



An FDA Update: Sugary Ingredients' Impact on Added Sugar Labeling

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Sugars Labeling

“**Total Sugars**” – Nutrition Labeling & Education Act of 1990
sum of all free mono- and disaccharides

- such as glucose, fructose, lactose, and sucrose
- Declared under “Carbohydrate”
- number of grams of sugars in a serving
- not required for less than 1 gram per serving if no sugar or sweetener claims - both caloric and non-caloric sweeteners, including sugar alcohols, are sweeteners for this regulation.
- “Not a significant source of” footnote if not declared
- Round to nearest gram
- Can use “Contains less than 1 gram” or “less than 1 gram”
- if the serving less than 0.5 gram may declare as “0”
- **No Percent Daily Value**

Nutrition Facts			
Serving Size 2/3 cup (55g)			
Servings Per Container About 8			
Amount Per Serving			
Calories	230	Calories from Fat 72	
		% Daily Value*	
Total Fat	8g		12%
Saturated Fat	1g		5%
Trans Fat	0g		
Cholesterol	0mg		0%
Sodium	160mg		7%
Total Carbohydrate	37g		12%
Dietary Fiber	4g		16%
Sugars	1g		
Protein	3g		
Vitamin A			10%
Vitamin C			8%
Calcium			20%
Iron			45%
* Percent Daily Values are based on a 2,000 calorie diet. Your daily value may be higher or lower depending on your calorie needs.			
	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

Sugars Labeling

FDA regulations are intended to support public health goals

The final Nutrition Facts rule includes a listing of “added sugars” the old label simply listed the total grams of sugar without distinguishing between sugars that are naturally occurring and sugars that align with the definition of added sugars established by the Dietary Guidelines for Americans - caloric sweeteners that include sugar, honey and maple syrup as well as other sweeteners.

“In determining which sugars should be included in the definition of added sugars, we have considered the presence of added sugars as a component of dietary intake and whether it is consistent with the concept of empty calories, as discussed in the 2015 Dietary Guidelines Advisory Committee (DGAC) report - recommendation that Americans eat no more than 10% of their daily calories from added sugars in order to reduce their risk of chronic disease like heart disease.”

- FDA Commissioner Scott Gottlieb, M.D.

Added Sugars

New Addition To The 2016 Nutrition Facts Update

added during the processing of foods or packaged as such

Include:

- sugars (free, mono- and disaccharides),
- sugars from syrups and honey
- sugars from concentrated fruit or vegetable juices in excess of the same amount of 100% fruit or vegetable juice

Includes a % Daily Value – 50g (based on 2,000 calorie diet)

Nutrition Facts	
8 servings per container	
Serving size	2/3 cup (55g)
Amount per serving	
Calories	230
% Daily Value*	
Total Fat 8g	10%
Saturated Fat 1g	5%
<i>Trans Fat</i> 0g	
Cholesterol 0mg	0%
Sodium 160mg	7%
Total Carbohydrate 37g	13%
Dietary Fiber 4g	14%
Total Sugars 12g	
Includes 10g Added Sugars	20%
Protein 3g	
Vitamin D 2mcg	10%
Calcium 260mg	20%
Iron 8mg	45%
Potassium 235mg	6%
<small>* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.</small>	

Added Sugars

New Addition To The 2016 Nutrition Facts Update

Not labeled as added sugars:

- fruit or veg juice concentrated from 100% juice sold to consumers for reconstituting fruit or vegetable juice concentrates:
- used towards the total required juice % label declaration
- for Brix standardization
- to formulate for standardized jellies/jams/preserves or fruit component of fruit spreads

whole fruit, fruit pieces, dried fruit, pulps, purees - nutrient rich, maintain basic fruit properties when added to foods which are not considered to contain added sugars

Added Sugars

New Addition To The 2016 Nutrition Facts Update

When a mixture of naturally occurring and added sugars is present in the food, and for specific foods containing added sugars, alone or in combination with naturally occurring sugars, where the added sugars are subject to fermentation and/or non-enzymatic browning, the manufacturer must make and keep records to verify the declared amount of added sugars in the label and labeling of food.

Added Sugars

what about concentrated fruit and vegetable purees, fruit and vegetable pastes, and fruit and vegetable powders?

