ADOPTING A SCIENCE BASED APPROACH TOWARDS LABELLING OF SWEETENERS

31 OCTOBER 2023

FIA FOOD INDUSTRY ASIA

VISION

To build a vibrant food and beverage industry for a healthy and prosperous Asia.

MISSION

To represent the food and beverage industry in Asia – promoting a climate for sustainable growth and serving as a regional knowledge hub for science-based advocacy.

OUR MEMBERS

FIA OPERATES ACROSS ASIA PACIFIC

Through our network of key stakeholders, we translate regional challenges and opportunities into country-level action on a number of business-critical issues.

We support our members by engaging with governments, policy makers and other key stakeholders – either directly or through existing local industry groups – to ensure their voices are heard and recognised across the region on the issues that matter.

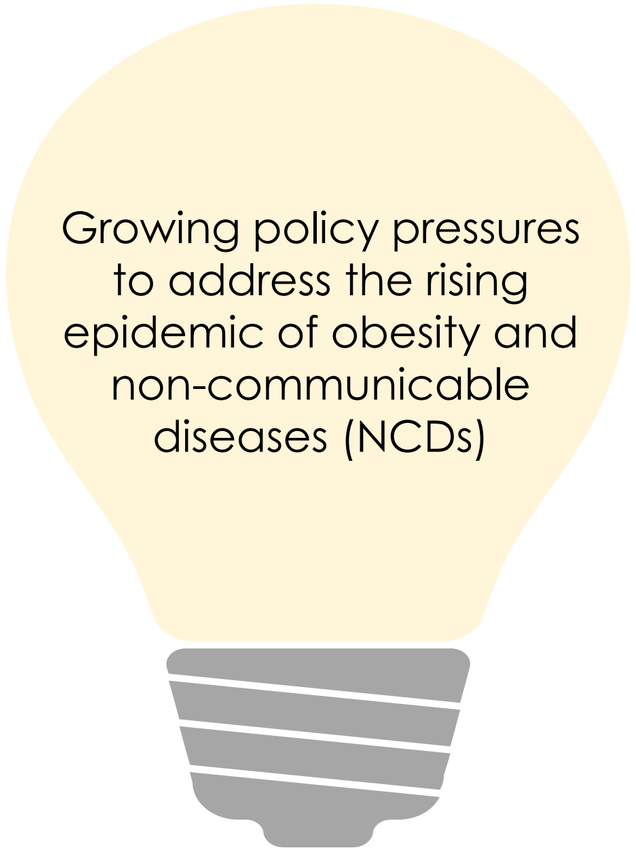
FIA STRATEGIC FOCUS AREAS

- FIA has **three strategic focal points** that give us structure in the day-to-day work we do. Through this lens we focus on the industry issues that are often entwined and linked together creating enormous complexity
- This gives FIA the ability to work across multiple issues and see the connections, and then **mobilise resources efficiently and effectively** to have positive outcomes and impact for industry.
- We constantly **horizon scan, analyse, organise members** and then **advocate** on behalf of industry across Asia Pacific.

STAKEHOLDER PERCEPTIONS OF SWEETENERS: REGULATORS, CONSUMERS & INDUSTRY

FIA FOOD INDUSTRY ASIA

THE CHALLENGE FOR INDUSTRY

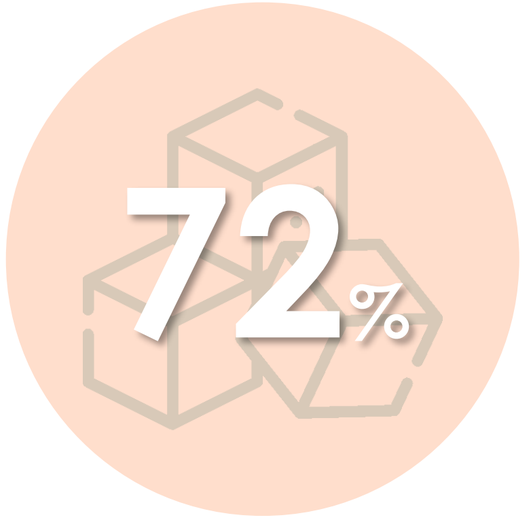


96% of food and beverage businesses have embarked on, or have plans to drive reformulation efforts in Asia.

