

Oatly Feedback on Definition of “Added Sugar” in Mercosur Regulation

Background

Mercosur has proposed a definition of “added sugar” that includes sugars formed through enzymatic processes in plant-based products. This is problematic for plant-based drinks (milk alternatives), such as oat drinks, where sugars are derived from starch during starch hydrolysis. There is no addition of sugar during hydrolysis. Enzymatic hydrolysis of starch uses amylases, the same kind of enzymes that are naturally present in our gastrointestinal tract and a similar process to how the human body converts starch to sugar during digestion. Including these sugars in the definition of “added sugars” would misrepresent unflavoured plant-based drinks. Oatly retain much of the goodness of wholegrain oats in its drinks. Fortified oat drinks typically provide essential vitamins, minerals, fiber, and healthy unsaturated fats - key components of a balanced diet, recognized by their inclusion in several authorities' dietary guidelines around the world¹.

Why This Matters

There is no addition of sugar during hydrolysis. The sugars are derived from starch and should not be classified as “added sugar.” Misclassification would be scientifically unjustified and could mislead consumers. Plant-based drinks typically contain similar amounts of total sugar compared to cow’s milk, which has approximately 4–5 grams per 100 milliliters. The amount of sugar in Oatly drinks is about a teaspoon (3.5 g) per 100 ml, which is similar to (actually a little less) to levels found in cow’s milk. The sugar you’ll find in our drinks is called maltose, the sugar found in cow’s milk is called lactose. Our unflavoured oat drinks contain no added sugar or artificial sweeteners.

Defining the sugars found in unflavoured plant-based drinks as “added sugar”, when there is no addition of sugar, could lead consumers to perceive plant-based drinks as less healthy than milk, despite their comparable sugar content. There is also a risk that consumers might mistakenly associate plant-based drinks with sugar-sweetened beverages, considering them significant sources of added sugar, which is incorrect. Plant-based drinks are not rich in sugars and do not contribute significantly to dietary sugar intake, unlike foods such as sugary cereals, biscuits, cakes, puddings, soft drinks, preserves, and confectionery.

Scientific Evidence

The European Food Safety Authority (EFSA) has analyzed the health effects of sugars and concluded that unflavoured plant-based drinks belong to the core food category and should not

¹ Klapp AL, Feil N, Risius A. (2022). A Global Analysis of National Dietary Guidelines on Plant-Based Diets and Substitutions for Animal-Based Foods. *Curr Dev Nutr.* Sep 20;6(11):nzac144. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9708321/> (Accessed Jan 2026).

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Australian Government. (2013). Australian Guide to Healthy Eating <https://www.eatforhealth.gov.au/guidelines/australian-guide-healthy-eating> (Accessed Jan 2026).

National Institute for Health & Welfare (THL). (2024). Finnish Sustainable Health From Food - National Nutrition Recommendations. <https://www.julkari.fi/items/9d790f35-8e24-4fe0-9d68-c90ad5bb4cec> (Accessed Jan 2026).

Norwegian Directorate for Health. (2024). Norwegian Dietary Advice and Nutrients. <https://www.helsenorge.no/en/kosthold-og-ernaring/dietary-guidelines/> (Accessed Jan 2026).

be included in food groups to restrict². Similarly, the World Health Organization's definition of sugar-sweetened beverages excludes unflavoured plant-based drinks, as they contain no sugars added during manufacture³. Most unflavoured plant-based drinks are free from added sugars, and only a minority add small amounts to match the sweetness of milk.

The Role of Starch Hydrolysis

Starch hydrolysis is fundamental for the functionality of cereal-based plant-based drinks. It ensures the right viscosity and flavor, making these products suitable alternatives to milk and facilitating the transition for consumers who choose plant-based options for medical, ethical, environmental, or other reasons. Plant-based foods play a critical role in addressing climate change and public health challenges, and nutrition labeling regulations should encourage the shift toward a sustainable food system rather than hinder it.

Our Proposal

The definition of "added sugar" should be limited to sugars intentionally added as separate ingredients during food preparation or formulation. Sugars formed through natural or incidental enzymatic reactions should be excluded. This approach aligns with scientific principles, supports accurate labeling, and promotes consumer trust while encouraging innovation in sustainable, plant-based products.

We hope our response is useful and contributes constructively to the further development of this initiative. We remain at your disposal for any additional information or clarification.

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ABOUT OATLY

Oatly is the original and leading oat drink company. Ever since the beginning, nutrition and health have been central to our mission. Rooted in science and innovation, we've spent over 30 years exploring the health benefits of oats and developing plant-based drinks that support human nutritional needs. Our mission is to help people eat better and live healthier lives—without recklessly taxing the planet's resources in the process. Headquartered in Malmö, Sweden, the Oatly brand is available in more than 30 countries globally.

² Turck, et al. Tolerable upper intake level for dietary sugars. EFSA Journal 2022;20(2):7074.

<https://efsa.onlinelibrary.wiley.com/doi/10.2903/j.efsa.2022.7074> (Accessed Jan 2026).

³ <https://iris.who.int/server/api/core/bitstreams/971f1b69-7eda-4329-a152-3e1d15b5c2c7/content>