



January 9, 2020

[Via email susan.Mayne@fda.hhs.gov & 1st Class Mail]

Dr. Susan T. Mayne
Director, Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Dr. Mayne:

The Center for Science in the Public Interest (CSPI) writes to urge the Food and Drug Administration (FDA) to take immediate enforcement action to prevent unauthorized implied “low sugar” and “reduced sugar” claims, such as “lightly sweetened” and “less sweet,” on beverage products that are high in sugar. These claims are in violation of the federal Food, Drug, and Cosmetic Act (FDCA), and mislead consumers by obscuring which choices of beverages best support a healthful diet.

CSPI is a non-profit consumer education and advocacy organization that has worked since 1971 to improve the public’s health through better nutrition and safer food. We do not accept government or corporate grants and are supported primarily by the more than half million subscribers to our Nutrition Action Healthletter. CSPI provides nutrition and food safety information directly to consumers, and has long advocated for legislation, regulation, and judicial rulings to ensure that food labels and advertising are clear and transparent, and that they convey useful and relevant public health information.

Below we discuss the importance of reducing sugar consumption, and the role labeling can play in either supporting or hindering sugar reduction efforts. We establish that “low sugar” claims are presently not authorized by FDA, and that “reduced sugar” claims must meet specific requirements. We present examples of 19 products from five different brands currently marketed with unauthorized implied “low sugar” or “reduced sugar” claims and describe how the labeling of these products is misleading. Finally, we call on FDA to take action against the manufacturers of these products and urge the agency to issue regulations authorizing “low added sugar” claims based on the Daily Value (DV) for added sugar. Such regulations would allow more healthful products to identify themselves, while precluding less healthy products from bearing misleading claims.

I. Reducing added sugar consumption is a public health priority, and misleading labeling inhibits progress on this priority

Data from the National Health and Nutrition Examination Survey (2015-2016) make clear that Americans are eating and drinking too much sugar. About 13 percent of calories consumed by

adults come from added sugars,¹ and such sugars make up an even higher percent of children’s calories (16 percent).² In contrast, the 2015-2020 Dietary Guidelines for Americans (DGA) recommend consuming less than 10 percent of one’s total daily calories from added sugars.³ Only 44% of adults and 33% of children are meeting this recommendation.⁴

The DGA guideline for added sugar intake forms the basis of the percentage DV for added sugars adopted by the FDA in its Final Rule on the Revision of the Nutrition Facts panel.⁵ The new added sugars line assists Americans in following advice that they should limit added sugars to no more than 50 grams daily for a 2,000 calorie per day diet.

This advice is based on ample scientific support for the benefits of a diet limited in added sugars. The DGA conclude that “strong evidence” shows that higher consumption of added sugars is associated with the risk for excess body weight and type 2 diabetes. They also concluded that “strong evidence” shows that eating patterns that include lower intake of added sugars are associated with reduced risk of cardiovascular disease in adults, and “moderate evidence” shows that such eating patterns are associated with reduced risk of obesity, type 2 diabetes, and some cancers.⁶ The FDA took note of these findings in its Final Rule on the Nutrition Facts panel, noting that the DGA “concluded that there is strong and consistent evidence that healthy dietary patterns characterized, in part, by lower intakes of sugar sweetened foods and beverages relative to less healthy patterns, are associated with a reduced risk of CVD.”⁷

Food labeling has the potential to amplify the DGA’s messages by providing consumers with clear, actionable information to help them make healthy choices and limit their sugar consumption. But too often, food labels bear claims that mislead consumers to select less healthy products that they believe to be healthy. Consumers seeking to adhere to the DGA guidance on added sugars may seek products labeled “reduced sugar” or products claiming to be low in total or added sugars. Unfortunately, some products presently on the market bear claims that could mislead consumers to select products they believe to be compatible with efforts to limit sugar intake, but which actually contain high amounts of sugar.

¹ U.S. Department of Agriculture Food Surveys Research Group. Added sugars in adults’ diet: what we eat in America, NHANES 2015-2016. *Dietary Data Brief No. 24*. (October 2019). https://www.ars.usda.gov/ARSUserFiles/80400530/pdf/DBrief/24_Sources_of_Added_Sugars_in_Adults'_Diet_2015-2016.pdf

² U.S. Health & Human Servs., U.S. Dept. of Agriculture, *Dietary Guidelines for Americans 2015-2020*, 8th Ed. (Dec. 2015). https://health.gov/dietaryguidelines/2015/resources/2015-2020_Dietary_Guidelines.pdf.

