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Submitted to P1062 - Defining added sugars for claims
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New Zealand Ministry for Primary Industries - New Zealand Food Safety

What is your position title?

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Are you the contact person for your organisation?

No

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Contact person's name:

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Have you read the P1062 – Defining added sugars for claims call for submission paper?

Yes

Confidential information

All submissions will be published, including redacted versions of confidential submissions. We will not publish material that we accept as confidential. Does your submission contain confidential information?

No. My submission does not contain confidential information.

Proposed changes to 'no added sugar(s)' claim conditions

1 FSANZ proposes to continue to set 'no added sugar(s)' claim conditions based on the addition of ingredients to foods (see section 5.2 of the Call for submissions document).

Do you have any comments on this approach?:

We are happy with setting “no added sugar(s)” claim conditions based on the addition of ingredients to foods when coupled with the requirement that foods also containing the fruit products listed in Q5 (and (a)(ii—viii) of the entry “sugar or sugars” in draft S4—3), are ineligible for “no added sugars” claims. Further we consider that all of these sugars and high sugar fruit products, even when sold as single ingredient foods, should not be eligible to make “no added sugar” claims. Making such a claim on any food high in concentrated sugar is at best confusing and at worst misleading for consumers. This approach is consistent with the findings of the consumer evidence summary, which indicates that ‘no added sugar’ claims increase the perceived healthfulness of food products for consumers. The nature of these products can still be described to consumers using other claims, such as “100% fruit juice”.

2 FSANZ proposes a food displaying a ‘no added sugar(s)’ claim must not contain an ‘added sugars’ as an added ingredient including an ingredient of a compound ingredient. FSANZ proposes defining 'added sugars' for this claim condition (see section 5.2.1.4 of the Call for submissions document).

Do you have any comments on this approach or the defined added sugars (see below)?:

NZFS requests the following changes to the definition:

1. First bullet point currently reads: “hexose monosaccharides and disaccharides.”

NZFS proposes for first bullet point: “hexose monosaccharides and disaccharides (including low energy hexose monosaccharides and disaccharides, such as D-tagatose).”

2. Second bullet point currently reads: “starch hydrolysate.”

NZFS proposes for second bullet point: “starch hydrolysate, maltodextrin and similar products (including dextrans, oligosaccharides and cyclodextrins).”

3. 11th bullet point currently reads: “concentrated fruit juice, unless the food for sale is fruit juice.”

NZFS proposes for 11th bullet point: “fruit juice, including concentrated fruit juice and unconcentrated fruit juice.”

Explanatory notes:

1. NZFS considers the need to be as clear and explicit as possible in defining “added sugars” for the purpose of “no added sugar(s)” claim conditions. For that reason we think it would be helpful to point out in the definition that hexose monosaccharides and disaccharides could include some low energy sugars such as D-tagatose (and potentially others in the future).

2. Including phrases like “and similar products” has caused confusion with food manufacturers and enforcers in the past, so we would request FSANZ to clarify what products would be considered similar to glucose syrups and maltodextrin. NZFS suggests that starch hydrolysates should sit in the same bullet point as “maltodextrin and similar products” and has suggested other commonly used “similar products” to include as examples above. However as there is a large spectrum of starch hydrolysates, ranging from almost starch to glucose, consideration could be given to an appropriate cut off point. All are broken down to glucose quickly in the body, and none would be recommended by the dietary guidelines which are focused on mainly obtaining carbohydrates from unrefined sources.

3. And finally, we consider all fruit juices to be high in sugar – whether they are concentrated, deionised or unconcentrated fruit juices. Allowing fruit juices to make “no added sugars” claims when they are the food for sale (as single ingredient foods) is misleading given their inherently high sugar content. There are also other claims that can be made on such products to convey their origin (eg “made with 100% fresh fruit” or comparative claims such as “20% less sugar than x juice” or “source of vitamin C”. For the same reason we believe that any type of fruit juice should be included in the definition above.

All other single ingredient foods that are included within the “added sugars” definition or the list of fruit products specified in (a)(ii—viii) of the draft S4—3 are high in sugar (eg, sugar syrups, honey and icing sugar). We consider that any food specified in the “added sugars” definition should also be ineligible to make “no added sugar” claims when sold as a single ingredient food, because of their high concentrated sugar content.

