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**STRICTLY CONFIDENTIAL**

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**Sugar in the Nutrient and Promotion Profile Model**

**Background**

Where national guidelines exist for this age group, most recommend that free-sugar intake for infants should be as low as possible, indicating that any NPM developed **should address the use of added sugars and sweetening agents as well as the use of fruit purée as an ingredient.**

In the analysis of products, many savoury-type meals sold in the United Kingdom and Denmark derived over 15% energy from total sugars, with fruit purée providing much of the sugar content even in ostensibly savoury products. Similar to fruit juices, these sugars can be considered free sugars, due to the high maceration and consequent release of sugars from the cell wall.

It is clear that added sugars are an issue in For Infants Young Children (FIYC) in the 10 countries assessed in the validation study: addition of free sugars was identified as the most wide-spread issue and reason for products to ‘fail’ the draft NPM. Many more products would be considered suitable on all other criteria if free sugars were not added.

**The sugar criteria in the NPPM**

Sugar thresholds have been set across product categories in the NPPM to address free sugars, and we have stipulated the need for a Front Of Pack (FOP) warning label on products that are high in sugar where:

* + >30% energy is from sugar in fruit or vegetable purees, desserts and dry fruit
	+ >40% energy is from sugar in dairy foods

**A note on fruit purees as a form of free sugar**

We have not banned fruit puree (as a form of free sugar) from the Model entirely as this would essentially ban many fruit products from the market. Rather, we have focused on the appropriateness of fruit puree as an ingredient across categories and restricted its use where products are savoury based meals, and by appropriate levels in other products (laid out in the table below). By including a FOP warning label on products which are high in sugar as a result of high levels of fruit puree, we are making consumers aware of where fruit products are high in ​naturally-occurring sugar.

**Sugar overview by category:**

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| Category  | Sugar threshold  | Intervention  | Rationale  |
| 1, 3.1,3.2,  | Dry cereals, fruit and veg purees, fruit desserts  | **> 30% total sugar** in dry cereals, fruit and veg purees and fruit desserts are classified as high sugar products  | FOP Warning label for products >30% total sugar | * The dry cereal category does not account for added sugars introduced when milk is added (lactose) so the 30% FOP label is based on the dry product
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| 2 | Dairy  | **> 40% total sugar** in dairy products classified as high sugar products  | FOP Warning label for products >40% total sugar  | There is an additional sugar allowance for dairy to allow for lactose - we don't want to disallow inherently healthy products such as natural yoghurt because of their intrinsic sugarsThe threshold was set at 40% because this is the natural total sugar content of many plain yogurts.However, the fruit content is specified as being <5% which means ​the 40% threshold relates MAINLY to milk sugars and somewhat to a small degree, the sugars derived from any fruit content. ​The low 5% fruit content in the dairy category means that MOST fruit-containing products are pushed out of dairy into category 3.1 (see below) and are therefore subject to the more stringent 30% FOP label as more of the sugar is coming from 'liberated fruit sugars' rather than lactose. |
| 4.1-4.5 and 5.2  | Meals and snacks  | **Max 15% energy from total sugar** in meals and snacks is permitted  | * Products with more than 15% energy from total sugar FAIL the NPPM and are not permitted
* No FOP warning label is applied - the products are banned entirely
 | * If a meal or snack product contains more than 15% energy from total sugars it is not permissible
* If products include >15% total sugar the meal would be sweet, and the Model aims to ensure meals are savoury in their taste profiles
* Non-fruit sugary snacks are not permitted in the NPPM
* ​We only permit 100% fresh or dry fruit snacks. Where dry fruit snacks must be whole or in pieces e.g. apple slices or raisins and not reconstituted like fruit gums)
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