



Established in 1943, our members are U.S. sugar beet and cane growers, processors and refiners.























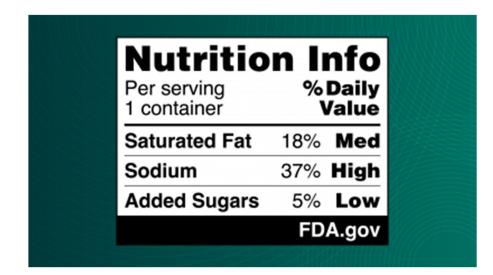




The Sugar Association is the scientific voice of the U.S. sugar industry. We make a difference by responsibly supporting scientific research and sharing our knowledge to enhance consumer understanding and confidence in the role that real sugar plays in a nutritious, balanced and enjoyable diet.

FDA's Proposed Rule: FRONT-OF-PACK

- Released in January 2025
- FDA calls it, "Nutrition Info Box"
- Added Sugars Cutoff Criteria
 - Low = 5% DV = 2.5 grams or less
 - Medium = 6 9% DV = 3 9 grams
 - High = 20+% DV = 10 grams or more
- No mention of low- and no-calorie sweeteners in the proposed rule







- 1. Getting up to speed
- 2. MAHA Supporters & Sugar
- 3. What we hope matters



2025 DGAC Report Released

DGAC = Dietary Guidelines Advisory Committee recommended the DGAs keep added sugars to less than 10% of calories. The Biden Amin did not issue final DGAs.



The proposed Biden Admin's FOP label includes ONLY saturated fat, sodium and added sugars with high/medium/low designations. High = >10 grams. Low = < 2.5 grams.



Beginning this spring,
MAHA enthusiasm swept
across the nation with
several states requesting
SNAP waivers from USDA
and introducing bills
focusing on certain
ingredients.



HHS/USDA to Define UPFs

UPF = Ultra-Processed Foods. A universally accepted defintion does not currently exist. Many of RFK Jrs touted goals will require a definition.

December January February April May July

FDA Defines "Healthy"



The Biden Admin finalized the definition of Healthy, and the Trump Admin kept it. Most products >2.5 g of added sugars are not eligible for Healthy designation. Healthy symbol to come.

MAHA Commission Formed

Trump signed an EO to form this group focused on childhood diseases, comprised of 7 cabinet members, and other officials, led by RFK Jr and the DPC. Tasked with producing two reports over 180 days.

MAHA Commission Releases 1st Report

This laid out what is known and not known about the causes of child diseases. Nutrition focus was on UPFs and corporate influence in policy and research.



Nutrition Policy Activity

Fall 2024 to Present

MAHA Commission's **2nd Report**

By August 12 the Commission will submit its report to the President on strategies to reverse childhood disease. This playbook will define the next few years for food and nutrition policy.

August



Likely to look very different that previous versions with promises of a shorter, consumer-friendly document focusing on whole foods. What these DGAs contain will be critical for other policies.



RFK Jr has hinted about his desire for warning labels and possibly needing Congress to carry this out. Rulemaking began under Biden and the comment period is closed. TBD on future.

on Ingredients

With a patchwork of state laws on ingredients, industry hopes for relief through federal intervention. Similarly, as more states seek restrictions on SNAP, we could see federal action.

Federal Action

Possible

and SNAP



Fall 2025 Winter

Through the fall of 2026



UPFs Defined

Defining UPF is central to the goals of RFK Jr and likely will impact DGAs. School Meals and Labeling initiatives.



Likely updates to School **Meal Standards**

Expect that with new DGAs there will be changes such as milkfat allowances and no or fewer processed foods allowed.



Possible Sugar Reduction Targets

For years, FDA has thrown around the idea of category limits for added sugars as exist for sodium. FDA has recently raised this again.



