

# Sugar Labelling

## Policy Position Statement

**Key messages:** Excess consumption of added sugars has been identified as a concern in Australia. Sugars are carbohydrates that occur naturally in foods such as milk and whole fruit, and can also be added to food and drinks by manufacturers or consumers. There is consistent public health guidance to limit intake of added sugars. Existing Australian Dietary Guidelines currently recommend avoiding added sugars, whereas more recent World Health Organization guidance relates to limiting 'free' sugars, which includes all added sugars *plus* all non-intact (e.g. juiced or pureed) fruit and vegetables. Foods and drinks high in added and free sugars can displace more nutritious foods and drinks in the diet.

Currently, manufacturers are only required to provide 'total sugars' information in the mandatory nutrition information panel, meaning that consumers have no easy way to identify the added or free sugars they should be avoiding. Improvements to sugars labelling are needed in Australia to allow consumers to make informed choices in line with dietary guidance.

- Key policy positions:**
1. The Public Health Association of Australia supports the development and adoption of expansive policy definitions and objectives that address all sources of sugars that are harmful to health, regardless of the terminology used e.g. added and/or free sugars.
  2. Nutrition information on all packaged foods should be reformed to:
    - Quantify the amount of harmful sugars (i.e. added and free sugars components) in the mandatory Nutrition Information Panel and
    - Update requirements for the statement of ingredients to overtly identify sugars-based ingredients (i.e. through grouping or other means)
  3. Additional interpretive measures should be considered including advisory labels and/or pictorial displays of the amount of sugars, particularly for beverages.
  4. A comprehensive consumer education campaign should be conducted with the aim of teaching consumers how to read and interpret the food label changes.
  5. The Health Star Rating system algorithm should be updated to include added/free sugars.
  6. Further research is needed to develop the evidence base to inform policy in this area, particularly its implementation and effectiveness and impact on consumer behaviour and improving the food supply.

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

**Responsibility:** PHAA's Food and Nutrition Special Interest Group

**Date adopted:** 23 September 2021

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## Policy position statement

*Note:* This position statement should be read in conjunction with the [Sugar Labelling background paper](#), which provides evidence and justifications for the public health policy positions in this position statement.

### PHAA affirms the following principles:

1. While overweight and obesity are not solely caused by excess consumption of added sugars, these conditions place a significant burden on society, in both direct and indirect costs.
2. Food labelling is intended to enable consumers to make informed choices and support public health objectives.

### PHAA notes the following evidence:

3. Foods and beverages (hereafter Foods) can contain a combination of added and naturally occurring sugars.
4. Foods high in added sugars and naturally occurring sugars may displace more nutritious foods in the diet and can contribute to dental caries, unhealthy weight gain and associated non-communicable diseases (NCDs).
5. To prevent these adverse health outcomes, the Australian Dietary Guidelines (ADGs) and the World Health Organization (WHO) recommend limiting consumption of foods containing added sugars.
6. Health and nutrition surveys in Australia report that over half of the surveyed population are exceeding recommended maximum intakes for added sugars.
7. However, food labels currently make it virtually impossible for consumers to identify the amount of added sugar in a product. In addition, food manufacturers use a multitude of names for added sugars that may be distributed throughout the ingredients list, making it difficult and time-consuming to interpret.
8. Consumer research in relation to understanding of sugar and food labelling suggests:
  - Consumers are confused about how much sugar they are consuming
  - 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 for good health
9. Beyond food labels, there is limited information available to consumers about the added sugar content of foods.
10. Existing initiatives to address poor diet 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

consumers' ability to follow this advice. Implementation of existing initiatives such as the Health Star Rating System and Healthy Food Partnership may also be hampered by lack of information about the added sugar content of foods.

11. Implementing this policy would contribute towards achievement of UN Sustainable Development Goals 3: Good Health and Wellbeing.

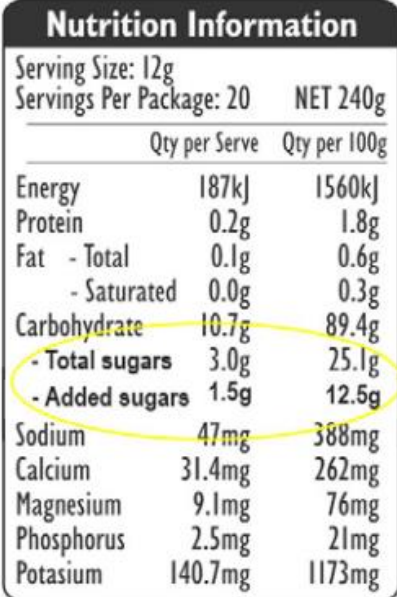
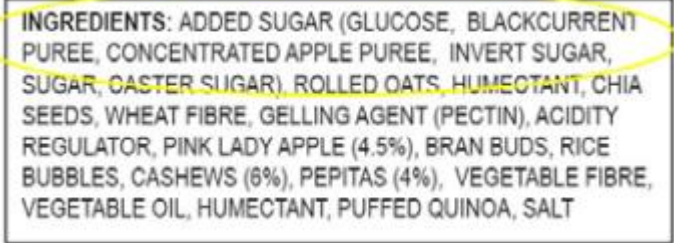
### **PHAA seeks the following actions:**

