

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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ESTABLISHMENT OF A DEFINITION OF ADDED SUGARS

Comments in reply to CL 2023/94/OCS-FL

(Comments of Argentina, Brazil, Canada, Chile, Colombia, Costa Rica, Cuba, Cyprus, Ecuador, Egypt, European Union, Guatemala, Guyana, India, Indonesia, Iran, Iraq, Japan, Kenya, Malaysia, New Zealand, Norway, Paraguay, Peru, Philippines, Saudi Arabia, Singapore, South Africa, Tunisia, United Arab Emirates, United Kingdom, Uruguay, USA and Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB), AOCS - American Oil Chemists' Society, CEFS, ENCA, ENSA, FIVS, Food Industry Asia, FoodDrinkEurope, ICBA, ICGMA, IDF/FIL, IFT, IFU, International Association of Consumer Food Organizations, International Baby Food Action Network, International Special Dietary Food Industries, The Healthy Caribbean Coalition, World Federation of Public Health Associations, World Public Health Nutrition Association)

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/94/OCS-FL issued in November 2023. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

General comments

COMMENT	MEMBER / OBSERVER
Canada is pleased to submit the following comments in response to CL 2023/94-FL. Canada understands that the responses will serve as input for the preparation of a discussion paper for CCFL48.	Canada
Colombia tiene el agrado de presentar las siguientes respuestas frente a las preguntas de la Carta circular CL 2023/94- "Observaciones o información sobre el establecimiento de la definición de azúcares añadidos". Para efectos de lo anterior, se presentan en color azul las respuestas a las preguntas citadas.	Colombia
En Cuba se trabaja en implementar una política publica para disminuir el azúcar en los alimentos Se realizan campañas de educación alimentaria Esta contenido en nuestras Guías alimentarias el mensaje de no adicionar azúcar	Cuba
Norway would like to thank Costa Rica for preparing a discussion paper on this and for the opportunity to comment. We support consumers need for access to information about added sugars in all foods and drinks to be able to make informed decisions about their food choices. We therefore support the development of a discussion paper on added sugar. We are sorry to inform you that we have not been able to respond to the questions posed.	Norway
In the USA, this is covered under CFR Title 21, Volume 2, Part 101 (Food labeling).	AOCS - American Oil Chemists' Society
The European Plant-based Foods Association (ENSA) represents the interests of plant-based food manufacturers in Europe. ENSA is an association of internationally operating companies, ranging from large corporations to small, family-owned businesses with an annual turnover of around €1 billion. ENSA members produce high-quality plant-based alternatives to dairy and meat products. Since its establishment in 2003, ENSA has been raising awareness about the role of plant-based diet in moving towards more sustainable and healthier food consumption patterns.	ENSA
FIVS welcomes the opportunity to comment on the work conducted by CCFL on the establishment of a definition of added sugars. By way of background, FIVS is a global trade federation for the alcohol beverage industry since 1951, and a Codex Observer. We are committed to providing a venue and developing tools to encourage social, environmental, and economic sustainability among our members and the wider sector, in keeping with the United Nations Sustainable Development Goals. Our membership includes producers, importers, exporters, and trade associations (currently accounting for 75% of the wine traded globally). We also welcome and collaborate effectively with affiliates from allied industries.	FIVS
On behalf of its members, the International Council of Grocery Manufacturers Associations (ICGMA) welcomes this opportunity to provide comments in response to the Circular Letter CL 2023/94-FL requesting comments on the establishment of a definition of added sugars. About us The ICGMA represents the interests of national and regional associations which collaborate with all sectors of the consumer packaged goods industry. It is a council of international food, beverage and consumer product associations and is governed by a managerial secretariat. At this time, ICGMA does not have specific comments in response to the questions outline in the Circular Letter CL 2023/94-FL as we do not believe that establishing a definition for added sugars is within the mandate of the Codex Committee on Food Labelling (CCFL). This work would be best suited for the Codex Committee on Nutrition and Foods for Special Dietary Use (CCNFSDU).	ICGMA

Thank you for this opportunity to comment.	
IFT appreciates the opportunity to provide input on the subject of added sugar labeling to CCFL.	IFT
IBFAN is of the opinion that the term “added sugars” be defined and that “added sugars” be included on the nutrient declaration list and as a percentage ingredient declaration as mandatory requirements to provide full information for consumers to make informed food product choices.	International Baby Food Action Network

Specific comments

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). (YES / NO / UNDER DEVELOPMENT)

<p>Sí, Argentina cuenta con una definición. La definición de azúcares añadido en Argentina es la siguiente: Azúcares añadidos: Son los monosacáridos y disacáridos añadidos a los alimentos y las bebidas analcohólicas durante su elaboración y/o reconstitución de acuerdo con las instrucciones de preparación indicadas en el rótulo por el fabricante. Se encuentran incluidos los azúcares que están presentes naturalmente en la miel, los jarabes, jugos y concentrados de frutas y hortalizas. Dicha definición está establecida en el Artículo 2 del Decreto reglamentario N° 151/2022, de la Ley N° 27642. Además, la definición fue incorporada en el Artículo 225 del Código Alimentario Argentino (CAA), que obliga a su declaración en alimentos envasados, a través de la Resolución Conjunta N° 7/2022. Link a la Ley: https://www.boletinoficial.gob.ar/detalleAviso/primera/252728/20211112 Link al Decreto: https://www.boletinoficial.gob.ar/detalleAviso/primera/259690/20220323 Link al Capítulo V del CAA: http://www.conal.gob.ar/sitio/_pdf/20220926154204.pdf</p>	Argentina
<p>Yes. In Brazil, the definition of added sugars was established as part of the regulatory review of nutrition labelling requirements. The definition encompasses all monosaccharides and disaccharides added during food processing, including fractions derived from the addition of: a) sugar cane, beet sugar, and sugars from other sources. b) honey, molasses, treacle, rapadura, sugarcane juice, and malt extract. c) sucrose, glucose, fructose, lactose, and dextrose. d) inverted sugar, syrups, maltodextrins, and other hydrolyzed carbohydrates; and e) ingredients containing any of the mentioned above. The definition explicitly excludes sugars naturally present in milk and dairy products, as well as sugars naturally occurring in fruits and vegetables in various forms, such as whole, in pieces, powdered, dehydrated, in pulps, in purees, in integral juices, in reconstituted juices, and in concentrated juices. The regulation (RDC 429/2020) can be accessed in the following link: http://antigo.anvisa.gov.br/legislacao#/visualizar/434473</p>	Brazil
Q1: NO - Canada does not have a regulatory definition for added sugars.	Canada
P1: Respuesta: Si Primero que todo, Chile considera que no está claro el objetivo o propósito de este trabajo. En este contexto, se hace hincapié en la importancia de establecer de manera precisa el objetivo de dicho trabajo, como elemento fundamental para dirigir de manera eficaz, tanto los recursos, como los esfuerzos comprometidos en el trabajo futuro. Actualmente, tanto en los textos del Codex como en la	Chile

<p>regulación nacional, se pueden encontrar los conceptos tratados en esta pregunta. Si bien, no se explicita una definición de azúcares añadidos como otros conceptos, sí existe una declaración que hace referencia a los “azúcares añadidos”, y también existe una definición de azúcares. Por lo tanto, Chile entiende que en las regulaciones se emplean estrategias regulatorias que implican la introducción de conceptos y definiciones a lo largo del documento, facilitando la comprensión y establecimiento de un marco conceptual claro al elaborar un esquema. y que la comprensión de dichos conceptos se logra al considerar todas las demás definiciones presentes en la regulación y los textos del Codex vigente. En este sentido en el artículo N°120 del Reglamento Sanitario de los Alimentos (RSA), sobre uso y condiciones para declaración de descriptores nutricionales, se infiere el concepto de “azúcares añadidos”. RSA: (Link Descarga: https://dipol.minsal.cl/wp-content/uploads/2023/10/RSA-al-26-01-23.pdf) Descriptor “Sin azúcar/azúcares añadidos”: si no fue incorporada azúcar / azúcares como tal(es) o a través de un ingrediente con azúcar / azúcares añadidos. Este descriptor deberá ir acompañado de una frase tal como “este alimento no es libre en calorías”, con las mismas características gráficas del descriptor, cuando se utilice en alimentos a los que no les aplique el descriptor “libre”, “bajo” o “reducido” en calorías. Este descriptor no se aplica para azúcares de alcohol, es decir los alimentos que usen este descriptor podrán contener azúcares de alcohol. Además, se complementa con la definición de azúcares en el RSA que es: “Artículo N°383.- “Con el nombre de azúcares se entenderá a los carbohidratos endulzantes, monosacáridos y disacáridos refinados, concentrados y /o cristalizados, para efectos de rotulación, los que deberán rotularse con su nombre específico”.</p>	
<p>P1: SI. En Colombia, la Resolución 2492 de 2022 (Minsalud) define azúcares añadidos de la siguiente manera:</p> <p>Artículo 3. Definiciones</p> <p>(...) 3.7. Azúcares añadidos: son los azúcares adicionados o agregados, incluyendo a los azúcares que se adicionan durante el procesamiento de alimentos o se empaquetan como tales, e incluyen azúcares como monosacáridos y disacáridos, aquellos contenidos en los jarabes y los naturalmente presentes en la miel y en los concentrados de jugos de frutas o vegetales. Estos no incluyen los azúcares intrínsecos que se encuentran en la leche, frutas y los vegetales y los azúcares que son carbohidratos no glucémicos.</p> <p>Además, el artículo 32 de la Resolución 810 de 2021 (Minsalud) modificado mediante Resolución 254 de 2023 (Minsalud) establece:</p> <p>Artículo 32. Etiquetado frontal de advertencia</p> <p>(...) Tabla 17. Límites de contenidos de nutrientes para establecimiento de sello de advertencia</p> <p>(...) 32.1 Para la aplicación de la tabla anterior deberán tenerse en cuenta las siguientes reglas:</p> <p>(...) c. Se entenderá por producto alimenticio procesado o ultraprocesado envasado al que se le hayan adicionado azúcares aquellos que cumplan con la definición de azúcares libres, definidos en la Resolución 3803 de 2016, o en la que la modifique o sustituya.</p> <p>Resolución 3803 de 2016</p> <p>Azúcares libres: los azúcares libres incluyen los monosacáridos y los disacáridos añadidos intencionalmente a los alimentos y las bebidas por el fabricante, el cocinero o el consumidor (sacarosa, jarabe de maíz alto en fructosa, jarabe de malta, miel y melaza) más los azúcares naturalmente presentes en la miel, los jarabes, los jugos de frutas y los concentrados de jugos de frutas.</p> <p>Enlaces normativa asociada:</p> <p>Resolución 3803 de 2016</p> <p>https://www.minsalud.gov.co/Normatividad_Nuevo/Resoluci%C3%B3n%203803%20de%202016.pdf</p> <p>Resolución 810 de 2021</p>	<p>Colombia</p>

<p>https://www.minsalud.gov.co/Normatividad_Nuevo/Resoluci%C3%B3n%20No.%20810de%202021.pdf</p> <p>Resolución 2492 de 2022</p> <p>https://www.minsalud.gov.co/Normatividad_Nuevo/Resoluci%C3%B3n%20No.%202492de%202022.pdf</p> <p>Resolución 254 de 2023</p> <p>https://www.minsalud.gov.co/Normatividad_Nuevo/Resoluci%C3%B3n%20No.%20254%20de%202023.pdf</p>	
<p>EN DESARROLLO</p> <p>En el marco de la negociación centroamericana en materia de reglamentos de alimentos, se encuentra en proceso de revisión y actualización el Reglamento Técnico Centroamericano RTCA 67.01.60:10 Etiquetado Nutricional de Productos Alimenticios Preenvasados para Consumo Humano para población a partir de 3 años N°37295-COMEX-MEIC-S, el cual incluye una definición para azúcares añadidos (cabe indicar que, la actualización del RTCA está próxima al proceso de consulta pública nacional y ante OMC). A continuación, se presenta la propuesta de definición a incorporar:</p> <p>“Azúcares añadidos: cualquier tipo de azúcares agregados a un alimento, durante el procesamiento (por ejemplo: sacarosa, dextrosa, azúcares de jarabes, miel y azucares de jugos concentrados de frutas o vegetales).</p> <p>No incluyen los azúcares que naturalmente se encuentran en las concentraciones normales en la leche, las frutas y las verduras.”</p>	Costa Rica
<p>P1: No</p>	Cuba
<p>NO. There is no legal definition of “added sugars”. However, these are understood with respect to the conditions applying to the claim “WITH NO ADDED SUGARS” as given in Regulation (EC) no. 1924/2006.</p>	Cyprus
<p>En desarrollo. El Reglamento de Etiquetado de Alimentos se encuentra actualmente en revisión, y se ha visto la necesidad de incluir una definición de azúcares añadidos.</p>	Ecuador
<p>Yes,</p> <p>Egypt suggest sand supports the following definition: “Added sugars: Simple sugars of carbohydrates origin which have sweet taste and added to food as a sweetening agent”.</p> <p>References</p> <p>WHO definition: Added sugars include sugars added to food during food processing. Sugars used as a sweeteners and sugars from honey and concentrated fruit or vegetables juices. Added sugars don’t include naturally occurring sugars, such as sugars in the intact cell walls of fruit and vegetables, or sugars present in milk.</p> <p>FDA definition: Added sugars include sugars added to food during food processing (such as sucrose or dextrose), food packaged as sweeteners (such as table sugar), Sugars from syrups and honey, and sugars from concentrated fruit or vegetables juices.</p> <p>EU definition: “Sugars” covers monosaccharides and disaccharides, “Added sugars” refer to sucrose, fructose, glucose, starch hydrolysates (glucose syrup, high fructose syrup) and other isolated sugars preparations used as such or added during food preparation and manufacturing.</p>	Egypt
<p>No.</p> <p>In the European Union (EU), Regulation (EU) No 1169/2011 on the provision of food information to consumers provides for the mandatory nutrition declaration of (total) sugars 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.</p> <p>In the EU, Regulation (EC) No 1924/2006 on nutrition and health claims made on foods refers to the nutrition claim “with no added sugars”:</p> <p>“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</p>	European Union

<p>sweetening properties. If sugars are naturally present in the food, the following indication should also appear on the label: ‘CONTAINS NATURALLY OCCURRING SUGARS’.</p> <p>In an EU policy document , the EU Framework for national initiatives on selected nutrients, Annex II Added sugars, the following definitions are provided:</p> <p>“In the scope of this annex, (total) sugars and added sugars are defined according to the European Food Safety Authority (EFSA) : the term “sugars” covers monosaccharides and disaccharides, the term “added sugars” refers to sucrose, fructose, glucose, starch 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.”</p> <p>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’ . While this opinion is not part of EU food law, the EFSA definitions used are provided below for information:</p> <p>"Aded 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."</p>	
<p>Actualmente en Guatemala se encuentra en negociación el Reglamento Técnico Centroamericano de Etiquetado Nutricional, en la cual la definición de azúcares añadidos es “Azúcar agregado: Cualquier tipo de azúcar añadido a un alimento”, sin embargo, se puede considerar que aún está en negociación y que podría sufrir cambios en su redacción.</p>	Guatemala
<p>No</p>	Guyana
<p>Yes. It has been defined as : ‘added sugars’ means monosaccharides and disaccharides added to foods and beverages Reference: Food Safety and Standards (Labelling and Display) Regulations, 2020 Link: www.fssai.gov.in/upload/uploadfiles/files/Comp_Labelling.pdf</p>	India
<p>NO Rationale: Indonesia currently does not have any regulation that defines added sugars.</p>	Indonesia
<p>Yes. In the national standard of some products, the maximum amount of simple sugar in a product is specified. The Food and Drug Organization has also forced the amount of simple sugars in a product to be listed in the product label</p>	Iran
<p>Q1: NO</p>	Iraq
<p>Q1: NO</p>	Japan
<p>No. Although Kenya does not have a documented definition of added sugar, the need for the definition arose during the development of the Kenya National Nutrition Profile Model (KNPM) and draft Front of the Pack Nutrition labelling (FoPNL). However, due to the challenge of analysis of added sugar, Kenya chose to consider total sugars in both KNPM and FoPNL</p>	Kenya
<p>No</p>	Malaysia
<p>Yes - The Australia New Zealand Food Standards Code includes a definition for “added sugar(s)” for the purpose of making a voluntary “no added sugar(s)” and “unsweetened” claims about food. The Food Standards Code is available here: https://www.foodstandards.gov.au/food-standards-code/legislation. Standard 1.2.7 Nutrition, health and related claims provides information on requirements to make claims on food products. The definition for “added sugar(s)” can be found in the conditions or making a “no added sugar(s)” claim in Schedule 4 Nutrition, health and related claims and is included below.</p>	New Zealand

In December 2023, this definition for “added sugar(s)” was agreed to be updated (anticipated to be adopted early 2024). There is a four-year transition period for changes to “no added sugar(s)” and “unsweetened” nutrition content claims to be taken up.

Food Standards Australia New Zealand are also considering the inclusion of added sugars information in the nutrition information panel, with the aim of addressing the following problem:

Information about sugar provided on food labels in Australia and New Zealand does not provide adequate contextual information to enable consumers to make informed choices in support of dietary guidelines.

The definition for “added sugar(s)” is in scope for this work and as such there could be subsequent amendments to the definition adopted for “no added sugar” claims to ensure regulatory coherence across the two purposes (claims and declaration in the nutrition information panel).

Schedule 4-3 Conditions for no added sugar(s) claim

- a) The food for sale is not an added sugar
- b) The food for sale does not contain:
 - i. An added sugar as an added ingredient; and
 - ii. More sugars than:
 - A. 10 g/100g for solid food; or
 - B. 7.5 g/100mL for liquid food
- c) The food for sale has not had the concentration of hexose monosaccharides and disaccharides in that food increased by hydrolysis of carbohydrates during the production of the food
- d) Condition (c) does not apply if the concentration of hexose monosaccharides and disaccharides in that food is not > 1.5%.
- e) For the purposes of conditions (a) and (b), an added sugar means any of the following derived from any source:
 - i. hexose monosaccharides and disaccharides;
 - ii. low energy hexose monosaccharide D-tagatose;
 - iii. starch hydrolysate;
 - iv. glucose syrup;
 - v. maltodextrin and similar products;
 - vi. a product derived at a sugar refinery (including brown sugar, molasses, raw sugar, golden syrup, treacle);
 - vii. icing sugar;
 - viii. invert sugar;
 - ix. sugar and sugar syrup derived from plants;
 - x. honey;
 - xi. malt;
 - xii. malt extracts;
 - xiii. any of the following unless the food for sale is a prescribed beverage:
 - A. concentrated fruit juice;
 - B. concentrated vegetable juice;
 - C. deionised fruit juice;
 - D. deionised vegetable juice.
- f) For the purposes of condition (b), an ingredient includes an ingredient of a *compound ingredient.
- g) For the purposes of condition (e), a prescribed beverage means any of the following:
 - i. a brewed soft drink;
 - ii. a formulated beverage;
 - iii. a juice blend;
 - iv. a fruit drink;
 - v. a fruit juice;

vi. a vegetable juice; vii. a water-based beverage.	
No.	Paraguay
NO	Peru
NO Presently, the Philippines lacks a specific definition for added sugars.	Philippines
YES, Added sugars: Sugars that are added during food processing, or are packaged as such, and include sugars (mono- and disaccharides), sugars from syrup and honey, and sugars from fruit juice or vegetable concentrates that are in excess of what would be expected from the same amount of fruit juice or vegetables that are 100% of the same type. The definition stated above is in accordance with the technical regulation SFDA.FD/GSO 2233.	Saudi Arabia
NO. Singapore does not have a definition for “added sugar”. However, the criteria for the food industry to claim that a food product has “no added sugar” or is “without added sugar” is that “no free sugars or ingredients with added free sugar, honey, malt and malt extract, with the exception of sugar alcohols and sweetening substances, are added during processing” (source: Handbook on Nutrition Labelling for Singapore). For the definition of “free sugars”, Singapore takes reference from the WHO’s definition.	Singapore
Yes. Added sugar is defined in South Africa’s current Labelling Regulations, as follows: • “Added sugar” means any sugar added to foodstuffs during processing and includes but is not limited to sugars as defined by Regulations Relating to the Use of Sweeteners in Foodstuffs under the Act, honey, molasses, sucrose with added molasses, coloured sugar, fruit juice concentrate, de flavoured and/or deionised, fruit juice and concentrates thereof, high-fructose corn syrup and malt or any other syrup of various origins. Herewith South Africa’s definition of “added sugar” under development as part of the new Draft Food Labelling Regulations. • “Added or free sugar” means any food containing monosaccharides and disaccharides, added to foods and beverages during processing and production.	South Africa
Le texte actuel, à savoir l’arrêté des ministres du commerce et de l’artisanat, de la santé publique, de l’industrie, de l’énergie et des petites et moyennes entreprises du 3 septembre 2008, relatif à l’étiquetage et la présentation des denrées alimentaires préemballées ne prévoit pas une définition pour les sucres ajoutés. Ce texte est en cours de révision et prévoit une définition pour les sucres ajoutés.	Tunisia
Yes, https://moiat.gov.ae/en/services/	United Arab Emirates
YES. The voluntary sugar reduction programme that runs in the UK has a definition of added sugars. This is set out in the technical guidance document for the programme and is included below. It is not a mandatory or legislated definition. Added sugars includes all monosaccharides and disaccharides added to foods. For the purposes of this programme this includes: · cane sugar, brown sugar, crystalline sucrose, invert sugar, dextrose, molasses · sugars in honey, treacle and syrups such as malt syrup, fruit syrup, rice malt syrup, corn syrup, high fructose corn syrup, maple syrup, glucose syrup, glucose-fructose syrup · fructose, sucrose, glucose, lactose, hydrolysed lactose and galactose added as an ingredient · sugars in nectars such as coconut blossom nectar, date nectar, agave nectar	United Kingdom

<ul style="list-style-type: none"> · sugars in unsweetened fruit juices, fruit juice concentrate · sugars in fruit purees and jam Sugar naturally present in milk products, cereals, grains, nuts, seeds and fresh, dried and other processed fruits (other than purees and juices) is not considered added sugar. <p>Substances that are not included in the definition of sugar as it appears on the nutrition panel (ie not analytically sugar) are excluded, for example oligofructose and polyols. However, the setting of and monitoring progress towards the guidelines is carried out using data for total sugar (g sugar per 100g/ml). This is because labelling data is used and businesses are currently only required to provide data on total sugars in the nutrition declaration on packaging for food and drink. In addition, it may be more difficult and more costly (in terms of time taken and financial resource) for businesses to calculate added sugars content of foods, compared to total sugars. UK dietary recommendations are based on free sugars. The UK Scientific Advisory Committee on Nutrition in its 2015 report on carbohydrates and health, recommended that a new definition of free sugars should be adopted in the UK and that the population average intake of free sugars should not exceed 5% of total energy for adults and children aged 2 years and over (SACN, 2015). The definition of free sugars includes: all added sugars in any form including honey and syrups; all sugars naturally present in fruit and vegetable juices, spreads, purees and pastes, and similar products in which the structure has been broken down; all naturally occurring sugars in drinks (except for dairy-based drinks) and lactose and galactose added as ingredients. The sugars naturally present in milk and dairy products, fresh and most types of processed fruit and vegetables and in cereal grains, nuts and seeds are excluded from the definition (Swan et al. 2018). Intakes of free sugars in the UK are monitored through the National Diet and Nutrition Survey. Free sugars values for composite foods with more than one source of sugar, for use in the nutrient databank for the UK National Diet and Nutrition Survey, are estimated using a recipes database and assigning a free sugars value to each ingredient based on the published definition. For example, a sugar sweetened yogurt with strawberry has the ingredients “yogurt” (85%), “strawberry puree” (10%) and “table sugar” (5%). Strawberry puree has a total sugars content of 9.7g/100g, so 9.7g/100g was assigned to the “free sugars in fruit puree” component. Table sugar has a total sugars content of 100g/100g, so all of the sugar was assigned to the “free sugars from added sugar” component. Plain yogurt has no free sugars.</p>	
<p>SI - Decreto 272/018 - Rotulado Frontal - la definición que en el mismo figura es de azúcares agregados y es el siguiente: “Agregado de azúcares: Se refiere al agregado, durante el proceso de elaboración, de: a. azúcares; b. azúcares de hidrólisis de polisacáridos; c. miel; d. ingredientes que contengan agregado de cualquiera de los anteriores”.</p>	Uruguay
<p>Yes. The United States uses the following definition for added sugars: Added sugars are either added during the processing of foods, or are packaged as such, and include sugars (free, mono and disaccharides), sugars from syrups and honey, and sugars from concentrated fruit or vegetable juices that are in excess of what would be expected from the same volume of 100 percent fruit or vegetable juice of the same type, except that fruit or vegetable juice concentrated from 100 percent juices sold to consumers, fruit or vegetable juice concentrates used towards the total juice percentage label declaration under § 101.30 or for Brix standardization under § 102.33(g)(2) of this chapter, fruit juice concentrates which are used to formulate the fruit component of jellies, jams, or preserves in accordance with the standard of identities set forth in §§ 150.140 and 150.160 of this chapter, or the fruit component of fruit spreads shall not be labeled as added sugars. The definition can be found in our Code of Federal Regulations General Provisions on Food Labeling Section 101.9(c)(6)(iii) at the following link: https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/cfrsearch.cfm?fr=101.9</p>	USA
<p>ALAIAB considera que esta pregunta debe ser respondida por los gobiernos</p>	Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB)
<p>NO. The existing EU regulatory framework does not provide a definition for added sugars.</p>	CEFS