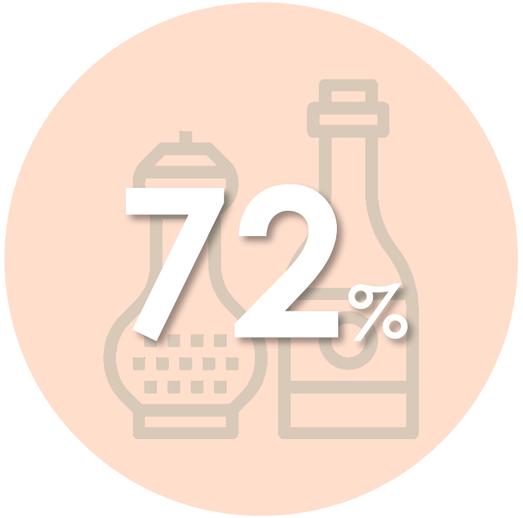
Asian consumers are shifting to healthier lifestyles and voting with their wallets for products with less sugar, salt, fat

Source: FIA Reformulation Study
(326 food & drink companies operating in UK, India, Indonesia, Malaysia, Singapore and Thailand)

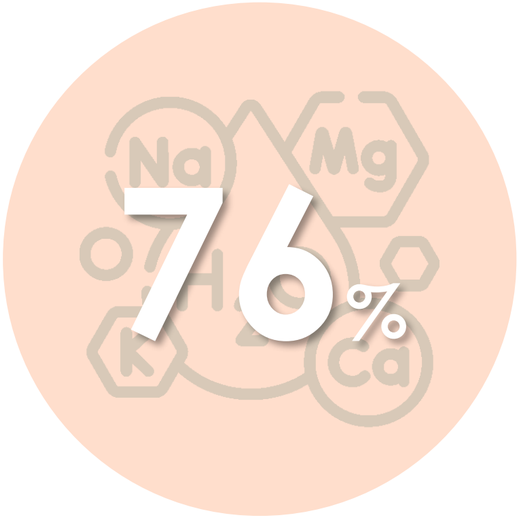
INDIAN CONSUMER PERCEPTIONS TO REFORMULATION ACTIVITY



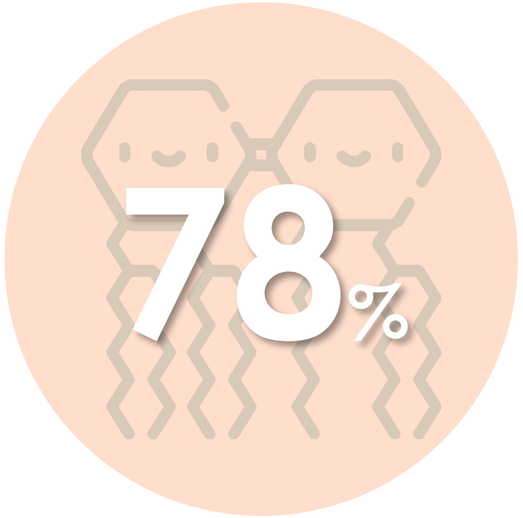
are happy for the industry to reformulate as long as the product recipes are changed to **include low/no calorie sweeteners (LNCS) instead of sugar** to make them healthier



are happy for the industry to reformulate as long as the product recipes are changed to **include alternatives to sodium/salt products** to make them healthier



are happy for the industry to reformulate as long as the product recipes are changed such that food products are **fortified with vitamins/minerals** to make them healthier



are happy for the industry to reformulate as long as the product recipes are changed such that **trans-fat are removed** from the products to make them healthier