If the ingredient contains all whole fruit or vegetable components processed so plant material is physically broken down to smaller pieces or water removed, sugars contributed from the portion of the fruit or vegetable used to make the ingredient would **not** be considered “added sugars”.

if a fruit or vegetable is processed to no longer contain all typically eaten whole fruit or vegetable components (e.g., the pulp from the fruit has been removed) and the sugars have been concentrated – this is consistent with fruit juice concentrate (Added Sugars) because the ingredient is a concentrated sugars source and contributes additional calories when added as an ingredient without additional water.

consider whether the ingredient has been processed to no longer contain all the typically eaten original components of the original portion in addition to being concentrated. Sugars in excess of what would be expected from 100% fruits or vegetables are Added Sugars.

manufacturers are processing different ingredients made from whole fruits or vegetables - ***FDA considers specific information about how an individual ingredient is processed to determine if sugars meet definition of added sugars.***

Added Sugars

Draft Guidance

- How to calculate the amount of added sugars in a fruit juice blend containing the juices of multiple fruits not reconstituted to 100 percent - 3 methods
- Ingredients containing mono- and disaccharides (DPI and DP2 [one and two degrees of polymerization]) created through processes such as hydrolysis.
- Sugars present in a sweet fermented beverage after fermentation
- Sugar origin non-enzymatic browning created ingredients added for coloring and flavoring - how much is added sugars on the label
- Sugar added for fermentation during leavening (baked goods), some consumed by yeast, reduction accounted for

Questions and Answers on the Nutrition and Supplement Facts Labels Related to the Compliance Date, Added Sugars, and Declaration of Quantitative Amounts of Vitamins and Minerals: Guidance for Industry

Draft Guidance

This guidance is being distributed for comment purposes only.

Sugars Labeling

FDA Brix values for reconstituting fruit or vegetable juice concentrates to single-strength

Juice	100 percent juice ¹
Acerola	6.0
Apple	11.5
Apricot	11.7
Banana	22.0
Blackberry	10.0
Blueberry	10.0
Boysenberry	10.0
Cantaloupe Melon	9.6
Carambola	7.8
Carrot	8.0
Casaba Melon	7.5
Cashew (Caju)	12.0
Celery	3.1
Cherry, dark, sweet	20.0
Cherry, red, sour	14.0
Crabapple	15.4
Cranberry	7.5
Currant (Black)	11.0
Currant (Red)	10.5
Date	18.5
Dewberry	10.0
Elderberry	11.0
Fig	18.2
Gooseberry	8.3
Grape	16.0
Grapefruit	² 10.0
Guanabana (soursop)	16.0
Guava	7.7
Honeydew melon	9.6
Kiwi	15.4
Lemon	² 4.5
Lime	² 4.5
Loganberry	10.5
Mango	13.0
Nectarine	11.8
Orange	² 11.8
Papaya	11.5
Passion Fruit	14.0
Peach	10.5
Pear	12.0
Pineapple	12.8
Plum	14.3
Pomegranate	16.0
Prune	18.5
Quince	13.3
Raspberry (Black)	11.1
Raspberry (Red)	9.2
Rhubarb	5.7
Strawberry	8.0

Tangerine	² 11.8
Tomato	5.0
Watermelon	7.8
Youngberry	10.0

¹ Indicates Brix value unless other value specified.

² Indicates anhydrous citrus acid percent by weight.

³ Brix values determined by refractometer for citrus juices may be corrected for citric acid.

21 CFR 101.30(h)

Sugars Labeling

Recent Food & Drug Administration Updates

January 2017

the sugars in a bag of sugar are included in the definition of added sugars in the final rule. e.g. total sugars for a serving of sugar would be 17 grams (g) and the added sugars declaration would also be 17g.

Pure Granulated Sugar, 10 lb

Nutrition Facts	
567 servings per container	
Serving size	2 tsp. (8g)
Amount per serving	
Calories	30
% Daily Value*	
Total Fat 0g	0%
Saturated Fat 0g	0%
Trans Fat 0g	
Cholesterol 0mg	0%
Sodium 0mg	0%
Total Carbohydrate 8g	3%
Dietary Fiber 0g	0%
Total Sugars 8g	
Includes 8g Added Sugars	16%
Protein 0g	
Vitamin D 0mcg	0%
Calcium 1mg	0%
Iron 0mg	0%
Potassium 0mg	0%

* The % Daily Value tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

Sugars Labeling

Recent Food & Drug Administration Updates

January 2017

concerns from honey and maple syrup industries that sugars from honey and maple syrup as added sugars implied adulteration because no sugars have been added to the products - consumers might misinterpret the added sugars declaration to mean that non-endogenous sweeteners, such as corn syrup or cane sugar, have been added to the pure product.