NZFS acknowledge that dietary guidelines recommend if fruit juices are consumed that they should be diluted with water. As such there are products in the market that are 50:50 blends of juice with water. If juice is included in the definition above, such products would not be able to make “no added sugars” claims, however they would still be able to make comparative claims (eg 50% less sugar than fruit juice”, which is arguably more useful for consumers).

3 FSANZ proposes ‘no added sugar(s)’ and ‘unsweetened’ claims are not permitted on foods containing the hexose monosaccharide D-tagatose, as an ingredient, consistent with existing claim conditions in the Code. As D-tagatose is a hexose monosaccharide, it is captured in the definition of ‘added sugars’ (see section 5.2.2 of the Call for submissions document).

Do you have any comments on this approach?:

Agreed – though this should be explicit in the definition.

NZFS considers the need to be as clear and explicit as possible in the definition of “added sugars”. For that reason we think it would be helpful to point out in the definition that hexose monosaccharides and disaccharides could include some low energy sugars such as D-tagatose (and potentially others in the future).

4 FSANZ proposes foods containing low energy sugars (mono- and disaccharides), as ingredients, listed in subsection S11—2(3) of Schedule 11 not be permitted to display ‘unsweetened’ claims (see section 5.2.2 of the Call for submissions document).

Do you have any comments on this approach?:

Agreed – though this should be explicit in the definition (as suggested in the response to question 3).

5 FSANZ proposes a food displaying a ‘no added sugar(s)’ claim must not contain the fruit products listed below as an added ingredient (including as an ingredient of a compound ingredient). FSANZ proposes to exempt fruit products which are lemon or lime fruit (see section 5.3 of the Call for submissions document).

Do you have any comments on this approach or the fruit products listed?:

NZFS agrees that the proposed approach is a pragmatic one, that is reasonably well supported by the evidence underpinning “free sugars” and “liberated sugars” as defined by the World Health Organisation.

With regard to FSANZ’s proposal to exempt fruit products which are lemon or lime fruit, NZFS agrees that these fruit products are not used to add sweetness to a food. However there may be other fruits not added for sweetening purposes (eg, yuzu, tamarillo). It would be more objective to specify (as for the products of hydrolysis) that any such fruit product cannot provide more than 1.5% sugars to the final food.

6 FSANZ proposes a fruit product which is the food for sale (e.g. fruit juice) be permitted to make a ‘no added sugar(s)’ claim. This includes when the food is sold as a singular fruit (e.g. apple juice) or a blend of different fruits (e.g. blend of fruit juices), providing the food contains no ‘added sugars’ or other products identified in claim conditions, as added ingredients. A blend or combination of different fruit products (e.g. fruit juice and fruit purée) will not be permitted to make the claim. FSANZ also proposes to clarify that fruit does not include legumes, fungi, herbs, nuts and spices for the purpose of the claim conditions (see section 5.3 of the Call for submissions document).

Do you have any comments on this approach?:

NZFS considers all of the fruit products in the lists (a)(ii to viii) and (c)(i—xii) to be high in concentrated sugars, and therefore they should not be eligible to make “no added sugar(s)” claims. This includes canned fruit in juice (recognising that deionised juice is often used in such products).

The dietary guidelines for both Australia and New Zealand recommend that fruit juice intake be limited due to its sugar content. So what is listed in the NIP to describe such sugars (P1058) must take account of this. The NZFS preference therefore, is that they should not be able to make “no added sugars” claims.

NZFS also notes emphasis on the ‘health halo effect’ of “no added sugar(s)” claims which is highlighted in the FSANZ consumer evidence summary. The research shows that these claims disproportionately mislead some population groups: in particular, low income, less educated and minority groups. Allowing these single ingredient foods that are high in concentrated sugars and recommended to be limited by the Dietary Guidelines to make “no added sugar(s)” claims is therefore likely to mislead consumers, and possibly result in inequitable health outcomes.

NZFS have also received advice from New Zealand Commerce Commission staff that claims can be literally true but still be considered misleading. What needs to be assessed is the overall impression that is provided to the audience – for example, when literally no sugar is added (so the claim is factually correct) this could create an overall misleading impression in all the circumstances when the food is inherently high in sugars. As discussed above, NZFS notes the FSANZ consumer evidence summary indicates that this could well be the case – especially in more disadvantaged groups already experiencing health inequity.

