

THERE ARE NO ADDED SUGARS IN SUGAR

SUGAR IS:

- + Extracted from beet and cane plants
- + Pure, has nothing added to it
- + A single ingredient product



Consumers know what sugar is.

THE ISSUE: FDA'S NEW FOOD LABEL

FDA is proposing that single ingredient sweeteners (sugar, honey and maple syrup) list added sugars on their labels, yet all three products have no sugars or ANY ingredients added to them. They are all pure products. This requirement is inaccurate and confusing.

Sugar, honey and maple syrup are all pure sweeteners, nothing is added.

ADDED CONFUSION:

FDA has proposed a disclaimer for honey and maple syrup stating that added sugars in honey and maple syrup are naturally occurring. This proposal was made without consumer testing and consumer research has shown it is confusing. While the proposed disclaimer is unjustified, should it become final, sugar should also include a disclaimer like other pure sweeteners.

To imply that something has been added to sugar is false and misleading.

CONSUMER CONFUSION

When presented with FDA's new label:

- + Consumers are confused about the grams of total sugars in a serving, this is what matters in terms of health
- + A majority of consumers believe that sugar contains added sugars
- + Consumers believe FDA's label does not represent a pure product, even when the label contains the disclaimer
- + 69% of consumers said proposed labels for honey, maple syrup and sugar do **NOT** reflect equally pure products, putting sugar at a market disadvantage



THERE SHOULD BE NO ADDED SUGARS LABELING REQUIREMENT FOR SUGAR

The label that is most accurate and least confusing is the label where sugar contains 0 grams at added sugars.

We conducted consumer research using four variations of the Nutrition Facts Label.



Consumers found these three versions confusing and misunderstood the information being displayed.



Consumer research shows the least confusing label for sugar contains 0 grams of added sugars and no disclaimer.



Nutrition Facts	
227 servings per container	
Serving size	2 tsp.
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 0g Added Sugars	0%
Protein 0g	0%
Vitamin D 0mcg	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.

FDA's proposed label for a bag of sugar, listing sugar as "added sugars"

Nutrition Facts	
227 servings per container	
Serving size	2 tsp.
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	0%
Vitamin D 0mcg	0%
Calcium 0mg	0%
Iron 0mg	0%
Potassium 0mg	0%

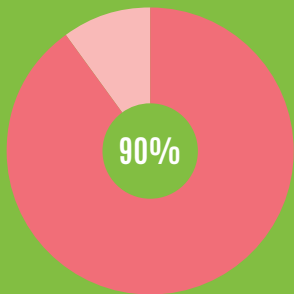
*The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

FDA's proposed disclaimer for honey and maple syrup (but not sugar)

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	0%
Vitamin D 0mcg	0%
Calcium 0mg	0%
Iron 0mg	0%
Potassium 0mg	0%

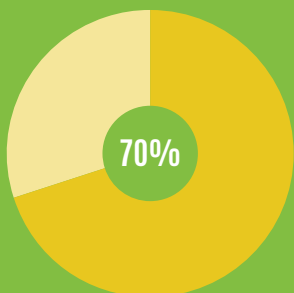
*The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

†All these sugars are naturally occurring in honey.



9 out of 10 consumers

believe this best conveys that sugar is pure with nothing added.



7 out of 10 consumers

believe this best conveys that there are 8 grams of sugar in a serving.

Mock up of label with sugar disclaimer

Nutrition Facts	
227 servings per container	
Serving size	2 tsp.
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	0%
Vitamin D 0mcg	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 sugar beet or sugar cane.