

IACFO response to Codex [Added Sugar Circular Letter](#)  
January 25, 2024

**Q4: Do you think it is important for Codex to define the term "added sugars"? Please explain.**

- YES**
- NO**
- UNDER DEVELOPMENT**

**Comments:**

It is important for Codex to define the term “added sugars.” We believe there are significant potential consumer information and public health benefits from identifying added sugars as part of quantitative nutrition or ingredient labelling if that is provided on a mandatory basis, provided that the definition of added sugars is clear, comprehensive, and provides relevant information to the consumer about the sugars they should be limiting in their diets.

Within the broader category of sugars, there is a key distinction between naturally occurring sugars found in foods and beverages like fruit, vegetables, and dairy products (i.e., intact sugars); and sugars added to foods and beverages during manufacturing, processing, and preparation or sugars that remain after nutritious components of food are removed (such as in juices made from fruit). Consumption of naturally occurring sugars found in whole minimally processed foods is generally not associated with negative health effects (1), as the amount of naturally occurring sugars in foods and beverages tends to be modest, and these foods and beverages are often rich in fiber and other beneficial nutrients. However, overconsumption of foods and beverages high in non-naturally occurring sugars (especially sugar-sweetened beverages) has been linked to increased risk of type 2 diabetes (2,3,4) and cardiovascular disease (5,6,7), in part by increasing the risk of weight gain (8). This overconsumption can also contribute to dental decay (9). Therefore, reducing consumption of foods and beverages high in non-naturally occurring sugars is an essential public health measure to reduce chronic disease risk.

To implement policies and regulations promoting the reduction of sugars added to the food supply, we must first agree on a definition for these “added sugars.” In this comment, when we use the term “added sugars,” we are referring to the World Health Organization’s (WHO’s) definition of “added sugars”: “sugars that are added to food during food processing, sugars used as sweeteners, and sugars from honey and concentrated fruit or vegetable juices. Added sugars do not include naturally occurring sugars, such as sugars in the intact cell walls of fruit and vegetables, or sugars present in [unsweetened] milk” (10).

A suitable definition for “added sugars” might include substituting the more inclusive term “free sugars” used by the WHO or nominating alternative terms with the same meaning. Too narrow a definition of added sugars will limit consumers’ understanding of sugar in products and could perpetuate a ‘health halo’ unjustifiably implying benefits of many ingredients and foods that they do not possess. It is therefore critical to include processed fruit ingredients like fruit juices, fruit juice concentrates, pastes, and purees in the definition. Codex should look to the more inclusive definition of “free sugars,” a term that WHO—a parent organization of Codex—uses for nutrition recommendations instead of “added sugars.” WHO defines “free 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 concentrate” (11). In 2015, WHO published guidelines recommending that adults

and children reduce their daily intake of free sugars to less than 10% of their total energy intake, and that a further reduction to below 5% or roughly 25 grams (6 teaspoons) per day would provide additional health benefits (12). Codex could consider defining both added sugars and free sugars, and ideally focus on the free sugars definition because it aligns with WHO guidelines on sugar intake.

By promoting international harmonization, Codex can help save the considerable resources required for governments to individually develop their own definitions and can contribute to a 'level playing field' for industry between markets as well as facilitating the work of a robust, independent, and transparent monitoring system of the food supply. This could also help correct misleading product labelling and advertising and protect health, two fundamental aims of Codex.

A definition of added sugars and its disclosure on labelling and advertising will also ensure that consumers understand whether the products they are purchasing contain only sugars naturally present in nutritious whole foods or have, essentially, been fortified with sugar. Providing consumers with information about the added sugars content of their foods and beverages could thus help reduce confusion and encourage healthier choices. For more information, see our comments in response to Question 6.

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11. World Health Organization Regional Office for Europe. Sugars Factsheet. June 2022.  
<https://cdn.who.int/media/docs/librariesprovider2/euro-health-topics/obesity/sugars-factsheet.pdf>.  
 Accessed January 19, 2024.
12. Guideline: Sugars intake for adults and children. Geneva: World Health Organization; 2015.

