



The Consumer Voice in Europe

Sugars intake for adults and children

BEUC response to the WHO public consultation

Contact: **Pauline Castres** – food@beuc.eu

Ref.: BEUC-X-2014-023 - 31/03/2014

Summary

BEUC fully supports the WHO's objective to limit free sugars consumption to promote a healthier diet and eventually reduce the incidence of non-communicable diseases¹.

BEUC warmly welcomes the WHO draft guidelines on sugar intake as we believe they will help reduce the presence of sugar in the overall diet and improve public health. Indeed it is urgent to have strong policies in place to achieve the 10% objective as soon as possible and push for more reformulation efforts to reach the new 5% target. As such we encourage the WHO to make the 5% target a strong recommendation and we hope the guidelines will soon be endorsed by governments and industry bodies.

¹ 2008-2013 Action Plan for the global strategy for the prevention and control of non-communicable diseases, WHO, 2009.

1. Introduction

BEUC welcomes the opportunity to comment on the WHO draft guidelines² on intake of sugars.

The public consultation aims at gathering stakeholders' views on WHO recommendations including the methodology and the scientific evidence used to issue the new guidance. The new draft guidelines indicate that a further reduction in free sugars intake would bring additional benefits in terms of public health by reducing the risk of non-communicable diseases in adults and children, with a particular focus on the prevention and control of weight gain and dental caries.

Overall WHO guidelines provide recommendations based on the best available evidence that may be used by governments, health professionals and others to formulate new policies and legislation or to improve existing ones.

While we welcome the public consultation and the need for respondents to declare a potential conflict of interest, we would like to point out that the very limited timeframe and the modalities to access the draft guidelines did not facilitate stakeholders' responses.

For many years BEUC and its members have supported WHO efforts to underline the importance of a healthy diet and the need to reduce certain nutrients consumed in excess. We have repeatedly advised consumers to adopt a diet low in energy-dense food which is high in saturated fats, salt and sugars and instead one abundant with fruit and vegetables, as the WHO recommends.

Sugar intake has particularly been in the spotlight in recent years as research³ has shown that in many parts of the world, including Europe, people tend to consume too much sugar, especially added sugars. Indeed in several EU Member States the average intake of added sugars still exceeds 10% of the energy intake, especially in children.⁴

Furthermore, sugars have been increasingly added to food, both salted and sweet goods. Sugars can be found in small amounts in many products but also at very high levels in certain products. Sometimes in just a single portion of a certain food or beverage consumers can reach the maximum recommended daily dose of 50 grams.

When consumed in excess, sugars are stored as fat in the body, which might induce weight gain and increase the risk of developing diet-related chronic diseases such as cardiovascular diseases and diabetes. As obesity rates are still high and have increased in many regions of the world, including Europe and especially among children, it is vital to take all necessary measures to promote a healthier diet.

² WHO opens public consultation on draft sugars guideline, March 2014

<<http://www.who.int/mediacentre/news/notes/2014/consultation-sugar-guideline/en/>>

³ Added sugar in the diet, Harvard School of Public Health, 2014

<<http://www.hsph.harvard.edu/nutritionsource/carbohydrates/added-sugar-in-the-diet/>>

⁴ European Food Safety Authority. 2010 Scientific Opinion on Dietary Reference Values for carbohydrates and dietary fibre. EFSA Journal 2010;8(3):1462.

Added sugars are of particular concern as they do not have beneficial nutritional properties, compared to fruit and vegetables which contain sugars but also vitamins, minerals and fibres. Many foods and beverages which are major sources of added sugars have lower micronutrient densities compared to foods and beverages that contain naturally occurring sugars⁵. At the same time they often represent the largest portion of the sugars in our food, as highlighted by BEUC members' tests.^{6,7} Therefore we believe reducing intake of added sugars is a major step forward. As such the recommendation should not be conditional, but rather a strong recommendation, meaning the previous 10% target should be replaced by a 5% target.

2. Evidence from BEUC members

BEUC members' test results show that sugars are added to a lot of food products, sometimes at very high levels. For instance, a famous chocolate drink marketed to kids was found to comprise of 77% sugars⁸. By drinking one cup of chocolate drink a child would consume 15.5g of sugars - 31% of the maximum recommended daily dose.

Other breakfast foods can contain alarming amounts of sugars. Research carried out in the UK by the consumer organisation Which?, showed that almost half of all breakfast cereals tested (20 out of 50) contained more than 25g of sugars per 100g of product⁹.

Similar tests carried out in Switzerland and Slovakia showed that more than half of breakfast cereals tested contained more than 30g of sugars per 100g. Some products even contained more than 40g/100g and in Denmark one product was found to contain 45g of sugars per 100g - almost half of the total product was actually made of sugars^{10,11,12}.

This is particularly worrying knowing that most of these breakfast cereals are aimed at children. Yet sugars are also added to a lot of products, both sweet and salted, and sometimes where it is the least expected. Sugars are commonly found in salted goods such as meat products, fish sticks (surimi), pickles, soups, pasta sauce and salad sauce¹³.

Consequently, consumers can end up eating high amounts of sugars and added sugars added to food to improve taste and texture thereby easily reaching and even exceeding the maximum recommended daily intake.

Consumers might not be fully aware that products contain such high amounts of sugars or that it can be found in many products in small quantities, including salted goods. This information is not always available or comprehensive.

