

END THE **SUGAR-COATING**

A CHOICE REPORT INTO ADDED
SUGAR LABELLING IN AUSTRALIA

INTRODUCTION

When was the last time you ate muscovado, panela, rapadura or turbinado? These are some of the more exotic names consumers will see on labels for a basic pantry staple: sugar.

In Australia, many people are over-consuming added sugar and may not even realise it. Government intervention is necessary to give Australians tools to make better choices about their food.

Fruit, vegetables and dairy products contain intrinsic sugars and have the added benefits of vitamins, other nutrients and dietary fibre. However, sugars added to foods and drinks are devoid of these nutritional benefits and add unnecessary kilojoules to a diet.

An estimated 74% of packaged foods in the United States contain added sugars and the situation in Australia is likely similar.¹ International health bodies and experts recommend limiting consumption, but in Australia over half the population is exceeding the World Health Organisation's (WHO) recommendation to limit added sugar consumption to no more than 10% of daily energy intake.²

Added sugars provide empty kilojoules, or kilojoules with little or no associated nutrients.³ Excess intake of added sugar is associated with an increased risk of type 2 diabetes, obesity, dental caries and cardiovascular disease.⁴

Consumers in Australia have no clear way of knowing how much sugar has been added to a food. The Nutritional Information Panel (NIP) displays total sugars and, while the types of sugars are included in the ingredients list, there are over 43 different names for sugars making identifying added sugar a time-consuming and difficult process. Right now, consumers are struggling to

identify if a product has added sugar, let alone how much added sugar is included.

The results from this report show that by requiring labels to list added sugar, Australians would have the tools they need to improve their diet.

This report looks at six simple food swaps an individual could make throughout the day. These swaps show that an individual could remove 26 teaspoons of unnecessary sugar from their diet in a day and up to 38.3 kilograms of unnecessary sugar over the course of a year.⁵

The solution is simple. Label added sugars clearly, following the precedent set by the US and Canada. This is a necessary step to allow Australians to take their health in their own hands and make informed choices.

WHY ADDED SUGAR?

In 2015, the WHO released a recommendation that no more than 10% of total daily energy intake should come from added sugars. For an average adult intake of 8,700 kilojoules, this equates to 52 grams or 13 teaspoons of added sugar. The WHO made a further conditional recommendation that added sugar intake be reduced to below 5% of total energy intake. This recommendation was made on the basis that added sugars increase overall energy intake and may also reduce an individual's intake of foods containing more nutritionally adequate kilojoules, leading to an unhealthy diet, weight gain and increased risk of non-communicable diseases.^{6,7} Correspondingly, the 2013 Australian Dietary Guidelines (ADGs) advises Australians to limit their intake of foods and beverages containing added sugar, especially all sugar-sweetened drinks, sports drinks, confectionery, biscuits and cakes.⁸

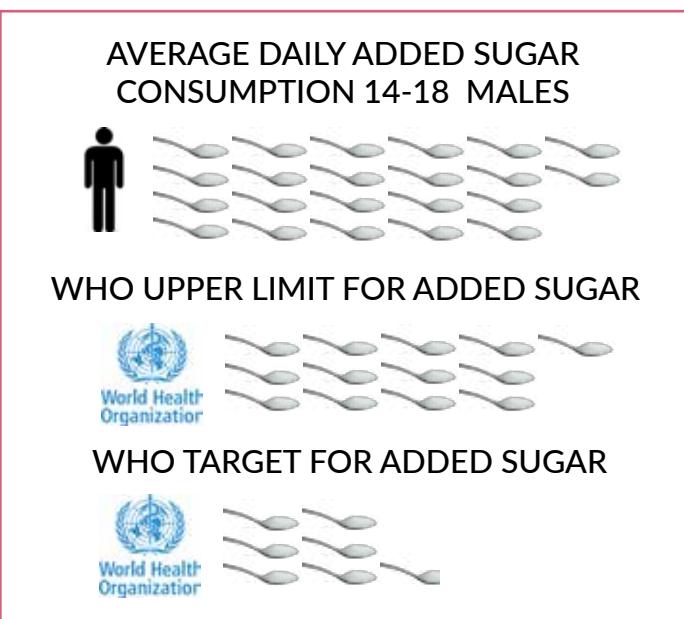
Contrary to the advice from health bodies, in 2011-12 Australians consumed on average 60 grams or 14 teaspoons of added sugar a day. This equates to almost 22 kilos of added sugar a year.⁹



