

## **RESOLVED,**

Shareholders of The Coca-Cola Company (“Coca-Cola” or the “Company”) request the Board of Directors issue a third party assessment, at reasonable expense and excluding proprietary information, on the Company’s efforts to assess and mitigate potential health harms associated with the use of non-sugar sweeteners (“NSS”).

The report should cover how the Company evaluates potential health impacts of NSS in its products, including governmental and other safety authorities/experts relied upon for NSS guidance, and the Company’s affiliation with and/or financial support of researchers/research institutions, international agencies, or reporting/regulatory bodies studying or making health or safety recommendations about NSS.

## **WHEREAS,**

The Access to Nutrition Initiative US Index 2022 ranked Coca-Cola last among eleven of the largest US food and beverage companies in delivering healthy, affordable products, noting that it was the only company in the Index without a nutrient profiling system.<sup>1</sup>

The World Health Organization recommended “against the use of non-sugar sweeteners (NSS) to control body weight or reduce the risk of noncommunicable diseases,”<sup>2</sup> and a 2022 meta-analysis found no associated long-term weight reduction benefits.<sup>3</sup> The International Agency for Research on Cancer classified NSS Aspartame - used in some Coca-Cola products - as “possibly carcinogenic to humans.”<sup>4</sup> A BMJ study found an increased risk of cardiovascular diseases, warning that NSS should not be used as a sugar replacement.<sup>5</sup> A 2022 study identified issues with memory in adults, associated with NSS consumption in youth, even at FDA-approved levels.<sup>6</sup>

Recent research found that prolonged NSS intake is associated with insulin resistance and glucose intolerance.<sup>7</sup> NSS is up to 20,000 times sweeter than sugar.<sup>8</sup> This intense increase in sweetness has been found to decrease palatability in less sweet food, like fruits, while increasing a drive to choose sweet food over other more nutritious options.<sup>9</sup>

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<sup>1</sup> <https://accesstonutrition.org/index/us-index-2022/>

<sup>2</sup>

<https://www.who.int/news/item/15-05-2023-who-advises-not-to-use-non-sugar-sweeteners-for-weight-control-in-newly-released-guideline>

<sup>3</sup> <https://pmc.ncbi.nlm.nih.gov/articles/PMC5764193/>

<sup>4</sup>

<https://www.iarc.who.int/news-events/aspartame-hazard-and-risk-assessment-results-released/>

<sup>5</sup> <https://www.bmj.com/content/378/bmj-2022-071204>

<sup>6</sup> <https://dornsife.usc.edu/news/stories/sugar-substitute-impair-memory-later/#>

<sup>7</sup> <https://jamanetwork.com/journals/jamapediatrics/fullarticle/2814105?resultClick=1>

<sup>8</sup>

<https://publications.aap.org/pediatrics/article/144/5/e20192765/38183/The-Use-of-Nonnutritive-Sweeteners-in-Children>

<sup>9</sup> <https://www.health.harvard.edu/blog/artificial-sweeteners-sugar-free-but-at-what-cost-201207165030>

Some South American countries require warning labels on products containing NSS.<sup>10</sup> Mexico requires warnings about NSS consumption in children, banning health-related claims and preventing child-focused marketing.<sup>11</sup> South Africa is poised to implement regulations requiring NSS warning labels in 2025.<sup>12</sup>

Coca-Cola states that 19 of its top 20 brands are NSS beverages, deemed safe according to testing done by “globally recognized food safety authorities.”<sup>13</sup> Governing food authorities are often decades behind in reviewing products. The FDA last reviewed/approved Aspartame in 1996<sup>14</sup> and Ace-K in 2003,<sup>15</sup> both of which are in Coke Zero and whose combination has been found to increase DNA damaging activity.<sup>16</sup>

As the Company moves to more NSS beverage options, youth, Black and Hispanic populations continue to be a focus, most recently with a Sprite Zero campaign that appeals to communities of color and Gen Z.<sup>17,18</sup> Trading a portfolio of sugary beverages for one of NSS products, and intentionally targeting associated advertising at populations more vulnerable to adverse health outcomes, warrants a robust review of impartial science.

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<sup>10</sup>

<https://www.worldobesity.org/news/new-who-guideline-advises-not-to-use-non-sugar-sweeteners-for-weight-control>

<sup>11</sup> <https://www.khlaw.com/insights/could-mexicos-new-warning-labels-trigger-labeling-laws-elsewhere>

<sup>12</sup>

<https://foodcomplianceinternational.com/industry-insight/news/3135-warning-labels-on-unhealthy-foods-mandatory-by-2025>

<sup>13</sup>

<https://www.coca-colacompany.com/content/dam/company/us/en/reports/coca-cola-business-sustainability-report-2022.pdf>

<sup>14</sup>

<https://www.fda.gov/food/food-additives-petitions/timeline-selected-fda-activities-and-significant-events-addressing-aspartame>

<sup>15</sup>

[https://www.ewg.org/news-insights/news/2023/11/use-sweeteners-exploding-despite-regulatory-vacuum?auHash=NbelqcDWytbX\\_vYHjXizCeJygwOusJWPdl6ZgAlhkBw](https://www.ewg.org/news-insights/news/2023/11/use-sweeteners-exploding-despite-regulatory-vacuum?auHash=NbelqcDWytbX_vYHjXizCeJygwOusJWPdl6ZgAlhkBw)

<sup>16</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8227014/#>

<sup>17</sup>

<https://lbbonline.com/news/sprite-zero-sugar-appeals-to-impatient-gen-z-with-asmr-fuelled-relaunch-campaign>

<sup>18</sup> <https://www.ana.net/miccontent/show/id/cs-2023-11-mca-sprite-zero-sugar-11595>