

30 October 2020

Food Standards Australia New Zealand
Level 3, 154 Featherston Street
Wellington 6011, New Zealand

Added Sugar Stakeholder Consultation – 20/10/2020

The Australian Dental Association Victorian Branch (ADAVB) works to improve the dental health of Victorians and promote the highest standards of professional dental care.

The ADAVB recently participated in a consultation meeting regarding added sugar labelling on packaged food and drinks. We joined this meeting in support of a submission made by the Australian Dental Association (ADA) during the first stakeholder consultation in 2018. We would like to follow up by reinforcing views shared by public health and consumer representative groups involved in this consultation.

Recommendations:

(1) Broadly define added sugars as monosaccharides and disaccharides added to food, ensuring that all added sugars are identified on product labelling

This is an appropriate starting point providing that it does not exclude any forms of sugar identified by the World Health Organization (WHO) as an added sugar. The WHO defines free (added) sugars as “monosaccharides and disaccharides added to foods and beverages by the manufacturer, cook or consumer, and sugars naturally present in honey syrups, fruit juices and fruit juice concentrates.”¹ Any added sugars that are potentially harmful to health should be covered by the added sugar definition.

It is extremely important that added sugar is captured and identified independently to total sugar in products' nutrition information panel (NIP). Given that there are over 40 different names for sugar, consumers are not equipped to translate this type of information provided on the ingredient list, particularly when product packaging or marketing promotes health claims.²

1. World Health Organization WHO. (2015). *Guideline: Sugars intake for adults and children*. Retrieved from www.who.int/nutrition/publications/guidelines/sugars_intake/en/.

2. Choice. (2015). *Sugar, by any other name*. Retrieved from www.choice.com.au/food-and-drink/nutrition/food-labelling/articles/added-sugar-on-food-labels-070815#names.

Quantifying added sugar on the NIP should be done in conjunction with other measures to assist consumers to keep track of how much added sugar they are consuming, and we encourage Food Standards Australia New Zealand (FSANZ) to consider this in further added sugar labelling refinement. Easy to interpret graphics should be included on the packaging of products that are most detrimental to health based on added sugar content and consumption habits. Pictorial images on sugar sweetened beverages such as teaspoons displaying the amount of added sugar can help consumers to interpret added sugar quantity and support better dietary choices.³ This will enable them to make informed decisions and understand the added sugar contribution that these products have to their daily added sugar intake.

Added sugars have been identified by the WHO and within the Australian Dietary Guidelines as harmful to health.^{1,4} High levels of added sugar consumption increase the risk of tooth decay, obesity and development of non-communicable diseases such as cardiovascular disease, type 2 diabetes and some cancers.^{1,4} These conditions have huge individual and economic costs and often don't occur in isolation – they are interrelated and greatly impact on health and wellbeing.

Health risks associated with added sugar consumption, particularly tooth decay, increase when the level of added sugar consumed exceeds 10% of total energy intake.¹ The WHO recommends that added sugar does not exceed 5% of total energy intake for additional health benefits.¹ Food product labelling must support consumers to follow this important public health advice, particularly in the current environment where those with chronic health conditions are more vulnerable to severe illness associated with COVID-19.⁵

(2) All monosaccharide and disaccharide sources added during food manufacture should be considered

All monosaccharides and disaccharides that are extracted from their original source and added to other products during food manufacture should be considered. Intrinsic sugars naturally found in unprocessed or minimally processed items would not be considered added sugars providing that they are not extracted to sweeten other products. Some examples of intrinsic sugars include those present in fresh, unprocessed or minimally processed fruit, vegetables, unflavoured milk and dairy products, cereal grains, nuts and seeds. Specific ingredients are discussed below.

- **Sugars naturally present in milk and dairy products**

Intrinsic sugars in these products would not be defined as added sugars. Intrinsic sugars are not considered to be harmful to general health when consumed in recommended quantities and are part of a healthy diet.¹ Lactose and galactose extracted and isolated from their original source would be considered an added sugar when used as an ingredient in another product.

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3. Billich, N., Blake, M., Backholder, K., Cobcroft, M., Li, V., & Peeters, A. (2018). The effect of sugar-sweetened front-of-pack labels on drink selection, health knowledge and awareness: An online randomized control trial, *Appetite*, 128, 233-241. Retrieved from www.sciencedirect.com/science/article/pii/S0195666318300369.
 4. National Health and Medical Research Council. (2013). *Australian Dietary Guideline*. Retrieved from www.eatforhealth.gov.au/sites/default/files/content/n55_australian_dietary_guidelines.pdf.
 5. Australian Government Department of Health. (2020). *Coronavirus (COVID-19) advice for people with chronic health conditions*. Retrieved from <https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert/advice-for-people-at-risk-of-coronavirus-covid-19/coronavirus-covid-19-advice-for-people-with-chronic-health-conditions>.