<p>ENCA is of the opinion that the term “added sugars” needs a definition and that “added sugars” be included on the nutrient declaration list and as a percentage in the ingredient declaration as mandatory requirement to provide full information for consumers to make informed food product choices.</p>	<p>ENCA</p>
<p>No. The EU regulatory framework* does not provide for a definition of added sugars. However, the European Food Safety Authority (EFSA), in its scientific opinion on Dietary Reference Values for carbohydrates and dietary fibre (EFSA 2010a), refers to added sugars as 'sucrose, fructose, glucose, starch hydrolysates (glucose syrup, high-fructose syrup) and other isolated sugar preparations used as such or added during food preparation and manufacturing.*EU regulations are of general application, binding in their entirety and are directly applicable in all 27 EU Member States. The regulations supersede national laws incompatible with their substantive provisions and are designed to ensure the uniform application of Union law in all the Member States.</p>	<p>ENSA</p>
<p>N/A</p>	<p>FIVS</p>
<p>In India, “added sugars” are defined as monosaccharides and disaccharides added to foods and beverages as stipulated under Regulation 5(3)(a)(i) of the Food Safety and Standards (Labelling and Display) Regulations, 2020 [https://www.fssai.gov.in/upload/uploadfiles/files/Comp_Labelling.pdf]. Malaysia, on the other hand, refer to “Sugars” as all monosaccharides and disaccharides contained in food either naturally occurring or added.</p> <p>Philippines has developed a Nutrient-Profile Model for Promoting Healthy Diet [https://foodindustry.asia/hubfs/Industry%20consultation/PH%20FDA/PNPM/PNPM%20PAHO%20based%20Users%20Guide_for%20review_Consult2.pdf]. Within the framework, “added sugars” are defined as free sugars added to foods and beverages during manufacturing or home preparation. “Free sugars” are hereby referred to as monosaccharides and disaccharides added to foods and beverages by the manufacturer, cook, and/or consumer plus sugars that are naturally present in honey, syrups and juices.</p> <p>Brunei, Cambodia, China, Indonesia, Laos, Myanmar, Singapore, Thailand and Vietnam do not have a definition for “added sugars”.</p>	<p>Food Industry Asia</p>
<p>NO. The EU regulatory framework does not provides for a definition of “added sugars”.</p>	<p>FoodDrinkEurope</p>
<p>We defer to members who have regulatory definitions (e.g. USA, Brazil, Singapore, etc.) to respond.</p>	<p>ICBA</p>
<p>The International Dairy Federation (IDF), as an observer, would like to highlight that the World Health Organization (WHO) has a Guideline on sugars (Guideline: sugars intake for adults and children), providing guidance and recommendations on free sugar intake. In the Guideline, the term ‘free sugars’ refers to “monosaccharides and disaccharides added to foods by the manufacturer, cook or consumer, and sugars naturally present in honey, syrups, fruit juices and fruits juice concentrates”. This definition does not include naturally present sugars such as lactose in dairy. Naturally occurring sugars in milk were intentionally excluded from the WHO recommendations because there was no reported evidence of adverse effects of consumption</p>	<p>IDF/FIL</p>
<p>IFT has membership globally, so we are sharing here the definition from both the US and EU. For the US, the definition is laid down in the Code of Federal Regulations, Title 21, Section 101.9.</p> <p>Added sugars are either added during the processing of foods, or are packaged as such, and include sugars (free, mono and disaccharides), sugars from syrups and honey, and sugars from concentrated fruit or vegetable juices that are in excess of what would be expected from the same volume of 100 percent fruit or vegetable juice of the same type.</p> <p>(Ref: https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/cfrsearch.cfm?fr=101.9)</p> <p>There is also with FDA a definition for “no added sugar” as a claim: CFR - Code of Federal Regulations Title 21 (fda.gov)</p>	<p>IFT</p>

<p>In the EU, definitions are established in respect of additive use (in the context of additives permitted in foods with “no added sugars”) and nutrition claims (for the claim “no added sugars”).</p> <p>(Refs: https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:354:0016:0033:en:PDF; https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02006R1924-20141213)</p>	
<p>The HCC represents civil society organisations across the 15 Member States and 5 Associate Member States of CARICOM (Caribbean Community). We are not aware of any CARICOM countries with definitions of added sugars contained within national dietary guidelines.</p>	<p>The Healthy Caribbean Coalition</p>
<p>The World Federation of Public Health Associations is a global representative body and therefore does not respond from the perspective of a single jurisdiction.</p> <p>This notwithstanding we would like to provide links to two relevant publications that synthesise and test added sugars definitions currently being used in global policy. There publications highlight the significance of adopting a comprehensive definition of added sugars to protect consumers from all forms of sugar linked to adverse health outcomes.</p> <p>The first, a report by The George Institute for Global Health and VicHealth in Australia, distils ten relevant definitions for added sugars. Four of these are from national food labelling regulations (USA, Canada, Uruguay and Mexico), and six are from reports or guidelines (WHO, PAHO, EDFA, Public Health England and the American Health Association). The Report synthesises similarities and difference between these definitions, and also evaluates existing health evidence for including specific types of sugars that may be on the edges of regulation. The report was prepared to inform Australia’s current consideration of a definition of added sugars and is available in full online here: https://www.georgeinstitute.org/our-impact/policy-and-recommendations/supporting-evidence-informed-policy-work-on-added-sugars</p> <p>Secondly, on 24 January 2024 a new research paper was published by Coyle et al in Current Developments in Nutrition. This paper tests the policy implications of adopting three different added sugars definitions on the Australian food supply. It also publishes an updated method for estimating added sugars in packaged foods when this information is not on the pack. The three definitions tested are the US FDA definition (least comprehensive), the WHO free sugars definition, and an updated ‘comprehensive’ definition developed by the researchers. Findings show the implications of adopting a more comprehensive definition – around 7% more foods would need to display added sugars information. Foods that would be most impacted by adoption of a more comprehensive definition were mostly beverages, foods for young children, and processed fruit and vegetable products. The sugars responsible for this extra coverage were dried fruit, and fruit and veg pastes, purees and powders. The press release was reported here: https://medicalxpress.com/news/2024-01-added-sugar-good-job.html, and the published paper will be available here shortly: https://dx.doi.org/10.1016/j.cdnut.2023.102058</p>	<p>World Federation of Public Health Associations</p>
<p>As a global organisation, we consider the definition of “ added sugar” needs to be defined, and it is a key component to be disclosed in a comprehensive nutritional labelling.</p> <p>There is a key distinction between naturally occurring sugars found in foods and beverages like fruits, vegetables and dairy products and those that are added to foods and beverages during processing and preparation. The George Institute report here includes ten relevant definitions: four from national food labelling regulations (USA, Canada, Uruguay, Mexico) and six from reports or guidelines of WHO, PAHO, EDFA, Public Health England and the American Health Association that can help to support the Codex definition. We suggest using the WHO’s definition: “sugars that are added to food during food processing, sugars used as sweeteners, and sugars from honey and concentrated fruit or vegetable juices. Added sugars do not include naturally occurring sugars, such as sugars in the intact cell walls of fruit and vegetables or those in (unflavoured) milk.”</p>	<p>World Public Health Nutrition Association</p>

Q2: Is the declaration of added sugars content voluntary or mandatory in your country? Please explain.

(YES, VOLUNTARY / YES, MANDATORY / NO / OTHER)

<p>YES, MANDATORY. In Brazil, the declaration of added sugars is required as mandatory in both the nutrient declaration and the front-of-pack nutrition labelling.</p>	Brazil												
<p>Q2: NO - Canadian regulations require the declaration of "Total Sugar" in the Nutrition Facts table (nutrition labelling). The declaration of added sugars content in the Nutrition Facts table is prohibited.</p> <p>However, a voluntary "no added sugar" claim is permitted on food labels provided it meets applicable criteria that can be viewed at: Nutrition labelling: Table of permitted nutrient content statements and claims - Canada.ca https://www.canada.ca/en/health-canada/services/technical-documents-labelling-requirements/table-permitted-nutrient-content-statements-claims/table-document.html#a5</p>	Canada												
<p>P2: Respuesta: OTRO En nuestro país no es obligatorio declarar en la tabla nutricional el contenido de "azúcares añadidos" como tal. Sin embargo, existen empresas que si declaran su contenido en algunos productos, voluntariamente. Por otra parte, la declaración del contenido de azúcares totales en productos alimenticios se aplica de forma obligatoria, de acuerdo con las regulaciones establecidas en los artículos N° 115, 116, 120 y 120 bis. En el primero, se establecen requisitos para la declaración de nutrientes, y posteriormente las condiciones para realizar las declaraciones de propiedades nutricionales o saludables relacionadas con carbohidratos en productos alimenticios, según sea el caso. Asimismo, se destaca que el concepto de "azúcares añadidos" (Artículo N°120 bis) se utiliza como uno de los criterios para evaluar el cumplimiento de las normativas de rotulación relacionadas con los productos considerados "ALTO EN AZÚCARES".</p>	Chile												
<p>SÍ, OBLIGATORIA. En Colombia se establece la obligatoriedad de la declaración de azúcares añadidos. Al efecto, la Resolución 810 de 2021 (Minsalud) señala dentro de su articulado lo siguiente:</p> <p>Artículo 10. Condiciones generales para la declaración de nutrientes</p> <p>(...) "10.7 Nutrientes de declaración obligatoria:</p> <p>Deberán declararse obligatoriamente en la tabla nutricional, el valor energético y las cantidades de los nutrientes que se indican a continuación, por 100 g del alimento y por porción para alimentos sólidos, y por 100 ml de producto y por porción para alimentos líquidos y con lo establecido en el artículo 9o, del presente reglamento técnico. En el caso de productos reconstituidos se declarará considerando el producto preparado en condiciones de consumo recomendadas por el fabricante.</p> <p>Tabla 3. Formas de expresión de los nutrientes de declaración obligatoria</p> <p>(...)</p> <table border="1" data-bbox="120 1153 826 1289"> <thead> <tr> <th>Nutriente</th> <th>Forma de expresión</th> <th>Requisitos adicionales</th> </tr> </thead> <tbody> <tr> <td>(...)</td> <td></td> <td></td> </tr> <tr> <td>Azúcares añadidos</td> <td>Debe expresarse en gramos</td> <td>-</td> </tr> <tr> <td>(...)</td> <td></td> <td></td> </tr> </tbody> </table> <p>Artículo 28. Condiciones específicas (de la Tabla de Información Nutricional)</p> <p>(...) 28.4 Los datos nutricionales deben aparecer en el siguiente orden: calorías, grasa total, grasa saturada, grasa trans, carbohidratos, fibra dietaria, azúcares totales, azúcares añadidos, proteína, y sodio. Los nombres y sus datos nutricionales de los siguientes nutrientes: calorías, sodio, grasa saturada, grasas trans y azúcares añadidos, deben estar en negrilla y tener la letra 1.3 veces más grande en tamaño que las</p>	Nutriente	Forma de expresión	Requisitos adicionales	(...)			Azúcares añadidos	Debe expresarse en gramos	-	(...)			Colombia
Nutriente	Forma de expresión	Requisitos adicionales											
(...)													
Azúcares añadidos	Debe expresarse en gramos	-											
(...)													

demás. En el caso de que solo sean declaradas las Vitaminas y minerales de obligatoria declaración, el orden será: Vitamina A, Vitamina D, Hierro, Calcio y Zinc, de lo contrario, si se declaran más vitaminas y minerales, entonces seguirán el orden de aparición como el de la Tabla 9.	
OTRO En concordancia con la respuesta a la pregunta No. 1, una vez entre en vigencia la revisión del “RTCA de Etiquetado Nutricional de Productos Alimenticios Preenvasados para Consumo Humano para población a partir de 3 años N°37295-COMEX-MEIC-S”, la declaración del contenido de azúcares añadidos será de carácter obligatorio.	Costa Rica
P2.No	Cuba
YES, VOLUNTARY OTHER The nutrition declaration on prepacked food should include information on the (total) amount of sugars per 100g. It is not mandatory however to distinguish which of these are added sugars and which naturally occurring.	Cyprus
NO. La normativa vigente determina la declaración obligatoria de azúcares totales.	Ecuador
In the present time of Egypt: 1) Declaring of added sugars content is voluntary on prepackaged food 2) Declaring of added sugars content is mandatory on prepackaged foods for Special Dietary Uses.	Egypt
No. 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.	European Union
Comentarios: Actualmente el RTCA de Etiquetado Nutricional permite la declaración del contenido de azúcares añadidos de aplicación voluntaria.	Guatemala
Yes, Voluntary	Guyana
In India, it is mandatory to declare added sugars in Nutritional information on pre-packaged foods. Reference: Food Safety and Standards (Labelling and Display) Regulations, 2020 Link: https://fssai.gov.in/upload/uploadfiles/files/Comp_Labelling.pdf	India
NO Rationale: Indonesia does not have any regulations governing the provisions of added sugars.	Indonesia
Yes, mandatory. Food law should be mandatory for everyone to follow. Because consumer health is the right of the public. If some producers do not mention the amount of added sugar and some mention it, inequality is created.	Iran
Q2 : YES MANDATORY	Iraq
Q2:NO	Japan
YES, MANDATORY: The national nutrition labelling standards require mandatory declaration of total sugars	Kenya

<p>No.</p> <p>In Malaysia it is only mandatory to declare the amount of 'Total sugars'. The declaration should be made available in the Nutrition Information Panel/ Nutrition Facts on the label</p>	<p>Malaysia</p>
<p>Yes - voluntary/ Under development</p> <p>In New Zealand the declaration of added sugars content and nutrition content claims about the presence or absence of added sugar is voluntary. Any voluntary declarations must comply with relevant conditions in Standard 1.2.7 Standard 1.2.7 Nutrition, health and related claims of the Australia New Zealand Food Standards Code.</p> <p>Food Standards Australia New Zealand are currently undertaking work on a proposal to require the inclusion of added sugars content in the nutrition informal panel. This work is still ongoing and is expected to be completed in 2024.</p>	<p>New Zealand</p>
<p>No se aplica tal declaración.</p>	<p>Paraguay</p>
<p>Si, voluntario. Comentario: La declaración de nutrientes en general tiene carácter voluntario.</p>	<p>Peru</p>
<p>Not applicable.</p> <p>The declaration of added sugars content is not mandatory in the Philippines. Moreover, since there is no definition for added sugars, the Philippines requires only the declaration of Total Sugars in the Nutrition Facts of processed food products.</p>	<p>Philippines</p>
<p>YES, MANDATORY</p> <p>Yes, it is mandatory as all added sugars in food products should be declared in accordance with the technical regulation SFDA.FD/GSO 2233.</p>	<p>Saudi Arabia</p>
<p>YES, MANDATORY.</p> <p>In Singapore, it is mandatory for food business to provide the nutrition information for beverages that are intended for sale to consumers, beverages unless otherwise exempted. The information has to be provided via a nutrition information panel (NIP), with total sugar declared as a mandatory component. Added sugars, including lactose and galactose may be voluntarily declared as sub-groups of the total sugar component. For prepacked beverages, the NIP would already be printed on the label.</p> <p>For beverages that are prepared onsite when and order is placed, the NIP would be made available using the follow means:</p> <ul style="list-style-type: none"> - Displayed on or near to the automated beverage dispenser - Physical document (e.g. Pamphlet) that is shown or given to the purchase on request - Website or other electronic record viewable by the purchaser 	<p>Singapore</p>
<p>It is Mandatory.</p> <ul style="list-style-type: none"> • In South Africa, the declaration of added sugars content in the nutrient declaration list is mandatory. Added sugars are required to be declared as part of total sugars in the nutrient declaration list. 	<p>South Africa</p>
<p>Actuellement, l'arrêté des ministres du commerce et de l'artisanat, de la santé publique, de l'industrie, de l'énergie et des petites et moyennes entreprises du 3 septembre 2008, relatif à l'étiquetage et la présentation des denrées alimentaires préemballées n'exige pas la déclaration de la teneur en sucres ajoutés. Elle sera obligatoire une année après la publication de l'arrêté en cours de révision.</p>	<p>Tunisia</p>
<p>yes mandatory.</p>	<p>United Arab Emirates</p>

<p>NO. UK legislation requires a nutrition declaration that must include sugars. The legislative definition of sugars in this context is: “ ‘sugars’ means all monosaccharides and disaccharides present in food, but excludes polyols”. This includes all naturally occurring monosaccharides and disaccharides in food and drink as well as what has been added by the food business operator. Nutrition claims that state sugars have not been added to a food where the product does not contain any added mono- or disaccharides or any other food used for its sweetening properties, and any claim likely to have the same meaning for the consumer as listed in the Annex of Retained Regulation (EC) No 1924/2006 (as amended by the Nutrition (Amendment etc.) (EU Exit) Regulations 2019 and the Nutrition (Amendment etc.) (EU Exit) Regulations 2020). and included in the Great Britain Nutrition and Health Claims Register.</p>	<p>United Kingdom</p>
<p>NO - En la normativa de etiquetado nutricional vigente Decreto N° 117/006 no figuran ni están definidos los azucares añadidos.</p>	<p>Uruguay</p>
<p>Yes, mandatory. The United States has had a regulatory definition and mandatory declaration of added sugars since 2021. In the United States, dietary intake data shows that consumption of added sugars exceeds the national dietary guideline of 10 percent of total calorie intake. The mandatory declaration is based on the need for further information about added sugars on the label to assist consumers to maintain healthy dietary practices and to understand the relative significance of added sugars in the context of a total daily diet, which consumers cannot calculate based on the other information on the label—such as total sugars or ingredients. Providing consumers with information about the added sugars content of food promotes public health by ensuring that they have information to assist them in meeting nutrient needs within calorie limits and in constructing a healthy dietary pattern that is limited in added sugars to reduce the risk of cardiovascular disease.</p>	<p>USA</p>
<p>ALAIAB considera que esta pregunta debe ser respondida por los gobiernos</p>	<p>Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB)</p>
<p>NO. Same as in question Q1. No regulatory framework at EU level for the declaration of added sugars content.</p>	<p>CEFS</p>
<p>NO. According to EU Regulation (EU) No 1169/2011 on food information to consumers no other sugar than “total sugars” (which is mandatory) is allowed in the nutrition declaration.</p>	<p>ENSA</p>
<p>N/A</p>	<p>FIVS</p>
<p>In India, the amount of added sugars must be declared within the nutrition information panel as stipulated under Regulation 5(3)(b)(i)(B) of the Food Safety and Standards (Labelling and Display) Regulations, 2020 [https://www.fssai.gov.in/upload/uploadfiles/files/Comp_Labelling.pdf]. Additionally, the recommended daily allowance for added sugar, calculated based on a 2000 kcal energy intake, is 50 g for the average adult.</p> <p>In Singapore, added sugars can be declared voluntarily in the nutrition information panel as seen in Figure 1b of the A Handbook on Nutrition Labelling [https://www.hpb.gov.sg/docs/default-source/newsroom/a-handbook-on-nutrition-labelling-(singapore)-_june-2020.pdf?sfvrsn=b232e5ec_2].</p> <p>Brunei, Cambodia, China, Indonesia, Laos, Malaysia, Myanmar, Philippines and Thailand do not have provision for the declaration of “added sugars” currently. Vietnam is in the process of developing a regulation to mandate nutrition labelling for all prepackaged food products. In the latest version of the draft circular, there is no provision for declaring “added sugar”.</p>	<p>Food Industry Asia</p>
<p>NO. Regulation (EU) No 1169/2011 on food information to consumers provides for the labelling of total sugars in a product.</p>	<p>FoodDrinkEurope</p>
<p>OTHER. We defer to members to respond.</p>	<p>ICBA</p>

Not applicable	IDF/FIL
In the USA, the declaration is mandatory, in the EU, the declaration "added sugars" is not permitted. USA declaration regulation: (Ref: https://www.fda.gov/food/food-labeling-nutrition/changes-nutrition-facts-label).	IFT
We do not know if a declaration of added sugars is mandatory in any of the CARICOM counties however it is unlikely.	The Healthy Caribbean Coalition
The World Federation of Public Health Associations does not represent a specific jurisdiction. As an editorial matter, we would ask for clarity around what the 'declaration of added sugars' means in this context, and whether it is limited to the quantification of added sugars in the nutrition declaration, or also related claims e.g. 'no added sugars' on pack. Ideally, WFPHA would like to see a single definition of added sugars adopted for this purpose. We advocate for mandatory quantification and declaration of added sugars in the nutrient declaration, and utilisation of the same definition to guide the voluntary use of 'no added sugars' claims on pack.	World Federation of Public Health Associations
Many countries have legislation that governs the voluntary use of added sugars claims on packages. The disclosure of added sugars in the nutrition fact label in many countries is still voluntary, but for example, in the US, it has been mandatory since 2016 and updated in 2023	World Public Health Nutrition Association

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.

