

Event Report
State Level Consultation
on
Status of the NCDs and Role of Front of Package Labelling
Jaipur, Rajasthan August 30, 2022



Background

Inserting simplified nutrition information into food packages is a cost-effective strategy. This will guide consumers to make healthier choices and discourage them from consuming foods high in salt, sugar, and fat (HFSS) - the critical nutrients causing a rise in Non-Communicable Diseases (NCDs). In short, it is a tool that aids consumers in improving their diets and helps them make informed decisions.

In 2012, Chile became the first country to bring in a regulation to check the nutritional content of food and its marketing across the country. It mandated a front-of-package label (FoPL) for most food products high in a certain level of calories, sugars, sodium, and saturated fat. Today, there exists a variety of FoPL with different approaches and designs interpreting nutrition globally. In India, FoPL regulation for ultra-processed packaged foods has long been pending due to the go-slow attitude of the regulator and stiff opposition from the food industries for various reasons.

FoPL was first recommended in 2014 by an expert committee constituted by the Food Safety and Standards Authority of India (FSSAI) 2013. After years of consultations, FSSAI published a draft of the Food Safety and Standards (Labelling and Display) Regulations in May 2018. In 2019, due to stringent thresholds in the earlier draft and industry pressure, FSSAI issued another draft Food Safety Standards (Labelling and Display), Regulations, 2019. But in December 2019,

FSSAI delinked FoPL from general labelling regulations again due to the food industry's reluctance.

Stakeholder consultations were held to boost the diminishing confidence of stakeholders, reach a common consensus on the labelling design, make applicable thresholds, and display nutrients. The recent consultation was held in February 2022. It was announced that FSSAI plans to voluntarily go ahead with the 'Health Star Rating' (HSR) based on survey findings by IIM-Ahmedabad. It was realised that the objective of the stakeholder consultations, which were heavily dominated by the packaged food industry, was to develop a labelling system which is ultimately more industry-friendly rather than addressing the needs of the consumers in India. The regulator preferred relying upon a limited study conducted by a business school by ignoring the global best practices and evidence.

Therefore, the main objective of this consultation was to discuss the status of NCDs in India and the role FoPL could play in curbing NCDs and generating a demand for the most suitable and effective warning labels on packaged food in India among wider stakeholders.

During the consultation, public health and consumer experts in Rajasthan unanimously demanded mandatory simplified FoPL regulation to be notified by the Food Regulator at the earliest to address the rising NCDs in the country.

The consultation was attended by more than 50 participants, including representatives of various government departments, organisations working on NCDs, health and consumer protection from different parts of Rajasthan.

Proceedings

Opening Address: George Cheriyan, Director, CUTS International and a member of the Central Advisory Committee (CAC) of FSSAI, in his opening address, said that the FoPL is a cost-effective messaging strategy to helping consumers to make informed and healthier food choices by assisting the consumers to correctly, quickly, and easily identify products that contain unhealthy ingredients such as sugar, salt and fats. One of the major reasons for increasing NCDs is poor dietary behaviour. Therefore, he stressed that the food regulator in India needs to move forward at a more rapid phase for choosing an ideal label for packaged food products for consumers in India.

Almost 42 countries have started to reap the benefits from positive consumer behaviour since implementing the FoPL in their respective countries. It has helped those governments to save money from direct and indirect healthcare costs. In addition, Cheriyan said that before the food regulator moves ahead with a decision to implement FoPL, health being a state subject, states should be taken into confidence and elaborate discussions should take place. To address the increasing NCD burden, governments are implementing multi-faceted policy interventions. One such policy is adopting front-of-packaged nutrition labelling on pre-packaged foods and beverages to modify poor dietary behaviour.

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Safety Standards (Labelling and Display), Regulations, 2019. In December 2019, FSSAI delinked FoPL from general labelling regulations.

During the pandemic outbreak, a stakeholder group was formed and regular meetings were held from January 2021 to fast-track the process. FSSAI has now decided that an initial four-year period, as the scientific panel recommended, may be proposed for voluntary implementation of FoPL from mid-2023 to mid-2027.

FSSAI aim to start awarding health stars in the coming year, grading processed foods based on salt, sugar, and fat content, as well as other ingredients, to give an overall assessment of the product. Companies will then be asked to display the HSR on packaging voluntarily, though the policy will likely state that ratings will become mandatory from 2027. But India's health and nutrition experts and consumer advocacy groups, including CUTS, are collectively opposing this move. India needs compulsory warning labels on ultra-processed, packaged food to fight a growing epidemic of lifestyle diseases. A system such as HSR will only create a "health halo" around unhealthy products and confuse and mislead consumers.