The Australian Health Survey found that over half of Australians exceed the WHO's recommendation to reduce added sugar to 10% of daily energy intake.¹⁰ And the most affected groups? Children and teenagers. Close to three quarters of 9-13 and 14-18 year olds usually derive 10% or more of their dietary energy intake from added sugars. For 14-18 year old males, the average consumption of added sugar is 22 teaspoons per day and the top 10% consume at least 38 teaspoons per day, equivalent to the sugar in almost 4 cans of coke.^{11 12} Products such as sugar-sweetened beverages, breakfast cereal, spreads, cakes, biscuits, muesli bars and ready-made sauces and meals were the primary contributors to added sugar in their diets.¹³ The WHO's additional recommendation of limiting added sugar to 5% is exceeded by nine out of ten Australians.¹⁴

The situation is also concerning for Aboriginal and Torres Strait Islander people who are consuming on average 75 grams or 18 teaspoons of added sugar per day. This is 15 grams, almost 4 teaspoons, more than non-Indigenous people.¹⁵ Similarly, children and teenagers are the worst affected age-groups.

The over-consumption of added sugar presents a serious health risk to Australia. Diets high in added sugar may displace nutritious foods and increase energy-dense, nutrient poor foods, associated with weight gain and dental caries (tooth decay).¹⁶



This means that if you eat too many foods high in added sugar, it is difficult to get all the nutrients you need in a day while staying within your kilojoule intake. This results in a situation where Australians can be overfed and undernourished.

One of the major issues with added sugar consumption is tooth decay. Frequent consumption of foods and drinks high in added sugars is a major risk factor in dental caries.¹⁷ In 2014-15, \$9.564 billion was spent on dental services in Australia. This is up from \$6.1 billion in 2007-08.¹⁸ Sugars provide food for the bacteria that dissolve tooth enamel and as sugar consumption increases, so do cavities. This damage is irreparable; the tooth cannot repair itself and individuals are left with life-long problems which require fillings, root canal work or extractions.¹⁹ This is not just a problem for adults; dental issues can start at a young age with the recent National Child Oral Health Study in 2012-14 finding that one third of Australian children have experienced tooth decay by the age of 5-6 years in their deciduous (baby) teeth, increasing to 46% of children by the age of 9-10 years.²⁰ Staggeringly last year over 5,200 Victorian children aged 0-14 years were hospitalised due to dental conditions.²¹

Intrinsic vs. added sugar.

Intrinsic sugars include the sugars found in nutrient-rich foods such as milk and intact fruits and vegetables. These foods are recommended in the Australian Dietary Guidelines and their intrinsic sugars are part of a healthy, balanced diet. However, added sugars are the major source of sugar in the Australian diet and have damaging health effects.²² The WHO calls these sugars free sugars and they include monosaccharides such as glucose and disaccharides such as sucrose, added to foods and beverages by the manufacturer, cook or consumer, as well as sugars naturally present in honey, syrups, fruit juices and fruit juice concentrates.²³ When we refer to added sugars, we refer to the WHO's definition of added sugar (which they term free sugars).

THE PROBLEM WITH ADDED SUGAR AND FOOD LABELS

Consumers have no clear way of knowing how much sugar has been added to a food by looking at the label. Information on sugar is communicated to consumers in two ways; through the listing of total sugars in the Nutritional Information Panel (NIP) and through the ingredients list. Neither of these labelling elements give consumers the ability to easily determine what and how much added sugar is in their food.

While consumers can look to the ingredient list to determine whether a product contains added sugar, this is not an easy task. The individual listing of different types of sugar reduces consumers' ability to quickly assess the overall contribution of this ingredient in the food. Making it more difficult is the different number of names for sugar.

Consumers also do not understand that the ingredients are listed in order of ingoing weight. A 2017 CHOICE survey found that only 34% of consumers knew that ingredient lists are ordered this way.²⁴ Two out of three consumers are missing the message that if sugar appears toward the beginning of the ingredient list, it is one of the main ingredients in the product.

Consumers could look to the amount of total sugar in a product on the NIP. However, some foods contain milk, fruit or vegetables which due to their intrinsic sugars contribute to a higher total sugar amount listed in the NIP. The risk of the lack of differentiation between intrinsic and added sugar is that a consumer may misinterpret a nutrient-rich food with intrinsic sugars, such as plain yoghurt, as unhealthy due to focusing on the total sugar amount. This creates a disconnect between food labels and health advice as the ADGs recommend that individuals consume nutrient-rich foods in the five food groups but they also recommend limiting foods and drinks with added sugar.^{25 26}

With so many terms disguising added sugar and total sugar information sending mixed health messages, it is evident that current labels are failing consumers.