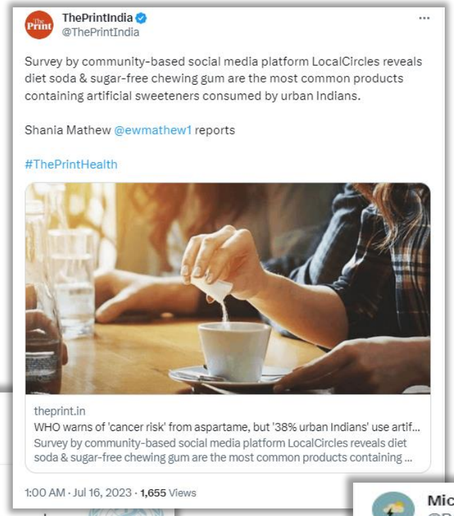
Source: FIA Reformulation Study
(1020 adults aged 18+ living in and around Mumbai, Bangalore and Chennai)

World Health Organization

- On 15 May 2023, the **World Health Organisation (WHO) finalised its** Guideline on Use of Non-Sugar Sweeteners (NSS), which remains very similar to the draft Guideline that underwent a public consultation between 15 July to 14 August 2022.
- The WHO **suggests that NSS not be used as a means of achieving weight control or reducing the risk of NCDs (conditional recommendation)**.
- The recommendation is **conditional** due to a **lack of certainty about the overall balance of desirable and undesirable effects associated with long-term NSS use for reducing NCD risk, and** the possibility that **reverse causation may have contributed to one or more of the associations observed** between long-term NSS use and risk of disease in prospective observational studies.
- As the recommendation is conditional, the WHO states **substantive discussion amongst policy-makers may be required before it can be adopted as policy.**
- As the Guideline is not based on toxicological assessments of the safety of individual NSS, it is **not intended to update or replace guidance on safe or maximal levels of intake established by JECFA** or other authoritative bodies.

IARC & JECFA EVALUATION RESULTS ON ASPARTAME

Click a screen cap to be directed to its source.



REGIONAL KOL PERSPECTIVES ON SWEETENERS

- **India**: Sweeteners accepted but there is a preference for Jaggery as more accessible in rural areas; artificial sweeteners seen as unhealthy by public

- **Indonesia**: Seen as positive for reducing sugar intake. Aspartame has some negative perceptions due to carcinogenic concerns

- **Malaysia**: concern over **habit-forming** with sweetness consumption, although there is preference for **stevia**

- **Philippines**: A generally **positive impression** towards both natural and artificial sweeteners with **natural being preferable**. However, there are **accessibility** issues for poorer regions

