

September 9, 2021

Sh. Mansukh Mandaviya,
Hon'ble Union Minister of Health and Family Welfare,
Ministry of Health and Family Welfare, Government of India,
Nirman Bhawan, New Delhi.
Via Email and Fax.

Sub: *Call to Action on Strong Warning Labels on Front of Unhealthy Packaged Food to Protect People's Health*

Dear Sh. Mandaviya,

Greetings from the Public Health and Nutrition Advocacy (PHNA) Network!

We, the group of organisations working on public health for the last 3 decades in India, like to share our concerns and recommendations to reduce the negative impact of the consumption of ultra-processed food high in sodium, sugar and saturated fat on the health of Indians.

We collectively organised an event "**Role of Strong Warning Labels on Unhealthy Food Products in Protecting People's Health**" that discussed the need for adoption of front-of-pack warning labels on all food products high in sodium, sugar and saturated fat to safeguard people's lives from the looming crisis of non-communicable diseases in India.

One hundred and sixty-seven (167) participants, representing diverse domains including nutrition and health, academia and research, nutrition advocacy groups and individual consultants, national and international agencies, universities, colleges of community and home science, civil society organisations, public health organisations, experts, students and individuals participated in and contributed to rich discussions.

Four eminent experts provided impetus to the discussion by presenting overarching issues like consumer rights, identifying unhealthy foods, health risks of unhealthy foods, urgency of action for India, and how labelling of unhealthy foods can be done. Global evidence was shared on warning labels, which were considered to be the most effective at improving consumer understanding, influencing their purchase decisions and supporting healthy food choices.

Concerns: We understand that the food industry wants to delay and dilute the implementation of warning labels in India. Marketing of ultra-processed foods high in sodium, sugar and saturated fat is a health hazard for children and adolescents. Negative health impact of increasing consumption of these products includes several chronic non-communicable diseases such as obesity, diabetes and cardiovascular disease and all-cause mortality. This is of particular concern given that 50% of 5-19 years old population in India are suffering from cardio metabolic risk factors as per the Ministry of Health and Family Welfare's Comprehensive National Nutrition Survey of 2016-18.

Further;

Noting that countries such as Chile, are benefiting from strong warning labels by preventing the consumption of foods high in sodium, sugar and saturated fat;

Noting that Indians have the right to be protected from unsafe and unhealthy food through clear and unambiguous label information and appropriate warning in a manner that is easily comprehended by all, including those who cannot read under the Consumer Protection Act of 2019 ;

Noting that food industry is currently part of policy development process, which is an apparent conflict of interest;

We make following 4 recommendations:

We call upon the Ministry of Health and Family Welfare, Government of India, to direct and Food Safety Standards Authority of India (FSSAI) to:

1. Introduce a front of pack label (FOPL) on foods high in sodium, sugar and saturated fat as per WHO-SEARO specifications of nutrient cut offs.
2. Introduce easily comprehensible, such as “high in” warning labels on foods high in sodium, sugar and saturated fat.
3. Make FOPL a mandatory policy.
4. Keep the policy development process free from conflicts of interest through a guideline to identify, prevent and manage conflicts of interest.

We are glad to share the video link to the discussion held on 26th August, 2021.

https://www.youtube.com/watch?v=4FFUWL4ov_Q

We thank you for your kind attention and are willing to engage with the Ministry for further discussion of these issues.

We the undersigned:

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