/0104361 A1. May 5, 2011.

generate publicity, accelerate consumer awareness of this term, and increase its acceptance as the common or usual name of potassium chloride. Already, in the wake of NuTek's petition and FDA's draft guidance on the use of alternate names for potassium chloride, several food companies,[10] health and consumer advocacy groups,[11] and news organizations[12] have begun using the term "potassium salt."

Assuming the agency exercises enforcement discretion to allow for the use of a name that is not the common or usual name for potassium chloride, it should allow for the use of "potassium salt.".

B. Allowing "potassium salt" is likely to increase potassium chloride and decrease sodium chloride in the food supply

In its draft guidance, the agency indicates that "the substitution of potassium chloride for sodium chloride is advantageous due to the over-consumption of sodium and under-consumption of potassium at the population level compared to federal recommendations." The agency states that allowing use of the term "potassium chloride salt" "may result in manufacturers using potassium chloride as a substitute ingredient for sodium chloride and lead to increased consumer understanding of the use of potassium chloride as a replacement for sodium chloride (*i.e.*, salt)."

We agree with the FDA that substitution of potassium chloride would be advantageous for public health, but disagree that allowing "potassium chloride salt" as the sole alternative name for potassium chloride on ingredient labels would result in increased consumer acceptance of potassium chloride as an ingredient or increased use of potassium chloride as a substitute ingredient for sodium chloride by manufacturers.

1. Increasing potassium chloride and decreasing sodium chloride in the food supply will benefit public health

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[10] Unilever. More taste, less salt. n.d. https://www.unilever.com/sustainable-living/improving-health-and-well-being/improving-nutrition/responsibly-delicious/more-taste-less-salt/#244-416681. Accessed August 13, 2019.
Maggi. Maggi accompagne la cuisine de tous les jours depuis 130 ans. n.d. https://www.maggi.fr/les-engagements-maggi/la-demarche-simplement-bon. Accessed August 13, 2019.
Campbell's. Potassium salt. n.d. https://www.whatsinmyfood.com/?s=Potassium+salt. Accessed August 13, 2019.
[11] Harvard T.H. Chan School of public Health. Take Action: How to Reduce Your Sodium Intake. n.d. https://www.hsph.harvard.edu/nutritionsource/salt-and-sodium/take-action-on-salt/. Accessed August 13, 2019.
World Action on Salt & Health. Other salts and salt substitutes. n.d. http://www.worldactiononsalt.com/less/how/other/. Accessed August 13, 2019.
Hypertension Canada. Organizational Position Statement on Dietary Potassium. January 2019. https://hypertension.ca/wp-content/uploads/2019/01/Position-Statement-on-Dietary-Potassium-Hypertension-Canada-January-2019.pdf. Accessed August 13, 2019.
[12] Tan M. Salt: China's deadly food habit. *The Conversation.* July 15, 2019. https://theconversation.com/salt-chinas-deadly-food-habit-120201. August 13, 2019. Berry D. Reducing sodium, retaining taste. *Food Business News.* January 5, 2017. https://www.foodbusinessnews.net/articles/8837-reducing-sodium-retaining-taste?page=3. Accessed August 13, 2019.

Scientists have studied the health benefits and impacts of increasing potassium chloride and decreasing sodium chloride in the food supply. One modeling study estimated that if Americans reduce their sodium intake to the recommended 2,300 mg per day, the result would be 11 million fewer cases of prevalent hypertension and $18 billion saved in health care costs each year.[13] A systematic review of studies on potassium intake and health found that higher potassium intake was associated with reduced blood pressure in people with hypertension and a 24 percent lower risk of stroke.[14]

While an increase in potassium in the food supply may pose a risk to a small percent of adults with chronic kidney disease or who are not able to excrete excess, a review by the United Kingdom Department of Health's Scientific Committee on Medical Aspects of Nutrition and Committee on Toxicology found that if 15 to 25 percent of sodium chloride in food was substituted with potassium chloride, the benefits (reduction in hypertension and number of strokes) would outweigh the potential risks (increase in cases of hyperkalemia and resultant arrhythmia or heart attack).[15]

Unfortunately, as stated in a report published by the National Academy of Sciences in 2010, "[a]ctivities to reduce sodium intake of the U.S. population have been ongoing for more than 40 years, but they have not succeeded."[16] To gain further ground, all potential avenues for further sodium reduction should be explored. The use of potassium chloride as a substitute for sodium chloride therefore presents a promising opportunity for decreasing sodium chloride in the food supply to benefit public health.

