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ICBA
INTERNATIONAL COUNCIL OF BEVERAGES ASSOCIATIONS

International Council of Beverages Associations Position
Nutrition Labeling of Sugars

Context

The International Council of Beverages Associations (ICBA) is an international nongovernmental organization that represents the interests of the worldwide nonalcoholic beverage industry. The members of ICBA operate in more than 200 countries and produce, distribute, and sell a variety of nonalcoholic beverages.

The ICBA and its members recognize the importance of providing meaningful and understandable fact-based nutrition information from which consumers can make informed dietary decisions.

ICBA members have a role, along with other food and beverage companies, to provide consumers with product nutrition information that motivates and empowers consumers to make sensible, balanced dietary choices, as part of an active, healthy lifestyle. In conjunction with robust consumer education programs, such information can be an effective tool to help consumers meet their individual nutritional needs.

The ICBA Position addresses the following key elements related to the nutrition labeling of sugars:

- **Total sugars:** Support for including total sugars as part of back-of-pack nutrition labeling.
- **Added Sugars**: Rationale against distinguishing, as part of nutrition labeling, between of added sugars and those sugars inherently present in a food or beverage product.
- **Consumer Education:** Support for educational initiatives to build consumers' awareness, understanding, and use of nutrition information.

With respect to the nutrition labeling of sugars:

1. ICBA supports labeling of total sugars as part of the back-of-package nutrient declaration on food and beverage labels.
2. ICBA does not support a distinction between sugars that are added to food and beverage products (also referred to as "free" sugars), and those that are inherently present in the same.
    a. The FAO/WHO Scientific Update on Carbohydrates in Human Nutrition[1] has stated that there is no convincing scientific justification for distinguishing between "free" and "other" sugars.
        i. The Report cites the absence of any practical and easily enforceable analytical method to distinguish between added and naturally-occurring sugars,
        ii. It confirms the well-known fact that the human body does not distinguish between added (free) sugars and naturally-occurring sugars,

[1] Joint FAO/WHO Scientific Update on Carbohydrates in Human Nutrition. European Journal of Clinical Nutrition, 61: S 1. December 2007.

iii. It concludes that such a distinction would not provide consumers with meaningful information as to the nutritional value or physiological influence of foods containing sugars,

iv. It states that the labeling of total sugars is "probably the most useful way to describe, measure, and label sugars." .

3. Rationale for the labeling of "total" vs. "added" sugars:

   a. There are many different types of sugars. They occur either as monosaccharides or disaccharides and are all part of the carbohydrate family.

   b. There is no scientific evidence that the body makes any physiological distinction between sugars that are added to foods and those that are naturally occurring. All sugars provide 4 kcal/g (17 kJ/g), whether they are naturally occurring in food and beverage products, or added to the same.

   c. Sugars that are added to food products cannot be readily distinguished from sugars that are naturally occurring in food products. Laboratory analysis for the presence of sugars yields a value for total sugars. This would make labeling enforcement for the declaration of added sugars difficult, if not impossible.

      i. A complex and expensive process involving isotope analysis is able to differentiate between sugars of different sources. The process was established to determine whether products such as fruit juice and wine had been adulterated. The results are qualitative, i.e., they can determine whether there is another sugar present. The results do not measure how much of the various sugars are present, and thus is inappropriate for quantitative analytical purposes.

   d. All sugars, whether added or natural occurring, provide energy. ICBA has concerns that labeling of "added sugars" would reinforce misperceptions that added sugars are more caloric or different in any way than sugars inherent in any food or beverages.

      i. All sugars, regardless of source, contribute the same amount of energy, i.e., 4 kcal/g (17 kJ/g).

      ii. Awareness of the total amount of energy provided by a food product (whether from sugars naturally occurring in foods or sugars that are added, as well as energy from other carbohydrates, protein, or fat) is essential so that consumers can choose foods that meet their dietary needs, while remaining within daily energy consumption requirements.

      iii. Listing of added sugars on a label would not, for many food products, give the consumer a true representation of the total sugar contribution of a food product.

      iv. Some foods, such as fruits, are inherently comprised principally of sugars (i.e., fructose). Listing of added sugar could distort the actual amount of sugar provided by a product (e.g., canned fruit provides sugars from the fruit, as well as sugars from syrup; a fruit yogurt provides sugar from milk, sugar from fruit, and sugar that is added for sweetness). ICBA has concerns that such an approach to labeling could mislead the consumer as to the actual amount of sugar that is being consumed.

4. Consumer Education

   a. Educational campaigns should be developed, with the goal of building consumers' awareness, understanding and use of nutrition information as a tool for making dietary choices that meet individual needs.

   b. ICBA and its members should engage with other stakeholders to develop such programs at the national, supranational and international levels.