



Consumers Health  
Forum OF Australia

RESPONSE

**Nutrition labelling  
about added sugars:  
Food Standards Australia  
New Zealand**

October 2022

Consumers Health Forum of Australia (2022)  
Nutrition labelling about added sugars:  
response to FSANZ discussion paper and  
consultations

**P:** 02 6273 5444

**E:** [info@chf.org.au](mailto:info@chf.org.au)

[twitter.com/CHFofAustralia](https://twitter.com/CHFofAustralia)

[facebook.com/CHFofAustralia](https://facebook.com/CHFofAustralia)

**Office Address**

7B/17 Napier Close,  
Deakin ACT 2600

**Postal Address**

PO Box 73  
Deakin West ACT 2600

*Consumers Health Forum of Australia is  
funded by the Australian Government as the  
peak healthcare consumer organisation under  
the Health Peak and Advisory Bodies Program*

## Introduction

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CHF thanks Food Standards Australia New Zealand for the opportunity to consult and respond to the discussion paper on nutritional labels for added sugar. CHF is the peak body representing the consumer voice in Australian healthcare.

The key principle in sugar labelling for consumers is to include information that is clear, meaningful, and easy to read, access and understand. Overall, CHF supports the approach taken by FSANZ in the discussion paper.

CHF has responded to relevant questions posed in the discussion paper. Overall, the definition and labelling of added sugar should not be limited by consumer literacy. Rather, the definitions should be evidence based and consumers given the material that they need to make informed decisions. CHF asks that labels and educational resources are tested directly with consumers before being adopted and implemented.

## Answers to questions

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### Question 1: Support exclusion of defined categories

CHF supports the proposed approach, as the items specified are not added sugars. However, CHF suggests providing a definition of “naturally present”, in line with TGI/VicHealth Paper (Jones A, T. Scapin. Supporting evidence-informed work on added sugars - a report prepared for VicHealth. The George Institute for Global Health, Sydney; 2021.)

### Questions 3 to 9

Source/amendment	Questions	CHF response
Monosaccharides and disaccharides including dextrose, fructose, sucrose, maltose and lactose  Currently included as 'sugars*' in the Code, with the new addition of maltose for further clarity.	3. Do you agree with the addition of maltose? Why/why not?	Maltose should be listed as an added sugar, as it is a glucose product produced through a fermentation process and used as a sweetener.
	4. Should any other mono- or disaccharides be explicitly listed?	Suggest listing glucose, lactose, galatose, and low energy sugars such as D-Tagatose and D-Allulose. Might also consider sugar alcohols that may be low energy but have other effects.

Source/amendment	Questions	CHF response
Sugar plant syrups made from plants. New naming intended to capture 'fruit sugar syrups' currently listed as 'sugars*' in the Code, as well as other plant-based syrups such as agave, palm, rice and coconut.	5. Does the new name adequately capture fruit sugar syrups and other plant-based syrups as intended?	Yes.
	6. Are there any unintended consequences associated with this name change?	
Glucose syrups, maltodextrin and similar products	7. Is 'and similar products' necessary, or are such similar products already adequately captured by the different ingredients listed in this table?	Yes. It is important to include "and similar products".
Products derived at a sugar refinery, including brown sugar and molasses <ul style="list-style-type: none"> <li>• Icing sugar</li> <li>• Honey</li> <li>• Malt/malt extracts</li> </ul>	8. Would this capture icing sugar or does this need to continue to be specified individually below?	Icing sugar/icing sugar mixes should be included to capture additions, including cornflour, that mean it is not derived at a sugar refinery.
Concentrated fruit/vegetable juice	9. Do you agree to treat fruit and vegetable juice concentrates the same as both contribute to the 'added sugar' content? Why/why not?	Fruit and vegetable concentrates should be treated as added sugar. Not treating them equally could create an incentive for manufacturers to substitute fruit juice concentrates with vegetable juice concentrates, enabling claims of lower sugar, when that is not the case.

### Question 10: Other issues with source names in table

There should not be a distinction between deionised vegetable juice and deionised fruit juice. Both should be classified as added sugar, even though only deionised vegetable juice is currently used.

Coconut sugar should be specified, as is not refined, so may not otherwise be captured.

### **Question 11: Including single strength and powdered fruit/vegetable juice as added sugar**

CHF agrees with this approach, which will help consumers who want to follow dietary guidelines and other health recommendations to limit juice intakes.

### **Question 12: Sources of added sugar to be excluded**

Fruit and vegetable components of canned and frozen fruit and vegetables as added sugars should be excluded. However, the case for excluding dried and processed fruit and vegetables is less clear. The labelling on these products should enable consumers to understand that there are concentrations of sugar in these products than in their natural forms, and to make informed choices that are consistent with dietary guidelines.

### **Question 15: Added sugars sold as single ingredient foods**

CHF agrees with the approach taken by FSANZ on added sugars as single ingredient foods. This approach is consistent with the format of nutritional panels and helps consumers to make informed choices.

The educational and awareness raising approach suggested by FSANZ will support consumer understanding when using high sugar content single ingredient foods, such as honey and maple syrup.

### **Question 19: Including added sugar in fermented food and alcohol**

Sugar created through fermentation – or any other production process – should be included on labels. This will inform consumers of the sugar content in the end product, so that they can make their own nutritional choices.

### **Questions 20 to 22: Continue current approach to labelling incidental added sugars, and thresholds**

The current practice, which is familiar to consumers and consistent with treatment of other nutrients, should continue. Applying a threshold for the combined total of sugar carriers in a product is consistent with treatment of other nutrients and will help to restrict additives to necessary amounts, rather than to unnecessarily sweeten foods. The total sugar amount listed on labels should include all added sugar.

### **Questions 24 to 26: Presentation of added sugar information on labelling**

CHF is concerned that the proposal to include a 50 gram reference value in the Code would not add value, and may create confusion, because it suggests that is the energy recommendation across the population, including for children.

Ultimately, the presentation of all labelling information, together with any educational resources targeted to consumers, should be directly tested with consumers.