



INTERNATIONAL CHEWING GUM ASSOCIATION

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Ministry of Health of Norway
Bodil Blaker, Director, Bodil.blaker@hod.dep.no
Bente Øvrebø, Bente.ovrebo@hod.dep.no

November 19, 2024

Dear Madam Director,

Re: Proposed Regulation on Restriction of Advertising and Marketing to Children

We are contacting you on behalf of the ICGA, the world leading organisation of chewing gum manufacturing companies¹. We have been made aware of a consultation by Norway's Ministry of Health to develop a new regulation intended to ban marketing practices of certain foods intended to be consumed by children, as well as to amend the Norwegian Food Act (n°124, Dec. 2003) to extend a new administrative police competency to the supervisory authority.

ICGA reads that the primary objective of the proposed restrictions is linked to some product distributions for foods mainly high in sugars, fats, saturated fats, and salt, when it relates to sugar-containing and chocolate-based confectionery products (entry #1 in the table of Annex 1). We understand the intent to include sugared chewing gum (and bubble gums) in the scope, even though sugared-chewing gum are delivered in small portions and packages, and consumed in reasonably low daily quantities, leading to marginally negligible energy and sugars daily intakes and near-zero daily intake for the other main macronutrients. We therefore ask for your confirmation that sugar-free chewing gum – chewing gum products sweetened with low-and-no calorie sweeteners – are excluded from that category n°1.

Sugar-free chewing gum products are universally recognized for their dental health benefits, in supporting the maintenance of tooth mineralization or neutralizing plaque acids, therefore reducing the risk factors that are leading to dental caries.

In that regard, we would like to draw your attention to EFSA scientific reviews which have duly established such health relationship with the consumption of sugar-free chewing gum after each eating and drinking occasions, and their related legally permitted health claims, relevant in the entire European Economic Area.¹

¹ See EU Register of Permitted Dental Health Claims related to Sugar Free Chewing Gum at <https://ec.europa.eu/food/food-feed-portal/screen/health-claims/eu-register> : • Sugar-free chewing gum helps neutralise plaque acid. Sugar-free chewing gum helps reduce tooth demineralisation. In [Commission Regulation \(EU\) 665/2011](#) • Sugar-free chewing gum contributes to the maintenance of tooth mineralization. Sugar-free chewing gum contributes to the neutralisation of plaque acids. Sugar-free chewing gum contributes to the reduction of oral dryness. Sugar-free chewing gum with carbamide neutralises plaque acids more effectively than sugar-free chewing gums without carbamide. [Commission Regulation \(EU\) 432/2012](#) • Chewing gum sweetened with 100% xylitol has been shown to reduce dental plaque. High content/level of dental plaque is a risk factor in the development of caries in children. [Commission Regulation \(EC\) No 1024/2009](#).

We remain at your disposal to engage further with you and your department into a constructive dialogue about this proposed regulation to confirm our mutual understanding what it is included in the product list.

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We thank you for this important opportunity to seek the above clarifications and we look forward to answering any question you may have regarding this submission.

Respectfully submitted,



Christophe Leprêtre (Ir. Agr.)
Executive Director, Regulatory and Scientific Affairs
ICGA secretariat



Richard F. Mann (Attorney at law)
Counsel to ICGA

This document is sent electronically by email.

ⁱ **About ICGA** -- *The International Chewing Gum Association (ICGA), headquartered in Washington, D.C. (USA), is the trade association of the world's leading producers of chewing gum, chewing gum base, and the ingredients used in these foods. ICGA members include Mars Wrigley, Perfetti Van Melle, Mondelēz International, Lotte, Arcor Group, Hershey, Ferrero, Cloetta, Fertin Pharma, Continental Confectionary Company, and many other companies, including ingredient suppliers to the industry.*

ICGA Contact Point: Please direct any inquiry to icga@gumassociation.org.