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

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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?:

The George Institute strongly disagrees with this proposed approach for 'no added sugar' claims due to two overarching concerns.

Our first concern is around the inadequacy of the proposed definition of added sugars, which we believe is not comprehensive and fails to meet its intended purpose. At the Food Ministers meeting on 28th July 2023, Food Ministers requested that work be done to incorporate a definition of added sugars into the Food Standards Code as a matter of priority. Ministers highlighted the importance of incorporating added sugars information into the NIP and on front of package labelling. In this current proposal, it is unclear how the definition for added sugars is fit not just for claims, but to facilitate this broader regulatory agenda on nutrition labelling for added sugars.

The proposed definition for added sugars also fails to align with the Australian and New Zealand Dietary Guidelines. This is because many sugars (i.e., those proposed in claim conditions (a)(ii)-(ix)) are only included for the purposes of no added sugar claims, rather than within the definition itself. There are also several food components missing from claim conditions (a)(i)-(ix) entirely (more detail on this is discussed in question 2 below). By the added sugar definition failing to include the food components set out in claims conditions (a)(ii)-(ix), the proposed added sugar definition is limited to claims only, which undermines the original request made by Food Ministers, and limits the application of this definition into other policy areas, including in the NIP and in the Health Star Rating algorithm.

Our second concern is that claim conditions are based on the addition of ingredients to foods – we strongly disagree with this approach for two reasons:

1. 'No added sugar' claims should not be permitted on single ingredient foods that, when added as an ingredient to a food, would make that food ineligible to display a 'no added sugar' claim. More detail on this is discussed in question 6 below.
2. This is inconsistent with proposed claim condition (g), which clearly restricts claims on foods with sugars from processing, rather than solely from the addition to foods.

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)?:

The George Institute does not support this approach as we believe that 'no added sugar' claim conditions should ensure that no food that contains 'added sugars' as defined in the regulation OR is an 'added sugar' (aka is a single-ingredient food) should be able to carry a 'no added sugar' claim. A comprehensive definition of 'added sugar' is required for this purpose.

The George Institute does not support that these sugars need to be physically added as an ingredient for claim conditions to apply. For example, sugars created through processing are not physically added, but these processing techniques can raise the sugar content of a food product beyond what exists in its natural unprocessed form. The George Institute believes that these sugars should be considered within the definition of 'added sugars'. In addition, we strongly disagree with the proposed claim condition (c) - foods for sale that are products listed on proposed claim condition (c)(i)(A)-(H) should not be permitted to carry 'no added sugar' claims. See our response to question 6 for more detail.

To be fit for purpose and meet the Food Ministers' intent, The George Institute believes the definition of 'added sugar' must include all sugars listed in (a)(i) of the draft variation to the Food Standards Code in CFS Attachment A AND all sugars listed in (a)(ii)-(ix) of the draft variation to the Food Standards Code in CFS Attachment A.

We also make the following specific recommendations regarding the proposed components of the definition:

- Isomaltose, sugar alcohols and lactose in whey powder should be added as examples to condition (c)(i) in section 8 of the Draft Explanatory Statement.
- Cane sugar, beet sugar, white sugar, granulated sugar and fruit sugar should be added to condition (c)(iv).
- High fructose corn syrup, tapioca syrup, maple syrup, rice and rice malt syrup should be added to condition (c)(vii).
- Remove the words 'unless the food for sale is fruit juice' from condition (c)(xi); we do not agree that fruit juice should be able to carry a 'no added sugar' claim. See our response to question 6 for more details.
- Add 'and concentrated vegetable juices' to condition (c)(xi).
- Add 'or vegetable juice' after the words 'deionised fruit juice' to condition (c)(xii). While deionised vegetable juice is not currently used in the food supply, excluding it from the definition will result in an opportunity for this exclusion to be exploited in future.
- Add 'whole, cut or chopped dried fruit' to condition (a) (ii). See our additional comments below under 'dried fruit'.
- Add a new fruit classification under condition (a) that captures new processed fruit products on the market that are 100% fruit but are highly processed and high in sugar. e.g., fruit straps and baked fruit bites. See our additional comments below under 'dried fruit'.
- Add canned fruit or frozen fruit that contains fruit juice to condition (a)(iii); we do not support the exclusion of these products from 'no added sugar' claims. Fruit juice should always be considered an added sugar.
- Add vegetable juice powder, vegetable powder, vegetable pulp, vegetable puree, concentrated vegetable puree, a blend or combination of any two or more of the fruit or vegetable ingredients listed above to condition claim (a) (v – ix). See our additional comments below under 'Vegetable products'.
- Add all monosaccharides and disaccharides formed or residual from processing, including from hydrolysis and fermentation during the production of a food. See our response to question 7 for more detail.
- Add low energy sugars (monosaccharides and disaccharides) listed in subsection S11—2(3) of schedule 11. See our response to question 4 for more details.

