Response ID ANON-JN9Z-F838-M

Submitted to P1062 - Defining added sugars for claims
Submitted on 2023-10-07 00:14:02

Complete your submission

Your details

What is your name?

Contact person:
[redacted]

What is your email address?

Email address:
[redacted]

What is your telephone number?

Telephone:
[redacted]

Which one of the following groups do you most affiliate with?

Food industry

If other, please specify:

What is the name of your organisation?

Please write N/A if this does not apply.:
Nutritics LTD

What is your position title?

Please write N/A if this does not apply.:
[redacted]

Are you the contact person for your organisation?

Yes

If you are not the contact person for your organisation, please provide an alternative contact and details. If not applicable, please leave blank.

Contact person's name:

Email address:

Telephone:

Position title:

Have you read the P1062 – Defining added sugars for claims call for submission paper?

Yes

Confidential information

All submissions will be published, including redacted versions of confidential submissions. We will not publish material that we accept as confidential. Does your submission contain confidential information?

No. My submission does not contain confidential information.

Proposed changes to 'no added sugar(s)' claim conditions

1 FSANZ proposes to continue to set 'no added sugar(s)' claim conditions based on the addition of ingredients to foods (see section 5.2 of the Call for submissions document).

Do you have any comments on this approach?:

2 FSANZ proposes a food displaying a 'no added sugar(s)' claim must not contain an 'added sugars' as an added ingredient including an ingredient of a compound ingredient. FSANZ proposes defining 'added sugars' for this claim condition (see section 5.2.1.4 of the Call for submissions document).

Do you have any comments on this approach or the defined added sugars (see below)?:

3 FSANZ proposes 'no added sugar(s)' and 'unsweetened' claims are not permitted on foods containing the hexose monosaccharide D-tagatose, as an ingredient, consistent with existing claim conditions in the Code. As D-tagatose is a hexose monosaccharide, it is captured in the definition of 'added sugars' (see section 5.2.2 of the Call for submissions document).

Do you have any comments on this approach?:

4 FSANZ proposes foods containing low energy sugars (mono- and disaccharides), as ingredients, listed in subsection S11—2(3) of Schedule 11 not be permitted to display 'unsweetened' claims (see section 5.2.2 of the Call for submissions document).

Do you have any comments on this approach?:

5 FSANZ proposes a food displaying a 'no added sugar(s)' claim must not contain the fruit products listed below as an added ingredient (including as an ingredient of a compound ingredient). FSANZ proposes to exempt fruit products which are lemon or lime fruit (see section 5.3 of the Call for submissions document).

Do you have any comments on this approach or the fruit products listed?:

6 FSANZ proposes a fruit product which is the food for sale (e.g. fruit juice) be permitted to make a 'no added sugar(s)' claim. This includes when the food is sold as a singular fruit (e.g. apple juice) or a blend of different fruits (e.g. blend of fruit juices), providing the food contains no 'added sugars' or other products identified in claim conditions, as added ingredients. A blend or combination of different fruit products (e.g. fruit juice and fruit purée) will not be permitted to make the claim. FSANZ also proposes to clarify that fruit does not include legumes, fungi, herbs, nuts and spices for the purpose of the claim conditions (see section 5.3 of the Call for submissions document).

Do you have any comments on this approach?:

7 FSANZ proposes 'no added sugar(s)' claims are not permitted when the concentration of sugars in the food is increased from the hydrolysis of carbohydrates during food manufacture, except when the sugars concentration in cereal-based plant milks made using hydrolysis is ≤ 1.5% (and the product otherwise meets claim conditions) (see section 5.3.2 of the Calls for submissions document).

Do you have any comments on this approach?:

8 FSANZ proposes to maintain the existing condition that a food displaying an 'unsweetened' claim must meet the conditions for a 'no added sugar(s)' claim, noting that the amended 'no added sugar(s)' claim conditions will apply (see section 5.4 of the Call for submissions document).

