

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

March 23, 2022

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To

**Shri Piyush Goyal  
Hon'ble Minister  
Ministry of Consumer Affairs, Food & Public Distribution,  
Government of India**

**Sub: Concerns about Consumers Right to know what is inside the packaged food**

Hon'ble Minister Shri Piyush Goyal Ji,

We are a group of independent experts within a national think tank on nutrition – consisting of experts in epidemiology, human nutrition, community nutrition and pediatrics, medical education, administration and management. We have decades of experience in our respective fields. We have come together since 2016 to advocate on nutrition policy in public interest.

As you may be aware of the fact that India is facing a public health crisis of rising obesity, diabetes, cancers, hypertension and cardiac diseases (Non-Communicable Diseases (NCDs)). In India, it is estimated that nearly 5.8 million people die from NCDs every year and it has huge negative impact on socio-economic development of the country.

At the same time consumption of unhealthy packaged food and drinks is rising in India. These products are usually high in sugar, salt or bad fats and are ultra-processed; increasing consumption is associated with high health risks of NCDs. Therefore, it is logical to halt the rise in consumption of these food/drink products.

Policy development is currently being considered by MOHFW/FSSAI to put up a front of the pack label (FOPL) on the unhealthy packaged food. FSSAI has recommended including 'Health Star Rating (HSR)' in the draft regulation as the FOPL for India.

*"...HSR may be incorporated in the draft regulations and the stakeholders may provide their comments on the same as per due procedure."*

There is global evidence and experience that health star rating is deceptive, potentially manipulable and the consumer cannot identify the unhealthy nutrient content, e.g. whether the food product has high sugar content. It is also being said that health star rating may increase the consumption of unhealthy foods.

On the other hand, there is robust scientific evidence that proves warning labels significantly reduce the consumption of unhealthy foods and are much better than other types of labels. Warning labels inform the consumer about the true nature of the packaged food and alerts them on the health risk it poses on them. Warning labels have worked successfully in the curbing tobacco consumption in India and is a proven best practice in influencing consumer's purchase intention.

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Decision to include HSR in the draft regulation may undermine consumers rights to know the amount of sugar, salt and bad fat in the packaged food to protect their health.

India is looked upon by the world, it cannot be expected to set a trend that does not favour the consumer's rights. In addition, Government of India should make efforts to invest in health and wellbeing of people especially children as they are the prime target of aggressive marketing of such foods.

We seek your support and therefore request you to intervene and write to Hon'ble Health Minister to help change this decision. Scientifically we urge you to adopt warning labels as the FOPL for India. It will be a political triumph in public health and consumer's interest.

We request for an appointment with you to explain the matter personally to you.

We will be happy to assist in any manner.

Look forward to a positive response,

With thanks and kind regards,

Yours Sincerely,

Members of the Nutrition Advocacy in Public Interest (NAPi)

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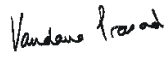
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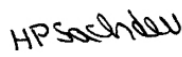
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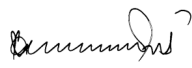
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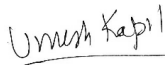
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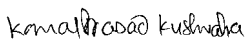
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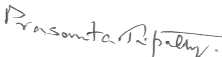
  
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