



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD LABELLING

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### DISCUSSION PAPER ON THE ESTABLISHMENT OF A DEFINITION OF ADDED SUGARS

(Prepared by Costa Rica)

#### INTRODUCTION

1. Sugar content in food has become a key element for consumers' purchasing decisions, driven by health concerns, dietary trends, taste preferences, and the impact on energy consumption. Awareness of the health effects of excessive sugar has meant an increase in reading nutrition labels and looking for low-sugar products. Similarly, low-carb diets and the demand for low-energy options have driven innovation in the food industry, offering alternatives with low-energy sweeteners or no added sugar. By clearly displaying the added sugar content on the front of the package, consumers can easily compare different products and make healthier choices. This is especially useful for people who want to reduce their sugar intake or follow a specific diet.
2. It is essential that consumers have accurate information about the nutrient content of the foods they buy. Labels with the claim "no added sugar" are becoming increasingly common. In addition, added sugars are frequently used as part of the rationale for front-of-pack nutrition labelling (FOPNL). This approach not only facilitates healthier choices but is also a key tool to address the growing incidence of obesity and chronic noncommunicable diseases worldwide.
3. Currently, the *Guidelines on Nutrition Labelling* (CXG 2-1985) include only the definition of "sugars". In addition, the *Guidelines for the Use of Nutrition and Health Claims* (CXG 23-1997) only include definitions relating to the types of nutrition and health claims, but not for nutrients. Therefore, there is no internationally agreed definition of "added sugars", resulting in difficulties in harmonizing labelling standards.
4. This discussion paper presents comments received from Codex members and observers on various aspects related to the definition, declaration and regulation of added sugars in different countries. A project document is also included for consideration by the Codex Committee on Food Labelling (CCFL).

#### BACKGROUND

5. At the CCFL47, there was a discussion on the need to establish a definition of added sugars to be incorporated in the *Guidelines on Nutrition Labelling* (CXG 2-1985), and to consider the inclusion of the declaration for added sugars in Section 3.2 "Listing of nutrients". It was noted that harmonization of the definition and declaration of added sugars on nutrition labelling was important to provide consumers with accurate information on the sugar content of foods, thereby enabling them to make healthier choices, as well as incentivizing manufacturers to follow recommendations to reduce the amount of added sugars in their products.
6. CCFL47 agreed that Costa Rica would prepare a discussion paper on the definition for added sugars and that:
  - a. The discussion paper would take into account the need for including added sugar on the nutrient declaration list; and
  - b. A CL would be issued to request for information to support the development of the discussion paper (REP23/FL, para. 179).

#### REQUEST FOR INFORMATION THROUGH CL 2023/94-FL

7. In November 2023, circular letter [CL 2023/94-FL](#) was distributed in order to compile the information that has served as input for the preparation of this discussion document.

8. The consultation consisted of eight questions, covering the following:
- Explore whether countries have an official definition of added sugars and whether the declaration of added sugars is voluntary or mandatory.
  - Know the methodology used or planned to verify the declaration of added sugars, if applicable.
  - To seek input on the importance of Codex defining the term "added sugars" and which committee should be in charge of its development.
  - It was asked whether added sugar should be included in the list of nutrients to be declared as defined by Codex, and whether this inclusion should be mandatory or voluntary.
  - Potential barriers or limitations to developing a definition of "added sugars" within the CCFL framework were explored.
9. 53 responses were received from 32 member countries, one member organization and 19 observers<sup>1</sup>.
10. The discussion and analysis of the responses to CL 2023/94-FL is presented in Appendix I. The CCFL is invited to review the conclusions and recommendations of the discussion paper based on the summary provided. The project document (Appendix II) will be reviewed at CCFL48 to determine the specific work to be included and revised if necessary.

### **CONCLUSIONS**

11. There is significant diversity in definitions of added sugars among countries, with some having well-established and detailed definitions, while others are still under development or lack formal definitions.
12. Although there is no clear analytical methodology to quantify and differentiate added sugars from natural sugars, which could limit the mandatory declaration of added sugars, this does not preclude the need to develop a definition.
13. There was broad support among Codex Members and Observers for the need to establish a clear and harmonized definition of "added sugars," based on sound scientific evidence, that is practical for industry and understandable to consumers. It is important to consider involving the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) and Codex Committee on Methods of Analysis and Sampling (CCMAS) if this work is undertaken.

### **RECOMMENDATIONS**

14. CCFL48 is invited to review the project document presented in Appendix II and consider:
- i) to undertake further work on the development of a definition of "added sugars".
  - ii) the relevant Codex texts (*Guidelines on Nutrition Labelling* (CXG 2-1985) and the *Guidelines for the Use of Nutrition and Health Claims* (CXG 23-1997) to:
    - a) decide where the definition of "added sugars" should be incorporated.
    - b) analyze whether added sugar should be included in the list of nutrients to be declared.
    - c) decide whether the declaration of added sugars should be mandatory or voluntary.

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<sup>1</sup> Comments by Argentina, Brazil, Canada, Chile, Costa Rica, Colombia, Cuba, Cyprus, Ecuador, Egypt, European Union, Guatemala, Guyana, India, Indonesia, Iran, Iraq, Japan, Kenya, Malaysia, New Zealand, Norway, Paraguay, Peru, Philippines, Saudi Arabia, Singapore, South Africa, Tunisia, United Arab Emirates, United Kingdom, Uruguay, USA and Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB), AOCS - American Oil Chemists' Society, CEFS, ENCA, ENSA, FIVS, Food Industry Asia, FoodDrinkEurope, ICBA, ICGMA, IDF/FIL, IFT, IFU, International Association of Consumer Food Organizations, International Baby Food Action Network, International Special Dietary Food Industries, The Healthy Caribbean Coalition, World Federation of Public Health Associations, World Public Health Nutrition Association.

