

Overview of Added Sugars as Defined by the FDA



Introduction

As part of updated labeling rules aimed at helping consumers reduce excess sugar intake, the United States Food and Drug Administration (FDA) first required “Added Sugars” on the Nutrition Facts label in 2016, with full compliance required by 2021 for most manufacturers. Prior to this change, labels only listed “Total Sugars,” without distinguishing between naturally occurring and added sources.¹ Understanding how the FDA defines added sugars, what counts and what does not, and how these sugars are reflected on product labels ensures accurate and transparent consumer communication. Failure to do so will result in lost consumer trust and civil or criminal penalties, depending on whether the product was unknowingly or intentionally mislabeled. These details are outlined in the Federal Food, Drug, and Cosmetic Act of 1938,^{2,3} Section 331(b),^{4,5} Section 333(a),^{6,7} and Section 343(q).^{8,9}

FDA Definitions and Guidance¹⁰

Added Sugars: Sugars added during the processing of foods, or packaged as such. Includes sugars from syrups, honey, and concentrated fruit or vegetable juices in excess of what is naturally found in 100% juice.

Not Added Sugars: Naturally occurring sugars such as those in whole fruits, vegetables, milk (lactose), and 100% fruit or vegetable juice (when not concentrated).

FDA Labeling Rule: On the Nutrition Facts label, added sugars must be listed separately under ‘Total Sugars’ as ‘Includes [Number] g Added Sugars.’

Key Consideration: If the ingredient’s purpose is to sweeten, and it does not occur naturally in that form in the food, it likely qualifies as added sugar.

EXAMPLES: WHAT COUNTS AS ADDED SUGAR

- White sugar, brown sugar, “raw” sugar
- Honey, maple syrup, agave nectar, molasses
- High-fructose corn syrup (HFCS), corn syrup, rice syrup
- Coconut sugar, maltose, dextrose, glucose, fructose (when isolated and added back to product formulations)
- Fruit or vegetable juice concentrates when used as sweeteners (e.g., apple juice concentrate included in cereal formulations)
- Sugars added during processing such as in yogurt, baked goods, condiments, or sauces

EXAMPLES: WHAT DOES NOT COUNT AS ADDED SUGAR

- Sugars in whole fruits and vegetables
- Lactose in milk and unsweetened dairy
- 100% fruit or vegetable juice (not concentrated or appropriately diluted)
- Fruit purees used as fruit, not as a sweetener
- Concentrated juice when diluted back to 100% juice standards

A

Nutrition Facts	
about 4 servings per container	
Serving size	1 Pouch (85g)
Amount per serving	
Calories	90
% Daily Value*	
Total Fat 1.5g	2%
Saturated Fat 1g	5%
Trans Fat 0g	
Cholesterol 5mg	2%
Sodium 50mg	2%
Total Carbohydrate 15g	5%
Dietary Fiber 0g	0%
Total Sugars 14g	
Includes 8g Added Sugars	16%
Protein 4g	
Vitamin D 1mcg	6%
Calcium 150mg	10%
Iron 0mg	0%
Potassium 200mg	4%
* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.	
INGREDIENTS: CULTURED REDUCED FAT MILK, CANE SUGAR, STRAWBERRY PUREE CONCENTRATE, PECTIN, TAPIOCA STARCH, NATURAL FLAVORS VITAMIN D3.	
CONTAINS: MILK	

B

Nutrition Facts	
about 4 servings per container	
Serving size	1 Pouch (85g)
Amount per serving	
Calories	70
% Daily Value*	
Total Fat 2.5g	3%
Saturated Fat 1.5g	8%
Trans Fat 0g	
Cholesterol 10mg	3%
Sodium 65mg	3%
Total Carbohydrate 8g	3%
Dietary Fiber 0g	0%
Total Sugars 5g	
Includes 0g Added Sugars	0%
Protein 4g	
Vitamin D 1mcg	4%
Calcium 146mg	10%
Iron 0mg	0%
Potassium 223mg	4%
* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.	
INGREDIENTS: CULTURED PASTEURIZED ORGANIC WHOLE MILK, ORGANIC BANANA PUREE, PECTIN, ORGANIC NATURAL FLAVOR, ORGANIC NATURAL VANILLA FLAVOR, NATURAL FLAVOR, VITAMIN D3.	
CONTAINS: MILK	

Figure 1

Comparison of two strawberry yogurt nutrition labels. Label A represents a strawberry yogurt formulated with added sugar, while label B represents a strawberry yogurt formulated without any added sugar.

Figure 1 compares two strawberry yogurt nutrition labels, one with added sugars (A), and one without added sugars (B). Using the rules listed above, the added sugars in Yogurt A originate from cane sugar and strawberry puree concentrate.

- The cane sugar is an added sugar because any form of crystalline sugar is treated as an added sugar
- The strawberry puree concentrate is an added sugar because it is a concentrate, even if it is a fruit puree

Yogurt B has zero added sugar on the label because

- There is no added crystalline sugar
- The banana puree used is a simple, unconcentrated fruit puree (as compared to the concentrated strawberry puree used in Yogurt A)

Note that in both cases, the naturally occurring milk sugar, lactose, is not considered an added sugar and thus is not counted towards the final total of the added sugars for either formulation.

For more detailed information, refer to the FDA's guidance on added sugars and nutrition facts labeling requirements.

This document provides the most current information at the time of its publication, and is intended to provide guidance only. Readers should contact AURI or another regulatory professional for the latest information when finalizing any product label details.

References

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