



FSANZ



8 October 2023

**Re: Submission of Proposal P1062 – Defining added sugars for claims**

For 30 years the New Zealand Beverage Council has represented New Zealand's non-alcoholic beverage sector.

Our members represent over 75 percent of the non-alcoholic ready-to-drink beverages sold at retail level in New Zealand and comprise the brand owners, manufacturers, bottlers and suppliers of New Zealand's juice, carbonated drinks, flavoured-dairy and bottled water brands.

Our membership is made up of a wide range of companies operating in New Zealand – from some of the largest multinational brands in the world through to some the country's smallest boutique producers, as well as those companies that provide a wide range of goods and services to those companies.

With regards to P1062 above, we wish to support the submission made by the Australian Beverage Council, as we share their concerns about specific aspects of the proposal.

While we are pleased to be able to provide feedback on such an important proposal, we are disappointed that our joint request for a more appropriate timeframe for consultation has not been accepted.

Along with the ABCL in general we support efforts to help consumers make more informed choices about their dietary intake, and for FSANZ continuing to set 'no added sugar(s)' claim conditions of ingredients to foods within the Food Standards Code.

However, we do not support some of the proposed amendments to Schedule 4 and are concerned they might have the opposite effect and make it harder for consumers to make informed choices and potentially undermine the credibility of the system.

We agree with the ABCL's recommendations.

1. A blend of single strength fruit products such as fruit puree + fruit juice should be permitted to make a 'no added sugar' claim.
2. A distinction between fruit drinks that are (i) juice + water and (ii) juice + water + added sugar. Fruit drinks without added sugar should be permitted to make a no added sugar claim.
3. Concentrated fruit products when reconstituted with water to single strength should not be considered 'added sugar'.
4. Exclude low energy sugars, such as D-tagatose, from 'added sugars' given their low energy value and how the body processes low energy sugars.
5. Exclude carry-over ingredients from 'added sugars' given the amount of sugar is inconsequential in the final product.
6. Separate honey, malt, malt extracts, concentrated fruit juice and deionised fruit juice from sugars which are sugar, as opposed to sugars from products that contain sugar.
7. Proposal P1062 be conducted in parallel with Proposal P1058.

Thank you for the opportunity to be involved and we are very keen to continue to work on these proposed changes as they are significant for our members and the New Zealand consumers.

Yours sincerely