Vegetable products

FSANZ has proposed that processed vegetable products, such as vegetable juice, pulps or purées, should not be captured in the claim conditions as they are not discussed in the dietary guidelines as being of public health concern in relation to sugar. The George Institute strongly disagrees with this approach.

We do not perceive there to be any technical or physiological reason to consider that sugar from fruit and vegetable products would be processed

differently by the body and therefore they should be treated the same. In FSANZ's background paper to P1058, it was consistently recognised that fruits and vegetables should be treated the same and the acknowledgment in P1062 that fruit products are sugars should extend to the equivalent vegetable products. This is consistent with other jurisdictional determinations such as Public Health England (1) and the US Food and Drug Administration (2). Failure to include vegetable products could see the growth of high sugar vegetable products such as beet juice and corn concentrates, which are already in the food supply for the purposes of sweetening, particularly in infant and toddler foods.

(1) Swan GE, Powell NA, Knowles BL, Bush MT, Levy LB. A definition of free sugars for the UK. *Public Health Nutr.* 2018;21(9):1636–8.

(2) Food and Drug Administration. Added Sugars: Now Listed on the Nutrition Facts Label and How Are They Different. *New Nutr Facts Label* [Internet]. 2020:1–3 [cited 2022 Oct 11]. Available from: <https://www.fda.gov/food/new-nutrition-facts-label/added-sugars-new-nutrition-facts-label>.

Dried fruit

The George Institute strongly recommends that a clear and precise definition of dried fruit (whole, cut or chopped) is included in the Food Standards Code. Across the processed fruit sector, there are now products on the market that do not represent traditional dried fruit products. These include 100% fruit straps, fruit bites and baked fruit pieces.

While these products are technically 100% fruit and therefore eligible to carry 'no added sugar' claims under the proposed changes, these products are highly processed and contain higher levels of sugar than both whole fruit and traditionally dried fruit. A definition of dried fruit should therefore specifically exclude these types of fruit products and instead a new definition for these processed foods should be created to ensure they are ineligible to carry a 'no added sugar' claim, similar to fruit pulps and purees.

The George Institute recently updated an evidence review on the health impact of dried fruits and found there was mixed evidence available in the literature (3). We feel it important to take a precautionary approach and include dried fruit in a comprehensive added sugars definition. This aligns with dietary guideline recommendations in Australia and New Zealand, which recommend these are limited in the diet due to their very high sugar content and the ease with which they can be over-consumed.

(3) Alexandra Jones and Tailane Scapin. Supporting evidence informed policy work on added sugar. August 2023.

<https://www.georgeinstitute.org/sites/default/files/documents/VicHealth-George-Institute-policy-work-on-added-sugars-v3-Aug-2023.pdf>

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?:

The George Institute supports that foods containing D-tagatose should not be eligible to carry a 'no added sugar' or 'unsweetened' claim. However, we do not think this should be limited to D-tagatose. Instead, we believe it should extend to all low energy sugars and do not think this should be noted as a separate claim condition. D-tagatose and all other low energy sugars (monosaccharides and disaccharides) listed in subsection S11—2(3) of schedule 11 should be included in the definition of 'added sugar' in condition (c).

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?:

The George Institute supports this. We strongly believe that there should be consistency between 'no added sugar' and 'unsweetened' claims and, accordingly, low energy sugars (monosaccharides and disaccharides) listed in subsection S11—2(3) of schedule 11 should be in the 'added sugar' definition and no foods containing low energy sugars should be permitted to make 'no added sugar' claims. See our response to question 3 above.

