

The Sugar Association

Oral Statement of Mr. Andrew C. Briscoe

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I am Andrew Briscoe, President and CEO of the Sugar Association. The Sugar Association represents the country's sugar cane growers and refiners and sugar beet growers and processors. The Sugar Association would like to offer the following comments for FDA's consideration as they contemplate what action FDA can take to educate and assist the American public in their quest for good health and well being. First and foremost I would like to say that I can assure you that no food company wants people to be obese. The Sugar Association has called for more involvement by all stakeholders including representatives from the food industry to fight the battle against obesity and that is why I am here to testify before you today.

Question 4 asks: Are there changes needed to food labeling that could result in the development of healthier, lower calorie foods by industry and the selection of healthier, lower calorie foods by consumers?

I would like to address the question of whether changes to the food label would result in the development of healthier low calorie food by the food industry by proposing this simple fact- the American people are already blessed with an abundant supply of healthy foods, which enables them to enjoy nutrient adequate diets that are the envy of the world. We would like to assert that America's current dietary problems including overweight and obesity are not the result of a lack of healthy low calorie foods but instead the result of individual choice and frankly consuming too much from an abundant supply of food.

The Sugar Association does not believe that further development of so called healthy low calorie food will solve this national problem and in fact could be counter productive.

A perfect paradigm is the request for the development of low fat food products. The food industry was very responsive to government and the nutrition communities call for the development of low fat version of many foods. Foods whether low in fat or low in carbohydrate must contain ingredients that mimic the functional properties of the original ingredients and provide similar texture and consistency as well as good taste to be eaten. A survey of many popular food items by Tufts University reported on in two recent articles in Tufts Health and Nutrition News Letter titled *Low Carb Craze or Low Carb Crazy* and *Sugar Free Shortcomings* illustrates that the low carb or sugar free versions were almost identical in calories as their full carb or sugar containing counterparts. This should send up a red flags from the lessons learned in the low fat craze. As with low fat the current emphasis on cutting carbs once again is missing the calorie message and gives the psychological message that it is okay to eat more.

Over the past several decades, foods once considered staples of the American diet such as eggs, milk, and butter have come under attack. Now rice, potatoes, and sugars are being

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labeled as potential sources of health problems. We would like to suggest that to encourage the development of new foods or food ingredients to replace proven foods and ingredients is not without potential long term health consequences. We offer trans-fat and decreased calcium intake as examples. The continued move away from our natural food sources may have implications for metabolism, satiety and taste preferences. The evidence is overwhelming that simply restricting one food item, ingredient or macronutrient does not work.

It is also a fact that many so called healthy foods are leading to weight gain simply because they are being consumed in portions that are in excess of what individuals needs to maintain a healthy weight. A nation wide educational effort by all stakeholders to assist the American public in understanding what is a proper portion size whether they are eating fruits, vegetables, dairy, grain, fast food or dessert would be a better use of current resources than another cycle of food development and revising the food label.

The diets of the American public are very diverse and so is the diversity of opinion among the academic and nutrition community as to what foods should be considered as part of a healthy diet. We think all will agree on one thing - the health of the American public will improve considerably if people stop eating too much food and increase their physical activity.

As President of the Sugar Association I must say a few words about sugar. One of the main arguments for changing the food label to include so called “added sugars” is the assertion that added sugars intake is a causative factor for obesity. This is not substantiated by science. In fact, every major review of the scientific literature exonerates sugars intake from any involvement in any disease including obesity. The most recent a 3-year, National Academy of Sciences (NAS) comprehensive review of the scientific literature citing 279 scientific references concluded,

- ◆ “Based on the data available on dental caries, behavior, cancer, risk of obesity, and risk of hyperlipidemia, there is insufficient evidence to set a UL (upper level) for total or added sugars”

The NAS, Institute of Medicine report states unequivocally,

- “There is no clear and consistent association between increased intakes of added sugars and BMI”

The continued emphasis on “added sugars” with the Dietary Guidelines, Food Guide Pyramid and the food label in the absence of a valid scientifically verifiable health implication, will only continue to obscure the real issue: if one consumes more calories – no matter the source – than one burns, weight gain is inevitable.

The Sugar Association believes that American consumers will be better served by nutrition advice that can withstand the scrutiny of collective scientific evidence, on the food label as well as all nutrition policy.

Thank you for your time and attention.