

The Coca-Cola Company

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February 7, 2020

Barbara Schneeman, PhD
Chair, 2020 Dietary Guidelines Advisory Committee
c/o Kristin Koegel, MBA, RD
Center for Nutrition Policy and Promotion, Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 1034
Alexandria, VA 22301

ATTN:

Carol Boushey, PhD, MPH, RD
Chair, Dietary Patterns Subcommittee

Regan Bailey, PhD, MPH, RD
Chair, Data Analysis and Food Pattern Modeling Cross-Cutting Working Group

Elizabeth Mayer-Davis, PhD, RD
Chair, Beverages and Added Sugars Subcommittee

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Re: Meetings: 2020 Dietary Guidelines Advisory Committee (Docket No. FNS-2019-0001)

Dear Dr. Schneeman and members of the 2020 Dietary Guidelines Advisory Committee (“DGAC,” “the Committee”),

The Coca-Cola Company is pleased to submit these comments in response to the 2020 DGAC’s request for comments regarding the development of the 2020-2025 *Dietary Guidelines for Americans* (“DGA”).

Over the last few years, Coca-Cola has been transforming to become a total beverage company that meets Americans’ fast-changing preferences across a wide array of beverage categories. We support the World Health Organization’s recommendation that people should limit added sugar to no more than 10% of their total daily calorie consumption¹ and are rethinking existing recipes, package sizes and offerings to ensure we are helping consumers manage their daily intake of added sugar and other nutrients from our portfolio.

Today, we offer more than 800 drinks in the U.S. alone, ranging from soft drinks to juices, teas, coffee, dairy, sports drinks, water and more – more than 250 of which are low- or zero-sugar options. More than 40% of our sparkling beverage brands in the U.S. are now available in package sizes that are smaller than 8.5 ounces. We are increasing marketing support for low-sugar, no-sugar and unsweetened products like

Gold Peak unsweetened tea, Honest Kids, Coca-Cola Zero Sugar, AHA sparkling water, Simply Light and Powerade Zero; we are introducing less sweet versions of classic soft drinks like Fresca; and we are accelerating our expansion into new beverage categories through the acquisition of brands like fairlife (one of the country's fastest-growing value-added dairy brands) and the introduction of new innovations like Odwalla Smoobuchas and Honest Cold Brew coffees and teas.

We are taking these actions because we recognize the critical role that we – and the entire industry – can play in advancing nutritional goals by using our scale for good. We are proud to be an active participant in industry efforts to help Americans consume less sugar from beverages through our work with the American Beverage Association and the Alliance for a Healthier Generation, which aims to reduce beverage calories consumed per person nationally by an additional 20% by 2025. We fully support the total diet approach to healthy eating and the development of science-based beverage recommendations through the DGA process that would provide a helpful framework for Americans as they consider the role of beverages in their overall diets.

I. Why Beverage Guidance is Needed in the Dietary Guidelines for Americans

Coca-Cola commends the 2020 DGAC's work to intentionally review the role of beverages in the diet, and we encourage the Committee to expand on beverage recommendations made in previous DGA. In this letter, we are pleased to provide the Committee with a suggested framework based on existing science, authoritative reports and global dietary guidance (pages 5-9).

The need for expanded beverage guidance is supported by the draft conclusions presented by the Data Analysis and Food Pattern Modeling (DAFPM) Cross-Cutting Working Group at the last DGAC meeting. These conclusions demonstrate that beverages contribute significant calories and nutrition to the diets of Americans. Key DAFPM findings include:

- About 15% of energy comes from beverages
- Beverages, such as sweetened soft drinks, coffee and tea contribute more than 40% of daily added sugar intake
- Beverages, mainly milk and 100% juice, contribute over 40% of vitamin C and D intake and more than 20% intake of carbohydrates, calcium, potassium and magnesium
- Fruit intake (0.9 cup/day) is half of recommended levels (2 cups/day); 100% fruit juice contributes up to 24% of fruit intake in children, but decreases after adolescence
- Coffee and tea contribute up to 12% of potassium intake in adults
- Waters contribute up to 10% of calcium intake in adults

