



## **Effective Policy Response to Reduce Junk Food /HFSS consumption and Best Practices**

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Across the globe, many countries have shown an established nutrition transition to overweight and they have tried various methods to restrict the production and intake of these foods.



### 3 Key policy responses aimed at reducing the consumption of junk food/HFSS

- Front of Pack Labelling (Warning Labels)
- Marketing Regulation
- Taxation policy

# FRONT OF PACK LABELLING (WARNING LABELS)

# WHO UNICEF suggests thresholds and recommend FOPL for reducing consumption of junk foods/HFSS



# HEALTH INDICATORS

Most countries follow either of these four packaged food labelling formats, or their variation. Of these, the "Warning Label" system is increasingly being considered the best in guiding consumers to healthier food choices

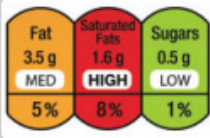

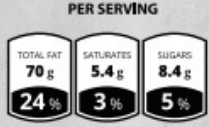

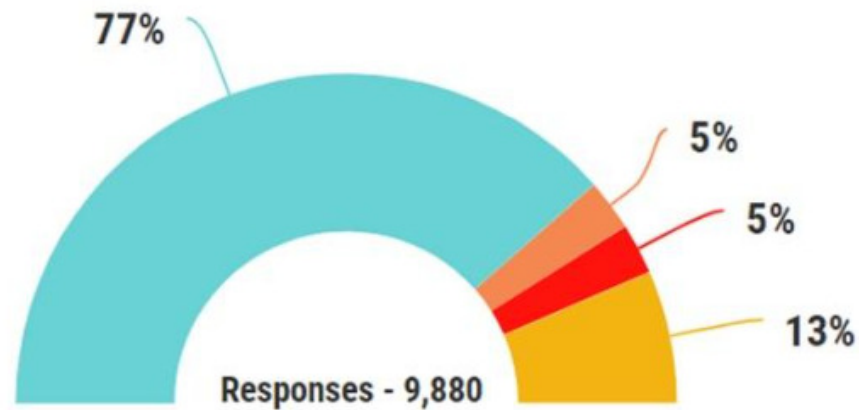
	 <p><b>TRAFFIC LIGHT</b></p>	 <p><b>SUMMARY INDICATORS</b></p>	 <p><b>REFERENCE INTAKE OR GUIDELINES DAILY AMOUNT</b></p>	 <p><b>WARNING LABEL</b> <b>CHILE and ISRAEL</b></p>
WHAT IT IS	Traffic lights-like colour coding for salt, sugar, fats and saturated fats. Green for low, amber for medium and red for high	Overall rating for nutrition. These are of two types: (i) Health Star (0.5 to 5 rating) (ii) Nutri-score (A to E)	Information on amount of energy and nutrients with percentages of daily reference intake exhausted on consumption as per serve size	Nutrient-specific warnings, conveyed through tools such as colours, shapes and graphics
ADOPTED BY	UK (2006), Ecuador (2014), Iran (2017), Sri Lanka (2016 for beverages and 2019 for foods)	New Zealand and Australia adopted Health Star (2014); France (2017), Belgium (2020) and Luxembourg (2021) adopted Nutri-score	Malaysia and Thailand. Also adopted voluntarily by industry bodies in a few countries	Chile (2016); Peru (2019); Mexico, Israel and Uruguay (2020); Brazil, Columbia (in 2022), Canada (to be implemented)
COMMENT	Can provide conflicting information as a product can be simultaneously red and green	Not nutrient specific; diabetics, hypertensive cannot know about items high in sugar, salt. Vulnerable to manipulation as industry can improve score by adding fruit, fibres	Summary of information on negative nutrients at the back of the pack. Too many numbers. Difficult to understand. Industry's favourite	Easy to understand, give clear information, most advanced type interpretive label, current best practice

Figure 1 Courtesy with permission from the Editor of DTE Magazine: Cover Story Devil in the Details, Down to Earth Publication, 16-30 September, 2021<sup>13</sup>

