

EU reply

CL 2023/94/OCS-SCH

REQUEST FOR COMMENTS/INFORMATION ON THE ESTABLISHMENT OF A
DEFINITION OF ADDED SUGARSEuropean Union Competence
European Union Vote

Q1: Does your country have a definition of added sugars? If YES, please provide the definition and its reference (links, documents and other information you consider necessary).

<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> UNDER DEVELOPMENT
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In the European Union (EU), [Regulation \(EU\) No 1169/2011¹](#) on the provision of food information to consumers provides for the mandatory nutrition declaration of (total) sugars² on prepacked food and does not provide a definition of added sugars for nutrition labelling purposes. However, some definitions have been used for different purposes.

In the EU, [Regulation \(EC\) No 1924/2006 on nutrition and health claims made on foods³](#) refers to the nutrition claim “with no added sugars”:

“WITH NO ADDED SUGARS: A claim stating that sugars have not been added to a food, and any claim likely to have the same meaning for the consumer, may only be made where the product does not contain any added mono- or disaccharides or any other food used for its sweetening properties. If sugars are naturally present in the food, the following indication should also appear on the label: ‘CONTAINS NATURALLY OCCURRING SUGARS’.”

In an EU policy document⁴, the [EU Framework for national initiatives on selected nutrients, Annex II Added sugars](#), the following definitions are provided:

“In the scope of this annex, (total) sugars and added sugars are defined according to the European Food Safety Authority (EFSA)⁵: the term “sugars” covers monosaccharides and disaccharides, the term “added sugars” refers to sucrose, fructose, glucose, starch

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02011R1169-20180101>

² Definition provided in Annex I: ‘Sugars’ means all monosaccharides and disaccharides present in food, but excludes polyols

³ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02006R1924-20141213>

⁴ https://health.ec.europa.eu/publications/added-sugars-annex-eu-framework-national-initiatives-selected-nutrients_en

⁵ EFSA: Scientific Opinion on Dietary Reference Values for carbohydrates and dietary fibre. EFSA Journal 2010; 8(3):1462 [77 pp.]. EFSA Journal 2010; 8(3):1462

hydrolysates (glucose syrup, high-fructose syrup) and other isolated sugar preparations used as such or added during food preparation and manufacturing. Sugar alcohols (polyols) such as sorbitol, xylitol, mannitol, and lactitol, are usually not included in the term "sugars". In the scope of this annex, the term "added sugars" is additionally considered to include sugars present in honey, syrups, and fruit juices and fruit juice concentrates."

In 2022, the [European Food Safety Authority \(EFSA\)](#), the EU risk assessment body, published its 'Scientific opinion on tolerable upper intake level for dietary sugars'⁶. While this opinion is not part of EU food law, the EFSA definitions used are provided below for information:

"Added sugars include mono- and disaccharides added to foods as ingredients during processing or preparation at home, and sugars eaten separately or added to foods at the table; free sugars include added sugars plus sugars naturally present in honey, syrups, fruit juices and fruit juice concentrates."

Q2: Is the declaration of added sugars content voluntary or mandatory in your country? Please explain.			
<input type="checkbox"/> YES, VOLUNTARY	<input type="checkbox"/> YES, MANDATORY	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> OTHER

In the EU it is not possible to declare the content of added sugars; Regulation (EU) No 1169/2011 on the provision of food information to consumers requires the mandatory declaration of (total) sugars on prepacked food.

Q3: How is the declaration of added sugars verified or planned to be verified in your country? If you have information in this regard, please detail the methodology used or to be used and provide a link to it.
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Not applicable

Q4: Do you think it is important for Codex to define the term "added sugars"? Please explain.		
<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> OTHER

The EU does not consider it a priority to start new Codex work on a definition of "added sugars".

⁶ EFSA: Scientific Opinion on the tolerable upper intake level for dietary sugars. EFSA Journal 2022;20(2):7074, 337

The development of a definition at Codex level in order to inform consumers should be oriented at the health effects caused by the nutrient. Here, according to the EFSA Opinion of 2022⁷, the health effects of “added sugars” and “free sugars” do not differ. Some conclusions of the EFSA opinion are provided below for information:

“An Upper Limit or a safe level of intake for either total, added or free sugars could not be established.”

“The intake of added and free sugars should be as low as possible in the context of a nutritionally adequate diet. Decreasing the intake of added and free sugars would decrease the intake of total sugars to a similar extent.”

“The intake of dietary sugars is a well-established hazard in relation to dental caries in humans. However, a level of (total/added/free) sugars intake at which the risk of dental caries is not increased over the range of observed intakes could not be identified.”

“There is evidence for a positive and causal relationship between the intake of added and free sugars and risk of some chronic metabolic diseases. The level of certainty in the relationship is considered to be moderate for obesity and dyslipidaemia (>50–75% probability), low for NAFLD/NASH and T2DM (>15–50% probability) and very low for hypertension (0 – 15% probability), based on data from RCTs which investigated the effect of ‘high’ vs. ‘low’ sugars intake on surrogate disease endpoints, i.e. body weight, liver fat, fasting glucose, fasting triglycerides and SBP. However, a level of added/free sugars intake at which the risk of chronic metabolic disease is not increased over the range of observed intakes could not be identified.”

The EU is not in favor of establishing a new definition of “added sugars” for nutrition labelling purposes, for the following reasons:

To be meaningful, it should refer to “free/added sugars”, to reflect actual health effects.

However, given that “added sugars” and “free sugars” in prepacked foods on the market are in quantity similar to the quantity of total sugars, with the only exception of the sugars naturally present in milk and in whole/intact fruits and vegetables⁸, the introduction of a new nutrition labelling item that would differentiate between total sugars and added/free sugars is not justified.

⁷ EFSA: Scientific Opinion on the tolerable upper intake level for dietary sugars. EFSA Journal 2022;20(2):7074, 337

⁸ Total sugars comprise free (including added) sugars, plus sugars naturally present in milk and in intact fruits and vegetables. See EFSA infographic available at: <https://www.efsa.europa.eu/en/infographics/sugar-consumption-and-health-problems>

Q5: If your answer to question 4 is YES, which committee do you think, under its mandate, should develop such a definition? Please explain.

<input type="checkbox"/> Codex Committee on Food Labelling (CCFL)	<input type="checkbox"/> Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU)	<input type="checkbox"/> OTHER
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Not applicable

Q6: Do you think Codex should include added sugar on the nutrient declaration list? If yes, should it be mandatory or voluntary? Please explain.

<input type="checkbox"/> YES, VOLUNTARY	<input type="checkbox"/> YES, MANDATORY	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> OTHER
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See reply under Question 4.

Q7: Do you see any barriers or limitations to the development of the definition of "added sugars" under the CCFL? Please explain.

<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
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For the EU, in order to be meaningful, any definition of “added sugars” for nutrition labelling purposes should refer to “free/added sugars”, to reflect actual health effects. However, given that “added sugars” and “free sugars” in prepacked foods on the market are in quantity similar to the quantity of total sugars, with the only exception of the sugars naturally present in milk and in whole/intact fruits and vegetables⁹, the introduction of a new nutrition labelling item that would differentiate between total sugars and added/free sugars is not justified.

See also the reply provided under Question 4 for further information.

Q8: Provide additional suggestions that Codex should take into consideration regarding the definition of "added sugars".

⁹ Total sugars comprise free (including added) sugars, plus sugars naturally present in milk and in intact fruits and vegetables. See EFSA infographic available at: <https://www.efsa.europa.eu/en/infographics/sugar-consumption-and-health-problems>