Despite these contributions, beverages are not featured prominently in dietary patterns discussions and recommendations. For example, while the 2015 Healthy U.S.-Style Eating Pattern notes some beverages as part of food groups (e.g., milk in dairy group, 100% juice in fruit group), other beverages, such as coffee, tea, water and plant-based beverages are mostly absent. And, in the 2015-2020 DGA, there are few modeled examples of how these recommended dietary patterns come to life using real food and beverage choices.²

Similarly, the first draft conclusion of the 2020 Dietary Patterns (DP) Subcommittee broadly states that patterns strongly associated with a reduced mortality risk include vegetables, legumes, fruits, nuts, whole grains and fish. As DGA nutrition guidance evolves to take a more holistic view of eating patterns and food groups, beverages should be included alongside foods to recognize their impact on nutrient intakes

and health. A November 2019 Perspective published in *Advances in Nutrition* shows how beverages can be incorporated in the 2015 Healthy U.S.-Style Eating Pattern at the 2,000-calorie level.³

Food group	Amount in the 2000-kcal level pattern	1 cup-eq or 1 oz-eq of food	1 cup-eq or 1 oz-eq of beverage
Vegetables			
Dark green	1.5 cup-eq/wk	1 cup raw or cooked vegetables,	1 cup 100% vegetable juice,
Red & orange	5.5 cup-eq/wk	2 cups green leafy salad greens,	e.g., tomato, carrot
Legumes	1.5 cup-eq/wk	0.5 cup dried vegetables	
Starchy	5.5 cup-eq/wk		
Other	4.5 cup-eq/wk		
Fruits	2.5 cup-eq/d	1 cup fresh fruits, 0.5 cup dried fruits	1 cup 100% fruit juice, e.g., orange, grapefruit
Grains	6 oz-eq/d		
Whole grains	≥3 oz-eq/d	1 oz dry pasta or rice, 1 medium slice bread, 0.5 cup cooked rice, pasta, or cereal, 1 oz ready-to-eat cereal	NA
Refined grains	≤3 oz-eq/d		
Dairy	3 cup-eq/d	1 cup yogurt, 1.5 oz natural cheese, e.g., cheddar, 1 oz processed cheese	1 cup milk or fortified soy milk
Protein foods	5.5 oz-eq/d		
Seafood	8 oz-eq/wk	1 oz seafood	
Meat, poultry, eggs	26 oz-eq/wk	1 oz lean meat or poultry, 1 egg	NA
Nuts, seeds, soy food products	5 oz-eq/wk	0.25 cup cooked beans or tofu, 1 tbsp peanut butter, 0.25 cup nuts or seeds	
Oils	27 g/d		NA
Limits on calories for other uses (%kcal)	<270 kcal/d (<14%)		

¹ 1 cup-eq = 237 mL; 1 oz-eq = 30 g; 1 tbsp = 14.8 mL, eq, equivalent; NA, not applicable.

Expanded beverage guidance would also more accurately reflect current consumer eating and drinking behaviors, potentially leading to DGAC and DGA recommendations that have greater resonance with the public. Today, Americans are consuming an increasingly diverse array of beverages to meet health and wellness needs, as well as personal preferences. Estimates based on Coca-Cola’s analysis of Nielsen historical data show the number of distinct stock-keeping units (SKUs) for non-alcoholic ready-to-drink beverages sold in the U.S. increased from roughly 19,000 in 2001 to more than 35,000 in 2019 – an increase of nearly 85%. As a result, consumers are now purchasing new beverages like kombuchas, enhanced waters, ready-to-drink coffees and smoothies at growing rates. In 2017, U.S. retail sales of cold brew coffee grew 137%, while sales of lactose-free milk increased by 14%. In 2018, plant-based beverages grew by 6%^{4,5} and sparkling water sales grew 22% between 2017 and 2018.⁶

We understand that 2020 DGAC findings concerning specific beverages and nutrients/food components found in beverages are governed by the research questions presented to the Committee. If the 2020 DGAC is unable to address beverages more broadly, Coca-Cola requests that the Committee includes recommendations for future beverage-related research/research questions in its technical report.

II. Coca-Cola’s Approach to Developing Beverage Guidance

Much like the DGAC’s approach, our view of effective guidance categorizes different types of beverages according to their contributions to, and role in, the diet. We recognize that the DGAC will comprehensively review the scientific literature and may develop different recommendations; however, we hope the completeness of these comments will inform the DGAC’s approach to developing

recommendations. We also hope these comments will be useful to the U.S. Department of Agriculture (USDA) and U.S. Department of Health and Human Services (HHS) as they develop the 2020-2025 DGA and supporting communications and education materials.

