

INTERNATIONAL SWEETENERS ASSOCIATION - WRITTEN EVIDENCE (FDO0122)

1. The International Sweeteners Association is an international non-profit organisation with scientific aims representing suppliers and users of low/no calorie sweeteners, including tabletop sweetener manufacturers. Established over 35 years ago, the ISA is recognised by the European Commission, national and international regulatory and public health authorities, and the World Health Organisation, and has Non-Government Observer status with the Codex Alimentarius Commission which establishes international food standards.
2. ISA's mission is to provide healthcare professionals, researchers, regulatory bodies, policy makers, the media and consumers with science-based information to support public understanding of the safety and benefits of low/no calorie sweeteners.
3. The ISA would like to share its written submission with the Committee to address specifically the following topics, and provide accurate information on sweeteners to the Committee:
 - *"8. The role of the food and drink industry in driving food and diet trends and on the policymaking process."*
 - *"9. Lessons learned from international policy and practice, and from the devolved administrations, on diet-related obesity prevention."*
 - *"12. Policy tools that could prove effective in preventing obesity amongst the general population, including those focussed on the role of the food and drink industry in tackling obesity."*
4. The ISA would like to highlight that low/no calorie sweeteners can help individuals to reduce overall calorie intake and to meet recent dietary guidelines recommending the reduction of excessive sugar consumption while still enjoying sweet taste.
5. Following the commitment made at the United Nation level¹ on fighting Non-Communicable Diseases (NCDs), it is important to reinforce an inclusive public policy on prevention and control of NCDs, to re-affirm the role of industry in this multi-stakeholder process through food and drink reformulation, and to further promote a science-based approach.
To advance the efforts to tackle NCDs, the recognition of low/no calorie sweeteners as a safe and useful alternative to sugar is

¹ Political Declaration of the High-level Meeting of the General Assembly on the Prevention and Control of Non-communicable Diseases, 19 Sep 2011, <https://digitallibrary.un.org/record/710899?v=pdf>. See also the outcome document of the high-level meeting of the General Assembly on the comprehensive review and assessment of the progress achieved in the prevention and control of non-communicable diseases. <https://digitallibrary.un.org/record/774662?ln=fr&v=pdf>

helpful.

6. Sweeteners, like all food additives, have to undergo a thorough safety assessment before they are approved. In fact, low/no calorie sweeteners are among the most thoroughly researched ingredients. Regulatory food safety bodies around the world confirm their safety and allow their use. An extensive number of scientific studies have been evaluated by globally recognised authorities, including the Food Standards Agency, the Joint Food and Agriculture Organisation (FAO)/ World Health Organisation (WHO) Expert Committee on Food Additives (JECFA), the European Food Safety Authority (EFSA) and the U.S. Food and Drug Administration (FDA). **These authorities have all consistently confirmed that low/no calorie sweeteners are safe.**

Removing significant amounts of sugars from a food or drink has a noticeable impact on the sensory profile of the product, which can impact on overall consumer liking for the product². Low/no calorie sweeteners are important ingredients for manufacturers as they are the only means of giving foods and beverages a palatable sweet taste without all the calories of sugar. As industry is seeking to satisfy consumer preferences and deliver on its commitment to reduce the amount of sugar through reformulation, consumer acceptance of low/no calorie sweeteners is critical³. **Supporting consumer confidence in these ingredients as a valuable alternative to sugar will reinforce the reformulation effort within the overall objective to stem the rise of NCDs.**

7. Consuming a low/no calorie sweetened food or beverage instead of the sugar-sweetened version, can help reduce overall daily sugar intake. In turn, when used as part of a balanced diet and healthy lifestyle, this can result in lower energy intakes and help with lowering excess body weight.^{2,3}
8. Evidence shows that low/no calorie sweeteners do not raise blood glucose levels or affect blood glucose control.⁴ The European Commission permits the following health claim, on the basis of the scientific evidence: "*consumption of foods/drinks containing low/no-calorie sweeteners instead of sugar induces a lower blood glucose rise after their consumption compared to sugar-containing foods/drinks*".^{5,6} The availability of these ingredients has made possible a wider range of lower sugar products that can provide a greater choice for people with diabetes. As they provide no calories,

² Gibson S, Ashwell M, Arthur J, et al. What can the food and drink industry do to help achieve the 5% free sugars goal? *Perspect Public Health*. 2017;137(4):237-247

³ Ashwell M, Gibson S, Bellisle F, et al. Expert consensus on low-calorie sweeteners: facts, research gaps and suggested actions. *Nutr Res Rev*. 2020;33(1):145-154

⁴ <https://www.who.int/news-room/fact-sheets/detail/obesity-and-overweight>

low/no calorie sweeteners, when used in place of sugar, can also help in lowering excess body weight, which is a risk factor for diabetes. ⁷

9. The ISA would like to highlight national situations where policies aiming at fighting obesity unduly targeted sweeteners, hence preventing one of the tools to contribute to the overall effort. This is the case in countries where specific negative front of pack labelling logo or sentence is imposed on products and beverages containing sweeteners, like in Mexico, Argentina or Colombia. Countries like France also include sweeteners in the scope of their tax on beverages. There is no scientific evidence that such measures are preventing the rise of NCDs: obesity and diabetes levels in these countries continue to increase⁴. **We believe such approaches are counterproductive. They confuse consumers, sow distrust in safety evaluation authorities work, counter the efforts of operators to reformulate products and undermine the many benefits these authorised ingredients provide to consumers.**
10. The ISA remains at the Committee disposal for any further information. We would also welcome the opportunity to directly provide explanations to the Committee.

8 April 2024