

POLICY BRIEF

Warning Labels for Unhealthy Foods

Mandatory front of pack labelling (FOPL) using nutrition warning systems as an urgently required intervention in India to protect public health

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Introduction

- While a large section of the population continues to suffer from malnutrition, India faces a severe crisis of a sharply rising incidence of overweight and obesity with consequently high and rising prevalence of non-communicable diseases (NCDs).
- India's is termed as the 'diabetes capital of the world' with the diabetic population in the country estimated to hit 69.9 million by 2025 and 80 million by 2030 - an increase of 266%.
- One of the major determinants of this trend is known to be the over consumption of processed and ultra-processed foods (UPF) that contain high levels of salt, sugar and fat; the so-called 'critical nutrients and chemical additives'⁴ that are detrimental to public health.
- Across the globe, developed countries have shown an established nutrition transition to overweight and they have tried various methods to restrict the production and intake of these foods.
- This policy brief provides background information, scientific rationale and arguments for warning labels on front-of-pack for unhealthy foods.
- Recommendations are made to take urgent action and ensure mandatory provisions.

Consumption of UPFs

According to the analysis of Euromonitor Report, 2019⁸ for UPF consumption

- Sale of UPFs in India has increased from 2 kg per capita in 2005 to 6 kg in 2019, and is expected to grow to 8 kg by 2024.
- Sale of beverages has gone up from less than 2 litres per capita in 2005 to about 8 litres in 2019, and is expected to grow to 10 litres by 2024.
- According to other sources: already at 20L/capita in 2021

What is Front of Pack Labeling (FOPL)?

- It is simple, inexpensive, practical and effective tool to inform consumers about the public health implications of the food that they are purchasing for consumption.
- Arisen from Behavior Change Communication.
- Aim is reduction of overweight and obesity and consequent NCDs through the pathway of reduced consumption of foods that are too high in salt, sugar and fats as per standards set by the WHO (PAHO, 2021)

Why is FOPL needed?

- Ordinary labelling fulfills the statutory obligations of the producers to inform consumers of nutritional content, but it by no means facilitates sufficient understanding for decision-making.
- Consumers have neither time nor skills to interpret
- Considering the disease burden related to the consumption of highly processed foods: it is a required public health intervention.



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Strategies used across the globe to tackle over consumption of HFSS and UPFs

- Chile, Peru, Mexico, Israel and Uruguay already have FOPL nutrition warning systems in practice.
- Brazil, Columbia and Canada are likely to enforce it by 2022.

Is the FOPL recommendation new to India?

FOPL was first recommended in 2014 by an expert committee appointed by the FSSAI after the Delhi High Court order. In 2019, in order to make nutrition label information easy to understand and increase awareness among consumers for nutrition labels the concept of Front of Pack Labelling (FOPL) was introduced in The Food Safety and Standards (Labelling and Display) Draft Regulations. FSSAI then appointed a Working Group in the same year to review the thresholds for salt, sugar and fat as proposed in the Food Safety and Standards (Labelling and Display) Regulations, 2019.

