



WHO draft guideline: use of non-sugar sweeteners – consultation response

Instructions

overall clarity, any potentially missing information, setting-specific or contextual issues, considerations and implications for adaptation and implementation of the guideline, and additional gaps in the evidence to be addressed by future research

summary of evidence – page 20

Clear and concise. Thank you.

evidence to recommendations – page 32

Clear, important, proportionate and achievable. Thank you.

Additional suggestions on potential government actions, reflecting on the UK context (informed by this 2019 report [Sweeteners-spread.indd \(squarespace.com\)](#) and observations of current policy and practice as outlined below).

- Explicit mention that Governments should consider discouraging the addition of NNS as a part of product reformulation.
- Governments should consider monitoring and reporting of NNS use in food production.
- Governments should collect data on NNS consumption (intakes and dietary sources beyond NNS soft drinks) among infants, young children, pregnant and breastfeeding women through national dietary surveys.

A current focus in policy and practice in the UK in the food/nutrition sector is tackling the marketing of High saturated Fat, Salt and Sugar (HFSS) foods/drinks and reducing their consumption. This focus is primarily among adolescents and adults, with little in the way of action on infants and young children. While this is important, First Steps Nutrition Trust's concern is that this is happening in the absence of any associated efforts to consider the possibly perverse effects this may have in terms of increased use and consumption of NSS and also inadvertent promotion of highly processed foods and drinks. For example in early 2022 the DHSC launched a 'Food scanner' App which is being widely promoted to families and through schools, and which suggests 'healthier' swaps for HFSS foods and drinks, and these swaps include, for example, NNS fizzy drinks, which are given a 'good choice' label.

It should be noted that there are currently no public health or dietary recommendations which make explicit mention of the level of processing of foods, which we believe is an important limitation in the context in which actions may be needed to reduce NNS consumption alongside free sugar consumption.

recommendations and supporting information – page 39

Suggest that additional gaps in the evidence to be addressed by future research should include:

- The impact of NNS beverages on the oral health of infants and young children
- The impact of NNS consumption in infancy and early childhood on the child's palate and sweet preference in later life.

other comments

We feel it would be of value to consider alongside health outcomes of NSS consumption, their effects on taste preferences, if sufficient data are available. Two studies which contain some data on this are:

Goran M.I., Plows J.F., Ventura E.E. (2018) Effects of consuming sugar and alternative sweeteners during pregnancy on maternal and child health: evidence for a secondhand sugar effect. *Proc Nutr Soc*, 78 (3), 262-271.

Zhang G.H., Chen M.L., Liu S.S., Zhan Y.H., Quan Y. et al (2011). Effects of mother's dietary exposure to acesulfame-k in pregnancy or lactation on the adult offspring's sweet preferences. *Chemical Senses*, 38 (9), 763-770.