

NUTRITION ADVOCACY IN PUBLIC INTEREST-India (NAP*i*)

April 4, 2022

To,
Shri Arun Singhal, IAS
Chief Executive Officer
Food Safety Standards Authority of India (FSSAI)
Government of India, New Delhi.

Sub: Science Based Front of Pack Labels (FOPL) on Unhealthy Food Products

Dear Shri. Singhal,

We have been in touch with you regarding the ultra-processed foods and upon your kind consideration we did submit a concept paper "Inclusion of ultra-processed foods within the regulatory framework A concept note for the Scientific Committee (SC) of the FSSAI". It is as a follow up we write again.

We are aware that Food Safety and Standards Authority (FSSAI) is currently developing a FOPL for the unhealthy food products and has decided to include 'Health Star Rating' in the draft regulation as indicated in the minutes of the stakeholders meeting of 15th February, 2022.

Being aware that NCDs like diabetes, cancers and heart attacks constitute majority of annual deaths in India, and the strong association of ultra-processed unhealthy diet with such diseases, we believe that to minimise the burden of NCDs, the reduction of rising consumption of unhealthy food products is pivotal. The current scientific evidence favours an urgent action on the FOPL front, with an unambiguous preference for warning labels, particularly in setting like India where the literacy levels are sub-optimal. The evidence does not support adoption of the Health Star Rating FOPL.

We would like to submit the following key scientific evidence on these issues as below.

- A higher consumption of ultra-processed foods (>4 servings daily) was independently associated with a 62% relatively increased hazard for all cause mortality <https://www.bmj.com/content/365/bmj.l1949>
- A recent meta-analysis of studies on the association between ultra-processed food intakes with all-cause mortality showed that compared to low consumption, high consumption of UPF increased death risk by 29%. <https://pubmed.ncbi.nlm.nih.gov/35231930/>
- A meta-analysis of five experiments assessing the **effects of Health Star Rating (HSR) labels on sales found no significant effect** on calories or sugar consumed; similarly, combined findings from three research indicated no impact on saturated fat or salt purchased. <https://onlinelibrary.wiley.com/doi/epdf/10.1111/jhn.12758>
- In a systematic review, evidence from interventions on the effect of front-of-package (FOP) nutrition labeling on food purchases showed that 3 studies on health star ratings **did not reveal an effect on food purchases** compared with the control. <https://pubmed.ncbi.nlm.nih.gov/33517247/>
- The most effective label in reducing perceived healthfulness was HIWL ('High-in' Warning Labels), which communicates clear, non-quantitative messages about high levels of nutrients of concern and demonstrated the greatest efficacy in

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reducing the perceived healthfulness of a sweetened fruit <https://pubmed.ncbi.nlm.nih.gov/34726144/>.

- For more scientific evidence on impact of warning labels, https://www.bpni.org/wp-content/uploads/2022/04/Sc-Evidence-for-warning-and-HSR-labels-on-unhealthy-food_-30-March.pdf

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The FSSAI's decision is based on a report by IIM-Ahmedabad, which recommended using health star rating, which is questionable. However, recent evidence from two more national studies done by IIPS Mumbai, and AIIMS conglomerate has been ignored; these studies unambiguously found warning labels to be superior in reducing intention to purchase harmful foods.

We, therefore strongly recommend the following based on scientific evidence.

1. Front-of Pack Labeling on unhealthy food products be made mandatory and urgently as a strong measure to curb the consumption of unhealthy food products.
2. Warning labels should be used as preferred choice for this purpose and should be included in the relevant FSSAI Regulation.

NAPi would be happy to discuss this issue further with you,

With our warm regards,

Yours Sincerely,

Members of the Nutrition Advocacy in Public Interest (NAPi)

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Copy to Dr. Harsh Vardhan, MP (Lok Sabha) Former Minister of Health, Government of India.