To help consumers make healthier choices, Australia and New Zealand introduced the voluntary HSR system in 2014. But studies show that the system is highly flawed, as unhealthy products can still get a high score. This is because the rating is based on the overall nutritional value, and the inclusion of healthy ingredients (i.e. fibre, protein and vitamins) cancels out the unhealthy ingredients (i.e. sugar, saturated fats and salt). More importantly, the system does not effectively assist the vulnerable consumers who need it the most.

Address by the keynote Speaker: Sunil Sharma, IAS, Food Safety Commissioner, Directorate of Food Safety and Drug Control, Government of Rajasthan, in his inaugural cum keynote address, stated that the government officials and many health department employees are still unaware of this critical issue of NCDs and Front of Pack Label. He emphasised the need to spread awareness among all consumers and healthcare providers. He highlighted that consumers have a right to get accurate information about the products they are consuming and it should not be hampered. He agreed to the idea of a warning label for a country like India. He mentioned that if all packed liquors can have warning labels, all food packs shall also have warning labels.

While referring to people's junk food habits, he said that people start eating junk food in the early morning as breakfast, which needs to be altered. He further added that the unpacked traditional food items also have a high quantity of fats, sugar and salts. Some sweets contain too much sugar, which harms consumers.

Lastly, he assures CUTS that since he is aware of the FoPL issue now, he will support the move for strong FoPL regulation at the FSSAI and state levels.

Dr. Ashok Gupta, Professor and Head, J.K. Lone Hospital, Jaipur, supported CUTS' move of advocating solid health warning labels that are easy to understand and show the harmful food content only at the front of the pack. He further emphasised that the proposed health star rating system is not beneficial to the common citizens since it is confusing. He highlighted his research findings and said that Rajasthan is falling in the red zone regarding the prevalence of NCD cases.

Dr. Gupta claimed proper eating habits could reduce a large number of deaths. He spoke about a general misconception among common people that if they exercise or walk daily, even if they eat lots of HFSS food, it will be digested, and their health will be okay. For such people, he advised that physical exercise can help only a little and is not the answer to the health consequences of eating HFSS food.

Sanjay Pandey, National Consultant, Global Health Advocacy Incubator, underlined the importance of the warning label in India. He highlighted that the nonlinear nature of NCDs necessitates a multidimensional approach to addressing the issue. According to him, consumers are misinformed and confused by the health star rating. He also added that other nations that have adopted the front-of-package warning label design had made tremendous progress in eradicating NCDs. He emphasised that by considering India's demographics and environment, it is perfectly feasible for India to pick up some positive traits from other countries.

