NUTRITION ADVOCACY IN PUBLIC INTEREST-India

(NAPi)

December 28, 2022

CONVENER

Dr. Arun Gupta Child Health & Nutrition Advocate 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 Worker

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

napiindia.in@gmail.com www.napiindia.in To, Sh. Amitabh Bachchan, Jalsa, B/2, Kapol Housing Society, V.L. Mehta Road, Juhu, Mumbai 400049

Dear Sh Amitabh Bachchan,

Greetings from Nutrition Advocacy in Public Interest (NAPi)

We are a group of independent experts in epidemiology, human nutrition, community nutrition and paediatrics, medical education, administration, and management; having decades of experience in respective fields; has come together to advocate on nutrition policy in public interest.

We learned about your association with Britannia Milk Bikis Biscuits through a recent KBC Junior commercial that was broadcast on television, YouTube, and other social media platforms. (YouTube Video Link: https://www.youtube.com/watch?v=3podDhZjcJQ)

We are shocked and surprised to learn that you have chosen to endorse 'Britannia Milk Bikis' Biscuits on a children's TV programme. We would like to draw attention to the fact that the advertisement for the biscuit brand misleads consumers by equating an unhealthy, ultra-processed and pre-packaged food product which is an industrial formulation; with real foods like "Atta Roti" and "A glass of Milk."

You and your team may be aware of the regulations of the nation that Food Safety Standards Act (FSS) Act 2006 prohibits misleading advertisement of food products. And Consumers Protection Act 2019 section 2 (28) says "misleading advertisement" in relation to any product or service, means an advertisement which – (i) falsely describes such product or service; or (ii) gives false guarantee to or is likely to mislead the consumers as to the nature, substance, quantity or quality of such product or service; and (iv) deliberately conceals important information.

We would like to provide the following information:

The threshold for this category of food is 6 g/100 g for sugar, 8 g/100 g for fat, and 250 mg/100 g for sodium, according to the WHO SEARO Nutrition Profiling Model. The WHO advises to prohibit marketing if the food product crosses this limit. (Linkhttps://apps.who.int/iris/handle/10665/253459)

Britannia Milk Bikis Biscuit, on the other hand, exceeds all three criteria and is a high-sugar, high-fat, and high-sodium product. It contains 23.4 g of sugar per 100 g, 17.8 g of fat, and 287 mg of sodium per 100 g.

This is harmful for children as increased consumption may contribute to childhood obesity and type -2 diabetes and other non-communicable diseases in later life. There is much evidence available in the public domain that these products are addictive in nature.

It is essentially a high-sugar product, or what is now referred to as empty calories, and is neither healthy food nor nutritious. We think this commercial is deceptive and discredits home-cooked, authentic foods like "Atta Rotis." It also claims to have the same amount of energy as animal milk despite containing ingredients like "sweetened condensed partially

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Skimmed milk solids". It also contains additives like emulsifiers, raising agents and artificial milk flavouring substances.

Big food corporations are well known for using convenience-driven marketing strategies that undermine parents' confidence to give their children the best nutrition possible. Your advisors may have missed this angle.

We fear that this advertisement will influence families and children, may displace real family foods, and may lead to addiction to high sugar unhealthy pre-packaged food products eventually putting children' health at the risk.

Thus, your association with Britannia Milk Bikis is not in the spirit of promoting optimal nutrition for children and adolescents.

In the year 2014 you renounced association with Pepsi due to the health implication it has on children and in the year 2018 you renounced your association with Horlicks on the same ground.

We believe that such an association will also harm your reputation as a socially conscious

Finally, we urge you to end your association with Britannia Milk Bikis and request you to avoid from endorsing high sugar, sodium, and fat products in the future in the public interest.

Thank you!

Yours Sincerely,

Members of the Nutrition Advocacy in Public Interest (NAP)

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