12. At a minimum, labelling of sugar on Australian foods should be amended to quantify added sugar in the mandatory Nutrient Information Panel as a component of existing total sugar information. This inclusion could be enhanced with additional contextual information, such as high/medium/low messaging for added sugar to allow consumers to make judgments without requiring product comparisons.
13. Changes should also be made to the statement of ingredients to overtly identify sugars-based ingredients, for example through a bracketed list or use of asterisks or bolding.
14. Additional options including advisory labels or pictorial displays of the amount of sugar in food should also be considered if these enhance consumer interpretation of the food label and are able to operate in alignment with existing schemes. For example, such labels may be appropriate on beverages if shown that the Health Star Rating graphic is not able to adequately inform consumers in this category.
15. Details such as which sugars are considered to be 'added sugars', or how 'high in' added sugar would be defined are matters to be considered during implementation:
  - For the purposes of implementing the above options, PHAA supports adoption of an expansive definition that includes all sugars that are harmful to health, regardless of the terminology used. This definition should include those sugars referred to in WHO Guidelines as 'free sugars' which include not only monosaccharides and disaccharides, but also sugars naturally present in honey, syrups, 100% fruit juices and fruit juice concentrates. In the US context, where any of these sugars are added during the processing of foods, or are packaged as such (e.g. a bag of sugar), they must be quantified in the NIP as added sugars. For a more comprehensive list of food components to be included and excluded, please see PHAA's background paper.
  - PHAA supports establishment of a daily intake reference value for added sugars, or cut-offs for high/medium/low messaging, while noting that determination of these reference points should not unduly delay uptake of quantified added sugar information in the NIP and improvements to the ingredients list.
16. Labelling updates should be accompanied by an adequately funded consumer-education campaign to increase consumer use and understanding of the updated label.
17. Information about the added sugar content of foods available on improved labels should be used in existing initiatives to address poor diet, including incorporation into the Health Star Rating system algorithm, and reformulation targets set by the Healthy Food Partnership.

**PHAA resolves to:**

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

**Examples of labelling options mentioned in this policy positions statement**

<p>Quantifying added sugar in the nutrition information panel.  <i>Source: Choice. End the Sugar-Coating. A Choice report into added sugar labelling in Australia 2017 <a href="#">End the Sugar-Coating - CHOICE Campaigns - Community</a></i></p>	 <table border="1"> <thead> <tr> <th colspan="3">Nutrition Information</th> </tr> <tr> <td>Serving Size:</td> <td>12g</td> <td>NET 240g</td> </tr> <tr> <td>Servings Per Package:</td> <td>20</td> <td></td> </tr> <tr> <td></td> <th>Qty per Serve</th> <th>Qty per 100g</th> </tr> </thead> <tbody> <tr> <td>Energy</td> <td>187kJ</td> <td>1560kJ</td> </tr> <tr> <td>Protein</td> <td>0.2g</td> <td>1.8g</td> </tr> <tr> <td>Fat - Total</td> <td>0.1g</td> <td>0.6g</td> </tr> <tr> <td>- Saturated</td> <td>0.0g</td> <td>0.3g</td> </tr> <tr> <td>Carbohydrate</td> <td>10.7g</td> <td>89.4g</td> </tr> <tr> <td>- Total sugars</td> <td>3.0g</td> <td>25.1g</td> </tr> <tr> <td>- Added sugars</td> <td>1.5g</td> <td>12.5g</td> </tr> <tr> <td>Sodium</td> <td>47mg</td> <td>388mg</td> </tr> <tr> <td>Calcium</td> <td>31.4mg</td> <td>262mg</td> </tr> <tr> <td>Magnesium</td> <td>9.1mg</td> <td>76mg</td> </tr> <tr> <td>Phosphorus</td> <td>2.5mg</td> <td>21mg</td> </tr> <tr> <td>Potassium</td> <td>140.7mg</td> <td>1173mg</td> </tr> </tbody> </table>	Nutrition Information			Serving Size:	12g	NET 240g	Servings Per Package:	20			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
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(ADOPTED 2018, revised 2021)

**References**

(Please see the associated Background Paper for references.)