

NAP*i*

Press release by the Nutrition Advocacy in Public Interest (NAP*i*)

‘Warning’, a must on unhealthy packaged foods

A loud and clear ‘position’ of prominent Indian public health and consumer bodies to protect from harms of junk foods

- **Twenty-two Indian public health and consumer organisations came together to oppose FSSAI’s plan to label ultra-processed foods with ‘Health Star Rating’, which is designed to mislead and confuse consumers**
- **In view of the growing crisis of obesity and non-communicable diseases (NCDs), such as diabetes, cancers and heart disease, the statement points towards governments’ responsibility to warn consumers about these unsafe food products**
- **The jointly-endorsed position statement released today, vehemently calls for a mandatory ‘warning’ label to inform the consumer about these unhealthy and ultra-processed food products, which are high in salt, sugar or fats and can negatively impact health of children and adults**
- **The statement presents irrefutable evidence to show that warning labels have been most effective to discourage consumption of these ultra-processed food products and Health Star Rating has failed to do so**

May 4, 2022, New Delhi: A position statement on ‘Front-of-Pack Labelling (FOPL) on Unhealthy Food/Drink Products’ was released today by the Nutrition Advocacy in Public Interest (NAP*i*) through a press conference held at Indian Women's Press Corps.

“We at NAP*i*, believe that FSSAI has gone wrong both in its approach and the decision to include ‘Health Star Rating’ on unhealthy food and drink products. We are pleased to share that prominent public health and consumer bodies from across the country have come together against this irresponsible move,” said Dr. Arun Gupta, convener, Nutrition Advocacy in Public Interest (NAP*i*), while presenting the position statement.

Endorsed by 22 Indian organisations protecting public health, the statement strongly opposes recently announced plans of the Food Safety and Standards Authority of India (FSSAI) to adopt ‘Health Star Rating’ (HSR) instead of a ‘Warning Label’, as a front-of-pack label for packaged foods high in salt, sugar or fat.

“Packaged food products, which are high in unhealthy fats, salt or sugar and several of which are ultra-processed, damage health in many ways – from reducing immunity to increasing the risk of heart disease, diabetes, obesity and certain cancers” said, Prof. K Srinath Reddy, President of the Public Health Foundation of India (PHFI), who released the statement to media.

“Star ratings can be misleading, as they do not clearly inform the consumer whether the rating is for specific constituents, taste or shelf life. The consumer’s right to judge the health risks posed by any packaged food product is not served by the star ratings”, added Prof. Reddy.

Developed by the NAPI in consultation with endorsing organisations, this joint statement adds to the growing criticism of FSSAI’s announcement to go ahead with ‘Health Star Rating’, which can mislead the consumer.

“Individual components like fiber, fruit, vegetable or nuts added to a fundamentally unhealthy food product in the name of positive nutrients, may give a false impression of the food being healthy which can lead to over consumption of such food products”, said Dr. Vandana Prasad, community pediatrician, Public Health Resource Network, while adding to the misleading nature of Health Star Rating

Health Star Rating (HSR) Labels can’t be a solution for Indian consumers, says George Cheriyan, “We should learn from the experiences of Australia and New Zealand and be cautioned against adoption of HSR. It is important that Indian regulators choose a simple and interpretive label that aids consumer to reject unhealthy products”

Experts from across the country are in favour of nutrient specific ‘Warning Labels’, which is known to be effective to reducing consumption of junk foods.

“Since there is stronger evidence that Warning Labels are able to impact consumer behaviour towards more healthy diets, it appears that the food industry is being able to influence decision making through the stakeholder consultations where it occupies a majority status”, added Dr. Prasad while commenting on the policy-making process.

Dr Remesh Kumar president of Indian Academy of Paediatrics (IAP) said “IAP endorses Warning labels on packaged foods and NOT health star rating (HSR) system. Food industry might like the stars on unhealthy food products but we believe Warning labels should be used, as this is what scientific evidence tells us. FSSAI May reconsider its decision on HSR”,

“Considering obesity to be a major driver of morbidity and mortality, people should be able to identify foods with high calories and harmful ingredients. Warning labels are a reliable way to identify harmful foods. It is the need of the hour, said Dr. B.G. Dharmanand, President of the Indian Rheumatology Association (IRA) from Bangalore.

