



GFORSS

GLOBAL FOOD REGULATORY  
SCIENCE SOCIETY



UNIVERSITÉ  
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# CHALLENGES RELATED TO RISK COMMUNICATION ASSOCIATED WITH SUGAR SUBSTITUTES IN FOOD

*International Best Practices on the Review  
and Approval of Food Additives*

*28 May 2024 • Cairo, Arab Republic of Egypt*

*Reviewing Some Challenges Related to  
Communication Associated with the  
Approval and Use of Sugar Substitutes*

*Learnings and Perspectives*



# Risk Communication is a Key Component of Risk Analysis <sup>3</sup>

## Pillars of a Robust Food Control System



□ **Risk Communication** refers to the **interactive exchange of information and opinions throughout the risk analysis process** concerning hazards and risks, risk-related factors **and risk perceptions, among risk assessors, risk managers, consumers, industry, the academic community and other interested parties,** including the explanation of risk assessment findings and the basis of risk management decisions.



# Food Additives

**Any substance not normally consumed as a food in itself and not normally used as a typical ingredient of the food, intentionally added for a technological purpose** (*adapted from Codex GSFA*)

Only those that have undergone JECFA assessment and **are found not to present an appreciable health risk to consumers** can be used internationally:

1. Safety assessment conducted by JECFA
2. Maximum use levels established in Codex GSFA
3. Development of national regulations permitting use of additive

Additives are Associated with a Perception of Risk



## Additives are Chemicals

- ❑ Some of Very Common Occurrence – e.g., Citric Acid
- ❑ We Forget that Chemicals Do Occur in Food
  - E.g. Hydroquinone (1,4-Benzendiol) is a natural constituent in pears, wheat, tea and coffee, rice, onions, cranberries and blueberries
    - Major Source of Exposure (low levels not triggering any negative effects)
  - Yet Taken individually:
    - The EU classified hydroquinone as both carcinogenic and mutagenic.
    - There is sufficient in vitro evidence to conclude that hydroquinone is genotoxic, however, only limited in vivo evidence.



