

## A Report of the Proceedings of a Webinar: Presentation of the new study Front-of-Package Labels on Unhealthy Packaged Foods in India: Evidence from a Randomized Field Experiment” 16th September 2022.

The Nutrition Advocacy in Public Interest (NAPi) <http://www.napiindia.in/>organised a presentation of a newly published peer reviewed study in India on the front of pack labeling. The [study](#) titled “Front-of-Package Labels on Unhealthy Packaged Foods in India: Evidence from a Randomized Field Experiment” was presented by one of the lead author Prof. SK Singh and Barry Popkin <https://www.mdpi.com/2072-6643/14/15/3128> (*Nutrients* **2022**, 14(15), 3128; <https://www.mdpi.com/2072-6643/14/15/3128>)

India is facing a huge problem of increasing obesity both in men and women as well as the burden of non-communicable diseases such as Heart disease, diabetes and cancer. More than 5.8 million Indians die every year from Non-Communicable Diseases (NCDs) such as cancer, diabetes, uncontrolled hypertension and cardiovascular diseases, which is about 2/3<sup>rd</sup> of total deaths. According to the National Family Health Survey-5, nearly 1 in 4 adults and 1 in 20 children are classified as overweight or obese, and it is rapidly increasing. At the same time, India faces a major double burden of malnutrition, as stunting, underweight and wasting remain high, more so among the poor. One of the major factors underlying is rapidly increasing consumption of ultra-processed food/beverage products. It is with this background NAPi had organised the presentation and discussion around the evidence that has been generated from India.

The evidence is mounting on the harms on human health caused by the increased consumption of ultra-processed food products (UPFs), which are mostly high in sugar, salt or saturated fats. It makes a compelling case for a policy to reduce consumption of such products and minimize diet related non-communicable diseases. (NCDs). Several studies and reviews confirm that intake of UPFs leads to over consumption, high versus low consumption of ultra-processed diets has been found to be associated with chronic diseases like overweight, type-2 diabetes, cancers, hypertension, heart disease and ***all cause mortality***. People who consumed 10% increased UPFs in their diet had a 15% greater chance of developing type 2 diabetes.

In addition, a recent review published in The Lancet Gastroenterology & Hepatology describes the mechanistic association between the consumption of UPF and chronic medical conditions, especially those involving the gut microbiome. A Cohort study (UK Biobank) shows association of UPF intake and Covid-19 disease. Studies also reveal the link of consumption of ultra-processed food with dementia, anxiety and depression. Latest

among the evidence is from a new cohort study that shows after controlling for a broad range of potential confounders and the intake of critical nutrients, a higher intake of UPF was associated with a higher risk of CVD and all-cause mortality.

NAPi believed it to be important to share the study findings at this occasion, as the Food Safety and Standards Authority of India (FSSAI), currently working on this policy, [continues to rely](#) on the report of the IIM Ahmedabad, and insists on providing Health Star Rating (HSR) to all unhealthy food products. FSSAI believes that this way it can help generate information about the nutritional value of the product.

The presented study objective was to look at if FOPLs helped Indian consumers identify “high-in” nutrients of concern in the packaged foods and reduce intentions to purchase them. Professor SK Singh presented the key findings, as Dr. Vandana Prasad chaired the session and other public health experts shared their views after the presentation.

### **Findings:**

1. Relative to the control group, each FOPL led to an increase in the percentage of participants **who correctly identified all products** with high levels of nutrient(s) of concern, which are total sugar, salt or saturated fats. The biggest differences observed were for the warning label (60.8%) followed by the traffic light label (54.8%), GDA label (55.0%) and HSR label (45.0%).( Fig.)

2. Relative to the control, warning labels led to a small but statistically significant reduction in participants’ intentions to purchase unhealthy products.

3. Other outcomes: Warning labels performed best on perceived message effectiveness, a scale that reflects both message perceptions (judgments about how well the message will lead to persuasion) and is predictive of behavioral change.

4. Other outcomes: Warning labels also performed best identifying products as unhealthy, making participants concerned about health consequences and being true. The HSR performed worse than all other FOPL types tested.