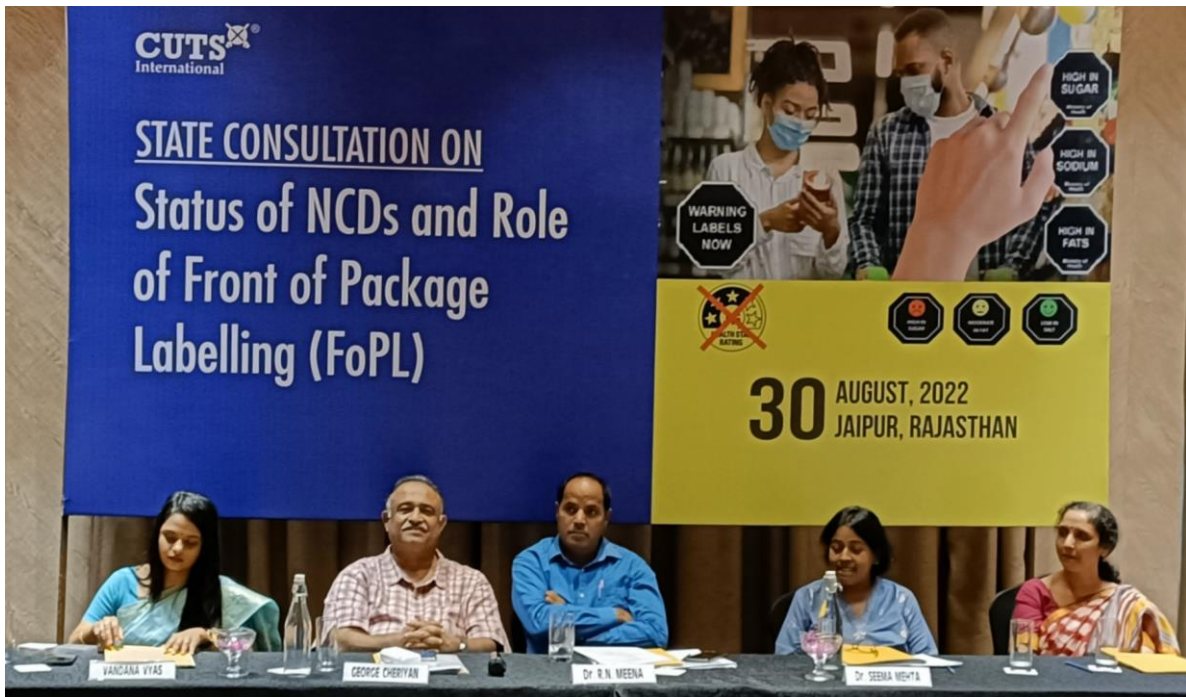
Technical Session

Cheriyen chaired the technical session and Satyapal Singh (Programme Officer, CUTS International) presented the 'Status of NCDs in India and Rajasthan and the role of FoPL'. FoPL schemes have been introduced by governments in over 40 countries worldwide and are being considered by many countries. In India, FoPL regulation for ultra-processed packaged foods has been long pending due to the go-slow attitude of the regulator and stiff opposition from the food industries for their vested reasons.

Regardless of the FoPL System chosen, efforts must be put forth for stakeholder mobilisation and awareness generation programs to encourage the understanding and use of a FoPL. While public awareness of food hygiene has significantly enhanced during the Covid pandemic, knowledge about nutritious and safe food has not been witnessed due to positive changes.

In the technical session that Cheriyen chaired, the key panellists were Dr Seema Mehta, Indian Institute of Health Management Research (IIHMR) Public Health Department; Dr. R.N.Meena, State Nodal Officer, NCDs, Department of Health, Government of Rajasthan; Vandana Vyas, Member In charge, health & Nutrition Cell, Rajasthan State Commission for Protection of Child Right (RSCPCR); and Kanika Verma, Professor, Department of Nutrition, Rajasthan University.

Presentation by Satyapal Singh, Programme Officer, CUTS International, provided a presentation on the status of the NCDs and the role of FoPL in Rajasthan and across the country. It covers the status and impact of NCDs in India, as people with pre-existing NCDs and comorbidities are more vulnerable towards COVID-19 and at high risk. He spoke about the changing diets and shifted toward calorific & fatty foods, eating out and an increase in food portion sizes, combined with a lower intake of fruit, vegetables & high-fibre foods. Later on, his presentation was focused on what is FoPL/Why we need it? and the importance of stakeholders in taking it forward.



Panel Discussion

Dr. Seema Mehta shared the key findings and highlights of a study sponsored by CUTS on FoPL in India and the global status of the same. He mentioned that in most developed countries, the international brands of multinational food manufacturing companies comply with the national regulations of the FoPL system. Still, the same companies do not follow in India without a solid and mandatory FoPL system. She also strongly advocated for a mandatory, robust, consumer-friendly FoPL system in India. She further emphasised the importance of stakeholders and discussed the comparative evaluation of the current FoPL models.

According to the findings of the FoPL study, the Chile model is very effective. She stressed the need to undertake local research. We should focus on Social and Behavioural change communication theory (SBCC). It can aid in the prevention and treatment of NCDs. Because the overall goal of FoPL should be viewed as the cure and prevention of NCDs, and it can mean the difference between life and death. The media may also be viewed as enabling in amplifying and spreading the necessity for FoPL to save lives. To move the campaign ahead, all important stakeholders must be on board, and active engagement of key stakeholders through multiple mechanisms is required.

Dr. R.N. Meena highlighted the problematic state of NCDs in Rajasthan, such as child obesity, anaemia in women, and the prevalence of diabetes and cancer, as well as the relevance of traditional diet. He stated that it is a sensitive topic in today's arena, as the NCDs graph has climbed significantly since 2016, and he emphasised traditional eating patterns and cultural consumption behaviours. Only a few individuals were aware of NCDs in the 19th century, and there were very few people suffering from NCDs. This was because dietary habits were quite excellent, and style of life was complementary to each other.