# Survey by Local Circles Social Media Platform, 2023

Instead of the FSSAI proposed star rating system, 77% consumers survey want atleast ultra-processed foods be identified with a front of the pack RED label

*(Should ultra-processed foods be identified with a front of the pack Red Label instead of the star rating system proposed by FSSAI?)*



19000 responses  
from 285 Districts

- Yes, absolutely
- No, it should be star rating only like other packaged food products
- No, there should be no marking on such products
- Can't Say



Source : <https://www.localcircles.com/a/press/page/ultra-processed-foods-survey>, Jan 12, 2023

# Indian evidence for warning label

- NIN report (2023) discourage the consumption of even moderately unhealthy foods
- FOPNL has to act as a preventive tool and discourage consumers from consuming nutrients of concern.
- Warning Label appear to be a better option.

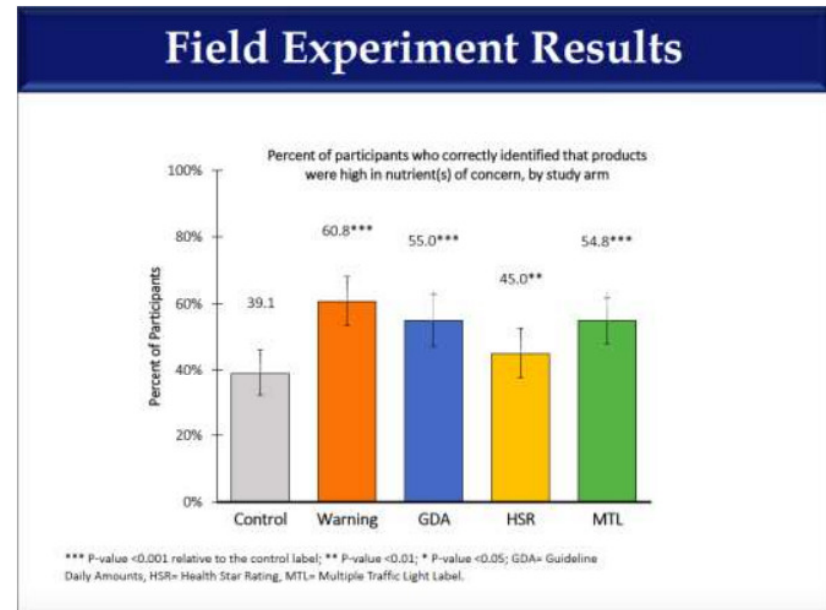


Source: [https://www.nin.res.in/survey\\_reports/fopnl\\_report.pdf](https://www.nin.res.in/survey_reports/fopnl_report.pdf)



# Front-of-Package Labels on Unhealthy Packaged Foods in India: Evidence from a Randomized Field Experiment( Singh et al. 2022)

- The Study results suggest that **warning labels found to be most promising for helping Indian consumers identify “high-in” products**, though these findings should be replicated in a behavioral trial in which actual purchases or intake behaviors are measured.
- The **HSR system was the lowest performing FOPL** (relative to the control) with regard to helping consumers identify “high-in” products.
- **Warning labels were most frequently chosen** as the label that would most discourage consumption by adults or feeding the products to children.
- The warning label is the **optimal FOPL to achieve the goal of informing consumers** about packaged foods and drinks high in nutrients of concern.



Evidence from India: % Participants correctly identify that product is High in Nutrients of Concern (Food Risk Factors) (Singh et al; 2022)

# Global Evidence supporting the effectiveness of warning labels as FOPL

> PLoS Med. 2020 Jul 28;17(7):e1003221. doi: 10.1371/journal.pmed.1003221. eCollection 2020 Jul.