NZFS considers an exception could be made for 100% pureed infant foods manufactured to meet Standard 2.9.2, especially for infants under eight months, though more work is required before finalising claim conditions. Since it is recommended that first foods be pureed for ease of swallowing, the presence of fruit puree in such foods (whether they be 100% fruit puree, or part fruit puree, part vegetable puree and part meat puree), may not be considered an “added sugar”. If there is permission for “no added sugar” claims for infant foods made from pureed fruit, such permission should also apply to purees made from fruits and vegetables and/or meat. This is to promote consistency and avoid disadvantaging purees containing vegetables. More work is needed to assess this area, specifically quantifying the amount of sugars fruit purees added to the overall diets of infants from first foods. NZFS is currently undertaking research in this field. More information about this research is provided in answer to Q13.

It is proposed to clarify that fruit does not include legumes, fungi, herbs, nuts, spices or seeds. NZFS notes that in Standard 1.2.7 and Standard 1.2.8 the definition for fruit does not include nuts, spices, herbs, fungi, dried legumes (including dried legumes that have been cooked or rehydrated) and seeds. Is condition (i) required when this point is already included in the definition for fruit in Standard 1.2.7 and Standard 1.2.8? NZFS also notes that Schedule 22 defines fruits, which is consistent with the proposed exclusions (legumes, fungi, herbs, nuts and spices), but clarifies that fruiting vegetables (eg tomatoes) are also excluded.

7 FSANZ proposes ‘no added sugar(s)’ claims are not permitted when the concentration of sugars in the food is increased from the hydrolysis of carbohydrates during food manufacture, except when the sugars concentration in cereal-based plant milks made using hydrolysis is $\leq 1.5\%$ (and the product otherwise meets claim conditions) (see section 5.3.2 of the Calls for submissions document).

Do you have any comments on this approach?:

NZFS agrees that the proposed approach is a pragmatic one, though questions why the $\leq 1.5\%$ threshold should apply only to cereal-based milks. This could be a useful technology to employ in other categories and future food categories, so could a threshold of sugars concentration from the hydrolysis of carbohydrates during food manufacture of $\leq 1.5\%$ (when the product otherwise meets claim conditions), apply to all foods?

8 FSANZ proposes to maintain the existing condition that a food displaying an 'unsweetened' claim must meet the conditions for a 'no added sugar(s)' claim, noting that the amended 'no added sugar(s)' claim conditions will apply (see section 5.4 of the Call for submissions document).

Do you have any comments on this approach?:

NZFS agrees that the existing conditions for making an "unsweetened" claim should continue to include the conditions for "no added sugars" claims, noting these have been amended. NZFS notes that it could be useful to add a definition of "intense sweeteners" (as food additives) to Standard 1.1.2. So that would result in the existing condition list having an asterisk beside intense sweeteners: "intense sweeteners*, ...".

9 FSANZ proposes to maintain the existing condition for intense sweeteners, sorbitol, mannitol, glycerol, xylitol, isomalt, maltitol syrup or lactitol. FSANZ proposes a food containing low energy sugars (mono- and disaccharides) listed in subsection S11—2(3) of schedule 11, as an ingredient (including an ingredient of a compound ingredient), not be permitted to display an 'unsweetened' claim (see section 5.4 of the Call for submissions document).

Do you have any comments on this approach?:

NZFS notes that it could be useful to add a definition of "intense sweeteners" (as food additives) to Standard 1.1.2 and add erythritol to the list of sugar alcohols. So that would result in the existing condition list looking as follows: "intense sweeteners*, sorbitol, mannitol, glycerol, xylitol, isomalt, maltitol syrup, erythritol or lactitol".

Consideration should also be given as to how future food additive applications might affect this list.

10 FSANZ is proposing a two-year transition period to allow producers, manufacturers and importers time to make any required labelling changes for products carrying 'no added sugar(s)' or 'unsweetened' claims to comply with the new claim conditions (see section 7 of the Call for submissions document).

Do you have any comments on this approach?:

NZFS suggests the transition period need to align with P1058, as that will affect all products, rather than just those voluntarily making claims. There seems little merit in having separate transition periods as these two proposals are so closely related.