Nutrition Policy

What could come over next 15 months

President's Physical Fitness Test: It's BACK



On July 31, Trump signed an Executive Order to restore the program after 13 years, with goals of:

- Restoring health and fitness for America's youth
- Maintaining a strong and vital
 America
- Making America active again



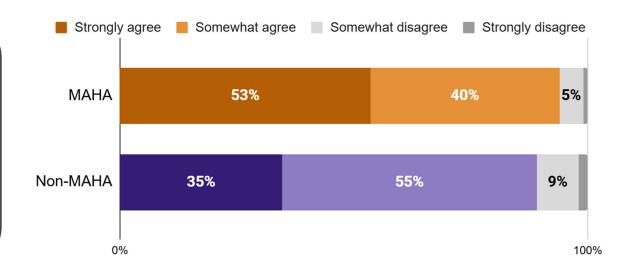
Science-based guidelines for real sugar and transparency for artificial sweeteners:

Win-win for President Trump's health agenda



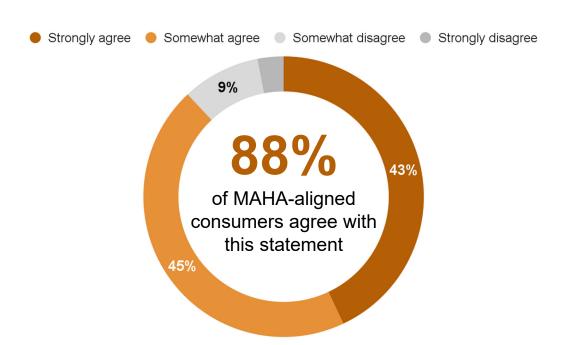
Americans – including and especially MAHA supporters – agree that real sugar fits into in a healthy lifestyle and balanced diet.

A healthy lifestyle is about a balanced approach to eating and physical activity, making room for indulgences, and avoiding anything in excess. Real sugar has a place in a balanced diet by adding flavor and functions that help people enjoy a wide variety of foods.



And the vast majority of MAHA supporters agree that real sugar - as a natural product - can play a role in the movement.

Real sugar made from sugar beets and sugar cane plays an important role in our food supply. And as a natural preservative with many functions in food, it fits well into the "Make America Healthy Again" movement to decrease the amount of industrial additives in our food supply.

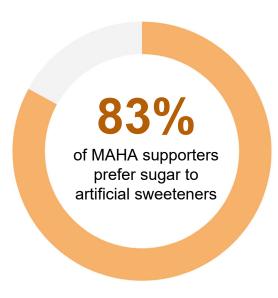


Most consumers – including MAHA supporters – prefer sugar to artificial sweeteners.

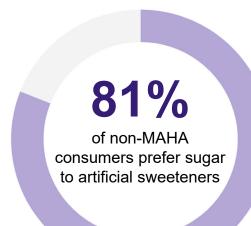
Preference Between Sugar and Artificial Sweeteners

Between the two, which is...

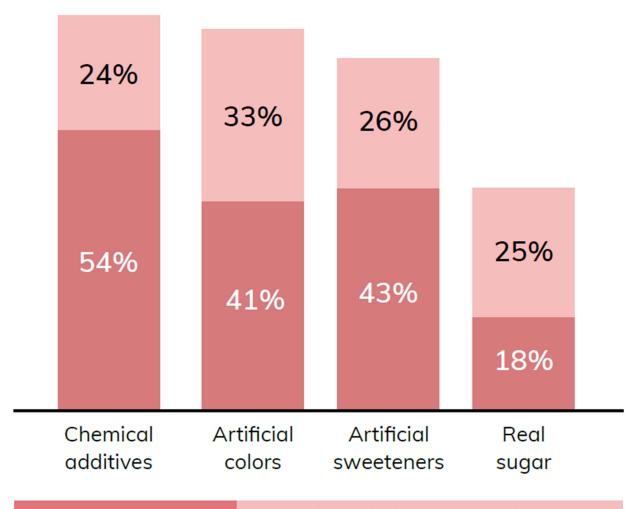
MAHA Supporters



General Population







I actively avoid this

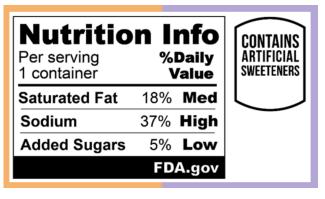
I significantly limit my intake of this

Est. 2020

Did you know that U.S. law doesn't require food companies to clearly identify these sweeteners or reveal how much sweetener is in our food. Join the Campaign for Sweetener Transparency to demand change.



