

State Level Consultation on
“Significance of FoPL in Addressing NCDs”



Organised Jointly by

CUTS International & National Resource Centre for NCDs

In Technical Collaboration with

Directorate of Health Services, Government of Kerala

Introduction

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, a variety of FoPL with different approaches and designs interpreting nutrition globally exists. 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 stakeholder's diminishing confidence, reach a common consensus on the labelling design, make applicable thresholds, and display nutrients Webinar Report on FoPL 2 during January-June 2021. However, these consultations were mainly represented by industry associations, influential businesses, and consumer representatives. 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 that 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 State Level Consultation on 'Significance of FoPL in Addressing NCDs' organised jointly by CUTS and the National Resource Centre for NCDs in Technical Collaboration with the Directorate of Health Services, Government of Kerala, was held at Thiruvananthapuram on August 26, 2022, to generate awareness on FoPL and the role it could play in curbing NCDs among wider stakeholders

Inaugural Session

V Meenakshi (Additional Director of Health Services, Public Health) inaugurated the workshop. In her inaugural address, she emphasised the collective effort from all stakeholders in putting FoPL (Front of Package Labelling) into practice in our country.

George Cheriyan, Director, CUTS International and Central Advisory Member of FSSAI, said that the purpose of FoPL is to help consumers make informed purchasing decisions by correctly, quickly and easily identifying unhealthy ingredients. FoPL is a cost-effective strategy to enable consumers to make informed decisions. Therefore, he stressed that the regulators in India need to move forward cautiously but at a more rapid phase while choosing an ideal label for packaged food products for consumers in India.

He stated according to the National Family Health Survey (2019-2020), 47.7 percent of men and 56.7 percent of women have a high-risk waist-to-hip ratio. Increased packaged and junk food consumption has led to a double burden of undernutrition and overnutrition among children. Over half of the children and adolescents, whether under-nourished or with average weight, are at risk of cardiovascular diseases, according to an analysis by the Comprehensive National Nutrition Survey in India (2016-2018).

He said with respect to Kerala, the National Family Health Survey for the year 2019-20 has shown that the number of obese persons is rising in both male and female categories. For women, the obesity rate in Kerala is 38.1 percent in the age group of 15-49 years. Of this 40.4 percent are from urban areas and 36 percent from rural backgrounds. The number of men in Kerala recorded with obesity in the same age group is 36.4 percent, while the national average is only 24 percent. Of this 40.1 percent of men are from the city and 33.2 percent from rural areas.

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 aims 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, oppose this move. India needs mandatory 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.

L John, Regional Director, FSSAI, Ministry of Health & Family Welfare, Government of India, stated that though FSSAI has already decided to go ahead with a Voluntary Health Star Labelling from mid-2023, any discussion in the interest of public health is always welcome. With growing health concerns, it has become vital to influence consumer behavior, this is where the FoPL comes to aid. He stressed that for FoPL to become mandatory, there needs to be a public surge in demand for FoPL, which is currently missing.

Saju V Itty, Executive Director, Kerala, Voluntary Health Services, pointed out that FoPL is a consumer right and the regulators should realize it and thereby take necessary steps to notify an effective labelling system that is most suited to Indian consumers.

Johnson J Edayaranmula, Executive Director, National Resource Centre for NCDS) introduced the panelists and dignitaries and briefed them about the importance of the Consultative Workshop.

Technical Session



Cheriyann chaired the technical session and **Simi TB**, Policy Analyst, CUTS International, presented the ‘Status of NCDs in India and Kerala 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 made 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.

This was followed by an Expert Panelists’ Discussion led by **Bipin K Gopal**, State Nodal Officer, NCD, Directorate of Health Services, **Dr. A. S. Pradeep Kumar**, Former Additional Director of Health Services, **Dr. K. R. Antony**, Pediatrician and Independent Monitor, National Health Mission and **Dr. V. R. Vasundhara**, Medical Officer, Government Nature Cure Hospital, Varkala), who shared their Department’s specific progress and programs related to the NCDs and their effort to tackle this growing menace.

