

Feedback to Public Consultation on Possible Measures for Pre-Packed Sugar-Sweetened Beverages

Feedback on Possible Measures for Pre-Packed Sugar-Sweetened Beverages

No.	Section of Consultation	Questions	Recommendations
1	Possible SSB Measures	For views:	Reasons:
	 a. Enable consumers to make more informed choices when purchasing SSBs, through the introduction of a mandatory FOP nutrition label; b. Reduce influence of advertisements on purchasing and consumption decisions through restricting or banning advertisements for less healthy SSBs; c. Accelerate industry's reformulation efforts to reduce sugar content in SSBs, through an excise duty imposed on the industry; and 	Q1a: Do you agree that more should be done to complement the Government's current promotional and educational efforts, to reduce Singaporeans' sugar intake from SSBs? X Yes □ No	Q1b: Please state your reasons for your answer to Q1a. (Optional) Notwithstanding the sterling work that has been done so far to encourage Singaporeans to lead a more active life and to eat a balanced diet, more can certainly be done. Action should build on the existing, collaborative approach between government and industry. Collaboration should be widened to include all multipliers: clan and community centres, social clubs, the Inter-Religious Organization, schools, colleges and universities as well as chambers and trade associations. (This list is not exhaustive.)
	d. Discourage consumption of SSBs through a ban on sale of higher-sugar SSBs.		Government should consider mandating the provision of concise and unambiguous nutritional information across all food types. We do not favour FOP nutrition labels but are in favour of back of the pack (BOP) standardized nutrition labels to protect brands and intellectual property. This holistic approach is needed to ensure that consumers are aware of how much sugar is contained in SSBs and in all foods and beverages. Citizens and residents need to take personal responsibility for themselves and their families. Parents need, in particular, to take responsibility for their children. This is not the State's job.

			These messages need to be communicated but not preached in order to be effective. In terms of advertising, the government should continue its current, effective collaboration with industry which has resulted in industry commitments not to advertise to children. We are not in favour of draconian measures such as taxes or bans. The justification for these actions does not exist given the effective collaboration between government and industry which can be further enhanced and widened as argued above.
2	MANDATORY FRONT-OF-PACK NUTRITION LABEL To help consumers identify pre-packaged drinks with higher sugar content and/or poorer nutritional quality, so they can make informed and healthier choices. INTERNATIONAL EXAMPLES: Nutrient-specific label Nutrient-summary label Per 30g coreel La B D B UK's Traffic Light Label NUTRI-SCORE A B D B UK's Traffic Light Label France's Nutri-score Studies found that nutrient-summary labels are more effective as they are easier to understand.	Por Views: Q2a: Do you support having a mandatory FOP nutrition label on less healthy SSBs? ☐ Yes X No Q3a: Do you prefer a nutrient-specific, nutrient-summary or warning label? ☐ Nutrient-specific label (provides information on individual nutrients)	Reasons: Q2b: Please state your reasons for your answer to Q2a. You may cite relevant studies or information that supports this. (Optional) We are not in favour of FOP labels to protect brands and intellectual property. We are in favour of mandatory back of pack (BOP) standardized labels across all foods and beverages. One example would be the monochrome GDA (Guideline Daily Amount which could cover sugar, salt and fats). Q3b: Please state your reasons for your answer to Q3a. You may cite relevant studies or information that supports this. (Optional) Please refer to our response at Q2b.

		X Nutrient-summary label (provides a summary grade on overall nutritional quality of the product) U Warning label (only highlights products high in calories, saturated fat, sodium or sugar)	
3	Advertising regulations	For Views:	Reasons:
	ADVERTISING REGULATIONS To reduce the influence of advertisements of less healthy pre-packaged drinks on consumers, especially children.	Q4a: Do you support mandatory (i.e. not voluntary) restrictions on advertisements for less healthy SSBs to limit their influence on consumer preferences? ☐ Yes	Q4b: Please state your reasons for your answer to Q4a. You may cite relevant studies or information that supports this. (Optional) The justification for this proposed action does not exist given the current, effective collaboration between government and industry which should be ophageed and wideped as argued above.
	Expand current restrictions to more TV time belts and mass media channels • Current advertising guidelines in Singapore are voluntary and cover only limited channels. • Experts call for more comprehensive and mandatory restrictions as	<u>X No</u>	be enhanced and widened as argued above. More should be done by all stakeholders educating consumers on the dangers of hi consumption of less healthy SSBs and all le healthy food and beverage options. The indus has already taken measures and continues implement and develop SSBs with lower sugcontent.
	children are increasingly exposed to advertisements from a wider range of sources.	Q5a: Do you prefer to expand current restrictions or impose a ban on advertisements for less healthy SSBs?	Q5b: Please state your reasons for your answer to Q5a. You may cite relevant studies or information that supports this. (Optional)
		 □ Expand current advertising restrictions □ Impose a ban on advertisements for less healthy SSBs 	Q5a is not relevant. The industry is already reformulating their drinks.