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?:

The George Institute strongly agrees that a food containing the fruit products listed should not be permitted to carry a 'no added sugar' claim, and strongly recommend that the vegetable equivalents are treated the same. See our response to question 2. However, we strongly disagree with the mechanism for this.

All food components listed in claim conditions (a)(ii)-(ix) and their vegetable equivalents should be included in the 'added sugar' definition in claim condition (a)(i) and NOT as separate components for the purpose of the claims criteria, as currently proposed. Please see our response to question 1 for more details on why this is necessary.

Upon interrogating The George Institute FoodSwitch dataset, we observed that foods containing fruit and vegetable sugars are more likely to use 'no added sugar' claims than those that do not contain these sugars. Some of the highest categories for claims use including the following foods that typically utilise a range of fruit ingredients: fruit purees, fruit bites, fruit straps and pressed fruit products and baby and toddler foods.

In relation to fruit juice specifically:

□ The George Institute strongly recommends that any reference to fruit juice should clearly state this includes blended, reconstituted, full strength and diluted juices.

□ The George Institute strongly disagrees that canned and frozen fruit with added fruit juice should be able to make 'no added sugar' claims. Where fruit juice is added, there should be no claim.

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?:

The George Institute strongly disagrees with this approach.

Allowing fruit products to carry a 'no added sugar' claim when sold as single-ingredient foods but disallowing other products from making the same claim when these fruit products are added to them as an ingredient is not defensible from a health perspective. The sugars in these fruit products have the same effect on the body when consumed. It also perpetuates the unjustified health halo held by some fruit products despite the caveats around their consumption in Australian and New Zealand Dietary guidelines.

Allowing single-ingredient fruit products to display 'no added sugar' claims is particularly problematic in the case of fruit juice.

Our analysis of the FoodSwitch dataset suggests the use of 'no added sugar' claims on fruit juice is very common. According to the 2022 FoodSwitch database, 74% of '100% fruit juice' products (249/337 products) make a 'no added sugar' claim, suggesting such claims provide a valuable marketing tool for industry. We also found that 99% (247/249) of fruit juices making a 'no added sugar' claim exceeded the 125mL serving size recommendation for fruit juice in the Australian Dietary Guidelines. Frequently these products are sold in 500mL bottles intended for consumption by an individual on a single occasion.

A decision to scale back the use of such claims on fruit juices would be consistent with dietary guidelines in both Australia and New Zealand. Specifically, the 2013 Australian Dietary Guidelines recommend fruit be eaten fresh and raw, noting that fruit juice is energy-dense and low in fibre, and when consumed in excess can displace other nutrition foods in the diet and contribute to problems such as obesity. The Australian Dietary Guidelines explicitly recommend whole fruit over fruit juice, providing a limited concession that juice may be consumed occasionally, in small amounts (i.e. 125mL or half a cup), where fresh, frozen or tinned fruit supply is sub-optimal. Despite the assertions of fruit juice producers, this limited concession does not constitute a recommendation for most Australians to drink fruit juice.

In New Zealand, more recently updated Eating and Activity Guidelines refer to World Health Organization recommendations to reduce intake of free sugars (which include naturally occurring sugars in fruit juice) as a reason for the recommendation on added sugars that should be limited in the diet. They also identify fruit juice as a 'high-sugar' drink and recommend eating fresh fruit and drinking plain water instead.

Key outcomes of the FSANZ Consumer Evidence Summary highlight how influential 'no added sugar' claims are in relation to fruit juice in driving purchases and perceptions of healthfulness. For fruit juice, 'no added sugar' was the most influential factor when compared with other information about juice processing or formulation. Previous work by FSANZ to inform P1058 also highlighted evidence that consumers underestimate the sugar content of beverages containing fruit, and that their understanding of the sugar content of beverages containing fruit may be poorer than other beverages.

Growing recognition of the high sugar content of fruit juices and the need to guide consumers towards healthier choices can be seen in the Health Star Rating Review decision to reduce the scores of even 100% fruit juices from their previous score of HSR 5.0 to somewhere in the range of HSR 2.5 to 4.0 depending on sugar content. The voluntary nature of the Health Star Rating system means unfortunately many manufacturers continue to withhold this information from consumers, while continuing to make the 'no added sugar' claims that benefit their bottom line.

