



6 October 2023

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Added Sugars Team  
Food Standards Australia New Zealand  
CANBERRA ACT 2610

Email: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

**Re: Proposal P1062 Defining Added Sugars for Claims Consultation Paper**

I write on behalf of Citrus Australia to provide comments in response to Food Standards Australia New Zealand's (FSANZ) Proposal P1062 Defining Added Sugars for Claims Consultation Paper, released on 11 September.

Citrus Australia thanks FSANZ for the opportunity to provide comments to the amended draft variations in Schedule 4 No Added Sugars Definition, for the regulation of no added sugar claims for fruit juice, fruit purees, fruit pastes and fruit drinks.

Citrus Australia is the prescribed peak industry body for the Australian citrus industry. It develops and maintains national and international networks, leveraging relationships in citrus growing, packing, juicing, marketing and research in Australia and around the world.

**General comments**

Citrus Australia supports FSANZ's assessment in Proposal P1062 to continue to set 'no added sugar(s)' claim conditions of ingredients to foods within the Australia New Zealand Food Standards Code, however, is not in support of some of the proposed changes and definitions as outlined elsewhere in this submission.

Citrus Australia does not support FSANZ's proposals that place further restrictions on claims for the juice category for the addition of purees, powders and pastes, to juice, working against industry and consumer understanding of what an added sugar means within the Food Standards Code.

Naturally occurring sugars are intrinsic to fruit and vegetable juice. Consumers understand that "juice with no added sugar"/100% juice is a premium product containing only intrinsic fruit sugars; and no further sugar added during manufacturing. Under P1062 this juice quite rightly retains the ability to make a "no added sugar" claim.

Using this understanding, where a consumer sees a single strength juice or juice drink containing a blend of intrinsic fruit sugars – juice, paste, puree, powder, juice concentrate – and where no further sugar has been added during manufacturing, they conclude, we believe correctly, that this drink has "no added sugars". To claim that adding an intrinsic fruit sugar to a drink – without the addition of actual sugar in manufacturing – changes its definition to an "added sugar" drink only confuses the consumer. A good example of this is a

juice containing fruit juice and a puree, such as mango which can't be juiced. We believe this type of drink should retain its ability to make a no added sugar claim.

The definition of 'added sugar' should enable consumers to make informed choices in support of dietary guidelines, help bolster Health Star Rating guidance, and inform them which are intrinsic fruit sugars, whether those are from fruit juice paste, puree, concentrate or powder. It should not confuse or mislead them, which we believe the proposed approach in its current format, does.

We also believe that a fruit drink that meets Standard 2.6.2 for fruit drinks should be able to make a 'no added sugar' claim, where no sugar, added during manufacturing, is present in the product. There needs to be a distinction between fruit drinks that contain no sugar added during manufacturing and fruit drinks that do. It is incongruous that a fruit drink without added sugar (essentially a diluted fruit juice) cannot make a 'no added sugar' claim. Further, it is questionable as to the advantage to the consumer and their purchasing decision if all fruit drinks are labelled in the same manner, regardless of the presence of added sugar. Without this distinction, consumers cannot make an informed decision and will likely be further confused, which is clearly not the intention of the Proposal.

#### **Specific comments**

Citrus Australia has reviewed the proposed amendments to Schedule 4 and discussed the impact of each issue in consultation with the wider non-alcoholic beverages industry through the Australian Beverages Council Limited (ABCL). The views of the non-alcoholic beverages industry are appropriately and accurately expressed in the ABCL's submission to the P1062 consultation paper. Citrus Australia confirms its strong support for the positions detailed in the ABCL's submission and supports any additional information provided to FSANZ to justify these positions.

Thank you for taking the time to consider Citrus Australia's position on Proposal P1062 and this supporting letter of the ABCL's submission. If you wish to discuss any aspects of this letter, please contact me directly.

Yours faithfully,

A large black rectangular redaction box covering the signature and name of the sender.