**APPENDIX I****DISCUSSION AND ANALYSIS OF THE RESPONSES TO CL 2023/94-FL**

The following is a summary of the comments received in response to CL 2023/94-FL. The details of the responses received are available [here](#).

**Question 1: Does your country have a definition of added sugars? If YES, please provide the definition and its reference (links, documents and other information you consider necessary).**

In response to this question, 14 member countries indicated that they do not have a definition of added sugars while 12 members stated that they have incorporated it into their regulatory framework or voluntary programs. Three members indicated that they had a definition under development. One member organization indicated that it does not have a definition of added sugars for nutrition labelling purposes, however, it provided some definitions that it uses for different purposes.

Most members with an established definition provided information on the text of the definition and the respective reference. These definitions vary in their level of detail; Some countries have very specific definitions, while others provided more general definitions, as shown in Table 1.

**Table 1.** Definitions of "added sugars" provided by Codex members

Member	Definition
<b>Argentina</b>	<p>Added sugars: These are the monosaccharides and disaccharides added to foods and non-alcoholic beverages during their manufacture and/or reconstitution in accordance with the preparation instructions indicated on the label by the manufacturer. Sugars that are naturally present in honey, syrups, juices and fruit and vegetable concentrates are included.</p> <p>REF: Article 2 of Regulatory Decree No. 151/2022, of Law No. 27642.</p> <p>Article 225 of the Argentine Food Code (CAA), which requires its declaration on packaged foods, through Joint Resolution No. 7/2022.</p> <p>Link to the Law:  <a href="https://www.boletinoficial.gob.ar/detalleAviso/primera/252728/20211112">https://www.boletinoficial.gob.ar/detalleAviso/primera/252728/20211112</a></p> <p>Link to the Decree:  <a href="https://www.boletinoficial.gob.ar/detalleAviso/primera/259690/20220323">https://www.boletinoficial.gob.ar/detalleAviso/primera/259690/20220323</a></p> <p>Link to Chapter V of the CAA:  <a href="http://www.conal.gob.ar/sitio/pdf/20220926154204.pdf">http://www.conal.gob.ar/sitio/pdf/20220926154204.pdf</a></p>
<b>Brazil</b>	<p>The definition encompasses all monosaccharides and disaccharides added during food processing, including fractions derived from the addition of:</p> <ul style="list-style-type: none"> <li>a) sugar cane, beet sugar, and sugars from other sources.</li> <li>b) honey, molasses, treacle, rapadura, sugarcane juice, and malt extract.</li> <li>c) sucrose, glucose, fructose, lactose, and dextrose.</li> <li>d) inverted sugar, syrups, maltodextrins, and other hydrolyzed carbohydrates; and</li> <li>e) ingredients containing any of the mentioned above.</li> </ul> <p>The definition explicitly excludes sugars naturally present in milk and dairy products, as well as sugars naturally occurring in fruits and vegetables in various forms, such as whole, in pieces, powdered, dehydrated, in pulps, in purees, in integral juices, in reconstituted juices, and in concentrated juices.</p> <p>REF: The regulation (RDC 429/2020) can be accessed in the following link:  <a href="http://antigo.anvisa.gov.br/legislacao#/visualizar/434473">http://antigo.anvisa.gov.br/legislacao#/visualizar/434473</a></p>
<b>Colombia</b>	<p>(...) 3.7. Added sugars: are added or added sugars, including sugars that are added during food processing or packaged as such, and include sugars such as monosaccharides and disaccharides, those contained in syrups and those naturally present in honey and fruit or vegetable juice concentrates. These do not include intrinsic sugars found in milk, fruits, and vegetables and sugars that are non-glycemic carbohydrates.</p> <p>REF: Links associated regulations:</p>