3 in 4 Americans prefer a front-of-pack label that discloses the inclusion of artificial sweeteners.



Nutrition Info
Per serving
1 container

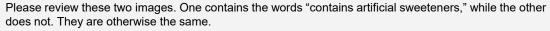
Saturated Fat
Sodium
Added Sugars

SME

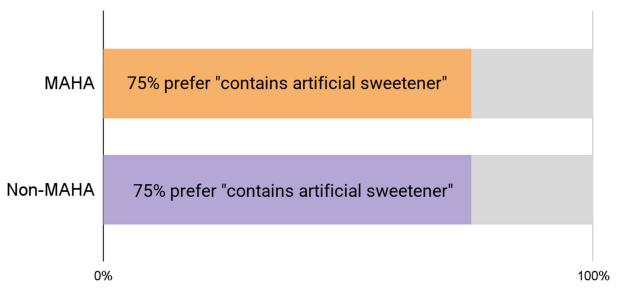
SME

SOM

FDA.gov



Imagine you were planning to purchase this food product. Assuming the product contains artificial sweeteners, which of these labels would you prefer to see on the product?



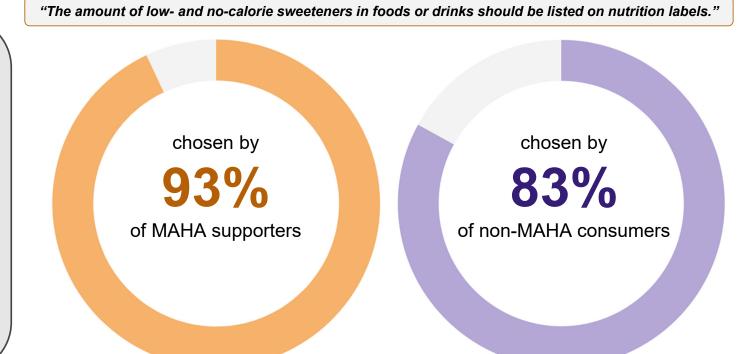
QUADRANT STRATEGIES

And the vast majority of Americans want to see the <u>amount</u> of low- and no-calorie sweeteners listed on nutrition labels.

Currently, government regulations do not require the **amount** of low- and no-calorie sweeteners present in food or drinks to be listed on nutrition labels. Which of the following is closest to your view?

Choices shown:

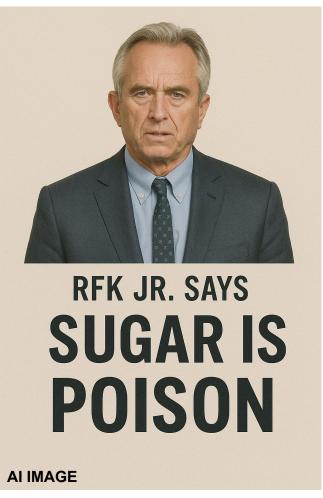
- The amount of low- and nocalorie sweeteners in foods or drinks should be listed on nutrition labels
- The amount of low- and nocalorie sweetener in foods or drinks should not be listed on nutrition labels



QUADRANT STRATEGIES

What will be sugar's fate?







