

# FSANZ P1058 – Nutrition labelling about added sugars

**Response to consultation  
October 2023**

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## About Dietitians Australia

Dietitians Australia is the national association of the dietetic profession with over 8500 members, and branches in each state and territory. Dietitians Australia is the leading voice in nutrition and dietetics and advocates for food and nutrition for healthier people and healthier communities.

The Accredited Practising Dietitian (APD) program provides an assurance of safety and quality and is the foundation of self-regulation of the dietetic profession in Australia.

This submission was prepared by members of the Dietitians Australia Food Regulatory and Policy Committee following the [Conflict of Interest Management Policy](#) and process approved by the Board of Dietitians Australia. Contributors include Dietitians Australia members with wide ranging expertise in areas including public health, food systems, food industry and academia.

Dietitians Australia welcomes the opportunity to provide input into this consultation.

Dietitians Australia recognise the robust work completed to date by the team at FSANZ and congratulates the team on the processes undertaken as part of this consultation.

Dietitians Australia supports the overall direction and submits feedback aimed to strengthen the public consultation and final Code.

## Recommendations

Question 1: Do you support the above food categories to not be captured as sources of added sugars? Why/why not?

**Dietitians Australia strongly support the proposed approach.**

Question 2: Do you think any of these food categories need to be specifically listed in the Code? why/why not?

**Dietitians Australia strongly support these food categories being listed in the Code.**

Question 3: Do you agree with the addition of maltose? Why/why not?

**Dietitians Australia strongly support the inclusion of maltose** since it is another disaccharide of two glucose molecules with an  $\alpha(1\rightarrow4)$  bond. In human digestion, maltase enzymes break this bond to product two glucose molecules. Therefore, it is consistent with the policy of identifying added sugars to include maltose. For the same reasons, its isomer, isomaltose, should also be included.

Question 4: Should any other mono- or disaccharides be explicitly listed?

**Dietitians Australia strongly support the inclusion of the other mono- and disaccharides listed.**

- Glucose should be specifically included.
- Lactose in whey powder should be specifically included.
- Galactose should be specifically included: as per other mono- and disaccharides once this is isolated from its original food source and added as an ingredient it should be considered an added sugar. Consistent with PHE definition
- D-Tagatose and D-Allulose should be included – there should not be an exclusion for low-energy sugars

Question 5: Does the new name adequately capture fruit sugar syrups and other plant-based syrups as intended?

**Dietitians Australia strongly support a more inclusive name.** Such as “sugar syrups derived from plants”. There is a risk that “sugar syrups made from plants” might be interpreted narrowly by industry to only include sugar containing syrups sourced with minimal processing. A narrow

interpretation could exclude enzymatically processed products such as corn syrup and rice malt syrup.

Question 6: Are there any unintended consequences associated with this name change?

**Dietitians Australia strongly support the term “sugar syrups derived from plants”.**

Question 7: Is ‘and similar products’ necessary, or are such similar products already adequately captured by the different ingredients listed in this table?

**Dietitians Australia strongly support the term “and similar products”.**

Question 8: Would this capture icing sugar or does this need to continue to be specified individually below?

**Dietitians Australia strongly support the specification of icing sugar, as it may be mixed with cornflour and therefore would not be captured by the phrase “derived at a sugar refinery”.**

Question 9: Do you agree to treat fruit and vegetable juice concentrates the same as both contribute to the ‘added sugar’ content? Why/why not?

**Dietitians Australia strongly support the treatment of fruit and vegetable concentrates as the same, we advocate that fruits and vegetables should be treated the same throughout the added sugar definition, which is in line with the approaches from the United Kingdom and United States.**

Question 10: Are there any issues with other source names identified in Table 1 that we are not proposing to modify?

**Dietitians Australia recommends the inclusion of coconut sugar.**

Question 11: Do you support the proposed approach to include the following as sources of ‘added sugars’? Why/why not?

a) Single strength fruit and vegetable juice.

**Dietitians Australia strongly support the proposed approach.**

b) Powdered fruit and vegetable juices.

**Dietitians Australia strongly support the proposed approach.**

Question 12: Do you support the proposed approach to exclude the following as sources of ‘added sugars’? Why/why not?

a) Fruit and vegetable component of canned and frozen fruit and vegetables.