# The Issue – Hazard vs Risk?

**HAZARD**



**RISK**



The Difference is the **EXPOSURE!**

# Key Concept – Hazard vs Risk?

**HAZARD**

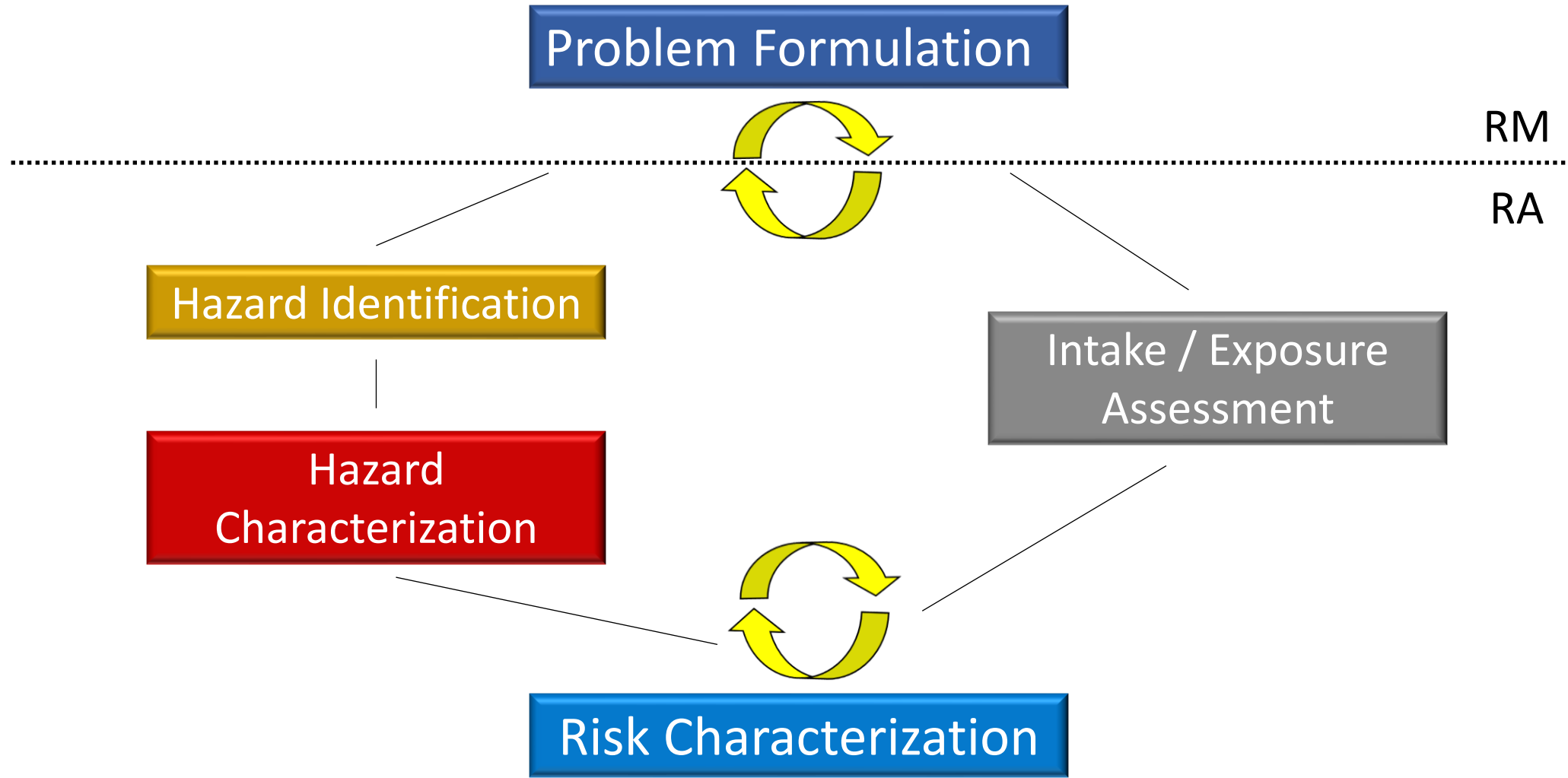
**RISK**



The Difference is the EXPOSURE!



# Risk Assessment Procedure: A Scientific Process

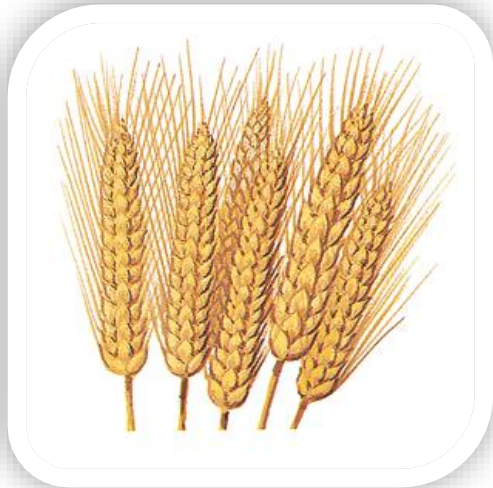


**Substances Present in Food  
Should NOT lead to Health Risks  
(when consumed through food)**



# We Consider Exposure in Risk

Occurrence of  
Food Chemicals



Food  
consumption



# We Consider High Consumption Scenarios

- ❑ Within a risk assessment process, mean consumption levels are often not sufficient
- ❑ It is fundamental to consider also non-average individuals, in particular **high consumers**
  - Those who consume relatively large quantities of foods