MAHA: A Movement with Support

~60+% of Americans support MAHA (June poll)

RFK Jr. Promised to:

- Focus on children
- Scrutinize additives in our food supply
- Remove financial conflicts of interest from federal agencies
- Create an honest, unbiased, gold standard science at HHS
- Medical freedom
- Reverse the chronic disease epidemic

RFK JR: "The first thing I've done every morning for the past 20 years - is get on my knees and pray to God that He would put me in a position to end the chronic disease epidemic and to help America's children."





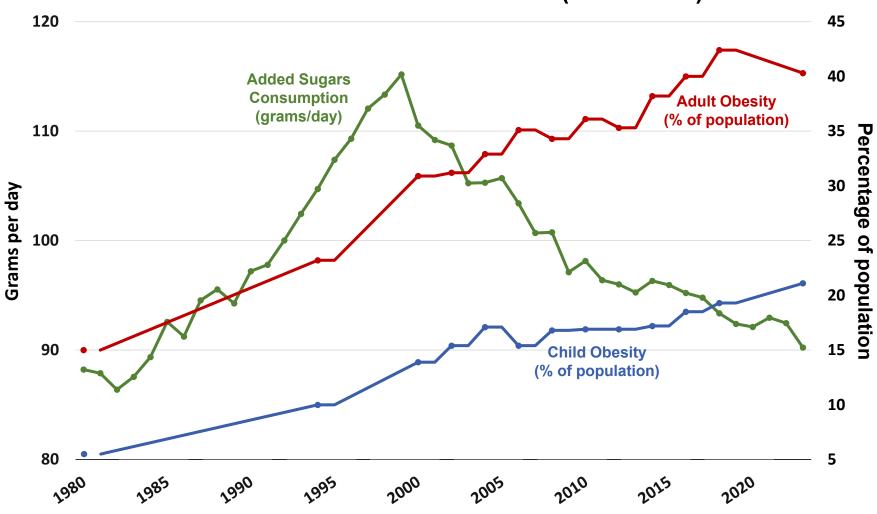
Added Sugars Consumption

Lowest in 40 Years: 13% of calories

Near Lowest Ever: 1909 (11%)



ADDED SUGARS vs. OBESITY (1980-2023)



Sources: USDA ERS Food Availability Reports, NHANES Obesity Estimates



When sugar is removed, new ingredients need to take it's place.

There is no substitute for sugar.



Nutrition Facts

About 13 servings per container
Serving size 2 tbsp (32g)

Amount Per Serving

Calories 190

	
% Daily Value	
Total Fat 16g	21 %
Saturated Fat 3.5g	18%
Trans Fat Og	
Cholesterol Omg	0%
Sodium 150mg	7 %
Total Carbohydrate 6g	2%
Dietary Fiber 2g	7 %
Total Sugars 3g	
Includes 3g Added Sugars	s 6 %

Protein 7g

Vitamin D Omcg	0%
Calcium Omg	0%
Iron 0.4mg	2%
Potassium 94mg	2%
Vitamin A Omcg	0%
Vitamin C Omg	0%
Vitamin E 1.5mg	10%
Niacin 3.2mg	20%
Copper Omg	

^{*} 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.

Original Peanut Butter



Reduced Sugar Peanut Butter



Despite the "1/3 Less Sugar" claim, calories have increased by 20

Nutrition Facts

About 13 servings per container

Serving size 2 tbsp (32g)

Amount Per Serving

Calories

210

	10
% рапу (/alue*
Total Fat 17g	22 %
Saturated Fat 4g	20%
Trans Fat Og	
Cholesterol Omg	0%
Sodium 100mg	4%
Total Carbohydrate 6g	2%
Dietary Fiber 2g	7 %
Total Sugars 2g	
Includes 2g Added Sugars	4%
Protein 7g	7 %
Vitamin D Omcg	0%
Calcium Omg	0%
Iron 0.4mg	2%
Potassium 94mg	2%
Vitamin E 3mg	20%
Niacin 3.2mg	20%
Copper Omg	

* 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.

