

Technical Brief

Policy to Reduce the Consumption of Packaged Food Products with High Fat/Salt/Sugar

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 58 Lakh people die from NCDs every year out of total deaths of about 90 Lakhs. Obesity in Indian men and women has gone up by almost 25% in the past five years. Diabetic population in the country is estimated to hit 69 Crore by 2025 and 80 Crore by 2030. More than half of the 5-19 year olds show biomarkers of NCDs in India. Consumption of unhealthy high fats, salt or sugar (HFSS) food/beverage products is rapidly rising in India. Several of these food products are ultra-processed, highly profitable, intensely appealing and intrinsically unhealthy. Scientific evidence is more than clear to say that consumption of these foods are associated with high risks of NCDs.

Policies for Reducing Consumption

The World Health Organisation and global public health scientists recommend three policies. Fiscal policy for higher taxation, marketing restrictions, and front of the pack label (FOPL) label to alert/warn consumers.

Current Status of Policy in India

FSSAI is developing the FOPL policy. GST is high on sugary beverages. Aggressive marketing of several of these unhealthy food products persists despite guidelines. The Consumer Protection Act and Food Safety and Standards Act define misleading ads.

Concerns

Decision taken by the FSSAI to include Health Star Rating (HSR) as a preferred FOPL in its draft regulation. Secondly, the FSSAI has also decided to adopt a higher threshold of nutrients of concern than recommended by WHO and, lastly, an allowance of 4 years before being mandated.

Solutions for FOPL Policy: Warning Labels on Unhealthy Food Products

Scientific evidence and experience from countries like Chile, Mexico, Israel has shown that “High in Fat/Salt/Sugar” warning labels can significantly reduce the consumption of calorie, sodium and sugar, from food and beverage purchased. Warning labels are simple to communicate in a true manner.

Why are 'Health Stars' a problem?

May not have any effect on consumption, creates a 'health halo' and declares all food products to be safe in varying degrees. It is deceptive as the consumer cannot identify the unhealthy nutrient like salt or sugar that a consumer may want to know. It can be manipulated to get more stars e.g. by adding little fibre or nuts to the unhealthy food product, which may still remain high in fat/salt/sugar.

Recommendations to reduce consumption of unhealthy food products

1. India should adopt Warning Label as FOPL, make it mandatory within a year, and based on cut offs as recommended by WHO.
2. India should meanwhile also begin to prepare a legal framework to restrict marketing of HFSS foods especially targetted at children and adolescents.
3. India should consider the highest GST slab for these and in addition 'zero' for healthy foods.



Technical Brief is prepared by NAPI and PHFI.

Nutrition Advocacy in Public Interest (NAPI) <http://www.napiindia.in/>, a national think tank on nutrition –consisting of independent experts in epidemiology, human nutrition, community nutrition and pediatrics, medical education, administration and management; having decades of experience in respective fields; has come together to advocate on nutrition policy in public interest.

Public Health Foundation of India (PHFI) <https://phfi.org/>

The Public Health Foundation of India (PHFI) is a not for profit public - private initiative, which represents a "Partnership for Public Purpose". PHFI is a response to the limited public health institutional capacity and was established to strengthen training, research and policy through interdisciplinary health system connected education and training, policy and programme relevant research, evidence based & equity promoting policy development, affordable health technologies, people empowering health promotion & advocacy for prioritised health causes in the area of Public Health in India. The setting up of PHFI was enabled by the Government of India in 2006 (registered as a Society). The Foundation is headquartered in New Delhi and its constituent Indian Institutes of Public Health (IIPH) established by PHFI have a presence in Hyderabad (Andhra Pradesh), Delhi NCR, Gandhinagar (Gujarat), Bhubaneswar (Odisha), Shillong (Meghalaya) and Bengaluru (Karnataka). The Foundation is managed by an empowered governing board comprising senior government officials, eminent Indian and international academic and scientific leaders, civil society representatives and corporate leaders.

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Fig. 1. Trends of Per Capita Sales of Ultra processed foods in India 2006-2019. (Euromonitor Data)