Data and evidence

11 Do you have any data or are you aware of published data on the number of products with 'no added sugar(s)' or 'unsweetened' claims in Australia and/or New Zealand (see data used for this proposal at section 3.1 of the Call for submissions document)?

Yes

If yes, please upload your file here.:

NZFS Data for P1062 submission Q11.xlsx was uploaded

12 Do you have any evidence or are you aware of published literature on consumer understanding of and responses to 'no added sugar(s)' or 'unsweetened' claims on food products (see evidence used for this proposal at section 3.2 of the Call for submissions report and Supporting Document 1)?

No

If yes, please upload your file here.:

No file uploaded

13 Do you have any data or know of any published data on the costs of labelling changes per stock keeping unit or package type (see data used for this proposal at Attachment E to the Call for submissions document)?

No

If yes, please upload your file here:

No file uploaded

Additional comments

Comments and other input

Additional comments and input:

Five further NZFS concerns and explanatory text are outlined here:

1. Interface with P1058 and single ingredient foods

NZFS has concerns about how this work will inform what will be listed in the NIP for sugars in P1058. We do not think the term "added sugars" is the best descriptor of what should be listed in the NIP when referring to the types of sugars that should be limited according to the dietary guidelines. Partly this will be determined by how we manage single ingredient foods. If our understanding is correct, this call for submissions proposes to allow certain high sugar single ingredient foods to make "no added sugars" claims if the food for sale is fruit juice, honey, golden syrup, fruit puree, etc. NZFS do not agree

with this proposal due to these single ingredient foods being naturally high in concentrated sugars and not recommended by the dietary guidelines as every day foods. We are interested to see how the status of the agreed definition of “added sugars” for making “no added sugars” claims will affect P1058, as the two concepts are not equivalent and all of the high sugar single ingredient foods identified in the current CFS are recommended to be limited (in some way) by the dietary guidelines due to them being more concentrated forms of sugar than what occurs naturally in plants. In addition, Standard 1.2.8—6(1)(d)(iv) requires the subject of any Nutrition Content Claims to be listed in the Nutrition Information Panel. So for foods making “no added sugar(s)” claims, is a NIP entry for “Added sugars” 0g required? This is the case for “Gluten Free” claims.

2. The rise of “No refined sugars” claims

NZFS is concerned with the rise in use of “No refined sugars” and similar claims (eg, “no added white sugar”, “no added refined sugar”). We commonly see these claims being made as a result of foods being unable to make “no added sugars” claims due to the presence of date puree or agave syrup (for example). Given these foods are also added sugars and recommended to be limited in the diet, we see “no refined sugars” claims as being misleading for consumers. With a wider range of foods being ineligible from making “no added sugar” claims, we can see the use of “no refined sugar” claims increasing even more in popularity. Therefore P1062 could be an opportunity to also address “no refined sugars” claims, by prohibiting or providing restrictions to these (and similar claims about any type of sugars) on the grounds that they are misleading to consumers by creating a false ‘health halo’ effect, especially in foods that are high in sugars. NZFS understand that the Code does allow synonyms of claims, however we do not consider “no refined sugars” to be a synonym of “no added sugars”, because the definition for “no added sugars” includes both refined and unrefined sugars. “No added white sugars” might be a logical synonym of “no refined sugars” though white sugar is also a subset of refined sugars. Perhaps an option to address this would be to consider prohibiting the use of other descriptors of sugar when making “no added sugars” claims (ie, making the claim “no added sugars” prescribed wording?) And/or developing specific conditions for “no refined sugars” claims, based on the final sugars content of the food.

The data provided by NZFS in answer to Q11 is extracted from the GS1 NZ data on the total number of products making “no added sugar(s)” claims, which is much higher than the numbers FSANZ summarised in section 3.1.2. The total number of products making a “no added sugar(s)” claim was 1165 in New Zealand, while 32 made an “unsweetened” claim. In addition to this 216 made a “no refined sugar” claim – which is a claim that seems to be increasing in use.