FOOD SWAPS THAT CUT ADDED SUGAR

Products like cakes, chocolates or soft drinks clearly contain added sugar. But it can be extremely difficult to determine how much added sugar is in everyday products such as muesli bars, cereals and frozen meals. Small amounts of added sugars consumed throughout the day can add up and contribute empty kilojoules to an individual's diet.

Words used for added sugar

- Agave nectar/syrup
- Barley malt
- Beet sugar
- Blackstrap molasses
- Brown sugar
- Cane sugar
- Carob syrup
- Caster sugar
- Coconut sugar
- Coffee sugar crystals
- Confectioner's sugar
- Corn syrup
- Date sugar/syrup
- Demerara
- Dextrose
- Evaporated cane juice
- Fructose
- Fruit juice
- Fruit juice concentrate
- Glucose
- Golden syrup
- Grape sugar/syrup
- High-fructose corn syrup (HFCS)
- Honey
- Icing sugar
- Invert sugar
- Lactose
- Maltose
- Maple syrup
- Molasses
- Muscovado
- Palm sugar
- Panela
- Powdered sugar
- Rapadura
- Raw sugar
- Rice syrup
- Sucrose
- Sugar
- Treacle
- Turbinado
- White sugar.

CHOICE has looked at commonly eaten items throughout the day to see how much added sugar is hiding in these products. Calculating the added sugar in a product isn't easy. We've had to refer to research papers and delve into nutritional databases. We could only analyse the added sugar amount where ingredient lists told us the percentage composition of ingredients in the product that contain sugar. For example, if a product's only intrinsic sugars come from apricots and apricot makes up 10% of the product, we can determine the amount of sugar in the apricot using a nutritional database and subtract this from total sugars to determine the amount of added sugar.

For an ingredient that consumers are supposed to actively reduce, it is surprisingly difficult to find out if sugar is in your food.

BREAKFAST

Breakfast is a serial offender when it comes to added sugar. Many cereals, breakfast biscuits, liquid breakfasts and sweetened yoghurts contain high amounts of added sugar. But if consumers knew just how much sugar was added to their daily

breakfast routine, they could make substantial reductions to their added sugar consumption.

Cereal swap

The popular Kellogg's Nutri-Grain is sold as the athlete's breakfast. The iron-man association and claims around protein and calcium create the impression that this is a healthy breakfast cereal. Despite this, the cereal is high in added sugar. By swapping from a 40g serve of Nutri-Grain (which is the suggested serve size and likely smaller than what people actually consume) to 40g of a cereal with no added sugar such as Uncle Tobys Weeties, consumers could remove 10.7 grams or 2.7 teaspoons of unnecessary sugars from their day.

In 2014, Kellogg's Nutri-Grain had the 2nd highest grocery value in the breakfast cereal category. 7,954 tonnes of Nutri-Grain were sold in 2014 which equals almost 27.4 million 290g boxes sold.²⁷ With each 290g box containing 77.43 grams of added sugar, this means that over 2.12 million kilograms of added sugar are being consumed each year just through Nutri-Grain.

The image shows two cereal boxes side-by-side. On the left is a box of Kellogg's Nutri-Grain Stars cereal. It features a dark blue header with '4 HEALTH STARS' and 'SOURCING PROTEIN AND FIBRE'. The main body is red with the 'NUTRI-GRAIN' logo in large white letters. A circular callout bubble on the bottom left states: 'CONTAINS 10.7g OF SUGAR, ALMOST ALL OF IT IS ADDED SUGAR.' On the right is a box of Uncle Tobys Weeties cereal. It has a yellow header with '700g FAMILY PACK'. The main body is red with the 'Weeties' logo. A circular callout bubble on the bottom left states: 'CONTAINS 0.16g OF SUGAR, NONE OF IT IS ADDED SUGAR.' A white curved arrow points from the Nutri-Grain box towards the Weeties box.

**SAVE 10.7 GRAMS OR 2.7 TEASPOONS
OF UNNECESSARY SUGAR IN ONE SWAP.**

*SUGAR BASED ON 40G SERVING SIZE LISTED ON NUTRI-GRAIN PACK.

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Yoghurt swap

Yoghurt is often marketed as a healthy, calcium-rich product. Yet some of the products in the supermarket fridge are closer to a “dairy-based dessert” than a health food. Yoghurts will always have an intrinsic sugar content due to the lactose. While lactose is a sugar, yoghurt comes with the benefits of calcium, protein, vitamins, minerals and probiotics. However a lot of yoghurt products are filled with additional sugar which you wouldn’t know by just looking at the label.