³ *Ibid.*

⁴ U.S. Department of Agriculture Food Surveys Research Group. Added sugars intake of Americans: what we eat in America, NHANES 2013-2014. *Dietary Data Brief No. 18*. (May 2017). https://www.ars.usda.gov/ARSUserFiles/80400530/pdf/DBrief/18_Added_Sugars_Intake_of_Americans_2013-2014.pdf

⁵ Food and Drug Administration. Food Labeling: Revision of the Nutrition and Supplemental Facts Labels. 81 Fed. Reg. 22742 (May 27, 2016).

⁶ *Ibid.*

⁷ Food Labeling: Revision of the Nutrition and Supplement Facts Labels, 81 Fed. Reg. 33,742, 33,779 (finalized May 27, 2016) (codified at 21 C.F.R. Part 1) [hereinafter 81 Fed. Reg. 33,742].

II. Unauthorized low sugar and reduced sugar claims are prohibited under the Federal Food, Drug, and Cosmetic Act

A nutrient content claim, the category of claim to which these “low sugar” and “reduced sugar” claims belong, is defined as “[a] claim that expressly or implicitly characterizes the level of a nutrient of the type required to be in nutrition labeling.”⁸ Nutrient content claims can either be express (*e.g.*, “low sodium”) or implied. An implied nutrient content claim includes any claim that “[d]escribes the food or an ingredient therein in a manner that suggests that a nutrient is absent or present in a certain amount (*e.g.*, “high in oat bran”).”⁹ Nutrient content claims can also be either absolute (*e.g.*, “low fat”) or relative (*e.g.*, “reduced fat”). Separate regulations cover the use of absolute, versus relative, claims.¹⁰

Under the federal Food, Drug, and Cosmetic Act (FDCA) section 403(r)(2)(A)(i), a nutrient content claim must be made in accordance with specific regulations authorizing the use of that type of claim.¹¹ In 1993, FDA issued rules authorizing nutrient content claims for total fat, saturated fat, cholesterol, sodium, and (total) sugars.¹² The rule authorized “low xxx” claims for fat, saturated fat, cholesterol, sodium, and calories,¹³ and set upper thresholds for the amount of the relevant nutrient permitted per serving on foods that make such claims. However, FDA chose not to define absolute “low sugar” claims in its 1993 rule because it found that “the available consensus documents do not provide quantitative recommendations for daily intake of sugars.”¹⁴ Since then, the body of evidence on harms of excessive intake of added sugars has mounted sufficiently that recommendations to limit added sugars are included in the DGA. However, FDA has not yet amended its regulations to define either “low sugar” or “low added sugar” claims. Since there are no regulations authorizing the use of express or implied “low sugar” claims, FDA has stated that no such claims may be used.¹⁵

The 1993 rule did, however, authorize the use of relative “reduced sugar” claims, such as “less sugar” and “lower in sugar,” under certain conditions. “Reduced sugar” claims are authorized on foods that contain at least 25 percent less sugar per Reference Amount Customarily Consumed (RACC) compared with an appropriate reference food.¹⁶ To comply with the regulations, a food bearing a “reduced sugar” claim must disclose on its label the identity of the reference food and the percent that the amount of sugar differs between the two foods (*e.g.*, “50 percent less sugar than [reference food]”), in a statement immediately adjacent to the claim.¹⁷

⁸ 21 C.F.R. § 101.13(b).

⁹ 21 C.F.R. § 101.13(b)(2).

¹⁰ See, *e.g.*, 21 C.F.R. § 101.62(b)(2) and 21 C.F.R. § 101.62(b)(4).

¹¹ 21 U.S.C. § 343(r)(2)(A)(i).

¹² Food Labeling: Nutrient Content Claims, General Principles, Petitions, Definition of Terms; Definitions of Nutrient Content Claims for the Fat, Fatty Acid, and Cholesterol Content of Food, 58 Fed. Reg. 2302, 2305 (Jan. 6, 1993) (to be codified at 21 C.F.R. pts. 5 & 101) [hereinafter 58 Fed. Reg. 2302].

¹³ See 21 C.F.R. § 101.62; 21 C.F.R. § 101.61; 9 C.F.R. § 381.460.

¹⁴ 58 Fed. Reg. at 2335.

¹⁵ U.S. Food and Drug Administration. Food Labeling Guide. (January 2013).

<https://www.fda.gov/media/81606/download>.

¹⁶ 21 C.F.R. § 101.60(c)(5).

¹⁷ 21 C.F.R. § 101.13(j).

Thus, any food bearing a “low sugar” claim, and any food bearing a “reduced sugar” claim but failing to name a reference food, is misbranded under FDCA.