## Predicting obesity reduction after implementing warning labels in Mexico: A modeling study

Ana Basto-Abreu<sup>1</sup>, Rossana Torres-Alvarez<sup>1</sup>, Francisco Reyes-Sánchez<sup>1</sup>, Romina Gonzalez-Morales<sup>1</sup>, Francisco Canto-Osorio<sup>1</sup>, M Arantxa Colchero<sup>2</sup>, Simón Barquera<sup>3</sup>, Juan A Rivera<sup>4</sup>, Tonatiuh Barrientos-Gutierrez<sup>1</sup>

Affiliations + expand

PMID: 32722682 PMID: PMC7386611 DOI: 10.1371/journal.pmed.1003221

Free PMC article

### Abstract

**Background:** In October 2019, Mexico approved a law to establish that nonalcoholic beverages and packaged foods that exceed a threshold for added calories, sugars, fats, trans fat, or sodium should have an "excess of" warning label. We aimed to estimate the expected reduction in the obesity prevalence and obesity costs in Mexico by introducing warning labels, over 5 years, among adults under 60 years of age.

**Methods and findings:** Baseline intakes of beverages and snacks were obtained from the 2016 Mexican National Health and Nutrition Survey. The expected impact of labels on caloric intake was obtained from an experimental study, with a 10.5% caloric reduction for beverages and 3.0% caloric reduction for snacks. The caloric reduction was introduced into a dynamic model to estimate weight change. The model output was then used to estimate the expected changes in the prevalence of obesity and overweight. To predict obesity costs, we used the Health Ministry report of the impact of overweight and obesity in Mexico 1999-2023. We estimated a mean caloric reduction of 36.8 kcal/day/person (23.2 kcal/day from beverages and 13.6 kcal/day from snacks). Five years after

[Public Health Nutr.](#) 2022 Apr; 25(4): 1094–1104.

Published online 2021 Nov 2. doi: [10.1017/S1368980021004535](https://doi.org/10.1017/S1368980021004535)

PMCID: PMC9991717

PMID: [34726144](https://pubmed.ncbi.nlm.nih.gov/34726144/)

## Impact of front-of-pack labels on the perceived healthfulness of a sweetened fruit drink: a randomised experiment in five countries

Alejandra Jáuregui,<sup>1\*</sup> Christine M White,<sup>2</sup> Lana Vanderlee,<sup>3</sup> Marissa G Hall,<sup>4</sup> Alejandra Contreras-Manzano,<sup>1</sup> Claudia Nieto,<sup>1</sup> Gary Sacks,<sup>5</sup> James F Thrasher,<sup>6,7</sup> David Hammond,<sup>2</sup> and Simón Barquera<sup>1</sup>

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[PLOS Med.](#) 2021 Oct; 18(10): e1003765.

Published online 2021 Oct 5. doi: [10.1371/journal.pmed.1003765](https://doi.org/10.1371/journal.pmed.1003765)

PMCID: PMC8491916

PMID: [34610024](https://pubmed.ncbi.nlm.nih.gov/34610024/)

## Impact of color-coded and warning nutrition labelling schemes: A systematic review and network meta-analysis

Jing Song, Conceptualization, Data curation, Formal analysis, Methodology, Visualization, Writing – original draft, Writing – review & editing,<sup>1</sup> Mhairi K. Brown, Conceptualization, Data curation, Formal analysis, Writing – original draft, Writing – review & editing,<sup>1</sup> Monique Tan, Conceptualization, Writing – review & editing,<sup>1</sup> Graham A. MacGregor, Writing – review & editing,<sup>1</sup> Jacqui Webster, Conceptualization, Writing – review & editing,<sup>2</sup> Norm R. C. Campbell, Conceptualization, Writing – review & editing,<sup>3</sup> Kathy Trieu, Conceptualization, Writing – review & editing,<sup>2</sup> Cliona Ni Mhurchu, Conceptualization, Writing – review & editing,<sup>2,4</sup> Laura K. Cobb, Conceptualization, Writing – review & editing,<sup>5</sup> and Feng J. He, Conceptualization, Data curation, Writing – review & editing<sup>1,\*</sup>

Gaston Ares, Academic Editor

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> [Pediatrics.](#) 2016 Feb;137(2):e20153185. doi: 10.1542/peds.2015-3185. Epub 2016 Jan 14.

