

# NUTRITION ADVOCACY IN PUBLIC INTEREST-India (NAPi)

February 14, 2024

To,  
**Smt. Justice Ranjana Prakash Desai,**  
**Chairperson,**  
**Press Council of India,**  
**7, Teen Murti Marg,**  
**New Delhi-110011**

**Sub: Seeking Intervention and Amendment to the Press Council Act 1978**

Dear Justice Desai,

We feel honoured to approach you as Nutrition Advocacy in Public Interest (NAPi): A national think tank on nutrition –consisting of independent experts in epidemiology, human nutrition, community nutrition and paediatrics, medical education, administration, social work and management. The members have decades of experience in their respective fields and have come together since 2016 to advocate on nutrition policy in public health interest.

We like to bring to your kind attention an important public health concern affecting health of all Indian consumers through Newspaper advertising of the unhealthy food and beverage products(also called High Fat/Sugar and Salt (HFSS) foods or ultra-processed foods). It is well known such marketing increases consumption of the unhealthy diet displacing healthy diets. Furthermore, these food products are reported to be addictive in nature. Increased consumption of such products is a major risk factor for rapidly increasing obesity and diabetes in India. According to a recent Government of India study 1 in 4 adults suffer from diabetes or pre-diabetes.

Attached two recent examples, full page advertisements of chocolate brands 'Amul' and 'Kisses'. Both these are ultra-processed food products and classified as HFSS. (Annex-1,2). The advertisements fail to make a mention of the most important information -its high sugar or fat content. For your quick reference here is the Total Sugar and Saturated Fat content of the two products is as follows.

1. **Hershey's Kisses:**  
Sugar-47.5 Gms. per 100 Gms. And Saturated fat 34 Gms /per 100 gms.
2. **Amul Milk Chocolate:**  
Sugar-33.7 Gms /per 100 Gms. And Fat 37.9 Gms. per 100 Gms.

While occasional intake may be acceptable, the World Health Organisation SEARO advises thresholds for marketing restrictions. These are 6 Gms. /100 Gms for sugar and 8 Gms/100 Gms. for fat. Our analysis reveals that both these advertisements are 'misleading' going by the definition of the Consumer Protection Act 2019 section 2(28)(iv) wherein any product of service "deliberately conceals important information"

Since the newspaper advertising is controlled by the Norms of Journalistic Conduct 2010 under Press Council Act 1978, we would like to request you to please **consider the following steps:**

1. **An amendment of the provisions of the Section 36 (ii) of the 'Conduct'** to include ban advertisements of high sugar, high fat and high salt (HFSS) food /beverage products and ultra-processed food products.

## CONVENER

Dr. Arun Gupta  
Child Health & Nutrition  
Advocate  
Email [arun.ibfan@gmail.com](mailto:arun.ibfan@gmail.com)  
Mobile: 9899676306

## MEMBERS

Prof. HPS Sachdev  
Senior Pediatrician &  
Epidemiologist

Dr. Vandana Prasad  
Community Pediatrician

Prof. KP Kushwaha  
Pediatrician & Former  
Principal, BRD Medical  
College Gorakhpur

Dr Prasanta Tripathy  
Co Founder Ekjut

Prof. Umesh Kapil  
Professor, Dept of  
Epidemiology,  
Biostatistics And Clinical  
Research, I LBS

Dr. J.P. Dadhich  
Child Health & Nutrition  
Advocate

Ms. Nupur Bidla  
Social Work Professional

Ms. Reema Dutta  
Public Health and Nutrition  
professional

## ADDRESS

NAPi  
BP-33, PITAMPURA,  
DELHI-110034  
CONTACT NO- 42683059

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2. **Secondly** we would also like you to include a ban on “misleading advertisements” as defined by the Consumer Protection Act.

This step will go a long way in protecting the health of people of India. We hope to hear from you a positive response.

We would be happy to meet and discuss this matter further. Therefore seek an appointment with you.

Look forward to hear from you,

With my best regards

Sincerely,

## CONVENER

Dr. Arun Gupta  
Child Health & Nutrition  
Advocate  
Email [arun.ibfan@gmail.com](mailto:arun.ibfan@gmail.com)  
Mobile: 9899676306

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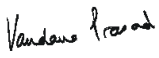
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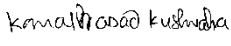
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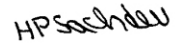
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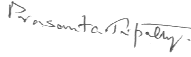
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Social Work Professional


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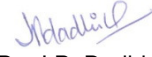
  
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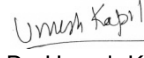
  
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Prof. Dept of Epidemiology,  
Biostatistics and Clinical  
Research, Institute of Liver &  
Biliary Sciences, ND

  
Nupur Bidla  
PhD Scholar (Social Work)

**Cc:**

**Shri Nungsanglemba Ao, Secretary, Press Council of India for Necessary Action**  
**Shri. Apurva Chandra, Secretary, Ministry of Health and Family Welfare**  
**Ms. Neerja Sekhar, Additional Secretary, Ministry of Information & Broadcasting**

**Encl. AA**

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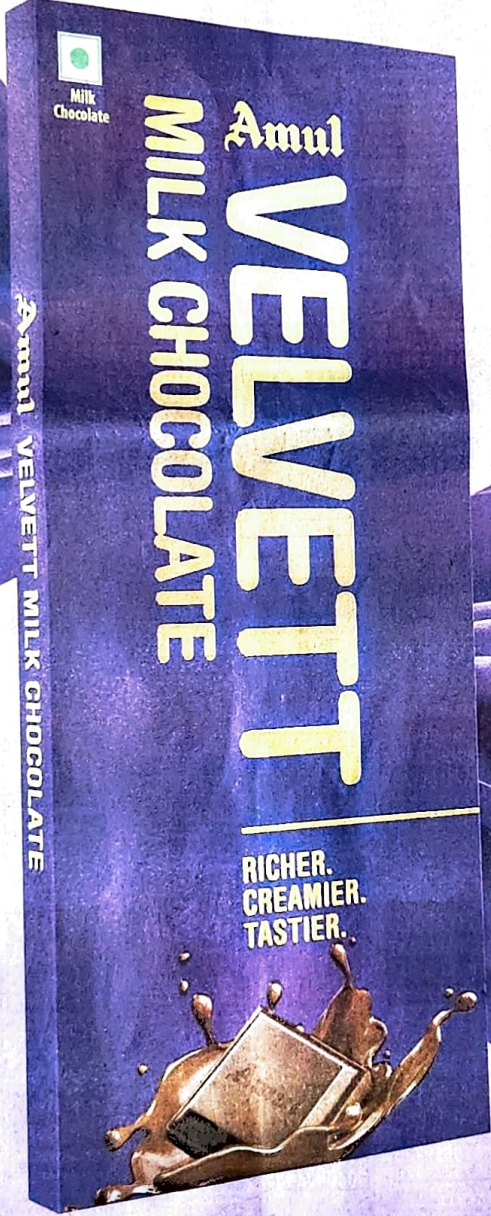
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