By swapping a serve (160g) of Gippsland Raspberry and Coconut Twist Yoghurt with an equivalent amount of Gippsland’s Organic Natural Yoghurt and adding coconut flakes and fresh raspberries, consumers could remove 15.3 grams or 3.8 teaspoons of unnecessary sugar.

SNACKS THROUGHOUT THE DAY

In their sample meal plans, the Australian Dietary Guidelines recommend that Australians snack on nuts, yoghurt, fruit salad, crispbread. For products that contain fruit or milk, it is difficult for a consumer to differentiate between intrinsic and added sugars.

Snack bar swap

Cereal bars, muesli bars, oat slices, nut bars and raw bars generally have a healthy image. Appealing, earth-toned packaging, images of wholegrains, nuts and fruit and claims of “no artificial colours and flavours” are standard. A 50g Go Natural Macadamia Divine bar contains 18.5 grams of total sugar with added raw sugar, honey and glucose. In comparison, Emma & Tom’s 40g Life Bar Cacao and Orange contains a similar amount of total sugar at 15.8 grams but these sugars are found naturally within the ingredients and this product has no added sugars. If consumers made this swap they could remove 17.8 grams of unnecessary sugar or 4.4 teaspoons a day.

Fruit swap

Some fruit snacks will leave consumers with few nutritional benefits and more risk of tooth decay. Golden Days Apricot Bites are found in the health food aisle in the supermarket but only 50% of the product is apricots, with sugar and glucose syrup coming in as the next main ingredients. By swapping 40g of Apricot Bites for 40g of dried apricots consumers could cut out 13.1 grams or 3.3 teaspoons of sugar a day.

SWAP 160G GIPPSLAND RASPBERRY & COCONUT YOGHURT

CONTAINS 27.3g OF SUGAR, AROUND 56% OF IT IS ADDED SUGAR.

FOR 160G GIPPSLAND PLAIN ORGANIC YOGHURT + RASPBERRIES & COCONUT

CONTAINS 13.3g OF SUGAR, NONE OF IT IS ADDED SUGAR.

SAVE 15 GRAMS OR 3.8 TEASPOONS OF UNNECESSARY SUGAR IN ONE SWAP.

*SUGAR BASED ON 160G SERVING SIZE LISTED ON PACK.

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SWAP GO NATURAL
MACADAMIA DIVINE BAR



CONTAINS
18.5g OF SUGAR.
AROUND 96%
OF IT IS ADDED
SUGAR.

FOR EMMA & TOM'S
LIFE BAR CACAO & ORANGE



CONTAINS
15.8g OF SUGAR.
NONE OF IT IS
ADDED SUGAR.

SAVE 17.8 GRAMS OR 4.4 TEASPOONS
OF UNNECESSARY SUGAR IN ONE SWAP.



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SWAP GOLDEN DAY
APRICOT BITES



CONTAINS
21.2g OF SUGAR.
AROUND 62%
OF IT IS
ADDED SUGAR.

FOR DRIED APRICOTS



CONTAINS
16.2g OF SUGAR.
NONE OF
IT IS ADDED
SUGAR.

SAVE 13.1 GRAMS OR 3.3 TEASPOONS
OF UNNECESSARY SUGAR IN ONE SWAP.



*SUGAR BASED ON 40G SERVING SIZE LISTED ON PACK.

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SWAP WOOLWORTH'S SELECT CHOW MEIN



CONTAINS
29.4g OF SUGAR,
AROUND 98%
OF IT IS ADDED
SUGAR.

FOR SUN RICE CHILLI CON CARNE & RICE



CONTAINS
3.3g OF SUGAR,
AROUND 43%
OF IT IS ADDED
SUGAR.

SAVE 27.3 GRAMS OR 6.8 TEASPOONS
OF UNNECESSARY SUGAR IN ONE SWAP.



*SUGAR CONTENT BASED ON SERVING SIZE ON PACK.

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SWAP MCCAIN HEALTHY CHOICE APRICOT CHICKEN



CONTAINS
24.5g OF SUGAR,
AROUND 85%
OF IT IS ADDED
SUGAR.

FOR MICHELLE BRIDGES SALMON FISH CAKES



CONTAINS
7g OF SUGAR,
NONE OF
IT IS ADDED
SUGAR.

