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Comments on Docket No. FDA-2023-N-3849 “Virtual Public Meeting Strategies to Reduce Added Sugars Consumption in the United States from FDA CFSAN”

Dear Food and Drug Administration,

The Institute of Food Technologists (IFT) is thankful for the opportunity to provide comments on strategies to reduce added sugars consumption in the US. IFT is a global organization of approximately 12,000 members who are committed to advancing the science of food. We believe science is essential to ensure the global food system is equitable, sustainable, safe, and nutritious.

IFT commends the FDA for the efforts they have already undertaken to help American consumers reduce added sugars consumption, including establishing a regulatory definition for added sugars and including it on the Nutrition Facts label. We agree that additional efforts can be made to help Americans reduce intake of added sugars and we appreciate the FDA’s efforts to gather multi-stakeholder input prior to developing a strategy, including listening sessions and this comment period. Our comments focus on two key themes that came through in the listening sessions: labeling and reformulation of foods to reduce added sugars.

Labeling of Added Sugars

We agree that a standardized, science-based front of pack label could help some consumers identify healthy foods. Inclusion of added sugars as part of this label may provide additional assistance in helping consumers limit added sugar intake. As the primary reason for reducing added sugars is to meet food group and nutrient recommendations while staying within calorie needs¹, we agree that it would be helpful to include calorie information on the FOPL.

We also recommend that any labeling initiatives for added sugars be integrated into existing labeling initiatives already being considered by FDA, including front-of-package labeling initiatives (Docket No. FDA-2023-N-0155), the healthy definition, and the healthy icon. This will be critical to avoid consumer confusion and streamline future food reformulations undertaken by industry.

¹ U.S. Department of Agriculture and U.S. Department of Health and Human Services. Dietary Guidelines for Americans, 2020-2025. 9th Edition. December 2020. Available at DietaryGuidelines.gov.

Consumer research and testing on any labeling initiatives is recommended and should include all potential icons or labels that may be integrated on pack. This is necessary to evaluate how consumers react and understand multiple labeling schemes on pack and determine if multiple schemes create confusion. Testing should include real-world or simulation shopping environments to evaluate the ability of labels to change consumer behavior. Further investigations into actual consumption in the home would also be helpful. Research has shown there is often a considerable gap between consumer's purchase intention and actual purchasing and consumption behavior.^{2,3,4} This is likely due to multiple factors and trade-offs that consumers must consider when buying and consuming food, such as taste, brand, pricing, price promotions, product attributes, shelf display, sampling, and personal factors (e.g., reward, personal health needs). A review reported front-of package labeling increased the purchase of healthier foods, but the evidence was inconclusive as to actual improvements in healthy food consumption⁵, demonstrating the importance of these studies on behavior prior to large scale implementation of front-of-package labels.

Reformulation of Foods to Reduce Added Sugars

As noted by the FDA, there has been much progress made in reducing the consumption of added sugars. This has been partially driven by consumer awareness and behavior change, but also by reformulation of foods in the marketplace. To continue this progress we need technology and innovations that can enable sugar reduction while still achieving an acceptable and safe food product. One of these technologies is the use of low or no-calorie sweeteners. In the listening sessions, IFT was concerned to hear several stakeholders express apprehension over the use of low- and no-calorie sweeteners, despite considerable safety and efficacy data on these ingredients.^{6,7,8} As the FDA considers future strategies to reduce added sugar consumption, we encourage a focus on scientific evidence, particularly as it relates to low-and no-calorie sweeteners to achieve added sugar reduction.

² Castro, I.A.; Majmundar, A.; Williams, C.B.; Baquero, B. Customer Purchase Intentions and Choice in Food Retail Environments: A Scoping Review. *Int. J. Environ. Res. Public Health* 2018, 15, 2493. <https://doi.org/10.3390/ijerph15112493>

³ Batista, M. F., de Carvalho-Ferreira, J. P., Thimoteo da Cunha, D., & De Rosso, V. V. (2023). Front-of-package nutrition labeling as a driver for healthier food choices: Lessons learned and future perspectives. *Comprehensive Reviews in Food Science and Food Safety*, 22, 535– 586. <https://doi.org/10.1111/1541-4337.13085>

⁴ Niessen, J. & Hamm, U. (2008). Identifying the gap between stated and actual buying behaviour on organic products based on consumer panel data. *Cultivating the Future Based on Science: 2nd Conference of the International Society of Organic Agriculture Research ISOFAR*, Modena, Italy, June 18-20, 2008.

⁵ Croker, H., Packer, J., Russell, S., Stansfield, C. & Viner, R.M. (2020) Front of pack nutritional labelling schemes: a systematic review and meta-analysis of recent evidence relating to objectively measured consumption and purchasing. *J Hum Nutr Diet.* 33, 518– 537 <https://doi.org/10.1111/jhn.12758>

⁶ Rogers, P. J., & Appleton, K. M. (2021). The effects of low-calorie sweeteners on energy intake and body weight: a systematic review and meta-analyses of sustained intervention studies. *International journal of obesity*, 45(3), 464-478.

⁷ Ashwell, M., Gibson, S., Bellisle, F., Buttriss, J., Drewnowski, A., Fantino, M., ... & La Vecchia, C. (2020). Expert consensus on low-calorie sweeteners: facts, research gaps and suggested actions. *Nutrition Research Reviews*, 33(1), 145-154.

⁸ Andrade, L., Lee, K. M., Sylvetsky, A. C., & Kirkpatrick, S. I. (2021). Low-calorie sweeteners and human health: a rapid review of systematic reviews. *Nutrition Reviews*, 79(10), 1145-1164.

We further emphasize a focus on scientific evidence as it relates to sweetness and taste preferences and health outcomes. Several comments were made during the listening session of a need to reduce the sweetness in foods in addition to reducing added sugars. The rationale for reducing sweetness is based on the hypothesis that reducing exposure to sweetness will lead to reduced preference for sweet foods, which in turn will lead to reduced consumption of sweet foods, reduced energy intake, and more favorable body weight and chronic health outcomes. However, recent reviews and expert perspectives, as well as the presentation by Dr. Wise in the listening session, have demonstrated limited evidence on the association of sweetness with preference, intake, or chronic health outcomes.^{9,10,11} More research is needed in this area to better understand if there is a health benefit of reducing sweetness before recommendations can be made for the sweetness level of foods.

IFT appreciates the opportunity to provide comments on strategies to reduce added sugars consumption in the US. We thank you for considering our comments. Please contact Anna Rosales, Senior Director Government Affairs and Nutrition (arosales@ift.org) if IFT may be of further assistance.

Sincerely,

Anna Rosales
Senior Director Nutrition and Government Affairs
Institute of Food Technologists

⁹ Higgins, K. A., Rawal, R., Baer, D. J., O'Connor, L. E., & Appleton, K. M. (2022). Scoping Review and Evidence Map of the Relation between Exposure to Dietary Sweetness and Body Weight-Related Outcomes in Adults. *Advances in Nutrition*, 13(6), 2341-2356.

¹⁰ Trumbo, P. R., Appleton, K. M., De Graaf, K., Hayes, J. E., Baer, D. J., Beauchamp, G. K., ... & Wise, P. M. (2021). Perspective: measuring sweetness in foods, beverages, and diets: toward understanding the role of sweetness in health. *Advances in Nutrition*, 12(2), 343-354.

¹¹ Public Health England. (2015). Sugar reduction: the evidence for action. Annexe 5: food supply. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470176/Annexe_5_Food_Supply.pdf