Do you have any comments on this approach?:

9 FSANZ proposes to maintain the existing condition for intense sweeteners, sorbitol, mannitol, glycerol, xylitol, isomalt, maltitol syrup or lactitol. FSANZ proposes a food containing low energy sugars (mono- and disaccharides) listed in subsection S11—2(3) of schedule 11, as an ingredient (including an ingredient of a compound ingredient), not be permitted to display an 'unsweetened' claim (see section 5.4 of the Call for submissions document).

Do you have any comments on this approach?:

10 FSANZ is proposing a two-year transition period to allow producers, manufacturers and importers time to make any required labelling changes for products carrying 'no added sugar(s)' or 'unsweetened' claims to comply with the new claim conditions (see section 7 of the Call for submissions document).

Do you have any comments on this approach?:

Data and evidence

11 Do you have any data or are you aware of published data on the number of products with 'no added sugar(s)' or 'unsweetened' claims in Australia and/or New Zealand (see data used for this proposal at section 3.1 of the Call for submissions document)?

No

If yes, please upload your file here.:
No file uploaded

12 Do you have any evidence or are you aware of published literature on consumer understanding of and responses to 'no added sugar(s)' or 'unsweetened' claims on food products (see evidence used for this proposal at section 3.2 of the Call for submissions report and Supporting

Document 1)?

No

If yes, please upload your file here.:
No file uploaded

13 Do you have any data or know of any published data on the costs of labelling changes per stock keeping unit or package type (see data used for this proposal at Attachment E to the Call for submissions document)?

No

If yes, please upload your file here:
No file uploaded

Additional comments

Comments and other input

Additional comments and input:

Please find attached the position of Nutritics Ltd in regards to P1062 - Defining added sugars for claims

Please upload additional files here.:
FSANZ - Defining Added Sugars P1062 - Nutritics Response.pdf was uploaded

Feedback

What is your level of satisfaction with using this platform to complete your submission?

Satisfied

Do you have any feedback you would like to provide to FSANZ regarding this new platform?

No

If yes, please provide details.:

Proposal Name	Defining added sugars for claims
Proposal Number	P1062
Company	Nutritics Ltd
Contact Person	[redacted]
Position	[redacted]
Address	[redacted]
Phone	[redacted]
Email	[redacted]
Date of Submission	[redacted]
Company level submission was authorised	[redacted]

Defining added sugars for claims - Nutritics response

Nutritics is a software designed for managing food data and has a track record of providing reliable support to the global food industry. By utilising dependable methods to update data points, Nutritics can improve the accuracy of nutritional composition analyses in situations where they might otherwise be impractical. In Australia and New Zealand, Nutritics can offer easily accessible food composition data with added sugar information, enabling the food industry to create reliable product labels based on valid data sets. However, the challenge for the industry lies in ensuring that manufacturers supply accurate data on their products, which can then be communicated to food companies using those products and then ultimately onto consumers. With prior experience in this area, Nutritics is well-equipped to assist the industry by accurately calculating specifications in line with established methodologies for determining free and added sugars.

The negative health outcomes of an intake high in added sugars is well documented and as a result, the World Health Organisation (WHO) recommends that no more than 10% of an individual's total energy comes from free sugars, or less than 5% for added health benefits [1] . The WHO defines free sugars as monosaccharides and disaccharides added to foods and drinks by the manufacturer, cook or consumer, and sugars naturally present in honey, syrups, fruit juices and fruit juice concentrates[1]. As noted in FSANZ Review of Nutrition labelling for added sugars' proposal, within Australia and New

Zealand, there is no agreed definition of ‘added sugars’ [2] however it is noted that a definition would be developed by FSANZ.
Nutritics is a software that specialises in food data management, enabling businesses to uncover the hidden value of food data in real-time. It offers a wide range of functionalities such as managing recipes, creating food labels, planning meals, publishing menus, analysing individuals' diets, and measuring environmental impact. Nutritics provides automated, easy-to-use, and highly adaptable solutions that promote compliance with food law, food safety, and the accurate communication of nutrition information to the public. With over 135,000 clients globally, Nutritics is a leading provider of such services globally. As a result, Nutritics is at the forefront with regulatory changes, including the Food Standards Australia New Zealand Act 1991[3], and has the infrastructure in place to implement changes to labelling requirements in a timely manner. Additionally, Nutritics has developed automated mapping software that enables food composition datasets to be optimised using published food composition data and published methodologies [4] for nutrient data mapping to produce comprehensive and complete nutrient sets for foods.