III. Manufacturers are making unauthorized low sugar and reduced sugar claims

CSPI identified 19 products from five different brands that make either unauthorized implied “low sugar” claims, or “reduced sugar” claims without naming a reference product, using the terms “sweet” and “sweetened” (Table 1).

Sweetness is typically derived from sugars (including dextrose, glucose, sucrose, and other sugars), which may be present in a variety of ingredients added to food, such as corn syrup, refined cane sugar, and concentrated fruit juices. The terms “sweet” and “sweetened,” when used without additional qualification, are generally understood to refer to sugar. This connotation is so strong that federal regulations sometimes require the disclosure “Sweetened with nonnutritive sweetener(s)” when sweetness is derived from an ingredient that does not contain sugar.¹⁸ Especially since none of the products in Table 1 contain nonnutritive sweeteners, the claims “lightly sweetened,” “sorta sweet,” “slightly sweet,” “just a tad sweet,” and “less sweet,” implicitly characterize levels of sugars.

The terms “lightly” (9 products), “sorta” (1 product), “slightly” (3 products), and “just a tad” (3 products) each imply that a low (*i.e.*, small) amount of sugars are present. The Merriam-Webster Dictionary defines the word “slight” to mean “small ... in amount.”¹⁹ A “tad” means “a small or insignificant amount or degree.”²⁰ These words are all synonymous with the word “low,” which is defined as “small in number or amount.”²¹ Therefore, the products bearing claims of “lightly sweetened,” “sorta sweet,” “slightly sweet,” and “just a tad sweet” all bear unauthorized implied “low sugar” claims and are misbranded under FDCA.

The term “less” (3 products) implies that a lower amount of sugars is present compared to some reference product. Because the Q Drinks products we identify in Table 1 are labeled “less sweet” and yet do not identify any reference product, they are also misbranded under FDCA.

Terms similar or identical to these unauthorized sugar claims are used elsewhere in the FDA’s food labeling regulations to indicate low or reduced amounts of sugars. For example, in the regulations defining the standards of identity for specific canned fruits, the phrases “slightly sweetened” and “lightly sweetened” are defined in contrast with “heavily sweetened” to characterize canned fruits with lower density of added “nutritive carbohydrate sweeteners” (*i.e.*, sugars).²² This provides further evidence that FDA regulations define terms like “slightly sweet” and “lightly sweetened” as implying low or reduced levels of sugars.

¹⁸ 21 C.F.R. § 105.66(b)(2).

¹⁹ Merriam-Webster Dictionary. <https://www.merriam-webster.com/dictionary/slight>. Accessed July 26, 2019.

²⁰ Merriam-Webster Dictionary. <https://www.merriam-webster.com/dictionary/tad>. Accessed July 26, 2019.

²¹ Merriam-Webster Dictionary. <https://www.merriam-webster.com/dictionary/low>. Accessed July 26, 2019.

²² *See* 21 C.F.R. 145.130(c)(2)(i).

Table 1: Products with High Levels of Sugars Making Implied Low Sugar Claims

Brand	Product	Implied Sugar Claim	Type of Claim	Serving Size	Sugars/ Serving*	RACC	Sugars/ RACC	%DV/ RACC
Honest Tea	Organic Peach Tea	“Just a Tad Sweet”	Low	16.9 fl. oz.	25 g	360 mL	18 g	36%
	Organic Half Tea & Half Lemonade			16.9 fl. oz.	25 g	360 mL	18 g	36%
	Organic Peach Oo-La-Long Tea			16 fl. oz.	15 g	360 mL	11 g	22%
Q Drinks Carbonated Mixer**	Q Spectacular Ginger Beer	“Less Sweet”	Reduced	7.5 fl. oz.	20 g	196 mL	18 g**	36%
	Q Spectacular Ginger Ale			7.5 fl. oz.	14 g	196 mL	12 g**	24%
	Indian Tonic Water			7.5 fl. oz.	16 g	196 mL	16 g**	32%
Snapple	Sorta Sweet Straight Up Tea	“Sorta Sweet”	Low	18.5 fl. oz.	21 g	360 mL	14 g	28%
Steaz Organic	Iced Green Tea, Blueberry Pomegranate	“Lightly Sweetened”	Low	16 fl. oz.	20 g	360 mL	15 g	30%
	Iced Green Tea, Super Fruit			16 fl. oz.	20 g	360 mL	15 g	30%
	Iced Green Tea, Lime Pomegranate			16 fl. oz.	20 g	360 mL	15 g	30%
	Iced Green Tea, Half & Half			16 fl. oz.	20 g	360 mL	15 g	30%
	Iced Green Tea with Coconut Water			16 fl. oz.	20 g	360 mL	15 g	30%
	Iced Green Tea, Grapefruit Honey			16 fl. oz.	20 g	360 mL	15 g	30%
	Iced Green Tea, Lemon Ginger			16 fl. oz.	20 g	360 mL	15 g	30%
	Iced Green Tea, Mint			16 fl. oz.	20 g	360 mL	15 g	30%
Iced Green Tea, Peach	16 fl. oz.	20 g	360 mL	15 g	30%			
Teas’ Tea	Peach Ginger Black Tea	“Slightly Sweet”	Low	16.9 fl. oz.	20 g	360 mL	14 g	28%
	Pomegranate Blueberry Green Tea			16.9 fl. oz.	20 g	360 mL	14 g	28%
	Mango Yuzu Green Tea			16.9 fl. oz.	20 g	360 mL	14 g	28%

