

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 13

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-eighth Session

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SUGAR LABELLING – DEFINITION FOR “ADDED SUGARS”

(Comments from European Union, Kenya, Madagascar, Republic of Korea, United Republic of Tanzania)

European Union

European Union Competence

European Union Vote

The European Union (EU) would like to thank Costa Rica for the preparation of the Discussion paper on the establishment of a definition of added sugars (CX/FL 24/48/13).

The EU is not in favor of establishing a new definition of “added sugars”, to revise the *Guidelines on Nutrition Labelling* (CXG 2-1985) to add the definition of “added sugars” in section 2 of the Guidelines, and to include “added sugars” in the nutrient declaration in section 3.2 of the Guidelines.

In order to be meaningful, any definition of “added sugars” for nutrition labelling purposes should indeed refer to “free/added sugars”, to reflect actual health effects as the health effects of “added sugars”¹ and “free sugars”² do not differ. According to the opinion of the European Food Safety Authority (EFSA)³:

“An Upper Limit or a safe level of intake for either total, added or free sugars could not be established [...] The intake of added and free sugars should be as low as possible in the context of a nutritionally adequate diet. Decreasing the intake of added and free sugars would decrease the intake of total sugars to a similar extent.”

“The intake of dietary sugars is a well-established hazard in relation to dental caries in humans. However, a level of (total/added/free) sugars intake at which the risk of dental caries is not increased over the range of observed intakes could not be identified.”

“There is evidence for a positive and causal relationship between the intake of added and free sugars and risk of some chronic metabolic diseases. [...] However, a level of added/free sugars intake at which the risk of chronic metabolic disease is not increased over the range of observed intakes could not be identified.”

¹ 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 (EFSA: Scientific Opinion on the tolerable upper intake level for dietary sugars. EFSA Journal 2022;20(2):7074, 337)

² Free sugars include added sugars plus sugars naturally present in honey, syrups, fruit juices and fruit juice concentrates (Source: see footnote 3)

³ EFSA: Scientific Opinion on Dietary Reference Values for carbohydrates and dietary fibre. EFSA Journal 2010; 8(3):1462 [77 pp.]. EFSA Journal 2010; 8(3):1462

Furthermore, given that “added sugars” and “free sugars” in prepacked foods on the market are in quantity similar to the quantity of total sugars, with the only exception of the sugars naturally present in milk and in whole/intact fruits and vegetables⁴, the EU is not convinced that introducing a new nutrition labelling item would be justified to differentiate between total sugars and added/free sugars.

Kenya

Comment: Kenya supports the initiation of work as proposed in the discussion papers except the discussion paper on Labelling of alcoholic beverages. Further, we agree with the proposal to withdrawal discussion paper on TFAs.

Rationale: Kenya recognizes the need to have appropriate labelling of alcoholic beverages, but we seek guidance whether the ToRs for CCFL includes labelling provisions of alcoholic beverages. We also note that there is no corresponding Codex commodity Committee on alcoholic beverages hence seeking clarification from Codex on its role, if any, in alcoholic beverages.

Madagascar

Champ d'application

Le CCFL48 est invité à examiner le document de projet présenté à l'annexe II, après recueil et synthèse des renseignements reçus auprès des membres à travers la lettre circulaire CL 2023/94–FL. L'objet et l'étendue du travail proposé dans le document de projet est d'élaborer une définition du terme « sucres ajoutés » à des fins d'étiquetage et d'envisager l'inclusion de la déclaration sur les sucres ajoutés dans la section 3.2 sur la liste des nutriments des Directives concernant l'étiquetage nutritionnel (CXG 2-1985).

Positions

Comme Madagascar ne dispose pas d'une définition de sucres ajoutés, Madagascar soutient le travail sur l'établissement d'une définition harmonisée des « sucres ajoutés » et tout autre travail y afférent au vu de la lecture du document de projet.

Madagascar propose les définitions et points suivants :

- Les sucres ajoutés concernent les sucres qui sont ajoutés lors de la transformation des aliments et des boissons. Cela inclut des formes de sucre comme le saccharose (sucre de table), le sirop de maïs à haute teneur en fructose, le miel, et d'autres édulcorants caloriques ajoutés pour sucrer l'aliment.
- Allégations nutritionnelles : Si un produit utilise des allégations comme « faible en sucre », « sans sucre », ou « sans sucres ajoutés », il doit se conformer à des seuils spécifiques définis par la législation. Par exemple :
 - Sans sucre : Signifie que le produit contient moins de 0,5 g de sucres pour 100 g ou 100 ml.
 - Sans sucres ajoutés : Le produit ne contient aucun sucre ajouté, ni édulcorant calorique.
 - Faible teneur en sucre : Le produit contient au maximum 5 g de sucres pour 100 g ou 2,5 g pour 100 ml.

Justifications

La déclaration de la teneur en sucres ajoutées dans les produits transformés est importante car elle contribue à la santé publique en fournissant une information transparente et en aidant les consommateurs à adopter des habitudes alimentaires plus saines.

Republic of Korea

The Republic of Korea submits the following proposal concerning the definition of "added sugars."

In accordance with Korean regulations, there is currently no established standard for "added sugars." However, recognizing that the definition of "added sugars" varies across countries, we support the development of an

⁴ Total sugars comprise free (including added) sugars, plus sugars naturally present in milk and in intact fruits and vegetables. See EFSA infographic available at: <https://www.efsa.europa.eu/en/infographics/sugar-consumption-and-health-problems>

internationally harmonized definition.

Given the lack of an analytical method to distinguish "added sugars" from "free sugars" (those naturally present in foods or raw materials), the labeling of "added sugars" should remain voluntary rather than mandatory.

United Republic of Tanzania

COMMENT

- i. The URT supports the recommendation 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):
 - a. The URT recommends that the definition of "added sugars" to be incorporated in *CXG 23-1997 & CXG 2-1985*
 - b. The URT support the inclusion of the added sugar in the list of ingredients
 - c. The URT recommends that the declaration of added sugars should be voluntary meaning that it should be declared only when it has been included

Justification:

The work would reduce the risks of misinterpretations which could mislead the consumer