P1062 seeks to enable consumers to make more informed food choices, in line with dietary guidelines. Nutritics supports proposal P1062, to amend the Australia New Zealand Food Standards Code to define and clarify added sugars, for the use of a ‘no added sugar claim’.

Processing or concentrating fruit, whether through methods such as drying, powdering, pulping or pureeing, leads to the release of sugars. Addition of these processed ingredients to a food or drink will increase the sugar content.

Sugars introduced during production are considered added sugars. Therefore, Nutritics agrees that it is justifiable to expand the definition of ‘added sugars’ within the context of a no added sugar claim to include:
• dried fruit other than whole, cut or chopped
• fruit juice (other than concentrate), unless canned or frozen fruit
• fruit juice or fruit powder
• fruit pulp
• fruit purée
• concentrated fruit purée
• a blend or combination of any of these ingredients including ‘added sugars’

The Australian composition database has some added sugar information available following a study by Louie et al.[6] who generated a 10-step methodology which had good reliability in determining the free sugar value of food. O’Brien et al.[7] completed a study in 2019, ‘Updating of a Food Composition Database to Include Values for Free Sugars’ with the aim of developing a method to estimate the free sugar values of 3,292 foods in the food database used in the United Kingdom, McCance and Widdowson[8] . O’Brien et al.[7]

took 3,292 foods in the McCance and Widdowson dataset and assigned a free sugar value to each food. The researchers categorised foods based on Nutritics numerical category classification, developed a coding method by examining other literature and then assigned the free sugar values to foods using this coding method. O'Brien et al. concluded that the proposed methodology is applicable for supplementing free sugar data within Nutritics software. As a result of this research, Nutritics updated several food databases (*n4*) representing 11686 foods with data points for free sugars.

Nutritics is interested in collaborating with FSANZ to exchange information and support consumer access to free sugar and added sugar values to support appropriate presentation of food information to consumers to enable informed decisions when choosing what foods to consume.

References

1. World Health Organization. Guideline: sugars intake for adults and children [Internet]. www.who.int. 2015. Available from: https://www.who.int/publications/i/item/9789241549028
2. Food Standards Australia New Zealand."Annual Reports." Www.foodstandards.gov.au, Oct. 2022, www.foodstandards.gov.au/publications/Pages/annual-reports.aspx Accessed 7 Mar. 2023.
3. Australian Government Federal Register of Legislation. Food Standards Australia New Zealand Act 1991 [Internet]. www.legislation.gov.au. 2018. Available from: https://www.legislation.gov.au/Details/C2018C00243
4. N.L Lynch, J Kearney M Stack , D O'Kelly , F.E Douglas. The development of a method to estimate amino acid profiles across food composition datasets. 2018. Available from: - https://www.nutritics.com/downloads/resources/Addressing%20limitations%20with%20food%20composition%20data.pdf
5. Huang Y, Kypridemos C, Liu J, Lee Y, Pearson-Stuttard J, Collins B, et al. Cost-Effectiveness of the US Food and Drug Administration Added Sugar Labeling Policy for Improving Diet and Health. Circulation. 2019 Jun 4;139(23):2613–24.

6. Louie JCY, Moshtaghian H, Boylan S, Flood VM, Rangan AM, Barclay AW, et al. A systematic methodology to estimate added sugar content of foods. European Journal of Clinical Nutrition. 2014 Dec 17;69(2):154–61.
7. K. O' Brien, J. Walton, D. O' Kelly, F. Douglas. Updating of a Food Composition Database to Include Values for Free Sugars. 2019.
8. Public Health England. McCance & Widdowson. Composition of foods integrated dataset (CoFID) [Internet]. GOV.UK. 2015. Available from: https://www.gov.uk/government/publications/composition-of-foods-integrated-dataset-cofid