SAVE 20.8 GRAMS OR 5.2 TEASPOONS
OF UNNECESSARY SUGAR IN ONE SWAP.



*SUGAR CONTENT BASED ON SERVING SIZE ON PACK.

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LUNCH AND DINNER

Consumers are generally aware that foods such as soft drinks, desserts, biscuits and confectionery contain high levels of sugar, but how much sugar is being added to typically savoury dishes such as lunch and dinner meals?

Lunch in a box swap

Pre-prepared meals with sauces can contain large amounts of hidden sugars, especially Asian-style sauces. Woolworth's Select Chinese Chicken Chow Mein - Meal For One is one such example. A single serve of this contains an enormous 29.4 grams or over 7 teaspoons of sugar, most of which is added. A swap to a similarly convenient SunRice Chilli Con Carne and Rice could remove 6.8 teaspoons of added sugar from a diet.

Frozen meal swap

Frozen meals such as McCain's Healthy Choice range would seem like a healthier option. But McCain's Healthy Choice Apricot Chicken meal contains 24.5g of sugar and around 85% of the sugar is added. Compare this with Michelle Bridges' Salmon Fish Cakes which contains virtually no added sugar. This swap would save a consumer 20.8 grams of sugar or 5.2 teaspoons in just one sitting.

TOTAL AMOUNT OF UNNECESSARY SUGAR SAVED

Simple food swaps every day could make a huge reduction to Australia's consumption of added sugar. If the six outlined product swaps were made every day, consumers could save up to 38.3 kilograms of unnecessary sugar a year. Even if the swaps were made on a less frequent basis, consumers could save almost 15 kilograms of unnecessary sugar a year.³⁷ However these savings can only be achieved with true and meaningful sugar labelling.

“ If the six outlined product swaps were made every day, consumers could save up to 38.3 kilograms of unnecessary sugar a year. ”



YEARLY SAVINGS OF ADDED SUGAR

	SWAP THIS	FOR THIS	ADDED SUGAR SAVED PER DAY	ADDED SUGAR SAVED PER YEAR (swaps made on a less-frequent basis) ³⁸	ADDED SUGAR SAVED PER YEAR (swaps made on a daily basis) ³⁹
Breakfast	Kellogg's Nutri-Grain (40g)	Uncle Tobys Weeties (40g)	10.7 grams or 2.7 teaspoons	2.8 kilograms or 696 teaspoons	3.9 kilograms or 976 teaspoons
Breakfast	Gippsland Yoghurt Raspberry and Coconut Twist (160g)	Gippsland Organics Natural Yoghurt (160g) plus coconut & raspberries	15.3 grams or 3.8 teaspoons	1.6 kilograms or 397 teaspoons	5.6 kilograms or 1,394 teaspoons
Morning snack	Golden Days Apricot Bites (40g)	Dried apricots (40g)	13.1 grams or 3.3 teaspoons	1.4 kilograms or 341 teaspoons	4.8 kilograms or 1,195 teaspoons
Lunch	Woolworths Select Chinese Chicken Chow Mein (350g)	SunRice Chilli Con Carne with rice (200g)	27.3 grams or 6.8 teaspoons	4.3 kilograms or 1,065 teaspoons	10 kilograms or 2,491 teaspoons
After-noon snack	Go Natural Macadamia bar (50g)	Emma & Tom's Life Bar Cacao and Orange (40g)	17.8 grams or 4.4 teaspoons	2.8 kilograms or 693 teaspoons	6.5 kilograms or 1,622 teaspoons
Dinner	McCain Healthy Choice Apricot Chicken (340g)	Michelle Bridges Salmon Fish Cakes (350g)	20.8 grams or 5.2 teaspoons	2.2 kilograms or 542 teaspoons	7.6 kilograms or 1,901 teaspoons
TOTAL SAVINGS			105 grams 26 teaspoons	14.9 kilograms 3,733 teaspoons	38.3 kilograms 9,580 teaspoons

THE SOLUTION - CLEAR AND MEANINGFUL LABELLING

Current labels do not provide sufficient information on sugars to help consumers assess whether there is a little or a lot of sugar added to packaged products. The solution is simple; clear and meaningful added sugar labelling so that consumers can follow the health advice to limit added sugar consumption and maintain a healthy diet.

CHOICE proposes the following so that consumers can make choices in line with the Australian Dietary Guidelines.

