

**Submission from Cancer Society of New Zealand to
Food Standards Australia New Zealand on Proposal P1030
Health Claims – Formulated Supplementary Sports Foods and Electrolyte Drinks**

30 September 2014

Thank you for the opportunity to make a submission on Proposal P1030.

The Cancer Society of New Zealand (Inc.) (Cancer Society) is a non-profit organisation which aims to minimise the incidence and impact of cancer on all those living in New Zealand. We work across the Cancer Continuum (2003, New Zealand Cancer Control Strategy, Ministry of Health) with key work streams that include: provision of Supportive Care; Information; funding of Research; and Health Promotion (www.cancernz.org.nz).

Much of the work of the Cancer Society in Health Promotion involves national advocacy for legislative and regulation change for Tobacco Control, Skin Cancer Control and improved Physical Activity and Nutrition.

Under the nutrition category we support increased pricing and tighter marketing of Sugary Sweetened Beverages (SSB)¹ as an unnecessary contributor to weight gain. Similarly we are concerned that many consumers are **unnecessarily** consuming electrolyte drinks (ED) which can contain large amounts of sugar thinking they are a ‘healthier choice’ than SSB.² Our Health Promotion Agency (HPA) states that one generic 750 ml ED bottle contains 15 teaspoons of sugar, one 600 ml soft drink contains 16 teaspoons of sugar and one 350ml energy drink contains 9 teaspoons of sugar³. Hence, all three drink categories can be high in sugar and therefore contribute to weight gain.

Being overweight or obese increases the risk of cancers of the oesophagus, pancreas, bowel, breast (in post-menopausal women), endometrium and kidney.⁴ Latest statistics show that 65% of New Zealand adults are overweight or obese.⁵

We recommend water as the healthiest and best drink option.

We consider ED are unnecessary and too readily available and promoted for the majority of New Zealanders. We understand that your own research has found that consumers

¹ New Zealand Beverage Guidance Panel [Policy Brief: Options to reduce sugary sweetened beverage consumption in New Zealand](#); June 2014

² Outram SM, Stewart B. Should nutritional supplements and sports drinks companies sponsor sport? A short review of the ethical concerns. J Med Ethics. September 2014

<http://jme.bmj.com/content/early/2014/07/29/medethics-2014-102147.full.pdf+html>


³ <http://www.hpa.org.nz/nutrition-physical-activity-resources>

⁴ World Cancer Research Fund, American Institute for Cancer Research, Food, nutrition, physical activity, and the prevention of cancer: a global perspective. Washington DC: AICR; 2007.

⁵ <http://www.health.govt.nz/our-work/diseases-and-conditions/obesity>

like ED taste and use ED when they are feeling flat or lethargic.⁶ This ‘misuse’ has the potential to result in continued and increased consumption of ED contributing to increased weight gain at a population level. This contributes to increased cancer risk as consumers drink ED because they like them and mistakenly think they’re a ‘healthier option’ than SSB (or other carbohydrate containing drinks) and can (falsely) believe that ‘more is better’ not realising how much sugar they can contain.

In conclusion, the Cancer Society does **not support** Proposal P1030. Additionally ED (like any other beverage/food) should meet the Nutrient Profiling Scoring Criteria (NPSC) if they were to make a health claim. ED should **not be exempt** from the NPSC.


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⁶ Hoey M. Consumer research investigating the use of formulated supplementary sports foods. Canberra: Food Standards Australia New Zealand: 2010.