4	Excise duty on manufacturers and importers	For Views:	Reasons:
	EXCISE DUTY ON MANUFACTURERS & IMPORTERS OF PRE-PACKAGED SSBs To encourage industry to reformulate and lower sugar content in their drinks.	Q6a: Do you support having an excise duty on pre-packaged SSBs to be levied on manufacturers/importers to encourage them to reduce sugar content in their drinks? ☐ Yes	Q6b: Please state your reasons for your answer to Q6a. You may cite relevant studies or information that supports this. (Optional) The justification for this proposed action does not exist as the industry is already collaborating with
	EXAMPLE: UK'S TWO-TIERED EXCISE DUTY:	X No	government to reduce the sugar content of SSBs. A more holistic approach is preferred where standardized BOP nutrition labels are mandated
	LOWER DUTY TIER 2.5 TSP SUGAR OR MORE £0.04 per packet • UK's duty saw over 50% of manufacturers reducing sugar content in		for all foods and beverages to allow consumers to make informed choices.
	their drinks, and an increased variety of lower-sugar pre-packaged sugary drinks in the market. • A tiered duty provides more targets for manufacturers to progressively lower sugar levels in their products.	Q7a: Do you prefer a flat or tiered excise duty on pre-packaged SSBs? ☐ Flat (i.e. same duty rate for all SSBs with	Q7b: Please state your reasons for your answer to Q7a. You may cite relevant studies or information that support this. (Optional)
		sugar levels beyond a certain threshold) □ Tiered (i.e. more than 1 duty rate, with a lower duty rate for SSBs with lower sugar level)	Q7a is not relevant. Please see our response at Q6b.
5	Ban on sale of higher-sugar SSBs	For Views:	Reasons:
		Q8a: Should we impose a ban on the sale of higher-sugar pre-packaged SSBs? ☐ Yes X No	Q8b: Please state your reasons for your answer to Q8a. You may cite relevant studies or information that support this. (Optional) We do not support draconian measures of this sort as the justification for this proposed action
			does not exist given the existing collaborative approach between government and industry.

NATIONWIDE BAN ON SALE OF PRE-PACKAGED HIGHER-SUGAR DRINKS To discourage consumption among Singaporeans.



- Currently, drinks with more than 3 tsps of sugar cannot be sold in schools and on government premises.
- Major manufacturers also pledged to remove drinks with more than 6 tsps of sugar.
- A nationwide ban on higher-sugar drinks can build on current efforts and further reduce overall sugar intake.

Significant progress has been made precisely because the government has adopted a collaborative approach with industry. Those gains can be built on by enhancing and widening that collaboration as argued above.

6 Conclusion

A whole-of-society effort is needed to advance our War on Diabetes. Individuals should be empowered to take charge of their own health, and the Government, businesses and community-at-large can help by creating a more conducive environment for healthy living. MOH welcomes views on the following possible measures to reduce Singaporeans' sugar intake from pre-packaged SSBs:

- a. Mandatory FOP nutrition label;
- b. Advertising regulations;
- c. Excise duty on manufacturers and importers; and

For Views:

Q9: Apart from the possible measures outlined in this paper, are there other measures that you would like MOH to consider to reduce sugar intake in Singapore?

Reasons:

You may cite relevant studies or information that support your suggestion(s). (Optional)

The whole of society should continue to be educated and mobilized on the consequences to their quality of life by consuming large quantities of SSBs and all foods and beverages which contain high levels of sugar whether added or naturally occurring. This should form part of public health education which includes the messages that leading an active life combined with a well-balanced diet will help preserve the quality of life and reduce medical costs.

Simply regulating pre-packaged SSBs will not deter consumers from reducing their sugar intake but will only encourage them to look for

d. Ban on sale of higher-sugar SSBs.		alternatives. This is why a holistic approach with standardized BOP labelling for all foods and beverages should be mandated. This will allow consumers to make far better-informed choices than they currently can. Communication of these messages needs to be sophisticated and avoid unintended condescension and preaching neither of which are effective. The best way to is build on the collaborative approach with industry which has been effective and to widen it as argued above.
General Comments Q10: Please include any other comments you would like	IOH to take into account (Ontional)	