

23 September 2014

Food Standards Australia New Zealand

Email: submissions@foodstandards.gov.au

Dear Sir/Madam,

Health Claims – Formulated Supplementary Sports Foods and Electrolyte Drinks

Yarra Ranges Council is writing in response to the proposal to permit electrolyte drinks and drink bases (EDs) to carry health claims related to their purposes. Council's concern is that allowing increased use of health claims in the labelling of these drinks will make them seem healthier, and thus more appealing, to people who do not actually need the high level of sugar in these drinks.

One of the priorities in Council's Health and Wellbeing Strategy is "*Healthy Places, Healthy People*". The goals under this priority include:

- Increase understanding, access and consumption of healthy food; and
- All people in our community enjoy high levels of oral health.

Inappropriate consumption of sweetened EDs which would have a minimum sugar level imposed, would work against these goals.

These drinks have a high level of sugar and are not considered appropriate as part of a healthy diet for the average person as compared to elite or active sports people. The Australian Beverages Council itself has acknowledged that EDs are suitable for people who engage in "intensive exercise"¹. If the code is changed to allow EDs to carry health claims, our concern is that the average consumer will not be sufficiently aware that EDs are only suited to people exercising intensively.

There is extensive evidence linking the consumption of sugary drinks with a range of health diseases. In Australia, dietary risks – including a diet high in sugar-sweetened beverages accounted for 10.5% of the total burden of disease in 2010, compared to a 9.3% global average. This makes dietary risks our number one risk factor for ill health.² Standard EDs such as Gatorade and Powerade contain approximately 40% of recommended daily intake (RDI) for sugar, and the proportion of the RDI would be much higher for a child.³

¹ <http://www.abc.net.au/news/2014-09-23/obesity-group-concerned-over-sports-drink-labelling-changes/5760778>

² <http://vizhub.healthdata.org/gbd-compare/>

³ <http://www.news.com.au/lifestyle/food/why-so-called-healthy-drinks-are-really-as-bad-as-soft-drink/story-fneuz92c-1226748659979>; <http://www.rethinksugarydrink.org.au/how-much-sugar>

In September 2013, 4.2% of our residents had diabetes; the level ranges from a low of 2% in Sassafras in the Hills, to 5% in our disadvantaged outer eastern postcodes.⁴ In 2008, 51% of residents were overweight or obese, compared to 47% for Melbourne. By 2012, 58% of our residents were overweight or obese, compared to 50% across Victoria.⁵

Poor health status related to dietary risks is thus a major concern for our local area.

The preference of Yarra Ranges Council would be that, any changes to labelling, include a high level of prominence be given to the fact that sports drinks are only a requirement for people undertaking prolonged and strenuous exercise, rather than light to moderate exercise or as a standard drink choice.

Finally, in the USA replacing sugary drinks with water has formed a key plank of a campaign to reduce childhood obesity (in New York City). Part of the rationale for this multi-pronged strategy is the escalating cost to the community of obesity and related diseases. The proposal around EDs is going in the wrong direction in terms of reducing the burden of chronic illnesses related to consumption of excess sugar.

For further information, please contact Council's Social Planner, Cathi Walker on 9294 6113.

Yours sincerely



Director Social and Economic Development

⁴ <http://www.ndss.com.au/en/Research/Australian-Diabetes-Map/Map/>

⁵ Source: Yarra Ranges Health Profile 2013 and unpublished data from the Victorian Population Health Survey 2012