DV = Daily Value for added sugars (50 g)

RACC = Reference Amount Customarily Consumed

*Total sugars and added sugars are equal for all products in this table; table uses DV for added sugars, as no DV has been established for total sugars

** Q Drinks are marketed as drink mixers. Because the RACC for mixers is the amount required to make a 240 mL drink (without ice), we assumed that is equivalent to the volume that remains after accounting for a standard 1.5 fl. oz. (44 mL) shot of liquor (e.g., a mixers RACC of 196 mL).

Finally, in the context of nutrient content claims, the terms “lightly,” “sorta,” “slightly,” and “just a tad” are undefined and constitute unauthorized synonyms for “low.” FDA has previously issued enforcement letters for unauthorized uses of synonyms for modifying terms used in nutrient content claims, such as a letter to Dr. Pepper Snapple Group in 2010 which stated, with respect to the claim “ENHANCED WITH 200 mg OF ANTIOXIDANTS FROM GREEN TEA & VITAMIN C”: “In the context of this label the term ‘enhanced’ is an unauthorized synonym for a ‘more’ nutrient content claim.”²³ Even if specific “low sugar” claims were authorized by FDA, the use of unauthorized synonyms would render the claims in violation of FDCA.

IV. “Low sugar” and “reduced sugar” claims on products that are not actually low in sugars are misleading

While the unauthorized claims in Table 1 would be in violation of FDCA on any products, we bring these particular products to the attention of FDA because they contain between 22 percent and 36 percent of the DV for added sugars per Reference Amount Customarily Consumed (RACC). Such claims are not only violative, but also particularly misleading, and pose a specific risk of harm to consumers seeking to lower their sugar consumption, including those with diet-related diseases, such as Type 2 diabetes.

FDA has not issued regulations defining “low sugar” or “low added sugar,” but the upper thresholds for “low xxx” claims characterizing levels of fat, saturated fat, cholesterol, and sodium range from 5 to 7 percent of the DV for the relevant nutrient, per RACC.²⁴ While there is no DV for total sugars, at 22 to 36 percent of the DV for added sugars, each of these products would far exceed a comparable threshold if a standard were set based on this DV.

Moreover, regulations allow “high” claims—nutrient content claims characterizing high levels of a nutrient—to be used, provided that the food contains at least 20 percent of the DV per RACC.²⁵ The products in Table 1 all exceed 20 percent of the DV for added sugars per RACC, meaning each of these products is not only not “low” in added sugars, but is actually “high” in added sugars according to FDA’s standard definition for “high in” claims.

In bearing implied “low sugar” or “reduced sugar” claims, these products’ labeling falsely implies that they are low in sugars, including added sugars. Consumers relying on these statements are misled to believe they are following the DGA’s advice and “selecting beverages low in added sugars,” even as they consume beverages that are actually high in added sugars.²⁶ This violates both FDA’s regulation of nutrient content claims, and the agency’s general prohibition against labeling that is false or misleading.

²³ U.S. Food and Drug Administration. Warning letter to Dr. Pepper Snapple Group. August 30, 2010. <https://www.fdalabelcompliance.com/letters/ucm224571>

²⁴ U.S. Food and Drug Administration. Food Labeling Guide. (January 2013).

²⁵ 21 C.F.R. § 101.54(b).

²⁶ U.S. Health & Human Servs., U.S. Dept. of Agriculture, *Dietary Guidelines for Americans 2015-2020*, 8th Ed. (Dec. 2015). https://health.gov/dietaryguidelines/2015/resources/2015-2020_Dietary_Guidelines.pdf.