The George Institute believes it is time for fruit juice to lose its health halo. Prohibiting these products from voluntarily displaying 'no added sugar' claims is a small but significant step towards reducing the risk of consumers being misled into thinking these juices are nutritionally equivalent to whole fruit.

The George Institute supports FSANZ's proposal that legumes, fungi, herbs, nuts and spices should not be considered fruits for any definition of added sugar or for 'no added sugar' claim conditions.

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 $\leq 1.5\%$ (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?:

The George Institute supports FSANZ's proposal that foods containing sugars from hydrolysis should not be permitted to make 'no added sugar' claims, however we do not support:

- (1) the exclusion of other processing techniques from this definition;
- (2) the exemption for products that contain less than $\leq 1.5\%$ sugars;
- (3) that sugars from hydrolysis are treated differently to other 'added sugars' - these sugars should be considered as 'added sugars'.

The George Institute recommends FSANZ adopt a forward-thinking approach for sugars that are produced by processing methods and include all sugars that are produced or residual as a result of any processing method that results in the end product containing more sugars than the original raw ingredients. This should be drafted to capture any existing and future processing techniques, including hydrolysis and fermentation. This would establish a consistent approach to capturing all sugars that are the result of processing and ensure the 'no added sugar' labelling conditions remain current and future proofed.

We do not support the exemption for foods containing $\leq 1.5\%$ sugars - any food containing sugars should not be permitted to carry a 'no added sugars'

claim. We do not think a threshold to 'level the playing field' between milk alternatives is appropriate. Consumers should be able to rely on a 'no added sugar' claim meaning that there are no added sugars in a product.

The sugars resulting from processing should simply be included in the definition of 'added sugars', not set out in a separate claim condition as currently proposed. A food displaying a 'no added sugar' claim should by definition not contain any 'added sugars'. Aligning the added sugar definition and claims conditions is vital for achieving this.

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?:

The George Institute strongly supports this.

We note that all proposed amendments to 'no added sugar' claim conditions in our submission should also apply to 'unsweetened' claims.

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?:

The George Institute strongly supports the position that a product containing sweeteners should not be able to make an 'unsweetened' claim. However, we strongly disagree with the proposed terminology. The phrase "intense sweeteners" is not defined in the Foods Standards Code nor is the terminology used in literature. It also does not capture all sweeteners used in the food supply.

We strong believe that the terminology "non-sugar sweetener" should be used instead, and that a definition for "non-sugar sweetener" should be added to the Food Standards Code as per the World Health Organization definition of this term. This would ensure all low and non-calorie sweeteners are captured within the definition, including acesulfame K, aspartame, advantame, cyclamates, neotame, saccharin, sucralose, stevia and stevia derivatives.

See: Use of non-sugar sweeteners: WHO guideline. Geneva: World Health Organization; 2023. Licence: CC BY-NC-SA 3.0 IGO.

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?:

The George Institute strongly supports a two-year transition period. A two-year transition period is consistent with previous mandatory labelling changes and with FSANZ cost modelling on a reasonable period to enable industry to update labels within normal cycle of label updates.

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)?

Yes

If yes, please upload your file here.:

Question 11. TGI added sugar submission.docx was 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)?

Yes

If yes, please upload your file here.:

Question 12. TGI added sugar submission.docx was 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 upload additional files here.:

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Feedback

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

Very satisfied

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

Not Answered

If yes, please provide details.:

According to the George Institute FoodSwitch dataset, 5.4% of all foods in the food supply carried a 'no added sugar' claim in 2022 (1613 products out of a total of 29,694).

We have used 2022 FoodSwitch data throughout the submissions to raise some key concerns about certain food categories. The FoodSwitch dataset contains close to 30,000 packaged food and beverage products collected during an in-store audit across major Australian supermarkets and can provide important information about use of "no added sugar" and "unsweetened" claims. If you would like more information about this, reach out to the Ma [REDACTED]
[REDACTED]

Other relevant literature:

- An audit from 2020 in the Illawarra area of NSW found 7.9% of products (n=125) in the dairy yoghurts category carried 'no added sugar' claims (1).
- An audit from 2016 using data collected from supermarkets in South Australia found that 31.7% (n=300) of sugar-containing beverages displayed 'no added sugar' claims. Additionally, 7.9% (n=75) carried 'naturally sweetened/sugar from fruit' claims and 0.3% (n=3) carried 'unsweetened' claims (2).
- Data collected in 2019 across Sydney retailers (supermarkets, chemists and department stores) found 59% (n=164) of ready-to-use infant food pouches carried 'no added sugar' claims. This data also showed that 50% of fruit puree only pouches had a 'no added sugar' claim on the front-of-pack (3).
- A 2019 audit of infant and toddler foods available for sale across South Australian supermarkets found 55% (n=282) carried a 'no added sugar' claim, and 13% referred to containing 'natural sugar' or sugar from fruit and/or vegetables (4).

