Center for Science and Democracy at the Union of Concerned Scientists

FACT SHEET

Added Sugar on the Nutrition Facts Label

Public Comments to the FDA Show Big Food Is Sour on Science

HIGHLIGHTS

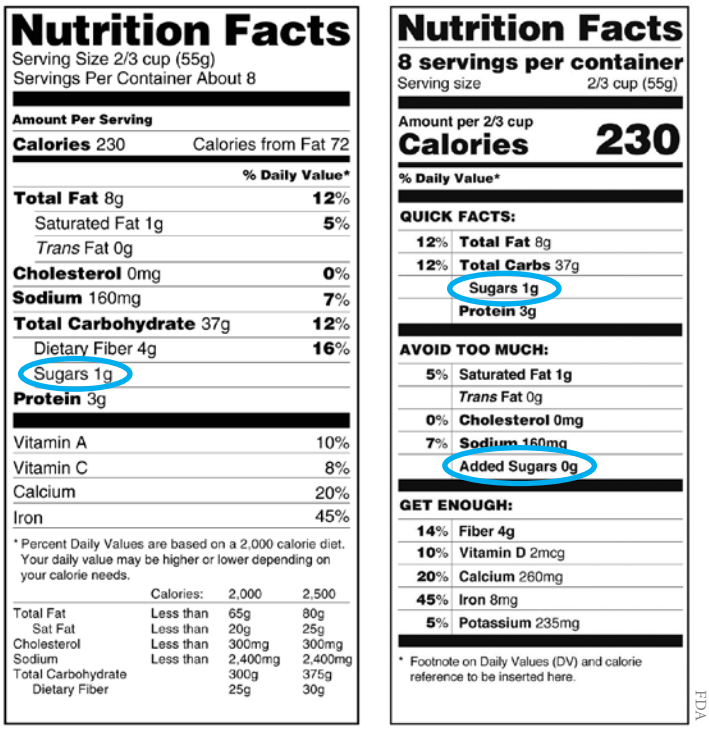
Scientific evidence increasingly shows a causal link between added sugar consumption and serious diseases, yet Americans are consuming two to three times what experts recommend. To help people make more informed decisions about what to eat and drink, the Food and Drug Administration (FDA) has proposed including a line for added sugars on the Nutrition Facts label on food packaging.

The majority of public comments the FDA received supported this proposed labeling change and came primarily from scientists and public health experts. Comments opposing the proposed label overwhelmingly came from the food industry. The FDA should resist food industry efforts to deny consumers access to this basic information about what's in their food and implement labeling based on the best available science.

In the more than two decades since the passage of the Nutrition Labeling and Education Act of 1990, the Nutrition Facts label has become an almost universally recognizable fixture on food packaging, providing valuable nutrition information to the public. In 2014, the U.S. Food and Drug Administration (FDA), acting on advances in nutrition science, proposed changes aimed at enhancing the label and improving Americans' access to information about what they are eating and feeding their families.

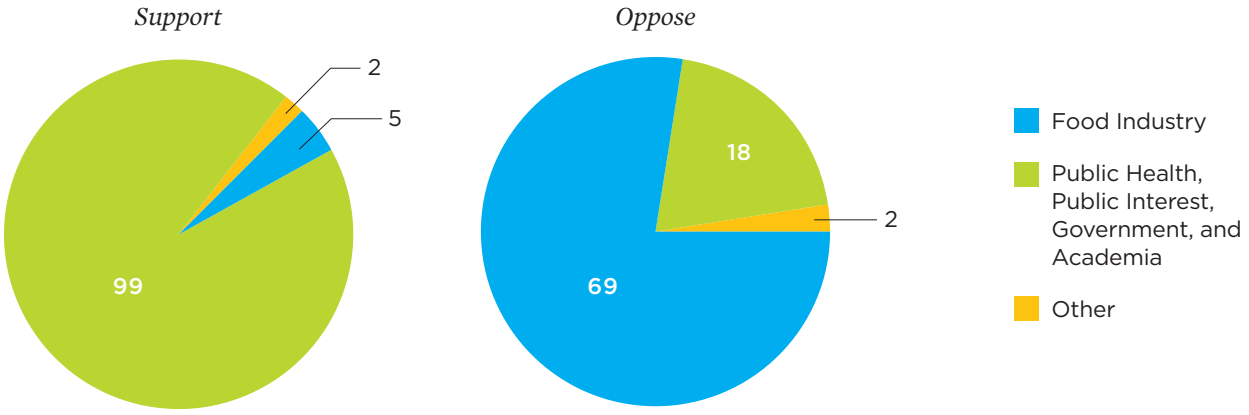
One change proposed by the FDA that has generated significant attention is the addition of a separate line for added sugars. This line would indicate how much of the product's total sugar had been added during manufacturing, as opposed to naturally occurring sugars. (The current and proposed labels are shown below.) As is customary of all federal government rule making, the proposed changes to the Nutrition Facts label were made available for public comment. The comment period for this rule was open from March 3, 2014, to August 1, 2014; a final rule is expected sometime in 2015 or 2016.