V. FDA’s authority to regulate implied “low sugar” claims has not been affected by recent court decisions

The FDA’s authority to regulate implied “low sugar” claims is not affected by recent court decisions in private litigation addressing health and nutrient content claims on products high in added sugar, because they consider the claims in the context of a “healthy” claim. Several courts recently considered the claims “just a tad sweet” and “lightly sweetened.” In these decisions, the courts considered only the question of whether nutrient content claims implying that products are “healthy” are misleading when they are made on products high in added sugar.²⁷ Outside of a connection to “healthy” claims, the courts have *not* addressed whether implied “low sugar” nutrient content claims are specifically prohibited by federal regulations.²⁸

VI. Enforcement action is needed on “low sugar” claims

Based on the above, CSPI respectfully urges the FDA to take enforcement action against the manufacturers identified in this letter for making implied “low sugar” or “reduced sugar” claims unauthorized by current regulation, as well as any other manufacturers making similar claims that the agency may identify. Such claims are prohibited under federal law and are misleading. Moreover, these particular products should be an enforcement priority for the agency because they harm public health by applying such claims to products high in added sugars, making it harder for consumers to follow the DGA advice to limit calories from added sugars and to select beverages that are indeed low in added sugars.²⁹

In addition, we encourage the agency to move expeditiously to issue regulations authorizing “low added sugar” claims to be made on products that are truly low in added sugars. In authorizing such claims, we encourage the agency to develop a per-RACC threshold similar to that which is used for other “low” nutrient content claims, and to consider setting it no higher than 5 percent of the DV, or 3 grams,³⁰ per serving.

²⁷ See, e.g. *Salazar v. Honest Tea Inc*, 74 F. Supp. 3d 1304, 1316 (E.D. Cal. 2014); *Hadley v. Kellogg Sales Company*, 273 F.Supp.3d 1052 (N.D. Cal. 2017); *Krommenhock v. Post Foods*, 255 F.Supp.3rd 938 (N.D. Cal. 2017).

²⁸ The courts have been divided in their assessment of these claims. One California District Court opined that the implied low sugar claim “just a tad sweet” met the judicial standard for “puffery,” because it was vague and non-specific. *Salazar v. Honest Tea Inc*, 74 F. Supp. 3d 1304, 1316 (E.D. Cal. 2014) (A “tad” and a “kiss” are vague and non-specific terms that lack any clear, objective indication of their levels”). By contrast, at least one other district court considering this issue has correctly recognized that “lightly sweetened” is not “mere puffery,” but instead are “actionable,” because it can lead a reasonable consumer to draw conclusions about the level of sugar in the product. *Hadley v. Kellogg Sales Company*, 273 F.Supp.3d 1052, 1086 (N.D. Cal. 2017) (“[T]he Court cannot conclude that no reasonable consumer would rely on statements like “Lightly Sweetened” and “lightly frosted” and conclude that the amount of added sugar in the product is, at the very least, not so high that the product is unhealthy.”) Regardless, the court decisions applying the standard for puffery would not apply to FDA’s analysis of implied “low sugar” claims, because a claim that might be puffery in one context can be actionable when it has an objective meaning in another context, such as when the term is defined by regulation. For example, FDA regulations specify that claims indicating that a food is “a good source” of a particular nutrient are nutrient content claims characterizing the level of that ingredient, even though “a good source” (and other authorized, synonymous terms, such as “contains” and “provides”) does not specifically quantify the levels of the nutrient. See 21 C.F.R. § 101.54. Nutrient content claims for “good source,” “high,” “more,” and “high potency.”

²⁹ U.S Health & Human Servs., U.S. Dept. of Agriculture, *Dietary Guidelines for Americans 2015-2020*, 8th Ed. (Dec. 2015). https://health.gov/dietaryguidelines/2015/resources/2015-2020_Dietary_Guidelines.pdf.

³⁰ Five percent of the DV is equal to 2.5 grams, which has been rounded to 3 grams.

Sincerely,

Laura MacCleery
Policy Director
Center for Science in the Public Interest

Sarah Sorscher
Deputy Director of Regulatory Affairs
Center for Science in the Public Interest

Eva Greenthal
Policy Associate
Center for Science in the Public Interest

Appendix



Nutrition Facts	
1 Serving Per Container	
Serving Size	1 Bottle
Amount Per Serving	
Calories	100
	% Daily Value
Total Fat 0g	0%
Sodium 15mg	1%
Total Carbohydrate 25g	9%
Total Sugars 25g	
Includes 25g Added Sugars	49%
Cholesterol 0mg	0%
Protein 0g	
Vitamin D	0%
Calcium	0%
Iron	0%
Potassium	0%
Vitamin C	60%
Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron and potassium.	