In developing the beverage guidance beginning on page 5 of this letter, Coca-Cola consulted key publications and data (each footnoted in this letter) including:

- Authoritative positions around types and amounts of beverages;
- Systematic reviews, meta-analyses, and global food-based dietary guidelines;
- Nutrition gaps and excesses; and
- Existing public health recommendations.

Additionally, Coca-Cola considered *why* consumers drink beverages and *how* consumers should incorporate them in their daily diet to support health, wellness or lifestyle preferences. We propose that beverages can play four main roles in the diet:

1. Hydration: Water and other beverages are the primary way Americans quench thirst and achieve fluid needs. Beverages, including tap water, contribute 80% of fluid needs.⁷
2. Nutrition and Health: Provided they meet certain criteria, beverages can help consumers meet nutrition and health goals by contributing to food group, nutrient and phytonutrient intakes, as well as by providing healthful alternatives to sugar-sweetened beverages.
 - a. The 2015-2020 DGA state that saturated fat should be limited to less than 10% of calories, added sugar to less than 10% calories and sodium to less than 2,300 mg per day.²
 - b. In order to best translate these daily limits to an appropriate beverage-specific limit, Coca-Cola recommends that beverages qualifying for the “Nutrition and Health” category must contain no more than 10-15% Daily Value (%DV) per serving for added sugar, saturated fat and sodium.² Consumers use % DV on the Nutrition Facts label to understand how a certain food or beverage fits within a daily diet.
3. Enjoyment: Americans have long enjoyed drinking beverages for refreshment. Beverages in this category should be consumed within recommended discretionary calorie limits.
4. Performance: For specific sub-populations, including individuals who engage in prolonged vigorous physical activity (athletes, people with physically demanding work, members of the military, etc.) or those sweating for extended hours due to warm temperatures, certain beverages can be used to support physical performance.^{8,9,10}

By creating a framework that includes guidance for all types of beverages, the DGA can help drive Americans towards healthier versions of drinks they are typically consuming. Recommending limited consumption or small shifts towards healthier beverages is more effective than simply discouraging the consumption of entire beverage categories.¹¹ This approach also incentivizes food and beverage manufacturers to continue to innovate and reformulate towards healthier options to meet consumer needs.

The summary chart below describes these four roles in more detail, along with the types of beverages that support each role.

Description of Beverage Roles in the Diet

Role	Hydration	Nutrition and Health	Enjoyment	Performance
Recommendation	While all beverages may contribute to daily fluid needs, <u>unsweetened water, including flavored and carbonated, should be the most frequently consumed beverage.</u>	Beverages in this category can be consumed to help meet nutrition and health goals. For beverages to contribute to nutrition and health, they <u>should contain no more than 10-15% DV for added sugar, saturated fat and sodium.</u> ²	Beverages in this category should be <u>consumed within recommended discretionary calorie limits.</u>	<u>Under specific circumstances,</u> beverages in this category can be <u>consumed to support physical performance.</u> Otherwise, these beverages should only be consumed within recommended discretionary calorie limits, for enjoyment.
Relevant beverages	All beverages can contribute to daily fluid needs. However, some beverages' primary function is supporting hydration, such as: <ul style="list-style-type: none"> • Water, including still, carbonated and flavored 	Beverages in this category contain no more than 10-15% DV for added sugar, saturated fat and sodium and may include: ² <ul style="list-style-type: none"> • Low- and non-fat milk • Plant-based beverages • 100% fruit or vegetable juice and 100% juice diluted with water (no added sugar) • Coffee and tea <p>While research is limited, this category may also include but is not limited to:</p> <ul style="list-style-type: none"> • Meal-replacement drinks • Fermented dairy products (e.g., kefir) • Probiotic drinks (e.g., kombucha) • Smoothies containing one or more recommended food groups 	Beverages in this category either: <ul style="list-style-type: none"> • Do not contribute to food group, nutrient and/or positive food components; or • Contribute to food group, nutrient and/or positive food component intakes, but contain more than 10-15% DV for added sugar, saturated fat or sodium <p>Examples of beverages in this category include but are not limited to:</p> <ul style="list-style-type: none"> • Sugar-sweetened beverages • Beverages sweetened with no- and low-calorie sweeteners to help reduce sugar-sweetened beverages/added sugar intake • Sugar-sweetened coffees and teas • Higher saturated fat milk/dairy drinks • Alcoholic beverages also fall into this category; however, they are outside the scope of this guidance 	Beverages in this category include but are not limited to: <ul style="list-style-type: none"> • Sports drinks • Recovery drinks • Other drinks specifically formulated for physical activity