The authors rightly concluded, *“This randomized field experiment found that, relative to a control label, all FOPLs helped consumers to identify unhealthy packaged products high in sugar, sodium, and saturated fat. The pattern of results suggested that **the warning label is the optimal FOPL to achieve the goal of informing consumers about packaged foods and drinks high in nutrients of concern...**”*

### **Expert Comments**

**1. Dr. Pankaj Bhardwaj, MD, Academic Head, School of Public Health & Additional Professor Community & Family Medicine & Vice Dean (Research) AIIMS Jodhpur.**

“It is high time that our country should have a clearly defined regulatory objective. This will help in identifying the kind of FOPL system that fits the intended purpose. If our regulatory objective of adopting an FOPL system is to help consumers to identify unhealthy products correctly, quickly, and easily, the results of the study may help the policy makers in further discussions on this issue. The summary score systems (High Star Ratings) are not of much use to the consumers in identifying the food items with excessive amounts of specific critical nutrients (e.g., sugars, fats, and sodium)” He complimented Dr. Singh for this robust study with a good representativeness. Rural urban areas are all covered. Dr. Bhardwaj emphasized it is all about the question, can one identify unhealthy food.

**2. Prof. K Srinath Reddy, President of Public Health Foundation of India (PHFI)**

He made a point that health star rating gives a confusing message, on the other hand warning labels give a clear message. Repetitive messages are needed on harmful consequences of high sugar/salt food products. Government of India should not be seen as endorsing harmful food products. People have a right to know about harmful levels of salt, sugar and unhealthy fats in the foods that they purchase, to help them decide how to protect personal and family health based on that information. Health Warnings serve that purpose best. Health Star Ratings claim to provide an overall assessment of the nutrient content but can mask harmful levels of specific nutrients when multiple additives are summed up. Evidence from the IIPS study clearly supports the use of Warning Labels for effective risk communication.

Dr. **Ashwani Mahajan**, Convener, Swadeshi Jagran Manch (SJM) referred to his conversation with Hon’ble Health Minister. He made a point that this credible evidence from a MOHFW- Government of India’s premier institute, must be taken into account. Unhealthy packaged food should have a ‘Warning label’ not a health star rating. The reason being such foods are dismissive of our traditional food culture. He also raised the issue of conflicts of interest among the stakeholders that took the decision to include HSR in the draft regulation, had the overwhelming presence of the food industry, which is a huge conflict of interest and should be avoided when it comes to food policy.

Dr. Arun Gupta briefed about efforts of NAPI in reaching out to the Ministry of Health, PMO and President of India to intervene and move towards a fair policy that protects the health of consumers and not of the food industry.

Several public health experts have [critiqued](#) the IIM report for its methods and flawed interpretation. At the same time FSSAI had [briefed](#) IIM on September 09, 2021 saying that FSSAI plans to introduce a FOPL system that would be effective in “..informing

*consumers about healthy food choices in terms of saturated fat, total sugar, salt/sodium, energy content, and probably other positive nutrients.* "Dr. Arun Gupta Convener of NAPI said, "If a researcher has to deal with 'positive nutrients' for FOPL, either HSR or Nutri-Score will come up. The IIM report recommending HSR, suggests a bias"

**3. Dr. Lalan Bharti Indian Academy of Pediatrics.** IAP, a body of 38000 child health doctors, recommends to the Ministry of Health Government of India to take up warning labels as a matter of urgency. Children face pandemic of NCDs IAP has issued guidance on the Junk and Ultra-processed food consumption. He strongly recommended warning labels as mandatory and called for restriction of marketing as children are lured by advertisements.

**4. Dr. Pfoze Member of Parliament (Lok Sabha) could not join the meeting but shared his statement.** "It is quite important for the food safety authority to take a decision that protects public health as its mandate is to ensure safe food. The unhealthy food products can only be curbed in consumption if the consumer is warned about it. The scientific evidence presented today is convincing that warning labels have the biggest impact"

NAPi believes there is enough scientific [evidence](#) that warning labels work better than HSR. If a food product receives ½ to 5 'Stars' it is misleading and may in fact increase consumption of unhealthy food products. Evidence suggests [HSR can be manipulated](#) as well to get a higher number of stars. It is critical that the Government of India looks at the rights of consumers to their health. The Consumer Protection Act 2019 upholds the right to safe food. The Hon'ble Supreme Court has upheld that any food article, which is hazardous or injurious to public health, is a potential danger to the fundamental right to life.

Dr. Vandana Prasad highlighted in her remarks the quality of the study is so good that it cannot be ignored and called for healthy and diverse diets to be available for all children in India.

The meeting ended with a vote of thanks from NAPI. Discussions among the group included continued dialogue with the Ministry of Health, as Dr. Ashwani Mahajan is seeking a meeting with the Health Minister. Updating all partners on the emerging evidence among other actions will also continue.

Ends.

Link to Recording - <https://youtu.be/xllunnpzEdo>

Link to PPT - <https://www.napiindia.in/docs/Webinar-Sept16-PPT.pdf>