**Dietitians Australia strongly support the proposed approach.**

b) Dried fruit and dried vegetables.

**Dietitians Australia support the proposed approach, with the caveat that this only pertains to whole dried fruit and vegetables, where the cell wall is not broken, or where whole intact dried fruit and vegetables are cut into pieces. Dried fruits and vegetables that have been processed to the extent that they are pastes or dehydrated juice pieces should be considered added sugar within the definition of added sugar.**

c) Processed fruit and vegetables including pulps, pastes, purees, extruded and powdered (except for powdered juices).

**Dietitians Australia strongly opposes the proposed approach, as this would be highly misleading for consumers. These products include concentrated forms of sugars harmful to health.**

Question 13: What foods currently display no added sugars or unsweetened claims that would be impacted by this proposed approach? Please list the type of food and affected ingredient (juice or powder) and provide the number of stock keeping units (SKUs) affected.

**Dietitians Australia strongly advocates for public health impact to be considered before stock keeping units.** An appropriate transition period for the policy of two years, should not burden the industry.

Question 14: Do you support the proposed approach where mono- and disaccharides with an energy level less than 17 kJ/g in section S11—2(3) are not ‘added sugars’? Why/why not?

**Dietitians Australia note and agree with government comments in the FSANZ summary of outcomes from targeted stakeholder consultations document (page 5) “the proposed exclusion from declaring low energy sugars in the total sugars declaration would be less accurate than current labelling”.**

Question 15: Do you support the proposed approach for the added sugars labelling of ‘added sugars’ sold as single ingredient foods? Why/why not?

**Dietitians Australia strongly supports the proposed approach.**

Question 16: Should sugars formed from hydrolysis during food manufacture be considered ‘added sugars’? Why/why not?

**Dietitians Australia supports the inclusion of sugars formed from hydrolysis.**

Question 17: What approach would generally be taken to quantify ‘added sugars’ in this situation?

**Dietitians Australia has no comment to be provided on this question.**

Question 18: What foods, (in which sugars are formed from hydrolysis during manufacture) currently display no added sugars or unsweetened claims? Please list the type of food and provide the number of stock keeping units (SKUs) affected.

**Dietitians Australia strongly advocates for public health impact to be considered before stock keeping units.** An appropriate transition period for the policy of two years, should not burden the industry.

Question 19: Do you support the proposed approach? Why/why not?

**Dietitians Australia strongly supports the proposed approach.**

Question 20: Do you agree with the proposed approach? Why/why not? In particular, please explain why current practice for (total) sugars declarations in relation to sugars from carriers can or cannot be applied to ‘added sugars’ in the NIP.

**Dietitians Australia strongly supports the proposed approach.**

Question 21: Do you think a threshold for added sugars present as a carrier in an ingredient is required? If yes, please explain why, in what situation it would be useful and suggest what the threshold could be, giving reasons.

**Dietitians Australia strongly supports the threshold for added sugars present as a carrier in an ingredient is required.**

Question 22: If a threshold was applied that could result in an added sugars value of zero, would the added sugars potentially be included in the total sugars quantification or not? Please explain.

**Dietitians Australia notes that the total sugars amount should be a reflection of all sugars in the product consumed.**

Question 23: Are you aware of any other situations and/or food types where quantification of added sugars could be complex and therefore need specific consideration? Please explain.

**Dietitians Australia has no comment to be provided on this question.**

Question 24: Do you support the proposed approach for the presentation of added sugars in the NIP, as shown above? Why/why not?

**Dietitians Australia strongly supports the proposed approach.**

Question 25: Do you think a reference value for added sugars is required to enable %DI information to be provided in the NIP, consistent with other nutrients in the NIP? Why/why not?

**No.**

Question 26: Do you think a reference value for added sugars of 50 g should be included in the Code? Why/why not?

**No.**

Dietitians Australia looks forward to participating in the public consultation, and providing rationale as needed to support and/or oppose the proposed approaches. We are conscious of industry influence and call on FSANZ to publish all submissions in full on the FSANZ website in a timely manner.

Dietitians Australia again recognises the robust approach of the FSANZ team to deliver a consultative process which is open to debate and resulting in a Code which is beneficial for all Australians.