Nutrition Alchemy (TNA) study

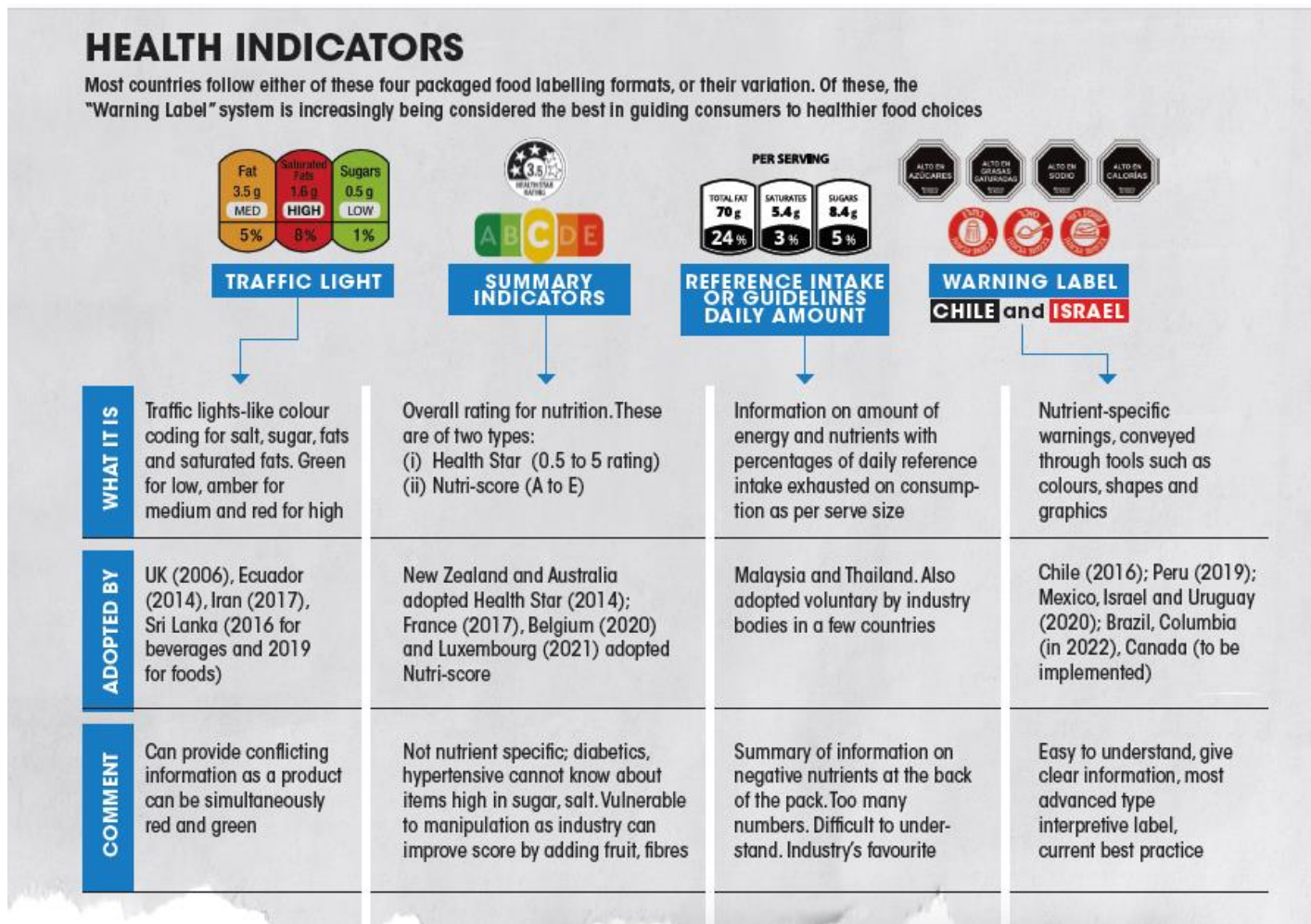
Commissioned by Food Safety and Standards Authority of India (FSSAI), 2020

- 1306 product samples representing 30 food and beverage companies
- 36 food categories including processed and ultra-processed foods
- 95.6% failed on one or other critical nutritional component
- 62.8% products failing on 3 and more nutrients
using WHO cut offs.....

What types of FOPL are in use and what are their differences?

- Health Star Rating (HSR) and Nutri-score (summary indicators)
- Guideline Daily Amount (GDA)
- Traffic Light labels
- Nutrition Warning Systems

Figure Courtesy with permission from the Editor of DTE Magazine: Cover Story Devil in the Details, Down to Earth Publication, 16-30 September, 2021



Current likelihood in India

- HSR
- Diluted WHO recommendations for Salt and Sugar presumably to accommodate more products under the threshold

Why is it not recommended to dilute WHO thresholds for the application of nutrition warning systems?

- FOPLs are merely providing critical information to the consumer in a way that it can be used to take informed decisions.
- It does not force the consumer to make a choice, nor does it impede the manufacturer from producing the food item in question, since a warning does not imply any legal violation.
- WHO threshold has been created by technical experts using relevant and reliable scientific evidence linking these thresholds to adverse health outcomes, there is no rationality in lowering the threshold for any reason.



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What is wrong with providing information on “positive nutrients”?

- If a dangerously unhealthy food contains some healthy ingredients like nuts, it still does not change the need for the warning.
- Providing specific information on this at the front of the pack causes confusion and a false sense of security or a ‘health halo effect’. Even half a star has a positive connotation.
- Information on the presence of ‘positive nutrients’ is there in the standard labelling on the back of the pack in case a consumer needs to have that information.
- These are merely tactics to derail the purpose of FOPL, which is to reduce consumption of foods excessive in salts, sugars, and fats.



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Are there economic implications of using FOPL warnings?

- Evidence shows that the use of FOPL has not adversely impacted producers.
- Tend to push companies to produce healthier foods and beverages.
- Unlike other mandatory processes such as mandatory fortification; the mandate for FOPL is merely to inform correctly, not to change the product per se.
- Some changes of labelling may be required across country borders, but this is not unusual for products, and companies have been dealing with these requirements to accommodate other trade considerations (such as varying taxes and languages) in the past.
- It is in public health interest and savings on health expenditures are likely to more than offset any losses elsewhere in the economy.

Recommendations

We make the following recommendations to FSSAI and Ministry of Health and Family Welfare, Government of India:

- FOPL nutrition warning system should be a mandatory part of a comprehensive plan to reduce the overall consumption of UPFs/foods high in salt, sugar and fat, including strategies such as education campaigns and soda taxes.
- W.H.O. thresholds for FOPL should not be diluted.
- FOPL should be free from any mention of positive nutrients.
- Images should be used rather than numbers on packaged food to enable interpretation by persons with poor literacy.
- FOPL should be immediately applied to new food products and stickers be used on products already on the shelves.

Thank you!