**Q5: If your answer to question 4 is YES, which committee do you think, under its mandate, should develop such a definition? Please explain.**

- Codex Committee on Food Labelling (CCFL)**
- Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU)**
- OTHER**

**Comments:**

We seek the advice of the Codex Secretariat and WHO to determine which Committee is best placed to develop a definition, perhaps with reference to how definitions for similar food components have been developed historically.

We note the potential for commercial conflicts of interest between the manufacturers and sellers of packaged products that are high in added sugars and policymaking in this area, and suggest the development of any definition be made with sufficient safeguards to ensure the development of a comprehensive definition that includes all sugars that are consumed alone or in foods that are harmful to health.

While we respect the advice of the Codex Secretariat and WHO, our instinct is that the Codex Committee on Food Labelling (CCFL) should develop this definition, because added sugars should be labeled on all foods, not just foods for special dietary uses (see response to Question 6).

**Q6: Do you think Codex should include added sugar on the nutrient declaration list? If yes, should it be mandatory or voluntary? Please explain.**

- YES, VOLUNTARY**
- YES, MANDATORY**
- NO**
- OTHER**

**Comments:**

We believe that added sugars should be like other components required to be listed on a mandatory basis in the nutrient declaration (energy, saturated fat, sodium, total sugars, and some other nutrients of public health importance) under the Codex Guidelines on Nutrition Labelling, as well as its percentage contribution. Mandatory disclosure is the only way to ensure that added sugar content will be disclosed on all foods and beverages containing added sugars. Voluntary declarations are only likely to be made when a company perceives marketing benefits, such as when a product contains no or low amounts of added sugar. As a related example, five years after Australia's adoption of a voluntary Health Star Rating

front-of-package nutrition labelling policy in 2014, the voluntary label (ranging from 1/2 to 5 stars) appeared on less than half of applicable products (41%) (1). To fully inform consumer choices, and contribute to public health benefits from reducing excess added sugar consumption, consumers must have this information on all packaged products.

The mandatory quantitative reporting of the amounts of added sugar on the nutrient declaration (and ingredient) list could support added sugar reduction activities at the consumer, industry, and government levels.

For consumers, reporting the amounts of added sugar on the nutrient declaration list (and ingredient list) can promote greater consumer understanding. Furthermore, the inclusion of added sugar on the nutrient declaration list could provide consumers with information they need to follow dietary guidelines, which could in turn encourage healthier choices.

At the industry level, the inclusion of added sugar on the nutrient declaration list could encourage manufacturers to reduce added sugars in their products. For example, after trans fats were required to be included on the nutrient declaration list in the U.S., many manufacturers reformulated their products to reduce trans fat content (2). Inclusion of added sugar on the nutrition declaration list would also help government agencies and researchers gather data to monitor added sugar content in the food supply over time and track trends in added sugar consumption, including differences in consumption across sociodemographic groups, and monitor compliance with voluntary or mandatory added-sugar-reduction programs. It would also allow for the evaluation of regulations, policies, and other efforts to reduce added sugar exposure and consumption.

Furthermore, mandatory added sugar information on the nutrient declaration list would ensure fair competition between industries. When all companies are required to disclose the amount of added sugar in their products, it promotes fair competition. Companies would be compelled to compete on factors beyond taste, such as nutritional content. This would also provide a common ground for international trade by establishing standardized criteria for food products. Mandatory labelling of added sugar aligns with efforts to standardize information on nutritional content, making it easier for companies to adhere to consistent rules when trading across borders. It can simplify negotiations and help avoid trade barriers arising from differences in labelling requirements.

Mandatory added sugar labelling would also enhance transparency in the food industry. Consumers are more likely to trust products with clear and accurate information, and this trust can be beneficial for industries.

Finally, disclosing the added sugar content of foods and beverages on product packages can facilitate nutrition policies and regulations that have disclosure as a prerequisite. This includes nutrition standards for government and corporate food procurement, such as in schools to help improve the diet quality of children by limiting the amount of added sugar in products they are served, and front-of-package labelling regulations to make it easier for consumers to make informed, healthy choices when grocery shopping.

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2. Downs SM, Bloem MZ, Zheng M, Catterall E, Thomas B, Veerman L, Wu JH. The impact of policies to reduce *trans* fat consumption: A systematic review of the evidence. *Curr Dev Nutr*. 2017 Nov 13;1(12):cdn.117.000778.