INGREDIENTS

ORGANIC BREWED TEA (FILTERED WATER, FAIR TRADE CERTIFIED™ ORGANIC BLACK TEA LEAVES), FAIR TRADE CERTIFIED™ ORGANIC CANE SUGAR, ORGANIC PEACH PUREE, ORGANIC NATURAL FLAVORS, ASCORBIC ACID (TO PROTECT COLOR), CITRIC ACID.

<https://www.coca-colaproductfacts.com/en/products/honest-tea/peach-oo-la-long/16-oz/>

Accessed December 12, 2019



Nutrition Facts	
1 Serving Per Container	
Serving Size	1 Bottle
Amount Per Serving	
Calories	100
	% Daily Value
Total Fat 0g	0%
Sodium 15mg	1%
Total Carbohydrate 25g	9%
Total Sugars 25g	
Includes 25g Added Sugars	49%
Cholesterol 0mg	0%
Protein 0g	
Vitamin D	0%
Calcium	0%
Iron	0%
Potassium	0%
Not a significant source of calories from fat, saturated fat, trans fat, cholesterol, vitamin A, vitamin C, calcium and iron.	

INGREDIENTS

ORGANIC BREWED TEA (FILTERED WATER, FAIR TRADE ORGANIC BLACK TEA LEAVES) FAIR TRADE ORGANIC CANE SUGAR, ORGANIC LEMON JUICE FROM CONCENTRATE, ORGANIC LEMON EXTRACT, CITRIC ACID, ASCORBIC ACID (TO PROTECT TASTE).

<https://www.coca-colaproductfacts.com/en/products/honest-tea/peach-oo-la-long/16-oz/>

Accessed December 12, 2019



Nutrition Facts	
1 Serving Per Container	
Serving Size	1 Bottle
Amount Per Serving	
Calories	60
	% Daily Value
Total Fat 0g	0%
Sodium 0mg	0%
Total Carbohydrate	6%
16g	
Total Sugars 15g	
Includes 15g Added Sugars	30%
Cholesterol 0mg	0%
Protein 0g	
Vitamin D	0%
Calcium	0%
Iron	0%
Potassium	0%
Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron and potassium.	

INGREDIENTS

ORGANIC BREWED TEA (FILTERED WATER, FAIR TRADE CERTIFIED™ ORGANIC OOLONG AND BLACK TEA LEAVES), FAIR TRADE CERTIFIED™ ORGANIC CANE SUGAR, ORGANIC PEACH PUREE, ORGANIC AGAVE SYRUP, NATURAL AND ORGANIC FLAVORS, CITRIC ACID.

<https://www.coca-colaproductfacts.com/en/products/honest-tea/peach-oo-la-long/16-oz/>

Accessed December 12, 2019



Target.com
December 12, 2019

Nutrition Facts	
Serving size	1 can
Amount Per Serving	
Calories	80
	% Daily Value
Total Fat 0g	0%
Sodium 20mg	1%
Total Carbohydrate 21g	8%
Total Sugars 20g	
Includes 20g Added Sugars 40%	
Protein 0g	
Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron, and potassium	

INGREDIENTS: CARBONATED WATER, ORGANIC AGAVE, CITRIC ACID, GINGER EXTRACT, EXTRACTS OF CHILI PEPPER, CORIANDER, CARDAMOM, LIME, AND ORANGE.

Amazon.com
December 12, 2019



Instacart.com
 Accessed December 12, 2019

Nutrition Facts	
Serving size	1 can
Amount Per Serving	
Calories	60
<small>% Daily Value</small>	
Total Fat 0g	0%
Sodium 15mg	1%
Total Carbohydrate 15g	5%
Total Sugars 14g	
Includes 14g Added Sugars 28%	
Protein 0g	
<small>Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron, and potassium</small>	

INGREDIENTS: CARBONATED WATER, ORGANIC AGAVE, CITRIC ACID, GINGER EXTRACT, EXTRACTS OF CORIANDER, CARDAMOM, CHILI PEPPER, ORANGE, AND ROSE OIL.

Amazon.com
 Accessed December 12, 2019



Instacart
Accessed December 12, 2019

NUTRITION FACTS: SERV. SIZE: 1 BOTTLE
AMOUNT PER SERVING: **CALORIES 70**,
TOTAL FAT 0G (0% DV), **SODIUM** 0MG (0% DV), **TOTAL**
CARB 16G (6% DV), **TOTAL SUGARS** 16G (INCL. 16G
ADDED SUGARS, 32% DV), **PROTEIN** 0G. *% DV = % DAILY VALUE

INGREDIENTS: CARBONATED WATER, SUGAR, CITRIC ACID,
NATURAL FLAVOR, QUININE.

