Public Health Association AUSTRALIA

Sugar Labelling

Policy Position Statement

Key messages: Excess consumption of added sugars is a major public health concern in Australia. Most added sugar in Australian diets comes from processed, packaged products. However, current labelling regulations leave consumers without an easy way to identify added sugars and restrict other public health initiatives. Improvements to sugars labelling are needed in Australia to make added sugars clearly identifiable. A comprehensive definition of added sugars will best support consumer choice and public health policies.

Key policy positions:

1. A comprehensive regulatory definition of added sugar that includes all sources of sugars that are added to a product (i.e. that were not present previously), whether through an ingredient or process and regardless of the terminology used, must be adopted to improve transparency and better support public health initiatives, including consumers' ability to choose products lower in added sugars.
2. Regulations regarding the display of information on processed and packaged foods should be revised to require the quantification of the amount of added sugars in the Nutrition Information Panel; and the clear and explicit identification and grouping of sugars-based ingredients and other ingredients that add sugar in the statement of ingredients.
3. Additional interpretive measures to support informed consumer choices, including warning labels and/or pictorial displays of sugar/added sugar content, and particularly for beverages.
4. A comprehensive consumer education campaign should be conducted with the aim of increasing awareness amongst consumers of the importance of limiting added sugar intake and improving ability to read and interpret food labels.
5. The Health Star Rating system algorithm should be updated to include added sugars, with further adjustments to improve differentiation between products with more and less/no added sugar.
6. Alcoholic beverages should not be permitted to display sugar claims.

Audience: Federal, State and Territory Governments, policymakers and program managers, PHAA members, media.

Responsibility: PHAA's Food and Nutrition Special Interest Group

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Sugar Labelling

Policy position statement

Note: This position statement should be read in conjunction with the Sugar Labelling background paper.

PHAA affirms the following principles:

1. The excess consumption of added sugars contributes to health conditions that place a significant burden on individuals and society, both directly and indirectly.
2. Food labelling is intended to support consumers to make informed, healthier choices.

PHAA notes the following evidence:

3. Foods and beverages can contain added and/or naturally occurring sugars. What constitutes an 'added' sugar is contested and definitions and terminologies vary, with both 'added' and 'free' sugars commonly used.[1,2]
4. Products high in added and free sugars can displace more nutritious foods in the diet. Excess intake of these sugars is associated with poor dietary quality and contributes to dental caries, unhealthy weight and non-communicable diseases such as type 2 diabetes, cardiovascular disease, non-alcoholic fatty liver disease, kidney disease and certain cancers.[3–5]
5. To reduce the risk of adverse health outcomes, the Australian Dietary Guidelines (ADGs) and the World Health Organization (WHO) recommend limiting consumption of added sugars;[6] the WHO strongly recommends restricting free sugars in diets to <10% of total energy intake.[7]
6. Over half of Australians, including a majority of children as young as 2-3 years, exceed the WHO-recommended maximum intakes for added (free) sugars.[8] Children and adolescents aged 4-18 years are most likely to consume added sugars in excess of these recommendations, with over two-thirds consuming too much added sugar.[8]
7. Current Australian regulations regarding sugar labelling are deficient, while a number of countries now mandate improved added sugars labelling.[1,2] It is virtually impossible for consumers to know how much added sugar is in a product as this is not required to be displayed. In addition, it is difficult to identify the presence of added sugars as there are a multitude of names and terms used, many of which are not clear or specific. [9]
8. Research into consumer understanding of sugar labelling suggests:
    - Consumers are confused about how much sugar they consume.
    - Consumers may not be able to determine whether a given product is high or low in sugar.
    - Consumers can be confused about what added sugars are and what types of sugars should be limited in the diet.[10]
9. Beyond food labels, there is limited information available to consumers about the added sugar content of foods.[11]
10. Public health initiatives may help to motivate consumers to limit consumption of foods containing added sugars, but the lack of information about the added sugar content of foods limits their ability to follow this advice.[12] Existing initiatives such as the Health Star Rating system and Healthy Food Partnership insufficiently address concerns with added sugar content and intake, hampered by the lack of information about the added sugars content of foods.[11] The development and implementation of

these and other policies (e.g. compositional limits, levies on content) will be strengthened through an adequate consideration of added sugar, supported by improved labelling. Reliable methods to estimate added sugars content are also available for use in quantifying added sugars content for the purposes of nutrition labelling and other public health policies.[1]

11. Implementing this policy would contribute towards the achievement of UN Sustainable Development Goal 3 – Good Health and Wellbeing, and Goal 2 – Zero Hunger.