	<p>Resolution 3803 of 2016  <a href="https://www.minsalud.gov.co/Normatividad_Nuevo/Resoluci%C3%B3n%203803%20de%202016.pdf">https://www.minsalud.gov.co/Normatividad_Nuevo/Resoluci%C3%B3n%203803%20de%202016.pdf</a></p> <p>Resolution 810 of 2021  <a href="https://www.minsalud.gov.co/Normatividad_Nuevo/Resoluci%C3%B3n%20No.%20810de%202021.pdf">https://www.minsalud.gov.co/Normatividad_Nuevo/Resoluci%C3%B3n%20No.%20810de%202021.pdf</a></p> <p>Resolution 2492 of 2022  <a href="https://www.minsalud.gov.co/Normatividad_Nuevo/Resoluci%C3%B3n%20No.%202492de%202022.pdf">https://www.minsalud.gov.co/Normatividad_Nuevo/Resoluci%C3%B3n%20No.%202492de%202022.pdf</a></p> <p>Resolution 254 of 2023  <a href="https://www.minsalud.gov.co/Normatividad_Nuevo/Resoluci%C3%B3n%20No.%20254%20de%202023.pdf">https://www.minsalud.gov.co/Normatividad_Nuevo/Resoluci%C3%B3n%20No.%20254%20de%202023.pdf</a></p>
<b>India</b>	<p>'Added sugars' means monosaccharides and disaccharides added to foods and beverages.</p> <p>REF: Food Safety and Standards (Labelling and Display) Regulations, 2020</p> <p>Link: <a href="http://www.fssai.gov.in/upload/uploadfiles/files/Comp_Labelling.pdf">www.fssai.gov.in/upload/uploadfiles/files/Comp_Labelling.pdf</a></p>
<b>Saudi Arabia</b>	<p>Added sugars: Sugars that are added during food processing, or are packaged as such, and include sugars (mono- and disaccharides), sugars from syrup and honey, and sugars from fruit juice or vegetable concentrates that are in excess of what would be expected from the same amount of fruit juice or vegetables that are 100% of the same type.</p> <p>REF: Technical regulation SFDA.FD/GSO 2233</p>
<b>South Africa</b>	<p>Added sugar is defined in South Africa's current Labelling Regulations, as follows:</p> <ul style="list-style-type: none"> <li>• "Added sugar" means any sugar added to foodstuffs during processing and includes but is not limited to sugars as defined by Regulations Relating to the Use of Sweeteners in Foodstuffs under the Act, honey, molasses, sucrose with added molasses, coloured sugar, fruit juice concentrate, de flavoured and/or deionised, fruit juice and concentrates thereof, high-fructose corn syrup and malt or any other syrup of various origins.</li> </ul> <p>Herewith South Africa's definition of "added sugar" under development as part of the new Draft Food Labelling Regulations.</p> <ul style="list-style-type: none"> <li>• "Added or free sugar" means any food containing monosaccharides and disaccharides, added to foods and beverages during processing and production.</li> </ul> <p>REF: Current South Africa Labelling Regulations.</p>
<b>United Kingdom</b>	<p>Added sugars includes all monosaccharides and disaccharides added to foods. For the purposes of this programme this includes:</p> <ul style="list-style-type: none"> <li>- cane sugar, brown sugar, crystalline sucrose, invert sugar, dextrose, molasses</li> <li>- sugars in honey, treacle and syrups such as malt syrup, fruit syrup, rice malt syrup, corn syrup, high fructose corn syrup, maple syrup, glucose syrup, glucose-fructose syrup</li> <li>- fructose, sucrose, glucose, lactose, hydrolysed lactose and galactose added as an ingredient</li> <li>- sugars in nectars such as coconut blossom nectar, date nectar, agave nectar</li> <li>- sugars in unsweetened fruit juices, fruit juice concentrate</li> <li>- sugars in fruit purees and jam</li> <li>- Sugar naturally present in milk products, cereals, grains, nuts, seeds and fresh, dried and other processed fruits (other than purees and juices) is not considered added sugar.</li> </ul> <p>Substances that are not included in the definition of sugar as it appears on the nutrition panel (ie not analytically sugar) are excluded, for example oligofructose and polyols.</p> <p>The definition of free sugars includes: all added sugars in any form including honey and syrups; all sugars naturally present in fruit and vegetable juices, spreads, purees and pastes, and similar products in which the structure has been broken down; all naturally occurring sugars in drinks (except for dairy-based drinks) and lactose and galactose added as ingredients. The</p>

	<p>sugars naturally present in milk and dairy products, fresh and most types of processed fruit and vegetables and in cereal grains, nuts and seeds are excluded from the definition (Swan et al. 2018).</p> <p>REF: Voluntary sugar reduction programme- UK</p>
<b>Uruguay</b>	<p>“Added sugars: Refers to the addition, during the manufacturing process, of: a. sugars; b. polysaccharide hydrolysis sugars; c. honey; d. ingredients containing the addition of any of the above.”.</p> <p>REF: Decree 272/018 - Front Labelling</p>
<b>USA</b>	<p>Added sugars are either added during the processing of foods, or are packaged as such, and include sugars (free, mono and disaccharides), sugars from syrups and honey, and sugars from concentrated fruit or vegetable juices that are in excess of what would be expected from the same volume of 100 percent fruit or vegetable juice of the same type, except that fruit or vegetable juice concentrated from 100 percent juices sold to consumers, fruit or vegetable juice concentrates used towards the total juice percentage label declaration under § 101.30 or for Brix standardization under § 102.33(g)(2) of this chapter, fruit juice concentrates which are used to formulate the fruit component of jellies, jams, or preserves in accordance with the standard of identities set forth in §§ 150.140 and 150.160 of this chapter, or the fruit component of fruit spreads shall not be labeled as added sugars.</p> <p>REF: Code of Federal Regulations General Provisions on Food Labelling Section 101.9(c)(6)(iii) at the following link:  <a href="https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/cfrsearch.cfm?fr=101.9">https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/cfrsearch.cfm?fr=101.9</a></p>

Source: Prepared with data from the responses to the CL 2023/94-FL.

According to the definitions provided, they all consider monosaccharides and disaccharides added to foods and beverages as added sugar. Items such as honey, syrups, concentrated fruit and vegetable juices are often included as part of the added sugars. In addition, several definitions explicitly mention the specific ingredients that are considered added sugars, such as syrups, maltodextrins, among others. There is also a common exclusion of sugars intrinsically present in milk, fruits, and vegetables.

Several members commented that the concept of "added sugars" could be inferred from the conditions applicable to the use of the "no added sugar" claims and additionally provided definitions and conditions that are applied to the use of the "no added sugars" claim, which are shown in table 2.