2. Allowing "potassium salt" is likely to increase acceptance of potassium chloride by consumers and manufacturers

Many consumers are unlikely to accept foods with "potassium chloride salt" listed as an ingredient. As stated in NuTek's petition, consumers lack familiarity with the term potassium chloride and associate it with chlorine and other chemicals because of the word "chloride." This may lead consumers who avoid non-natural ingredients in their food to favor products containing "salt," an ingredient with a more familiar and natural sounding name, over potassium chloride, a healthier alternative ingredient. Since the proposed name "potassium chloride salt" still includes the word "chloride," it would continue to discourage some consumers from avoiding healthier products. In a survey of 312 consumers conducted in May 2019, commissioned by Campbell Soup Company, consumers were asked "[w]hich, if either, ingredient in a food product would

13 Palar K, Sturm R. Potential societal savings from reduced sodium consumption in the U.S. adult population. *Am J Health Promot*. 2009;24:49-57.
14 Aburto NJ, et al. Effect of increased potassium intake on cardiovascular risk factors and disease: systematic review and meta-analyses. *BMJ.* 2013; 346: f1378.
15 Scientific Advisory Committee on Nutrition and Committee on Toxicity. Potassium-based sodium replacers: assessment of the health benefits and risks of using potassium based sodium replacers in food in the UK. 2017.
16 Institute of Medicine. *Strategies to Reduce Sodium Intake in the United States.* 2010. Washington, DC: The National Academies Press.

make you less likely to purchase that product." Allowed to select one answer only, 22% of consumers indicated that "Potassium chloride salt would make me less likely to purchase" a product with that ingredient, while only 2% of consumers stated that "potassium salt would make me less likely to purchase the product."[17] Forty-three percent said "Neither ingredient would discourage me from purchasing a product," and 34% said "Both ingredients would discourage me from purchasing the product."

Low consumer acceptance of the term "potassium chloride salt" is further supported by findings from the 2019 survey commissioned by IFIC. The survey found that that after learning that "potassium salt" can replace table salt in food, 26% of consumers would be 'Very Likely' and 39% would be 'Somewhat Likely' to purchase a food that listed "potassium salt" as an ingredient (see Appendix). In contrast, after learning that "potassium chloride salt" can replace table salt in food, only 18% of consumers would be 'Very Likely' and 39% would be 'Somewhat Likely' to purchase a food that listed "potassium chloride salt" as an ingredient.

Furthermore, when ranking a list of six ingredients (salt, sodium, sodium chloride, potassium chloride, potassium salt, and potassium chloride salt) from safest to least safe, 28% of consumers ranked "potassium salt" among the most safe ingredients and another 55% ranked it as somewhat safe, while 26% ranked "potassium chloride salt" among the most safe ingredients and only 37% ranked it as somewhat safe. When ranking the same ingredients from healthiest to least healthy, 28% of consumers ranked "potassium salt" among the most healthy ingredients and another 53% ranked it as somewhat healthy, while 31% ranked "potassium chloride salt" among the healthiest ingredients and 35% ranked it as somewhat healthy.

The preferences of food manufacturers is also important, as it is manufacturers who will determine whether or not to reformulate products by substituting potassium chloride for sodium chloride. Numerous companies, including Unilever, 7-Eleven, Nestle, Campbell Soup Company, Walmart, and others commented in support of NuTek's 2016 petition. More recently, in 2018, NuTek, Nestle, Unilever, Culinaria Europe, International Association of Plant Bakeries (AIBI), Griffith Foods Europe, Jungbunlauer, and Clitravi issued a joint position paper in support of "potassium salt" or similar/equivalent terms as the most appropriate names to be used for labelling potassium chloride.[18]

Based on these statements by manufacturers and on what is known about consumer preferences, allowing the name "potassium salt" would be more likely to promote the replacement of sodium, increase consumer acceptance of this healthy ingredient, and improve public health than allowing the term "potassium chloride salt."

[17] Docket No. FDA-2019-D-0892. Comment from Campbell Soup Company. July 12, 2019.
18 Culinaria Europe, et al. Joint position paper on potassium chloride used as salt substitute. 2018. https://www.culinaria-europe.eu/download/joint-pp-kcl-final-2018-08-21.pdf%20. Accessed July 17, 2019.

C. Consumers are not likely to confuse 'potassium salt' with 'sodium chloride' or other potassium-containing salts.

The agency's proposal to authorize the use of "potassium chloride salt" rather than "potassium salt" appears primarily driven by a desire to avoid consumer confusion, as its draft guidance states: "[b]ecause 'potassium chloride salt' includes the entire common or usual name of the ingredient, the FDA considers it unlikely that consumers would confuse it with sodium chloride or other potassium-containing salts."