- **Sugars naturally present in fruit and vegetables (fresh, diced, cut, pureed, canned, dried, powdered etc.)**

Sugars incorporated within the structure of fresh, intact fruit and vegetables as well as minimally processed fruit and vegetables that are diced or cut (without added sugar) would not be considered added sugar. This extends to intrinsic sugars in cereal grains, nuts and seeds.

Fruit and vegetables that are pureed, concentrated, dried, blended, powdered, moderately or significantly processed in any other way falls into the added sugar category. These types of processing destroy structural integrity by removing fibre, water, vitamins and minerals and retaining the sugar. When these forms of sugar are added to food and drinks on a mass production scale, what is left is often the sugar equivalent of multiple fruits or vegetables with little to no other beneficial nutrients. The sugar is no longer in its natural form and can be consumed in amounts that are detrimental to health without consumers' full awareness. This type of sugar added to food and drinks is defined by the WHO as a free sugar.¹ It is important to note that sugars in these forms are often included in products that are marketed to consumers as healthy.

- **Fruit/ vegetable juice, concentrated fruit/ vegetable juice**

Fruit and vegetables in these forms should be included in the added sugar definition. As described above, the naturally occurring sugar within fruit and vegetables that have been moderately or highly processed can no longer be considered intrinsic once the cellular structure has been disrupted. These processes allow for the sugar of multiple fruits or vegetables to be used in one product without many of the beneficial nutrients contained when the ingredient was in its natural form.

Many of these products claim to have no added sugar yet contain more sugar than consumers would necessarily be aware of. For example, an orange and mango fruit juice claiming to have no added sugar contains 16.2g/ 3.25 teaspoons per serving as it largely made up of reconstituted juice and puree.⁶ This equates to approximately half of the daily intake of added sugar at the level considered acceptable for optimal health and wellbeing by the WHO.¹ This is reinforced by the recommendation within the Australian Dietary Guidelines to limit fruit juice consumption due to its low fibre and high sugar content.⁴

- **Honey and maple syrup**

Honey and maple syrup should be included in the added sugar definition, as well as treacle, molasses and all other syrups. These ingredients are largely made up of fructose and glucose and are used as sweetening agents either independently or in mass produced packaged products. While the overall nutritional profile of honey is better than refined sugar, they are both metabolized the same way and they are promoted to consumers as healthier alternatives. Excessive consumption of added sugar regardless of the source is identified as being a contributor to disease burden due to poor nutrition.⁴

6. Woolworths. (2020). *Product information – Golden Circle Orange & Mango Fruit Drink 2L*. Retrieved from <https://www.woolworths.com.au/shop/productdetails/787165/golden-circle-orange-mango-fruit-drink>

- **Lower energy sweeteners, e.g. D-Tagatose**

D-tagatose is chemically classified as a sugar and should be considered an added sugar. Sweeteners such as sorbitol that do not contain sugar would not be considered an added sugar.

- **Malt and malt extracts**

Malt/ malt extracts should be included in the added sugar definition as per ‘no added sugar’ claim requirements under Schedule 4 of the Australian New Zealand (ANZ) Food Standards Code.⁷

- **Maltodextrin**

Maltodextrin should be included in the added sugar definition. It is listed as a sugar in Standard 1.1.2 of the ANZ Food Standards Code and is subject to ‘no added sugar’ claim requirements under Schedule 4 of the Code.^{7,8} Ingredients such as maltodextrin containing monosaccharides and disaccharides created through controlled hydrolysis and added during food processing must be declared as added sugars according to U.S. food labelling rules.⁹ It also falls within the category of a sugars-based ingredient according to Canadian food labelling rules.¹⁰

(3) No exemptions from displaying added sugar information in the NIP

All products that carry a NIP should include added sugar information. This will ensure product labelling consistency and allow product comparison. Specific categories that were identified as possibly exempt from added sugar labelling are discussed below.

- **Single ingredient foods**

These types of food should carry added sugar labelling, particularly given that some of these foods contain high levels of sugar. Some examples include fruit juice, dried fruit and honey as previously discussed. The same principles apply as these foods have been processed to the level where they can become detrimental to health and they have the same effect on metabolic health as other types of sugars.

