



9th October 2023

CALL FOR SUBMISSIONS – PROPOSAL P1062 Defining added sugars for claims

This submission has been prepared by Abbott Nutrition. Abbott Nutrition believes that proper nutrition is the foundation for living the best life possible. Our aim is to make every stage of life a healthy one which is why we are dedicated to developing science-based nutrition products for people of all ages. Abbott Nutrition is committed to ethically marketing our products. Abbott Nutrition welcomes the opportunity to consider the issues and views proposed in this Proposal P1062 Defining added sugars for claims organized by FSANZ and the opportunity to comment.

Abbott Nutrition supports the definition proposed within the consultation. It is also clear from the consultation that harmonizing the interpretation and understanding around what are added sugars, the methods of calculation, the exclusions etc. is an essential step in order to ensure a fair application of claims requirements in relation to added sugars or unsweetened. It is also essential to emphasize that there is no analytical difference between an intrinsic carbohydrate and an added carbohydrate. Guidance for the industry is therefore essential.

These guidelines should cover the specific definitions of added sugars, what is considered “added” or excluded (e.g., inherent sugars) from such definition, the calculation methods, processes considerations and the information that Food Business Operators should keep and provide to justify their calculations. Without these elements, it will be impossible to control compliance as analytical methods cannot help in the distinction of added sugars vs. inherent sugars.

