



INTERNATIONAL SWEETENERS ASSOCIATION

Norwegian Ministry of Health
Email: postmottak@hod.dep.no

Brussels, 17th August 2012

Dear Sirs,

RE: Norwegian ministry consultation on marketing of foods to children

I am writing to you on behalf of the International Sweeteners Association (ISA), representing manufacturers and users of low-calorie sweeteners, regarding the consultation of the Norwegian Ministry of Health and Care Services on a draft regulation to ban the marketing of energy-dense, nutrient poor foods and beverages to children under 18.

The ISA understands that the Ministry of Health's definition of foods identified as energy-dense and nutrient poor include "non-alcoholic beverages containing added sugar or sweeteners."

The ISA would like to provide the following comments regarding low-calorie sweeteners:

Foods and beverages containing low-calorie sweeteners can play a significant role in helping consumers reduce their energy intake, without compromising their enjoyment of a sweet taste. As you know, overweight, obesity and obesity-related diseases, such as diabetes type 2 and cardiovascular disease, are becoming an ever-increasing problem in today's society, which has serious implications for public health. Small reductions in body weight can lead to reduced risks of developing these diseases.

As shown in a meta-analysis review of evidence of the effects of low calorie sweeteners on weight loss, weight maintenance and energy intakes in adults,¹ there was a significant reduction in energy intake in consumers using low calorie alternatives. This resulted in a conservative weight loss of around 0.2 kg/week.

Furthermore, a recent study looking specifically at the impact of substituting added sugar in carbonated soft drinks by intense sweeteners in young adults² concluded "*the substitution of added sugar by intense sweeteners in carbonated soft drinks has beneficial effects on BMI*"

Low calorie sweeteners are suitable for diabetics, offering a sweet taste with no impact on insulin and blood sugar levels. Low calorie sweeteners are also tooth-friendly because they do not contain the simple carbohydrates that are necessary for dental plaque to form.

Thank you for considering these comments.

Yours sincerely,

Frances Hunt
Secretary General, ISA

¹ A review of the effectiveness of aspartame in helping with weight control, A. de la Hunty et al., 2006, British Nutrition Foundation Nutrition Bulletin, 31, 115-128

² Impact of substituting added sugar in carbonated soft drinks by intense sweeteners in young adults in the Netherlands: example of a benefit-risk approach, Marieke A. Hendriksen et al., Eur J Nutr, April 2010