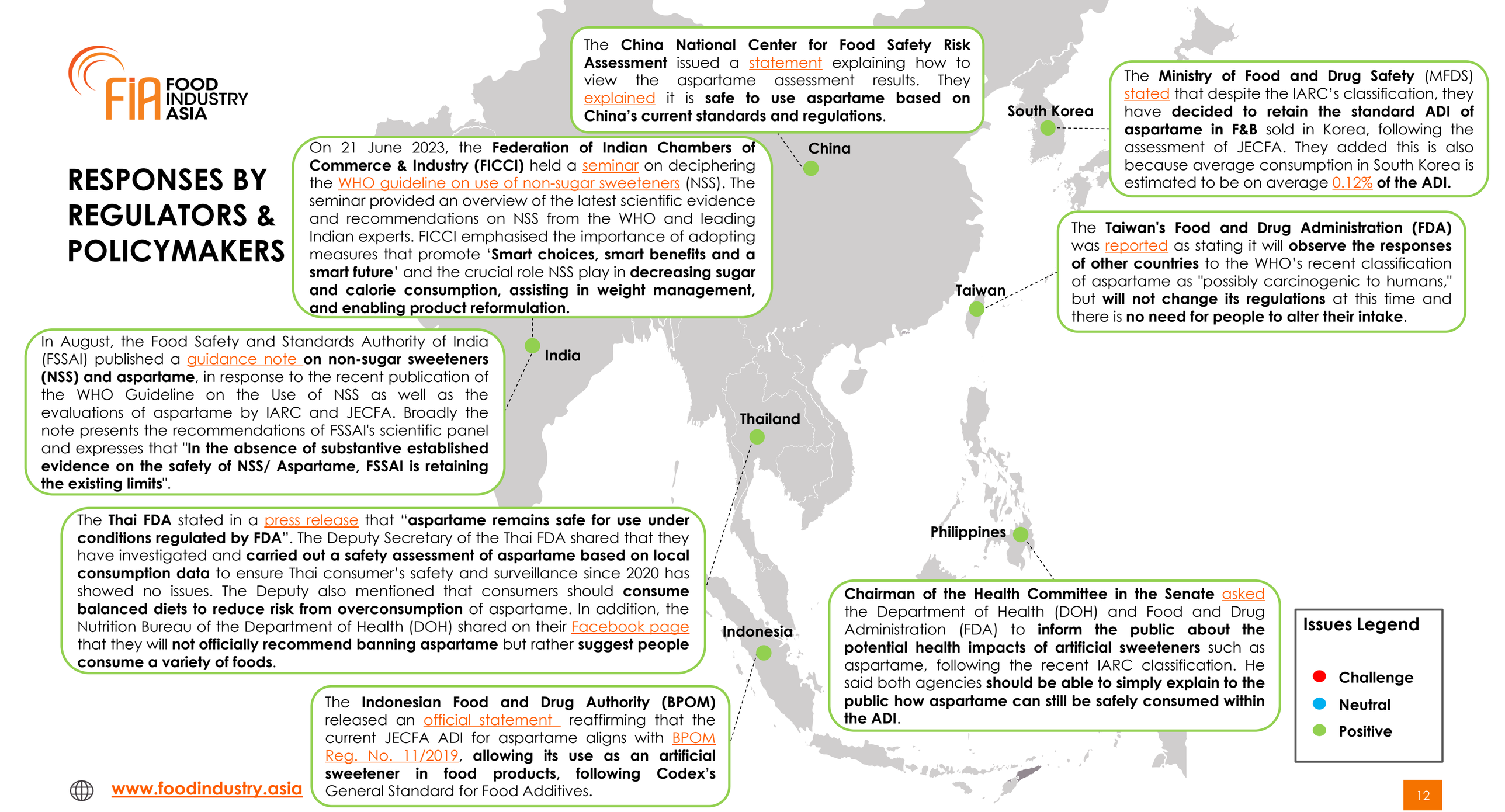
- **Singapore**: Embrace all kinds of sweeteners, especially natural sweeteners such as stevia and monk fruit; although there are **growing concerns about artificial sweeteners**

- **Thailand**: **Stevia taste isn't preferable** for consumers; some believe government won't want to affect sugar industry.

- **Vietnam**: **Very low knowledge of sweeteners;** issue is around calories rather than type of sweeteners

- As such, perceptions of sweeteners are generally positive in most markets.
- There is a belief among consumers that **natural is better than artificial.** The majority of stakeholders prefer to see the **industry promoting natural sweeteners.**
- Nevertheless both artificial and natural sweeteners are seen as a **less affordable** and **less accessible** option.

RESPONSES BY REGULATORS & POLICYMAKERS



The **China National Center for Food Safety Risk Assessment** issued a statement explaining how to view the aspartame assessment results. They explained it is **safe to use aspartame based on China's current standards and regulations**.

China

On 21 June 2023, the **Federation of Indian Chambers of Commerce & Industry (FICCI)** held a seminar on deciphering the WHO guideline on use of non-sugar sweeteners (NSS). The seminar provided an overview of the latest scientific evidence and recommendations on NSS from the WHO and leading Indian experts. FICCI emphasised the importance of adopting measures that promote '**Smart choices, smart benefits and a smart future**' and the crucial role NSS play in **decreasing sugar and calorie consumption, assisting in weight management, and enabling product reformulation.**

India

In August, the Food Safety and Standards Authority of India (FSSAI) published a guidance note **on non-sugar sweeteners (NSS) and aspartame**, in response to the recent publication of the WHO Guideline on the Use of NSS as well as the evaluations of aspartame by IARC and JECFA. Broadly the note presents the recommendations of FSSAI's scientific panel and expresses that "**In the absence of substantive established evidence on the safety of NSS/ Aspartame, FSSAI is retaining the existing limits**".