References

1. Wadhwa S-RS, McMahon AT, Neale EP. A Cross-Sectional Audit of Nutrition and Health Claims on Dairy Yoghurts in Supermarkets of the Illawarra Region of New South Wales, Australia. *Nutrients*. 2021;13(6):1835.
2. Brownbill AL, Miller CL, Braunack-Mayer AJ. Industry use of 'better-for-you' features on labels of sugar-containing beverages. *Public Health Nutrition*. 2018;21(18):3335-43.
3. Brunacci KA, Salmon L, McCann J, Gribble K, Fleming CAK. The big squeeze: a product content and labelling analysis of ready-to-use complementary infant food pouches in Australia. *BMC public health*. 2023;23(1):656-.
4. Simmonds L, Brownbill AL, Zee A, Netting MJ. Health-related marketing messages on product labels of commercial infant and toddler food packaging in Australia: a cross-sectional audit. *BMJ paediatrics open*. 2021;5(1):e001241.

The George Institute is aware of the following published data that supports consumer understanding and response to 'no added sugar' or 'unsweetened' claims on products.

- A qualitative study of young adults' conceptualisation of sugar-containing beverage healthfulness found that many perceived juices to be a healthier option. Juices were viewed by some participants as equating to fruit consumption or as providing important nutrients to the consumer. Participants displayed low levels of knowledge of the actual sugar content in beverages, despite suggesting this is how they primarily assessed beverage healthfulness (1).
- A qualitative study of parents and young adults' perceptions and consumption of sugary drinks found there was a perception among some that different types of sugar have a greater effect on ill-health, with many perceiving "natural" sugars to be "better-for-you." There was some confusion over which juices were naturally sweetened and which had added sugars. Some participants believed that juices were healthier as they contained lower levels of sugar than other sugar-sweetened beverages (SSBs), and others thought juice had other beneficial nutrients. Sometimes fruit juice was equated to liquefied equivalents of fruit (2).
- A study of behaviour, awareness and attitudes of those living in South Australia found 40.8% of South Australians thought fruit juice had less sugar than SSBs (3).
- A study of knowledge and beliefs of Australians regarding sugary drink consumption found that 59% of Australians believed fruit juice is healthier than soft drinks (4).

References

1. Brownbill A, Braunack-Mayer A, Miller C. What makes a beverage healthy? A qualitative study of young adults' conceptualisation of sugar-containing beverage healthfulness. *Appetite*. 1 July 2020. 50:104675. <https://doi.org/10.1016/j.appet.2020.104675>
2. Miller C, Braunack-Mayer A, Wakefield M, Roder D, O'Dea K, Dono J, Ettridge K. "When we were young, it really was a treat; now sugar is just the norm every day" - A qualitative study of parents' and young adults' perceptions and consumption of sugary drinks. *Health Promotion Journal of Australia*. Jan 2020. 31(1):47-57. [10.1002/hpja.257](https://doi.org/10.1002/hpja.257)
3. Miller C, Wakefield M, Braunack-Mayer A, Roder D, O'Dea K, Ettridge K, Dono J. Who drinks sugar sweetened beverages and juice? An Australian population study of behaviour, awareness and attitudes. *BMC Obesity*. Jan 2019. 6:1. <https://doi.org/10.1186/s40608-018-0224-2>
4. Miller C, Ettridge K, Wakefield M, Pettigrew S, Coveney J, Roder D, Durkin S, Wittert G, Martin J, Dono J. An In-Depth Exploration of Knowledge and Beliefs Associated with Soda and Diet Soda Consumption. *Nutrients*. Sept 2020. 12, 2841. <https://doi.org/10.3390/nu12092841>