

Press Release

Public Health Experts Demand Clear Warning Labels on the Packaged Food Products in India

March 9, 2022, The Breastfeeding Promotion Network of India (BPNI), a 30-years-old NGO working towards protection, promotion and support of breastfeeding and child nutrition, in association with Nutrition Advocacy in Public Interest in India (NAPi), a national think tank on public nutrition, organised a webinar on “**Warning Labels or Health Star Rating (HSR) on Unhealthy Food Products: What Should India Choose.**” More than 200 public health and nutrition advocates participated. The webinar was co-chaired by Dr. Ashwani Mahajan (National Co-Convener of Swadeshi Jagaran Manch) and Dr. Vandana Shiva of Navdanya.

Dr. Arun Gupta, who is the convener of NAPi, welcomed the ongoing work of NITI Aayog and FSSAI towards the goal of reducing consumption of unhealthy foods in order to check the menace of Non-Communicable Diseases (NCDs) like diabetes, cancers, hypertension and heart disease.

In a recent meeting of the Stakeholders on Front of Pack Labelling, FSSAI [on 15 February 2022 has made a decision](#) to include ‘Health Star Rating (HSR)’ in the draft regulation based on a [study conducted by IIM Ahmedabad](#) that recommends HSR as the FOPL for India.

The bottom-line results of the IIM A study indicates, “For the group with a healthy prime warning labels and HSR produce the same effect on purchase of chips and biscuits with **warning labels being marginally ahead in terms of reducing purchase intention**”. And for the group with an unhealthy prime and with those with no prime warning labels are ahead of HSR. Looking at the particular effect to detect presence of excess of unwanted nutrients, warning labels are way ahead of the HSR. According to the report, **warning labels have more consistent good performance**. But the recommendation of HSR as the preferred choice, which does not even let the consumer understand the health risk, is therefore questionable.

Experts from Australia (using HSR) and Chile (Using Warning Label) shared their experience. Mark Lawrence, Professor of Public Health Nutrition at the Institute for Physical Activity and Nutrition, Deakin University, Australia highlighted the need to look at the science to guide adoption of labels and thresholds so they do not result in unintended consequences, and he shared the findings from his research team’s extensive evaluation of the impact of the HSR system on food labelling in Australia.

According to the public health expert from Chile, *Ms. Marcela Reyes Jedlicki*, Assistant Professor, Center for Research in Food Environments and Prevention of Chronic Diseases Associated with Nutrition (CIAPEC), Public Nutrition Unit, Univ. of Chile “ The Chilean Law (published in 2012) included the specification of warning labels after several years of discussion (the act was first presented in 2007, with traffic light labels). During the parliament discussion, qualitative data were done, which suggested the population did not understand the idea of traffic lights applied to food: participants had problems interpreting when different colors were present

(e.g., a food with 1 red label + 1 green label vs a food with 1 orange label). Thus, policymakers decided to simplify and use the warning labels. The Chilean regulation was implemented after the approval of this Law. Thus, for implementation, Health Authorities needed to decide on the format and text of warning labels, but could not change the warning nature of labels.”

There is a plethora of scientific [evidence](#) that clearly points towards using the warning labels on unhealthy food products with high sugar/salt or fats for a meaningful outcome. [In a modelling study](#) published in PLOS Medicine, 2020 after implementing warning labels in Mexico it is estimated that warning labels may effectively reduce obesity and obesity-related costs. Mexico is following Chile, Peru, and Uruguay in implementing warning labels to processed foods. India could benefit too from this intervention.

Evidence also suggests [ultra-processing of foods are inherently unhealthy](#). “Choice of the label should be based on science and public health interest must be at the center of debate,” said Dr. Gupta. He further added that “Decision to choose label should be kept free from commercial interest to avoid any conflicts of interest”. Industry loves the HSR because it does not reflect the nutrients of concern, misleads people who think that food products are healthy because of stars and aggressive marketing tactics. In Australia, where HSR was developed, it has received criticism as [food companies misused it as a marketing tool](#).

Packaged food products are usually projected as healthy using HSR as they receive ½ to 5 ‘Stars’, which give an impression of being good and more stars means healthy, which is misleading. This way consumption of substantially unhealthy food could increase and defeat the very objective for which FOPL is being designed. HSR can be confusing for consumers, if packaged food labels show any ‘health claim’ by using positive nutrients. Evidence suggests [HSR can be manipulated](#) as well to get a higher number of stars.