February 2016 FDA issued:

Draft Guidance for Industry: Declaration of Added Sugars on Honey, Maple Syrup, and Certain Cranberry Products

Allows use of a “†” symbol immediately after the added sugars percent Daily Value information on pure honey, pure maple syrup leading to truthful non-misleading statements outside the Nutrition Facts label providing additional information about added sugars.

Nutrition Facts	
16 servings per container	
Serving size	1 Tbsp. (21g)
Amount per serving	
Calories	60
% Daily Value*	
Total Fat 0g	0%
Saturated Fat 0g	0%
Trans Fat 0g	
Cholesterol 0mg	0%
Sodium 0mg	0%
Total Carbohydrate 17g	6%
Dietary Fiber 0g	0%
Total Sugars 17g	
Includes 17g Added Sugars	34%†
Protein 0g	
Vitamin D 0mg	0%
Calcium 0mg	0%
Iron 0mg	0%
Potassium 0mg	0%

* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

† All these sugars are naturally occurring in honey.

Sugars Labeling

Recent Food & Drug Administration Updates

January 2017

concerns about cranberries - a naturally tart fruit - consumers might avoid cranberry products sweetened for palatability in favor of products with the same amount of total sugar, but list 0 grams of “added sugars” because they are inherently sweet. the “†” symbol provides opportunity to clarify that sugars are added for palatability.

February 2018 FDA issued:

Draft Guidance for Industry: Declaration of Added Sugars on Honey, Maple Syrup, and Certain Cranberry Products

Allows use of a “†” symbol immediately after the added sugars percent Daily Value information **on certain cranberry products** sweetened with added sugars that contain total sugars at levels no greater than comparable products with endogenous (inherent) sugars, but no added sugars, leading to truthful non-misleading statements outside the Nutrition Facts label with additional information about added sugars.

Nutrition Facts	
8 servings per container	
Serving size	1 cup (240ml)
<hr/>	
Amount per serving	
Calories	110
<hr/>	
	<small>% Daily Value*</small>
Total Fat 0g	0%
Saturated Fat 0g	0%
Trans Fat 0g	
Cholesterol 0mg	0%
Sodium 5mg	0%
Total Carbohydrate 27g	9%
Dietary Fiber 0g	0%
Total Sugars 25g	
Includes 23g Added Sugars	54%†
Protein 0g	
<hr/>	
Vitamin D 0mcg	0%
Calcium 0mg	0%
Iron 0mg	0%
Potassium 45mg	1%
<hr/>	
<small>* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.</small>	

† Sugars added to improve the palatability of naturally tart cranberries. The 2015-2020 Dietary Guidelines for Americans state that there is room for limited amounts of Added Sugars in the diet, especially from nutrient dense food like naturally tart cranberries.



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Draft Guidance for Industry: Declaration of Added Sugars on Honey, Maple Syrup, and Certain Cranberry Products

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*Contains Nonbinding Recommendations
Draft - Not for Implementation*

February 2018

- Resources**
- [Download the Draft Guidance \(PDF: 152KB\)](#)

www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/ucm595578.htm

*Contains Nonbinding Recommendations
Draft-Not for Implementation*

The Declaration of Added Sugars on Honey, Maple Syrup, and Certain Cranberry Products: Guidance for Industry **Draft Guidance**

This guidance is being distributed for comment purposes only.

www.fda.gov/downloads/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/UCM596469.pdf

Sugars Labeling

Recent Food & Drug Administration Updates

- final guidance anticipated early next year before Jan. 2020 Nutrition Facts compliance date will provide a path forward for pure, single-ingredient “packaged as such” products that does not involve the standard “added sugars” declaration on the Nutrition Facts label.
- not considering changes to the required percent daily value for these products.
- strikes the balance of addressing producer concerns that products could be perceived as being economically adulterated while still informing consumers on how products contribute to daily added sugar intake.
- comments submitted and feedback from stakeholder meetings inform for issuing final guidance.
- over 3,000 comments received – indicate further opportunities to update proposed approach.
- feedback helped identify a solution that we think will more adequately address concerns and provide needed clarity to consumers.

FDA Commissioner Scott Gottlieb, M.D.