## The Influence of Sugar-Sweetened Beverage Health Warning Labels on Parents' Choices

Christina A Roberto<sup>1</sup>, Diandra Wong<sup>2</sup>, Aviva Musicus<sup>3</sup>, David Hammond<sup>4</sup>

Affiliations + expand

PMID: 26768346 DOI: 10.1542/peds.2015-3185

### Abstract

**Background and objectives:** US states have introduced bills requiring sugar-sweetened beverages (SSBs) to display health warning labels. This study examined how such labels may influence parents and which labels are most impactful.

**Methods:** In this study, 2381 demographically and educationally diverse parents participated in an online survey. Parents were randomly assigned to 1 of 6 conditions: (1) no warning label (control); (2) calorie label; or (3-6) 1 of 4 text versions of a warning label (eg, Safety Warning: Drinking beverages with added sugar(s) contributes to obesity, diabetes, and tooth decay). Parents chose a beverage for their child in a vending machine choice task, rated perceptions of different beverages, and indicated interest in receiving beverage coupons.

**Results:** Regression analyses controlling for frequency of beverage purchases were used to compare the no warning label group, calorie label group, and all warning label groups combined. Significantly fewer parents chose an SSB for their child in the warning label condition (40%) versus the no label (60%) and calorie label conditions (53%). Parents in the warning label condition also chose

> [Obesity \(Silver Spring\).](#) 2018 Nov;26(11):1670-1671. doi: 10.1002/oby.22318.

## Nutrient-Based Warning Labels May Help in the Pursuit of Healthy Diets

Neha Khandpur<sup>1,2</sup>, Boyd Swinburn<sup>3</sup>, Carlos A Monteiro<sup>1</sup>

Affiliations + expand

PMID: 30358147 DOI: [10.1002/oby.22318](https://doi.org/10.1002/oby.22318)

### Abstract

In this commentary we argue that the newest paradigm of front-of-package labels, represented by the characteristics found in the Chilean warning label, has the greatest potential to promote health diets compared with the Keyhole symbol, the multiple traffic light label, the Health Star Ratings system, and the 5-Color Nutrition label. Warning labels: (1) are consistent in the information they communicate; (2) discourage the purchase and consumption of noncore foods that characterize

## HOW SOME PRODUCTS WILL LOOK LIKE WITH FOPL WARNING AND HSR?

# Britannia Nutri Choice Protein



Based on WHO SEARO Cut Off limits for negative nutrients

# Kurkure Masala Munch

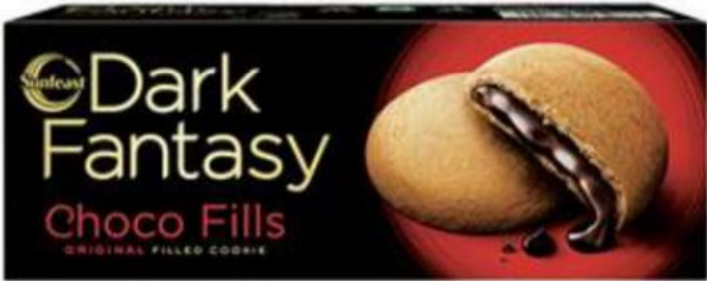


Indian Nutrition Rating

- HIGH IN CALORIE
- HIGH IN TOTAL FAT
- HIGH IN SODIUM

As per WHO SEARO Cut Off limits for negative nutrients

# Dark Fantasy Choco Fills



Indian Nutrition Rating

- HIGH IN CALORIE**
- HIGH IN TOTAL SUGAR**
- HIGH IN TOTAL FAT**

WHO SEARO Cut Off limits for negative nutrients

# Fanta Apple Delite



Based on WHO SEARO Cut Off limits for Food Risk Factors

# MARKETING REGULATION



# Aggressive Marketing of Junk foods/HFSS by celebrities and targeting children



New Maaza Aam Panna TVC with Pooja Hegde and Amitabh Bachchan #DildaarBanaDe



Sky is not the limit. Dew it! #DarrAageTootHai



Maaza Aam Panna TVC with Pooja Hegde and Amitabh Bachchan #DildaarBanaDe

# Marketing Strategies used by junk food/hfss industry

- Tracking your digital footprint
- Pushing out ads on social media just when you might be hungry
- Offering better prices for larger portions
- Using fancy and flashy packaging to make the food look more attractive
- Sponsoring tv shows, school and college events
- Inducements like toys, cash back, phone recharge etc