1. Label added sugars in the Nutritional Information Panel (NIP)

The NIP currently lists total sugars. A line item underneath total sugars, highlighting added sugars would help consumers identify what proportion of the product contains added sugars. In a 2017 CHOICE survey, 72% of consumers supported listing added sugars in the NIP. Only 5% were against this proposal.⁴⁰

“ 72% of consumers support listing added sugars in the Nutritional Information Panel. ”

Nutrition Information		
Serving Size: 12g	Servings Per Package: 20	NET 240g
	Qty per Serve	Qty per 100g
Energy	187kJ	1560kJ
Protein	0.2g	1.8g
Fat - Total	0.1g	0.6g
- Saturated	0.0g	0.3g
Carbohydrate	10.7g	89.4g
- Total sugars	3.0g	25.1g
- Added sugars	1.5g	12.5g
Sodium	47mg	388mg
Calcium	31.4mg	262mg
Magnesium	9.1mg	76mg
Phosphorus	2.5mg	21mg
Potassium	140.7mg	1173mg

Example of labelling added sugar in the NIP

The NIP is one of the most important communication tools to tell consumers what is in a product. In trials run by the Food Standards Agency (FSANZ), it was found that the NIP is consistently the most commonly used information for choosing one product over another.⁴¹ They also found that the most commonly checked information in the NIP was the amount of sugar, with 60% of Australians looking for this information. With such variation in the amounts of added sugar in similar items and consumer interest in this ingredient, allowing consumers to compare added sugar via the NIP would deliver huge benefits.

2. Group added sugars in the ingredient list

Added sugars are currently listed in the ingredient list. But they can be disguised under different names and distributed throughout the ingredient list. The 2011 Food Labelling Review recommended that where sugars are added as separate ingredients in a food, the term 'added sugar' be used in the ingredient list as the generic term, followed by a bracketed list.⁴² Consumers support this recommendation with 68% in favour of grouping added sugars in the ingredient list.⁴³

This solution would clearly identify which ingredients are added sugar and would group multiple sugar ingredients together, pushing the combined group of sugars towards the front of the ingredient list. This is another important part of the food label with FSANZ trials showing that 72% of consumers saying they use the ingredient list when they purchase a product for the first time.⁴⁴ Again the types of sugars added were the most looked for ingredients in the ingredient list.

INGREDIENTS: ADDED SUGAR (GLUCOSE, BLACKCURRENT PUREE, CONCENTRATED APPLE PUREE, INVERT SUGAR, SUGAR, CASTER SUGAR), ROLLED OATS, HUMECTANT, CHIA SEEDS, WHEAT FIBRE, GELLING AGENT (PECTIN), ACIDITY REGULATOR, PINK LADY APPLE (4.5%), BRAN BUDS, RICE BUBBLES, CASHEWS (6%), PEPITAS (4%), VEGETABLE FIBRE, VEGETABLE OIL, HUMECTANT, PUFFED QUINOA, SALT

Example of grouping added sugars in the ingredient list

3. Label sugars as teaspoons of sugar

Visual representation of complex information helps engage consumers; this can be seen through various labelling initiatives such as Health Star Ratings in Australia and Traffic Light System in the UK. Representing total sugars and added sugars in a food using a visual symbol would greatly help consumers. Labelling of sugar as units of teaspoons is highly supported by consumers. 75% of consumers supported providing images of teaspoons of sugar reflecting the teaspoons of added sugar within the product, according to CHOICE's 2017 survey of consumers.⁴⁵

It is a solution that has been pushed for in the US and UK. In February 2015, the Dietary Guidelines Advisory Committee (DGAC) in the United States released a report that recommended including added sugars in grams and teaspoons in the Nutritional Facts label.⁴⁶ This was on the basis that it would help consumers make informed choices, especially those with low literacy levels. Similarly, Public Health England in their 2017 Childhood Obesity: A Plan for Action, suggested that one way labelling could be improved is through clearer visual labelling, such as teaspoons of sugar, to show consumers about the sugar content in packaged food and drink.⁴⁷

CHOICE believes that further consumer research should be conducted to determine the best way of displaying added sugar via teaspoon labelling.

INITIATIVES INTERNATIONALLY

Australia trails behind other developed countries when it comes to action on sugar. The US introduced a suite of label changes in 2016, resulting in an added sugar declaration in their Nutritional Facts Label (equivalent to Australia's NIP). Canada has also addressed added sugar, by grouping these ingredients in the ingredients list.