PHAA seeks the following actions:

12. A comprehensive definition of added sugars that includes all sources of sugars added to a product through both ingredients and processes must be introduced into regulation.[10] This is a minimum requirement for effective public health policy to address the consumption of added sugars in Australia, and weaker definitions that exclude certain types of added sugars will lead to suboptimal results.[10] A daily intake reference value for added sugars, based on WHO or other stringent recommendations, and cut-offs for high/medium/low messaging should also be established.[6] Definitions and terms must be future proofed to ensure that further developments by the food and beverage industry do not create, or take advantage of any gaps, or loopholes.

13. Nutrition labelling requirements for foods available in Australia must be amended to include the mandatory quantification of added sugar in the Nutrient Information Panel (see below for an example).[13] This could be enhanced with additional contextual and interpretive information, such as high/medium/low labels.

14. Changes should also be made to requirements for the statement of ingredients, so that ingredients which add sugar to products are explicitly reported and clearly identifiable, for example through aggregating all added sugar ingredients (see below for an example).[9]

15. Additional options including warning labels or pictorial displays can enhance consumer ability to correctly interpret nutrition information and identify high and low sugar/added sugar items and are able to operate in alignment with existing schemes. [14,15]

16. Labelling updates should be accompanied by an appropriately designed, funded and implemented consumer-education campaign to increase consumer use and understanding of sugar and added sugar labelling.

17. Information about the added sugar content of foods should be used in existing initiatives to address excess sugar consumption, including incorporation into the Health Star Rating system algorithm, and reformulation targets set by the Healthy Food Partnership.[11]

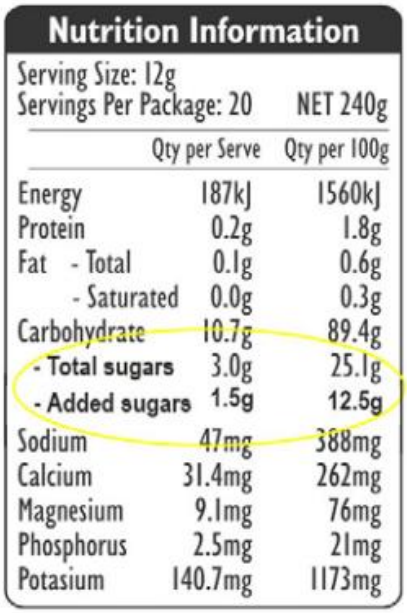
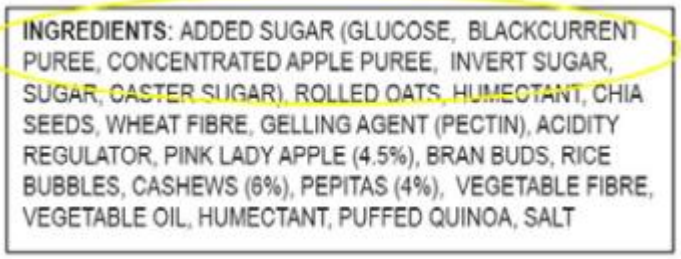
18. Alcoholic beverages should explicitly not be permitted to display sugar claims.

PHAA resolves to:

19. Advocate for the above steps to be taken based on the principles in this position statement.

(Adopted 2018, revised 2021, and 2024)

Examples of labelling improvements mentioned in this document

Quantifying added sugar in the nutrition information panel. *Source: Choice. End the Sugar-Coating. A Choice report into added sugar labelling in Australia 2017*	
A bracketed list where added sugars are grouped and listed after the term 'added sugar'. *Source: Choice. End the Sugar-Coating. A Choice report into added sugar labelling in Australia 2017*	

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