## ☐ Scientists Consider Different Scenarios of Exposure:

- Generally 97.5<sup>th</sup> percentile for consumers

## ☐ Risk Assessment Considers Extreme scenarios



# Various Target Populations Are Considered



Adult population



Pregnant women



Small children



Infants



Elderly

**Special groups:**  
vegetarians, diabetics,  
ethnic groups and  
different socio-economic  
strata ...

**But This Does NOT Seem to be Enough to Prevent  
Mis-Communication and Controversies!**

**The Case of Sugar Substitutes**

# Non-Sugar Sweeteners

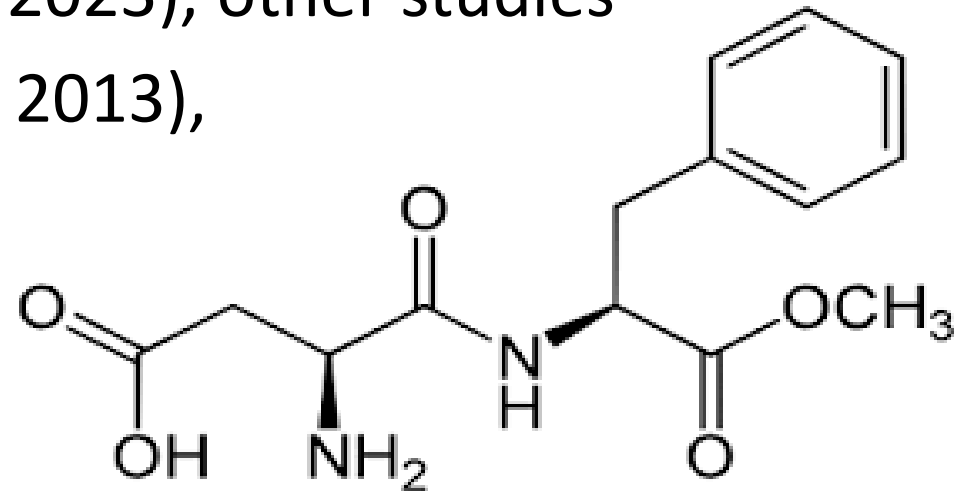
- ❑ High sweetness, low calorie, used in very small quantities
- ❑ Acesulfame K, aspartame, cyclamates, saccharin, sucralose, steviol glycosides...
- ❑ Different chemical structures
- ❑ Extensively studied for genotoxicity and carcinogenicity effects – no evidence of risk when approved as a Food Additive





# Aspartame

- ❑ One of the most studied substances in the food supply
- ❑ ADI (mg/kg bw): 0-50 (FDA), 0-40 (JECFA, SCF, EFSA)
- ❑ Remains controversial despite sound evidence of its safety
  - No genotoxic potential: EFSA (2013), systematic literature reviews (Magnuson et al., 2007; Lea et al., 2021; Pavanello et al., 2023), other studies
  - No carcinogenic potential: EFSA (2006, 2009, 2013), FDA (2017), systematic literature reviews (Haighton et al., 2019; Wikoff et al., 2020; Pavanello et al., 2023), other studies



# Risk Communication Challenge – Part 1

- ❑ Approved for use in food & drinks early 1980s
- ❑ July 2005 Ramazzini study: aspartame causes cancer in rats
  - Presented in Ramazzini-led press conference, journal (not peer-reviewed) and scientific conference
  - International media frenzy
  - Data published **WAS INCOMPLETE**
  - After several requests, Ramazzini submits data to Food Regulators
  - Data Submitted was incomplete
    - No pathology slides (EFSA)
  - This has even led to Politization of the Debate (UK)



# Media Amplification and Confusion (2005-06)

HEALTH: WEBMD

## Study Links Aspartame To Cancer

July 28, 2005 / 6:53 PM EDT / WebMD

Artificial sweetener causes cancer in rats at levels currently approved for humans, new study suggests

Date: February 13, 2006

## | MP calls for total ban on 'cancer' sweetener

### Fresh fears raised about aspartame

#### Manufacturers dispute study into lab rats fed sweetener

The European **Food** Safety Authority is reviewing "as a matter of high priority" the results of a large new study into aspartame, the artificial sweetener consumed by millions of people worldwide and used in more than 6,000 food and drink products.

NEWS

HEALTH & MEDICINE

### Not So Sweet: Cancers in rats that consumed aspartame



# Media Amplification – Analysis

## □ Why ??? Triggers

- Cancer risk
- Consumed by millions of people worldwide
- Bias: Used by large corporations in the food industry

## □ Vacuum of Information for 10 Months

- May 2006 EFSA report: no cancer concerns
  - Press conference and publication of full report on official website
  - Significant press coverage

## □ But damage was already done

- Industry losses, negative image
- Consumers misled by 10 months of misinformation

### **Sweetener's 'link to cancer' denied**

By SEAN POULTER, Daily Mail  
Last updated at 14:17 15 July 2005

The artificial sweetener aspartame, which is used in 6,000 diet food and pharmaceutical products, has been linked to cancer.