An analysis of comments submitted to the FDA illustrates the high stakes involved for public health advocates and the food industry in adding this single line to the Nutrition Facts label. The majority of public comments the FDA received supported the proposed change to label added sugar. A majority of these supporting



The current Nutrition Facts label, left, lists only "sugars," which include both added and naturally occurring sugars. The proposed new version, right, includes a separate line for "added sugars."

Public Comments on the FDA's Proposal to Include Added Sugars on the Nutrition Facts Label



Of the 215 unique comments on added sugar, that together represent 35,507 submissions on the topic to the FDA's public comment period, 106 comments were in support of the change (the majority from public interest and health groups), 89 were in opposition (mostly from the food industry), and only 20 took no stance on the topic.

comments came from scientists and public health experts, while a majority of comments opposing the label came from the food industry (see the figure above).

The Science on Added Sugars

Though not physiologically or metabolically different from naturally occurring sugars, added sugars are predominantly found in highly processed foods. Unlike fruits, vegetables, nuts, whole grains, and other nutrient-rich foods, processed foods typically do not promote satiety, even when fortified with vitamins and minerals, and can lead to increased consumption. Excessive sugar intake does not typically occur from eating too much fruit with naturally occurring sugars but rather from the consumption of sugar-sweetened beverages and processed foods that contain an abundance of added sugar.

Sugar consumption has long been known to cause tooth decay, and a growing body of scientific research now also finds evidence of a causal relationship between excessive sugar consumption and both weight gain and the rise in the incidence of major chronic metabolic diseases (e.g., type 2 diabetes, cardiovascular disease, high triglycerides, hypertension). Today, 25.8 million Americans are afflicted with type 2 diabetes, and 16 million suffer from heart disease. Overconsumption of sugar also has been linked to nonalcoholic fatty liver disease, which can lead to inflammation and scarring of the liver. Approximately 31 percent of adults and 13 percent of children have this condition, which can progress to nonalcoholic liver cirrhosis, a life-threatening condition that can require a liver transplant. Americans face the additional burden of rising health-care costs associated with treating these conditions.

Amending the Nutrition Facts label to list added sugars is supported by science-based guidance from leading health organizations including the American Academy of Pediatrics, American Heart Association, Institute of Medicine, and World Health Organization, all of which have advised limiting added sugar consumption.

Food Industry Opposition

Since an estimated 74 percent of packaged foods contain added sugars, bringing attention to added sugars is likely seen as a threat to the bottom line of many food industry entities, many of which opposed the FDA's proposed label change. Packaged food manufacturers (e.g., General Mills) and their trade associations (e.g., the Grocery Manufacturers Association) have

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The FDA's proposal to include a line for added sugar on the Nutrition Facts label on food packages will help people make more informed decisions about the food they purchase.

mounted an intense campaign to block the proposed change to the Nutrition Facts label. Instead of acknowledging the scientific evidence linking added sugars to health problems, food industry comments to the FDA opposing the added sugars label repeatedly attempt to cast aspersions on the science and manufacture doubt (see the table below). These actions undermine measures that would benefit public health.

Added Sugars and the 2015 Dietary Guidelines for Americans

In February 2015, the Dietary Guidelines Advisory Committee (DGAC) released a much-anticipated report outlining the latest scientific evidence for what Americans should be eating to stay healthy. The DGAC is an independent body of experts tasked with reviewing the research and making recommendations to the U.S. Department of Agriculture (USDA) and U.S. Department of Health and Human Services (DHHS) as these agencies develop the 2015 Dietary Guidelines for Americans.