Sí, la declaración de los azúcares añadidos es obligatoria. El Artículo 8 del Decreto N° 151/2022, establece que la declaración del contenido de azúcares totales y azúcares añadidos es obligatoria para todos los alimentos y bebidas analcohólicas envasados en ausencia del cliente, que se comercialicen en el territorio nacional independientemente de su origen y que deban llevar información nutricional conforme a las normas específicas del Código Alimentario Argentino (CAA).	Argentina
Comentarios: La verificación de la declaración obligatoria de azúcares añadidos se realiza a través de una declaración jurada, la cual fue establecida en el Artículo 3 de la Disposición N° 2673/2022. Link de acceso a la Disposición N° 2673/2022: https://www.boletinoficial.gob.ar/detalleAviso/primera/260773/20220411	Argentina
The verification of added sugar can be conducted analytically or through documentation evaluation. Brazilian legislation requires the food industry to maintain updated documents regarding the determination of the nutritional value of their foods and to provide these documents to authorities upon request. In addition, the legislation establishes that suppliers of raw materials and ingredients must provide the nutrition information and the list of ingredients of their products to assist manufacturers in the accurate determination of the nutritional value of their products, including the content of added sugar. For foods in which the amount of added sugars equals the amount of total sugars, routine analytical methods applied for total sugars are deemed appropriate and sufficient for assessing the added sugar content. When the added sugars content is less than the total sugars content, it may be necessary to supplement analytical results with documentary evaluation, including consistency with the product's ingredient list and the documentation provided by the food industry.	Brazil

<p>Q3: The question is not applicable, since there is currently no declaration of added sugars in nutrition labelling in Canada.</p> <p>Additionally, analytically there is no way to distinguish the source of sucrose between naturally occurring and added sugars in multi-ingredient foods, and so levels would need to be calculated manually using product formulas and the specific ingredients added. However, there are a number of food manufacturing reactions (e.g. the Maillard reaction, sugar caramelization, fermentation, etc.) in which sugars are converted to non-sugar intermediate or end products, resulting in substantial deviation from the initial quantities identified in manufacturers' recipes and the final product.</p>	Canada
<p>P3 Respuesta: N/A Es importante destacar que los azúcares añadidos no presentan diferencias detectables analíticamente con los azúcares naturalmente presentes en alimentos como la fruta y la leche, lo que complica la distinción entre azúcares agregados y naturales mediante métodos analíticos, sobre todo en los casos en que el producto tenga como ingredientes dichos productos. Por lo tanto, la falta de métodos analíticos de verificación específicos que los distingan, en aquellos casos que corresponda, dificultaría la declaración precisa de azúcares añadidos en ese tipo de productos, cuestión que no sería una limitante en los casos en que todos los azúcares que contenga el alimento sean añadidos. En todo caso en las situaciones en las que ambos tipos de azúcares están presentes en los alimentos, los fabricantes deben mantener registros detallados para respaldar la veracidad de la declaración de azúcares añadidos. En este caso, las verificaciones se llevan a cabo principalmente a través de la declaración de la lista de ingredientes y la descripción proporcionada en las fichas técnicas de los productos evaluados. En algunos casos, también se recurre a análisis de laboratorio para corroborar la información.</p>	Chile
<p>En Colombia se realizan cálculos teóricos con base en información de formulación/composición suministrada por los fabricantes y soportada en registros, fichas técnicas y documentos de fabricación y también de manera analítica. Sin embargo, la metodología empleada para la verificación de los azúcares añadidos en Colombia no se encuentra soportada formalmente a través de la definición de un método analítico para determinar el contenido de los azúcares añadidos que son declarados en la tabla nutricional. Los azúcares agregados no son químicamente diferentes de los azúcares que se encuentran naturalmente en alimentos como la fruta y la leche, lo que dificulta distinguir entre los azúcares agregados y los que se encuentran naturalmente utilizando métodos analíticos. No existe un método analítico (AOAC u otro) que permita distinguir los azúcares intrínsecos de los añadidos.</p>	Colombia
<p>La verificación la realiza el Ministerio de Salud mediante revisión y análisis de Etiquetado Nutricional en el mercado. Cabe indicar que el Instituto Costarricense de Investigación y Enseñanza en Nutrición y Salud (INCIENSA) es el laboratorio oficial del Ministerio de Salud. Dicho laboratorio cuenta con métodos analíticos que cuantifican el contenido total de azúcares presentes, pero no diferencian si se trata de añadidos exclusivamente. De manera general se puede indicar que, a la fecha se utilizan métodos de estimación (https://pubmed.ncbi.nlm.nih.gov/255148967), pero la veracidad de la estimación recae principalmente en el productor que posee la formulación del producto e información de las materias primas utilizadas.</p>	Costa Rica
<p>P3.No contamos</p>	Cuba
<p>Not applicable.</p>	Cyprus
<p>Una vez oficializada la actualización de la regulación de etiquetado de alimentos, corresponde a la Agencia Nacional de Regulación, Control y Vigilancia Sanitaria-ARCSA, instancia adscrita al Ministerio de Salud Pública desarrollar o adoptar la metodología correspondiente.</p>	Ecuador
<p>Egypt proposes the declaration of added sugars verified with the nutrition factson prepackaged foods for Special Dietary Uses.</p>	Egypt
<p>Not applicable</p>	European Union
<p>Actualmente de acuerdo a la legislación vigente, el Reglamento Técnico Centroamericano de Etiquetado Nutricional es de aplicación voluntaria, por lo cual la autoridad sanitaria no tiene establecida una metodología para la verificación de los azúcares añadidos.</p>	Guatemala

The guidance to the verification of added sugars in food products is not built in the regulation. Added sugars are not chemically different to sugars naturally occurring in foods such as those in fruit and milk, which makes it difficult to distinguish between added and naturally occurring sugars using analytical methods. Hence, regulatory purpose verification methods are lacking for the determination of added sugar for labelling purposes.	India
Food manufacturers inform the Food and Drug Organization of Iran, the formulation of the product that includes the amount of simple sugars, the answer of the laboratory that measured the amount of simple sugars in the product, and the label of the product that states the amount of sugar.	Iran
Lane Eynon method	Iraq
The declaration through Nutrition Information Panel/ Nutrition Facts on the label.	Malaysia
The Australia New Zealand Food Standards Code does not specify methodology for determining added sugars content in food. In New Zealand (and Australia) it is the responsibility of the supplier to ensure that any claims on their foods are truthful, not misleading and can be substantiated. Any voluntary declaration about “added sugar(s)” will most likely be validated by recipe calculation as no analytical methods exist to determine the amount of “added sugar” as distinct from total sugar.	New Zealand
Actualmente no se tiene planificado la declaración ni verificación de los azúcares añadidos.	Paraguay
Comentario: No está establecida la forma de verificación.	Peru
The declaration of added sugars is not required hence, it is not verified. Product registration is required in the Philippines, where submission of product formulation, ingredients list, and Certificate of Analysis (COA) are among the requirements. The COA reflects the only the total sugars, as well as individual sugars (glucose, fructose, etc.) in the food. It does not specifically indicate whether the sugars are added or inherent to the food.	Philippines
The main issue is that added sugars are not chemically different from those naturally occurring in foods such as fruit and milk. As a result, it is difficult to distinguish between added and naturally occurring sugars using analytical methods. However, in the Kingdom of Saudi Arabia, during the inspection process the following are considered: <ul style="list-style-type: none"> • Manufacturers have to disclose the product recipe or technical data sheet, as it may contain undisclosed added sugars not listed on the nutrition label. • Verifying whether the product ingredients includes fruit concentrates not explicitly mentioned in the product name. • Conducting laboratory analysis to identify forms of sugar added to food products to differentiate between natural sugar from the added one. 	Saudi Arabia
Singapore currently does not verify the accuracy of the declaration of added sugar. Based on past feedback received, the most common issue encountered would be on the accuracy of total sugar content in beverages which can be verified via lab analysis.	Singapore
<ul style="list-style-type: none"> • According to current Labelling Regulations, added sugar is verified using the ingredient list. • With regards to the verification of added sugars, the current SA Labelling Regulations do not specify the methods of analysis and what needs to be analysed. There is a need for guidance from CODEX for further update to the SA Draft Labelling Regulations 	South Africa
En Tunisie, l'Instance Nationale de la Sécurité Sanitaire des produits Alimentaires est en charge de contrôler l'application de l'arrêté des ministres du commerce et de l'artisanat, de la santé publique, de l'industrie, de l'énergie et des petites et moyennes entreprises du 3 septembre 2008, relatif à l'étiquetage et la présentation des denrées alimentaires préemballées et particulièrement l'application des déclarations nutritionnelles. La déclaration des sucres ajoutés (qui est volontaire actuellement) se fait par analyse, selon le cas par dosage titrimétrique ou chromatographique.	Tunisia
https://www.adafsa.gov.ae/English/PolicyAndLegislations/Guidelines/Documents/Health,%20Nutrition%20and%20Related%20Claims%20Cop.pdf https://u.ae/en/information-and-services/finance-and-investment/taxation/excise-tax	United Arab Emirates

<p>The added sugars definition set out above (Q1) was put together using information and evidence from a range of sources including discussions with food industry and intelligence gained on sugars used in food and drink products; and detail included in the report on Carbohydrates and health from the UK Scientific Advisory Committee on Nutrition. There are no plans to undertake any verification of this definition. In the UK, the legal requirement is for the food business operator to ensure compliance with the legislated definition of sugars in the nutrition declaration (see the answer to Q2 above for this definition). If the requirement of the content of the declaration changed from its current definition, we would work with industry to help them understand the changes, and what they need to do to achieve and ensure continued compliance. Enforcement of the legislation is delegated to appropriate authorities in each of the four countries in the UK.</p>	<p>United Kingdom</p>
<p>Desde el punto de vista documental, es a través de la fórmula cuali cuantitativa al momento del registro del producto y lista de ingredientes del rotulado.</p>	<p>Uruguay</p>
<p>Because added sugars are calculated using information from the supply chain, production practices, and product formulation, verification in the United States is based on manufacturers' recordkeeping of the data needed for post-market inspection. The United States details the methodology used to determine added sugars in the following guidance document: https://www.fda.gov/media/117402/download.</p>	<p>USA</p>
<p>ALAIAB considera que antes de poder verificar su presencia, es necesario definir la intención y la definición de lo que se consideran "azúcares añadidos". Finalmente, la verificación es posible mediante el mantenimiento de registros. Por ejemplo, es posible que los fabricantes necesiten trabajar con sus proveedores para determinar la cantidad de mono y disacáridos libres en los ingredientes utilizados en la formulación de un alimento. Una vez que se determinan todas las fuentes de azúcares que cumplen con la definición de azúcares añadidos, se debe agregar o calcular la cantidad de esos azúcares de cada ingrediente en función de los pasos de procesamiento del alimento terminado (por ejemplo, como resultado de la dilución de un jugo o fermentación de fruta o verdura concentrada) para determinar la cantidad de azúcares añadidos en una porción del producto que contiene los ingredientes.</p>	<p>Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB)</p>
<p>No answer. See replies in Q1 & Q2</p>	<p>CEFS</p>
<p>At present, there is no intention within the EU to establish a regulatory definition for "added sugars." Also, to our best of knowledge, there's no accurate analytical method available that can distinguish natural sugar from added sugar in food and drinks.</p>	<p>ENSA</p>
<p>N/A</p>	<p>FIVS</p>
<p>None of the 12 countries (Brunei, Cambodia, China, India, Indonesia, Laos, Malaysia, Myanmar, Philippines, Singapore, Thailand and Vietnam) have a provision outlining the verification process for the declaration of added sugars.</p>	<p>Food Industry Asia</p>
<p>In the EU there is currently no plan of providing a regulatory definition of "added sugars".</p>	<p>FoodDrinkEurope</p>
<p>Before their presence can be verified, 'added sugars' must be defined (see answer to Q4). Then, manufacturers are in the best position to determine what method is most suitable for determining the added sugars declaration, given their knowledge of their supply chain, production practices and product formulations. Generally, calculating the total 'added sugars' begins with knowledge of 'added sugars' contributions from ingredients used to formulate a product (see below for further description as to what this entails).</p> <p>Finally, verification is possible with recordkeeping. For example, manufacturers may need to work with their suppliers to determine the amount of free mono- and disaccharides in ingredients used in a food's formulation. Once all sources of sugars that meet the definition of added sugars are determined, the amount of those sugars from each ingredient should be added or calculated based on processing steps for the finished food (e.g., as a result of dilution of a concentrated fruit or vegetable juice or fermentation) to determine the amount of added sugars in a serving of the product containing the ingredients.</p>	<p>ICBA</p>
<p>IDF would like to note the standardized methodology used to determine lactose content in general.- ISO 22662 IDF 198: 2007 - Milk and milk products - Determination of lactose content by high-performance liquid chromatography (Reference method) (Method is being revised). Scope:</p>	<p>IDF/FIL</p>

<p>This standard specifies the reference method for the determination of lactose content of raw milk, heat-treated milks, dried milk and raw and pasteurized cream. The method is not applicable to fermented milks and milks to which oligosaccharides have been added.- ISO 26462 IDF 214: 2010 - Milk - Determination of lactose content - Enzymatic method using difference in pH. Scope:This standard specifies an enzymatic method for the determination of the lactose content of milk and reconstituted milk by measurement of the difference in pH.- ISO 22184 IDF 244: 2021 - Milk and milk products - Determination of the sugar contents - High performance anion exchange chromatography with pulsed amperometric detection method (HPAEC-PAD). Scope: This standard specifies the quantitative liquid chromatographic determination of specific sugars (galactose, glucose, fructose, sucrose, lactose and maltose) in various milk and milk products, applying arabinose as an internal standard. The method is applicable to the following dairy matrices: milk, sweetened condensed milk, milk powder, cheese, whey powder, infant formula, milk dessert and yoghurt.- ISO 5765-1 IDF 79-1: 2002 - Dried milk, dried ice-mixes and processed cheese - Determination of lactose content - Part 1: Enzymatic method utilizing the glucose moiety of the lactose. Scope: This standard specifies an enzymatic method for the determination of the lactose content of all types of dried milk, of ice-mixes in dry form in the presence of other carbohydrates and reducing substances, and of processed cheese.- ISO 5765-2 IDF 79-2: 2002 - Dried milk, dried ice-mixes and processed cheese - Determination of lactose content - Part 2: Enzymatic method utilizing the galactose moiety of the lactose. Scope: This standard specifies an enzymatic method for the determination of the lactose content of all types of dried milk, of ice-mixes in dry form in the presence of other carbohydrates and reducing substances, and of processed cheese.</p>	
<p>It is the manufacturer responsibility to ensure accurate labelling.</p> <p>The US FDA guidance is:</p> <p>https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-guide-developing-and-using-data-bases-nutrition-labeling#label</p>	IFT
<p>In the ongoing process of defining added sugars, it is essential to recognize the inherent nature of certain products, for example, juices and milk, which inherently contain only natural sugars. Drawing a clear distinction between products with added sugar during production and those with inherent natural sugars is crucial. According to the CODEX General Standard for Fruit Juices and Nectars (CODEX STAN 247-2005), fruit juices retain essential characteristics of the fruit(s) from which they originate. A fruit juice is made from the whole fruit's edible parts and does not contain more sugar than the corresponding fruit.</p>	IFU
<p>No information on this at the moment. Unaware of any plans however a regional vote on FOPWL is underway and the 'high in' octagonal warning label as defined by the PAHO Nutrient Profile model is the chosen model of CARICOM. Should the vote be successful, defending, declaring and verifying added sugars will be important.</p>	The Healthy Caribbean Coalition
<p>The World Federation of Public Health Associations does not represent a specific jurisdiction. We suggest that methods similar to those acceptable for use in quantifying other existing food components in the nutrient declaration could be used for added sugar - including calculations supported by accepted databases and recipes where reliance on analytical testing is not possible.</p> <p>Methods for verifying added sugars through record keeping that have been applied in the United States demonstrate the feasibility of this approach in other markets.</p> <p>Researchers have also recently published updated methods for estimating added sugar in packaged products in a way that can be adapted for different definitions of added sugars. The method is incorporated into this paper by Coyle et al: https://dx.doi.org/10.1016/j.cdnut.2023.102058</p>	World Federation of Public Health Associations
<p>Methods similar to those acceptable for quantifying other food components in the nutrient declaration could be used for added sugars. The United States' methods for verifying added sugars through record keeping are a feasible way to do it and expand it to other countries.</p>	World Public Health Nutrition Association

Q4: Do you think it is important for Codex to define the term "added sugars"? Please explain. (YES / NO / OTHER)

<p>Sí, establecer una definición de los azúcares añadidos en el Códex es importante ya que permitirá establecer un criterio común, armonizar y unificar criterios en los distintos países. Actualmente, existen varios países que incluyen la definición azúcares añadidos/agregados en sus legislaciones locales</p>	<p>Argentina</p>
<p>YES.</p> <p>Brazil recognizes the importance of declaring added sugars as part of nutrition labelling to provide consumers with essential information for making informed food choices. In Brazil, this declaration is considered essential to ensure consumers' constitutional right to information about product characteristics as established in the Brazilian Consumer Protection Code and to assist consumers in adhering to the recommendations outlined in the Brazilian Dietary Guidelines. This declaration is substantiated by scientific evidence about the impact of added sugar intake on the increased risk of overweight, obesity, and certain non-communicable diseases. Additionally, some countries require the disclosure of added sugars in nutrition labelling and others are evaluating their declaration. Therefore, the adoption of a standardized definition by the Codex Alimentarius could contribute to reducing obstacles to international trade.</p>	<p>Brazil</p>
<p>Q4: OTHER - Canada does not require added sugars content to be declared and therefore does not have any comments to provide. However, if CCFL were to consider defining "added sugars", it would be important to clearly identify the purpose of the definition and the context where such a definition should and should not be applied.</p>	<p>Canada</p>
<p>P4:Respuesta:OTROChile considera, como se mencionó en la respuesta a la pregunta N°1, que no se visualiza el objetivo claro del trabajo propuesto, vale decir, es importante definir el término "azúcares añadidos" ¿para qué?, ¿Cuál sería el objetivo de incorporar esta definición? Creemos que esclareciendo estas dudas podremos evaluar de mejor forma si es importante tener una definición concreta del término (SI/NO), con su respectiva justificación.Desconociendo lo anterior, Chile consideraría importante definir el término azúcares añadidos, ya que podría favorecer la armonización regulatoria entre los países que sí utilizan este concepto. Un número cada vez mayor de directrices dietéticas nacionales recomiendan limitar la ingesta de azúcares añadidos en alimentos y bebidas, y cada vez se utiliza con más frecuencia en las declaraciones de nutrientes. Mencionar que el término "azúcares añadidos", ya que se encuentra establecido en nuestra regulación nacional vigente. Por lo que desconociendo el objetivo del trabajo, pensamos que esta definición, podría también llevar al uso de un descriptor que es menos relevante que otros descriptores, dado que, si se ocupa sólo, sin otras descripciones complementarias o explicativas, puede ser confundente para el consumidor sin preparación o conocimiento alimentario nutricional, asumiendo que el producto alimenticio que lleva la declaración "sin azúcar añadido" no contiene ningún tipo de azúcar, o bien, no contiene calorías.Por otro lado, el cuerpo humano no distingue entre azúcares naturales o añadidos a alimentos y bebidas, ya que todos son químicamente iguales. Una vez ingeridos, todos los hidratos de carbono digeribles se descomponen en los monosacáridos que los constituyen (por ejemplo, glucosa o fructosa), lo cuales son absorbidos por el organismo. El valor calórico tanto de los azúcares naturales como de los añadidos es de 4 kilocalorías por gramo. Por lo tanto, relevar el sentido u objetivo de dicha definición, nuevamente, debería estar más claro.</p>	<p>Chile</p>
<p>OTRO. Colombia ya cuenta con una definición en este tema, por lo que no considera la inclusión de conceptos diferentes, pero está abierta a la revisión del actual concepto.</p>	<p>Colombia</p>
<p>X SI</p> <p>Costa Rica considera que, el CODEX como organismo internacional de referencia en materia de normalización de alimentos; en cumplimiento con sus objetivos podría proporcionar una definición armonizada y consensuada a nivel global de azúcares añadidos, a fin de fomentar prácticas comerciales equitativas y promover la transparencia en la información del producto.</p> <p>En el mismo sentido, esta definición previene ambigüedades en las regulaciones ya que pocos países tienen una definición para este término, pero un número cada vez mayor de directrices dietéticas nacionales recomiendan limitar la ingesta de azúcares añadidos de los alimentos y bebidas, y se está utilizando con mayor frecuencia en las declaraciones de nutrientes y/o en el etiquetado nutricional frontal del envase. De este</p>	<p>Costa Rica</p>

modo, la definición permitiría a los países disponer de una definición que facilite la comprensión y el uso común del término, así como proporcionar información a los consumidores para ayudarles a tomar decisiones sobre su consumo de azúcar.	
P4. Es muy importante conocer el contenido de azúcar añadido en los alimentos para conocer la ingesta diaria de la misma y además poder hacer las regulaciones en los patrones alimentarios de las personas con ECNT	Cuba
YES. It is important to clearly define which sugars are included in the term “added sugars”. In particular it is necessary to clarify whether or not “added sugars” include sweeteners (isomalt, steviol glycosides, etc.) and food with naturally occurring sugars, e.g. honey and fruit juices.	Cyprus
Es necesario que como referente mundial en alimentos, el Codex determine una definición que pueda ser adoptada por los países, con fines de mejorar la información al consumidor sobre la verdadera naturaleza del alimento.	Ecuador
Yes, The added sugars are not shall be sucrose only. Added sugars may be lactose, maltose, alcoholic sugars,... .And may be from cane sugar, beet sugar, honey,	Egypt
No. The EU does not consider it a priority to start new Codex work on a definition of “added sugars”. 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 2022 , 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 vegetables , the introduction of a new nutrition labelling item that would differentiate between total sugars and added/free sugars is not justified.	European Union
Consideramos que es importante la armonización de una definición de azúcares añadidos tomando en cuenta que es un nutriente que muchas regulaciones incorporan en la información nutricional y que al no contar con una definición armonizada global es muy difícil su cumplimiento, Sin embargo, nos preocupa algunos aspectos alrededor de este término, considerando que entre azúcares totales y azúcares añadidos no hay una	Guatemala

diferencia metabólica, así también no hay una metodología establecida para su diferenciación en el producto, por lo cual se consulta cuáles son los objetivos que persigue el Codex para establecer una definición armonizada de azúcares añadidos.	
Yes. It is important the term is defined because it requires deliberations based on scientific evidence to achieve an internationally acceptable definition. This definition can assist in the development of harmonized requirements and ensure consistency to trade.	Guyana
Yes. The current challenge is that globally there is no universally agreed definition for 'added sugars'. This results in a situation where National Authorities may take different opinions depending upon their usage. To have a universal definition Codex is best placed to work on this and same can be used by Codex adopting countries. It is aligned with Codex's mandate to ensure consumers are provided with accurate information and not misled in any form of communication as well as to promote fair practices in food trade. Manufacturers use various ingredients and their contribution partly or fully to added sugars needs to be uniform for similar global application and Codex discussion on this would help manufacturers also for such harmonization.	India
YES Rationale: Indonesia believes that it is important for Codex to develop a comprehensive definition of added sugars. This definition should include both sugars added directly by producer and sugars that occur naturally in raw materials. A comprehensive definition is essential for developing the standardized testing method.	Indonesia
Yes. It is better for all countries to follow the law of adding the amount of sugars in the product. Therefore, the Food Codex should have a mandatory law in this matter.	Iran
YES It is right of consumer to know what sugars consumes in his diet and also to monitor the health effect of raised consumption of sugars	Iraq
Q4:NO As of now, we do not think it is important for Codex to define the term "added sugars", because labelling regarding "added sugars" is already stipulated in the Guidelines for Use of Nutrition and Health Claims (CGX 23-1997) for non-addition of sugars claims. In order to consider the declaration of "added sugars", it is presupposed to qualify the analysis method of "added sugars" for the basis of labelling as the method of the Guidelines on Nutrition Labelling in CCMAS' Recommended methods of analysis and sampling (CXS 234-1999), which we need to work out and discuss.	Japan
YES: It is important to have a Codex definition of added sugar to enable a common understanding of the term, especially regarding nutrition labelling and the use of supplementary nutrition information such as front-of-the-pack nutrition labelling that is gaining international interest, especially for the trade of goods. This will enable Codex actively to play its mandate as it relates to the facilitation of trade.	Kenya
Yes	Malaysia
OTHER New Zealand would like clarification on what is meant by the term "added sugar(s)" in this context. Globally there are many terms used to describe sugars which should be limited for health purposes. These include "added sugar(s)", "free sugar(s)" and "liberated sugar(s)". These terms are often used interchangeably, and various definitions exist for these terms internationally. It is our understanding that the terms and definitions for "free sugar(s)" and "liberated sugar(s)" are more specifically designed to describe those sugars that are recommended to be limited in the diet, rather	New Zealand