Thailand

The **Thai FDA** stated in a press release that "**aspartame remains safe for use under conditions regulated by FDA**". The Deputy Secretary of the Thai FDA shared that they have investigated and **carried out a safety assessment of aspartame based on local consumption data** to ensure Thai consumer's safety and surveillance since 2020 has showed no issues. The Deputy also mentioned that consumers should **consume balanced diets to reduce risk from overconsumption** of aspartame. In addition, the Nutrition Bureau of the Department of Health (DOH) shared on their Facebook page that they will **not officially recommend banning aspartame** but rather **suggest people consume a variety of foods**.

Indonesia

The **Indonesian Food and Drug Authority (BPOM)** released an official statement reaffirming that the current JECFA ADI for aspartame aligns with BPOM Reg. No. 11/2019, **allowing its use as an artificial sweetener in food products, following Codex's** General Standard for Food Additives.

South Korea

The **Ministry of Food and Drug Safety** (MFDS) stated that despite the IARC's classification, they have **decided to retain the standard ADI of aspartame in F&B** sold in Korea, following the assessment of JECFA. They added this is also because average consumption in South Korea is estimated to be on average 0.12% **of the ADI.**

Taiwan

The **Taiwan's Food and Drug Administration (FDA)** was reported as stating it will **observe the responses of other countries** to the WHO's recent classification of aspartame as "possibly carcinogenic to humans," but **will not change its regulations** at this time and there is **no need for people to alter their intake**.

Philippines

Chairman of the Health Committee in the Senate asked the Department of Health (DOH) and Food and Drug Administration (FDA) to **inform the public about the potential health impacts of artificial sweeteners** such as aspartame, following the recent IARC classification. He said both agencies **should be able to simply explain to the public how aspartame can still be safely consumed within the ADI**.

Issues Legend

- Challenge
- Neutral
- Positive

CONSUMERS AWARENESS ON SUGAR AND SWEETENERS

Concern on Sugar

Almost 7 in 10 respondents are concerned about the amount of sugar in products alongside additives, preservatives and cholesterol content when thinking about food and drinks.

Sugar VS LNCS

More than 5 in 10 respondents perceive sugar to be more harmful compared to LNCS.

Positive Role of LNCS

Almost 6 in 10 respondents believe that LNCS have a positive role to play in food and beverages.

Source: FIA – Glow Consumer Views on LNCS in Asia, July 2023
(n=3036; Surveyed countries include: India, Indonesia, Malaysia, Philippines, Singapore and Thailand)

The survey sought to understand consumer cognitive and behavioural impact to statements released pertaining to the safety linked with aspartame. Respondents were presented with the IARC statement (as a control) and two other randomly presented scenarios as part of the survey.

A slightly larger proportion (27%) expressed skepticism about the reliability of warning statements.

Scenario #3 (Warning Statements): the highest degree of neutrality was observed, with 25% of respondents holding a neutral stance towards warning statements.

Scenario #2 (Media Article) received the least amount of trust, as it had a non-trustability rate of 31%.

Scenarios #1 (IARC) and #5 (local food safety authority) garnered the highest levels of trust, with trustability percentages of 60% and 62%, respectively.

Source: FIA – Glow Consumer Views on LNCS in Asia, July 2023
(n=3036; Surveyed countries include: India, Indonesia, Malaysia, Philippines, Singapore and Thailand)

LABELLING OF SWEETENERS

FIA FOOD INDUSTRY ASIA

Provide consumers with the essential information about the food product, allowing them to make informed food choice.

Nutritional content of a product, including details about calories, fat, protein, carbohydrates, vitamins, and minerals, helps consumers manage their diets and **make healthier food choices based on their dietary needs** and goals.

Crucial safety information, such as allergen declaration, is **vital for individuals with food allergies or sensitivities to avoid potentially life-threatening reactions**.

List of ingredients used in a product, typically in descending order of quantity, allows consumers to **know what they are consuming** and **make choices based on the ingredients they prefer or need to avoid**.

