

Soon To Be Introduced Front-Of-Pack Labelling Will Work Only With A Clear Interpretative Logo

WHY IT IS IMPORTANT TO READ BEFORE YOU EAT PACKAGED FOOD

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When was the last time you looked at what's written on the pack? What if a warning message were printed clearly in front of the pack, would that help in making healthier choices?

The burden of obesity and diet related non-communicable diseases (NCDs) like diabetes, hypertension, and heart disease are rapidly on the rise across the country. The recently released National Family Health Survey 5 report (2019-2021) by the Union health ministry showed obesity at the national level has increased from 21% to 24% among women and from 19% to 23% among men. More than a third of women in Tamil Nadu, Kerala, Delhi, Andhra Pradesh and Punjab are overweight or obese.

One of the main reasons for lifestyle diseases is the change in our dietary habits, with more consumption of processed and ultra-processed foods, which are often high on salt, sugar and/or fats.

It has been observed that one of the significant global responses to the NCD epidemic is the provision of nutritional information on food packs. However, it has become evident that such information, usually provided at the back of the pack, fails to adequately inform consumers. It is either difficult to notice and understand, or the information provided is confusing with no details about the presence of high salt, sugar and fats.

There are also other barriers like illiteracy and language. Thus, as part of national strategies to contain NCDs, several countries have introduced labelling on the front of pack. The main purpose of the front of pack labels is to warn consumers about the presence of increased quantities of negative nutrients like salt, sugar and fat, and nudge them towards healthier food choices.

Defining science-based limits for the nutrients of concern in various food products and having appropriate label design are the two important components of front of package labelling (FoPL). In 2018, FSSAI proposed a draft Food Safety and Standards (Labelling and Display) Regulations, 2018, highlighting certain criteria for labelling and display on the front of food packs. The FSSAI also laid down the thresholds for sugar, salt/sodium



MAKING OF FOPL

LABEL DESIGN

and fats for various foods and beverages, which were in line with the WHO-South-East Asia Regional Office science-based model. Faced by opposition from the industry, the FSSAI developed a modified set of thresholds in 2019 based on a study validated in accordance with the Indian context. This was also similar to the WHO-SEARO proposed model. This also faced resistance from packaged food companies. While a fresh group of experts is finalizing the threshold levels of nutrients of concern, it's the design that is in debate now.

An IIM-Ahmedabad study, commissioned by the FSSAI, reveals that health star rating (HSR) design for FoPL is the most preferred choice of consumers, followed by warning labels. But consumer advocates, health experts and doctors say HSR on a one star to 5-star basis will only confuse consumers. A healthier packaged food will have a higher star rating similar to the star rating of electronics based on their power-saving capacity. Such a rating is an average of nutrients and can easily hide the individual negative ingredients, thus misleading consumers.

Take the example of Revathi, a daily wageer from Tiruvannamalai, who is diagnosed to be hypertensive and the doctor advises her to reduce her intake of salt. However, she picks up the usual packaged food product without realising that it contributes to her condition. In case of a design on the front of the pack (an interpretative logo), which gives her a clear warning that the product is high on salt, there

> A working group constituted by Food Safety and Standards Authority of India (FSSAI) recommended front-of-pack labelling (FoPL) on packaged foods in 2014

> In 2018, FSSAI introduced the draft front of package labels for packed food under the Food Safety and Standards (Labelling and Display) Regulations, 2018, which was in line with WHO's proposed threshold model. Shelved due to industry pressure

> In 2019, FSSAI in collaboration with Nutrition Alchemy did a study to understand the Indian market and came up with a revised set of thresholds. Again, this was almost similar to the WHO model. Industry refused to accept

> In January 2021, FSSAI restarted the consultation process

> FSSAI formed a working group of experts to define thresholds for food categories. The working group came up with an initial set of thresholds that were much higher than the WHO model. Consumer groups opposed this as it was against consumer interest and working group was asked to relook at the prescribed threshold levels

> FSSAI proposed the health star rating. Consumer groups opposed it as it would suppress the presence of negative nutrients if other positive nutrients were also present in the food, thus giving a better star rating

> FSSAI engaged IIM-Ahmedabad for a study on design labels. The consumers surveyed preferred HSR design, followed closely by warning labels

> AIIMS too did a similar study and the findings revealed that warning labels were consumers' preferred option

> FSSAI has decided to go with HSR

PRESENT LABEL SYSTEM

> Nutritional information is given on the back of packed food products as per Food Safety and Standards (Packaging and Labelling Regulations), 2011

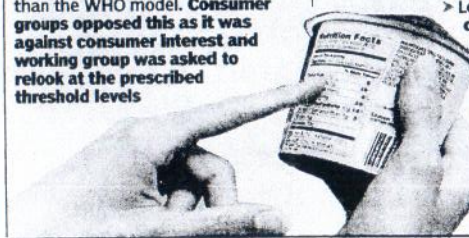
> Because of the scientific terms, the nutritional information is not easily understandable

> Most people don't read and understand English

> Legibility is a concern

> Small food packets don't contain all the nutritional information

> Back of pack does not particularly mention nutrients of concerns



are higher chances that she will remember her doctor's advice. Revathi might still buy it as it is something she likes, but the frequency of purchase is likely to reduce. And there lies the importance of FoPL. In addition, this would also motivate the food industry to consider reformulation.

An HSR design is problematic as increased presence of nutrients of concern may be suppressed by other healthier nutrients. So, despite the presence of increased salt, sugar and/or fat, the product may get a better star rating, thus defeating the purpose of FoPL, which is reducing the instances of NCDs. Further, consumers will not precisely know if a packaged food product is high on salt, sugar or fat and will therefore not be able to make an informed choice based on their requirement or condition.

A clear, interpretative warning label that will transcend the barriers of illiteracy and multiple languages in the country and would convey the message effectively is most suited for India. The best example would be the vegetarian and the non-vegetarian logo that is best understood by all.

Countries like Chile, Uruguay, Peru, Israel follow warning labels and studies show that they have started to reap the benefits from positive consumer behaviour and reformulation by the industry, since the implementation of FoPL. Chile became the first country in the world to implement the FoPL law in 2016, after observing a steep increase in cases of obesity among adults and school children. Chile's ministry of health started publishing annual assessments since then. In 2018, the majority of consumers considered labels while buying and around 58.4% chose foods with fewer warning labels.

Having invested much time and energy on introducing FoPL, it is crucial that FSSAI determine science-based thresholds for the presence of salt, sugar and fat in food categories and come up with an interpretative, label design that would benefit Indian consumers. It is also equally important that the authorities issue, mandatory regulations at the earliest, instead of the proposed voluntary one, so that FoPL could act as a crucial tool in containing NCDs in the country.

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