<p>than the literal definition of “added sugar(s)” (meaning sugars physically added to a base food and not including the intrinsic sugars present in the base food).</p> <p>It is important that before Codex commence any work on defining “added sugar(s)” there is a clear understanding of what the underlying purpose for this term is. For example, is this intended to capture just sugars that are physically added to food or is it intended to also capture sugar-based ingredients that may be recommended to be limited by dietary guidelines for health purposes. Depending on the desired purpose of the definition it may be appropriate for Codex to consider using a term other than “added sugar(s)”, given that consumers may interpret this to only be those sugars physically added to foods. It will also be important to determine what purpose(s) a definition of added sugar will be used for (e.g. nutrient declaration, claims etc) to ensure a definition meets the purpose(s).</p>	
<p>Es muy importante que el Codex defina el término " azúcares añadidos" entendiendo que esto podría ayudar a unificar o servir como directriz para los miembros que requieran.</p>	Paraguay
<p>Si. Comentarios: Consideramos que es importante tener una definición establecida en el Codex, pero se debe tomar en cuenta lo siguiente: (i) no existe ningún método analítico para distinguir los azúcares añadidos de los azúcares intrínsecos, lo que puede limitar el proceso de inspección. (ii) Según la base nutricional científica y la definición de nutrientes, tanto el azúcar intrínseco como el azúcar añadida aportan la misma cantidad de calorías (4 kcal/g); (iii) no hay diferencia metabólica en comparación con otros azúcares (respuesta fisiológica). La estructura de los azúcares, añadidos o no, es la misma y se metaboliza de la misma forma en el organismo.</p>	Peru
<p>Yes, it is crucial to establish a clear definition of the term "added sugars." This definition plays a pivotal role in promoting transparency in food labeling, impacting various aspects such as public health, regulatory considerations in food labeling, consumer concerns, industry compliance, research, and international trade and cooperation.</p> <p>The defined concept of added sugars is instrumental in enabling consumers to make well-informed dietary choices and supporting public health initiatives. Furthermore, it facilitates regulatory measures aimed at addressing excessive sugar intake. The establishment of a standardized definition not only ensures consistency across international markets but also aids both industry compliance and enhances consumer understanding of nutritional content.</p>	Philippines
<p>Yes, defining "added sugars" is essential for informing consumers about nutritional content, promoting health awareness, and facilitating regulatory control in food labeling. It also contributes to international trade consistency, and supports research and policy development for effective public health measures. Not to mention, there are challenges that arise due to the existence of multiple definitions from various organizations. As a result, it is essential to adopt a standardized definition, and we believe that the existing definition from the World Health Organization is both acceptable and comprehensive.</p>	Saudi Arabia
<p>Yes. This will aid public education and help consumers identify foods and beverages which are higher in added sugars, while differentiating those from the naturally occurring sugars found in whole fruits and vegetables. Generally, humans do not require any discretionary energy intake from added sugars and their intakes should be minimal as part of a nutritionally adequate diet. With the information on added sugar provided on the labels, consumers can better make informed and healthier dietary choices. This may also encourage the F&B industry to reformulate their food and beverage products. Finally, this will also help the standardisation of reporting guidelines and definitions for dietary sugars and their sources, as well as validate research & surveillance methods.</p>	Singapore
<p>Yes, South Africa is in support for Codex to define the terms “added sugars” as currently there is no internationally harmonised definition for added sugars</p>	South Africa
<p>Il est important que le Codex définisse le terme de "sucres ajoutés" car: i) ces ingrédients font l'objet de campagnes d'éducation du consommateur pour réduire la consommation en sucre; ii) il y a une confusion avec les sucres libres, les sucres naturellement présents dans les aliments et les sucres totaux.</p>	Tunisia

YES	United Arab Emirates
OTHER. We can see that a Codex definition for the term “added sugars” would be helpful to harmonise the term across member states. If not already done, we would suggest that Codex also consider a definition for “free sugars” as this is the most accurate and relevant when considering the impact of sugars on health outcomes.	United Kingdom
SI - Se considera importante que se defina el termino azucares añadidos, por varias razones: 1) para poder distinguirlo de los azúcares naturalmente presentes en los alimentos y poder armonizar las diferentes legislaciones 2) desde el punto de vista de la salud, distinguir la cantidad de azúcares añadidos facilita al mismo poder conocer la cantidad que esta presente en los alimentos y regular su consumo considerando que los azucares agregados equivalen a los azúcares libres definidos por la OMS. La OMS en la “Directriz: Ingesta de azúcares para adultos y niños” 2015, recomienda a toda la población reducir el consumo de azúcares libres a un 10% de la ingesta calórica total e idealmente a un 5%. En ese mismo documento se define azúcares libres como «Los azúcares libres incluyen los monosacáridos y los disacáridos añadidos a los alimentos y las bebidas por el fabricante, el cocinero o el consumidor, más los azúcares naturalmente presentes en la miel, los jarabes, los jugos de frutas y los concentrados de jugos de frutas».	Uruguay
Yes. The United States notes there has been an increase in the adoption of added sugars definitions to support national nutrient declarations and/or front-of-pack nutrition labeling requirements. We believe it is important for Codex to define the term added sugars to support harmonization and facilitate fairness in the food trade as countries increasingly look to update national regulations to include added sugars to align with dietary guidelines and encourage healthy diets.	USA
YES. ALAIAB considera que, el CODEX es el organismo internacional de referencia en materia de normalización de alimentos; por lo que, se considera oportuno que el Codex en cumplimiento a sus objetivos proporcione una definición armonizada y consensuada a nivel global de azúcares añadidos, a fin de fomentar prácticas comerciales equitativas y promover la transparencia en la información del producto. En el mismo sentido, esta definición previene ambigüedades en las regulaciones y permitiría proporcionar información a los consumidores para ayudarles a tomar decisiones sobre su consumo de azúcar. Adicionalmente, les permite a los países disponer de una definición que facilite el uso común del término.	Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB)
NO. There is no convincing scientific justification for distinguishing between the different types of sugars. Sugars, whether “added” to foods or “naturally occurring” in fruits or vegetables, deliver the same amount of calories (4 kcal/g) and are digested in the same way by the human body. The body does not distinguish between sugars used in manufactured food and drinks or in the home, and those found naturally in foods. Therefore, a definition or information on “added sugars” content would not provide consumers with any meaningful information as to the nutritional value or physiological influence of a food.	CEFS
Yes. It is important for Codex to define the term “added sugars”. The copious forms of mono and disaccharides, numerous types of syrups and concentrated fruits, other food concentrates and the addition of high sugar constituents such as jams, chocolate ingredients etc that are added to foods that function as sweetening agents all need to be identified as “added sugars” to distinguish them from sugars that are naturally found in foods that are otherwise nutritious.. Secondly consumers have a right to full and accurate information about the food products they may wish to purchase. Providing information about the quantity of “added sugars” is a fundamental requirement to make informed choice in the market place. Thirdly it is critically important label information to assist mothers, parents, families, children etc to understand and manage their “sugar” intake as a health protection measure. Labelling with full quantitative information of all the various forms of “added sugars”, both as a percentage of added sugar by weight in the ingredient list and as a sub-total of total sugars in the nutrient declaration panel is needed to enable consumers to realize national and WHO recommendations on daily total added and free sugar consumption limits. The World Health Organization recommends that the	ENCA

<p>intake of free sugars (defined as monosaccharides and disaccharides added to foods, plus sugars that are naturally present in honey, syrups, and fruit juices) be less than 10% of total energy intake, and a further reduction to less than 5% of total energy intake would provide additional health benefits.¹</p> <p>The consumption of processed foods containing significant amounts of added sugars replaces healthy foods such as whole grains and fruits and vegetables. Afshin et al (2019)² reported that the health impact of sub-optimal diets in 195 countries “accounted for more than 50% of deaths and 66% of DALYs attributable to diet. Our findings show that suboptimal diet is responsible for more deaths than any other risks globally, including tobacco smoking”.</p>	
<p>NO. ENSA believes that Codex should refrain from defining "added sugar" as it holds a crucial role in ensuring accurate and transparent labelling. A definition of added sugar could be confusing and misleading for consumers because, despite recognising concerns about high carbohydrate intake in some populations, current evidence doesn't differentiate the health impact between naturally occurring- and added sugars. This is highlighted by the European Food Safety Authority. (EFSA Panel on Nutrition, Novel Foods, and Food Allergens, 2022. Scientific Opinion on the tolerable upper intake level for dietary sugars. EFSA Journal 2022;20(2):7074, 337 pp. https://doi.org/10.2903/j.efsa.2022.7074). Thus, from a physiological standpoint, the body processes all sugars, whether natural or added, in the same way. The caloric value and the consumer-relevant nutritional information is and remains total sugars. Moreover, the World Health Organization (WHO) mentioned in 2015 (WHO Guidance on sugars intake for adults and children) that the main health issues related to sugar are tooth decay and obesity, but there is not enough evidence to link specific types of sugars such as added-, naturally occurring-, free-, or total sugar to tooth decay. Additionally, obesity, according to WHO, is associated with overall energy intake rather than any particular type of dietary sugars. Hence, the lack of clarity on the health effects calls for caution in defining and differentiating sugars for regulatory purposes.</p>	ENSA
<p>YES: FIVS believes that a definition for added sugars may be useful in instances where sugar levels are above what would be typically expected in a product.</p>	FIVS
<p>FIA view that it is important to have a clear definition of “added” sugars. It is aligned with the Codex’s mandate to ensure consumers are provided with accurate information and not misled in any form of communication as well as to promote fair practices in food trade. The current challenge is that globally there is no universally agreed definition for “added sugars”, resulting in competent authorities taking different opinion and some products being unnecessarily penalised due to intrinsic sugar levels in the products. Hence, it is important to define a definition in Codex so that a harmonised “added sugars” definition can be used for nutrient declaration, as well as for health policies such as front-of-pack nutrition labelling and nutrient profiles.</p> <p>We also recognise that the WHO has already done much work in the area of defining free sugars, including the 2015 Guideline: sugar intake for adults and children [https://iris.who.int/bitstream/handle/10665/149782/9789241549028_eng.pdf?sequence=1], which may be relevant to this work.</p>	Food Industry Asia
<p>NO. We acknowledge that in some parts of the population the intake of carbohydrates is too high compared to other nutrients and considering lifestyle and physical activity levels. Nevertheless, current evidence does not indicate a difference in the health impact between naturally occurring sugars and added sugars (European Food Safety Authority, 2022. Scientific Opinion on the tolerable upper intake level for dietary sugars. EFSA Journal 2022;20(2):7074, 337 pp. https://doi.org/10.2903/j.efsa.2022.7074ISSN:1831-4732). The human body does not distinguish between sugars that occur naturally or are added to foods and beverages, as they are all chemically the same. Once ingested, all digestible carbohydrates are broken down into their constituting monosaccharides (e.g. glucose or fructose), which are then absorbed by the body. Caloric value of both sugars occurring naturally and added is 4 Kilocalories per gram. Thus, the pertinent nutritional information from the consumer’s perspective would be total sugars. Moreover, there is insufficient clarity on the causative effect of sugar intake on health of humans. WHO Guidance on sugars intake for adults and children from 2015 indicates tooth decay and obesity as main health effects. Regarding tooth decay, there is no proper evidence yet on whether it is caused by 'added sugars,' 'free sugars,' or 'total sugars,' either individually or in combination with other food attributes. The WHO Guideline Sugar intake for adults and children indicates that free sugars are linked to dental caries, but there is no link mentioned between added sugars and dental caries; suggesting that most studies have not made a clear distinction between the two. Additionally, The European Food Safety</p>	FoodDrinkEurope

<p>Authority's Scientific Opinion on the tolerable upper intake level for dietary sugars concluded that, while the intake of dietary sugars is a well-established hazard in relation to dental caries in humans, 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 (European Food Safety Authority, 2022. Scientific Opinion on the tolerable upper intake level for dietary sugars. EFSA Journal 2022;20(2):7074, p.1. https://doi.org/10.2903/j.efsa.2022.7074ISSN:1831-4732).On obesity, the WHO guidance is clear that it is linked to energy intake, which, in turn, is associated with overall carbohydrate content and not specifically to any type of dietary sugars.</p>	
<p>YES.</p> <p>ICBA supports defining the term 'added sugars' as this supports global harmonization. Very few countries have a definition for this term, but an increasing number of national dietary guidelines recommend limiting intake of added sugars from foods and beverages, and it is becoming used more often in nutrient declarations and/or front-of-pack nutrition labelling. We believe having a Codex definition would help facilitate common understanding and usage of the term.</p>	<p>ICBA</p>
<p>OTHER. While IDF maintains a neutral position on this question, we strongly recommend excluding lactose -naturally present in dairy products- from being named as an 'added sugar', if Codex chooses to define the term.</p>	<p>IDF/FIL</p>
<p>While there is no scientific consensus definition of added sugar, there are currently a wide range of definitions across the globe. Establishing a definition within the Codex Alimentarius would help ensure consistency for trade and help ensure consumer choice.</p>	<p>IFT</p>
<p>YES.</p> <p>It is important for Codex to define the term "added sugars." We believe there are significant potential consumer information and public health benefits from identifying added sugars as part of quantitative nutrition or ingredient labelling if that is provided on a mandatory basis, provided that the definition of added sugars is clear, comprehensive, and provides relevant information to the consumer about the sugars they should be limiting in their diets. Within the broader category of sugars, there is a key distinction between naturally occurring sugars found in foods and beverages like fruit, vegetables, and dairy products (i.e., intact sugars); and sugars added to foods and beverages during manufacturing, processing, and preparation or sugars that remain after nutritious components of food are removed (such as in juices made from fruit). Consumption of naturally occurring sugars found in whole minimally processed foods is generally not associated with negative health effects (1), as the amount of naturally occurring sugars in foods and beverages tends to be modest, and these foods and beverages are often rich in fiber and other beneficial nutrients. However, overconsumption of foods and beverages high in non-naturally occurring sugars (especially sugar-sweetened beverages) has been linked to increased risk of type 2 diabetes (2,3,4) and cardiovascular disease (5,6,7), in part by increasing the risk of weight gain (8). This overconsumption can also contribute to dental decay (9). Therefore, reducing consumption of foods and beverages high in non-naturally occurring sugars is an essential public health measure to reduce chronic disease risk. To implement policies and regulations promoting the reduction of sugars added to the food supply, we must first agree on a definition for these "added sugars." In this comment, when we use the term "added sugars," we are referring to the World Health Organization's (WHO's) definition of "added sugars": "sugars that are added to food during food processing, sugars used as sweeteners, and sugars from honey and concentrated fruit or vegetable juices. Added sugars do not include naturally occurring sugars, such as sugars in the intact cell walls of fruit and vegetables, or sugars present in [unsweetened] milk" (10). A suitable definition for "added sugars" might include substituting the more inclusive term "free sugars" used by the WHO or nominating alternative terms with the same meaning. Too narrow a definition of added sugars will limit consumers' understanding of sugar in products and could perpetuate a 'health halo' unjustifiably implying benefits of many ingredients and foods that they do not possess. It is therefore critical to include processed fruit ingredients like fruit juices, fruit juice concentrates, pastes, and purees in the definition. Codex should look to the more inclusive definition of "free sugars," a term that WHO—a parent organization of Codex—uses for nutrition recommendations instead of "added sugars." WHO defines "free sugars" as "monosaccharides and disaccharides added to foods and beverages by the manufacturer, cook, or consumer; and sugars naturally present in honey, syrups, fruit juices and fruit juice concentrate" (11). In 2015, WHO published guidelines recommending that adults and children reduce their daily intake of free sugars to less than 10% of their total energy intake, and that a further reduction to below 5% or roughly 25 grams (6 teaspoons)</p>	<p>International Association of Consumer Food Organizations</p>

<p>per day would provide additional health benefits (12). Codex could consider defining both added sugars and free sugars, and ideally focus on the free sugars definition because it aligns with WHO guidelines on sugar intake. By promoting international harmonization, Codex can help save the considerable resources required for governments to individually develop their own definitions and can contribute to a 'level playing field' for industry between markets as well as facilitating the work of a robust, independent, and transparent monitoring system of the food supply. This could also help correct misleading product labelling and advertising and protect health, two fundamental aims of Codex. A definition of added sugars and its disclosure on labelling and advertising will also ensure that consumers understand whether the products they are purchasing contain only sugars naturally present in nutritious whole foods or have, essentially, been fortified with sugar. Providing consumers with information about the added sugars content of their foods and beverages could thus help reduce confusion and encourage healthier choices. For more information, see our comments in response to Question 6. References</p> <ol style="list-style-type: none"> 1. Lee AK, Chowdhury R, Welsh JA. Sugars and adiposity: the long-term effects of consuming added and naturally occurring sugars in foods and in beverages. <i>Obes Sci Pract.</i> 2015 Oct;1(1):41-9. 2. Drouin-Chartier JP, Zheng Y, Li Y, Malik V, Pan A, Bhupathiraju SN, Tobias DK, Manson JE, Willett WC, Hu FB. Changes in consumption of sugary beverages and artificially sweetened beverages and subsequent risk of type 2 diabetes: Results from three large prospective U.S. cohorts of women and men. <i>Diabetes Care.</i> 2019;42(12):2181-2189. 3. Imamura F, O'Connor L, Ye Z, Mursu J, Hayashino Y, Bhupathiraju SN, Forouhi NG. Consumption of sugar sweetened beverages, artificially sweetened beverages, and fruit juice and incidence of type 2 diabetes: Systematic review, meta-analysis, and estimation of population attributable fraction. <i>BMJ.</i> 2015;351:h3576. 4. Neuenschwander M, Ballon A, Weber KS, Norat T, Aune D, Schwingshackl L, Schlesinger S. Role of diet in type 2 diabetes incidence: Umbrella review of meta-analyses of prospective observational studies. <i>BMJ.</i> 2019;365:12368. 5. Narain A, Kwok CS, Mamas MA. Soft drinks and sweetened beverages and the risk of cardiovascular disease and mortality: A systematic review and meta-analysis. <i>Int J Clin Pract.</i> 2016;70(10):791-805. 6. Bergwall S, Johansson A, Sonestedt E, Acosta S. High versus low-added sugar consumption for the primary prevention of cardiovascular disease. <i>Cochrane Database Syst Rev.</i> 2022;1(1):CD013320. 7. Yang Q, Zhang Z, Gregg EW, Flanders WD, Merritt R, Hu FB. Added sugar intake and cardiovascular diseases mortality among U.S. adults. <i>JAMA Intern Med.</i> 2014;174(4):516. 8. Nguyen M, Jarvis SE, Tinajero MG, Yu J, Chiavaroli L, Mejia SB, Khan TA, Tobias DK, Willett WC, Hu FB, Hanley AJ. Sugar-sweetened beverage consumption and weight gain in children and adults: A systematic review and meta-analysis of prospective cohort studies and randomized controlled trials. <i>Am J Clin Nutr.</i> 2023;117(1):160-174. 9. Valenzuela MJ, Waterhouse B, Aggarwal VR, Bloor K, Doran T. Effect of sugar-sweetened beverages on oral health: A systematic review and meta-analysis. <i>Eur J Public Health.</i> 2020;31(1):122-129. 10. World Health Organization Regional Office for Europe. Sugars Factsheet. June 2022. https://cdn.who.int/media/docs/librariesprovider2/euro-health-topics/obesity/sugars-factsheet.pdf. Accessed January 19, 2024. 11. World Health Organization Regional Office for Europe. Sugars Factsheet. June 2022. https://cdn.who.int/media/docs/librariesprovider2/euro-health-topics/obesity/sugars-factsheet.pdf. Accessed January 19, 2024. 12. Guideline: Sugars intake for adults and children. Geneva: World Health Organization; 2015. 	
<p>Yes.</p> <p>It is important for Codex to define the term "added sugars". The copious forms of mono and disaccharides, numerous types of syrups and concentrated fruits, other food concentrates and the addition of high sugar constituents such as jams, chocolate ingredients etc that are added to foods that function as sweetening agents all need to be identified as "added sugars" to distinguish them from sugars that are naturally found in foods that are otherwise nutritious. Secondly consumers have a right to full and accurate information about the food products they may wish to purchase. Providing information about the quantity of "added sugars" is a fundamental requirement to make informed choice in the market place. Thirdly it is critically important label information to assist mothers, parents, families, children etc to understand and manage their "sugar" intake as a health protection measure. Labelling with full quantitative information of all the various forms of "added sugars", both as a percentage of added sugar by weight in the ingredient list and as a sub-total of total sugars in the nutrient declaration panel is needed to enable consumers to realize national and WHO recommendations on daily total added and free sugar consumption limits. The World Health Organization recommends that the intake of free sugars (defined as monosaccharides and disaccharides added to foods, plus sugars that are naturally present in honey, syrups, and fruit juices) be less than 10% of total energy intake, and a further reduction to less than 5% of total energy intake would provide additional health benefits. The consumption of processed foods containing significant amounts of added sugars replaces healthy foods such as whole grains and fruits and vegetables. Afshin et al (2019)² reported that the health impact of sub-optimal diets in 195 countries "accounted for more than 50% of</p>	<p>International Baby Food Action Network</p>

<p>deaths and 66% of DALYs attributable to diet. Our findings show that suboptimal diet is responsible for more deaths than any other risks globally, including tobacco smoking”.</p>	
<p>Before defining added sugars and develop a definition, ISDI is of the opinion that it is imperative for Codex to provide more context on the need and purpose of a definition and in full respect of its mandate.</p> <p>It is aligned with Codex’s mandate to ensure consumers are provided with accurate information and not misled in any form of communication as well as to promote fair practices in food trade.</p> <p>The current challenge is that globally there is no universally agreed definition for ‘added sugars’. This results in a situation where National Authorities may take different opinions and some products are unnecessarily penalized due to intrinsic sugars levels in the products.</p>	<p>International Special Dietary Food Industries</p>
<p>YES.</p> <p>The Caribbean has some of the highest rates of adult and childhood overweight and obesity and NCDs in the world and some of the highest levels of consumption of sugar sweetened beverages. Overconsumption of sugar largely driven by sugars added to the food supply is associated with increased risk of obesity and diet-related NCDs.</p> <p>Countries such as those in the Caribbean, with limited technical resources, will look to CODEX for assistance in defining this term especially as they seek accelerate the formulation, implementation and enforcement of healthy food policies such as front of package warning labelling. There are significant benefits from Codex conducting work in this area to promote international harmonization.</p> <p>There are significant potential consumer information and public health benefits from identifying added sugars as part of nutrition labelling, provided that the definition of added sugar is comprehensive (and considers all added sugars including sugars derived from fruit and vegetables concentrates (syrops and powder). A narrow definition of added sugars could perpetuate the health halo that surrounds many ingredients if they were not to be captured in the definition, particularly processed fruit ingredients like fruit juices, pastes and purees.</p>	<p>The Healthy Caribbean Coalition</p>
<p>YES.</p> <p>The World Federation of Public Health Associations believes it is important for Codex to define the term added sugars.</p> <p>WFPHA believe there are significant potential consumer information and public health benefits from identifying added sugars as part of nutrition labelling, provided that the definition of added sugar is comprehensive and provides relevant information to the consumer about the sugars they should be limiting in their diets, distinct from total sugars. It is added or free sugars that are the focus of recommendations in many national dietary guidelines – yet consumers don’t currently have access to this information on pack in most jurisdictions to use the label to avoid them.</p> <p>We do exercise caution that if Codex were to adopt a narrow definition of added sugar, this will limit value added to consumers’ understanding of sugar in products and could perpetuate the health halo that surrounds many ingredients if they were not to be included in the definition, particularly processed fruit ingredients like fruit juices, pastes and purees.</p> <p>However, given the considerable resources required for governments to individually develop their own definitions and the benefits of a ‘level playing field’ for industry between markets and to facilitate trade, WFPHA believe there are significant benefits from Codex conducting work in this area to promote international harmonization.</p>	<p>World Federation of Public Health Associations</p>
<p>WPHNA considers it vital that Codex defines the term “added sugars.” There are significant potential consumer information and public health benefits from identifying added sugars as part of nutrition labelling, provided that the definition of added sugars is clear, comprehensive, and provides relevant information to the consumer about the sugars they should be limiting in their diets.</p> <p>As said before, there is a key distinction between naturally occurring sugars found in foods and beverages like fruit, vegetables, and dairy products and sugars added to foods and beverages during manufacturing, processing, and preparation. Consumption of naturally occurring sugars is</p>	<p>World Public Health Nutrition Association</p>

<p>generally not associated with negative health effects unless consumed in high concentrations, such as in recent research which showed that high intake of fruit juice is associated with obesity in children. However, overconsumption of foods and beverages high in non-naturally occurring sugars (e.g., sugar-sweetened beverages- including non-diet carbonated soft drinks, ready-to-drink sweetened teas and coffees, energy drinks, sports drinks, flavoured bottled water, and ‘fruit drinks’ with less than 100% fruit juice) has been linked to increased risk of type 2 diabetes,, and cardiovascular disease,,, in part by increasing the risk of weight gain. This overconsumption can also contribute to dental decay. Therefore, reducing consumption of foods and beverages high in non-naturally occurring sugars is an essential public health measure to reduce chronic disease risk.</p> <p>To implement policies and regulations promoting the reduction of sugars added to the food supply, we must first agree on a definition for these “added sugars.” In this comment, when we use the term “added sugars,” we are referring to the World Health Organization’s (WHO’s) definition: “sugars that are added to food during food processing, sugars used as sweeteners, and sugars from honey and concentrated fruit or vegetable juices. Added sugars do not include naturally occurring sugars, such as sugars in the intact cell walls of fruit and vegetables, or sugars present in milk.”</p> <p>A definition of added sugars will ensure that consumers understand whether the products they are purchasing contain only sugars naturally present in the food, or additional sugars that have been externally added.</p> <p>It is critical to include processed fruit ingredients like fruit juices, pastes, and purees in the definition. Codex should look to the more inclusive definition of “free sugars,” a term that WHO—a parent organization of Codex—uses for nutrition recommendations instead of “added sugars.” WHO defines “free sugars” as “monosaccharides and disaccharides added to foods and beverages by the manufacturer, cook, or consumer; and sugars naturally present in honey, syrups, fruit juices and fruit juice concentrate.” In 2015, WHO published guidelines recommending that adults and children reduce their daily intake of free sugars to less than 10% of their total energy intake, and that a further reduction to below 5% or roughly 25 grams (6 teaspoons) per day would provide additional health benefits.</p>	
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Q5: If your answer to question 4 is YES, which committee do you think, under its mandate, should develop such a definition? Please explain.