Amazon.com
Accessed December 12, 2019



NUTRIENTS	AMOUNT	% DAILY VALUE
Calories	90	+
Total Fat	0g	0%
Sodium	5mg	0%
Total Carbohydrates	22g	8%
Total Sugars	22g	+
Includes 21g Added Sugars		43%
Protein	0g	

** Caffeine is naturally occurring and actual amounts may vary.

Products may not be available in all areas

INGREDIENTS	
FILTERED WATER	+
SUGAR	+
TEA	+
NATURAL FLAVORS	+
CITRIC ACID	+

https://www.dpsgproductfacts.com/product/STRAIGHT_UP_SORTA_SWEET_TEA_18_5
December 12, 2019



Contains 1% Juice

Nutrition Facts	
Serving Size 1 can (473ml)	
Amount per serving	
Calories	80
	% DV*
Total Fat 0g	0%
Sodium 20mg	<1%
Total Carbohydrate 20g	1%
Total Sugars 20g	
Includes 20g Added Sugars	40%
Protein 0g	0%

Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron, and potassium.
 *%DV=%Daily Value

Ingredients: Filtered Water, Cane Sugar†*, Natural Flavors (Pomegranate, Blueberry & Other), Açai Juice‡, Lemon Juice‡, Green Tea†*

†* Organic - fair trade ‡ Organic

Caffeine content: 15 mg / can

<https://steaz.com/lightly-sweetened/>
 December 13, 2019



Contains 1% Juice

Nutrition Facts

Serving Size	1 can (473ml)
Amount per serving	
Calories	80
	% DV*
Total Fat 0g	0%
Sodium 20mg	<1%
Total Carbohydrate 20g	1%
Total Sugars 20g	
Includes 20g Added Sugars	40%
Protein 0g	0%
Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron, and potassium.	
*%DV=%Daily Value	

Ingredients: Filtered Water, Cane Sugar†*, Natural Flavors (Pomegranate, Mangosteen, Blueberry, Goji & Other), Açai Juice‡, Lemon Juice‡, Green Tea†*

†* Organic - fair trade ‡ Organic

Caffeine content: 15 mg / can

<https://steaz.com/lightly-sweetened/>

December 13, 2019



Contains 1% Juice

Nutrition Facts	
Serving Size	1 can (473ml)
Amount per serving	Calories 80
	% DV*
Total Fat 0g	0%
Sodium 20mg	<1%
Total Carbohydrate 20g	1%
Total Sugars 20g	
Includes 20g Added Sugars	40%
Protein 0g	0%
Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron, and potassium.	
*%DV=%Daily Value	

Ingredients: Filtered Water, Cane Sugar†*, Natural Flavors (Pomegranate, Lime & Other), Lemon Juice‡, Green Tea‡*

†* Organic - fair trade ‡ Organic

Caffeine content: 15 mg / can

<https://steaz.com/lightly-sweetened/>
December 13, 2019



Contains 4% Juice

Nutrition Facts

Serving Size 1 can (473mL)

Amount per serving

Calories 80

% DV

Total Fat 0g 0

Sodium 20mg <1

Total Carbohydrate 20g 1

Total Sugars 20g

Includes 20g Added Sugars 40

Protein 0g 0

Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron, and potassium

*%DV = %Daily Value

Ingredients: Filtered Water, Cane Sugar†*, Lemon Juice†, Green Tea†*, Natural Flavors

†* Organic - fair trade † Organic

Caffeine content: 15 mg / can

<https://steaz.com/lightly-sweetened/>

December 13, 2019



Contains 5% Juice

Nutrition Facts

Serving Size 1 can (473ml)

Amount per serving

Calories 80

% DV*

Total Fat 0g 0%

Sodium 20mg <1%

Total Carbohydrate 20g 1%

Total Sugars 20g

Includes 20g Added Sugars 40%

Protein 0g 0%

Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron, and potassium.

* %DV = %Daily Value

Ingredients: Filtered Water, Coconut Water†, Cane Sugar†*, Natural Flavors (Coconut & Other), Green Tea†*, Natural Flavors, Stevia†, Contains 5% Coconut Water

†* Organic - fair trade † Organic

Caffeine content: 15 mg / can

<https://steaz.com/lightly-sweetened/>

December 13, 2019



Contains 1% Juice

Nutrition Facts

Serving Size 1 can (473ml)

Amount per serving

Calories 80

% DV*

Total Fat 0g 0%

Sodium 20mg <1%

Total Carbohydrate 20g 1%

Total Sugars 20g

Includes 20g Added Sugars 40%

Protein 0g 0%

Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron, and potassium.

