

## **P1058 – Nutrition labelling about added sugars Public Health & Consumer proposal for next steps 2023**

### **Confidential**

Please note this draft proposal has been developed for FSANZ employees working on P1058 only. It has been developed in good faith as a potential solution to obstacles in implementing added sugar labelling. As such, it should be treated in the strictest of confidence and not be distributed or discussed outside of the intended audience at FSANZ.

### **Key Messages**

- Single ingredient foods make up a very small proportion of the food supply.
- Complexities with the labelling of added sugars on single ingredient foods are a distinct sub-issue within the broader approach to the definition of added sugar. Discussions relating to these issues should not impede progress on added sugar labelling for the remainder of the food supply.
- We recommend deferring a decision on how to manage added sugar labelling for single ingredient foods will enable FSANZ to focus on added sugar labelling for all other packed foods.

### **Background- P1058**

- Currently, mandatory information on sugars is communicated to consumers in two ways: through the ingredients list, and by listing total sugars in the nutritional information panel (NIP).
- In 2017, the Food Ministers (then the Australian and New Zealand Ministerial Forum on Food Regulation) began looking at sugar labelling and regulatory options for improving information provided by manufacturers on labels with the intention to support Australians and New Zealanders with clearer information about added sugars in food and to enable them to make informed choices, beyond the currently provided information.
- In 2019, following FSANZ's review on nutrition labelling for added sugars, the Food Ministers noted that quantifying added sugars in the NIP best met the objective of providing adequate contextual information to enable consumers to make informed choices consistent with dietary guidelines recommendations i.e., "to limit intake of foods containing added sugars"
- Proposal P1058 is considering including 'added sugars' information in NIP to enable consumers to make informed choices in support of dietary guidelines.
- Following the targeted stakeholder consultation on P1058 in September 2022, FSANZ have delayed public consultation, previously planned for late 2022/early 2023.
- FSANZ now plan to take key issues to the FSANZ board for guidance in March 2023.
- Discussions with FSANZ have indicated that one of the key issues coming out of the targeted stakeholder consultations is how single ingredient foods should be labelled.
- FSANZ are open to solutions as to the way forward.

### **Single ingredient foods**

- There are ~2,900 single ingredient foods\* representing 10% of the ~29,000 products in the 2022 FoodSwitch dataset (data collected from all foods available for sale in Woolworths, Coles, Aldi, IGA and Harris Farm). This includes foods:
  - that contain 100% of a single ingredient only; or
  - that contain ~98-99% of a single ingredient and nominal amounts of other ingredients (i.e. preservatives, salt, citric acid, flavouring).
- After removing products with 0g total sugar and missing sugar information (e.g., plain water), a total of ~1600 single ingredient foods remained i.e. single ingredient foods that would be impacted by added sugar labelling only made up ~5.5% of the Australian food supply.

**Table 1.** Food categories that are considered single-ingredient foods

100% fruit juice*	Frozen vegetables	Herbs and spices	Seeds	Quinoa
Frozen fruit	Raw unflavoured meat	Oats, plain	Nuts, plain, unsalted	Couscous, plain
Dried fruit*	Raw unflavoured seafood	Sugar, plain*	Plain cooking oils	Plain rice
Dried legumes*	Dairy milk, plain	Honey, plain*	Fresh eggs	Other grains
Dried vegetables*	Plain water	Syrups, plain*		

\*Single-ingredient food categories that are likely to be most impacted by added sugar labelling reforms.

Data on single ingredient foods in the New Zealand food supply is currently being processed and will be provided once this is finalised.

### Recommendations

- Complexities with the labelling of added sugars on single ingredient foods are a distinct sub-issue within the broader approach to the definition of added sugar. Discussions relating to these issues should not impede progress on added sugar labelling for the remainder of the food supply.
- To enable FSANZ to focus on added sugar labelling for the broader food supply we recommend deferring a decision on how to manage added sugar labelling for single ingredient foods until after an added sugar definition is decided upon and the framework for implementation of added sugar labelling on all other packaged foods is finalised.

**NOTE:** This is **not** a deferral on the determination as to whether these ingredients are ‘added sugars’ for the purposes of the definition, just about how added sugar is represented on the label of single ingredient foods.

- Once this point has been reached, there should be a separate consultation on single ingredient foods to consider the best approach for added sugar labelling on these products.
- There needs to be a clear commitment that a decision on added sugar labelling on single ingredient foods will be made before the implementation period ends for putting added sugar on the label for all other foods so there is no significant lag in single ingredient foods updating food labels.
- Timing: there will be a phased implementation of added sugar on the NIP over a few years in any event so excluding single ingredient foods in the initial implementation phase will not add any further confusion for consumers.

For example:

- Year 1: added sugar definition and framework finalised
- Years 2-4: phased implementation of added sugar on the NIP on all packaged foods except single ingredient foods (during this period single ingredient foods would be required not to have an added sugar line in the NIP)
- Year 2: consultation and agreement on added sugar labelling for single ingredient foods
- Years 4-6: phased implementation of added sugar on the NIP for single ingredient foods
- A definition of single ingredient foods will need to be agreed upon to defer this piece of work. We recommend that only products that meet the following criteria are considered single ingredient foods for the purpose of the deferral:
  - Products that are at least 98% one single ingredient (this is to account for nominal amounts of other ingredients (i.e. preservatives, salt, citric acid, flavouring)) or are made up of at least 98% mixed single ingredients of the same nature (i.e. mixed nuts, mixed 100% juices);
  - Products that currently have a total sugar amount in the NIP i.e., excludes products such as plain unflavoured meat, water, oils.



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