# Taking action to protect children from the harmful impact of food marketing: a child rights-based approach, Unicef , 2023

- Food marketing is **pervasive** globally. Exploits children **vulnerability, impulsiveness** and ability to be easily influenced.
- More than ever, **children are exposed to marketing across multiple channels**, including online (via digital marketing).
- It uses strategies to project **positive experience and peer influence**.
- The collection of **personal data** from children online is increasingly used to inform **behavioural advertising**.

## Recommends:

- Defining **robust regulatory objectives**
- Implement **marketing restriction**



[Source: 9789240047518-eng.pdf \(who.int\)](#)

## Set of recommendations on the marketing of foods and non-alcoholic beverages to children, WHO 2012

- In 2010, the Sixty-third World Health Assembly unanimously endorsed the WHO Set of recommendations on the marketing of foods and non-alcoholic beverages to children.
- This document calls for **concerted action to reduce the impact on children of the marketing of HFSS foods** due to public health concerns.

### Recommends:

- Settings **where children gather should be free from all forms of marketing** of HFSS foods.
- The **policy framework should specify enforcement mechanisms** and establish systems for their implementation. In this respect, the framework should include **clear definitions of sanctions** and could include a system for reporting complaints.



# Policies to protect children from the harmful impact of food marketing WHO guideline , 2023

## Recommends:

- ‘Children’ refers to all human beings below **the age of 18**, as defined by the Convention on the Rights of the Child.
- The impact of marketing is a function of **both exposure and power**.
- Minimize the risk Migration of marketing
- Nutrient profile models in the context of food marketing help define foods to be restricted from marketing and should align with national dietary guideline

Policies to protect children from the harmful impact of food marketing  
WHO guideline



[Source: 9789240075412-eng.pdf \(who.int\)](https://www.who.int/publications/m/item/9789240075412-eng)

# Report on Digital marketing of unhealthy foods and beverages directed to children and adolescents in LAC, 2023

## Recommends:

- Consider a broad definition of marketing that **encompasses different forms of communication**
- Implement **mandatory measures** to be enacted by governments
- **Expand the channels and media** to be regulated.



# Scientific evidence suggesting legislative action

The key opportunities for strengthening legislative design include :

- **Increasing the age threshold** of a child to **18 years**;
- Regulating **all marketing that children** are exposed to;
- Designing **tailored regulations** for multiple settings, media and techniques;
- Strengthening **food classification** systems
- Comprehensive **stepwise regulatory implementation**;
- Strengthening **monitoring and enforcement** systems.

Review > Curr Obes Rep. 2023 Mar;12(1):1-9. doi: 10.1007/s13679-023-00492-6.

Epub 2023 Feb 13.

## Strengthening Global Legislative Actions to Protect Children from the Harmful Impacts of Unhealthy Food and Non-alcoholic Beverage Marketing

Fiona Sing <sup>1</sup>, Kathryn Backholer <sup>2</sup>

Affiliations + expand

PMID: 36781623 PMID: PMC9985549 DOI: 10.1007/s13679-023-00492-6

[Free PMC article](#)

### Abstract

**Purpose of review:** Drawing on current global food marketing policies and the academic literature, we illustrate why and how existing legislative approaches can be strengthened to better achieve the goal of protecting children from the harmful impacts of unhealthy food and non-alcoholic beverage marketing.