The additive - also known as NutraSweet - is found in Diet Coke, Candarel, Pepsi Max, Ribena Light, Muller Light strawberry yoghurt, Wrigley's Extra Spearmint chewing gum and many other products.



# Lessons Learned

## Communication and Dissemination of Science Results (extracted from Lofstedt, 2008)

*Good practices*



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Scientific peer-review journal  
Share data with regulators  
Dialogue with regulators  
Openness regarding funders  
Few if any press conferences  
Publish in best peer-review journals  
Proper risk communication

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*Ramazzini*



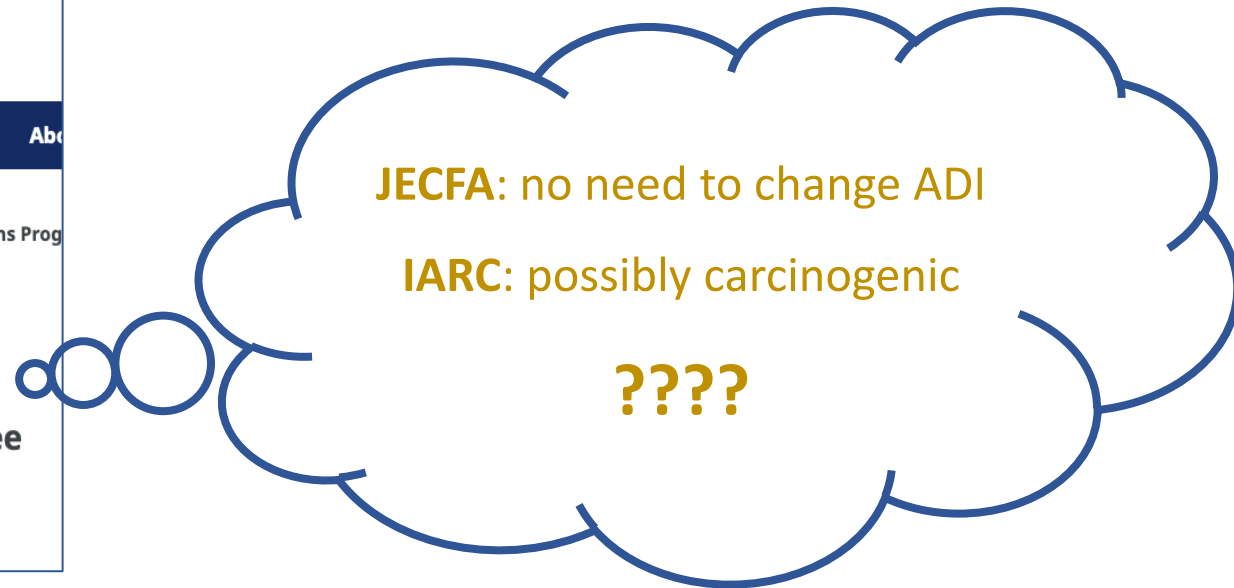
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General media  
Keep data secret  
Little dialogue with regulators  
Secrecy regarding funders  
Many press conferences  
Many non-peer-review journals  
Faulty risk communication

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# More Recently.....2023

- ❑ JECFA scheduled aspartame reassessment for July
- ❑ IARC decides to develop a monograph
- ❑ Results published simultaneously by WHO in July



# More Recently.....2023 (continued)

## IARC

- conducts **hazard** assessments
- Different Approach of Selection of Experts (than JECFA)

International Agency for Research on Cancer



## JECFA

- WHO/FAO Expert Body
- Codex official body to assess additives based on **risk** (safe dose/limit)
- Independent and Global Reference for Risk Assessment