**Table 2.** Other definitions provided by Codex members, for the use of the "no added sugars" claim.

Member	Definition
<b>Chile</b>	<p>[...] in article No. 120 of the Food Health Regulations (RSA), on use and conditions for the declaration of nutritional descriptors, the concept of "added sugars" is inferred.</p> <p>Descriptor "No sugar/added sugars": if no sugar/sugars were incorporated as such or through an ingredient with added sugars. This descriptor must be accompanied by a phrase such as "this food is not calorie-free", with the same graphic characteristics of the descriptor, when used in foods to which the descriptor "free", "low" or "reduced" in calories does not apply. This descriptor does not apply to alcohol sugars, i.e. foods that use this descriptor may contain alcohol sugars. In addition, it is complemented by the definition of sugars in the RSA, which is: "Article N°383.- "The name sugars shall be understood as refined, concentrated and/or crystallized sweeteners, monosaccharides and disaccharides, for labelling purposes, which must be labeled with their specific name".</p> <p>REF: Article N°120 of the Food Health Regulations (RSA) Link Download:  <a href="https://dipol.minsal.cl/wp-content/uploads/2023/10/RSA-al-26-01-23.pdf">https://dipol.minsal.cl/wp-content/uploads/2023/10/RSA-al-26-01-23.pdf</a></p>
<b>European Union</b>	<p>In the European Union (EU), Regulation (EU) No 1169/2011 on the provision of food information to consumers provides for the mandatory nutrition declaration of (total) sugars on prepacked food and does not provide a definition of added sugars for nutrition labelling purposes. However, some definitions have been used for different purposes.</p> <p>In the EU, Regulation (EC) No 1924/2006 on nutrition and health claims made on foods refers to the nutrition claim "with no added sugars":</p> <p>"WITH NO ADDED SUGARS: A claim stating that sugars have not been added to a food, and any claim likely to have the same meaning for the consumer, may only be made where the product does not contain any added mono- or disaccharides or any other food used for its</p>

	<p>sweetening properties. If sugars are naturally present in the food, the following indication should also appear on the label: 'CONTAINS NATURALLY OCCURRING SUGARS'.</p> <p>In an EU policy document, the EU Framework for national initiatives on selected nutrients, Annex II Added sugars, the following definitions are provided:</p> <p>"In the scope of this annex, (total) sugars and added sugars are defined according to the European Food Safety Authority (EFSA): the term "sugars" covers monosaccharides and disaccharides, the term "added sugars" refers to sucrose, fructose, glucose, starch hydrolysates (glucose syrup, high-fructose syrup) and other isolated sugar preparations used as such or added during food preparation and manufacturing. Sugar alcohols (polyols) such as sorbitol, xylitol, mannitol, and lactitol, are usually not included in the term "sugars". In the scope of this annex, the term "added sugars" is additionally considered to include sugars present in honey, syrups, and fruit juices and fruit juice concentrates."</p> <p>In 2022, the European Food Safety Authority (EFSA), the EU risk assessment body, published its 'Scientific opinion on tolerable upper intake level for dietary sugars'. While this opinion is not part of EU food law, the EFSA definitions used are provided below for information:</p> <p>"Added sugars include mono- and disaccharides added to foods as ingredients during processing or preparation at home, and sugars eaten separately or added to foods at the table; free sugars include added sugars plus sugars naturally present in honey, syrups, fruit juices and fruit juice concentrates."</p>
<b>New Zealand</b>	<p>The Australia New Zealand Food Standards Code includes a definition for "added sugar(s)" for the purpose of making a voluntary "no added sugar(s)" and "unsweetened" claims about food.</p> <p>Standard 1.2.7 Nutrition, health and related claims provides information on requirements to make claims on food products. The definition for "added sugar(s)" can be found in the conditions or making a "no added sugar(s)" claim in Schedule 4 Nutrition, health and related claims and is included below.</p> <p>Schedule 4-3 Conditions for no added sugar(s) claim</p> <ol style="list-style-type: none"> <li>a) The food for sale is not an added sugar</li> <li>b) The food for sale does not contain: <ol style="list-style-type: none"> <li>i. An added sugar as an added ingredient; and</li> <li>ii. More sugars than: <ol style="list-style-type: none"> <li>A. 10 g/100g for solid food; or</li> <li>B. 7.5 g/100mL for liquid food</li> </ol> </li> </ol> </li> <li>c) The food for sale has not had the concentration of hexose monosaccharides and disaccharides in that food increased by hydrolysis of carbohydrates during the production of the food</li> <li>d) Condition (c) does not apply if the concentration of hexose monosaccharides and disaccharides in that food is not &gt; 1.5%.</li> <li>e) For the purposes of conditions (a) and (b), an added sugar means any of the following derived from any source: <ol style="list-style-type: none"> <li>i. hexose monosaccharides and disaccharides;</li> <li>ii. low energy hexose monosaccharide D-tagatose;</li> <li>iii. starch hydrolysate;</li> <li>iv. glucose syrup;</li> <li>v. maltodextrin and similar products;</li> <li>vi. a product derived at a sugar refinery (including brown sugar, molasses, raw sugar, golden syrup, treacle);</li> <li>vii. icing sugar;</li> <li>viii. invert sugar;</li> <li>ix. sugar and sugar syrup derived from plants;</li> </ol> </li> </ol>



	<ul style="list-style-type: none"> <li>x. honey;</li> <li>xi. malt;</li> <li>xii. malt extracts;</li> <li>xiii. any of the following unless the food for sale is a prescribed beverage: <ul style="list-style-type: none"> <li>A. concentrated fruit juice;</li> <li>B. concentrated vegetable juice;</li> <li>C. deionised fruit juice;</li> <li>D. deionised vegetable juice.</li> </ul> </li> </ul> <p>f) For the purposes of condition (b), an ingredient includes an ingredient of a *compound ingredient.</p> <p>g) For the purposes of condition (e), a prescribed beverage means any of the following:</p> <ul style="list-style-type: none"> <li>i. a brewed soft drink;</li> <li>ii. a formulated beverage;</li> <li>iii. a juice blend;</li> <li>iv. a fruit drink;</li> <li>v. a fruit juice;</li> <li>vi. a vegetable juice;</li> <li>vii. a water-based beverage.</li> </ul> <p>REF: The Food Standards Code is available here: <a href="https://www.foodstandards.gov.au/food-standards-code/legislation">https://www.foodstandards.gov.au/food-standards-code/legislation</a></p>
<b>Singapore</b>	<p>Singapore does not have a definition for “added sugar”. However, the criteria for the food industry to claim that a food product has “no added sugar” or is “without added sugar” is that “no free sugars or ingredients with added free sugar, honey, malt and malt extract, with the exception of sugar alcohols and sweetening substances, are added during processing”</p> <p>REF: <a href="#">Handbook on Nutrition Labelling</a> for Singapore. For the definition of “free sugars”, Singapore takes reference from the WHO’s definition.</p>

Source: Prepared with data from the responses to the CL 2023/94-FL.

