

Weekly Market Bulletin

State of New Hampshire
Chris Sununu
Governor

Department of Agriculture, Markets & Food
Shawn N. Jasper
Commissioner

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From Your Commissioner

Sugar Added Label

If you are a maple syrup or honey producer in this state, you are aware of the proposal by the Food and Drug Administration (FDA). The proposal requires that the natural sugars of those and other products be listed on labels as “added sugar”. While there would be a symbol on that line directing consumers to an explanation, the State of New Hampshire believes that this requirement would be misleading, at best, and potentially economically damaging at its worst. Accordingly this department, working with the Governor’s Office, and in consultation with the Department of Business and Economic Affairs, submitted the following response to the proposal. While it is a bit snarky, we find the proposal to be so ill conceived as to warrant a response that clearly demonstrates our collective disdain for the idea.

The State of New Hampshire takes strong issue with the FDA’s absurd suggestion that our state’s maple and honey based products, which are the most incredibly delicious and sweet products available, must be required to be labeled as “sugar added.”

Sugar is scientifically proven to naturally exist within certain plant-based products. This includes such plant-based products as apples, oranges, cranberries, bananas, and pineapples. Science has also proven that maple products come from maple trees, which can be found growing in the ground in many places in New Hampshire. New Hampshire’s position is that by coming from a tree growing in the ground (soil), this inherently suggests a nature-based product. As a side note, in September and October, the leaves of these trees change color from green to a beautiful spectrum of oranges and reds. You can see many pictures of this process on the Internet or better yet, visit the Granite State and see for yourself. We can assure you that this is a naturally-occurring process (like the sugar in the trees) and that no state officials or residents of New Hampshire are responsible for artificially adding these colors. This also has been the subject of scientific research.

For generations, enterprising Granite Stater’s have operated sugar shacks, boiling natural sap, removing – not adding - the natural sediment known as sugar sand to arrive at the natural product known as “maple syrup.” Maple trees produce a sap that is a “natural sugar” and that by “boiling”

such sap it removes water and concentrates the sugar into the final product. In fact, the FDA is invited to send a team to New Hampshire next March to personally observe this ancient practice.

Honey is a by-product of bees pollinating flowering plants and trees. Honey starts as flower nectar collected by bees, which are then broken down into simple sugars stored inside the honeycomb. The design of the honeycomb and constant fanning of the bees' wings causes' evaporation, creating sweet liquid honey; a totally natural process.

Beekeeping is an important part of the agricultural ecosystem and we are seeing a substantial loss of bees each year (58% die-off in 2018). If not for beekeepers repopulating bee hives and moving them into orchards it is questionable as to whether the remaining population would be able to fulfil the pollination needs of the state. If this absurd labeling requirement goes into place and the economic viability of the beekeeping industry is harmed, the environmental consequences of that action would be the sole responsibility of the FDA.

The State of New Hampshire believes that it would be more effective to merely add an additional line reading; "Natural Sugar" to the label, than what is being proposed. Adding such a line would insure that no consumer would be confused by having a misleading line which provides false information and then having to explain why the information on the line is not actually accurate.

If the FDA is concerned about adding to the length of the label then we would suggest eliminating the current line reading; "Total Sugars" and replacing it with the line reading; "Natural Sugars". While that would not provide the total of the sugars on the label, we believe that it is far more likely that a consumer would add the two lines together than it is that they would see the symbol and read the notation. This would also make it clear, at a glance, which products have naturally occurring sugar and which have had sugar added.

With the above in mind, the State of New Hampshire respectfully requests that the FDA reconsider its bizarre notion that maple syrup and honey should be labeled as "sugar added."

Shawn N. Jasper – Commissioner