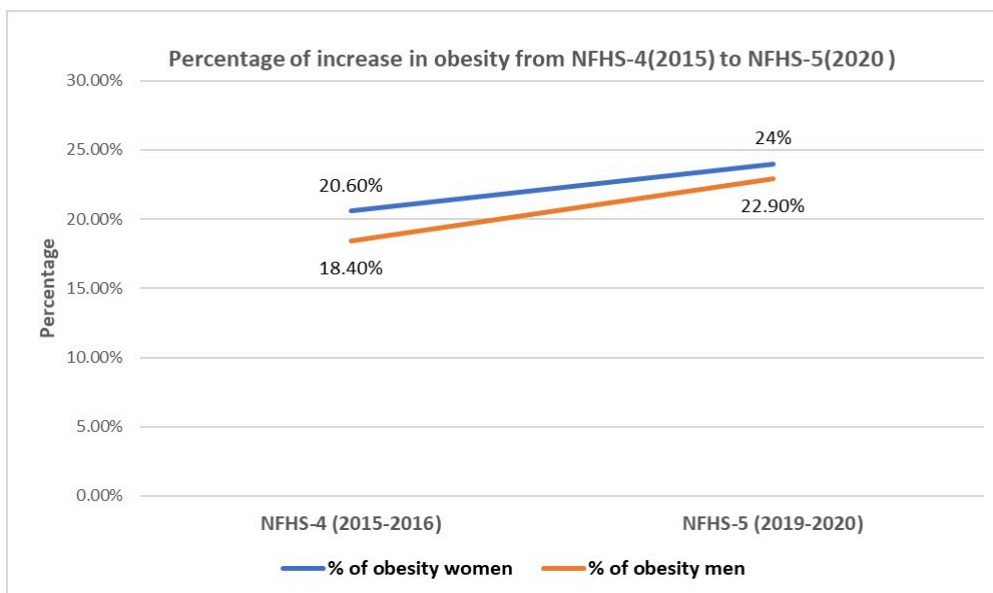
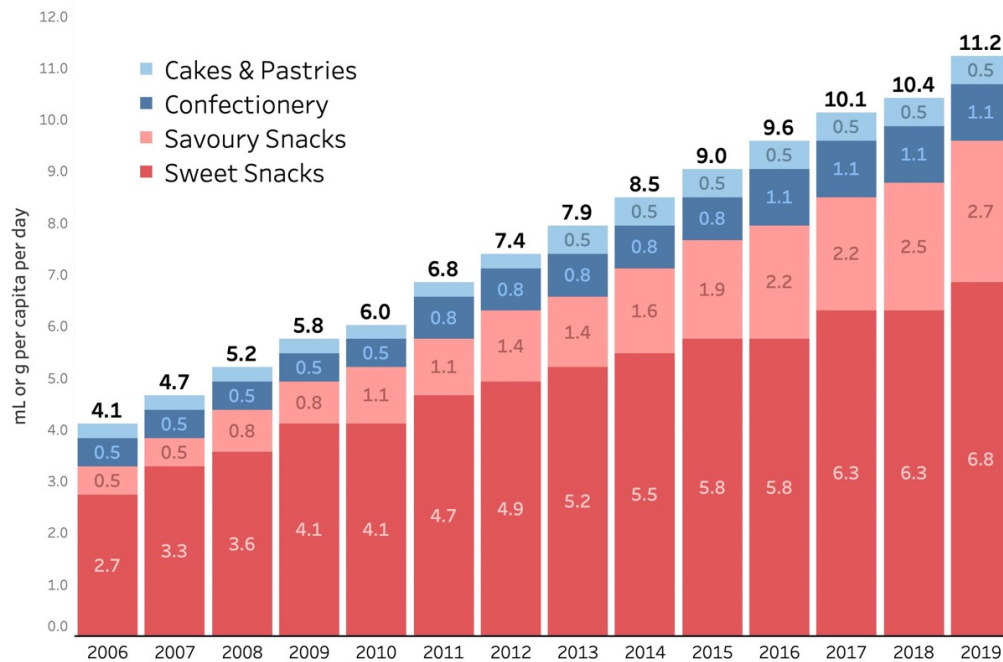


Fig. 2 Rise in Obesity in India both in men and women 2015-2020

Health Star Rating vs. Warning Labels-Key Points



HEALTH WARNING: Consuming products with added sugar(s) contributes to obesity, diabetes, and tooth decay.

Health Star Rating (HSR) Label	Warning Label (WL)
Confusing, too many numbers, difficult to understand	Easy to interpret, consistent, clear, true, easily understandable, alerts the consumer to specific nutrient high in the food product.
Give weightage to use of Positive nutrients (Protein, Dietary fiber and Fruits, vegetables, nuts and legumes (FVNL) to increase Star Rating assuming that such nutrients will negate the health risk.	Does not give weightage to positive nutrients. Based only on Nutrients of concern like fat, salt and sugar.
Signals healthfulness, does not identify unhealthy foods e.g. 'High Sugar for diabetics or high salt for hypertensive persons	It signals risk to health (as used in Cigarettes) and facilitates quick identification of unhealthy food products e.g. high sugar or salt to benefit people's health.
May not decrease consumption of unhealthy foods	Shown to decrease consumption of unhealthy foods in Chile and Mexico
It can be manipulated by adding positive nutrients.	It cannot be manipulated. It is direct.
Industry prefers "Stars" as it has minimal effect on market	Industry does not like Warning on food packets.
Allows industry making health claims and use as a marketing tool.	It does not allow health claims or use as marketing tool
It is used in Australia, NZ	Used in many countries in Latin America, Israel.