On the other hand, some observers stressed the need to include a harmonised and detailed definition of “added sugars” and that these should be included in the nutrition claim so that consumers can make informed choices. Several responses provided examples of existing definitions covering different types of added sugars during food manufacturing or preparation.

In general, reference was made to the *World Health Organization (WHO) Guideline: Sugar intake for adults and children*, which defines the term free sugars as follows: “monosaccharides and disaccharides added to foods by the manufacturer, cook or consumer, and sugars naturally present in honey, syrups, fruit juices and fruits juice concentrates”.

Two observers provided publications that might be relevant to the potential work: a report that includes ten relevant definitions: [The George Institute for Global Health](#) and a paper examining the implications of adopting three different definitions of added sugars in the Australian food supply: [Assessing the Policy Implications of Different Definitions of Added Sugars: An Analysis of the Packaged Food and Beverage Supply in Australia](#).

#### **Question 2: Is the declaration of added sugars content voluntary or mandatory in your country? Please explain.**

A total of 41 responses were received to this request (31 member countries, 1 member organization and 9 observers). It was identified that 10 members have mandatory declaration of added sugars content, while 7 countries apply voluntary declaration of added sugars content. 11 member countries and 1 member organization stated that they do not apply such declaration.

Some members that apply the declaration of added sugar content on a voluntary basis indicated that the obligation to incorporate this element in the nutrient declaration is under development. Another member noted that the country does not allow the declaration of added sugar content on the nutrition information

panel, only a voluntary declaration of "no added sugar" on food labels is allowed, provided that it meets certain applicable criteria. One member indicated that the declaration of added sugars is mandatory only for prepackaged foods for Special Dietary Uses and that for all other foods it is voluntary.

One observer sought clarification as to what was meant by 'added sugars claim' in this context, and whether it was limited to the quantification of added sugars in the nutrition claim, or also to related claims, e.g. 'no added sugars' on the packaging. The intent of the paper is to address the declaration of added sugars in the nutrient declaration or nutrition panel, since "no addition" claims are already addressed in the *Guidelines for Use of Nutrition and Health Claims* (CXG 23-1997). However, the existence of a harmonized definition would serve both purposes.

**Question 3: How is the declaration of added sugars verified or planned to be verified in your country? If you have information in this regard, please detail the methodology used or to be used and provide a link to it.**

A total of 39 responses (27 member countries, 1 member organization and 11 observers) were received to this question, of which 13 member countries and 7 observers provided information on how these statements are verified.

Most of the respondents highlight the difficulty in distinguishing between added and natural sugars through analytical methods; Member countries conducting some form of verification mentioned the following approaches:

- Request for mandatory affidavit.
- Documentary evaluation and analytical methods for total sugars. If the added sugars are equal to the total sugars, analytical methods are used; otherwise, additional documentary evaluation is required.
- Detailed records and ingredient lists, supplemented by laboratory analysis in some cases.
- Review and analysis of nutritional labelling and estimation methods.
- Theoretical calculations based on the formulation of the product and documentary support.
- Verification through supply chain records and production practices.

Several observers noted that it is crucial to clearly define what is considered "added sugars" before implementing verification methods. One observer highlighted standard methods for determining lactose content in dairy products including high-performance liquid chromatography, enzymatic methods using pH differences, and quantitative chromatographic methods. The responsibility of the manufacturer to ensure accurate labelling was emphasized.

One observer explained that verification is possible with record-keeping. Noted the need for manufacturers to work hand in hand with their suppliers to determine the amount of free monosaccharides and disaccharides in the ingredients used in the formulation of a food and that, once all sources of sugars that fit the definition of added sugars have been determined, the amount of those sugars in each ingredient should be added or calculated based on the processing steps of the finished food (e.g., as a result of diluting a concentrated fruit or vegetable juice) to determine the amount of added sugars in a serving of the product containing the ingredients.

**Question 4: Do you think it is important for Codex to define the term "added sugars"? Please explain.**

Members and observers were asked whether they consider it important for Codex to define the term "added sugars". A total of 48 responses were received to this request (31 member countries, 1 member organization and 16 observers). 24 members and 11 observers were in favour of defining the term "added sugars" in Codex; 1 member country, 1 member organization and 3 observers were of the view that it was not necessary, while 6 members and 2 observers had other views regarding requests for clarification or absence of specific comments.

Those in favour of Codex defining the term "added sugars" agreed that a clear definition would help consumers make informed choices and could help reduce the consumption of added sugars. In addition, that a harmonized global definition would promote fair trade practices by establishing a common criterion and thus facilitate international trade.

Members and observers who did not support establishing the definition of the term "added sugars" mainly noted the lack of significant differences in health effects between "added sugars" and "free sugars". They mention that there is no convincing scientific justification for distinguishing between different types of sugars, since all sugars provide the same amount of calories and are digested in the same way by the human body regardless of their origin.



In general, there is strong support for Codex to define the term "added sugars", but there is also a need to clarify the purpose and methodologies of verification to ensure its effectiveness and applicability.