⁵ Dietary Reference Intakes for Energy, Carbohydrate, Fiber, Fat, Fatty Acids, Cholesterol, Protein, and Amino Acids (Macronutrients), Institute of Medicine Report (IOM), 2005
<<http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm387533.htm>>

⁶ Added sugar: to consume in moderation, Test-Achats, Test Santé, April/May 2012.

⁷ Investigation Cereal Bars - Healthy snacks ?, Which?, September 2012.

⁸ Added sugar: to consume in moderation, Test-Achats, Test Santé, April/May 2012.

⁹ What's in your bowl? The most popular breakfast cereals compared, Which?, February 2012.

¹⁰ Comparatif Céréales pour enfants – Plein feux sur le taux de sucre, FRC Mieux Choisir, February 2013.

¹¹ Zita za zajtrk – vecina bi lahko pristala na polici med sladkarijami, ZPS, February 2013.

¹² Morgenmad til born fyldt med sukker, Forbrugerradet, January 2013.

¹³ Added sugar: to consume in moderation, Test-Achats, Test Santé, April/May 2012.

The EU Food Information regulation (EU) N°1169/2011 will be fully applicable as of 13 December 2014 and is expected to improve labelling as the amount of sugar per 100g will be displayed on packaging mandatorily. Yet businesses will not be required to put this information on the front of packaging, which would have helped consumers to see that information at a glance.

In addition, the information will be on total sugars, not added sugars. We believe this constitutes a missed opportunity to better inform consumers who need clear information on the nutritional profile of food. As a consequence only reformulation efforts can lead to a reduction of added sugars consumption. In addition, labels do not always reflect the true nature of a product and can be misleading. This is especially true of food presented as healthy, such as grain bars and breakfast cereals with descriptive claims. Sugars were found to represent up to 30% of many bar snacks. These products contain naturally occurring sugars but most of the sugars are actually added sugars.

Which? research found that for snack bars containing naturally occurring sugars (i.e. raisins and apple puree) the main source of sugars was glucose-fructose syrup¹⁴.

As for breakfast cereals, many are presented as healthy alternatives and are promoted for weight loss, while they contain a lot of sugars¹⁵. Moreover consumers can be misled by claims such as '*sugar free*' or '*without sugar*' while the sugar has simply been replaced by other free sugars such as juice concentrate or honey. In the end it might be difficult for consumers to identify products containing high amounts of sugar, because the information is missing on front-of-pack, incomparable due to different portion sizes or because it is misleading.

This was revealed in an online quiz launched by our Dutch member Consumentenbond, asking people which products they thought contain the highest amounts of sugars.¹⁶

The practice to add sugars, in small or high quantities, should not be as widespread as it currently is. If consumer organisations have fought hard to improve food labelling it is vital to improve the nutritional quality of food offered to consumers and limit the amount of the nutrients identified as consumed in excess and as risk factors for the development of diet-related chronic diseases and other health issues such as dental caries. Consequently added sugars should be limited in the overall diet and a new recommendation will help head towards stronger policies.

¹⁴ Investigation Cereal Bars - Healthy snacks ?, Which?, September 2012.

¹⁵ What's in your bowl? The most popular breakfast cereals compared, Which?, February 2012.

¹⁶ Ook als je wilt weten wat de gezondste optie is, kunnen heldere labels op verpakkingen bruikbaar zijn, Consumentenbond, 2013.

3. Recommendations

First, we urge decision makers to endorse the WHO's recommendation. If the 10% target should be the first objective we believe the new proposed target of 5% should be included in Member States plans to fight obesity and diet related diseases.

The 10% target fixed by WHO in the previous Guidelines on sugar intake from 2002 should have been achieved by now and fixing a more ambitious target will act as an incentive to go beyond the primary aim and achieve more progress. As many products contain too much sugar, leading to higher intakes, this new target will act as an incentive to reduce added sugar levels in food products.

As certain categories (e.g. sugar-sweetened beverages, breakfast cereals, biscuits) were identified as containing high amounts of sugar we believe specific quantified targets should be set to ensure maximum reformulation efforts are devoted to these specific categories.

Secondly, we urge food producers to reformulate products and reduce the amount of added sugars. The fact that similar products often contain diverging amounts of sugars shows there is still room for improvement. Consequently, companies must learn from each other and find a way to reduce sugars levels in food products. However, sugars should not be replaced by high amounts of fat or other nutrients that consumers should limit.

In addition, sugars should not be merely replaced by juice concentrates or equivalents and be labelled '*without added sugars*' - still a widespread practice. These products are sold to the consumers under the '*natural*' branding while they contain substantial amounts of added sugars. Consumers are not always aware that fruit juice concentrates, fructose, honey or agave syrup, which benefit from a healthy image, are added sugars.

Reformulation should would trigger lower sugars levels without overcompensating by adding other nutrients in high quantities, such as fat or salt, or by substituting sugar by other added sugars whose names are not explicit.

Eventually the industry should not merely use sweeteners, but devote more efforts towards a reduction of sugars levels, which will help consumers become used to less sweet flavours.

It is also critical to remove sugars from products where they should not be present in the first place. Eventually we believe the new target should be used by the industry to refine their Guideline Daily Amounts (GDAs) values for sugars. It will ensure labels give actionable advice that is consistent with the health risk posed by this nutrient.

END