The United States

In 2016, the US released a new rule that requires the amount of added sugars in grams and as a percentage of daily value to be included in the Nutritional Facts Label. In making this decision,

the Food and Drug Administration's (FDA) research found that without an added sugar declaration, consumers would not have information they need to construct a dietary pattern that is low in added sugars.⁴⁸ The FDA referred to the scientific evidence underlying the 2010 and 2015-2020 Dietary Guidelines for Americans as well as the recommendation to reduce added sugar from the American Heart Association, The American Academy of Paediatrics, The Institute of Medicine and the WHO. They concluded that consumers could be harmed by not having this critical information needed to maintain healthy dietary practices.

The US's suite of labelling changes, including added sugar labelling, have been estimated to benefit consumers to the tune of almost \$78 billion over a 20-year span according to the FDA's high estimate.⁴⁹

Canada

Canada has addressed sugar labelling through grouping added sugars in the ingredient list and requiring a declaration of a percentage of daily value for total sugars. The justification for the changes were to address consumers' interest to better understand the sugar content of foods, help consumers apply Canada's Food Guide recommendations, help consumers reduce their intake of excess calories and align with the US proposal.⁵⁰

The initial review of nutrition information on food labels in Canada had also recommended a declaration of added sugar in their NIP. CHOICE believes consumers and public health needs were severely compromised by the dropping of this recommendation. The grouping of added sugars will provide consumers with a clearer indication of the sugars added to the product but not the amount.

UK

The UK is introducing a Soft Drinks Industry Levy which is set to begin on April 2018 in order to address the country's obesity problem.⁵¹ There is also a private Member's Bill proposing that sugar content of a product be represented on food labels in 'teaspoon units'.⁵²

SUMMARY

Consumers need clear and accurate information to make informed choices about their food. Right now, Australian food labelling requirements do not let consumers follow the advice set by leading national and international health institutions. This means that Australians, especially children and teenagers, are unknowingly over-consuming added sugar.

Small amounts of added sugar in everyday foods add up and contribute to Australia's sugar problem. CHOICE's added sugar calculations highlight that if six simple food swaps were made every day, consumers could save up to 38.3 kilograms of unnecessary sugar a year.

Consumers need to be able to make informed choices about the amount of sugar added to a food. Current labels allow food manufacturers to hide added sugars, requiring complex calculations to identify the true composition of a food.

The solution is clear and is strongly supported by consumers: **label added sugar**. CHOICE is calling on Food and Health Ministers to take action on added sugar and label it clearly on food products.



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2. The WHO recommendation relates to free sugars, which includes added sugars plus honey and fruit juice. CHOICE supports this definition but for the purposes of this paper, we term the WHO's definition of free sugar as added sugar.
3. Louie et al, 2014, A systematic methodology to estimate added sugar content of foods, European Journal of Clinical Nutrition, Vol 69
4. Bernstein et al, 2016, Total and Free Sugar Content of Canadian Prepackaged Foods and Beverages, Nutrients, Vol 8, Issue 9
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6. World Health Organisation, 2015, Guideline: Sugars intake for adults and children
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12. Based on a 375mL can of coke
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23. World Health Organisation, 2015, Guideline: Sugars intake for adults and children
24. CHOICE, 2017, Consumer Pulse Survey in response to 'Thinking about food labels, in what order are the ingredients listed?' Single response a) Alphabetically b) By weight c) The manufacturer decides how to list the ingredients d) Randomly e) I don't know
25. FSANZ, 2010, NUTTAB Online Searchable Database
26. Without knowing a product's ingredient breakdown, the calculations of added sugar are considerably challenging. CHOICE has made a best attempt at calculating added sugar based on the available information. However there may be slight variations. CHOICE has calculated one teaspoon of sugar to equal 4 grams of sugar. All calculations are footnoted throughout the report.
27. Retail World, 2014
28. Nutri-Grain does not contain any fruit, vegetables or lactose which are the main contributors to intrinsic sugars. We have stated that almost all of the sugar is added as there may be a very small amount of intrinsic sugars in the grains.
29. 160g of Gippsland plain yoghurt with no added sugars contains 11.4g of sugars. 160g of a similar product underneath the same brand such as Gippsland Raspberry and Coconut Yoghurt would contain a similar amount of intrinsic sugar. It also contains intrinsic sugars from the raspberries which total 0.66g of sugar (product contains 9.4g of raspberries and 100g raspberries contain 7g sugar). Total sugar for this product equals 27.3g. Total sugar (27.3g) minus intrinsic sugars (12g) equals added sugars (15.3g). Added sugars make up 56% of total sugars.
30. Based on adding 20 grams of raspberries and 8g of coconut flakes to the plain yoghurt.
31. Macadamia Divine Bar contains 16g macadamias which total 0.7g sugar (100g macadamia nuts contain 4.5g sugar). Total sugar (18.5g) minus intrinsic sugar (0.7) equals added sugar (17.8g). Added sugars make up 96% of total sugars.
32. A 40g serve of Apricot Bites contain 20g apricots which have 8.1g sugar (100g dried apricots contains 40g sugar). Total sugar (21.2g) minus intrinsic sugars (8.1g) equals added sugars (13.1g). Added sugars make up 62% of total sugars.
33. A 350g Chinese Chicken Chow Mein contains small amounts of chives, ginger and garlic. Intrinsic sugars equal 0.67g (100g chives equals 2.6g sugar, 100g garlic equals 1.5g sugar and 100g ginger equals 1.7g sugar). Total sugar (29.4g) minus intrinsic sugars (0.67g) equals added sugar = 28.7g. Added sugars make up 98% of total sugars.
34. Chilli Con Carne contains 66g vegetables. There is no breakdown of how much there is of each vegetable so we have taken the average sugar content of the vegetables listed (tomatoes, onions, capsicum, jalapenos, garlic and kidney beans). The average sugar content of these vegetables is 1.87g (2.84g sugar per 100g). Total sugar (3.3g) minus intrinsic sugar (1.87g) equals added sugar (1.4g). Added sugars make up 43% of total sugars.
35. Apricot Chicken contains apricot puree (15%) and apricots (5%). The puree also contains water, sugar, thickeners, acidity regulators, natural flavour and