**Question 5: If your answer to question 4 is YES, which committee do you think, under its mandate, should develop such a definition? Please explain.**

In order to determine the direction of the work should it be adopted, and taking into account that the mandates of the CCFL and the CCNFSDU might overlap in some respects, members and observers were consulted on which committee they considered most appropriate to develop the definition of added sugars and based on this to make a recommendation.

Table 3 details the mandate of both committees for reference:

**Table 3.** Comparison of CCFL and CCNFSDU terms of reference.

<b>Codex Committee on Food Labelling (CCFL)</b>	<b>Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU)</b>
<p>(a) to draft provisions on labelling applicable to all foods;</p> <p>(b) to consider, amend if necessary, and endorse draft specific provisions on labelling prepared by the Codex Committees drafting standards, codes of practice and guidelines;</p> <p>(c) to study specific labelling problems assigned to it by the Commission; and,</p> <p>(d) to study problems associated with the advertisement of food with particular reference to claims and misleading descriptions.</p>	<p>(a) to study specific nutritional problems assigned to it by the Commission and advise the Commission on general nutrition issues;</p> <p>(b) to draft general provisions, as appropriate, concerning the nutritional aspects of all foods;</p> <p>(c) to develop standards, guidelines or related texts for foods for special dietary uses, in cooperation with other committees where necessary; and,</p> <p>(d) to consider, amend if necessary, and endorse provisions on nutritional aspects proposed for inclusion Codex standards, guidelines and related texts.</p>

Source: Codex Alimentarius.

A total of 42 responses to this question were received (29 member countries and 13 observers). Different opinions were expressed on which committee should develop the definition of added sugar, so it is identified as a complex issue. The different views of Codex members and observers will then be discussed.

The majority of respondents (15 members and 5 observers) consider that the term "added sugars" should be defined within the framework of the CCFL. The reasons that supported these opinions were:

- The primary responsibility for formulating the definition should lie with the CCFL, given its specialization in food labelling matters to maintain clarity and efficiency in the development process, while maintaining the CCFL's specific focus on the complexities of food labelling standards.
- The CCFL has already worked on definitions of other nutrients and terms used in food labelling, which strengthens its ability to handle the definition of added sugars.
- The CCFL has experience in developing guidelines on the nutrition information that must be included on food labels and the work relates directly to the information that must be provided on labels.
- This committee is best suited to develop a definition that is clear, concise, and easy to understand by consumers.

Many responses agree that the development of the definition of added sugar should involve collaborative efforts between the two Committees, CCFL and CCNFSDU. It was stressed that, while the CCFL should develop such a definition, it is important that the CCNFSDU be consulted, and its views taken into account during the course of the potential work.

On the other hand, 9 members and 3 observers were of the opinion that the CCNFSDU is the most appropriate Committee to lead the development of the definition arguing the following:

- This is adequately covered by the mandate of the CCNFSDU "(b) to draft general provisions, as appropriate, concerning the nutritional aspects of all foods;".
- Added sugars are a nutritional aspect of food. Expertise in nutrition is important given the number of technical challenges and barriers that developing a definition of "added sugars" presents.
- The intent of the definition is related to noncommunicable diseases (NCDs).

- The definition needs to be framed taking into account its nutritional aspect, as well as the composition of foods/ingredients and their contributions to added sugars compared to free and total sugars.

It was also noted that the CCFL should generate the request for the establishment of the definition by providing clear guidance to the CCNFSDU, including guidance on its intended use and the Codex document in which the definition would be located.

4 members and 2 observers were of the opinion that the definition could be developed by either the CCFL or CCNFSDU committees. 1 member and 3 observers had other views, regarding requesting more information and on the need to address specific analytical methods for added sugars, proposing that this be an issue that could be addressed by the CCMAS.

**Question 6: Do you think Codex should include added sugar on the nutrient declaration list? If yes, should it be mandatory or voluntary? Please explain.**

A total of 48 responses to this question were received (31 member countries, 1 member organization and 16 observers). Different views were expressed on this issue without being able to determine a clear preference.

13 member countries and 7 observers were of the opinion that Codex should include added sugar in the nutrient declaration list on a mandatory basis, noting that providing clear and accurate information on the content of added sugars is crucial for public health, as it helps consumers make informed choices, thereby reducing excessive consumption of added sugars and preventing chronic diseases such as obesity and diabetes. Harmonization of nutrition labelling at the global level would contribute to these public health goals, supporting the World Health Organization's recommendations on reducing the consumption of free sugars and that it would also increase the usefulness of this information for policymakers, for example, for use in front-of-pack nutrition labelling systems or other policies that might include added sugars in their nutrition profile criteria. In addition, it was suggested that improving transparency and understanding of sugar content in foods, through mandatory labelling, could incentivise manufacturers to reformulate their products to reduce added sugars.

7 member countries and 3 observers consider that Codex should include added sugar in the nutrient declaration list on a voluntary basis. This approach would allow countries to tailor regulations to their specific needs and national contexts and avoid potential trade disruptions. It was also mentioned that mandatory implementation could be complex and costly for the food industry.

4 member countries, 1 member organisation and 4 observers were of the opinion that added sugar should not be included in the nutrient declaration list, noting the lack of clear benefits, the potential for consumer confusion as the inclusion of added sugars does not offer additional information relevant to consumer health and that current information on carbohydrates and total sugars is sufficient.

8 member countries and 2 observers did not take a position on any option, indicating that it is necessary to consider the need for a clear definition and precise methodologies before deciding. They noted that the inclusion of added sugars should be carefully evaluated to avoid confusing or misleading information for consumers.