TYPES OF SWEETENERS LABELLING AND DECLARATION

Declaration within the List of Ingredients

In accordance with the Codex General Standard for the Labelling of Prepackaged Food Products and numerous national legislations, sweeteners employed in food products are required to be **disclosed within the list of ingredients using their specified name or a recognised numerical identification**, such as the International Numbering System for Food Additives (INS).

Advisory Statement for Phenylalanine

To safeguard the well-being of individuals with phenylketonuria, many countries have mandated the **inclusion of an additional advisory statement for food products containing aspartame**. This is due to the fact that aspartame will be converted into phenylalanine within the human body.

Summary Statement for Sweeteners

To emphasise the presence of sweeteners in food products, many countries have required an additional summary statement to follow the list of ingredients, stating: "**Contains: (name of sweeteners)**" or the introduction of the class name "**Sweetener**" before the relevant ingredient.

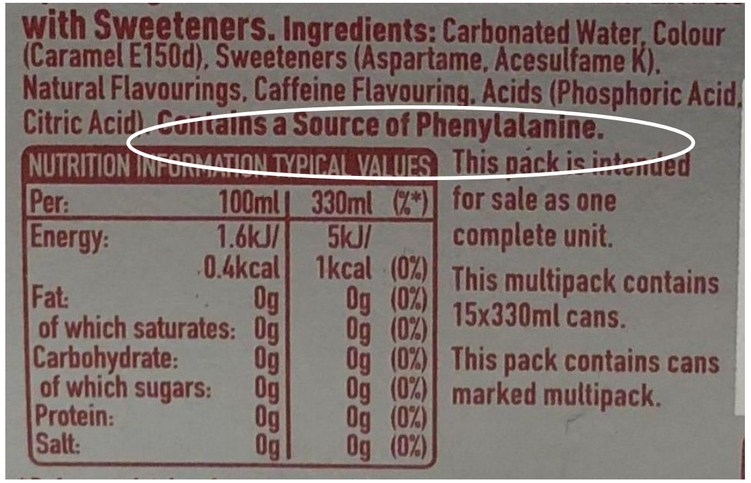
SWEETENER LABELLING VARIES AMONG GEOGRAPHIES

INDIA FOLLOWS A UNIQUE SWEETENER LABELLING

Conditions	Specific Labelling
Every Food containing **non-caloric sweetener**	CONTAIN NON-CALORIC SWEETENER THIS CONTAINS ---------- (NAME OF THE SWEETENER) (in 3 mm font size in a rectangular box)
Every Food containing **Aspartame**	CONTAIN NON-CALORIC SWEETENER THIS CONTAINS ---------- (NAME OF THE SWEETENER) Not recommended for **Phenylketonurics**; for **children suffering from seizure disorders**; **pregnant and lactating mothers**) (in 3 mm font size in a rectangular box)
Every Food containing **Ace-sulphame K**	CONTAIN NON-CALORIC SWEETENER THIS CONTAINS ---------- (NAME OF THE SWEETENER) Not recommended for **children; pregnant and lactating mothers**) (in 3 mm font size in a rectangular box)
Every Food containing mixture of **Aspartame- Acesulphame K**	CONTAIN NON-CALORIC SWEETENER THIS CONTAINS ---------- (NAME OF THE SWEETENER) Not recommended for **Phenylketonurics**; for **children; pregnant and lactating mothers** (in 3 mm font size in a rectangular box)
Every food containing **Saccharin**	CONTAIN NON-CALORIC SWEETENER THIS CONTAINS ---------- (NAME OF THE SWEETENER) Not recommended for **children** (in 3 mm font size in a rectangular box)