When it came to added sugars, the DGAC found moderate to strong evidence for an association between high added sugar consumption—especially in the form of sugar-sweetened beverages—and tooth decay, obesity, type 2 diabetes, and heart disease. The report recommends limiting added sugars to 10 percent of daily calories (about six teaspoons for women and nine teaspoons for men)—far less than the

Select Food Industry Comments Denying the Science on Added Sugars

American Beverage Association	"FDA lacks a scientific rationale for providing information about added sugar content as distinguished from total sugar content . . . ." "[T]he proposed added sugars declaration is designed to convey the unsupported opinion that added sugars are somehow more adverse to health than sugars that occur naturally." "There is no scientific basis for an added sugars declaration."
Corn Refiners Association	"The 2014 proposed rule fails to provide scientific justification. . . . In fact, expert authorities and peer-reviewed research is still aligned in rejecting the notion that added sugars are causally linked to obesity and chronic disease."
General Mills	"We contend that FDA does not have adequate evidence regarding 'added sugars.'" "There is little to weak conclusive scientific evidence . . . relating the intake of added sugars in the general U.S. population to a chronic disease, condition, or health-related physiological endpoint beyond dental caries." "[S]cientific consensus groups have found difficulty in determining any relationship between added sugars intake and health outcomes."
Grocery Manufacturers Association	"By mandating the separate labeling of added sugars . . . FDA is strongly implying to consumers that added sugars are indeed distinct and different from (and less healthful than) inherent sugars, when they are not." "Because there is scant evidence to support the idea that added sugar contributes to ill health, providing this information in a nutrition label will not help aid consumers in maintaining a healthy diet." "Requiring producers that do not believe 'added sugars' are meaningful to maintaining healthy dietary practices to call out added sugars in a manner that strongly implies that avoiding added sugar is important to maintaining a healthy diet raises a serious risk to First Amendment values . . . ."
National Confectioners Association	"[T]here is inadequate scientific evidence linking 'added sugars' consumption to obesity, heart disease or any other chronic diseases."
Sugar Association	"[T]here is no validated body of evidence that can corroborate the popular theory that 'added sugars' reduce the nutrient adequacy of the American diet . . . ." "Scientific evidence does not support 'added sugars' intake contributes to obesity." "Americans are being misled by the statement they consume more 'added sugars' than recommended." "The reality is no authoritative scientific body after a thorough review of the scientific literature has set an upper intake level for total or 'added sugars.'" "The scientific evidence does not support a public health need to monitor 'added sugars' intake."

SOURCE: U.S. FOOD AND DRUG ADMINISTRATION 2014.

19.5 teaspoons per day (or 66 pounds per year) that the average American typically consumes.

The DGAC's report takes an even stronger position on listing added sugars on the Nutrition Facts label than the FDA's proposed rule. The DGAC recommends not only labeling added sugars on a line separate from total sugars but doing so in both grams and teaspoons (a teaspoon equals 4.2 grams), since teaspoons are easier to understand for most Americans, and listing the percent daily limit.

For decades, the food industry has influenced federal nutrition and agriculture policies, often to the detriment of public health. The strong response from the food industry to the FDA's proposed rule, and the misinformation about added sugars included in many of the industry's submitted comments, underscore the uphill battle agencies face in implementing science-informed policies. It is critical that the FDA, DHHS, and USDA resist attacks on the science, ignore misinformation from powerful industry interests, and heed the recommendations from leading scientists and nutrition experts. Addressing added sugars in the Nutrition Facts label and 2015 Dietary Guidelines for Americans would mean a real victory for public health.

Methodology

The data used for this analysis were the comments submitted to the FDA in response to its proposed changes to the Nutrition Facts label during the public comment period, March 3, 2014 to August 1, 2014. The FDA received a total of 287,874 comments, of which approximately 516 were unique; of these, 257 contained the word "sugar." Excluding from this subset duplicate comments and comments that did not actually mention "added sugar" at any point, 215 comments were included in the analysis, representing approximately 35,507 submissions on the topic of added sugar. Comments that casually mentioned added sugars in relation to an unrelated point were included but were not considered substantive. Opinions on added sugars were categorized as "support," "oppose," or "no stance"; the figure on p. 2 shows a detailed breakdown of these responses.

ACKNOWLEDGMENTS

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