**Question 7: Do you see any barriers or limitations to the development of the definition of "added sugars" under the CCFL? Please explain.**

A total of 47 responses to this question were received (31 member countries, 1 member organization and 15 observers).

61% of respondents (18 member countries, 1 member organization and 13 observers) consider that there are barriers or limitations to the development of the definition, while only 25% of respondents (12 member countries, 1 observer) mentioned that there were no limitations.

Most of the responses identified as the main barrier or limitation the lack of an analytical methodology that can differentiate added sugars from total sugars, highlighting the need for close collaboration with the CCMAS to address this issue. In addition, the following aspects were mentioned:

- Differences between countries over definitions may hinder the harmonization process and the lack of global agreement on the definition of "added sugars" and the use of other terms.
- Consider "added" versus "free" sugars and how they fit into the definition.
- Diversity of ingredients with sugars that can fall into the definition.
- Various sources of sugar, complicating the differentiation between natural and added sugars.
- Diverse regulatory frameworks and a variety of understandings about what added sugars are.

- Consumer understanding of complex concepts.
- Absence of an NCV-NCD based on scientific studies.
- The introduction of a new differentiated nutritional labelling item is not justified.
- Treatment of different types of sugar, such as low-energy sugars.
- Industry concerns about the feasibility of implementing the definition.

**Question 8: Provide additional suggestions that Codex should take into consideration regarding the definition of "added sugars".**

Members and observers were asked to provide additional suggestions to be taken into consideration regarding the development of the definition of "added sugars". 37 responses to this question were received from 29 members and 8 observers.

A The key aspects mentioned in the responses are summarized below:

- Develop a non-exhaustive list of added sugars to facilitate understanding, implementation, and monitoring.
- The definition should be aligned with the *Codex Guidelines on Nutrition and Health Claims* (CXG 23-1997)
- Clearly define the purpose of the definition to promote consumer understanding, facilitate labelling, and support public health goals.
- Ensure that the definition is based on robust scientific evidence and recent data.
- Consider the health impact of different types of sugars and align the definition with public health goals.
- Accompany implementation with educational initiatives to inform consumers and stakeholders about the definition.
- Consider specific exclusions such as ingredients containing natural mono and disaccharides, which do not intentionally increase the sugar content.
- Include sugars generated in enzymatic processes in nutritional labelling, as they have a physiological effect similar to added sugars.
- Seek international harmonization to facilitate trade and create consistency in labelling requirements.
- Collaborate with the CCMAS to develop quantification methods to support implementation.

**APPENDIX II****PROJECT DOCUMENT FOR NEW WORK ON ESTABLISHMENT OF A DEFINITION OF ADDED SUGARS****1. PURPOSE AND SCOPE OF THE NEW WORK**

The purpose and scope of the proposed work is to develop a definition of the term "added sugars" for labelling purposes as well as to consider the inclusion of the added sugars declaration in section 3.2 on listing of nutrients of the *Guidelines on Nutrition Labelling* (CXG 2-1985) to support governments in implementing regulations on nutrition labelling, ensuring that information on added sugars is clear, thus promoting greater transparency and consumer protection and at the same time accurate, harmonized, and applicable in international trade.

**2. RELEVANCE AND TIMELINESS**

The *Guidelines on Nutrition Labelling* (CXG 2-1985) require the declaration of total sugars as part of the nutrient declaration, without distinguishing between naturally occurring sugar and sugar added during the production or preparation of food and beverages. However, the WHO recommends implementing measures at the global level to reduce the consumption of sugars because excessive consumption of added sugars has been linked to obesity, diabetes and other chronic diseases.

The establishment of a definition of "added sugar" in the Codex Alimentarius is crucial, as there is growing interest from both consumers and national regulators in the labelling of these components and their inclusion in the nutrition claim. The absence of a clear definition of added sugars complicates CCFL's efforts to harmonize nutrition labelling globally. A harmonized definition would not only make it easier to assess their impact on public health but would also reduce the risk of misinterpretations that could confuse consumers, contributing significantly to improving the clarity and consistency of nutrition labelling around the world. It is vital to provide consumers with accurate information about the sugar content in foods, allowing them to make more informed choices and encouraging manufacturers to follow recommendations to reduce the amount of added sugars in their products. Without a clear definition of added sugars, consumers face difficulties in making informed decisions about the amount of sugars they are consuming. In addition, a clear and uniform definition of added sugars will facilitate the harmonization of regulations and policies related to labelling and nutrition information on foods, thereby improving consumer protection and promoting healthy eating.

This initiative is in line with the agreement of the 83rd Session of the Executive Committee reflected in REP22/EXEC2 para. 154: "*v. At the request of the WHO representative, agreed to request that Codex committees, when prioritising and undertaking work on new standards or the review of standards and guidelines relating to composition of foods, to have due regard to on-going global efforts to achieve health and nutrition related goals through reducing noncommunicable diseases (NCD) risk factors such as sodium intake.*"

**3. MAIN ASPECTS TO BE COVERED**

The work will include the development of a definition of the term "added sugars" as well as considering the inclusion of the declaration of added sugars in section 3.2 on Listing of nutrients of the *Guidelines on Nutrition Labelling* (CXG 2-1985).

It is proposed that the work covers at least the following aspects:

- i. Develop a harmonized definition of the term "added sugars" based on available scientific information.
- ii. Revise the *Guidelines on Nutrition Labelling* (CXG 2-1985) to incorporate the definition of added sugars in section "2. Definitions" and consider the inclusion of this ingredient in the nutrient declaration in section "3.2 Listing of nutrients".
- iii. Review the *Guidelines for Use of Nutrition and Health Claims* (CXG 23-1997), with respect to claims of no added sugars in order to determine the need for subsequent amendments to the adopted definition to ensure consistency between the two purposes (claims and nutrition facts panel statement).
- iv. Determine whether the definition of "added sugars" applies only to their quantification in the nutrition facts or also to claims such as "no added sugars" on packaging.