Supporting the point on warning labels, Prof (Dr) Vitull K. Gupta, said “Junk foods, ultra-processed foods, nutritionally inappropriate foods and caffeinated, colored, carbonated or sugar-sweetened beverages necessitate creating a healthy food environment supplemented by warning on the front of pack label (FOPL)”. Prof. Gupta is Chairman, Association of Physicians of India (Malwa Branch) and a Health and Human rights activist.

Referring to the importance of providing simple and effective information to consumers said Vasundhara Raghavan of Kidney Warriors Foundation from Mumbai. "It is well established that for consumers to make an informed decision at the point of purchase, the labels should be interpretive and provide judgments about the unhealthy nature of the product to make an informed choice."

The statement points towards substantial scientific evidence showing that increased consumption of ultra-processed unhealthy food/drink products is associated with high risks of NCDs and all-cause mortality. It also presents evidence to show that warning labels are most effective to reduce consumption of unhealthy food products and Health Star Ratings fail to do so.

"Food industry is not interested in such information to the consumers as it may hit the bottom-line and is happy with HSR, which is confusing and can be manipulated. It is imperative therefore, that FOPL should be mandatory and not left to the industry as voluntary", added Professor HPS Sachdev, member of NAPI, while emphasizing the need for a mandatory regulation.

The statement also calls for a timely law for warning labels; adoption of thresholds based on the nutrient profile model of the World Health Organization developed for the South East Asia Region; immediately stopping the marketing of unhealthy foods targeted at children; and absence of conflict of interest while making decisions related to public health. It outlines the concern that about 60 percent of annual deaths in India are due to non-communicable diseases (NCDs) and more than half of 5-19 years old Indian children have elevated biomarkers of NCD.

"India can't afford the epidemic of obesity and non-communicable diseases. Health Star Rating will help the junk food industry legally sell its bad food as good food. FSSAI can't allow this. It must come forward and show that it cares for the health of the Indian consumer. It will have to act strongly to counter the industry pressure and fulfill the mandate given" said, Sunita Narain. Director General, Centre for Science and Environment (CSE).

ENDs

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Notes for the editors:

1. [Position Statement](#) (English)
2. [Position Statement](#) (Hindi)
3. [Press Release](#) (English)
4. [Press Release](#) (Hindi)
5. [List of Contact Persons of endorsing organisations.](#)

Recommendations mentioned in the position statement:

1. 'Warning labels 'in 'symbols' or as 'high in' or 'excess of' nutrients of concern should be mandatory in the draft regulation of labelling and display and not the Health Star rating.
2. Thresholds for salt, sugar and fats should be based on the WHO SEARO' nutrient profile modeling.

3. Positive nutrients like *fruit, vegetable, nuts, and fiber* should not be weighted for labelling as these are used for making health claims for marketing.
4. Marketing of unhealthy foods/drinks targeting children should be immediately stopped through legislation.
5. Decisions on such public health issues should be made without any conflicts of interest even at a consultative level, interaction with the food industry may happen on a separate platform to hear their suggestions and discuss with experts to make decisions with public health interest in the center stage.
6. Once the notification on FOPL is finalized, a maximum of 12 to 18 months may be given to the food industry to comply with.
7. Government should lead a comprehensive public campaign through health systems, on which foods are safe to eat and which are not.

Endorsing Organisations

1. Alliance for Sustainable & Holistic Agriculture (ASHA)- Kisan Swaraj Network
2. Association of Physicians of India (Malwa Branch)
3. Breastfeeding Promotion Network of India (BPNI)
4. Centre for Science and Environment (CSE)
5. Commonwealth Association for Health and Disability (COMHAD)
6. Consumer Voice
7. Cuts International
8. Epidemiology Foundation of India (EFI)
9. Indian Academy of Pediatrics (IAP)
10. Indian Association of Preventive & Social Medicine (IAPSM)
11. Indian Public Health Association (IPHA)
12. Indian Rheumatology Association (IRA)
13. Initiative for Health & Equity in Society (IHES)
14. Kidney Warriors Foundation
15. Non-Communicable Diseases Prevention Academy (NCDPA)
16. Obesity Surgery Society of India (OSSI)
17. Pediatric and Adolescent Nutrition Society (PAN) -IAP Nutrition Chapter
18. People's Vigilance Committee on Human Rights (PVCHR)
19. Public Health Foundation of India (PHFI)
20. Public Health Resource Society (PHRS)
21. The Maharaja Sayajirao University of Baroda
22. Nutrition Advocacy in Public Interest (NAPi)