

Dear Minister [insert name of the Minister/official at the *National Ministry of Health or the Ministry of Agriculture and Food/or the relevant national food safety and regulatory Agency*],

The [insert your organization], jointly with the Council of European Dentists (CED)¹, a non-for-profit organization representing the voice of European dentists at the level of EU Institutions, is reaching out to the [insert the competent department/authority] to urgently **call for action to address the current dramatic level of sugar consumption and intake in [insert country] and tackle the enduring high prevalence of preventable dental caries and periodontal diseases.**

In line with the World Health Organisation's (WHO) Global Action Plan on Oral Health 2023-2030², countries have direct responsibility to take actionable measures to reduce the burden of oral diseases. These actions include focusing on preventive solutions to health by adopting measures to tackle social and commercial determinants of health.

As part of its global targets, the WHO calls for an overall a 10% reduction in the global prevalence of the main oral diseases and conditions across the life course by 2030. To achieve this target, it sets a minimum proportion of countries that must have implemented comprehensive policy measures and regulations to reduce free sugars intake.

However, according to the WHO recommendations on free sugar intake³, **the quantity of free sugars currently absorbed by the European food industry exceeds by two-fold the quantity required to meet the recommended level of consumption by the European population.**

We are strongly concerned by the ongoing rates of sugar supply and population intake in the country, and particularly the lack of effective measures to impede sugar industry strategies in the areas of labelling, packaging design, marketing and advertising, particularly towards children and socio-economically disadvantaged groups,

¹ The Council of European Dentists (CED) is a European not-for-profit association which represents over 350,000 dental practitioners across Europe through 32 national dental associations and chambers in 30 European countries. Established in 1961 to advise the European Commission on matters relating to the dental profession, the CED key objectives are to promote high standards of oral healthcare and dentistry, and effective patient-safety centred professional practice.

² The Global Strategy and Action Plan on Oral Health, adopted by the 76th World Health Assembly on the 25 May 2023, is available here: <https://www.who.int/publications/i/item/9789240090538>

³ The World Health Organisation (WHO) recommends limiting free sugars intake to less than 10% of total energy and ideally to less than 5% total energy intake.

sponsorship of public and sports events, sugar content in all packaged food products and the availability of high-sugar food products.

Current policy measures fail to reduce the availability of sugar on the [insert country adjective] market and, consequently, fail to tackle the number one modifiable risk factor for dental caries.

We therefore call upon the [Ministry/Department] to take decisive action to adopt robust regulatory measures governing sugar industry activities, by:

- Implement national **taxes on high-sugar packaged products** and ultra-processed foods, beyond existing taxes on sugar-sweetened beverages.
- Allocate **earmarked taxes towards general and oral healthcare services** and programmes, supporting the delivery of primary services for vulnerable and disadvantaged population groups.
- **Adopt front-of-packet labelling requirements**, including comprehensive health warnings, the inclusion of recommended daily sugar intake, as well as considerations to develop pictorial health warnings.
- **Introduce nutritional standards for public services and amenities**, as well as **recommendations and training** for oral and health-centred public catering.
- Strengthen inter-ministerial policies and legislation to **restrict the marketing, digital advertising and promotion of high-sugar products** and **strictly regulate industry sponsorship** for all general and sporting events.

We would be glad to provide further information on this issue as well as the key role of oral and dental care for reducing the social and economic burden of sugar-preventable diseases.

We would like to request a **joint meeting with you and the [national Health Ministry/ Agriculture Ministry or Food Department]** at your earliest convenience.

We look forward to your response.

Sincerely,

SUGAR: A CRITICAL COMMERCIAL DETERMINANT OF HEALTH

Why Do We Need Urgent Action?

Sugar is not just a dental issue; it is a major public health barrier across the EU

#1 modifiable risk factor for dental caries.

Key driver and aggravating factor in tooth decay, periodontal disease, and oral cancer.

Dental Caries - Most common non-communicable disease worldwide.

Interconnected Health Threats: Periodontal diseases are associated with systemic inflammation and share sugar as common risk-factor, exacerbating diabetes, cardiovascular diseases, hypertension, dementia and chronic kidney disease.

Economic and Social Burden: The European Region has the highest prevalence of dental caries globally, leading to massive productivity losses and high paediatric hospitalisation rates.

Inequality and social gradient in risk factor exposure: Eastern European countries and underserved populations face significantly higher cavity rates due to sugar content and marketing disparities.

The amount of sugar in the European market is dangerously disconnected from health requirements.



Production: Estimated 15.7 million tonnes circulating on the European market (2024-2026)



Population Needs: WHO recommends less than 10% of daily energy from free sugars, ideally under 5%. For the EU/EEA/UK population, this equates to under 4.78 million tonnes of sugar per year.



Excessive Sugar Supply: Over 11 million tonnes of sugar is absorbed by the food industry in Europe every year.



WHO Global Targets: 50% of countries implementing policy measures to reduce free sugars intake by 2030.

Conclusion: Restricting sugar imports and cultivation is crucial for both public health, social, and environmental concerns.

Policy Recommendations: A multi-factorial approach for systemic health

To address the sugar-induced health, social and economic burden, the Council of European Dentists urges EU decision-makers to move beyond industry self-regulation:



Introduce EU-wide trade barriers and tariffs on imported raw sugar to limit surplus of free sugar supply on the European market.



Adopt an EU sugar-sweetened beverage (SSB) tax, extending taxation to ultra-processed foods, including confectionery, yogurts, and cereals.



Implement a comprehensive sugar advertising directive, to eliminate aggressive marketing, sugar industry sponsorship, and digital advertising of high-sugar products targeting children and adolescents.



Require mandatory front-of-packet labelling, including clear health warnings and visual representations of sugar-related diseases to empower consumer choices.



Strengthen the EU's nutrition policy and establish nutritional standards for public amenities, banning high-sugar products in schools, hospitals, and care homes, while integrating oral health education into the workplace and school curricula.



Implement oral health promotion strategies, sugar and oral health literacy and drive interprofessional collaboration, integrating oral health into systemic health measures

For full recommendations, please consult the [CED Resolution](#).

