

INTERNATIONAL
**Food
Additives
Council**

1100 JOHNSON FERRY ROAD, SUITE 300 • ATLANTA, GEORGIA 30342
(404) 252-3663 • FAX (404) 252-0774 • E-mail: ifac@kellenccompany.com

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Norwegian Ministry of Health
postmottak@hod.dep.no

RE: Proposal to ban marketing of "unhealthy" food and beverages to children under 18 --
Beverages with added sugar and artificial sweeteners

The Calorie Control Council (the "Council") is an international association representing companies that make low-calorie foods and beverages and ingredients used in those products. Companies that make and use intense ("artificial") sweeteners are among the Council's members. The Council is herein providing comments on the proposal to ban in Norway the marketing of "unhealthy" foods and beverages to children under 18. Specifically, the Council is providing comments on beverages containing "artificial sweeteners."

There is no scientific justification to conclude that beverages containing "artificial sweeteners" are unhealthy for children or adults. Sweeteners used in such products are one of the most thoroughly studied groups of ingredients in the food supply. Scientists and regulators around the world agree that "artificial sweeteners" are safe. Additionally, with the increase in overweight and obesity worldwide, including children, intense sweeteners are an important tool that may be used to decrease overall caloric intake.

There have been numerous studies on low-calorie sweetener use, hunger, appetite, food intake and weight control, as well as a number of reviews of those studies. One of the first major reviews was undertaken by Barbara Rolls in 1991. She reviewed 45 studies concluding that "... there are no data suggesting that consumption of foods and drinks with intense sweeteners promotes food intake and weight gain in dieters."

In 1997 George Blackburn and his colleagues at Harvard University in the United States published the longest randomized control trial on low-calorie sweetener use and weight management. This is a two-year study in obese women. Half used aspartame and half were told to avoid aspartame containing products. Both groups experienced a 10% weight loss in the active phase of the study but the aspartame consuming group had significantly better weight maintenance two years later.

De la Hunty et al in 2006 reviewed 16 studies in which aspartame or aspartame with another low-calorie sweetener replaced sucrose and concluded "the meta-analysis

demonstrates that using foods and drinks sweetened with aspartame instead of sucrose results in a significant reduction in both energy intake and body weight.”

In 2007, under the auspices of “Family on the Move” which is a part of a larger program in the US known as “America on the Move,” a study in which sucralose was used to reduce the caloric content of the diet with the addition of 2000 steps a day was reported. Two-thirds of the participants lost or maintained weight. This study specifically addressed low-calorie sweetener use by children.

In a 2007 research review on energy density, satiety and the control of food intake with low calorie sweeteners, Bellisle and Drewnowski made a couple of very important points – low calorie sweeteners are not appetite suppressants, noting that in randomized control trials low-calorie sweeteners have been shown to be associated with modest weight loss. The ultimate effect of low-calorie sweeteners is dependent upon their integration into a reduced calorie diet.

This brings us to the conclusion of Mattes and Popkin who reviewed relevant research and reported in 2009 that “Taken together, the evidence summarized by us and others suggests that if Non-Nutritive Sweeteners are used as substitutes for higher energy yielding sweeteners, they have the potential to aid in weight management, but whether they will be used in this way is uncertain.”

The following quote from Adam Drewnowski of the University of Washington who has studied low-calorie sweeteners and the weight control issue for years is extremely important: “Consumers find it difficult to know who to believe. In the final analysis, all health experts agree that weight loss is best achieved by a combination of reducing caloric intake, lowering energy density of the diet, and increasing physical activity. By all accounts, low-calorie sweeteners do help. Suggesting that low-calorie sweeteners actually cause people to gain weight is an irresponsible direct application of rat models to dietary counseling and to public health.”

Importantly, on July 9, 2012, the American Heart Association and the American Diabetes Association released a joint statement concluding that substituting low-calorie sweeteners for sugars may help people reach and maintain a healthy body weight and, for people with diabetes, low-calorie sweeteners when used appropriately can aid in glucose control.

Thank you for considering the Calorie Control Council’s comments.

Respectfully submitted,



Haley Curtis Stevens, PhD
President

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