We support the principle that the FDA should only exercise enforcement discretion to permit the use of food ingredient names that comply with the general regulatory principles of ingredient naming, including requirements that the name accurately describe the food and does not lead to confusion with other products. Yet these requirements would be adequately met using the name "potassium salt," making it unnecessary to employ the term "potassium chloride salt" in order to avoid consumer confusion.

FDA regulations require that the names of ingredients may be similar as long as they are not "confusingly similar to the name of any other [ingredient] that is not reasonably encompassed within the same name."[19] The most widely recognized of a class of ingredients may take the name of the entire class, provided distinctions are preserved. For example, the agency allows both "cornstarch" and "starch" to be used as the common or usual name for starch made from corn, while providing that starch from other sources be designated by a non-misleading term indicating the source, such as "potato starch," "wheat starch," or "tapioca starch."[20]

In the present case, the term "potassium salt" would comply with these regulatory principles because it adequately distinguishes potassium chloride from other ingredients, including sodium chloride and other potassium-containing salts. First, "Potassium salt" is readily distinguishable from "salt" by the word "potassium." Second, while several potassium salts are used as food ingredients, the FDA has not been asked to recognize the term "potassium salt" as a common or usual name for these ingredients, which would still be required to bear their own distinctive chemical names, adequately distinguishing them from potassium salt. Thus, potassium salt would be readily distinguishable from cream of tartar (potassium bitartrate), potassium iodide, potassium carbonate, and other salts of potassium the same way starch (cornstarch) is currently distinguished from potato starch and other starches.

The subset of consumers who are familiar with multiple potassium-containing salts are also likely to be familiar with multiple sodium-containing salts. Since sodium chloride is the only sodium salt with the common name "salt," it follows that potassium chloride (the potassium salt most commonly used to replace sodium salt) should be the only potassium salt with the common name "potassium salt."

19 *Id.*
20 CPG Sec. 578.100 Starches – Common or Usual Names. October 1980.

This naming convention is particularly appropriate because, much like sodium chloride is the most widely recognized sodium salt, and cornstarch is the most widely used and recognized starch, potassium chloride is the most widely used and recognized salt of potassium. Consumer recognition of potassium chloride as the primary salt substitute is further amplified by its widespread use as a substitute for table salt in saltshaker-type products like Morton's Salt Substitute, Morton's Lite Salt, NuSalt, NoSalt, LoSalt, and Salt for Life, alone or in conjunction with sodium chloride. The most prevalent ingredient in each of these products is either potassium chloride or sodium chloride.

In summation, the FDA can and should allow for the use of "potassium salt" as an alternative name for "potassium chloride," as the name will be sufficiently distinct from the names of other ingredients to avoid the risk of consumer confusion.

III. Conclusion

The name "potassium salt" would be recognized to at least the same degree as "potassium chloride salt," and would be more effective at improving public health than the FDA's current proposal. Moreover, the name is consistent with the FDA's general principles of ingredient naming in that it accurately describes the ingredient and will not lead to consumer confusion. We therefore encourage the FDA to amend its draft guidance to allow the use of "potassium salt" as a common or usual name for "potassium chloride."

Appendix I

Survey Instrument
National Consumer Poll
Conducted by Lincoln Park Strategies
Commissioned by the International Food Information Council
June 2019

1. Which of the following, if any, have you heard of being used as a food ingredient? Please select all that apply. [ROTATE INGREDIENTS]

Potassium Salt	1
Potassium Chloride Salt	2
Neither	3

2. When it comes to Potassium, do you?

Seek it out in foods you consume	1
Avoid it in foods you consume	2
Neither seek out or avoid it in foods you consume	3
Don't know	4

3. For each ingredient below please mark those descriptions that you agree with for each ingredient. If you do not feel that it describes the ingredient, please leave that box blank. If you are unfamiliar with the ingredient, please check "Not familiar."