(Codex Committee on Food Labelling (CCFL) / Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) / OTHER)

<p>Se considera que la definición de “azúcares añadidos” debería ser trabajada en ambos comités ya que son importantes para alcanzar un consenso mundial en asuntos de nutrición.</p> <p>Bajo sus mandatos el Comité del Codex sobre Nutrición y Alimentos para Regímenes Especiales (CCNFSDU) se ocupa de una gran variedad de cuestiones técnicas y reglamentarias relativas a aspectos nutricionales de los alimentos, que pueden ayudar a prevenir deficiencias nutricionales y enfermedades no transmisibles relacionadas con la alimentación, y por su parte el Comité del Codex sobre Etiquetado de los Alimentos (CCFL) establece normas y directrices sobre la información que debe incluirse en los envases de los alimentos, incluyendo la información nutricional.</p>	Argentina
<p>Codex Committee on Food Labelling (CCFL)</p> <p>If a definition of added sugars is developed, we believe it should be included in the Guidelines on Nutrition Labelling, and both the CCFL and the CCNFSDU should collaborate in crafting this definition, as has been done for other nutrient definitions. It may also be relevant to raise the issue of specific analytical methods for added sugars with the CCMAS.</p>	Brazil
<p>Q5: N/A</p>	Canada
<p>P5:Respuesta:OTRO Chile considera que la información disponible es incompleta. La respuesta que proporcionemos dependerá de los objetivos que se busquen con esta definición. Es crucial que se planteen claramente los fines que se persiguen con esta definición.Dicho lo anterior, Chile</p>	Chile

considera, sólo en una primera instancia y entendiendo que falta información, que dado el mandato de los dos comités, se considera que los azúcares añadidos; deberían ser definidos por el CCNFSDU y cualquier propuesta de etiquetado debería ser abordada por el CCFL. Por otro lado, para temas de definición de método analítico estos deberían ser abordados por el CCMAS.	
<p>Codex Committee on Food Labelling (CCFL)</p> <p>Es necesario definir la intención y la definición de lo que dicha norma considera "azúcares añadidos", para lo cual es necesario tener claridad sobre los objetivos y alcances de contar con una definición de "azúcares añadidos". Ello puede arrojar más luces sobre los foros del Codex Alimentarius en los que se debe discutir el asunto.</p> <p>Habiendo dicho lo anterior, consideramos que la responsabilidad primaria de la discusión debe ser del CCFL para desarrollar la definición, aunque se recomienda que el CCFL consulte con el CCNFSDU y el CCMAS. De todas formas, cualquier definición deberá estar basada en ciencia.</p>	Colombia
<p>Costa Rica considera que la definición de azúcares añadidos puede ser desarrollada por el Comité del Codex sobre Nutrición y Alimentos para Regímenes Especiales y/o el Comité sobre Etiquetado de los Alimentos.</p> <p>Lo anterior, dado que los azúcares añadidos en los alimentos impactan directamente la salud y la nutrición de las personas. En concordancia con el mandato del CCNFSDU, le corresponde redactar disposiciones generales, según convenga, acerca de los aspectos nutricionales de todos los alimentos.</p> <p>No obstante, el CCFL en el ámbito de su mandato también podría desarrollar la definición como parte de velar por el establecimiento oportuno de los requisitos de etiquetado en aras de evitar declaraciones de propiedades y descripciones que puedan inducir a engaño o error al consumidor en el momento de su compra; y una vez desarrollada la definición, solicitar el respectivo aval al CCNFSDU.</p>	Costa Rica
P5.CCNFSDU	Cuba
Codex Committee on Food Labelling (CCFL)	Cyprus
Comité del Codex sobre Etiquetado de los Alimentos (CCFL)	Ecuador
Egypt proposes the declaration of "added sugars" verified with the nutrition facts on prepackaged foods for Special Dietary Uses. So, the Codex Committee on Nutrition and Foods for Special Dietary Uses "CCNFSDU" will be appropriate to mandate and develop such a definition.	Egypt
Not applicable	European Union
Tomando en cuenta que deseamos conocer cuáles son los objetivos que persigue el Codex para el establecimiento de una definición de azúcares añadidos y en espera de la discusión si se llega a considerar seguir con esta temática. Nuestra propuesta de abordaje es que el CCNFSDU debería definir los "azúcares añadidos" y cualquier propuesta de etiquetado debería ser competencia del CCFL.	Guatemala
It should be developed under the mandate of the Codex Committee on Food Labelling.	Guyana
Added sugars' definition can come from CCNFSDU as it needs to be framed taking into account their nutritional aspect as well as food/ingredient compositions and their contributions to added sugars vis a vis free and total sugars. Labelling proposals should fall within the remit of CCFL.	India
<p>Codex Committee on Food Labelling (CCFL)</p> <p>Rationale: Indonesia considers that the discussion on added sugars needs to be discussed under the Codex Committee on Food Labelling (CCFL) because it is related with nutrient declaration.</p>	Indonesia

<p>CCFL.</p> <p>If the goal is to mention the amount of added sugar on the label, it is better for the labeling committee to do it.</p>	<p>Iran</p>
<p>Codex Committee on Food Labelling (CCFL)</p>	<p>Iraq</p>
<p>CCNFSDU is best suited to provide the definition given that ultimately the intend of the definition will be in relation to NCDs. However, CCFL should originate the request giving clear guidance to CCNFSDU including guidance on its intended use and the Codex document in which the definition will be domiciled.</p>	<p>Kenya</p>
<p>Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU)</p>	<p>Malaysia</p>
<p>Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU)</p> <p>Added sugars are a nutritional aspect of food. Should CCFL decide that a definition of added sugars is needed for labelling purposes then New Zealand considers the Codex Committee on Nutrition and Foods for Special Dietary Uses would be the most appropriate Committee to develop this definition. Nutrition expertise is important given the number of technical challenges and barriers with developing an “added sugar(s)” definition. We have included more information on these challenges and barriers in our response to Question 7.</p> <p>It will be important for CCFL to be clear what purpose(s) a definition of added sugar will be used for to ensure any definition developed meets the purpose.</p>	<p>New Zealand</p>
<p>Si bien es un tema del área de Nutrición, entendemos que el CCFL podría desarrollar el punto de definir a los azúcares añadidos, ya que el CCFL se encuentra trabajando en varios temas que serían transversales a este.</p>	<p>Paraguay</p>
<p>Comité del Codex sobre Etiquetado de los alimentos (CCFL) Comentario: En línea con el desarrollo de definiciones de otros nutrientes, tales como ácidos grasos trans, grasas saturadas, etc. consideramos que el CCFL debe mantener la responsabilidad de establecer la definición de azúcares añadidos.</p>	<p>Peru</p>
<p>Codex Committee on Food Labelling (CCFL)</p> <p>The development of the added sugar definition should involve collaborative efforts between the Codex Committee on Food Labeling (CCFL) and the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU). Drawing upon the expertise and references of both committees ensures a comprehensive and balanced approach, integrating considerations related to food labeling and nutritional content. The committee may also need to refer this to CCMAS for additional inputs.</p> <p>However, it is recommended that the primary responsibility for formulating this definition lies with the CCFL, given its specialization in food labeling matters. This approach maintains clarity and efficiency in the development process while capitalizing on the CCFL's specific focus on the intricacies of food labeling standards.</p> <p>For everyone’s reference these are the TOR for CCNFSDU and CCFL</p> <p>CCFL TOR</p> <p>(a) to draft provisions on labelling applicable to all foods;</p> <p>(b) to consider, amend if necessary, and endorse draft specific provisions on labelling prepared by the Codex Committees drafting standards, codes of practice and guidelines;</p> <p>(c) to study specific labelling problems assigned to it by the Commission; and,</p> <p>(d) to study problems associated with the advertisement of food with particular reference to claims and misleading descriptions.</p> <p>CCNFSDU TOR</p> <p>(a) to study specific nutritional problems assigned to it by the Commission and advise the Commission on general nutrition issues;</p>	<p>Philippines</p>

<p>(b) to draft general provisions, as appropriate, concerning the nutritional aspects of all foods; (c) to develop standards, guidelines or related texts for foods for special dietary uses, in cooperation with other committees where necessary; and, (d) to consider, amend if necessary, and endorse provisions on nutritional aspects proposed for inclusion Codex standards, guidelines and related texts.</p>	
<p>Codex Committee on Food Labelling (CCFL) The Codex Committee on Food Labelling (CCFL) should develop a standardized definition of added sugars because added sugar will be declared in the nutrition fact, which lies under CCFL's scope of work.</p>	Saudi Arabia
<p>Codex Committee on Food Labelling (CCFL) As this is a labelling matter, CCFL should develop such a definition. CCFL has previously developed the definition of "Sugars" under the Guidelines on Nutrition Labelling (CXG-2-1985).</p>	Singapore
<ul style="list-style-type: none"> • It is our opinion that the Codex Committee in Food Labelling is the appropriate committee to develop a definition for added sugars since the proposal is to establish a definition for added sugars to be incorporated into the Guidelines on Nutritional Labelling (CXG 2-1985), as well as considering the inclusion of a declaration of added sugars in Section 3.2 on Listing of nutrients and these Guidelines fall under the mandate of the Codex Committee on Food Labelling. • However, the Codex Committee on Nutrition and Foods for Special Dietary Uses can be consulted if further guidance is required as its purpose amongst others are: <ul style="list-style-type: none"> <input type="checkbox"/> "To draft general provisions, as appropriate, concerning the nutritional aspects of all foods"; <input type="checkbox"/> "To develop standards, guidelines or related texts for foods for special dietary uses, in cooperation with other committees where necessary"; and, <input type="checkbox"/> "To consider, amend if necessary, and endorse provisions on nutritional aspects proposed for inclusion in Codex standards, guidelines and related texts." 	South Africa
<p>La contribution des deux comités CCNFSDU et CCFL, car :* Les spécialistes en nutrition et diététique doivent être consultés car au final, l'objectif d'une définition harmonisée sera utilisée dans la campagne de sensibilisation sur la surconsommation des sucres qui est néfaste pour la santé.* La norme codex de l'étiquetage est une norme horizontale pour tous types de produit.</p>	Tunisia
<p>CCFL</p>	United Arab Emirates
<p>OTHER. The Codex Committee on Food labelling should develop such a definition but it would be important for the CCNFSDU to be consulted and their views considered during the development of the definition.</p>	United Kingdom
<p>CCNFSDU - Considerando que define un parámetro relevante para la nutrición entendemos que correspondería al El Comité de Nutrición sería el adecuado por su expertise para definir el alcance de "azúcar agregado".</p>	Uruguay
<p>Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU). A definition for added sugars should be developed by CCNFSDU. The United States believes that this is suitably covered by CCNFSDU's term of reference "(b) to draft general provisions, as appropriate, concerning the nutritional aspects of all foods." CCNFSDU could then refer the definition to CCFL to draft labeling provisions related to added sugars as appropriate.</p>	USA
<p>Q5. CCNFSDU ALAIAB considera que la definición de azúcares añadidos puede ser desarrollada por el Comité de expertos del Comité del Codex sobre Nutrición y Alimentos para Regímenes Especiales, para contar con el sustento científico necesario y las orientaciones de etiquetado deberían ser competencia del Comité sobre Etiquetado de los Alimentos.No obstante, el CCFL en el ámbito de su mandato también</p>	Alianza Latinoamericana de Asociaciones de la

podría desarrollar la definición como parte de velar por el establecimiento oportuno de los requisitos de etiquetado en aras de evitar declaraciones de propiedades y descripciones que puedan inducir a engaño o error al consumidor en el momento de su compra; y una vez desarrollada la definición, solicitar el respectivo aval al CCNFSDU.	Industria de Alimentos y Bebidas (ALAIAB)
The the Codex Committee on Food Labelling (CCFL) to develop the definition and to endorse the mandatory quantitative nutrient and qualitative ingredient declaration labelling	ENCA
CODEX COMMITTEE ON FOOD LABELLING (CCFL): FIVS believes that CCFL is best equipped to tackle this issue given its mandate to draft provisions on labelling applicable to all foods.	FIVS
Given the work relates directly to information to be provided on labels, we consider that CCFL will be best placed to undertake this work. If needed, inputs from other Codex committees, such as CCNFSDU, can be sought from.	Food Industry Asia
X Codex Committee on Food Labelling (CCFL) X Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) “Added sugars” should be defined by CCNFSDU and any labeling proposal should fall within the remit of CCFL.	ICBA
Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) If Codex decides to start working on this topic, IDF considers that it should be under the mandate of CCNFSDU which is the committee having the best competence to assess the relevant nutritional and health-related aspects.	IDF/FIL
CCFL It may be prudent to refer the definition to CCNFSDU for nutritional advice. Such referral should not be deemed necessary to CCFL progress or be allowed to delay progress to the subsequent steps of the procedure within CCFL.	IFT
We seek the advice of the Codex Secretariat and WHO to determine which Committee is best placed to develop a definition, perhaps with reference to how definitions for similar food components have been developed historically. We note the potential for commercial conflicts of interest between the manufacturers and sellers of packaged products that are high in added sugars and policymaking in this area, and suggest the development of any definition be made with sufficient safeguards to ensure the development of a comprehensive definition that includes all sugars that are consumed alone or in foods that are harmful to health. While we respect the advice of the Codex Secretariat and WHO, our instinct is that the Codex Committee on Food Labelling (CCFL) should develop this definition, because added sugars should be labeled on all foods, not just foods for special dietary uses (see response to Question 6).	International Association of Consumer Food Organizations
The Codex Committee on Nutrition and Foods for Dietary Uses (CCNFSDU) is the appropriate place to develop the definition for “added sugars and the Codex Committee on Food Labelling (CCFL) to endorse the mandatory quantitative nutrient and qualitative ingredient declaration labelling. CLICK HERE TO ADD COMMENTS TO THIS QUESTION	International Baby Food Action Network
The Codex Committee on Nutrition and Foods for Dietary Uses (CCNFSDU) is the appropriate place to develop the definition for “added sugars and the Codex Committee on Food Labelling (CCFL) to endorse the mandatory quantitative nutrient and qualitative ingredient declaration labelling.	International Baby Food Action Network
ISDI notes the proposal is being raised within CCFL. The purpose of the work should be clarified and would determine the competent committee. If CCFL is considered as competent to lead such work, input from CCNFSDU and CCMAS will be required.	International Special Dietary Food Industries

<p>We are unsure as to which committee should develop this definition but we note that The Codex Committee on Food Labelling (CCFL) is more appropriate than the CCFNSDU to develop this definition, because added sugars should be labeled on all foods, not just foods for special dietary uses.</p> <p>Importantly we would like to flag the potential for commercial conflicts of interest between the manufacturers of packaged products that are high in added sugars and policymaking in this area, and suggest the development of any definition be made with sufficient safeguards to ensure the development of a comprehensive definition that includes all sugars harmful to health.</p>	<p>The Healthy Caribbean Coalition</p>
<p>The World Federation of Public Health Associations supports expedient development of a definition of added sugars given growing global interest in accelerating policies in this area. We would seek advice from the Codex Secretariat and WHO on who is best placed to develop a definition, however we believe CCFL is well placed to develop guidance around declaration of added sugars on labels.</p> <p>The World Federation of Public Health Associations note the potential for there to be commercial conflicts of interest between the profit motives of manufacturers of packaged products that are high in added sugars and evidence-informed policymaking in this area. WFPHA suggest that the development of any definition be made with sufficient safeguards to ensure the development of a comprehensive evidence-based definition that includes all sugars harmful to health.</p>	<p>World Federation of Public Health Associations</p>
<p>The Codex Committee on Nutrition and Foods for Dietary Uses (CCNFSDU) is the appropriate place to develop the definition for “added sugars and the Codex Committee on Food Labelling (CCFL) to endorse the mandatory quantitative nutrient and qualitative ingredient declaration labelling. As other CSOs and observers, we seek the advice of the Codex Secretariat and WHO to determine who is best placed to develop a definition, perhaps with reference to how definitions for similar food components have been developed historically. We stress the need to protect the process of commercial conflicts of interest between the manufacturers of packaged products that are high in added sugars and policymaking in this area, so we suggest these actors are not included in the process or have sufficient safeguards to ensure the development of this policy’s definition.</p>	<p>World Public Health Nutrition Association</p>

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

(YES, VOLUNTARY / YES, MANDATORY / NO / OTHER)

<p>Sí, debería ser obligatorio en concordancia con la normativa vigente en la República Argentina.</p>	<p>Argentina</p>
<p>YES, VOLUNTARY.</p> <p>Brazil understands that the inclusion of added sugars in the nutrient declaration list as mandatory is crucial to provide consumers with essential information for making informed food choices. This inclusion aligns with the purpose of the Guidelines on Nutrition Labelling, considering that prepackaged foods may contain added sugars, and it is supported by available scientific evidence regarding the negative impact of added sugars on health.</p>	<p>Brazil</p>
<p>Q6: NO and OTHER - Consultations that preceded Canada’s 2016 nutrition labelling amendments presented Canadian consumers with both proposals for the % Daily Value (DV) approach for total sugars as well as the approach for added sugars. The feedback received indicated that Canadians found the existing information about carbohydrates and total sugars confusing when added sugars were also declared, and they found the % DV approach easier to understand and more useful, particularly in association with the required % DV footnote which explains that 15% or more is a lot of a given nutrient. It is important to note that most foods that exceed the 15% DV threshold for “a lot” are foods that contain added sugars.</p> <p>Canada also considered that having an “added sugars” declaration would not be consistent with the World Health Organization (WHO) guideline on sugars, which recommends that people reduce their consumption of “free” sugars and not just of added sugars. Free sugars</p>	<p>Canada</p>

<p>include several sources of naturally occurring sugars, such as fruit juice and honey that would not be captured under an “added sugars” declaration but may still add considerable sugars and calories to a person’s diet. It is important to highlight that the human body metabolizes both naturally occurring sugars and those added to food and beverages in the same way, supporting the concept that the most relevant nutritional information is that of total sugars.</p> <p>In the end, Canada determined that a %DV declaration for total sugars and the grouping of sugars in the list of ingredients (also enacted in 2016) would be more meaningful to consumers and provide the information needed to reduce added sugars intake. Ingredient lists are required on prepackaged foods and can be used in conjunction with the total sugars declaration in nutrition labelling to identify the sources of sugars in a food. Canada has the following definitions to support requirements to declare total sugars in nutrition labelling and to group sugar-based ingredients in the list of ingredients:</p> <p>sugars means all monosaccharides and disaccharides; (sucre)</p> <p>sugars-based ingredient means, in respect of a prepackaged product,</p> <ul style="list-style-type: none"> • (a) an ingredient that is a monosaccharide or disaccharide or a combination of these; • (b) an ingredient that is a sweetening agent other than one referred to in paragraph (a); and • (c) any other ingredient that contains one or more sugars and that is added to the product as a functional substitute for a sweetening agent; (ingrédient à base de sucre) <p>Sweetening agent includes any food for which a standard is provided in Division 18, but does not include those food additives listed in the tables to Division 16; (agent édulcorant)</p> <p>Ref: B.01.001 of the Food and Drug Regulations https://laws-lois.justice.gc.ca/eng/regulations/C.R.C.%2C_c._870/page-2.html#docCont</p>	
<p>P6:Respuesta:OTROPrimero que todo, Chile quisiera confirmar si ¿el objetivo principal de la definición de “azúcares añadidos”, será la inclusión de esta información en la declaración de nutrientes (tabla nutricional).Distinguir entre azúcares totales y añadidos en las etiquetas de los productos puede llevar a una posible confusión al consumidor respecto al contenido total de azúcar en el producto, lo que podría llevar a errores, como sobreestimar la cantidad total de azúcares en el producto, sumando el total de los productos y azúcares añadidos.Sobre la necesidad de distinguir entre azúcares añadidos versus los azúcares intrínsecos, entendemos que se debería dejar dicha evaluación al CCFNSDU. Por otra parte, en este comité debería evaluarse la mejor forma para que el etiquetado del azúcar añadido no transmita información falsa, confusa o que pueda ser engañosa los consumidores. Por ejemplo, en los caso que podría desviar la atención del consumidor hacia el contenido de azúcar añadido, en lugar de la densidad general de nutrientes y la ingesta calórica o de otros nutrientes relevantes para la salud públicaEn resumen, también existen algunas desventajas y desafíos potenciales asociados con la declaración de azúcar agregada:Desafíos analíticos: Distinguir entre azúcares naturales y agregados puede ser un desafío analítico, particularmente cuando los azúcares son químicamente idénticos. Esto puede generar dificultades a la hora de medir y declarar con precisión los azúcares añadidos.Complejidad para los fabricantes de alimentos: Incluir azúcares agregados en la lista de declaración de nutrientes puede aumentar la complejidad de la formulación y el etiquetado de los productos alimenticios para los fabricantes. Ya que puede generar costos para la industria alimentaria, incluidos los costos asociados con las pruebas y la actualización del empaque Es posible que necesiten reformular los productos para cumplir con los requisitos de etiquetado, lo que podría afectar el sabor y la textura del producto especialmente aquellos que dependen del dulzor para su palatabilidad. Encontrar alternativas adecuadas que satisfagan las expectativas de sabor y al mismo tiempo reduzcan los azúcares añadidos puede resultar complicado.Potencial de confusión para el consumidor: existe el riesgo de confusión para el consumidor, especialmente si no comprende completamente la distinción entre azúcares agregados y azúcares naturales. Esto puede dar lugar a una mala interpretación de la información proporcionada en la etiqueta de nutrientes. Por ejemplo, los consumidores pueden percibir los productos con menor contenido de azúcar añadido como más saludables, incluso si la calidad nutricional general del producto es deficiente. Esto podría influir en las elecciones de los consumidores de maneras que pueden no alinearse con objetivos de salud más amplios.Cuestiones de armonización global: Lograr la armonización internacional sobre la</p>	<p>Chile</p>

inclusión de azúcares agregados puede ser un desafío debido a los diferentes patrones dietéticos, prácticas de procesamiento de alimentos y marcos regulatorios en todo el mundo. Es importante señalar que las desventajas percibidas pueden variar dependiendo de factores como las regulaciones específicas vigentes, el nivel de educación del consumidor y la respuesta de la industria alimentaria a los requisitos de etiquetado.	
<p>OTRO</p> <p>Es prematuro dar respuesta a esta pregunta. Antes de desarrollar una orientación sobre el etiquetado, debería definirse el término "azúcares añadidos". También se debe tener en cuenta que no existen métodos analíticos para distinguir los azúcares añadidos de los inherentes o de los azúcares totales, como se indicó atrás. Los carbohidratos totales y los azúcares totales ya forman parte de los nutrientes obligatorios de la etiqueta nutricional, por lo que los consumidores están informados del contenido de azúcares totales de los productos.</p> <p>No obstante, si luego de todos los debates, el consenso en el Codex es que el "azúcar añadido" deba ser parte de la declaración de nutrientes, debe darles la oportunidad a los miembros de decidir si lo incorporan o no en su normativa.</p>	Colombia
<p>OTRO</p> <p>Costa Rica apoya la inclusión del azúcar añadido en la lista de declaración de nutrientes en beneficio de la claridad y transparencia en la información proporcionada al consumidor. En la actualidad existe una creciente preocupación entre los consumidores sobre la cantidad y las fuentes de azúcares en los alimentos que consumen, lo que subraya la importancia de brindar información detallada y precisa para ayudar a los consumidores a identificar fácilmente los productos que contengan azúcares añadidos y tomar decisiones más saludables. También se debe tener en cuenta la existencia de metodologías que garanticen la precisión de la información proporcionada en las etiquetas.</p>	Costa Rica
P6. Sí, obligatorio	Cuba
YES, VOLUNTARY.	Cyprus
Sí, se debería incluir el azúcar añadido debido a que el fabricante, debe informar al consumidor sobre este nutriente crítico cuyo consumo excesivo implica afectaciones a la salud.	Ecuador
Yes, Codex should include added sugar on the nutrient declaration list.	Egypt
See reply under Question 4.	European Union
Con base que aún estamos solicitando la claridad sobre cuáles son los objetivos que persigue el Codex, por lo que no podríamos indicar o recomendar que la declaración de azúcares añadidos sea voluntario u obligatorio.	Guatemala
Yes, Voluntary. It should be decided by the regulatory authority whether declaration is mandatory.	Guyana
<p>Yes, Mandatory.</p> <p>India believes it is necessary to include added sugar in nutrient declaration list. This declaration of added sugars in nutritional labelling is important to provide consumers with accurate information about sugar content in foods, enabling them to make healthier choices and encouraging manufacturers to follow recommendations for reducing the amount of added sugars in their products.</p>	India
<p>YES, VOLUNTARY</p> <p>Rationale: Indonesia considers that added sugars should be included in the nutrient declaration list on a voluntary basis considering the absence of standardized testing method.</p>	Indonesia
Yes mandatory. In order to prevent losses to a certain group, it is suggested that all products that have simple sugars and sugars should include their amount on the product label.	Iran