We have provided the raw data on the use of these claims in New Zealand, and even though this is subject to error as these claims (and synonyms of them) may not have all been captured in the GS1-NZ database, it does provide some indication that “no refined sugars” claims are actually more problematic than “no added sugars” and “unsweetened” claims. Conditions for “no refined sugars” claims (or synonyms of them) are not provided in Schedule 4. Of the 216 “no added refined sugar” claims, 111 of them were on foods with a sugar content of over 20g/100g, indicating reasonably high sugar content. NZFS therefore request conditions to be added for “no refined sugar” claims – potentially preventing foods high in sugar from making such claims due to their misleading nature. Of the 1165 products making “no added sugars” claims, 158 were on products with greater than 20g/100g sugar. By contrast only one product making an unsweetened claim had a total sugar content greater than 20g/100g. The food categories of most concern – where high sugar content foods are making “no refined sugars” and “no added sugars” claims are as follows:

- Fruit/nut seed mixes
- Canned fruits
- Sugar/syrups/sugar substitute products
- Chocolate confectionary
- Sauces/dressings
- Baking mixes/supplies
- Snacks (chips/snack mixes, popcorn)
- Honeys/jams/marmalades
- Non alcoholic beverages (flavoured, not ready to drink) (but not fruit juices)
- Cereal bars/muesli bars

3. Concerns that misleading claims could increase health inequities

NZFS also notes the importance of this work to address health inequities, since the consumer research shows the population groups most likely to be misled by “no added sugars”, “unsweetened” and potentially “no refined sugars” claims are lower income and education groups and those with non-European ethnicity. While food labels alone cannot address inequity issues, this is one area where we are able to help reduce areas of confusion and misleading information that may have more disproportionate negative health outcomes in some communities.

NZFS have also received advice from New Zealand Commerce Commission staff that claims can be literally true but still be considered misleading. What needs to be assessed is the overall impression that is provided to the audience – for example, when literally no sugar is added (so the claim is factually correct) this could create an overall misleading impression in all the circumstances when the food is high in sugars anyway. NZFS notes the FSANZ consumer evidence summary indicates that this could well be the case – especially in minority groups.

4. More consideration is required for Infant foods and “no added sugar(s)” claims

As discussed in the answer to Q6, NZFS consider that fruit purees used in wet pureed weaning foods, specifically for infant under eight months of age, may need special consideration with regards to “no added sugars” claims due to the processing being required for safety reasons in this age group. Further research into what the contribution of sugars from these sources have in the diets of infants should be considered.

NZFS has commissioned the University of Otago to analyse the First Foods NZ and Young Foods NZ studies to determine the contribution of baby food pouches and other commercial infant foods to nutrient intake from complementary foods in infants, toddlers and preschool-aged children. This research should be completed in November 2023, and could be used to inform a decision on the relevance of “no added sugar(s)” claims regarding foods for infants.

As part of this work the team will determine the contribution of total sugars, free sugars and added sugars to dietary intakes the survey participants of older infants aged 6-12 months (n=645), toddlers aged 12-23.9 months (n=108) and preschool-aged children aged 24-47.9 months (n=181). The analysis will look into the form of the foods and will be able to provide some information on ‘wet infant foods’ (e.g pouches and cans) and snack foods that are marketed to infants and young children. The following definitions will be used:

Existing FOODfiles values for “free sugars” and “added sugars” have been used whenever they are available. The main area of missing values was the commercial foods that were not in FOODfiles (including all commercial infant foods). Recipes for these foods were developed by the research team. The approach used for generating “free sugars” and “added sugars” values for these foods was:

1. In general, values were aligned with the methods used to assign “free sugars” and “added sugars” values in FOODfiles 2018 foods (i.e. the Kibblewhite

et al. (2017) method).

2. "Free sugars" = as per FOODfiles 2018 approach, except that for commercial infant foods:

o Purees: Kibblewhite et al. (2017) consider sugars in purees to be free sugars – but the method is based on adult diets in which purees are usually used for sweetening. In contrast, pureeing of food for babies is to make it safe to eat from a textural point of view. For this reason:

- home-made pureed and commercial pureed foods (e.g., an apple home-made puree or apple baby food pouch) were not considered to contain "free sugars".

- however, if the pureed ingredient was part of a non-pureed food (e.g., biscotti baby snacks) then the sugars were considered to be "free sugars" (in line with the Kibblewhite et al. (2017) method).

3. "Added sugars" = as per FOODfiles 2018 approach, except that for commercial infant foods:

o Fruit juice concentrate: Kibblewhite et al. (2017) only consider that these contribute "added sugars" if they are not diluted back to the concentration of fruit juice, therefore:

- because wet commercial infant foods usually have water as an ingredient, it is not possible to determine the level of dilution of the concentrate, so these sugars were not considered to be "added sugars".