# Best Practice in Marketing Regulations

- **Ireland** under the Commercial Communications Code (2013 revision) **bans advertising, sponsorship, teleshopping, and product placement of foods high in fat, sugars, and salt (as determined by a nutrient profile model) during children's television and radio programming**, as well as any other programming with a 50% or higher audience of viewers under the age of 18, are specifically prohibited by the regulation.
- **Chile** in 2012 approved a Law of Nutritional Composition of Food and Advertising and in 2015, a regulation was made under that law requiring its implementation. The law mandated front-of-pack warning labels, **restricted the marketing of foods to children under the age of 14 years, and banned the promotion and sale of foods and beverages containing added sugars, sodium or saturated fat that exceed set nutrient or calorie thresholds in schools.**
- **Norway** has decided to **outlaw the marketing of food and drink items that are regarded harmful and are intended for children under the age of 18.** In June 2023, the nation's parliament, passed the measure with a majority. At the beginning of **next year, the junk food regulations will go into effect together with a restriction on the sale of energy drinks to those under the age of 16.**
- **Thailand**, in 2020 **banned marketing and promotion activities for all types of foods and beverages in educational institutions.**

Source: Taking action to protect children from the harmful impact of food marketing: a child rights-based approach. Geneva: World Health Organization and the United Nations Children's Fund (UNICEF), 2023.



## Best Practice in Marketing Regulations

- **Canada** in 1978 any **commercial advertising that targets children under the age of 13 prohibited in on radio, television, print, the internet, mobile devices, signage, and promotional products.**
- **United Kingdom** 's Code of Broadcast Advertising Practise **prohibits placing adverts for foods high in saturated fat, trans fat, free sugars or salt next to television shows made especially for or appealing to children.** In 2019, the government made clear that it intended to implement a policy that would forbid advertisements for foods high in salt, free sugars, trans fats, or saturated fat from **appearing on television or online between 5:30 and 21:00 pm.**
- **Peru** in 2019, **advertising that targets children and teenagers under the age of 16 is prohibited under the Law Promoting Healthy Eating for Children and teenagers.** This means that businesses **cannot utilise actual or fictional characters, presents, prizes, or any other form of reward to promote the purchase or consumption** of food or beverages in an age-inappropriate manner.
- **Turkey** in 2019 based on the WHO Europe nutrient profile model, made broadcast regulation **imposes restrictions on the marketing of foods to children.** It is **forbidden to market some food categories during children's programming,** including chocolate and chocolates, energy bars, sweet biscuits and waffles, potato chips, and beverages with added sugar.
- 

Source: Taking action to protect children from the harmful impact of food marketing: a child rights-based approach. Geneva: World Health Organization and the United Nations Children's Fund (UNICEF), 2023.

# TAXATION POLICY

# Report: Consultation on Fiscal Policy for Healthier Diets in India, IEG,2023

- **Mexico's energy excise tax**, which targeted nutrient-specific GST rates, **resulted in a 3 percent reduction in HFSS goods consumption.**
- The **United Kingdom**, the range of reformulation **increased by double after levying taxes on SSB.** For non-alcoholic beverages, the UK government imposed a 90 percent tax.

## Recommends:

**Appropriate taxation is an important aspect in curbing these adversities of HFSS food intake** considering the global lessons.



# India's Sin Tax on Cola Drinks

- The Government of India has recognized that sugary drinks are harmful to health and put them in highest slab 40% GST of sin tax.
- It could be extended to other Junk /HFSS foods
- Increasing taxes on junk food products and making them expensive may discourage consumption.
- In case of extra tax income , the income could be used to subsidise healthier foods, and for implementing policies against NCDs.



SOUTH ASIA BAHUIS  
**'Sin tax' of 40% proposed to cover Indian soft drinks**  
By [Raj Whitehead](#)  
08 Oct 2015. Last updated on 08 Dec 2015 at 07:53 GMT



## Conclusion

- In India there is agreement on the harmful impact of junk foods on human health but there is difference of opinion when it comes to framing the regulatory policies for marketing and warning based FOPL. Its usually based on the economic loss argument.
- Economic gain should not be at the cost of public health.
- Self regulation is usually volunteered and encouraged by the industry and government. Whereas, there is scientific evidence that self regulation by industry does not work therefore strong regulations are needed for reducing junk food consumption.
- Promotion of health seeking consumer behaviour are good interventions but in addition warning labels FOPL and strong marketing regulation are the need of the hour.
- Taxation on all HFSS foods can help curb junk food/HFSS consumption.