Dr. Vandana Prasad, Community Pediatrician, Founder & Secretary, PHRN, Member NAPI presented the 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*” and argued for a strong warning system to check the rise of obesity in India. She said “From the public health point of view, it makes little sense to dilute composite indicators like HSR with positive nutrients, thus defeating the very purpose of FOPLs. The HSR per se in any case does not allow the consumer to note which exact component is too high - salt, sugar or fat; again, defeating any advantage for patients.”

Dr. Ashwani Mahajan, National Co-Convener of Swadeshi Jagaran Manch also expresses his thoughts very firmly. During his address, he conveyed, “In my opinion unhealthy packaged food should have a ‘Warning label’ not a star rating, the reason being such foods are dismissive of our traditional food culture. Star would provide legitimacy to harmful products, high in salt, sugar and saturated fats. India therefore should desist from use of Health Star rating. A cursory look at the minutes of the meeting, in which the decision has been made, shows that there was an overwhelming presence of ultra-processed food manufacturers in the stakeholders meeting. Before taking a decision about ‘Front of Pack Labelling’, the opinion of other stakeholders such as more consumer representatives, nutrition experts and small-scale food processors, at least equal to the number of large-scale food processors, must be taken on board. From a consumer perspective, warning labels such as ‘High in Salt /Sugar or Fat’ would be best to reduce consumption of unhealthy foods.”

Dr. Vandana Shiva, Director of Navdanya, a global voice for food free from commercial interest, put her weight behind the general view that developed during the meeting, she said, “Warning labels are the need of the hour to curb the consumption of unhealthy and ultra-processed packaged food. Children are falling prey to demons of NCDs and this must stop.”

Commenting on this issue, Amit Khurana, Director, Sustainable Food Systems programme, Centre for Science and Environment (CSE), who is also a member of the stakeholder group constituted by FSSAI for FOPL, said "The current labelling system in India fails to inform how unhealthy packaged junk food is. Whereas, 'warning' labels are being adopted globally as they are simple and effective to inform consumers. India must adopt such symbol-based and nutrient-specific warning labels as it will also transcend the literacy and language barriers. On the contrary, the HSR system, if adopted, will do more harm than good. It not only can mislead the consumers but also exacerbate the NCD crisis as bad food can be sold as good food."

Mr. Ashim Sanyal, CEO, Consumer Voice also a member of the stakeholder group constituted by FSSAI for FOPL said “A bold step of regulating unhealthy foods has now become a whimper because of FSSAI moving towards industry adjustments not only for labels but also with the high threshold levels. Choosing HSR label instead Warning labels will not help consumer choice and high threshold levels for salt, sugar and saturated fats leaves unhealthy foods starred as healthy. Besides, a voluntary grace period of 5 years for implementation makes it an eyewash FOPL regulation ignoring the voices of consumer organisations, medical fraternity and scientific experts.”

Mr. George Cherian of CUTS International said, “Insertion of simplified nutrition information on the front of food packages is a cost-effective strategy to guide consumers make healthier choices and discourage them from consuming foods that are high in salt, sugar, fat, the critical nutrients causing rise in NCDs.”

Analysis by using the Australian HSR Calculator reveals that *biscuits* or *chips* of various brands with the sugar content ranging from 21 to 38 grams, energy levels ranging from 454 kcal to 513 Kcal or sodium levels ranging 643 to 1080 mg per 100 grams. (all more than the FSSAI proposed thresholds), and the product is still getting 1, 2 or 1 and 1/2 star without identifying these key nutrient of concern. “Where is the provision in the HSR to give a ZERO score if any of the nutrient of concern goes higher than the threshold”, asked Prof HPS Sachdev, an eminent epidemiologist and researcher of India as he summed up the session. He added, “Presence of some protein or fiber in the foods does not take away the risk of high sugar/salt or the food being ultra-processed. Warning labels therefore are a preferred choice.”

ABOUT BPNI <https://www.bpni.org/> **About NAPI** <http://www.napiindia.in/>

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Notes for the Editors

- [Evidence of Warning Labels](#)
- [Policy Brief](#)
- Perspective: The Escalating Health Threats from Ultra-processed and High Fat, Salt, and Sugar Foods: Urgent Need for Tailoring Policy
<https://indianpediatrics.net/mar2022/193.pdf>
- [HSR V/S Warning Labels Comparison Table](#)