	Is safe to eat	Has a good taste	Is healthy	None of these	Not familiar
Potassium Chloride					
Potassium Chloride Salt					
Potassium Salt					
Sodium Chloride					
Salt					
Sodium					

[ROTATE Q4-6]

4. Regardless of how familiar you are with the ingredients below, please rank each ingredient from 1 to 6 in order from **most safe to eat to least safe to eat**. If you feel some ingredients are at the same level, please give them the same number. [ALLOW TIES]

   Potassium Chloride

   Potassium Chloride Salt

   Potassium Salt

   Sodium Chloride

   Salt

   Sodium

5. Regardless of how familiar you are with the ingredients below, please rank each ingredient from 1 to 6 in order from **most tasty to least tasty**. If you feel some ingredients are at the same level, please give them the same number. [ALLOW TIES]

   Potassium Chloride

   Potassium Chloride Salt

   Potassium Salt

   Sodium Chloride

   Salt

   Sodium

6. Regardless of how familiar you are with the ingredients below, please rank each ingredient from 1 to 6 in order from **healthiest to least healthy**. If you feel some ingredients are at the same level, please give them the same number. [ALLOW TIES]

   Potassium Chloride

   Potassium Chloride Salt

   Potassium Salt

   Sodium Chloride

   Salt

   Sodium

7. When it comes to buying food, please indicate your level of agreement with the following statements:

[ROTATE]	Strongly agree	Somewhat agree	Neither agree or disagree	Somewhat disagree	Strongly disagree	Don't know
I seek out ingredients that I recognize and understand	1	2	3	4	5	6
I seek out foods that are beneficial to my overall health	1	2	3	4	5	6
If available, I would seek out foods containing alternative salts that allow for similar taste but lower sodium content	1	2	3	4	5	6

8a. [SPLIT] Potassium Chloride can replace table salt in food to reduce the sodium content of a product. How likely would you be to purchase a food that listed Potassium Chloride in the ingredient list?

Very likely	1
Somewhat likely	2
Somewhat unlikely	3
Not at all likely	4
Don't know	5

8b. [SPLIT] Potassium Chloride Salt can replace table salt in food to reduce the sodium content of a product. How likely would you be to purchase a food that listed Potassium Chloride Salt in the ingredient list?

Very likely	1
Somewhat likely	2
Somewhat unlikely	3
Not at all likely	4
Don't know	5

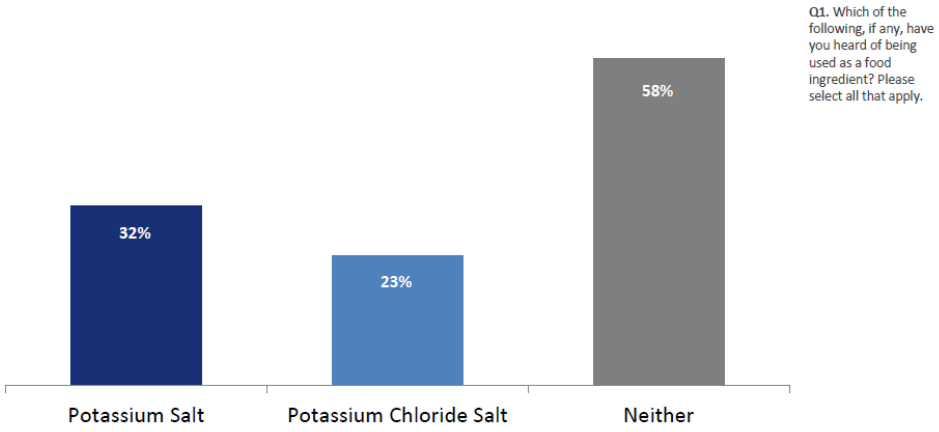
8c. [SPLIT] Potassium Salt can replace table salt in food to reduce the sodium content of a product. How likely would you be to purchase a food that listed Potassium Salt in the ingredient list?

Very likely	1
Somewhat likely	2
Somewhat unlikely	3
Not at all likely	4
Don’t know	5

Appendix II

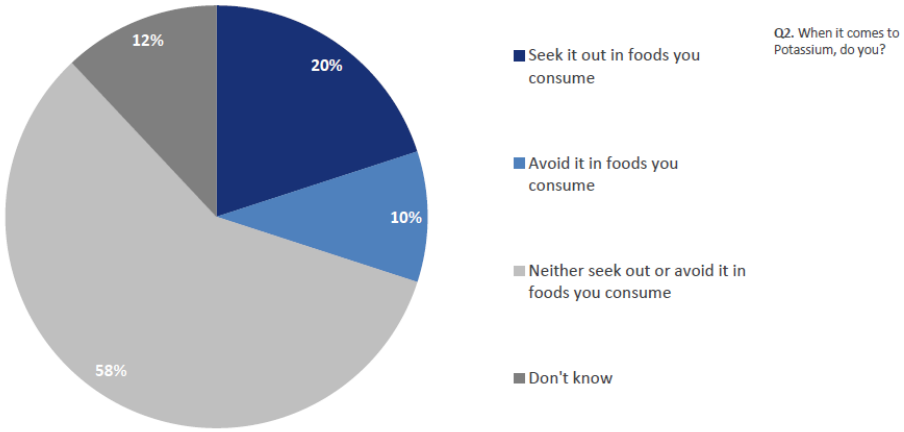
Survey Results
National Consumer Poll
Conducted by Lincoln Park Strategies
Commissioned by the International Food Information Council
June 2019