- However, for commercial infant foods that are dry in their eaten form, the sugars were considered to be "added sugars".

Reference

Kibblewhite, R., Nettleton, A., McLean, R., Haszard, J. J., Fleming, E. A., Kruimer, D., & Morenga, L. T. (2017). Estimating Free and Added Sugar Intakes in New Zealand. *Nutrients*, 9(12), 1292. <https://doi.org/10.3390/nu9121292>

5. Should alcoholic beverages be eligible to make "no added sugars" claims?

In light of P1049 NZFS considers alcoholic beverages should be unable to make nutrition content claims about sugars. This includes "no added sugar(s)" claims.

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Feedback

What is your level of satisfaction with using this platform to complete your submission?

Unsatisfied

Do you have any feedback you would like to provide to FSANZ regarding this new platform?

Yes

If yes, please provide details.:

"Unsatisfied" is probably a bit harsh, but it's more accurate than "satisfied". It's just inconvenient because it adds an extra layer of work for us, as we still need to draft a normal submission for internal sign off purposes. Then, when you cut and paste text into the platform text boxes, all of the formatting is removed, with no ability to add it back in. That makes it difficult to emphasise text, suggest edits to original proposed text or show information in a tabular or diagrammatic format. Often a table or diagram is a more user-friendly way of describing something. If it is not possible to allow formatting of the text, it would therefore be useful to allow file uploads for each question - not just for specific questions.

Food category	Numbers making "no added sugars" claim	Average Sugars Per 100g	Numbers making "unsweetened" claim	Average sugars per 100g	Numbers making "no refined sugar" claim	Average sugars per 100g
Fruits/Vegetables/Nuts/Seeds Prepared/Processed	155	23	2	23	37	29
Nuts/Seeds - Prepared/Processed	28	5				
Nuts/Seeds - Prepared/Processed (Out of Shell)	7	3			1	40
Nuts/Seeds - Prepared/Processed (Shelf Stable)	21	6	1	3	3	8
Fruit/Nuts/Seeds Combination	7	38				
Fruit/Nuts/Seeds Mixes - Prepared/Processed (Shelf Stable)	7	38	1	42	24	30
Fruit - Prepared/Processed	95	32				
Fruit - Prepared/Processed (Frozen)	20	8			2	7
Fruit - Prepared/Processed (Shelf Stable)	75	38			7	39
Vegetables - Prepared/Processed	25	5				
Vegetables - Prepared/Processed (Frozen)	1	2				
Vegetables - Prepared/Processed (Perishable)	1	0				
Vegetables - Prepared/Processed (Shelf Stable)	23	5				
Fish and Seafood	1	3				
Fish - Prepared/Processed	1	3				
Fish - Prepared/Processed (Perishable)	1	3				
Seafood	3	0				
Fish - Prepared/Processed	3	0				
Fish - Prepared/Processed (Perishable)	3	0				
Milk/Butter/Cream/Yogurts/Cheese/Eggs/Substitutes	101	7	22	4	29	6
Milk/Milk Substitutes	38	3				
Milk (Perishable)	7	6	1	4		
Milk (Shelf Stable)	12	2	10	2		
Milk Substitutes (Shelf Stable)	19	2	2	2	1	5
Cheese/Cheese Substitutes	2	0				
Cheese (Perishable)	1	0			1	14
Cheese Substitutes (Perishable)	1	0				
Butter/Butter Substitutes	1	2				
Mixed Fat Spreads (Perishable)	1	2			1	18
Yogurt/Yogurt Substitutes	60	9				
Yogurt (Perishable)	53	8	3	6	17	5
Yogurt (Shelf Stable)	5	25	4	6		
Yogurt Substitutes (Perishable)	2	3	2	2	9	3
Confectionery/Sugar Sweetening Products	50	12			13	38
Sugars/Sugar Substitute Products	8	26				
Sugar/Sugar Substitutes (Shelf Stable)	3	0			1	88
Syrup/Treacle/Molasses (Shelf Stable)	5	35			2	55
Confectionery Products	42	11				
Chocolate and Chocolate/Sugar Candy Combinations - Confectionery	39	12			10	30
Sugar Candy/Sugar Candy Substitutes Confectionery	3	2				
Seasonings/Preservatives/Extracts	92	8			17	21
Herbs/Spices/Extracts	21	7				
Herbs/Spices (Shelf Stable)	15	10				
Stock/Bones (Shelf Stable)	4	1				