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7. Australian Government Federal Register of Legislation. (2020). Australia New Zealand Food Standards Code. *Standard 1.1.2 – Definitions used throughout the Code*. Retrieved from <https://www.legislation.gov.au/Details/F2020C00732>
 8. Australian Government Federal Register of Legislation. (2017). Australia New Zealand Food Standards Code. *Schedule 4 – Nutrition, health and related claims*. Retrieved from <https://www.legislation.gov.au/Details/F2017C00711>
 9. United States Department of Health and Human Services, Food and Drug Administration, Centre for Food Safety and Applied Nutrition. (2019). *Nutrition and Supplement Facts Labels: Questions and Answers Related to the Compliance Date, Added Sugars, and Declaration of Quantitative Amounts of Vitamins and Minerals: Guidance for Industry*. Retrieved from <https://www.fda.gov/media/117402/download>
 10. Government of Canada, Canadian Food Inspection Agency. (2020). *List of ingredients and allergens on food labels – definitions*. Retrieved from <https://www.inspection.gc.ca/food-label-requirements/labelling/industry/list-of-ingredients-and-allergens/eng/1383612857522/1383612932341?chap=9#s29c9>

- **Foods that do not contain added sugars**

It is appropriate to include these foods as a zero value for added sugar would inform consumers which is the objective of improved added sugar labelling. Other elements of the NIP may not display a value next to a specific ingredient, but sugar is a consistent feature of the NIP. If statements about the nutritional content or a health claim are made about a particular product, this must be demonstrated in the NIP.

- **Foods usually exempt from NIP labelling**

Added sugar declaration may be appropriate for some products that are usually exempt from carrying the NIP however that is outside the scope of this consultation. We do not recommend displaying a NIP containing added sugar information on alcohol products (not including ready to drink alcoholic beverages). Consumers may perceive that some alcohol products are healthier than others when they are generally harmful and increase the risk of serious illnesses such as oral cancer, other cancers and liver disease.¹¹

- **Ready to drink alcoholic beverages**

Pre-prepared alcoholic beverages are required to display a NIP and should not be exempt from including added sugar information. Sugar is often added to these products and providing them with an exemption would create inconsistency.

- **Special purpose foods (part 2.9 of the ANZ Food Standards Code)**

Regardless of their category, foods that carry a NIP should display added sugar content. Formulated meal replacements, supplementary foods and supplementary sports foods do not have composition limits for sugar and therefore should not be exempt. Many of these products contain added sugar and are marketed to consumers as healthy.

- **Food for infants (Standard 2.9.2)**

It is extremely important that added sugar labelling is included on infant foods. Many infant and children's products contained processed sugars derived from fruit and vegetables, and parents must be able to identify this when they are making these critical purchasing decisions.

11. Cancer Council. (2020). *Alcohol and cancer – National position statement*. Retrieved from <https://www.cancer.org.au/about-us/policy-and-advocacy/position-statements/alcohol-and-cancer>

A comprehensive product review of toddler snacks in major Australian supermarkets found that:¹²

- Almost half of the products reviewed contained more than 25% sugar and up to six sweetening ingredients were used in these products
- Almost half used whole fruit images on packaging
- Half included fruit in their product name or made statements relating to fruit
- 38 types of fruit ingredients were used in the sweet cereal finger food category

Added sugar labelling must reflect the routine use of added sugars in these types of products and the potential detrimental health effects. Parents need to be appropriately informed and supported to make the best possible choices.

Added sugar consumption at any age is detrimental to health, but it is most detrimental to oral health during formative years. The most recent child oral health data in Australia indicates that 42% of children had experienced decay in their primary (baby) teeth and 24% had experienced decay in their permanent teeth.¹³ Added sugar is a key driver of tooth decay in children and regular consumption significantly increases tooth decay risk and can lead to preference for sweet foods, which can then in turn promote obesity and associated health conditions.^{1,4} Prevention is better than cure – avoiding or minimising added sugar consumption in the early years of life supports good oral and general health in the long term.

- **Other food processing methods that can cause changes in sugar content during manufacture**

All processing methods that affect sugar content should be considered. Products' added sugar content at the end of the manufacturing process is what is being consumed regardless of the processing methods used.

- **Basing added sugars declaration on the quantity in the final product versus ingoing ingredients**

As per other elements of the NIP, added sugar should be calculated based on the quantity in the final product. This will give consumers a complete picture of products' nutritional profile with respect to added sugar.

- **Any potential issues arising from quantifying added sugars content**

No issues are expected from a consumer and public health perspective. Strengthening the NIP with this information better equips consumers to make informed decisions. Quantifying added sugar content will help consumers to synthesise a range of product information including the ingredient list, the Health Star Rating (if displayed), product names and messaging on product packaging and through other marketing. Future consideration of pictorial representation of added sugar would further enhance consumer understanding.

12. Obesity Policy Coalition. (2019). *Parents sweet-talked into sugar laden toddler snacks*. Retrieved from <https://www.opc.org.au/media/media-releases/parents-sweet-talked-into-sugar-laden-toddler-snacks.html>

13. Australian Government, Australian Institute of Health and Welfare. (2020). *Australia's children – dental health*. Retrieved from <https://www.aihw.gov.au/reports/children-youth/australias-children/contents/health/dental-health>

Thank you for considering our feedback as part of this consultation and providing us with the opportunity to contribute to the important work being done by FSANZ to enable consumers to make informed decisions in support of the dietary guidelines.

Sincerely



A/ Prof. Matthew Hopcraft
ADAVB CEO



Damian Mitsch
ADA CEO