FAMILIARITY WITH FOOD INGREDIENTS



www.FoodInsight.org

POTASSIUM



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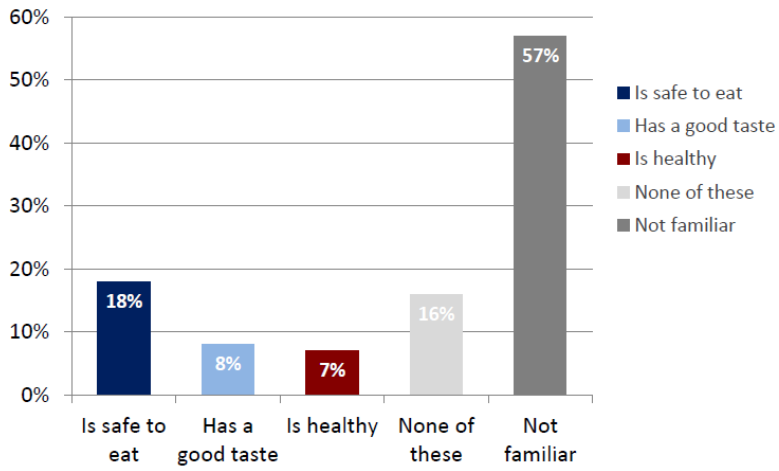
"POTASSIUM CHLORIDE"



Q3. For each ingredient below please mark all those descriptions that you agree with for each ingredient. If you do not feel that it describes the ingredient, please leave that box blank. If you are unfamiliar with the ingredient, please check "Not familiar."

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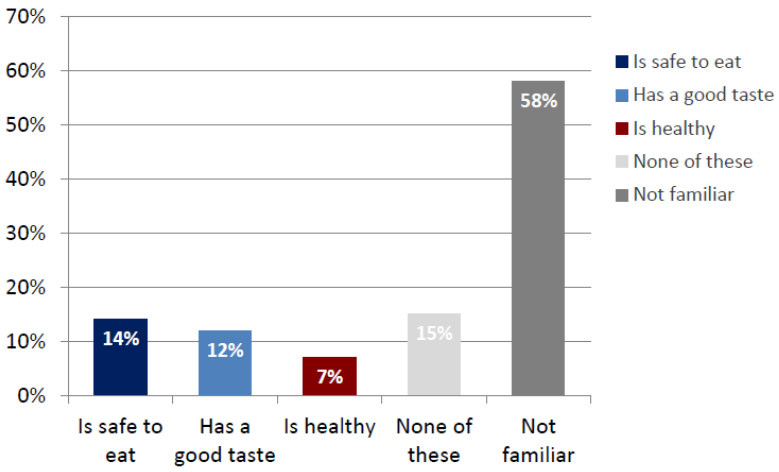
"POTASSIUM CHLORIDE SALT"



Q3. For each ingredient below please mark all those descriptions that you agree with for each ingredient. If you do not feel that it describes the ingredient, please leave that box blank. If you are unfamiliar with the ingredient, please check "Not familiar."