Mandatory The right of consumer to decide what to consume and balance the diet in order to live healthy life	Iraq
Q6:NO We consider that flexible handling is necessary because the way of "added sugars" regulations including food labelling are different depending on the situation of "added sugars" intake etc. in each country or region. Therefore, we believe "added sugars" is one of nutrients that should operate within the scope of Section 3.2.1. of the Guidelines on Nutritional Labelling (CXG 2-1985), which provides about the declaration of "(t)he amount of any other nutrient considered to be relevant for maintaining a good nutritional status, as required by national legislation or national dietary guidelines.".	Japan
OTHER. The inclusion of added sugar in nutrient declaration whether mandatory or voluntary should largely depend on whether there is a Codex method of test to precisely determine the amount.	Kenya
Yes, Voluntary. In Malaysia, it is mandatory to declare on the amount of 'Total sugars'. As for the declaration of added sugars, Malaysia is in the opinion that it should be voluntary because it depends on the needs of each industry whether to differentiate it or not.	Malaysia
Other As outlined in our response to Question 5, New Zealand would like clarification on what the purpose of the term "added sugar(s)" is in this context. This clarification is important for New Zealand to be able to determine our support or otherwise, for including added sugar in the nutrient declaration list.	New Zealand
No, no vemos la necesidad.	Paraguay
NO. Comentario: Porque no se cuenta con método de análisis para verificar la cantidad de azúcares añadidos declarada en la etiqueta.	Peru
Yes, the inclusion of added sugar content on food labels is imperative in contemporary health considerations. Providing this information empowers consumers to make informed dietary choices, contributing to the prevention of chronic diseases associated with excessive sugar intake. Transparency in labeling aligns with global health trends, fosters public awareness, and supports regulatory efforts to mitigate the impact of added sugars on public health. Therefore, incorporating added sugar information on food labels is both a prudent and necessary measure.	Philippines
YES, MANDATORY Yes, it should be mandatory as the excessive intake of added sugars threatens the nutrient quality of the diet by providing significant energy with little other nutritional benefits, leading to unhealthy weight gain and increased risk of overweight and obesity and other NCDs. Additionally, the World Health Organization recommend reducing the intake of free sugars (which is all sugars added to food and beverages) to less than 10% of daily total energy intake (roughly 50g per day). To achieve this goal, consumers need to be informed about the added sugar content in products, empowering them to make healthier choices.	Saudi Arabia
YES, VOLUNTARY "Added sugar" can be included in the nutrient declaration list under Codex standard as a voluntary nutrient to be declared. This allows for flexibility so that countries which have issues with sugar intake can mandate the declaration of "added sugar" in their national legislation, while also changing the landscape in the food industry to encourage reformulation.	Singapore
• South Africa supports the inclusion of added sugar in the nutrient declaration list and welcomes the development of criteria on the inclusion thereof. It would be beneficial for both intrinsic and added sugar to be declared as a sub-component of total sugars in the nutrient declaration list.	South Africa

Cette inclusion devra être obligatoire car: i) ces ingrédients font l'objet de campagne d'éducation du consommateur pour réduire leur consommation en sucre; ii) il y a une confusion avec les sucres libres, les sucres naturellement présents dans les aliments et les sucres totaux.	Tunisia
YES MANDATORY	United Arab Emirates
OTHER. Many countries will already have nutrient declarations lists which will likely include sugars of some form (added, total, free etc), whether these are mandatory or voluntary. Total sugars are used in the UK and these are relatively easy to obtain by calculation using food/nutrition composition tables or through laboratory analysis of a food or drink. Where countries already have sugars (of some form) included in the nutrition declaration they may not accept this being replaced by added sugars. Some reasons for this are included in the answer to Q7 below.	United Kingdom
SI, OBLIGATORIO - En la revisión de la reglamentación actual, armonizada en MERCOSUR, se está trabajando en incluir este parámetro como información obligatoria en la tabla de información nutricional.	Uruguay
Yes, mandatory. Once Codex develops a definition for added sugars, the United States is of the view that it should be included on the nutrient declaration list and be mandatory. Doing so would support harmonization in nutrition labeling and contribute to global public health objectives.	USA
Q6. Other. ALAIAB propone que se defina el término "azúcares añadidos" antes de desarrollar una orientación sobre el etiquetado. Los carbohidratos totales y los azúcares totales ya forman parte de los nutrientes obligatorios de la etiqueta nutricional, por lo que los consumidores están informados del contenido de azúcares totales de los productos. Con respecto a si debe ser voluntario u obligatorio, creemos que en línea con el objetivo del Codex de ser referencia de normativa para los países, el etiquetado de los azúcares añadidos debe ser voluntario, y cada país decide si lo incorpora en su normativa nacional de forma voluntaria u obligatoria.	Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB)
NO. The current scientific evidence does not suggest any justification for the declaration of the "added sugars" content in addition to the total sugars value. As mentioned in Q4, all sugars deliver the same amount of calories (4 kcal/g) and are digested in the same way by the human body.	CEFS
Yes the inclusion of "added sugars" should be mandatory on the nutrient declaration list and as a percentage ingredient declaration. The disease reduction, health protection potential of full and factual information on food product labels is of critical importance. 1. For parents and caregivers of infants and toddlers: Food products for infants and young children such as cereal based foods and drinks for young children that often contain added sugars as sweetening agents, give rise to the consumption of "empty calories" and displays nutritional energy intake with non-nutritive energy intake at a crucial stage of growth and developmental, contributing to obesity and diet related non-communicable diseases. Additionally sweetened complementary foods and drinks set up a taste preference for sweet foods at an early age that may persist into adulthood. 2. For parents and caregivers: The production, marketing and consumption of sweetened foods for infants and children contribute to the malnutrition in all its forms of obesity and malnutrition. 3. For all consumers: The consumption of sugar-sweetened beverages (SSBs) has increased from 1990 to 2018 by 16% in 185 countries. Defining "added sugars" and mandating it on product labels will enable countries to implement excise taxes on SSBs to make those products less affordable and reduce consumption.	ENCA
NO. ENSA believes that refraining from including "added sugar" in nutrient declarations on food labels is recommended due to the metabolic equivalence of sugars, regardless of their origin. Hence, a distinction between the two does not appear to be of any need. While the intent is to provide consumers with more detailed information about the sugar content in a product, the potential for confusion arises as the current nutrition declaration already highlights the total sugar content, encompassing both naturally occurring sugars and those added during processing. The	ENSA

inclusion of an additional value for "added sugar" might lead consumers to believe that it is an extra amount, on top of the overall sugar content. The labelling of "total sugar" already provides for clear information while also facilitating comparison between different food products.	
NO: FIVS believes added sugars should not be included on the nutrient declaration list if the sugar levels in the final product are not above typical levels.	FIVS
YES, VOLUNTARY It will be preferred to keep the requirement voluntary to avoid any potential trade disruptions. Total carbohydrates and total sugars are already part of the mandatory nutrients in the nutrient declaration list. In addition, 'added sugars' are typically required to be listed as part of the ingredient declaration on product labels. Hence, consumers are informed on the total and added sugar contents of products. Most importantly, the enforcement of mandatory labelling will be hampered as there is no effective analytical method available to measure added sugars.	Food Industry Asia
NO. See Q4. Since sugars are metabolized identically, whether added or naturally occurring, there does not appear to be any need to distinguish between the two.	FoodDrinkEurope
YES, VOLUNTARY ICBA proposes that the term 'added sugars' be defined before developing labelling guidance. At this time, we believe that labelling should be voluntary to limit potential trade disruptions. Total carbohydrates and total sugars are already part of the mandatory nutrients of the nutrition label, so consumers are informed of total sugars content of products.	ICBA
YES, VOLUNTARY. Codex standards are generally voluntary, and this definition should also be voluntary, acknowledging the current lack of alignment among countries regarding mandatory declarations under their respective regulations.	IDF/FIL
Both 'added sugars' and naturally occurring sugars are metabolized identically by the human body and separating 'added sugars' from total sugars on labeling may cause consumer confusion. There are no testing methodologies that can differentiate added sugar from naturally occurring sugar sources, hence such labeling is dependent upon manufacturers and their supplier ingredient tracking to calculate for labels. The purpose behind the labeling of added sugars should be a reduction in caloric consumption in the human diet, particularly calories not associated with other nutrient benefits. IFT would ask Codex and CCFL to focus on label recommendations focused on management of the source of total caloric intake. IFT believes it should be voluntary, as part of a broader effort on total calorie intake labeling.	IFT
YES, MANDATORY. We believe that added sugars should be like other components required to be listed on a mandatory basis in the nutrient declaration (energy, saturated fat, sodium, total sugars, and some other nutrients of public health importance) under the Codex Guidelines on Nutrition Labelling, as well as its percentage contribution. Mandatory disclosure is the only way to ensure that added sugar content will be disclosed on all foods and beverages containing added sugars. Voluntary declarations are only likely to be made when a company perceives marketing benefits, such as when a product contains no or low amounts of added sugar. As a related example, five years after Australia's adoption of a voluntary Health Star Rating front-of-package nutrition labelling policy in 2014, the voluntary label (ranging from 1/2 to 5 stars) appeared on less than half of applicable products (41%) (1). To fully inform consumer choices, and contribute to public health benefits from reducing excess added sugar consumption, consumers must have this information on all packaged products. The mandatory quantitative reporting of the amounts of added sugar on the nutrient declaration (and ingredient) list could support added sugar reduction activities at the consumer, industry, and government levels. For consumers, reporting the amounts of added sugar on the nutrient declaration list (and ingredient list) can promote greater consumer understanding. Furthermore, the inclusion of added sugar on the nutrient declaration list could provide consumers with information they need to follow dietary guidelines, which could in turn encourage healthier choices. At the industry level, the inclusion of added sugar on the nutrient declaration list could encourage manufacturers to reduce added sugars in their products. For example, after trans fats were required to be included on the nutrient declaration list in the U.S., many manufacturers reformulated their products to reduce trans fat content (2). Inclusion of added sugar on the nutrition declaration list would also help government agencies and	International Association of Consumer Food Organizations

<p>researchers gather data to monitor added sugar content in the food supply over time and track trends in added sugar consumption, including differences in consumption across sociodemographic groups, and monitor compliance with voluntary or mandatory added-sugar-reduction programs. It would also allow for the evaluation of regulations, policies, and other efforts to reduce added sugar exposure and consumption. Furthermore, mandatory added sugar information on the nutrient declaration list would ensure fair competition between industries. When all companies are required to disclose the amount of added sugar in their products, it promotes fair competition. Companies would be compelled to compete on factors beyond taste, such as nutritional content. This would also provide a common ground for international trade by establishing standardized criteria for food products. Mandatory labelling of added sugar aligns with efforts to standardize information on nutritional content, making it easier for companies to adhere to consistent rules when trading across borders. It can simplify negotiations and help avoid trade barriers arising from differences in labelling requirements. Mandatory added sugar labelling would also enhance transparency in the food industry. Consumers are more likely to trust products with clear and accurate information, and this trust can be beneficial for industries. Finally, disclosing the added sugar content of foods and beverages on product packages can facilitate nutrition policies and regulations that have disclosure as a prerequisite. This includes nutrition standards for government and corporate food procurement, such as in schools to help improve the diet quality of children by limiting the amount of added sugar in products they are served, and front-of-package labelling regulations to make it easier for consumers to make informed, healthy choices when grocery shopping. References 1. Shahid M, Neal B, Jones A. Uptake of Australia's Health Star Rating System 2014-2019. <i>Nutrients</i>. 2020 Jun 16;12(6):1791. 2. Downs SM, Bloem MZ, Zheng M, Catterall E, Thomas B, Veerman L, Wu JH. The impact of policies to reduce trans fat consumption: A systematic review of the evidence. <i>Curr Dev Nutr</i>. 2017 Nov 13;1(12):cdn.117.000778.</p>	
<p>Yes the inclusion of “added sugars” should be mandatory on the nutrient declaration list and as a percentage ingredient declaration. The disease reduction, health protection potential of full and factual information on food product labels is of critical importance. Because: 1. Food products for infants and young children such as cereal based foods and drinks for young children³ that often contain added sugars as sweetening agents, give rise to the consumption of “empty calories” and displays nutritional energy intake with non-nutritive energy intake at a crucial stage of growth and developmental, contributing to obesity and diet related non-communicable diseases. Additionally sweetened complementary foods and drinks set up a taste preference for sweet foods⁴ at an early age that may persist into adulthood. 2. The production, marketing and consumption of sweetened foods for infants and children contribute to the malnutrition in all its forms of obesity and malnutrition⁵. 3. The consumption of sugar-sweetened beverages (SSBs) has increased from 1990 to 2018 by 16% in 185 countries⁶ as reported by Castor(2023). Additionally, citing the Euromonitor International (2022) WHO reports⁷ “The off-trade consumption of soft drinks, excluding bottled water, has increased by 21.2% globally in the last 15 years, with particularly high growth in Asia Pacific, Middle Eastern, and African countries”, noting that SSBs are the leading source of free sugars consumption. 4. Defining “added sugars” and mandating it on product labels will enable countries to implement excise taxes on SSBs to make those products less affordable and reduce consumption. Defining added sugars will also inform compositional restrictions to, for instance, prohibit their addition to infant and toddler foods or mandate time-limited reductions in other foods, especially soft drinks. CLICK HERE TO ADD COMMENTS TO THIS QUESTION</p>	<p>International Baby Food Action Network</p>
<p>ISDI believes it is premature to answer the question as indicated in Q4. Foods for special dietary uses will merit special attention in any work on added sugars. Moreover, ISDI notes that there are no analytical methods to distinguish added and inherent sugars or from the total sugars. There is no possibility to control the declaration. Such declaration is based on paper-work calculations and averaging as the variability of inherent sugars makes the task difficult and leads to the situation where the information on added sugars that would be on the label is often approximative/ misleading and leading to unfair competition between manufacturers’ declarations on labels that cannot be controlled analytically by competent authorities. It might represent a disproportionate administrative burden to companies.</p>	<p>International Special Dietary Food Industries</p>
<p>Yes we believe this should be mandatory in order to inform consumers, to incentivize industry reformulation (caution is needed to ensure that any reformulation is genuinely healthier, i.e. does not substitute one health-harming ingredient for another) and to support policies such as front of package nutrition warning labels and school food policies.</p>	<p>The Healthy Caribbean Coalition</p>

<p>The World Federation of Public Health Associations supports MANDATORY declaration of added sugar in the nutrient declaration list. We do so on the basis of similar requirements for other food components in current Codex Guidelines on Nutrition Labelling. WFPHA do not believe that voluntary declaration of added sugars will provide useful information to inform consumer choice. Voluntary declarations lead to selective application of this information on pack by the food industry, most likely in cases where it confers marketing benefit (i.e. to support a 'no added sugars' claim). However to fully inform consumer choice, and to provide them with information on products that are higher in added sugars and that they may want to limit in the diet, this information must be disclosed on a mandatory basis. Mandatory declaration will also increase the utility of this information to policymakers, for example, for use in front-of-pack nutrition labelling systems or other policies that could include added sugars in their nutrient profiling criteria.</p>	<p>World Federation of Public Health Associations</p>
<p>Yes WPHNA thinks that 'added sugars' declaration should be mandatory in the nutrient declaration under the Codex Guidelines on Nutrition Labelling, as well as its percentage contribution. Mandatory disclosure is the only way to ensure that added sugar content will be disclosed on all foods and beverages high in added sugars. To fully inform consumers of their choices and contribute to public health benefits from reducing excess added sugar consumption, consumers must have this information on all packaged products. The mandatory inclusion of added sugar on the nutrient declaration list could support added sugar reduction activities at the consumer, industry, and government levels. Disclosing the added sugar content of foods and beverages on product packages can facilitate nutrition policies and regulations with disclosure as a prerequisite. This includes nutrition standards in schools to help improve the diet quality of children by limiting the amount of added sugar in products they are served and front-of-package labelling regulations to make it easier for consumers to make informed, healthy choices when grocery shopping.</p>	<p>World Public Health Nutrition Association</p>

Q7: Do you see any barriers or limitations to the development of the definition of "added sugars" under the CCFL? Please explain. (Yes / No)

<p>Una de las principales limitaciones es el hecho de no contar con una metodología analítica que pueda diferenciar los azúcares añadidos de los totales. Asimismo, las diferencias entre los países respecto de las definiciones puede que dificulten el proceso de armonización.</p>	<p>Argentina</p>
<p>YES. Some barriers or limitations would be: (1) the development of different definitions of added sugars by countries, (2) the diversity of food ingredients containing sugars and that may be included in the definition of added sugars, and (3) the lack of specific analytical methods to quantify added sugars in most foods and beverages.</p>	<p>Brazil</p>
<p>Q7: NO - Canada does not have any concerns or foresee any barriers/limitations with a definition of "added sugars" being developed by Codex, noting the analytical and calculation challenges previously identified. Further, Canada has not experienced any barriers to trade in the current North American context, where the U.S. has an added sugars content declaration in their Nutrition Facts panel and Canada does not.</p>	<p>Canada</p>
<p>P7:Respuesta:OTROChile considera que la barrera o limitación es que no esté declarado el propósito de esta definición. Ahora bien, si el propósito es la declaración de nutrientes, y hoy sabemos que ésta declaración existe voluntariamente, no veríamos ninguna barrera técnica para dicha rotulación. Por lo tanto, insistimos que es de suma importancia definir el propósito y los objetivos de este trabajo. Por otro lado, creemos que el CCFL tiene que trabajar estrechamente con el CCMAS para que se desarrolle un método de cuantificación de azúcares añadidos que respalde la implementación en el futuro. Actualmente, no existe ningún método analítico práctico, fácilmente aplicable y fiable para distinguir entre azúcares naturales y azúcares añadidos en alimentos y bebidas. La EFSA reconoció que no existen métodos analíticos para distinguir entre azúcares añadidos/libres y otros azúcares presentes en los alimentos; (Autoridad Europea de Seguridad Alimentaria, 2018, Protocolo para el dictamen científico sobre el nivel de ingesta superior tolerable de azúcares en la dieta. EFSA Journal 2018;16 (8):5393, 47 pp. https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2018.5393). Por lo tanto, la ausencia de métodos analíticos fiables y tal vez, un obstáculo que podría conducir a la dificultad de trazar una línea clara entre estos dos tipos de azúcares y conduciendo a evaluaciones de cumplimiento difíciles.</p>	<p>Chile</p>

<p>SI</p> <p>El desarrollo de una definición de "azúcares añadidos" en los alimentos presenta varios desafíos y consideraciones, que pueden actuar como barreras o limitaciones. Algunos de estos desafíos incluyen:</p> <ol style="list-style-type: none"> 1. Complejidad científica: Determinar una definición precisa y universalmente aplicable para "azúcares añadidos" es científicamente complejo. En algunos casos, diferenciar entre azúcares naturales y azúcares añadidos puede resultar complicado, especialmente cuando los azúcares están presentes en matrices complejas. De todos modos, la definición debe tener una base científica sólida. <p>Es importante que la definición de azúcares añadidos enfatice la contribución nutricional relevante de mono- y disacáridos provenientes de distintas fuentes para evitar consecuencias indirectas y no intencionales. De lo contrario, la definición podría incluir ingredientes que precisamente proveen alternativas para reducir el contenido de azúcares añadidos en alimentos formulados. Tal es el caso de edulcorantes bajos en o sin calorías, o ingredientes que son fuentes de fibras dietéticas (que son consumidas por debajo de las recomendaciones de la OMS), que podrían ser injustamente discriminados si son incluidos en la definición de azúcares añadidos por contener trazas nutricionalmente insignificantes de azúcares provenientes de su proceso de manufactura.</p> <ol style="list-style-type: none"> 2. Diversas fuentes de azúcar: Los azúcares provienen de diversas fuentes y no todos los azúcares añadidos a los alimentos se distinguen químicamente de los presentes de forma natural. Por ejemplo, los azúcares presentes naturalmente en frutas y verduras pueden ser químicamente idénticos a los azúcares agregados durante el procesamiento. 3. Desafíos analíticos: No existen métodos analíticos para diferenciar los "azúcares añadidos" de los intrínsecos o de los azúcares totales. La declaración de "azúcares añadidos" se basa en cálculos teóricos lo que puede generar una carga administrativa para los fabricantes de alimentos. Al ser un cálculo teórico pueden existir variaciones en el reporte, lo que conduce a que la información sobre azúcares añadidos no sea exacta. La autoridad sanitaria no tiene mecanismos estandarizados y/o analíticos para controlar la información reportada por el fabricante. Desarrollar métodos precisos y estandarizados para analizar los azúcares agregados es crucial pero desafiante. Las técnicas analíticas deben ser sensibles, específicas y aplicables a una amplia gama de productos alimenticios. El CCFL tendrá que trabajar en estrecha colaboración con el CCMAS para desarrollar un método de cuantificación de los "azúcares añadidos" que apoye su aplicación en el futuro. 4. Complejidad del procesamiento de alimentos: la industria alimentaria es diversa y los azúcares añadidos pueden adoptar diferentes formas e incorporarse a diversos productos. Crear una definición que tenga en cuenta la multitud de formas en que se utilizan los azúcares en el procesamiento de alimentos es un desafío. 5. Armonización internacional: Lograr un consenso sobre una definición de azúcares añadidos se convierte en un desafío cuando se considera la armonización internacional. Diferentes países pueden tener diferentes hábitos alimentarios, prácticas de procesamiento de alimentos y marcos regulatorios. El desarrollo de definiciones para los azúcares añadidos puede verse influido por los marcos normativos existentes, que pueden variar ampliamente entre países. 6. Comprensión del consumidor: es importante desarrollar una definición que sea fácilmente comprensible para los consumidores de todo el mundo. Puede haber desafíos a la hora de comunicar conceptos complejos relacionados con los azúcares añadidos al público en general. 7. Ausencia de un VRN-ENT basado en estudios científicos para el consumo de azúcares añadidos. 8. Cambio de la comprensión científica: a medida que evoluciona el conocimiento científico, la comprensión de los impactos de los diferentes tipos de azúcares en la salud puede cambiar, lo que requiere ajustes en las definiciones. 	<p>Colombia</p>
<p>NO</p> <p>Costa Rica no considera que existan barreras para el desarrollo de la definición en sí. No obstante, para considerar la declaración obligatoria del azúcar añadido existen limitaciones analíticas que deberían abordarse posteriormente.</p>	<p>Costa Rica</p>

