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REFORMULATION: AFTER THE FOCUS ON NUTRIENTS, CALORIE REDUCTION SHOULD BE THE NEW PRIORITY

In its May 2020 Communication on a Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system, the European Commission aims at stimulating food processing, wholesale, retail, hospitality and food services practices notably by launching initiatives to stimulate reformulation of processed food, including the setting of maximum levels for certain nutrients.

In this respect, CEFS shares the view of EU sugar manufacturers below. Given the importance of energy intake when fighting obesity and thus noncommunicable diseases (NCDs), taking into account the numerous roles that sugar plays in foods, and in light of the efforts already accomplished on individual nutrients, the EU sugar producers call on the European Commission to take stock of what has already been accomplished and focus on reformulation practices that actually lead to calorie reductions.

CEFS also views the potential setting of maximum limits of sugars in foods as disproportionate and not tackling the real problem of excessive calorie intake. The timing of this initiative is also premature given the still ongoing EFSA review of the latest science on sugars.

1. To fight overweight and obesity and thus NCDs, tackling overall energy intake is key

Overweight and obesity are complex and multifactorial issues, but in the end always caused by an imbalance between energy intake (consumption of all types of food and beverages) and energy expenditure (the energy our body actually uses), resulting in a positive energy balance and body weight gain[i].

Reformulation must be seen in the context of overweight and obesity and the search for contributing to a solution. CEFS supports this overall aim. Indeed, fighting overweight and obesity is crucial because it is at the origin of diet-related noncommunicable diseases such as Type 2 diabetes, cardiovascular diseases and certain types of cancer.

2. When it comes to reformulation, calorie reduction should be the new priority

Reformulation has been undertaken for many years and has already led consumers to be offered a broad range of products; the EU must now take stock of what has already been done and address the issue of calorie reduction.

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- There is already a broad range of reformulated products on the market, including sugars-reduced and sugars-free versions, and the current coexistence of regular and nutrient/energy-reduced versions guarantees that consumers can compose a varied and balanced diet that will suit their dietary needs.

- Several nutrients, among which sugars, have already been tackled at EU level. Through the adoption of the EU Framework for National Initiatives on Selected Nutrients, a variety of strategies have been set up to encourage the food industry to reduce the content of certain nutrients in food and drink products. After salt and saturated fat, Member States and the European Commission agreed on an Added Sugars Annex end of 2015, which recommended an added sugars reduction of 10% by 2020 for certain food categories. In parallel of this work, a Joint Action on Nutrition and Physical Activity undertook to examine reformulation efforts and seek a methodology to monitor them.

3. Ensuring that sugar reductions lead to simultaneous energy reductions is crucial

Sugar is a multifunctional ingredient that cannot simply be "taken out" of food and drinks.

- Besides their sweetening properties, sugars have technological and functional properties (e.g. sugars provide texture in biscuits and chocolate, act as fermentation substrate in pastry and pizzas, mask acidity in ketchup, act as natural preservative in jams).

- Sugars are a multifunctional ingredient and no other single ingredient or additive (intense sweeteners, sugar substitutes) can replace all the functions of sugar.

Less sugar does not necessarily mean fewer calories.

- While reducing sugar in sugars-sweetened drinks lead to less calories in the products (since sugar is merely replaced with additives), this is not the case of solid foods. This is because to maintain the texture & structure, reducing sugar often requires adding other caloric ingredients (or additives).

- For instance, reducing the sugar content of carbohydrate-based products such as breakfast cereals or biscuits does not reduce calories as the sugar that is taken out is generally replaced by nutrients like starch or fat. In other cases (e.g., chocolate powders), sugar is replaced with maltodextrin. Starch and maltodextrin are carbohydrates just like sugar and thus deliver the same calories (4 kcal/g), while fat deliver more calories than sugar (9kcal/g).

4. Setting maximum limits of sugars in foods is disproportionate and does not tackle the real problem of excessive calorie intake

- Considering these above points, setting maximum limits of sugar will encourage unhelpful reformulation practices where sugars are merely replaced with other ingredients having similar nutritional impact (carbohydrates) or additives, thereby bringing no calorie reduction and no nutritional benefits for consumers.

- Focusing on single nutrients disregards the importance of the overall quality of the diet adapted to consumers' individual lifestyles. Sugar can play a role in a healthy and balanced diet.

- Given the political intervention in companies' free choice of formulation and freedom of competition that this initiative represents, the abidance with the proportionality principle would have to be ensured and would have to be based on a sound scientific basis. This would require the implication of the European Food Safety Authority (EFSA). In the case of sugar, EFSA did not set an upper limit for sugars based on their effects on body weight and other issues such as Type-2 diabetes, cardiovascular risk factors, and dental caries, despite recognizing that high intakes of sugars in the form of sugars sweetened beverages might contribute to weight gain.[ii] EFSA was asked to review the latest science, and is expected to complete their work in 2021.

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[i] Te Morenga L *et al.* (2013) Dietary sugars and body weight: systematic review and meta-analyses of randomised controlled trials and cohort studies. BMJ; 346: e7492; Fattore, E., Botta F., Agostoni C., Bosetti C. Effects of free sugars on blood pressure and lipids: a systematic review and meta-analysis of nutritional isoenergetic intervention trials. Am J Clin Nutr. 2017 Jan;105(1):42-56; Hall, K. D. & Guo, J. Obesity Energetics: Body Weight Regulation and the Effects of Diet Composition. *Gastroenterology* 152, 1718–1727 (2017), which indicated that "*for all practical purposes 'a calorie is a calorie' when it comes to body fat and energy expenditure differences between controlled isocaloric diets varying in the ratio of carbohydrate to fat*"; Naude CE, *et al* (2014) Low Carbohydrate versus Isoenergetic Balanced Diets for Reducing Weight and Cardiovascular Risk: A Systematic Review and Meta-Analysis. PLoS ONE 9(7): e100652. https://doi.org/10.1371/journal.pone.0100652.

[ii] European Food Safety Authority, Scientific Opinion on Dietary Reference Values for carbohydrates and dietary fibre. EFSA Journal 2010; 8(3):1462[77pp.]. doi:10.2903/j.efsa.2010.1462.