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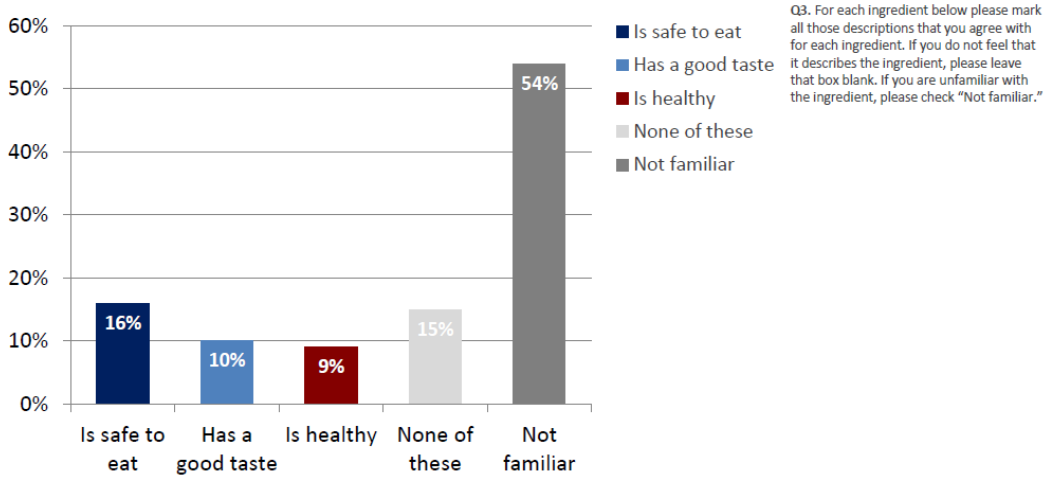
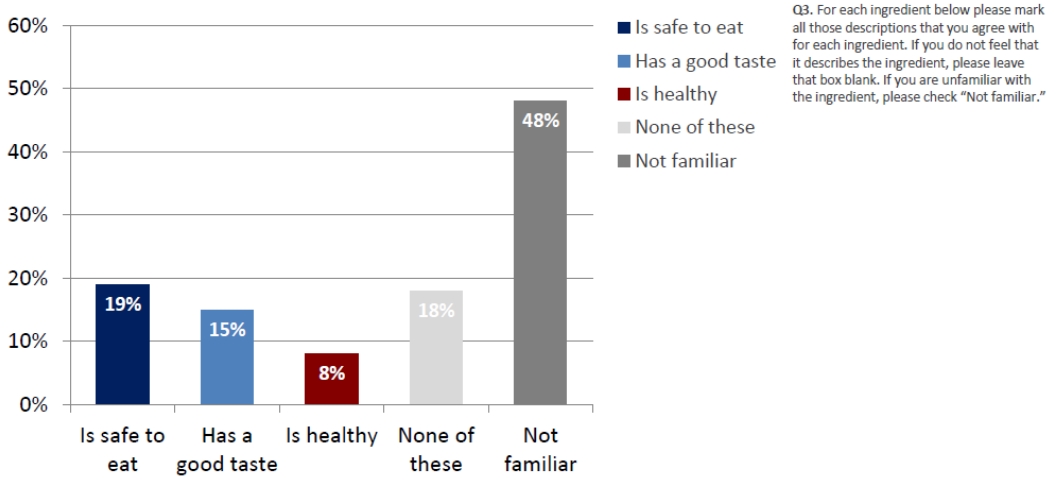
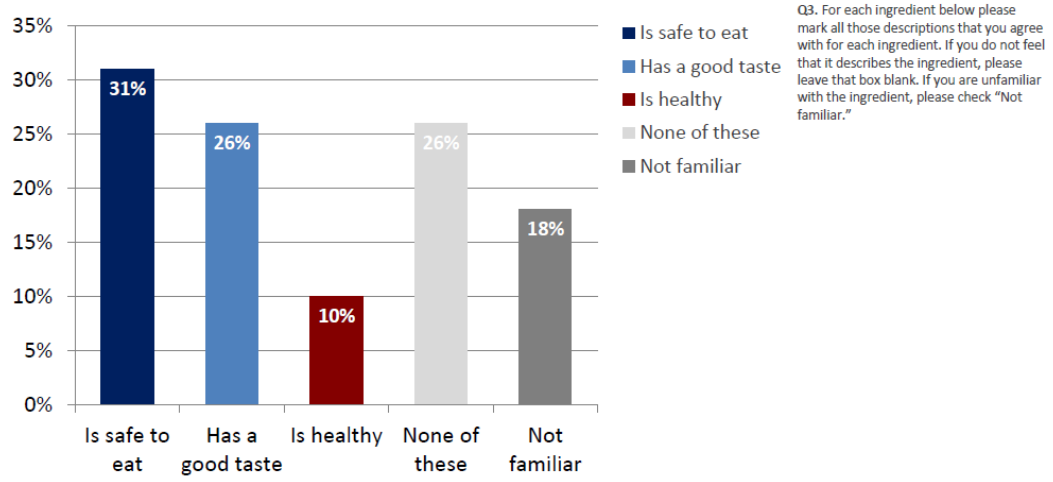
"POTASSIUM SALT"



"SODIUM CHLORIDE"



"SODIUM"



Q3. For each ingredient below please mark all those descriptions that you agree with for each ingredient. If you do not feel that it describes the ingredient, please leave that box blank. If you are unfamiliar with the ingredient, please check "Not familiar."