**4. ASSESSMENT AGAINST THE CRITERIA FOR ESTABLISHMENT OF NEW WORK PRIORITIES****General criterion**

**Consumer protection from the point of view of health, food safety, ensuring fair practices in the food trade and taking into account the identified needs of developing countries.**

Simplified nutrition information may have a role to play in facilitating a greater understanding of the nutritional content of foods by consumers. This can also help guide consumers toward healthier eating choices. Simplified nutrition information, especially on the front of the package, can also encourage food manufacturers to reformulate their food products to obtain a profile that will improve the nutritional quality of foods available to consumers. Improving people's nutrition through a food supply with healthier choices would improve the risk profile for a number of noncommunicable diseases worldwide.

**Criteria applicable to general matters**

***(a) Diversification of national legislations and apparent resultant or potential impediments to international trade***

The lack of a harmonized definition of "added sugars" has led to different countries adopting their own interpretations, complicating comparison and compliance with food regulations. This disparity can create trade barriers, generate confusion among consumers, and difficulties for producers seeking to access global markets resulting in delays in the import and export of products, as well as additional costs for companies that must adapt their labelling and formulas to comply with multiple national regulations. Therefore, it is crucial to move towards a common definition that facilitates international trade and ensures greater consistency and transparency in nutrition information at the global level.

In addition, it has been identified that "added sugars" are not chemically different from sugars that are naturally present in foods such as fruits and milk, making it difficult to distinguish between added sugars and natural sugars using analytical methods. Therefore, there are important considerations regarding standard methods for testing for added sugars in foods and beverages, as well as ensuring regulatory compliance.

***(b) Scope of work and establishment of priorities between the various sections of the work***

Conduct a revision of the *Guidelines on Nutrition Labelling* (CXG 2-1985) and the *Guidelines for Use of Nutrition and Health Claims* (CXG 23-1997), in order to incorporate a definition of "added sugars" as appropriate.

***(c) Work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies)***

Some works have been identified that could serve as a reference for the development of the proposal, among which the following can be mentioned: [Guideline: Sugars intake for adults and children](#): World Health Organization, 2015; Code of Federal Regulations. [General Provisions on Food Labeling](#) Section 101.9(c)(6)(iii). Food Drug Administration (FDA); [Scientific Opinion on Tolerable upper intake level for dietary sugars](#). The European Food Safety Authority (EFSA). Panel. 2021.

***(d) Amenability of the subject of the proposal to standardization***

Standardizing the definition of "added sugars" is essential to ensure consistency and clarity in international food regulation. Codex Alimentarius standards, referred to in the WTO Agreement on the Application of Sanitary and Phytosanitary Measures (SPS), play a crucial role in resolving trade disputes. A standardized definition would help reduce non-tariff barriers, protect consumers with accurate labels, and allow for a scientific justification for stricter measures taken by countries, in line with the SPS Agreement.

***(e) Consideration of the global magnitude of the problem or issue***

Promoting healthier diets for consumers and encouraging manufacturers to improve the nutritional quality of the food supply are areas where proper guidance could have a significant impact globally.

**5. RELEVANCE TO CODEX STRATEGIC OBJECTIVES**

The proposed new work is in line with the Codex Alimentarius Commission's mandate to develop international standards, guidelines and other recommendations for protecting the health of consumers and ensuring fair practices in food trade. The new work proposal will contribute to the advancement of Strategic Objectives 1 and 4, as described below.

***Strategic Goal 1: Address current, emerging and critical issues in a timely manner***

The inclusion of a clear definition of added sugars in the *Guidelines on Nutrition Labelling* can facilitate the harmonization of international regulations and standards. This simplifies international food trade by reducing technical barriers to trade and promoting coherence between the policies and regulations of different countries.

Additionally, clear information about the content of added sugars on food labels can help consumers make healthier choices and reduce their consumption of added sugars. This can have a positive impact on public health by helping to prevent diet-related diseases.

***Strategic Goal 4: Facilitate the participation of all Codex Members throughout the standard setting process***

Bringing this issue to the CCFL gives all Codex members a solid basis to participate in discussions and decisions related to nutrition labelling. This ensures that all members have the opportunity to contribute and express their opinions effectively, thus promoting an equitable and transparent decision-making process.

By clearly defining the term "added sugars" in the nutrition labelling guidelines, a common basis of understanding is established among all Codex members. This ensures that there is transparency in the information provided on food labels and that consumers can easily understand the added sugar content in the products they consume.

**6. RELATION BETWEEN THE PROPOSAL AND OTHER EXISTING CODEX DOCUMENT**

The development of the definition of added sugars relates to the *Guidelines on Nutrition Labelling* (CXG 2-1985) and the *Guidelines for Use of Nutrition and Health Claims* (CXG 23-1997). These guidelines are applicable horizontally to all pre-packaged foods.

**7. REQUIREMENT FOR AND AVAILABILITY OF EXPERT SCIENTIFIC ADVICE**

None identified at this stage. There will be an opportunity to consult throughout the process with the relevant bodies if necessary.

**8. NEED FOR TECHNICAL INPUT TO THE STANDARD FROM EXTERNAL BODIES**

None identified at this stage. There will be an opportunity to consult throughout the process with the relevant bodies if necessary.

**9. PROPOSED TIMELINE**

If approved by the Codex Alimentarius Commission (CAC47) to be held in November 2024, the work is expected to take at least two sessions to complete.