Valedictory Session

Sreejith N. Kumar, Public Health Activist & Leader, Indian Medical Association, was the Chief Guest at the Valedictory Session. Sreejith appreciated the joint effort of Cuts International and the National Resource Centre for NCDs in organising the State Level Consultation and offered all support from the IMA for future endeavours.

The participants unanimously expressed their views which can sum up as follows – “Insertion of simplified nutrition information on the front of food packages is a cost-effective strategy to guide consumers to make healthier choices and discourage them from consuming foods that are high in salt, sugar and fat - the critical nutrients causing a rise in NCDs and thereby making a positive intervention in the Prevention and Control of NCDs.

Geomcy George, Associate Director, NRC-NCD & Medical Superintendent, BCMCH, Thiruvalla presented the Recommendations and Plan of Action adopted at the workshop and proposed the vote of thanks. More than 54 delegates representing government departments, consumer organisations and other stakeholders participated.

Key Recommendations

More than 54 delegates representing government departments, consumer organizations and other stakeholders participated in the half-day consultation. Some of the key recommendations that stakeholders agreed with include:

- Need to sensitise more key stakeholders and enlighten consumers about FoPL.
- A warning label is the best tool to guide those consumers who are medically advised to reduce the intake of fat, sugar, or salt in their diet, encouraging them toward a healthy eating habits.
- Only a warning label can help cut across the barrier of multiple languages and can be easily understood by even those who cannot read.
- Policymakers must be encouraged to take a balanced approach that can adequately protect the public from harmful products.
- There is a need to set minimum standards for locally prepared foods while focusing on packaged foods. Both food categories need to be made safe for good public health.
- Adopting a more popular warning label would significantly boost the export of packaged food products, especially those produced by MSME units.

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The Residency Tower, Thiruvananthapuram Friday, August 26, 2022 (9.30 am – 2.00 pm)

PROGRAMME SCHEDULE

09:30-10:00 hrs	Registration
Inaugural Session 10:00-11:15 hrs	<p>Welcome Address:</p> <ul style="list-style-type: none"> • Mr. Johnson J. Edayaranmula (Executive Director, National Resource Centre for NCDs) <p>Opening Remarks:</p> <ul style="list-style-type: none"> • Mr. George Cheriyan (Director, CUTS International & Central Advisory Member, FSSAI) <p>Inaugural Address:</p> <ul style="list-style-type: none"> • Smt. VEENA GEORGE (Hon’ble Minister for Health & Family Welfare, Govt. of Kerala) <p>Keynote Address:</p> <ul style="list-style-type: none"> • Lt. Col. Mr. L. John (Regional Director, FSSAI, Ministry of Health & FW, Govt. of India) <p>Special Addresses:</p> <ul style="list-style-type: none"> • Dr. V. Meenakshi (Additional Director of Health Services – PH, Kerala) • Mr. Saju V. Itty (Executive Director, Kerala Voluntary Health Services, Kottayam)
11.15 to 11.30 am	Health Break
Technical Session 11:30 – 13:00 hrs	<p>Status of NCDs and Role of Front of Package Labelling (FoPL)</p> <p>Presentation: Smt. Simi T. B (Policy Analyst, CUTS International)</p> <p>Chair: Shri. George Cheriyan (Director, CUTS International & CAC Member, FSSAI)</p> <p><u>Panellists:</u></p> <ul style="list-style-type: none"> • Dr. Bipin K. Gopal (State Nodal Officer, NCD, Directorate of Health Services) • Dr. A. S. Pradeep Kumar (Former Addl. Director of Health Services – PH) • Dr. K. R. Antony (Independent Monitor, National Health Mission) • Dr. V. R. Vasundhara (Medical Officer, Govt. Nature Cure Hospital, Varkala) <p>Questions & Answers:</p>
Closing Session 13:00 -13:30 hrs	<p>Open Discussion: Participants</p> <p>Chair: Dr. Sreejith N. Kumar (Public Health Activist & Leader, Indian Medical Association)</p> <p>Summing up & Vote of Thanks: Dr. Geomcy George (Associate Director, NRC-NCD)</p>
13:30 hrs onwards	Lunch & Departure

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