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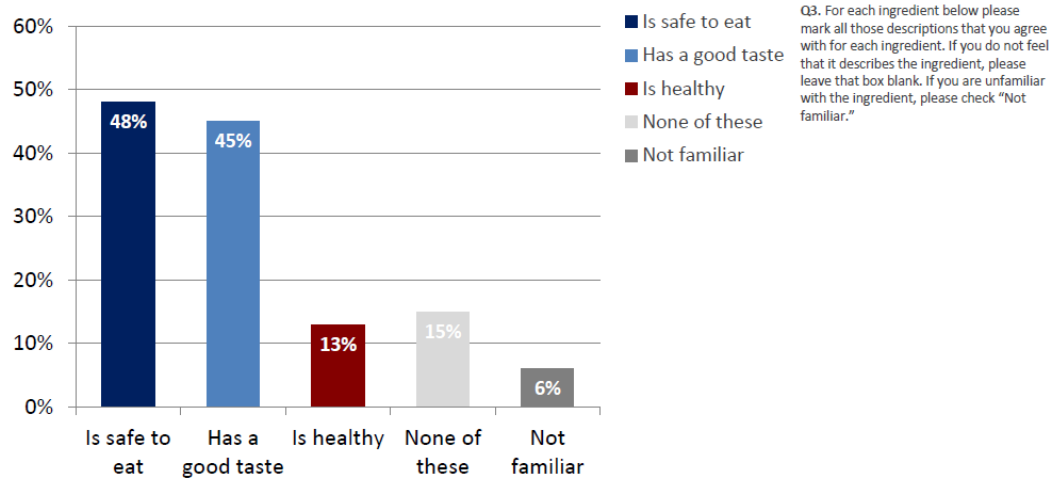
"SALT"



Q3. For each ingredient below please mark all those descriptions that you agree with for each ingredient. If you do not feel that it describes the ingredient, please leave that box blank. If you are unfamiliar with the ingredient, please check "Not familiar."

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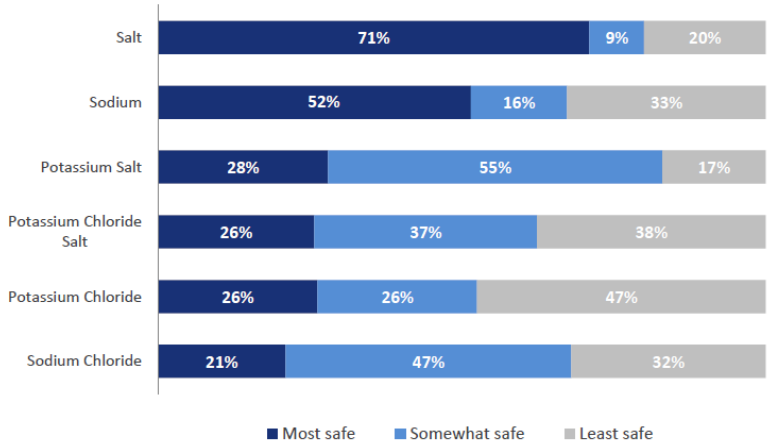
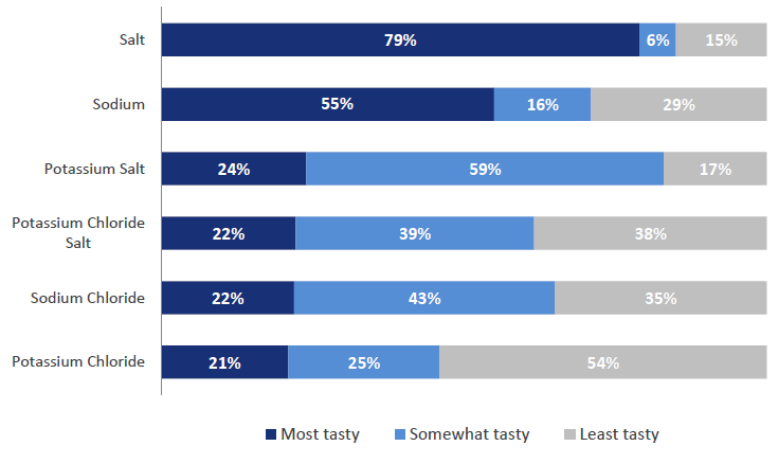
RANKINGS: SAFE TO EAT



Q4. Regardless of how familiar you are with the ingredients below, please rank each ingredient from 1 to 6 in order from most safe to eat to least safe to eat. If you feel some ingredients are at the same level, please give them the same number.