III. Detailed Beverage Guidance

For each beverage role and category, Coca-Cola proposes DGAC/DGA language and key considerations/rationale that informed the proposed language. We also offer remarks on the DGAC’s proposed beverage categories and definitions.

Hydration		While all beverages may contribute to daily fluid needs, unsweetened water, including flavored and carbonated, should be the most frequently consumed beverage.	
Water	Definition Remarks	Proposed DGAC/DGA Language	
	<ul style="list-style-type: none"> Recommend the Beverages and Added Sugar (BAS) Subcommittee adopt DAFPM definition for water 	<ul style="list-style-type: none"> Water should be the primary beverage choice² Water is not recommended for infants 0-6 months old¹² Water consumption is particularly important for older adults as they are at higher risk of dehydration⁷ 	
<p>Considerations:</p> <ul style="list-style-type: none"> Unsweetened carbonated and flavored water offer an additional appealing, calorie-free alternative to still water while providing the same hydrating effect.^{2,13} Guidance from the Robert Wood Johnson Foundation recommends water – including carbonated water – for its numerous health benefits, such as hydration, obesity prevention and cavity reduction.¹⁴ The latest National Academies of Sciences, Engineering and Medicine report on fluid recommendations was published in 2004. Due to limited research, there is not scientific consensus on the amount of water individuals should consume. Existing recommendations are highly variable and range considerably on a daily basis and by age and sex. The 2020 DGAC may find it valuable to recommend this as a future research direction.⁷ 			

Nutrition and Health		Beverages in this category can be consumed to help meet nutrition and health goals. For beverages to contribute to nutrition and health, they should contain no more than 10-15% DV for added sugar, saturated fat and sodium.	
Milk	Definition Remarks	Proposed DGAC/DGA Language	
	<ul style="list-style-type: none"> Recommend BAS adopt DAFPM definition for milk 	<ul style="list-style-type: none"> Milk plays an important role in development and health, and contributes essential nutrients to healthy eating patterns, including protein, calcium, vitamin D and potassium² Consume to meet dairy recommendation (3 cups/day)² Less than 1 year: Cow’s milk is not advised¹² Ages 1-2: Whole milk is recommended¹⁴ Ages 2 and older: Skim or low-fat milk is recommended¹⁴ Milk choices that contribute to nutrition and health contain no more than 10-15% DV for added sugar and saturated fat (i.e., low- and non-fat milk) 	
<p>Considerations:</p> <ul style="list-style-type: none"> Authoritative guidance recommends milk consumption due to its nutrient density – each serving delivers nine essential nutrients.² In its review of the scientific literature, the 2015 DGAC found healthy dietary patterns that include milk are associated with decreased risk of certain chronic diseases.¹³ According to the 2015-2020 DGA, soy beverages that are fortified with calcium, vitamin A and vitamin D are included as part of the dairy group because they are nutritionally similar to cow’s milk.² 			

