

# NUTRITION ADVOCACY IN PUBLIC INTEREST-India (NAPi)

14<sup>th</sup> June 2023

To,  
**Sh. Narendra Modi,**  
**Hon'ble Prime Minister,**  
**Government of India,**  
**South Block, Raisina Hill,**  
**New Delhi-110011**

Hon'ble Prime Minister Shri Modi Ji,

We write to you on behalf of the Nutrition Advocacy in Public Interest (NAPi <http://www.napiindia.in/>), which is 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; who have come together to advocate on nutrition policy in public interest.

NAPi has reviewed the new publication on the prevalence of diabetes in India to be 11.4%, (1 in 9 individuals), prediabetes -15.3% (1 in 7 individuals), hypertension- 35.5% (1 in 3 individuals), generalised obesity- 28.6% (1 in 4 individuals, abdominal obesity -39.5% (1 in 3 individuals) and Hypercholesterolemia -24% (1 in 4 individuals).

NAPi is pleased to share its **Statement on the Rise of Diabetes in India 'Prevention is Better than Cure'**.

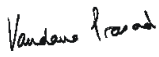
It analyses the new report and existing guidelines on control of NCDs. NAPi believes that prevention efforts should take a front seat in our efforts to control non-communicable diseases.

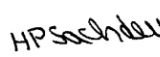
Therefore, NAPi requests your kind intervention to consider our recommendations, which include revising the current operational guidance of the national NCD control programme and a legal framework or even an ordinance to tackle this problem head on through warning people about unhealthy food products and controlling their marketing.


NAPi would be willing to join in any discussions in this regard.

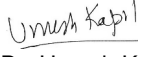
Yours Sincerely,

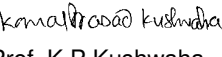
Members of the Nutrition Advocacy in Public Interest (NAPi)

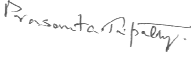
  
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## CC:

1. Dr. Mansukh Mandaviya, Minister of Health and Family Welfare, GOI
2. Sh. Rajiv Gauba, Cabinet Secretary of India
3. Sh. Amit Khare, Advisor to PM
4. Sh. Rajesh Bhushan, Secretary, Ministry of Health and Family Welfare, GOI

June 2023

## **NAPi Statement on the Rise of Diabetes in India**

# **Prevention is Better than Cure**

Nutrition Advocacy in Public Interest (NAPi) has developed this statement to respond to a new publication that shows prevalence of diabetes to be 11.4%, (1 in 9 individuals) and of prediabetes -to be 15.3% (1 in 7 individuals). This statement analyses the report, existing guidelines on control of NCDs and emphasises the role of prevention, especially focusing on ultra-processed diet related morbidity and mortality. It recommends revising the current operational guidance of the national NCD control programme, effective policy response in the form of a legal framework or even an ordinance to tackle this problem head on. Prevention efforts through warning people about unhealthy food products and controlling their marketing deserves the attention of MOHFW, Government of India.

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**NUTRITION ADVOCACY IN PUBLIC INTEREST-India (NAPi)**  
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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.

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## NAPi Statement on the Rise of Diabetes in India Prevention is Better than Cure

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The Nutrition Advocacy in Public Interest (NAPi <http://www.napiindia.in/>) is 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; who have come together to advocate on nutrition policy in public interest.

NAPi welcomes the “Metabolic non-communicable disease health report of India: the ICMR-INDIAB national cross-sectional study” (ICMR-INDIAB-17) published on June 7 in the *Lancet Diabetes Endocrinol* 2023<sup>i</sup>. It is commendable indeed that the Indian Council of Medical Research and the Ministry of Health and Family Welfare jointly funded the new comprehensive epidemiological study. The results from this nationally representative study are worrying health risks.

The report shows prevalence of diabetes to be 11.4%, (1 in 9 individuals), prediabetes -15.3% (1 in 7 individuals), hypertension- 35.5% (1 in 3 individuals), generalised obesity- 28.6% (1 in 4 individuals, abdominal obesity -39.5% (1 in 3 individuals) and Hypercholesterolemia -24%(1 in 4 individuals). Estimated numbers of people who suffer in India are staggering; 10.1 crore of diabetics, 13.6 crore of pre-diabetics, 31 crore with high blood pressure, 25.4 crore being obese and 21.3 crore having hypercholesterolemia.

NAPi is truly concerned over the national health of people of India given the fact that diabetes, high blood pressure and being overweight are major risk factors for heart disease and deaths. Therefore, NAPi agrees with the report that it warrants urgent state-specific policies and interventions to arrest the rapidly rising epidemic of metabolic NCDs in India. The report calls for urgent government-level measures for prevention, early detection and treatment of NCDs, through strengthening of the public health-care system and reorientation of priorities in provision of health care. It is also quite clear from the report that urgent measures are required to prevent or delay NCDs especially when there is limited availability of resources for provision of optimal diabetes care. However, the report does not make specific recommendations on prevention of diabetes including the reasons of increased consumption of unhealthy food products, and how these are marketed, which has a major role to play.