In India, NCDs currently account for more than 60 percent of fatalities, and NCDs were the most common indirect killers during the pandemic. As adequate nutrition intake is decreasing in

today's eating pattern, which lacks essential ingredients. He believes that consuming traditional food, also known for being a healthy food, can significantly reduce NCDs. He also advised eating the food in the form provided by nature rather than the ultra processed food full of food preservatives and other chemicals.

Vandana Vyas spoke on the right to development in the context of children, with health and nutrition being crucial components. During the 21st century, eating habits have shifted dramatically, which is the primary source of worry. Mothers are unconcerned about the nutrition facts of packaged food. She addressed the manipulation of industry strategy and how they play with consumers.

Following the pandemic, everyone adjusted their dietary habits and began eating traditional foods. She believes we must be vocal about regional food and pay attention to conventional eating practices. She cited her example and said that she developed diabetes at an early age due to not following the healthy dietary pattern and lifestyle and how she is facing its consequences. She further underlined the importance of good, traditional, unprocessed food free from unhealthy ingredients like cholesterol-rich food, bad fats, high sugar, and too many spices and chemically treated fruits and vegetables.

In the end, she mentioned that she will always work on the issue of food safety and the health of children being a member of the state child protection commission and assured her all support for bringing a robust FoPL system in India as soon as possible.

Kanika Verma spoke about how Indian junk food is consumed daily and how we should not hold children responsible for changing their eating habits. Kids should be taught about eating healthy foods, and it is the elderly's responsibility to explain to them the logical reasons why they should not. She further stated that packaged food might be found in every corner of rural places, and we should talk about the detrimental consequences of fast food on health. She also emphasised the negative impacts of ultra-processed meals and presented a market sample of locally manufactured packaged snacks.

Summing up and Vote of Thanks: In the closing session, Madhu Sudan Sharma, Senior Programme Officer, CUTS International, summarised the deliberation and said that most of the participants and officials are aware of the health harms of high-fat sugar and salt in the food, but they are not aware of the importance of FoPL. He underlined the importance of consumer awareness about the food ingredients to protect their health.

About the FoPL, he mentioned that, as told by most panellists, strong warning labels about HFSS food can play a crucial role in ensuring the right to choose the healthy food products from the shelf so that consumers' health is safe. He also mentioned the role of the food manufacturing industry. He said that MNCs or local manufacturers should also think about the health harms of consumers and shall not pressurise the FSSAI to bring a star rating system on all the packaged foods in the country.

He thanked all the panellists in the inaugural and technical session, participants, and media representatives for their active participation and experience sharing.

State Level Consultation

“Status of NCDs and Role of Front of Package Labelling (FoPL)”

Venue: Hotel Sarovar Premiere, Jaipur, Rajasthan

Tuesday, August 30, 2022

Programme Schedule (Tentative)

9:30-10:30 hrs	Registration & Welcome Tea
Inaugural Session 10:30-11:30 hrs	<p>Welcome :</p> <ul style="list-style-type: none"> • Madhu Sudhan Sharma, Senior Programme Officer, CUTS <p>Opening Address:</p> <ul style="list-style-type: none"> • Shri. George Cheriyan, Director, CUTS International <p>Inaugural Speech: Key Note Speaker</p> <ul style="list-style-type: none"> • Shri Sunil Sharma, Food Safety Commissioner, Directorate of Food Safety, Rajasthan <p>Special Address:</p> <ul style="list-style-type: none"> • Dr. K.L. Meena, Director (Public Health), Department of Health, Govt. of Rajasthan <p>Special Address:</p> <ul style="list-style-type: none"> • Dr. Ashok Gupta, Professor and Head, J.K. Lone Hospital, Jaipur, Rajasthan • Shri. Sanjay Pandey, National Consultant, Global Health Advocacy Incubator (GHAI)
11.30 to 11.45 am	Tea Break
Technical Session 11:45 – 13:45 hrs	<p>Status of NCDs and Role of Front of Package Labelling (FoPL)</p> <p><i>Presentation:</i> Satyapal Singh, CUTS International</p> <p>Moderator:</p> <ul style="list-style-type: none"> • Shri. George Cheriyan, Director, CUTS International <p>Panellists:</p> <ul style="list-style-type: none"> • Dr. Seema Mehta, Indian Institute of Health Management Research (IIHMR) Doctor, Public Health Dept. • Mr. Arun Vashishtha, State Program Officer, NCD, Department of Health, Govt. of Rajasthan • Mrs. Vandana Vyas, Member Incharge, Health & Nutrition Cell, Rajasthan State Commission for Protection of Child Right (RSCPCR) <p>Valedictory Address:</p> <ul style="list-style-type: none"> • Dr. Ajeet Singh, Medical Superintendent, RUHS, Jaipur, Rajasthan
Closing Session 13:45 -14:00 hrs	<p>Open Discussion: Participants</p> <p>Summing up & Vote of Thanks</p> <ul style="list-style-type: none"> • Madhu Sudan Sharma, CUTS International
14:00 hrs onwards	Lunch & Departure