Plant-based Beverages	Definition Remarks	Proposed DGAC/DGA Language
	<ul style="list-style-type: none"> Recommend adding separate “plant-based beverages” category Proposed definition: Fortified soy milk, plant-based beverages (e.g., almond, oat, rice) 	<ul style="list-style-type: none"> When fortified, plant-based beverages may provide nutrients and support consumer choice, but generally should not be considered a replacement for dairy <ul style="list-style-type: none"> Fortified soy milk can be an appropriate substitute for dairy² Soy milk should only be used as a milk replacement in children when necessary¹² Other plant-based milk substitutes are not recommended as a replacement for milk in children¹² Plant-based beverage choices that contribute to nutrition and health contain no more than 10-15% DV for added sugar, saturated fat and sodium
Considerations:		
<ul style="list-style-type: none"> According to the 2015-2020 DGA, soy beverages that are fortified with calcium, vitamin A and vitamin D are included as part of the dairy group because they are nutritionally similar to cow’s milk.² Other plant-based beverages that are not nutritionally similar are inappropriate for inclusion in the “dairy” category. 		
100% Juice and Diluted 100% Juice	Definition Remarks	Proposed DGAC/DGA Language
	<ul style="list-style-type: none"> Recommend BAS and DAFPM include “diluted 100% juice” in “100% juice” category Recognize “diluted 100% juice” as separate from “diet beverage” and “fruit drink” 	<ul style="list-style-type: none"> Juice contributes to the public’s consumption of essential nutrients, phytonutrient and fruit/vegetable intake^{15,16} Ages 1-3: Up to 4 oz per day^{12,17} Ages 4-6: Up to 4-6 oz per day^{12,17} Ages 7 and older: Up to 8 oz per day^{12,17} 100% juice that has been diluted with water, whether diluted at home or ready-to-drink, is an option for sugar and calorie reduction in adults and children¹⁸ Juice choices that contribute to nutrition and health contain 0 grams of added sugar and no more than 10-15% DV for sodium
Considerations:		
<ul style="list-style-type: none"> The 2015-2020 DGA recognize that diluted juice provides essential nutrients and contributes to fruit and vegetable food group recommended intakes.² <ul style="list-style-type: none"> For example, an 8-oz portion of fruit juice that is diluted with water to contain 50% juice can contribute ½ cup serving of fruit or vegetables.¹³ A consensus statement from leading national health and nutrition organizations permits consumption of 100% fruit and vegetable juice or fruit juice combined with water in children and adults, explaining that fruit juice consumption supports fruit intake recommendations.¹² A policy statement from the American Academy of Pediatrics recognizes the role of 100% or diluted fruit juice in a well-balanced diet.¹⁷ Recent research indicates 100% fruit and vegetable juice is a key source of phytonutrients, which are associated with health benefits.^{15,16} 		

Coffee & Tea	Definition Remarks	Proposed DGAC/DGA Language
	<ul style="list-style-type: none"> Recommend BAS adopt DAFPM definition 	<ul style="list-style-type: none"> Coffee and tea are sources of health-promoting phytonutrients and are associated with reduced risk of certain non-communicable diseases (NCDs)^{19,20,21,22,23} Limit consumption of caffeinated coffee/tea to caffeine limits (400 mg caffeine/day in adults) and/or choose decaffeinated versions² <ul style="list-style-type: none"> Caffeinated beverages are not recommended under 5 years old; otherwise, caffeine should be limited to <2.5 mg/kg body weight in children less than 19 years old¹³ Pregnant women should limit caffeine intake¹³ Coffee and tea choices that contribute to nutrition and health contain no more than 10-15% DV for added sugar and saturated fat
<p>Considerations:</p> <ul style="list-style-type: none"> Current DGA recommendations include coffee and tea as examples of beverages that contain caffeine but do not recognize the important role coffee and tea can play in promoting health.² Numerous scientific studies, including randomized clinical trials, epidemiological studies and meta-analyses, suggest that tea and its bioactive polyphenolic components have beneficial effects on health, such as the prevention of multiple diseases including cancer, diabetes, CVD and obesity.^{19, 20,21,22,23} Evidence demonstrates coffee and tea contain several different phytonutrients, including phenolic compounds and flavanols, which may offer health benefits like antioxidant activities, increased insulin activity, enhanced fatty acid oxidation and improved modulation of glucose metabolism.³ Decaffeinated versions of tea and coffee are widely available and can be useful for providing the benefits of coffee and tea without the caffeine content. Consumers can replace sugar-sweetened beverages with unsweetened coffee and tea to reduce added sugar intake.^{24,25,26} 		

Enjoyment		
Beverages in this category should be consumed within recommended discretionary calorie limits.		
Beverages with higher amounts of added sugar, saturated fat or sodium	Definition Remarks	Proposed DGAC/DGA Language
	<ul style="list-style-type: none"> Recommend DAFPM clarify that “diluted juice” is distinct from the “fruit drink” sub-category under “sugar-sweetened beverages” Includes any beverage exceeding 10-15% DV for sodium, added sugar and saturated fat 	<ul style="list-style-type: none"> Only consume within remaining discretionary calories Sports drinks should be consumed within remaining discretionary calories unless they are consumed during prolonged vigorous physical activity or sweating^{2,8,9,10}
<p>Considerations:</p> <ul style="list-style-type: none"> Past DGA have identified an amount of discretionary calories from added sugar and saturated fat that allow foods and beverages primarily for enjoyment to be incorporated in a healthy eating pattern.² 		