% ranked 1 or 2, 3 or 4, 5 or 6

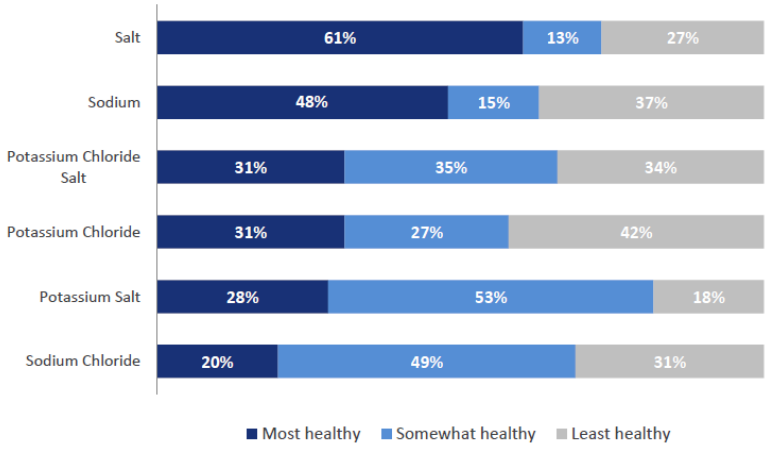
RANKINGS: TASTE



Q5. Regardless of how familiar you are with the ingredients below, please rank each ingredient from 1 to 6 in order from most tasty to least tasty. If you feel some ingredients are at the same level, please give them the same number.

% ranked 1 or 2, 3 or 4, 5 or 6

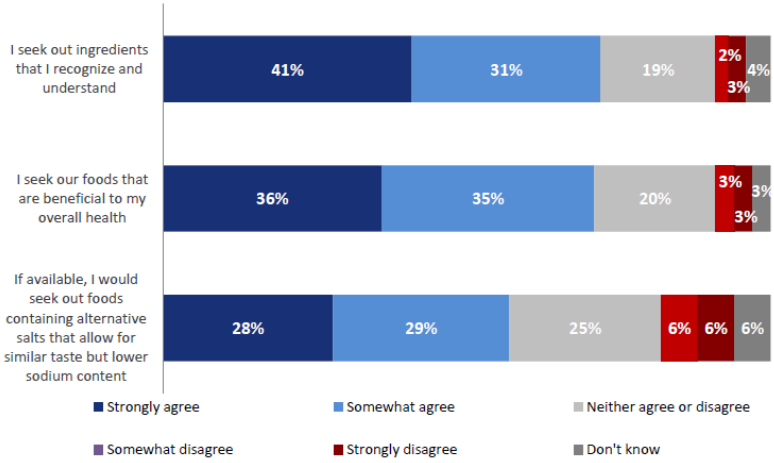
RANKINGS: HEALTH



Q6. Regardless of how familiar you are with the ingredients below, please rank each ingredient from 1 to 6 in order from healthiest to least healthy. If you feel some ingredients are at the same level, please give them the same number.

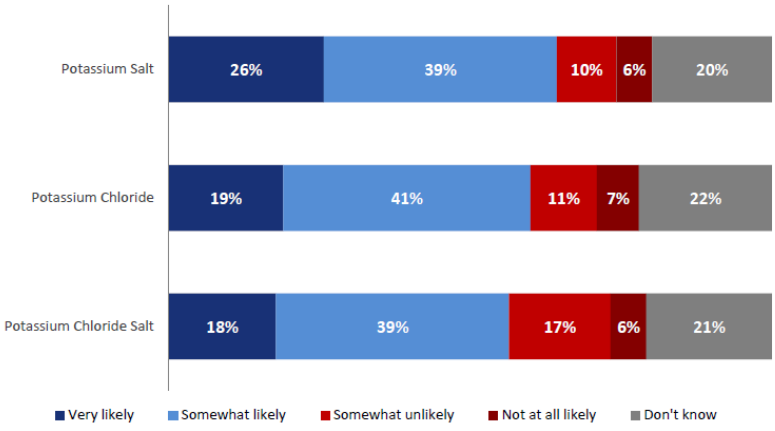
% ranked 1 or 2, 3 or 4, 5 or 6

STATEMENTS



Q7. When it comes to buying food, please indicate your level of agreement with the following statements:

TABLE SALT REPLACEMENTS



Q8. Potassium Chloride/ Potassium Chloride Salt/ Potassium Salt can replace table salt in food to reduce the sodium content of a product. How likely would you be to purchase a food that listed Potassium Chloride/ Potassium Chloride Salt/ Potassium Salt in the ingredient list?

*Note that this was a split sample – survey participants viewed only ONE of these terms.