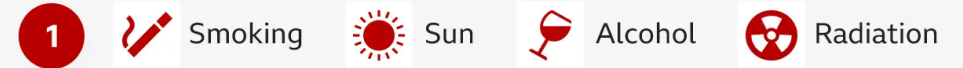
# IARC study

- ❑ IARC uses 4 possible classifications
- ❑ Aspartame has been moved to “possibly carcinogenic”
  - 3 studies, connection to liver cancer
- ❑ “Possibly” refers to the strength of the scientific evidence
- ❑ IARC: "evidence was not of sufficiently high quality or convincing enough" and "this is really more a call to the research community"

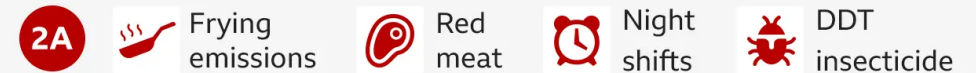
## What is known to cause cancer in humans?

Rankings based on how much evidence there is from high to low

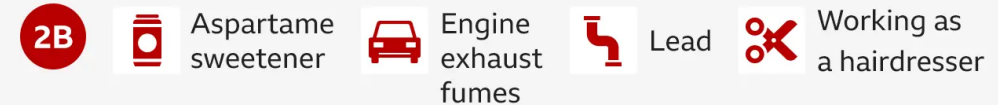
### Causes cancer



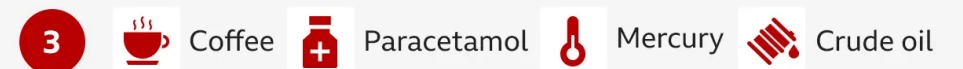
### Probably causes cancer



### Possibly causes cancer



### Not enough evidence it causes cancer



Source: The WHO's International Agency for Research on Cancer





# JECFA Assessment

*Based on cancer risk and other issues*

*(e.g., heart disease, type 2 diabetes)*

*ADI unchanged*

## How much aspartame is safe?

The WHO recommends daily consumption of less than the equivalent of:



**17 cans\***

Average UK man  
(85kg / 13st 5lb)



**14.4 cans**

Average UK woman  
(72kg / 11st 5lb)



**6.4 cans**

Average 10-year-old  
child (32kg / 5st 1lb)



\*Based on each can containing 200 mg of aspartame, although some drinks contain more

Source: World Health Organization and NHS Digital

BBC

# Media Amplification (2023) – Déjà Vu

HEALTH / PUBLIC HEALTH

**The WHO declared aspartame “possibly” causes cancer. Here’s what that means.**

Get ready for an earful about the health risks of Diet Coke, Trident gum, Equal, and other sugar-free items.

**Food additive added to thousands of products is a possible cancer-causing chemical**

**Most Popular Chewing Gums Contain This Cancer-Causing Sweetener, Chew On This Instead**

**WHO declares widely used sweetener aspartame a possible cancer cause, but intake guidelines stay the same**

**Cancer: Artificial sweeteners linked to greater risk of cancer – 'consumed by millions'**

# Overall Analysis

- Trigger of Assessment or Re-Assessment
- Studies Not Issued by Authoritative Bodies
- Difficulty to Position Results: What Does it Mean for Consumers?
- Amplification of Message: Social Media and Beyond
- Need for Concerted Action
- Need for Common Messaging



# Where Do We Go From Here .... ?

## Some of the Guidance From Lessons Learnt and Research:

From Lofstedt (2008) <https://link.springer.com/article/10.1057/rm.2008.11>

- ❑ Academics, regulators and the media need to work together in developing responsible and credible risk communication strategies.
- ❑ Research organizations should in close collaboration work with policy makers to develop uniform scientific data with agreed-upon disclosure guidelines

# Overall Future Direction

- ❑ Risk should be communicated correctly and **responsibly**
- ❑ Not a one-way form of persuasion;
- ❑ should help consumers make better choices (Fishchhoff, 1995; 2007; Lofstedt, 2010)
- ❑ Learnings from Previous Experience
- ❑ Following Codex Guidance:



“The **interactive exchange** of information and opinions concerning risk among risk assessors, risk managers and other interested parties”

- ✓ **Concerted and Collaborative Action**
- ✓ **Leadership from Authoritative Sources**
- ✓ **Keeping a Momentum: Overcome “Being Drowned by Noise”**
- ✓ **Continued Learning and Improvement**