The Declaration of Added Sugars on Honey, Maple Syrup, and Certain Cranberry Products

Docket Folder Summary [View all documents and comments in this Docket](#)

Docket ID: FDA-2018-D-0075 **Agency:** Food and Drug Administration (FDA)
Parent Agency: Department of Health and Human Services (HHS)

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3,705

Comments Received*

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Primary Documents [View All \(5\)](#)



The Declaration of Added Sugars on Honey, Maple Syrup, and Certain Cranberry Products: Draft...

Comment Period Closed
Jun 15, 2018 11:59 PM ET

Proposed Rule Posted: 04/25/2018 ID: FDA-2018-D-0075-0083



The Declaration of Added Sugars on Honey, Maple Syrup, and Certain Cranberry Products; Draft...

Comment Period Closed
May 01, 2018 11:59 PM ET

Proposed Rule Posted: 03/02/2018 ID: FDA-2018-D-0075-0001



Request for Extension from International Maple Syrup Institute

Comment Period Closed

Other Posted: 04/17/2018 ID: FDA-2018-D-0075-0054

Comments [View All \(3,705\)](#)



Concerning FDA labeling requirements of added sugar on products which have no added sugar. This would be wrong and illegal. Why should the FDA be allowed to...

[View Comment](#) Posted: 10/18/2018 ID: FDA-2018-D-0075-3718



I can't believe that the FDA thinks that the American people are too stupid to know that pure maple syrup and honey doesn't contain sugar. Anyone who cares to...

[View Comment](#) Posted: 08/03/2018 ID: FDA-2018-D-0075-3714

Both the Nutrition Facts panel
and
labeled ingredient lists
can influence or even drive product development

Nutrition Facts	
Serving Size: 1 bottle (20 oz)	
Serving Per Container: 1	
Amount Per Serving	
Calories	275
	% Daily Value*
Total Fat	0 g 0%
Sodium	175 mg 7%
Total Carbohydrate	78 g 26%
Sugars	65 g
Protein	0 g
INGREDIENTS: WATER, SUCROSE, GLUCOSE, HIGH FRUCTOSE CORN SYRUP, NATURAL FLAVORS, ARTIFICIAL COLORS, ASCORBIC ACID.	

Consumers “no sugar” challenge sometimes includes no fruit!

Clean Labeling Has Driven The Labeling Of Sweeteners

Sugars can be

- Raw
- Turbinado
- Brown

Other sweeteners perceived as “clean” or “unprocessed”/not refined
Molasses

Honey

Agave

FDA and Industry Style “Cane Juice.”

“FDA’s current policy is that sweeteners derived from sugar cane syrup should not be declared as ‘evaporated cane juice’ because that term falsely suggests that the sweeteners are juice ”

FDA's Decision On The Natural Status Of “High-Fructose Corn Syrup”

Consumer lawsuits: 'natural' deceitful due to HFCS , a "highly processed sugar substitute" created through "enzymatically catalyzed chemical reactions"

FDA initially objected to natural for HFCS, then advised the Corn Refiners Association that it's OK if synthetic fixing agents have no contact with high dextrose equivalent corn starch hydrolysate & acids used to get starch hydrolysate must meet natural policy

However, most consumer research surveys show they do not consider HFCS to be natural and perceive it as processed

“Non-GMO” Claims Have Driven The Labeling Of Sweeteners

Most corn and beet sourced sugars are gmo-sourced

So “Cane Sugar” identifies a non-gmo sourced sugar

But cane sugar can be treated with bone-char (for whitening) – vegans don’t want
some vegan cane sugars are becoming available

Sweeteners – FDA Alternative Names

“Glucose syrup” can be specified by type

“Corn syrup”

“Wheat syrup”

“Tapioca syrup”

“Lactose” can be declared as “Milk sugar”.

“Cane syrup” as “Sugar cane syrup”

Ingredients And Nutrition Facts Can Influence Perception Of Sugar Content

e.g. the “Boomer” generation seeks to avoid

- Sugar - presence of HFCS in ingredient list

Millenials are reportedly not as concerned with HFCS in the ingredient list

Purchase Intent

68% willing to pay more for products that don't contain ingredients perceived as "bad"

53% - exclusion of undesirable ingredients more important than including beneficial. (beverages free of artif. sweeteners outperforming calorie-free beverages with antioxidants.)

- research from the Nielsen Co. as reported in "Clear and clean labeling needed on products" Meat and Poultry News 8/30/17