5000% INCREASE

in product introductions containing alternative sweeteners

from 1995-1999 compared to 2020-2024.



Bread • Cereal • Granola bars • Yogurt Ice cream • Milk • Children's beverages

ON AVERAGE, EVERY YEAR SINCE 2000, OVER 1,000
NEW FOOD AND BEVERAGE PRODUCTS

entered the marketplace with a sugar claim.

Not All Sources of Added Sugars Are The Same

- Don't have the same roles in the diet
- Provide different nutrients
- Are consumed in differing amounts by different population subgroups
- Are associated with different health outcomes
- Are just not the same





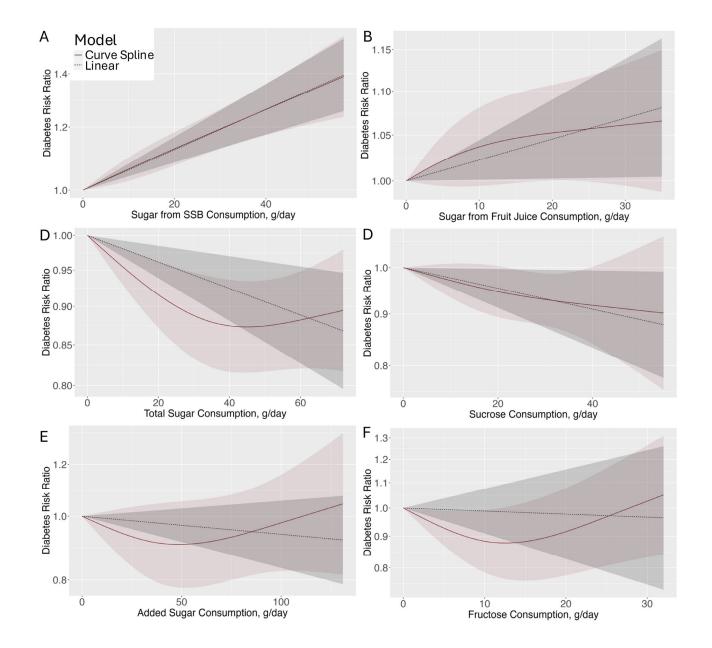
NEW Study: Sugars Intake and Diabetes Risk

- Scope: May 2025 systematic review and dose-response meta-analysis of 29 cohort studies involving over 800,000 adults across five continents
- Objective: The study aimed to determine whether different types and sources of sugar (e.g., total, added, fructose, sucrose, sugar-sweetened beverages [SSBs], and fruit juice) have different effects on T2D risk

Key findings:

- Drinking one extra sugar-sweetened beverage per day increases your risk of type 2 diabetes by 25%.
- The sucrose/diabetes dose-response relationship was linear—higher sucrose intake steadily correlated with lower diabetes risk.
- Results challenge the assumption that all sugars increase diabetes risk.
- Context matters—sucrose in nutrient-rich foods (like whole-grain cereal or yogurt) may not be harmful and could even be beneficial.
- Emphasizes the importance of **food source** and **form** (solid vs. liquid), not just sugar type.

https://www.sciencedirect.com/science/article/pii/S2161831325000493#fig2



Recognition that a Dietary Reference Intake (DRI) for Added Sugars Does NOT Exist

Dietary reference intakes (DRIs) are a set of scientifically developed reference values for nutrients.