Extracts/Seasonings/Flavour Enhancers (Shelf Stable)	2	4				
Vinegars/Cooking Wines	1					
Vinegars	1					
Sauces/Spreads/Dips/Condiments	67	8				
Sauces - Cooking (Perishable)	1	3				
Sauces - Cooking (Shelf Stable)	26	8			8	23
Dressings/Dips (Perishable)	1	2				
Dressings/Dips (Shelf Stable)	5	12			5	22
Other Sauces Dipping/Condiments/Savoury Toppings/Savoury Spreads/Marinades (Shelf Stable)	26	9			4	17
Other Sauces Dipping/Condiments/Savoury Toppings/Savoury Spreads/Marinades (Frozen)	2	4				
Mayonnaise/Mayonnaise Substitutes (Perishable)	1	2				
Mayonnaise/Mayonnaise Substitutes (Shelf Stable)	2	1				
Tomato Ketchup/Ketchup Substitutes (Shelf Stable)	3	14				
Pickles/Relishes/Chutneys/Olives	3	1				
Chutneys/Relishes (Shelf Stable)	1	2				
Pickled Vegetables	2	1				
Bread/Bakery Products	101	3	2	3	34	19
Baking/Cooking Mixes/Supplies	13	4				
Baking/Cooking Mixes (Shelf Stable)	10	2			8	22
Baking/Cooking Supplies (Shelf Stable)	3	10	2	3	4	33
Bread	32	3				
Bread (Perishable)	23	3				
Bread (Shelf Stable)	9	4				
Sweet Bakery Products	5	2				
Cakes - Sweet (Shelf Stable)	4	2			4	15
Pies/Pastries - Sweet (Frozen)	1	1				
Biscuits/Cookies	50	3				
Biscuits/Cookies (Shelf Stable)	50	3			18	16
Savoury Bakery Products	1	3				
Pies/Pastries/Pizzas/Quiches - Savoury (Perishable)	1	3				
Prepared/Preserved Foods	161	12	2	7	29	26
Prepared Soups	16	2				
Soups - Prepared (Perishable)	16	2				
Snacks	24	22				
Chips/Crisps/Snack Mixes - Natural/Extruded (Shelf Stable)	18	24			6	29
Popcorn (Shelf Stable)	3	1			2	20
Salt Sticks / Mini Pretzels	1	2				
Snacks Other	2	51			10	15
Desserts/Dessert Sauces/Toppings	17	10				
Dessert Sauces/Toppings/Fillings (Shelf Stable)	1	0				
Desserts (Frozen)	1	33			1	2
Ice Cream/Ice Novelties (Frozen)	14	8				
Desserts (Shelf Stable)	1	20				
Sweet Spreads	9	55				
Honey (Shelf Stable)	4	64			1	11
Jams/Marmalades (Shelf Stable)	5	47			9	42
Baby/Infant - Foods/Beverages	89	7				
Baby/Infant - Specialised Foods (Shelf Stable)	82	7				
10000575: Baby/Infant - Formula (Shelf Stable)	7	7				
Vegetable Based Products / Meals	2	4				

