What Does Junk Food Deserve? Stars, Or Warnings?

Prominent pictorial labels for high sugar, salt, fat levels can instantly alert consumers

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A triple burden of malnutrition – undernutrition, micronutrient malnutrition, as well as overweight and obesity – is rising in India. Paradoxically, these forms of poor nutrition often have the same nutritional root cause. More nourishing freshly cooked home-foods or more natural foods are being replaced by cheaper preprocessed packaged alternatives with high levels of salt, sugar and fat that fill the stomach, but do not nourish and in fact promote ill health and disease.

India is the diabetic capital of the world, with the highest concentration of diabetics in any single country. Hypertension closely follows, leading to an overall non-communicable disease (NCD) burden reaching epidemic proportions. A major pathway leading here is the rise of overweight and obesity, as a consequence of poor diets combining with sedentary lifestyles.

India must heed countries that have already experienced this disastrous nutrition transition and taken appropriate countermeasures. Fortunately, government *does* seem to be alerted. Front of Packet Labelling (FOPL) was under Food Safety and Standards Authority of India (FSSAI) consideration for some years and introduced in The Food Safety and Standards (Labelling and Display) Draft Regulations in 2019. Subsequently, many studies and expert committees were commissioned by FSSAI to determine specifics to enable implementation.

Eye-catching can also be misleading

- Publicly available FSSAI documents suggest three directions seeming to find favour but each has invited some contestation. The first pertains to the form FOPL should take, considering that summary scores, guideline daily amount, traffic light labels and nutrition warning systems have been used in different countries. The choice for India seems to have narrowed down to FSSAI favouring Health Star Ratings (HSRs) based on summary scores and Nutrition Warning Labels (WLs) being demanded by civil society organisations and experts.

No nourishment here

Essentially, there's contention that HSRs wouldn't allow consumers to distinguish the reason for a particular star rating (a food product high in salt might be star rated the same as one high in sugar, or as a relatively less processed food) since summary indicators can only indicate the net result of a variety of sub-calculations. This wouldn't help a diabetic or hypertensive patient. Additionally, mere presence of a 'positive nutrient', like some nuts or fruit, would enhance the star rating of a fundamentally unhealthy food like fruit-and-nut chocolate.

WLs, in contrast, can point to higher than desirable levels of specific elements, each carrying its own pictorial warning. HSR would give stars from half to five for all foods alike: Even the unhealthiest food would get some golden star – a symbol of goodness. Experts have likened this to providing a "health halo" to unhealthy foods to obfuscate issues for the consumer. Further, experts in countries using HSR for some years such as Australia warn of their ineffectiveness in influencing consumer behaviour. WLs, obviously, have a common-sense advantage over HSR and have significantly impacted consumer behaviour in countries like Chile.

Follow science, follow WHO

- The second issue of contention is thresholds: WHO has set certain standards to declare foods to be too high in sugar, salt and fat for different regions. An FSSAI study found that 62.8 % of foods on shop shelves in India would fail for all three nutrients of concern and 96% for one of WHO thresholds. However, standards under consideration by FSSAI are 2-3 times higher for total sugar in foods and beverages and 1.8 times higher for salt, which is a basic flaw. Such dilution of standards would allow the majority of packaged food products to slip through the net.
- The third point of contention revolves around making adoption of FOPL voluntary or mandatory. Countries like Australia follow the former, Chile and co the latter. Most evidence points to industry failing to comply adequately with voluntary FOPL. In Australia, only a quarter of products complied with HSR labelling many years after it was proposed. India's current plans seem to indicate that whatever form FOPL takes, it would become mandatory only by 2027, giving many years of leeway to the industry while NCD acceleration continues unabated.

How will FSSAI swing?

In the preference for HSR over WL, raising of thresholds, or delays in making FOPL mandatory, it appears that the 'big food' industry is gaining an advantage. This perception is further stoked by FSSAI's stakeholder meetings being heavily populated by representatives of food processing multinationals.

All evidence points to the need for mandatory FOPL warning systems without any dilution of WHO standard thresholds to raise consumer awareness and reduce consumption of ultra-processed foods. In the face of what should be considered a public health emergency, this really needs to happen immediately and without any other consideration whatsoever.

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