

CODEX COMMITTEE ON FOOD LABELLING

48th Session
Québec City, Canada,
27 October – 1 November 2024

European Union Comments on

Agenda Item 13:

Sugar labelling – definition for “added sugars”

(CX/FL 24/48/13)

European Union Competence European Union Vote

The European Union (EU) would like to thank Costa Rica for the preparation of the Discussion paper on the establishment of a definition of added sugars (CX/FL 24/48/13).

The EU is not in favor of establishing a new definition of “added sugars”, to revise the *Guidelines on Nutrition Labelling* (CXG 2-1985) to add the definition of “added sugars” in section 2 of the Guidelines, and to include “added sugars” in the nutrient declaration in section 3.2 of the Guidelines.

In order to be meaningful, any definition of “added sugars” for nutrition labelling purposes should indeed refer to “free/added sugars”, to reflect actual health effects as the health effects of “added sugars”¹ and “free sugars”² do not differ. According to the opinion of the European Food Safety Authority (EFSA)³:

“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. [...] 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.”

¹ 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 (EFSA: Scientific Opinion on the tolerable upper intake level for dietary sugars. EFSA Journal 2022;20(2):7074, 337)

² Free sugars include added sugars plus sugars naturally present in honey, syrups, fruit juices and fruit juice concentrates (Source: see footnote 3)

³ 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

Furthermore, 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 vegetables⁴, the EU is not convinced that introducing a new nutrition labelling item would be justified to differentiate between total sugars and added/free sugars.

⁴ 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>