preservatives. It is not clear how much apricot is within the puree so we have made an assumption that 15% (52.5g) of the total product is apricots. This equals 3.5g sugar (100g apricots equals 6.6g sugar). The product also contains cooked rice but doesn't state how much. We have estimated a cup of rice (170g) which totals 0.17g sugar (100g cooked rice equals 0.1g sugar). Total sugar (24.5g) minus added sugar (3.7g) equals added sugar (20.8g). Added sugars make up 85% of total sugars.

36. We say virtually no added sugar because Michelle Bridge's Salmon Fish Cakes contains lemon juice concentrate. There is no indication of how much is in the product however we have made the assumption it contributes very little added sugar due the small amount of sugar in this ingredient and the fact that it appears towards the end of the ingredient list.
37. Based on swapping Nutri-Grain to Weeties 5 times a week, flavoured yoghurt to plain yoghurt 2 times a week, macadamia nut bar to fruit bar 3 times a week, Apricot Bites to dried apricots 2 times a week, Chinese Chow Mein to Chilli Con Carne 3 times a week and Healthy Choice Apricot Chicken to Salmon Fish Cakes 2 times a week, over the course of a year.
38. Ibid
39. Based on swapping all six products on a daily basis over the course of the year.
40. CHOICE, 2017, Consumer Pulse Survey in response to 'Which approach below do you support regarding added sugar in foods and beverages?' - 'Listing 'Added sugars' in the Nutritional Information Panel on food labels (currently only total sugars are listed).
41. FSANZ, 2015, Consumer Label Survey
42. Blewett et al, 2011, Labelling Logic – Review of Food Labelling Law and Policy
43. CHOICE, 2017, Consumer Pulse Survey in response to 'Which approach below do you support regarding added sugar in foods and beverages?' - 'Grouping 'Added sugars' together in the ingredient list (currently there are 43 names for sugar within the ingredient list)
44. FSANZ, 2015, Consumer Label Survey
45. CHOICE, 2017, Consumer Pulse Survey in response to 'Which approach below do you support regarding added sugar in foods and beverages?' - 'Providing images on packs of teaspoons of sugar reflecting the teaspoons of added sugar within the product'
46. Department of Health and Human Services and Department of Agriculture, 2015, Scientific Report of the 2015 Dietary Guidelines Advisory Committee
47. Gov.UK, 2017, Guidance – Childhood Obesity: a plan for action
48. Department of Health and Human Services, 2016, Federal Register / Vol. 81, No. 103 / Rules and Regulations
49. Centre for Science in the Public Interest, 2017, Food Industry Urges Delay of Nutritional Facts Label
50. FSANZ, 2016, Current and proposed international labelling requirements for sugar, fats and oils - Labelling Review Recommendation 1.2
51. Gov.UK, 2016, Policy Paper Soft Drinks Industry Levy
52. FSANZ, 2016, Current and proposed international labelling requirements for sugar, fats and oils - Labelling Review Recommendation 12