NAPi’s core work has been to alert the governments for more than 6 years on the risks of non-communicable diseases (NCDs) associated with increasing consumption of ultra-processed foods and or food products high in saturated fat, sugars and salt/sodium (HFSS). Since it requires evidence to frame a policy, NAPi has been closely monitoring and analysing available evidence and based on that NAPi has come up with a policy brief<sup>ii</sup> and position statement<sup>iii</sup>. Based on evidence NAPi believes strong steps are needed to evaluate the diets of infants, young children, adolescents and adults in relation to contents and marketing of the pre-packaged food products, which are becoming mainstream.

Believing it to be critical to act urgently and halt the rising and high prevalence of diabetes, action would be required to first set right the revised operational guidance of the National programme for prevention and control of non-communicable diseases (2023-2030. This guideline currently deals with prevention as “**a) Prevention and health promotion:** The CHC is involved in promotion of healthy lifestyle through health education and counselling to the patients and their attendants at the time of their visit to CHC. The NCD Counsellor recruited under the programme counsels on the merits of healthy diet, importance of physical activity, harmful effects of tobacco and alcohol,....”<sup>iv</sup>

The Government of India and State governments will have to **define the contours of prevention and reach out to all not only those who reach the health centre as sick**. While State governments are primarily responsible for providing health care, the Central government can lead the effort with policy frameworks for prevention of NCDs. The report alerts us to an acceleration of disease burden in coming years, which should serve as a stark reminder to policymakers of India. Therefore, NAPI recommends revising guidelines with thrust on **prevention**.

NAPI would like to reiterate its earlier recommendation with the growing evidence that unhealthy diets, rich in ultra-processed food products, or high in sugars or carbohydrates are major dietary risk factors for diabetes. One study even points out that each **10% increase** in UPF [ultra-processed food] consumption (kcal/d) was associated with a **15% higher risk of T2DM** [type-2 diabetes mellitus] among adults.”<sup>v</sup> Further there is enough evidence to say that billion-dollar marketing and advertising of unhealthy foods increases their consumption. NAPI believes that this is not the fault of the people who tend to eat unhealthy food products but the environment, which makes them do so.

The report underlines the need for urgent action to come up with a **legal framework or even an ordinance considering the Article 123 of the Constitution of India**<sup>vi</sup> that provides for power to the President to promulgate an ordinance if circumstances exist. Nothing could beat this alarming report on India’s health. It could tackle the rising trend of consumption of unhealthy food or drink products, which are ultra-processed or High Fat, Sugar and Salt (HFSS). This could include the following provisions:

- a) Definition of “healthy foods” inter alia several other definitions to be inserted
- b) Warning labels on unhealthy foods
- c) Restricting the marketing of unhealthy foods.
- d) Warning messages to people on the risks of unhealthy foods (in all languages)

This recommendation is based on several years of pending action on warning labels, and ineffective control on misleading advertisements of unhealthy food products<sup>vii</sup>. Most of the advertisements were found misleading. The legal framework may go a long way in reducing non-communicable disease or halting its rise.

Governments of South Africa, Norway and Mexico have recently taken similar action. India can demonstrate its commitment to pin down rise of diabetes.

NAPI, therefore, once again, like to suggest that the Hon'ble Prime Minister of India directed the Ministry of Health to take “immediate action” in this regard. NAPI hopes that all political parties would support this effort as in the case of tobacco treaty or making a law to protect breastfeeding from the marketing of baby foods.

**Ends.**

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<sup>i</sup>[https://www.thelancet.com/journals/landia/article/PIIS2213-8587\(23\)00119-5/fulltext](https://www.thelancet.com/journals/landia/article/PIIS2213-8587(23)00119-5/fulltext)

<sup>ii</sup><https://www.napiindia.in/docs/Policy-brief-FOPL-Feb-22.pdf>

<sup>iii</sup><https://napiindia.in/docs/Position-Statement-English.pdf>

<sup>iv</sup>National Program for Prevention and Control of Cancer, Diabetes, Cardiovascular Diseases and Stroke. [https://dghs.gov.in/content/1363\\_3\\_NationalProgramme\\_PreventionControl.aspx](https://dghs.gov.in/content/1363_3_NationalProgramme_PreventionControl.aspx)

<sup>v</sup>Moradi S, Hojjati Kermani MA, Bagheri R, Mohammadi H, Jayedi A, Lane MM, Asbaghi O, Mehrabani S, Suzuki K. Ultra-Processed Food Consumption and Adult Diabetes Risk: A Systematic Review and Dose-Response Meta-Analysis. *Nutrients*. 2021 Dec 9;13(12):4410. doi: 10.3390/nu13124410. PMID: 34959961; PMCID: PMC8705763. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8705763/>

<sup>vi</sup><https://www.constitutionofindia.net/articles/article-123-power-of-president-to-promulgate-ordinances-during-recess-of-parliament/#:~:text=Article%20123%3A%20Power%20of%20President,of%20Parliament%20%2D%20Constitution%20of%20India>

<sup>vii</sup>Gupta A, Bidla N, Joshi Y, Prasad V, Sachdev HS, Kumar P. Advertising of Pre-Packaged Foods in India: A Qualitative Analysis. *Indian Pediatr*. 2023 Apr 20:S097475591600529. Epub ahead of print. PMID: 37078482.