Vegetable Based Products / Meals - Ready to Eat (Shelf Stable)	2	4				
Grain Based Products / Meals	1	1				
Grain Based Products / Meals - Not Ready to Eat - Savoury (Shelf Stable)	1	1				
Dough Based Products / Meals	2	3				
Dough Based Products / Meals - Ready to Eat - Savoury (Shelf Stable)	2	3				
Ready-Made Combination Meals	1	0				
Ready-Made Combination Meals - Ready to Eat (Perishable)	1	0				
Beverages	388	6	2	2	23	10
Coffee/Tea/Substitutes	22	1				
Coffee - Beans/Ground	1	4			1	4
Coffee - Ready to Drink	1	0			2	4
Tea - Bags/Loose	16	0			1	0
Tea - Instant	1	11				
Fruit Herbal Infusions - Instant	3	0				
Alcoholic Beverages (Includes De-Alcoholised Variants)	58	2				
Beer	41	1				
Apple/Pear Alcoholic Beverage - Sparkling	11	5				
Wine - Still	5					
Pre-mixed Drinks - Non-Alcoholic	1	0				
Non Alcoholic Beverages - Ready to Drink	271	7				
Dairy Based Drinks - Ready to Drink (Perishable)	11	5				
Dairy Based Drinks - Ready to Drink (Shelf Stable)	6	4	1	4		
Drinks Flavoured - Ready to Drink	43	4			2	8
Fruit Juice - Ready to Drink (Perishable)	77	10			3	8
Fruit Juice - Ready to Drink (Shelf Stable)	55	9				
Fruit Juice Drinks - Ready to Drink (Perishable)	14	9			1	9
Fruit Juice Drinks - Ready to Drink (Shelf Stable)	33	7			7	8
Packaged Water	12	1				
Sports Drinks - Rehydration (Ready To Drink)	1	2				
Stimulants/Energy Drinks - Ready to Drink	2	5			2	7
Vegetable Juice - Ready to Drink (Perishable)	2	7				
Vegetable Juice - Ready to Drink (Shelf Stable)	9	7				
Vegetable Juice Drinks - Ready to Drink (Shelf Stable)	2	7				
Dairy Substitute Based Drinks - Ready to Drink (Shelf Stable)	4	1				
Non Alcoholic Beverages - Not Ready to Drink	35	4				
Chocolate/Cocoa/Malt - Not Ready to Drink	3	4	1	0		
Drinks Flavoured - Not Ready to Drink	21	3			3	27
Fruit Juice Drinks - Not Ready to Drink (Shelf Stable)	4	4			1	5
Dairy Based Drinks - Not Ready to Drink (Shelf Stable)	7	8				
Tea and Infusions/Tisanes	2	4				
Tea - Bags/Loose	1	4				
Tea - Liquid/Ready to Drink	1	4				
Cereal/Grain/Pulse Products	84	17	1	8	32	22
Grains/Flour	5	4				
Flour - Cereal/Pulse (Shelf Stable)	1	0				
Grains/Cereal - Not Ready to Eat - (Shelf Stable)	2	1				
Grains/Cereal - Ready to Eat - (Shelf Stable)	2	10				
Processed Cereal Products	77	18				
Cereals Products - Ready to Eat (Shelf Stable)	27	6			9	12
Cereals Products - Not Ready to Eat (Shelf Stable)	9	2	1	8	2	11

Cereal/Muesli Bars	37	32			21	27
Protein Bars	4	5				
Cereal/Grain/Pulse Products Variety Packs	2	0				
Cereal/Grain/Pulse Products Variety Packs	2	0				
Meat/Poultry/Other Animals	8	0				
Meat/Poultry/Other Animals - Prepared/Processed	8	0			2	2
Beef - Prepared/Processed	3	1			2	2
Pork - Prepared/Processed	4	0				
Alternative Meat/Poultry/Other Animals Species - Prepared/Processed	1	0				
Fruits - Unprepared/Unprocessed (Frozen)	15	8				
Fruits - Unprepared/Unprocessed (Frozen)	15	8				
Fruit - Unprepared/Unprocessed (Frozen)	15	8				
Fruits - Unprepared/Unprocessed (Shelf Stable)	1	12				
Fruits - Unprepared/Unprocessed (Shelf Stable)	1	12				
Fruit - Unprepared/Unprocessed (Shelf Stable)	1	12				
Vegetables - Unprepared/Unprocessed (Shelf Stable)	5	3				
Vegetables - Unprepared/Unprocessed (Shelf Stable)	5	3				
Vegetables - Unprepared/Unprocessed (Shelf Stable)	5	3				
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Grand Total	1165	10	31	5	216	21

Summary analysis:

111 products making "no refined sugar" claims have a sugar content $\geq 20\%$
only 1 product making "unsweetened" claim has a sugar content $\geq 20\%$
158 products making "no added sugars" claims have a sugar content $\geq 20\%$

Main categories of concern:

- fruit/nut/seed mixes
- canned fruits
- sugar/syrups/sugar substitute products
- chocolate confectionary
- sauces/dressings
- baking mixes/supplies
- snacks (chips, snack mixes, pop corn)
- honeys/jams/marmalades
- non-alcoholic beverages (flavoured, not ready to drink)
- Cereal bars/meusli bars