Beverages sweetened with no- and low-calorie sweeteners to help reduce sugar-sweetened beverage/added sugar intake	Definition Remarks	Proposed DGAC/DGA Language
	<ul style="list-style-type: none"> Recommend referring to “diet beverages” as “low- and no-calorie beverages” Recommend BAS remove “diluted juice” from “diet beverage” category Recommend DAFPM clarify that “diet beverages” or “low- and no-calorie beverages” can be lightly sweetened with sugar and/or sweeteners, and still contain “40 kcal or less per serving size” Includes any low- or zero-sugar, sweetened beverages that do not contribute food group, nutrient or phytonutrient intakes 	<ul style="list-style-type: none"> Replace sugar-sweetened beverages >40 kcal that do not contribute significantly to nutrition needs²⁷ with these beverages to reduce calorie and sugar consumption^{13,14}
Considerations:		
<ul style="list-style-type: none"> While most low-or-zero-sugar beverages do not contribute positive nutrients or food groups to the diet, they can play an important role in helping individuals reduce calories and added sugar and replace sugar-sweetened beverages.^{13,14} While “diet” is commonly used in the marketplace to signify a lower-calorie version of a known higher-sugar/caloric food or beverage, its use is not cross-cutting. To ensure consumers do not only consider beverages with “diet” on their label as part of this category, we suggest the adoption of the “low- and no-calorie beverages” terminology rather than “diet beverages,” as is currently used in the BAS and DAFPM protocols. 		

Performance	Under specific circumstances, beverages in this category can be consumed to support physical performance. Otherwise, these beverages should only be consumed within recommended discretionary calorie limits, for enjoyment.	
Sports Drinks	Definition Remarks	Proposed DGAC/DGA Language
	<ul style="list-style-type: none"> Sports drinks should continue to be included in the definition of “sugar-sweetened beverages,” but their role in supporting performance should be noted separately 	<ul style="list-style-type: none"> Sports drinks can be beneficial for individuals who engage in prolonged vigorous physical activity, or those sweating for prolonged hours due to warm to hot temperatures^{8,9,28} In all other scenarios, sports drinks should be consumed only for enjoyment within discretionary limits
Considerations:		
<ul style="list-style-type: none"> Research shows sports drinks benefit individuals who engage in prolonged vigorous physical activity (athletes, people with physically demanding work, members of the military, etc.) or those sweating for extended hours due to warm temperatures, by supporting performance, recovery and health – including prevention of heat-related illness.^{8,9,28} Unless consumed for these very specific purposes, sports drinks are considered sugar-sweetened beverages that should be consumed within discretionary calorie limits. 		

In addition to considering this beverage guidance as a framework for integrating findings across subcommittees, we encourage the 2020 DGAC to take the following actions:

1. Harmonize beverage definitions, categories and terminology across the DAFPM Cross-Cutting Working Group, BAS Subcommittee and DP Subcommittee. Consistency among these groups will facilitate clear translation of the DGAC report to the DGA policy document and will be most useful to health professionals and consumers who use DGA guidance.
2. Beverages (namely coffee, tea and 100% juice), are top sources of phytonutrients. We ask that in the review of the evidence for the research question, “what is the relationship between beverage consumption and meeting nutrient and food group recommendations,” the subcommittee consider how beverages contribute to phytonutrient intake in addition to vitamins, minerals and food groups.

The Coca-Cola Company appreciates the opportunity to comment and support the work of the 2020 DGAC as we strive to provide our consumers with the information and guidance they need to drink beverages healthfully. We are happy to provide the DGAC, USDA and HHS with any additional information that may be valuable.

Respectfully submitted,



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¹ WHO. Guideline: Sugars intake for adults and children. Geneva: World Health Organization. 2015. Available at: https://www.who.int/nutrition/publications/guidelines/sugars_intake/en/.

² U.S. Department of Health and Human Services, U.S. Department of Agriculture. 2015–2020 Dietary Guidelines for Americans. 8th Edition. 2015. Available at <http://health.gov/dietaryguidelines/2015/guidelines/>.

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