<p>Los niveles de azúcares añadidos deben ser calculados por el fabricante en función de los ingredientes que componen la formulación del producto, dado que en general ninguno de los métodos tradicionales de determinación de azúcares puede diferenciar entre un azúcar añadido o intrínseco. Esto sólo aplicaría para productos con una formulación muy simple, por ejemplo, una leche saborizada constituida por dos ingredientes, donde la lactosa generalmente proviene únicamente de la leche, mientras que la sacarosa que se cuantifique corresponderá al azúcar añadido.</p> <p>Para ampliar más, un método HPLC tiene la capacidad de separar y cuantificar individualmente tanto, azúcares reductores (ej. fructosa, glucosa, lactosa, maltosa, etc) como no reductores (ej. sacarosa), pero no es posible diferenciar si dichos azúcares provienen de una fuente natural o son ingredientes grado alimenticio disponibles comercialmente; tampoco es posible diferenciar si el azúcar proviene de jugo natural o de pulpa concentrada.</p> <p>En estos casos las diferencias se encuentran a niveles de huella isotópica, pero son técnicas demasiado onerosas y poco prácticas para este fin, además de que implican una investigación científica extensa para definir los factores de discriminación para asegurar su origen.</p>	
P7. No	Cuba
NO	Cyprus
Sí. Podrían existir barreras en cuanto a las presiones comerciales para objetar la adopción de esta definición por parte del Codex Alimentarius.	Ecuador
No limitations to the development of the definition of "added sugars" under the CCFL when the nutrient declaration list include added sugar.	Egypt
<p>Yes.</p> <p>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 vegetables, the introduction of a new nutrition labelling item that would differentiate between total sugars and added/free sugars is not justified.</p> <p>See also the reply provided under Question 4 for further information.</p>	European Union
Los niveles de azúcares añadidos deben ser calculados por el fabricante en función de los ingredientes que componen la formulación del producto, la medición analítica no podrá distinguir entre azúcares intrínsecos y "azúcares añadidos".	Guatemala
No	Guyana
<p>CCFL might face following scientific / technical barriers or limitations for the development of the definition of 'added sugars':</p> <ol style="list-style-type: none"> 1. Recognition of nutritional aspects as added sugars from free or total sugars. 2. Difference in ingredients/ commodities and their compositions contributing to added sugar. 	India
<p>YES</p> <p>Rationale: Indonesia considers that the following factors could potentially hinder the development of a definition of added sugars:</p> <ol style="list-style-type: none"> 1. The standard testing method has not been established. 2. If the testing method cannot be established, a calculation method based on composition needs to be established. 	Indonesia
No	Iran
<p>NO</p> <p>There are no barriers or limitations</p>	Iraq
<p>Q7: YES</p> <p>In order to consider the declaration of "added sugars", it is presupposed to qualify the analysis method of "added sugars" for the basis of</p>	Japan

labelling as the method of the Guidelines on Nutrition Labelling in CCMAS' Recommended methods of analysis and sampling (CXS 234-1999), which we need to work out and discuss.	
YES. The only possible barrier/limitation will be on ToR/expertise given that the term in question may not necessarily be within the mandate of CCFL. However, we note that Codex Committee on Sugar (CCS) which would have been the appropriate committee to provide the define was adjourned sine die hence it is not active. CCFL before starting the definition may request the Codex Secretariat to allow/mandate it undertake the work given that CCS is an adjourned committee.	Kenya
Yes. Malaysia is in the opinion that the discussion on the development of the definition of 'added sugars' should be discussed further under the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) since it is related to the daily sugar intake for each person. CCFL only can discussed on how the claim of 'added sugars' can be made on the label with the criteria set by CCNFSDU.	Malaysia
<p>YES</p> <p>Since 2021 Food Standards Australia New Zealand have been considering a definition of "added sugar(s)" for Australia and New Zealand. This has been done through a proposal to include added sugars content in the nutrition information panel (P1058) and a proposal on defining added sugars for claims (P1062). During this work many challenges have been encountered in developing a definition of "added sugar(s)".</p> <p>Some key barriers/challenge include:</p> <ul style="list-style-type: none"> • Lack of analytical method to distinguish added sugar as distinct from total sugar. Therefore, need to manually calculate added sugar content. • Lack of global agreement on definition of "added sugars" and use of other terminology to describe sugars which should be limited for health purposes (free sugars, liberated sugars). These terms are often used interchangeably, though they are not thought to be well understood by consumers. • Determining which (if any) sugar-based ingredients should be included in a definition of "added sugar(s)". For example, dietary guidelines may recommend limiting some foods that are high in intrinsic sugars that are concentrated, such as fruit juice, dried fruit, honey. • Whether to include single ingredient foods in the definition of "added sugar(s)" for example a bag of sugar. • Treatment of different types of sugar. For example, low energy sugars, sugars used as carriers, sugars formed during hydrolysis and fermentation. <p>The biggest challenge we have faced is that the purpose of including "added sugar(s)" content in the nutrition information panel was to allow consumers to make informed choices in support of the dietary guidelines which directs consumers to limit their intake of "added sugar(s)". If the purpose was to quantify sugars physically added to foods alone then development of a definition for "added sugar(s)" would have been more straightforward, but ultimately less effective for consumers and health outcomes.</p> <p>Further information on the challenges and considerations on the development of an added sugar(s) definition in New Zealand and Australia can be found in Food Standards Australia New Zealand approval report for P1062: https://www.foodstandards.govt.nz/sites/default/files/2023-11/P1062%20Approval%20report%20%281%29.pdf. Note there is still ongoing work on P1058 and as such there could be further changes to the definition in P1062 to ensure regulatory coherence.</p>	New Zealand
Podrían existir limitaciones teniendo en cuenta la diversidad de entendimiento que existe en relación a cuales serian los azúcares añadidos Ej: Maltodextrina, Frutas en trozos, frutas deshidratadas o liofilizadas, Jugos sin agregados de otros ingredientes etc. Por ello, es importante que el tema sea definido por el Codex de manera a poder tener claridad.	Paraguay
<p>Si. Comentarios:</p> <p>1. Complejidad científica: Determinar una definición precisa y universalmente aplicable para "azúcares añadidos" es científicamente complejo. En algunos casos, diferenciar entre azúcares naturales y azúcares añadidos puede resultar complicado, especialmente cuando los azúcares están presentes en matrices complejas. 2. Diversas fuentes de azúcar: Los azúcares provienen de diversas fuentes y no todos los azúcares</p>	Peru

<p>añadidos a los alimentos se distinguen químicamente de los presentes de forma natural. Por ejemplo, los azúcares presentes naturalmente en frutas y verduras pueden ser químicamente idénticos a los azúcares agregados durante el procesamiento.</p> <p>3. Armonización internacional: Lograr un consenso sobre una definición de azúcares añadidos se convierte en un desafío cuando se considera la armonización internacional. Diferentes países pueden tener diferentes hábitos alimentarios, prácticas de procesamiento de alimentos y marcos regulatorios. 4. Comprensión del consumidor: es importante desarrollar una definición que sea fácilmente comprensible para los consumidores de todo el mundo. Puede haber desafíos a la hora de comunicar conceptos complejos relacionados con los azúcares añadidos al público en general.</p>	
<p>Industry Concerns: The food industry may raise concerns about the feasibility and practicality of implementing certain aspects of the definition, especially if it entails significant changes to existing labeling practices.</p> <p>Aside from significant changes in labeling, there might also be a limitation in the test method for determining whether the sugar is added to the food or inherent in the food.</p>	Philippines
<p>YES</p> <p>The main barrier is that there are different definitions from various resources. Therefore, it is essential to develop a single comprehensive definition, and as mentioned in question 4, we suggest adopting the World Health Organization's definition of added sugar.</p>	Saudi Arabia
NO	Singapore
NO	South Africa
<p>Il n'y a aucune limitation, à condition d'intégrer le Comité du Codex sur la nutrition et les Aliments diététiques ou de régime (CCNFSDU) cette inclusion devra être obligatoire car: i) ces ingrédients font l'objet de la campagne d'éducation du consommateur pour réduire leur consommation en sucre; ii) il y a une confusion avec les sucres libres, les sucres naturellement présents dans les aliments et les sucres totaux.</p>	Tunisia
NO	United Arab Emirates
<p>YES. Total sugars can be easily calculated using food/nutrition composition tables; and/or can easily be provided through laboratory analysis of a food or drink. It may be more difficult and more costly (in terms of time taken and financial resource) for businesses to calculate the added sugars content of foods, compared to total sugars or whatever other figure for sugars is currently used on pack. This is because the added sugars content may need to be calculated for individual ingredients in a food product as well as for the product overall. Data to enable this to happen may not be readily available. Governments may also need to provide detailed guidance to enable and ensure that businesses are consistent in how added sugars are calculated in composite products. This can be a resource intensive process. It may be difficult for countries to get businesses to change from whatever declaration is currently used on pack to one for added sugars unless there is clear reasoning and incentive for them to do so.</p>	United Kingdom
<p>SI - Al contarse con el antecedente de la OMS, no visualizamos dificultad en el desarrollo de la definición. Entendemos que la dificultad esta en la declaración se basa en datos de formulación del producto, y no puede verificarse por medios analíticos en forma directa.</p>	Uruguay
<p>Yes. As noted above, the United States believes that CCNFSDU is best suited to develop the definition of "added sugars," based on its expertise and terms of reference. The Committee that develops the definition will need to consider 'added' versus 'free' sugars and how they fit within the definition, particularly with respect to fruit juices. A potential limitation in these discussions in terms of verification by national authorities is that conformity/compliance assessment for added sugars declaration is dependent on recordkeeping rather than determination by analytical methods.</p>	USA

<p>Q7. YES</p> <p>Los niveles de azúcares añadidos deben ser calculados por el fabricante en función de los ingredientes que componen la formulación del producto.-La medición analítica no podrá distinguir entre azúcares intrínsecos y "azúcares añadidos".</p>	<p>Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB)</p>
<p>YES. To the best of CEFS' knowledge, there is still a lack of any practical, easily enforceable, and reliable analytical method to distinguish between naturally occurring and added sugars in food and drinks. Therefore, this is a crucial obstacle that could lead to the difficulty of drawing a clear line between these two types of sugars and would lead to difficult compliance assessments.</p>	<p>CEFS</p>
<p>Yes</p> <p>Barriers to the development of the definition of "added sugars" would primarily come from interference from the processed foods and sugar industries.</p> <p>WTO challenges by producing countries can seriously undermine national public health regulations on added sugar limitations and on the implementation of taxes on high sugar foods and beverages. Therefore an international agreed definition is needed.</p> <p>The lack of independent policy making in many countries and even at international level where industry participation often outnumbers public health participants is a barrier that results in "compromised" policy outcomes and fails to effectively protect consumers, resulting in unhealthy products in the market place that have inadequately nutrition and ingredient disclosures, inadequate health risk warnings, resulting in increased costly health outcomes and lost DALYs.</p> <p>Codex must ensure that its mandate to protect consumer health is upheld.</p>	<p>ENCA</p>
<p>Yes. There is still a lack of practical, easily enforceable, and reliable analytical methods for distinguishing between naturally occurring and added sugars in food and beverages. The European Food Safety Authority (EFSA) also acknowledged this limitation, stating in 2018 that there are no analytical methods available to distinguish between added/free sugars and other sugars present in foods (Protocol for the scientific opinion on the Tolerable Upper Intake Level of dietary sugars. EFSA Journal 2018;16(8):5393, 47 pp. https://efsa.onlinelibrary.wiley.com/doi/full/10.2903/j.efsa.2018.5393). Consequently, the absence of such reliable analytical methods poses a challenge, making it difficult to establish a clear distinction between these two types of sugars and complicating compliance assessments.</p>	<p>ENSA</p>
<p>NO: FIVS does not see any barriers/limitations to the development of the definition of "added sugars" under the CCFL.</p>	<p>FIVS</p>
<p>YES</p> <p>As there is no chemical distinction between naturally occurring and added sugars, therefore no analytical methods to do determine added sugar content. Hence, levels must be calculated via a manual process reliant on each product formula and the specific ingredients added. Providing guidance on the calculation of added sugars would be helpful, such as handling of single ingredient sugars and syrups like maple syrup and honey.</p> <p>The scope of the definition's use must be clearly defined, such as promoting consumer understanding, facilitating labelling requirements or supporting public health goals, to ensure its suitability for the intended purpose. This consideration is crucial when establishing the threshold value for "no added" claims.</p> <p>Incidental sugars within products need to be considered for the impact in any potential definition. For example, added sugar is a common carrier for delivering additives and micronutrients into foods. These are present in negligible amounts, are not added for sweetening purposes and may help deliver nutrients to consumers. Therefore, it is recommended that these types of sugars should not be included in any definition of added sugars.</p> <p>The definition of "added sugars" must be based on sound scientific evidence and take into account the latest understanding of scientific data</p>	<p>Food Industry Asia</p>

<p>such as review of the scientific evidence related to ingredients on cariogenic potential, metabolism, caloric value, and glycaemic response, which may lead to excluding ingredients from the definition of added sugars, e.g., Allulose. Initial work in this direction has been proposed in Europe as seen in the linked research article [https://www.nature.com/articles/s41430-020-0575-x]. However, further development is needed.</p>	
<p>YES. To the best of our knowledge there is still lack of any practical, easily enforceable, and reliable analytical method to distinguish between naturally occurring and added sugars in food and drinks. EFSA also acknowledged that there are no analytical methods to distinguish between added/free sugars and other sugars present in foods” (European Food Safety Authority, 2018, Protocol for the scientific opinion on the Tolerable Upper Intake Level of dietary sugars. EFSA Journal 2018;16(8):5393, 47 pp. https://efsa.onlinelibrary.wiley.com/doi/full/10.2903/j.efsa.2018.5393). Therefore, the absence of reliable analytical methods is a hurdle that could lead to difficulty of drawing a clear line between these two types of sugars and could lead to difficult compliance assessments.</p>	FoodDrinkEurope
<p>YES. Levels of added sugars must be calculated by the manufacturer based on the ingredients that make up the product’s formulation (see answer to Q3). Analytical measurement will not be able to distinguish between intrinsic and ‘added sugars.’</p>	ICBA
<p>IDF would like to emphasize that, in the case of Codex proceeding to define the term, the definition of ‘added sugars’ should clearly differentiate between ‘free’ or ‘added’ sugars and naturally occurring sugars. The definition of ‘added sugars’ should exempt the naturally occurring milk sugar, lactose. Regarding the general sugar discussion, we would like to point out, that there is no evidence linking naturally occurring sugars (such as lactose from dairy products) with non-communicable disease (NCD) risk (Paques & Lindner, 2019). One reason for this is likely due to naturally occurring sugars being contained within complex structures (food matrix) of other beneficial nutrients that together have positive health effects. The implementation of various dietary strategies or food policies aimed at improving health locally or regionally, often focuses on the ‘total’ sugar content when evaluating the healthiness of foods, without differentiating between ‘added’ sugars and naturally occurring sugars. It is important that the intent of the policy is considered, and coherence is considered with other policies such as dietary guidelines. If this is not done, it risks unduly penalizing nutrient-dense nutritious foods such as dairy which contain natural sugars. Therefore, IDF believes that dairy foods, as part of a healthy and balanced diet, should not be unintentionally penalized in guidelines for using nutrition claims due to their content of lactose.</p>	IDF/FIL
<p>We are not aware of any reliable analytical methods to distinguish between added sugars and other sugars present in foods, with added sugars being calculated manually. Both food businesses and consumers may find the distinction between total sugars and ‘added sugars’ difficult to understand.</p>	IFT
<p>Yes Barriers to the development of the definition of “added sugars” would primarily come from interference from the processed foods and sugar industries. WTO challenges by producing countries can seriously undermine national public health regulations on added sugar limitations and on the implementation of excise taxes on high sugar foods and beverages. Therefore an international agreed definition is needed. The lack of independent policy making in many countries where industry participation often outnumbers public health participants is a barrier that results in “compromised” policy outcomes and fails to effectively protect consumers, resulting in unhealthy products in the market place that have inadequately nutrition and ingredient disclosures, inadequate health risk warnings, resulting in increased costly health outcomes and lost DALYs. Codex must ensure that its mandate to protect consumer health is upheld to mitigate such barriers.</p>	International Baby Food Action Network
<p>Codex is committed to developing science-based standards. As stated in question 6, ISDI notes that there are no analytical methods to distinguish added and inherent sugars or from the total sugars. There is no possibility to control the declaration. Such declaration is based on paper-work calculations and averaging as the variability of inherent sugars makes the task difficult and leads to the situation where the information on added sugars that would be on the label is often approximative/ misleading and leading to unfair competition between manufacturers’ declarations on labels that cannot be controlled analytically by competent authorities. It might represent a disproportionate administrative burden to companies.</p>	International Special Dietary Food Industries

CCFL has to work closely with CCMAS to develop a quantification method for added sugars which will support implementation in the future. ISDI would request an assessment of the level of priority to these committees and Codex' overall agenda.	
Definitions must take into consideration constraints in resource limited settings however the challenges are not insurmountable and do not outweigh the benefits of a comprehensive definition which allows for improved consumer diets.	The Healthy Caribbean Coalition
<p>The World Federation of Public Health Associations sees several potential barriers that would need to be addressed by CCFL or any other body developing a definition of added sugars.</p> <p>Firstly, as noted previously, we suggest that Codex recognise the need to safeguard evidence-based policymaking in this area from conflicted interests, for example, from the manufacturers of profitable products that are high in added sugars and who may oppose such labelling.</p> <p>Other potential considerations for Codex include the term 'added sugars' itself, given complexities in this area. These include the fact that many sugars that consumers should limit or avoid in their diets are not physically added by the manufacturer to products but are added or increased by processing mechanisms like hydrolysis, fermentation or the processing of fruits and vegetables (i.e. juicing, macerating, pureeing). For example, World Health Organization (WHO) work in this area uses the term 'free sugar' to cover sugars that consumers should limit in their diets. 'Free sugar' includes many sugars considered to be 'added sugars' and also additional sugars based on their links to health harms, including some processed fruit sources.</p> <p>WFPHA strongly advocates for the adoption of a comprehensive definition of 'added sugars' that includes these 'free sugars' components and other sugars covered by emerging health evidence, including those from processing methods that result in or increase sugars. To adopt a narrow definition of 'added' sugars would limit the benefits of this reform to consumers and public health.</p> <p>Other potential barriers at the edges of this policy include how to manage declaration of added sugars on single ingredient product labels such as those of honey and maple syrup. These substances are consistently classified as added sugars, but treatment of these products when they are sold as single ingredient products is more challenging. From a public health perspective, WFPHA believes that the sugars in these products when sold as a standalone item should be treated in the same way as when they appear as an ingredient in other foods – given that their health effects are the same. If these products fall outside labelling reforms, it may perpetuate their misleading health halo</p>	World Federation of Public Health Associations
Barriers to the development of the definition of "added sugars" would primarily come from interference from the processed foods and sugar industries. We stress the need to protect the process of commercial conflicts of interest between the manufacturers of packaged products that are high in added sugars and policymaking in this area, so we suggest these actors are not included in the process or have sufficient safeguards to ensure the development of this policy's definition.	World Public Health Nutrition Association

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

No tenemos	Argentina
If a definition of added sugars is developed, Brazil understands that consideration could be given to the development of a non-exhaustive list to exemplify the types of added sugars included in the definition. This approach could facilitate understanding, implementation, and monitoring.	Brazil
Q8: Canada has no additional information for consideration.	Canada
P8:Respuesta:Chile considera que;1) La definición (Directrices) debería estar completamente alineada con la Norma del CODEX sobre declaraciones de propiedades nutricionales y saludables.(CAC/GL 23-1997). GUIDELINES FOR USE OF NUTRITION AND HEALTH CLAIM:7.1 No adición de azúcares. Se podrán realizar declaraciones relativas a la no adición de azúcares a un alimento siempre que se cumplan las siguientes condiciones.(a) No se han agregado azúcares de ningún tipo al alimento (Ejemplos: sacarosa, glucosa, miel, melaza, jarabe de maíz, etc.);(b) El alimento no contiene ingredientes que contengan azúcares como ingrediente (Ejemplos: mermeladas, chocolate endulzado, trozos de fruta endulzados, etc.);(c) El alimento no contiene ingredientes que contengan azúcares que sustituyan los azúcares	Chile

<p>agregados (Ejemplos: jugo de frutas concentrado no reconstituido, pasta de frutas secas, etc.); y(d) El contenido de azúcares del alimento en sí no se ha incrementado por encima de la cantidad aportada por los ingredientes por algún otro medio.(Ejemplo: el uso de enzimas para hidrolizar almidones para liberar azúcares).2) Propósito: Definir claramente el propósito para establecer definiciones de azúcares añadidos, como promover la comprensión del consumidor, facilitar los requisitos de etiquetado o apoyar objetivos de salud pública.3) Base científica: garantizar que las definiciones se basen en evidencia científica sólida y tener en cuenta los datos científicos más recientes, como la revisión de la evidencia científica relacionada con los ingredientes sobre el potencial cardiogénico, metabolismo, el valor calórico y la respuesta glicémica, que pueden conducir para excluir ingredientes de la definición de azúcares añadidos, por ejemplo, alulosa.4) Cuantificación de azúcares añadidos. El CCFL tiene que trabajar con el CCMAS para desarrollar otros métodos relacionados con la cuantificación de azúcares añadidos como información adicional para apoyar la futura implementación de la definición en las directrices.5) Deberían analizarse previamente las estrategias de gestión de riesgo, respecto de la rotulación, para evitar o disminuir el consumo de azúcares en la población. Y posteriormente, proponer entre las estrategias vía rotulación de alimentos, la más idónea para resolver el problema detectado.El trabajo sobre definición del problema, y luego del abordaje o gestión de dicha estrategia, debería ser compartido entre CCFL y CCNFSDU.Hasta ahora, no vemos claramente la necesidad de iniciar este trabajo en el CCFL</p>	
<p>1. Finalidad: Definir claramente la finalidad para establecer una definición de azúcares añadidos.</p> <p>2. Base científica: Asegurarse de que las definiciones se basen en pruebas científicas sólidas y tengan en cuenta los conocimientos científicos más recientes, como una revisión de la evidencia científica relacionada con los ingredientes sobre el potencial cariogénico, el metabolismo, el valor calórico y la respuesta glucémica, lo que puede llevar a excluir ingredientes de la definición de azúcares añadidos, por ejemplo, Alulosa y Lactosa en FUF, la cual es recomendada por el Codex Stand 156 Rev 2023, como carbohidrato de preferencia en las fórmulas de continuación.</p> <p>3. Armonización global: Apuntar a la armonización internacional para facilitar el comercio. Colaborar con los miembros para establecer puntos comunes y definiciones armonizadas</p> <p>4. Las Directrices del Codex para el uso de declaraciones nutricionales y de propiedades saludables (CAC/GL 23-1997); y en particular:</p> <p>7.1 No adición de azúcares Podrán formularse declaraciones relativas a la no adición de azúcares a un alimento siempre que se cumplan las siguientes condiciones.</p> <p>a) No se han añadido azúcares de ningún tipo a los alimentos (Ejemplos: sacarosa, glucosa, miel, melaza, jarabe de maíz, etc.);</p> <p>(b) El alimento no contiene ingredientes que contengan azúcares como ingrediente (Ejemplos: mermeladas, jaleas, chocolate azucarado, trozos de fruta endulzados, etc.);</p> <p>c) El alimento no contiene ingredientes que contengan azúcares que sustituyan a los azúcares añadidos (ejemplos: zumo de fruta concentrado no reconstituido, pasta de frutos secos, etc.);</p> <p>y d) El contenido de azúcares del propio alimento no se ha incrementado por encima de la cantidad aportada por los ingredientes por otros medios (ejemplo: el uso de enzimas para hidrolizar los almidones para liberar azúcares).6) Solicitar al CCMAS asesoramiento sobre la metodología para cuantificar los azúcares añadidos, que puedan adoptarse a nivel mundial.</p> <p>5. Practicidad para la implementación: considerar la viabilidad de implementar la definición en una amplia gama de productos alimenticios. Evaluar la disponibilidad y confiabilidad de métodos analíticos para medir azúcares agregados y evaluar la practicidad para su uso en la industria alimentaria.</p> <p>6. Comprensión del consumidor: desarrollar una definición que sea fácilmente comprensible para los consumidores.</p>	<p>Colombia</p>