**State Level Consultation on
'Status of NCDs & Role of Front of Package Labeling (FoPL)'
Jaipur, August 30, 2022**

List of Participants

S.No.	Name	Name and Address of the Organisation
1.	Mohan Lal Yogi	Gram Chetna Kendra, Kheri Milk
2.	Prof. Kanika Verma	RUWA, University of Rajasthan, Jaipur
3.	Dr. Arati Hota	BMCHRC, Jaipur
4.	Akhilesh Maheshwari	Naya Savera NGO
5.	Sri Lal C.	30/19/07, Swarn Path, Mansarovar, Jaipur
6.	Sunil Gupta	Anvarat Sansthan, 111, Himmat Nagar, Jaipur
7.	Nand Kishore Dubey	LAALO NGO
8.	Shalu	Shorya Seva Sansthan
9.	Om	Shorya Seva Sansthan
10.	Abhishek Pareek	Jaipur Youth Organisation
11.	Neetu K.	Pehchan
12.	Dr. Ashok Gupta	S.M.S. Medical College, Jaipur
13.	Dr. Lokesh Agarwal	S.M.S. Medical College, Jaipur
14.	Sunil Sharma	
15.	Kuldeep Sharma	Sardarshahar, Churu
16.	R. Choudhary	Vil.- Maheshwas, Post- Bichun, Jaipur
17.	Vinod Kumar Sharma	ATMA NGO, Jagmalpura
18.	Nikita Sharma	Malini Foundation
19.	Rohit Pareek	NCNI
20.	Swai Singh Bhati	Shri Bhawani Niketan Public School, Jaipur
21.	Pramod Sharma	Dainik Navjyoti
22.	Alumuddin	DD News
23.	Javed Khan	Dainik Navjyoti
24.	Madhu	CFAR, Civil Lines, Jaipur
25.	Kiran Sinha	Centre for Advocacy and Research, Civil Lines Jaipur
26.	Vandana Vyas	RSCPCR
27.	Bhoopram Sharma	Hardev Shiksha evem Jan Kalyan Sanstha, Jaipur
28.	Harish Chand Sharma	Hardev Shiksha evem Jan Kalyan Sanstha, Jaipur
29.	Lalit Bhardwaj	Sarojini Naidu Sanstha
30.	Sharad Saxena	NBT DM
31.	Dr. Bal Meena	Salo
32.	Arun Yadav	SPO NCD
33.	C.P. Sharma	SPA, NCD
34.	G. Mishra	Orion Greens, Jaipur
35.	Rajesh Malakar	Vikasonmukh Sansthan
36.	Sharda Saini	Vikasonmukh Sansthan

S.No.	Name	Name and Address of the Organisation
37.	Rekha	Vikasonmukh Sansthan
38.	R.K. Sharma	Navjeevan Society
39.	Meenakshi Sharma	CECOEDECON
40.	Dr. Ankita Sharma	University of Rajasthan, Jaipur
41.	Manveer Singh	Amritatva Food
42.	Preeti Rathore	Amritatva
43.	Dr. Veena Dwivedi	JNU, Jaipur
44.	Raj Sharma	Saakaar Sanstha, Jaipur
45.	Dr. S.K. Bansal	Jaipur
46.	Dr. Seema Mehta	IIHMR University
47.	Sanjay Pandey	GHAI
48.	Pratibha Jain	CUTS
49.	Dharmendra Chaturvedi	CUTS
50.	Neeta Upadhyay	Orion Greens
51.	Satyapal Singh	CUTS
52.	George Cheriyan	CUTS
53.	Madhu Sudan Sharma	CUTS