DRI values provide the scientific basis for nutrition professionals, governments, and non-governmental organizations to carry out activities such as:

- Developing nutrition labels
- Developing dietary guidelines and food guides
- Ensuring foods and supplements contain safe levels of nutrients
- Creating patient and consumer counseling and educational programs
- Assessing nutrient intakes and monitoring the nutritional health of the population

It's important that DRIs remain up to date to support the health of people living in the United States.

https://odphp.health.gov/our-work/nutrition-physical-activity/dietary-guidelines/dietary-reference-intakes

Dietary Guidelines for Americans:

History of Sugars Recommendations

1980 Avoid too much sugar

1985 Avoid too much sugar

1990 Use sugars only in moderation

1995 Choose a diet moderate in sugars

2000 Choose beverages and foods to moderate your intake of sugars

2005 No specific sugars guideline

2010 Reduce intake of calories from added sugars

2015 Limit calories from added sugars to <10%

2020 Less than 10% of calories from added sugars for 2yrs+

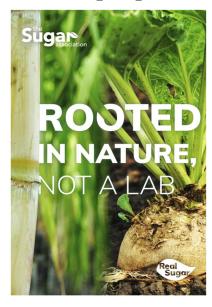
Avoid added sugars <2yrs

*10% of calories = 200 calories or 50 grams or 12 tsp based on a 2000 calorie diet. *Note:* There are 15 calories in 1 teaspoon of sugar.



Road Ahead

- Sugar should be consumed in moderation as part of a balanced diet.
- It comes from plants grown by people and is "real", unlike alternatives.
- Real sugar is a versatile ingredient by manufacturers AND home cooks.
- When sugar comes out of foods, other things (i.e., calories and additives) go in.
- Sweetener transparency is important to Americans.
- Added sugars are found in many UPFs and are still perceived by many/most to be the drivers of obesity.
- So few people know the facts and the science and this remains a challenge.









RFK Jr. On the Record

"If you like a McDonald's cheeseburger and a Diet Coke, which my boss loves, you should be able to get them! If you want to eat hostess Twinkies, you should be able to do that. But you should know what the impacts are on your family and on your health," Kennedy (during Finance Committee Hearing on Jan 29).



State Level Activity > Federal

There are 147 product policy bills in 40 states, including:

- •75 bills to ban colors in 31 states;
- •54 bills to ban colors in schools in 30 states;
- •5 Generally Recognized as Safe (GRAS) bills;
- 18 bills to require labels in 12 states; and
- 17 bills that define ultra processed foods in 14 states.



Ultra-processed foods [UPF]: defined

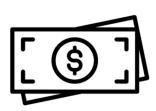
Some criteria for a definition include:



Use of additives



Sophisticated packaging



Profitable



Owned by transnational corporation

NOVA classification system

Category 2

Vegetable oils, butter, vinegar. Salt, sugar and molasses from cane or beet, honey extracted from combs and syrup from maple trees.

Category 4

Industrially created food products created with the addition of multiple ingredients that may include some Group 2 ingredients as well as additives to enhance the taste and/or convenience of the product (e.g., HFCS, LNCS)

Ultra-processed foods: translated

SUGAR

"But for some characteristics that are disproportionately present in ultra-processed foods – sodium, added sugars, and saturated fat – there is already substantial evidence of harm when these nutrients are consumed in e STAT

SALT

"High intake of ultraprocessed foods – particularly processed meats, sugary breakfast foods, and sugar – or artificially sweetened beverages – may increase risk of early death according to a study."



FAT

"About 14% of adults are clinically addicted to food, predominantly ultraprocessed foods foods with higher levels of sugar, salt, fat and additives."





SAI Position on "Nutrition Info Box"

"The Sugar Association supports transparency, but this draft label offers only the illusion of transparency – it entirely leaves out total calories and the use of industrial additives like artificial sweeteners. In fact, by singling out added sugars, FDA is once again knowingly incentivizing proliferation of artificial sweeteners that hide behind chemical names Americans do not recognize - including in food for children.

We support the goal of limiting added sugars to less than 10% of total calories, but this should not be achieved by misleading consumers or manipulating the food supply with more additives. Most Americans prefer to avoid low- and no-calorie sweeteners in food, and health organizations have repeatedly raised concerns about their widespread use. At some point, some agency needs to acknowledge that we don't have a good grasp on how pervasive these sweeteners have become in our food supply, unbeknownst to most Americans."

Trends in added sugars consumption: 1999-2018