<p>7. Flexibilidad para la Industria Alimentaria: Reconocer la diversidad de productos y formulaciones alimentarias. Proporcionar un nivel de flexibilidad que permita a la industria alimentaria cumplir con la definición sin interrupciones significativas en la formulación de productos y los procesos de producción.</p> <p>8. Evaluación del impacto en la salud: Considerar el impacto potencial en la salud de diferentes tipos de azúcares y su contribución a los problemas de salud relacionados con la dieta. Alinear la definición con los objetivos de salud pública, ayudando a los consumidores a tomar decisiones informadas y más saludables.</p> <p>9. Valorar la posibilidad de que el CCNFSDU desarrolle un VRN-ENT para los azúcares añadidos.</p> <p>10. Revisión y actualización periódicas: Reconocer que el conocimiento científico evoluciona y que los patrones dietéticos pueden cambiar. Establecer un mecanismo para la revisión y actualización periódica de la definición para incorporar nuevos hallazgos científicos y responder a las preocupaciones de salud emergentes.</p> <p>11. Colaboración con las partes interesadas: Colaborar con las partes interesadas, incluidos científicos, expertos en salud pública, grupos de defensa del consumidor y la industria alimentaria. Considerar sus aportes y comentarios durante el desarrollo y perfeccionamiento de la definición.</p> <p>12. Consideración de las consecuencias no deseadas: Anticipar y evaluar las posibles consecuencias no deseadas de la definición. Evaluar cómo podrían responder la industria alimentaria y los consumidores y abordar las consecuencias negativas que puedan surgir.</p> <p>13. Iniciativas educativas: Acompañar la implementación de la definición con iniciativas educativas para informar a los consumidores, partes interesadas de la industria y organismos reguladores sobre el propósito y las implicaciones de incluir azúcares agregados en las etiquetas de nutrientes.</p> <p>14. Considerar las siguientes exclusiones de la definición de azúcares añadidos:</p> <ul style="list-style-type: none"> • Ingredientes alimentarios que contienen mono y disacáridos naturalmente presentes, que son añadidos a los alimentos con un efecto funcional distinto al de incrementar el contenido de azúcar en los alimentos. • mono y disacáridos que no producen una respuesta glucémica o insulinémica y/o que no se absorben en el intestino delgado, • ingredientes alimentarios que contienen trazas de azúcares derivados de su proceso de manufactura o de sus coadyuvantes de manufactura, cuando esos azúcares no fueron agregados con la intención de aumentar el contenido de azúcar y no tienen ningún efecto funcional en el producto terminado. <p>15. Azúcares raros. Se debe contemplar una posición frente a los azúcares raros, que son ingredientes emergentes que se están utilizando como alternativa al uso de azúcares y /o edulcorantes</p>	
<p>Costa Rica considera útil discutir sobre los ingredientes que pueden considerarse fuentes de azúcares añadidos. Se deben revisar las Directrices para el uso de declaraciones nutricionales y saludables CXG 23-1997 para garantizar que las declaraciones de "sin azúcares añadidos" estén cubiertas adecuadamente o si pueden ser necesarias modificaciones.</p> <p>También se recomienda tomar como referencia definiciones ya aplicadas por los gobiernos. Ejemplo, USA (FDA): https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-declaration-added-sugars-honey-maple-syrup-other-single-ingredient-sugars-and, MX (NOM-051), MERCOSUR.</p> <p>Posteriormente, sería necesario solicitar al Comité del Codex sobre Métodos de Análisis y Toma de Muestras (CCMAS) asesoramiento sobre la metodología para cuantificar los azúcares añadidos, así como valorar la posibilidad de que el CCNFSDU desarrolle un VRN-ENT para estos azúcares.</p>	<p>Costa Rica</p>

P8: Todo elemento que aporte dulzor, las esencias, carbohidratos como maltodextrina	Cuba
Ecuador observa con preocupación que los azúcares que están presentes en los alimentos han sido generados por procesos enzimáticos durante la industrialización, generando así un efecto fisiológico igual al de los azúcares añadidos, y podrían eludir su declaración, al no ser estrictamente “añadidos”; por lo que, se debería considerar mecanismos para que este tipo de azúcares estén incorporados en el etiquetado nutricional.	Ecuador
Attention shall be paid to clarifying that “added sugars” are originally carbohydrates and are added to food to obtain a sweet taste.	Egypt
Tomar en cuenta lo siguiente:1) La definición debería estar completamente alineada con las Directrices del Codex para el uso de declaraciones nutricionales y saludables (CAC/GL 23-1997); y en particular:7.1 No adición de azúcaresSe podrán realizar declaraciones relativas a la no adición de azúcares a un alimento siempre que se cumplan las siguientes condiciones.(a) No se han agregado azúcares de ningún tipo al alimento (Ejemplos: sacarosa, glucosa, miel, melaza, jarabe de maíz, etc.);(b) El alimento no contiene ingredientes que contengan azúcares como ingrediente (Ejemplos: mermeladas, jaleas, chocolate endulzado, trozos de fruta endulzados, etc.)	Guatemala
Codex while defining added sugar should consider GUIDELINES FOR USE OF NUTRITION AND HEALTH CLAIM (CAC/GL 23-1997) which defines conditions for 'non addition of sugars' claims as below: 7.1 Non-Addition of Sugars-Claims regarding the non-addition of sugars to a food may be made provided the following conditions are met. (a) No sugars of any type have been added to the food (Examples: sucrose, glucose, honey, molasses, corn syrup, etc.); (b) The food contains no ingredients that contain sugars as an ingredient (Examples: jams, jellies, sweetened chocolate, sweetened fruit pieces, etc.); (c) The food contains no ingredients containing sugars that substitute for added sugars (Examples: non-reconstituted concentrated fruit juice, dried fruit paste, etc.); and (d) The sugars content of the food itself has not been increased above the amount contributed by the ingredients by some other means (Example: the use of enzymes to hydrolyze starches to release sugars).	India
Indonesia also proposes that CCFL should coordinate with CCMAS regarding the analytical method.	Indonesia
None	Kenya
Classification is based on the amount of sugar needed. For example: no sugar, no sugar, low sugar, high sugar	Iran
No additional suggestion at the moment.	Malaysia
It will be important for CCFL to be clear what labelling purpose(s) a definition of added sugar will be used for to ensure any definition developed meets this purpose(s). New Zealand considers that any definitions for “added sugar(s)” developed by Codex should be fit for purpose for many potential labelling purposes, not just for inclusion in the nutrient list.	New Zealand
Es importante que la definición no sea taxativa, entendiendo que existen innovaciones alimentarias todo el tiempo, y esto podría requerir actualizar la definición o la lista de lo que se entiende por azucares añadidos en el caso que sea demasiado específica.	Paraguay
Comentarios: 1. Marcos normativos: El desarrollo de definiciones para los azúcares añadidos puede verse influido por los marcos normativos y normativas existentes, que pueden variar ampliamente entre países. 2. Cambio de la comprensión científica: A medida que evoluciona el conocimiento científico, la comprensión de los impactos en la salud de los diferentes tipos de azúcares puede cambiar, lo que requiere ajustes en las definiciones. 3. Rigor científico: Garantizar que la definición se base en evidencia científica sólida. Considere las últimas investigaciones sobre los efectos fisiológicos de los diferentes azúcares y los métodos analíticos disponibles para distinguir con precisión entre los azúcares añadidos y	Peru

<p>los naturales.</p> <p>4. Armonización global: Apuntar a la armonización internacional para facilitar el comercio y crear coherencia en los requisitos de etiquetado. Colaborar con los países miembros para establecer puntos comunes y definiciones armonizadas que puedan adoptarse a nivel mundial.</p> <p>5. Practicidad para la implementación: Considere la viabilidad de implementar la definición en una amplia gama de productos alimenticios. Evaluar la disponibilidad y confiabilidad de métodos analíticos para medir azúcares añadidos y evaluar la practicidad para su uso en la industria alimentaria.</p> <p>6. Consistencia: Asegurar consistencia entre lo que se establezca como definición de azúcares añadidos y lo que actualmente se establece en la directriz CXG 23-1997 Directrices para el uso de declaraciones nutricionales y saludables.</p>	
<p>The definition of "added sugar" should encompass sugars and syrups deliberately added to foods during processing or preparation. It should exclude naturally occurring sugars in foods. The definition should be designed to distinguish sugars incorporated for flavor enhancement, preservation, or texture from those inherent in unprocessed or pre-processed ingredients.</p> <p>It is also important to set guidelines which provides parameters, methodology and reagents to be used in analyzing the "added sugars" content of food.</p>	Philippines
<p>It is a crucial to take into consideration the importance of developing and utilizing a standard analytical method to detect added sugar in products. As a result, it is advisable that Codex develop and publish a guideline on how to detect added sugars in food products (this matter can be referred CCMAS).</p>	Saudi Arabia
<p>To facilitate clarity in the definition, it would be helpful to also address the definition of other similar terms such as "free sugar".</p>	Singapore
<p>None</p>	South Africa
<p>Les spécialistes en nutrition doivent participer dans l'harmonisation de cette définition car au final l'objectif est d'informer le consommateur sur la source des sucres pour qu'il fasse un choix éclairé. Il y a une confusion avec les sucres libres, les sucres naturellement présents dans les aliments et les sucres totaux qu'il faudra prendre en considération.</p>	Tunisia
<p>Codex should take into consideration that several other discussions that pertain to updating definitions and/or labeling options for additional critical nutrients (e.g., added sugars, trans fatty acids, dietary fiber) have been ongoing and/or proposed. The United States is of the view that, should there be agreement to update these definitions and/or relevant nutrition labeling provisions, these could be undertaken as a single workstream in the relevant committees (i.e., CCFNSDU and CCFL, respectively), as opposed to approving and undertaking new work projects for each nutrient.</p>	USA
<p>Tomar como referencia definiciones ya aplicadas por los gobiernos. Ejemplo, USA (FDA): https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-declaration-added-sugars-honey-maple-syrup-other-single-ingredient-sugars-and, -Solicitar al Comité del Codex sobre Métodos de Análisis y Toma de Muestras (CCMAS) asesoramiento sobre la metodología para cuantificar los azúcares añadidos.-Valorar la posibilidad de que el CCFNSDU desarrolle un VRN-ENT para los azúcares añadidos.</p>	Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas (ALAIAB)
<p>Codex should carefully consider the following additional points:</p> <p>1) The introduction of a definition for "added sugars" and their declaration in the nutrient list might contribute to consumers' confusion and therefore be proven misleading.</p> <p>2) It should be noted that sugars content reduction in foods does not necessarily result in energy reduction, especially for certain starchy foods (e.g., breakfast cereals, biscuits etc.), and careful consideration of this issue is required before any definition or labelling of "added" sugars is recommended.</p>	CEFS

<p>3) Labelling of added sugars may encourage unhelpful reformulation practices where sugars are merely replaced with other caloric-dense ingredients having a similar nutritional impact (carbohydrates), bringing no calorie reduction and no nutritional benefits for consumers.</p>	
<p>Codex must also consider the impact and limitation of non-sugar sweeteners (NSS), these include acesulfame K, aspartame, advantame, cyclamates, neotame, saccharin, sucralose, stevia and stevia derivatives.</p> <p>The 2023 WHO Guidelines on the use of non-sugar sweeteners recommends that NSS not be used to manage weight or to reduce the risk of non-communicable diseases. Moreover the WHO report on the health impact of the use of NSS; report on the results of meta-analysis suggests that intake during pregnancy is associated with a very concerning 25% increase in the risk of premature birth, even after controlling for gestational age and leanness, and preeclampsia.</p> <p>The WHO also found that increased intakes of NSS is linked to increased body weight, type 2 diabetes, cardiovascular diseases and all-cause mortality in the general population.</p> <p>ENCA proposes that warnings of the risks described by the WHO be mandatory and the recommendation that they not be used for weight management to be prominently communicated on labels of products containing NSS.</p>	<p>ENCA</p>
<p>In addition to the above, ENSA would like to provide some additional sector-specific arguments against establishing a definition of added sugar. In the realm of plant-based food, it's crucial to acknowledge that plant-based foods frequently contain starch present in the raw, unprocessed ingredients. These natural starches are an intrinsic part of the plant and can be broken down to sugars during processing. However, starch is not intentionally added during the manufacturing process for sweetening purposes. It is essential to consider the effects of time and temperature during food processing. Certain sugars might be released unintentionally during procedures such as cooking or heating, even when not deliberately added for sweetening purposes. The same consideration applies to sugars undergoing chemical alterations, for example resulting from enzymatic reactions of breakdowns during the process, such as when producing plant-based drinks made of oats. Furthermore, it could mislead consumers into thinking that additional sugars were included during processing, when, in fact, they are inherent to the food ingredients. This kind of misinterpretation could discourage the consumption of plant-based drinks and could be very confusing for the consumer. Therefore, it is crucial to underscore that sugars which are formed during processing of plant-based foods should not be categorized as "added sugars" in any way, neither naturally occurring sugars in plant-based foods. Hence, sugar should remain labelled as total sugars which makes the definition of added sugar redundant. Given the sensitivity of this matter within the plant-based food sector, ENSA remains at your disposal for further inquiries.</p>	<p>ENSA</p>
<p>FIVS believes the definition of added sugars should focus on end levels of sugar in the final product in order to determine whether it falls under the the category of added sugars.</p>	<p>FIVS</p>
<p>Any definition for added sugars must clearly differentiate between naturally occurring and added sugars. As such, naturally occurring lactose in milk should be exempt from the definition in line with WHO recommendations.</p> <p>As noted above, guidance on documentation could prove helpful. Additionally, a review on the 'Non-addition of sugar' claim under the Codex Guidelines for the Use of Nutrition and Health Claims CXG 23-1997 would be suggested as a logical addition to this overall work.</p> <p>A technical specification must be developed that is sufficiently granular and clear on what is in scope and out of scope for 'added sugars', 'free sugars' and 'total sugars'. This specification must consider all sugar containing ingredients used in food & beverage manufacturing, with clear description of format, process, whether nutrients are retained, their usage, etc.</p> <p>We envisage several potential challenges in the implementation, which should be considered when developing the definition, e.g.</p> <ul style="list-style-type: none"> • Consumer understanding of 'added sugars' (or 'free sugars') • There may need to be changes in regulations in countries where a definition already exists. • For the food & beverage industry, implementation of an 'added sugars' (or 'free sugars') definition will likely have a significant impact (time, costs, resources). For example, systems will need to be created or adapted to capture which ingredients are classified as 'added sugars' 	<p>Food Industry Asia</p>

(or 'free sugars) and to determine their content in products. If 'added sugars' (or 'free sugars') must be presented on-pack, this will require artwork changes.	
It should be noted that sugars content reduction in foods does not necessarily result in energy reduction, especially for certain starchy foods and careful consideration of this issue is required before any definition or labelling of "added" sugars is recommended.	FoodDrinkEurope
ICBA considers guidance on ingredients that can be considered sources of added sugars would be helpful. The Guidelines for the Use of Nutrition and Health Claims CXG 23-1997 should be revisited to ensure 'no added sugars' claims are adequately covered or whether modifications may be necessary.	ICBA
IDF would like to reiterate that, in the case of approval of a new Codex work item on 'added sugars', given that there is no evidence connecting lactose with NCDs, consideration must be given to the fact that lactose naturally present in milk or dairy should not be covered by the term 'added sugars'. We would like to highlight that the purpose of having the definition for 'added sugar' should be clearly defined before starting the work. Furthermore, consumer understanding is crucial for differentiating between the definitions of 'total sugar', 'free sugar', and 'added sugar'. This aspect must be considered when developing the 'added sugar' definition	IDF/FIL
Differences amongst current systems around the world revolve around how to manage the use of ingredients when included in foods for sweetening purposes (e.g. honey, syrups, fruit juice concentrate, concentrated fruit purees etc.). Any definition should be clear, measurable, reproduceable and easy to calculate. If Codex considers modification of the WHO definition of 'free sugars' related to this topic, IFT would suggest that Codex exclude the list of foods (e.g., honey, etc.) from use. IFT Modified WHO Definition "Free sugars include monosaccharides and disaccharides added to foods and beverages by the manufacturer, cook or consumer and sugars naturally present."	IFT
Codex must also consider the impact and limitation of non-sugar sweeteners (NSS), these include acesulfame K, aspartame, advantame, cyclamates, neotame, saccharin, sucralose, stevia and stevia derivatives. The 2023 WHO Guidelines on the use of non-sugar sweeteners ⁸ recommends that NSS not be used to manage weight or to reduce the risk of non-communicable diseases. Moreover the WHO report on the health impact of the use of NSS ⁹ ; report on the results of meta-analysis suggests that intake during pregnancy is associated with a very concerning 25% increase in the risk of premature birth, , even after controlling for gestational age and leanness, and preeclampsia. The WHO also found that increased intakes of is linked to increased body weight, type 2 diabetes, cardiovascular diseases and all-cause mortality in the general population. IBFAN proposes that warnings of the risks described by the WHO be mandated and the recommendation that they not be used for weight management be prominently communicated on labels of products containing SSBs. References: 1. World Health Organization (2015) Guideline: sugars intake for adults and children. Geneva, World Health Organization. https://apps.who.int/iris/handle/10665/149782 . 2. Afshin, A., Sur, P.J., Fay, K.A., Cornaby, L., Ferrara, G., Salama, J.S. & et al (2019) Health effects of dietary risks in 195 countries, 1990–2017: a systematic analysis for the Global Burden of Disease Study 2017. The Lancet. 393 (10184), 1958–1972. doi:10.1016/S0140-6736(19)30041-8. 3. Nutrient and promotion profile model: supporting appropriate promotion of food products for infants and young children 6–36 months in the WHO European Region. Copenhagen: WHO Regional Office for Europe; 2022. Licence: CC BY-NC-SA 3.0 IGO. 4. [BJC1] Beauchamp GK, Mennella JA. Early flavor learning and its impact on later feeding behavior. J Pediatr Gastroenterol Nutr. 2009 Mar;48 Suppl 1:S25-30. doi: 10.1097/MPG.0b013e31819774a5. PMID: 19214055. Available at: https://journals.lww.com/jpgn/Fulltext/2009/03001/Early_Flavor_Learning_and_Its_Impact_on_Later.5.aspx . 5. WHO. Malnutrition: Key Facts Geneva: World Health Organization; 2023. Available at: https://www.who.int/news-room/fact-sheets/detail/malnutrition#:~:text=Malnutrition%2C%20in%20all%20its%20forms,while%2046%20million%20are%20underweight . 6. Castor, L.L. et al. Sugar-sweetened beverage intakes among adults between 1990 and 2018 in 185 countries. Nature Communications. 14: Article number 5957, 2023. 7. Global report on the use of sugar-sweetened beverage taxes, 2023. Geneva: World Health Organization; 2023.	International Baby Food Action Network

<p>Licence: CC BY-NC-SA 3.0 IGO. 8. World Health Organization (2023) Use of non-sugar sweeteners: WHO guideline. https://www.who.int/publications/i/item/9789240073616. Rios-Leyvraz M, Montez J. Health effects of the use of non-sugar sweeteners: a systematic review and meta analysis, Geneva: World Health Organization. 2022, Licence CCBY-NC-SA3.OIGO.[BJC1]This study is very inconclusive and purports to review a lot of studies.CLICK HERE TO ADD COMMENTS TO THIS QUESTION</p>	
<p>1) The definition should be completely aligned with the Codex Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997); and in particular: 7.1 Non-Addition of Sugars Claims regarding the non-addition of sugars to a food may be made provided the following conditions are met. (a) No sugars of any type have been added to the food (Examples: sucrose, glucose, honey, molasses, corn syrup, etc.); (b) The food contains no ingredients that contain sugars as an ingredient (Examples: jams, jellies, sweetened chocolate, sweetened fruit pieces, etc.); (c) The food contains no ingredients containing sugars that substitute for added sugars (Examples: non-reconstituted concentrated fruit juice, dried fruit paste, etc.); and (d) The sugars content of the food itself has not been increased above the amount contributed by the ingredients by some other means (Example: the use of enzymes to hydrolyse starches to release sugars). 2) Purpose: Clearly define the purpose for establishing a definition of added sugars. 3) Scientific basis: Ensure that the definitions are based on sound scientific evidence and take into account the latest understanding of scientific data such as a review of the scientific evidence related to ingredients on cariogenic potential, metabolism, caloric value, and glycaemic response, which may lead to excluding ingredients from the definition of added sugars, e.g., allulose. 4) Quantification of added sugars. CCFL has to work with CCMAS to develop other methods relating to the quantification of added sugars as additional information to support future implementation of the definition in the guidelines.</p>	<p>International Special Dietary Food Industries</p>
<p>No comments.</p>	<p>The Healthy Caribbean Coalition</p>
<p>The World Federation of Public Health Associations notes that one potential benefit of policies that target added sugars is that they can stimulate manufacturers to reformulate and reduce added sugars in the food supply. This kind of food systems response has potential to deliver population health benefits, even for those consumers who do not read labels. However, caution is needed to ensure that any reformulation is genuinely healthier, i.e. does not substitute one health-harming ingredient for another. In this light, WFPHA would note the rise of non-nutritive sweeteners in the food supply (see for example, https://pubmed.ncbi.nlm.nih.gov/34864247/). We also note recent work from WHO has issued recent evidence-informed guidance that does not recommend the use of non-sugar sweeteners for weight control (https://www.who.int/publications/i/item/9789240073616). As such, Codex may consider parallel policy measures (e.g. requirements to improve the visibility of the presence of non-sugar sweeteners on food labels) to support genuinely healthier reformation. This would also support the aim of informing consumers, given widespread recognition that consumers are interested in receiving this information.</p>	<p>World Federation of Public Health Associations</p>
<p>Codex must consider the impact and limitation of non-sugar sweeteners (NSS; including acesulfame K, aspartame, advantame, cyclamates, neotame, saccharin, sucralose, stevia and stevia derivatives). The 2023 WHO Guidelines on the use of non-sugar sweeteners recommends that NSS not be used to manage weight or to reduce the risk of non-communicable diseases. Moreover the WHO report on the health impact of the use of NSS ; report on the results of meta-analysis suggests that intake during pregnancy is associated with a very concerning 25% increase in the risk of premature birth, , even after controlling for gestational age and leanness, and preeclampsia. The WHO also found that increased intakes of is linked to increased body weight, type 2 diabetes, cardiovascular diseases and all-cause mortality in the general</p>	<p>World Public Health Nutrition Association</p>

population.WPHNA supports the proposal from IBFAN that warnings of the risks described by the WHO be mandated and the recommendation that they not be used for weight management be prominently communicated on labels of products containing SSBs.	
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