SIMILAR PRODUCTS LABEL LOOK DIFFERENT IN INDIA vs OTHER COUNTRIES

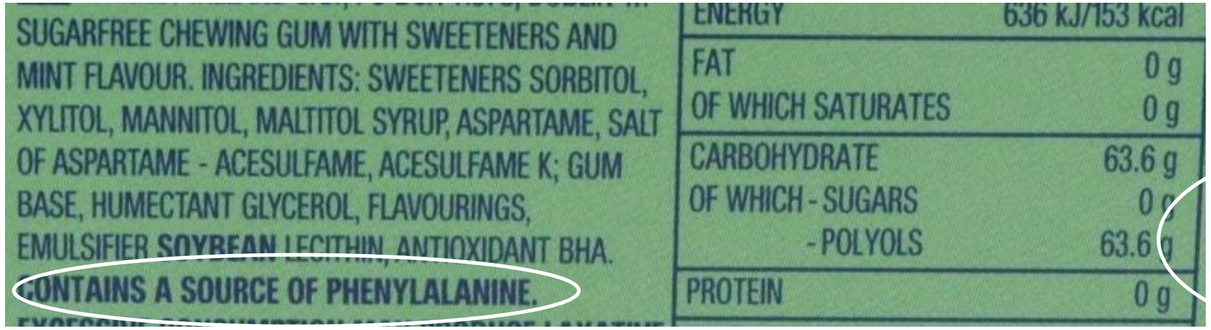
EX: CARBONATED WATER WITH ASPARTAME & ACESULPHAME –K



UK

INDIA

EX: SUGAR FREE CHEWING GUM WITH ASPARTAME & ACESULPHAME -K



UK

INDIA

GHANA

FIA RECOMMENDATIONS

FIA FOOD INDUSTRY ASIA

THE SAFETY OF LNCS HAS BEEN EXTENSIVELY ASSESSED PRIOR TO APPROVAL FOR USE IN FOOD & BEVERAGES

LNCS are **deemed safe for consumption** within the conditions and **limits of the Acceptable Daily Intake (ADI).** These limits are set by the Joint FAO/WHO Expert Committee on Food Additives **(JECFA)** and are also used as key scientific evidence for **CODEX** to set the maximum limits for additives in various food categories.

Recommendations from global public health organisations should be consistent with statements made by global regulatory authorities, and the hundreds of peer-reviewed scientific studies that confirm the safety of LNCS, even among sensitive populations such as pregnant women and children.

Joint FAO/WHO Expert Committee on Food Additives (JECFA)

- Sweeteners are food additives that are approved only if it can be shown no harmful effects are likely to result from their use.

European Food Safety Authority (EFSA)

- Under food additives, sweeteners are regulated substances which have been subjected to safety evaluation prior to market authorisation in the EU.

LNCS ARE AN IMPORTANT TOOL IN REFORMULATION, SUPPORTING INDUSTRY EFFORTS IN ADDRESSING PUBLIC HEALTH CHALLENGES

The **WHO** has recommended that people limit added sugars in their daily diet, and public health authorities worldwide are encouraging food and beverage manufacturers to **reduce or replace added sugars as an ingredient**, as part of an overall reformulation strategy.

The **United Nations** political declaration on NCDs called on the private sector to **strengthen the reformulation of products high in sugar as well as those high in saturated fat and sodium**.

The **ASEAN leaders' declaration** on the reformulation and production of healthier food and beverage options in October 2021 also reaffirmed the above, to manage public health challenges.

Industry Commitment

- Food industry has been actively driving its reformulation commitments to reduce added sugars within their product portfolios across key Asian markets (Singapore, Malaysia, Thailand, Indonesia, India, Philippines, and China).
- 82% have kickstarted their reformulation commitments in the past five years, using a variety of techniques to support their reformulation programmes.
- 80% of the sample focused its reformulation efforts on the reduction of added sugars, with 53% of the industry adopting lower/zero calorie sugar substitutes to support their reformulation efforts.

RECOMMENDED ACTION ITEMS FOR STAKEHOLDERS TO PROMOTE THE ADOPTON OF A SCIENCE BASED APPROACH TOWARDS LABELLING OF SWEETENERS

Encourage collaborative efforts among multiple stakeholders to educate consumers

Promote a science-backed and unified worldwide approach to sweeteners.

THANK YOU

Jelene Teo | Regulatory Affairs, Senior Executive | jieling.teo@foodindustry.asia