*%DV=%Daily Value

Ingredients: Filtered Water, Cane Sugar†*, Natural Ingredients (Grapefruit, Honey & Other), Lemon Juice†, Honey†, Green Tea†*, Lemon Extract†

†* Organic - fair trade † Organic

Caffeine content: 15 mg / can

<https://steaz.com/lightly-sweetened/>

December 13, 2019



Contains 1% Juice

Nutrition Facts	
Serving Size	1 can (473ml)
Amount per serving	
Calories	80
	% DV*
Total Fat 0g	0%
Sodium 20mg	<1%
Total Carbohydrate 20g	1%
Total Sugars 20g	
Includes 20g Added Sugars	40%
Protein 0g	0%

Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron, and potassium.
*%DV= %Daily Value

Ingredients: Filtered Water, Cane Sugar†*, Lemon Juice‡, Natural Flavors (Lemon, Ginger & Other), Green Tea†*, Lemon Extract‡

†* Organic - fair trade ‡ Organic

Caffeine content: 15 mg / can

<https://steaz.com/lightly-sweetened/>
December 13, 2019



Contains 1% Juice

Nutrition Facts	
Serving Size	1 can (473ml)
Amount per serving	
Calories	80
	% DV*
Total Fat	0g 0%
Sodium	20mg <1%
Total Carbohydrate	20g 1%
Total Sugars 20g	
Includes 20g Added Sugars 40%	
Protein	0g 0%
Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron, and potassium.	
* %DV=%Daily Value	

Ingredients: Filtered Water, Cane Sugar†*, Lemon Juice‡, Natural Flavors (Peach & Other), Green Tea†*

†* Organic - fair trade ‡ Organic

Caffeine content: 15 mg / can

<https://steaz.com/lightly-sweetened/>

December 12, 2019



Contains 0% Juice

Nutrition Facts	
Serving Size	1 can (473ml)
Amount per serving	
Calories	80
	% DV*
Total Fat 0g	0%
Sodium 20mg	<1%
Total Carbohydrate 20g	1%
Total Sugars 20g	
Includes 20g Added Sugars 40%	
Protein 0g	0%

Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron, and potassium.

* %DV = % Daily Value

Ingredients: Filtered Water, Cane Sugar†*, Natural Flavors (Mint & Other), Lemon Juice‡, Green Tea†*

†* Organic - fair trade ‡ Organic

Caffeine content: 15 mg / can

<https://steaz.com/lightly-sweetened/>

December 12, 2019



Nutrition Facts

Serving size 1 bottle

Amount per serving

Calories 80

% Daily Value*

Total Fat 0g 0%

Sodium 10mg 0%

Total Carbohydrate 20g 7%

Total Sugars 20g

Incl. 20g Added Sugars 40%

Protein 0g

Vitamin C 120mg 130%

Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron, and potassium.

INGREDIENTS:

PURIFIED WATER, ORGANIC CANE SUGAR, ORGANIC BLACK TEA, ORGANIC GINGER ROOT, NATURAL FLAVOR, ASCORBIC ACID (VITAMIN C).

<https://teastea.com/products/slightly-sweet/peach-ginger/nutrition>

December 13, 2019



Nutrition Facts

Serving size 1 bottle

Amount per serving
Calories 80

% Daily Value*

Total Fat 0g 0%

Sodium 10mg 0%

Total Carbohydrate 20g 7%

Total Sugars 20g

Incl. 20g Added Sugars 40%

Protein 0g

Vitamin C 120mg 130%

Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron, and potassium.

INGREDIENTS:

PURIFIED WATER, ORGANIC CANE SUGAR, ORGANIC GREEN TEA, ORGANIC FLAVOR, NATURAL FLAVOR, ASCORBIC ACID (VITAMIN C).

<https://teastea.com/products/slightly-sweet/pomegranate-blueberry/nutrition>

December 13, 2019



Nutrition Facts

Serving size 1 bottle

Amount per serving
Calories 80

% Daily Value*

Total Fat	0g	0%
Sodium	10mg	0%
Total Carbohydrate	20g	7%
Total Sugars 20g		
Incl. 20g Added Sugars		40%
Protein	0g	

Vitamin C 150mg 170%

Not a significant source of saturated fat, trans fat, cholesterol, dietary fiber, vitamin D, calcium, iron, and potassium.

INGREDIENTS:

PURIFIED WATER, BREWED TEA (ORGANIC GREEN TEA, ORGANIC DRIED MANGO), ORGANIC CANE SUGAR, ORGANIC FLAVOR, NATURAL FLAVOR, ASCORBIC ACID (VITAMIN C).

<https://teastea.com/products/slightly-sweet/mango-yuzu/nutrition>

December 13, 2019