

Why Health Star Rating (HSR) is not suitable for India?

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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 it helps them make an 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 the nutrition present across the globe. 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 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

during January-June 2021. However, these consultations were represented mainly by the industry associations and influential businesses, and a couple of consumer representatives' voice was always shunned. 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 carried out by a business school by ignoring the global best practices and evidence.

Therefore, the main objective of the webinar was to discuss challenges, share experiences and lessons learnt, and propose alternative solutions and an effective label that would be more suitable for India and the common consumer.

The virtual webinar was attended by around 55 delegates from across the country and abroad, including health experts, national and international organisations, industry representatives, various states' Food Safety Commissionerate, Indian Medical Association, academic and research institutions, and more than 14 states. The video recording of the webinar is available on [CUTS YouTube's](#) channel.

Panelists

1. Lindsey Taillie Smith, Assistant Professor, Department of Nutrition, University of North Carolina, Chapel Hill, United States of America
2. Saroja Sundaram, Executive Director, Citizen consumer and civic Action Group (CAG), Chennai
3. Ashim Sanyal, COO, Consumer Voice, New Delhi
4. Amit Khurana, Director, Centre for Science and Environment (CSE), New Delhi
5. Antonio Picasso, Director General of Competere – Policies for Sustainable Development, Italy
6. George Cheriyan, Director, CUTS International, Jaipur (Moderator)

Proceedings

George Cheriyan, Director, CUTS International, moderated the session and delivered his opening address. He briefly touched upon the webinar objectives, explained the context for the consumer representatives, and shared the background of the FoPL process in India and its purpose. He also introduced the key speaker and discussants of the webinar.

Cheriyam, a member of FSSAI as a special invitee, delivered his opening address by strongly objecting to some of the findings of the IIM Ahmedabad study on FoPL. He quoted that our country's policymakers should remember that NCDs contribute to 62 percent of total deaths in India; of concern are the preventable premature deaths, which account for a staggering 48 percent of mortality. Presently, the food regulator who has the mandate to ensure safe food to the people of this country ignored the aspect of NCDs, linkage with food high in sugar, salt and fat, and the role FoPL can play while choosing the format FoPL.

Opposing the HSR label, he also flagged that this label is only implemented in two countries: Australia and New Zealand. In 2014 and after five years, a study by the Deccan University pointed out that the current HSR System's design, design, and implementation is misleading consumers. About the healthiness of many foods, HSR inadvertently provides a health halo for almost 75 percent of the ultra-processed food and 50 percent of the discretionary food displaying the symbol HSR is unlikely to discourage consumers from buying the products high in sugar, salt, and saturated fat.

HSR system, which is quite similar to the energy rating label used on our electrical appliances, is highly flawed as unhealthy food products can still get a high score as the rating is based on the overall nutritional value. Any inclusion of healthy ingredients, like fibre and protein, to an otherwise unhealthy product, could easily cancel out its unhealthy ingredients (i.e., sugar, saturated fats, and salt).

He also quoted the views of Grant Schofield, Chief Health and Nutrition Advisor to the Ministry of Education, New Zealand, 'the HSR is already dead in the water. The algorithm is flawed in the combination of fat, salt, and sugar. Previously, very high sugar foods can get 4+ health stars. He also added further that we should learn from the experiences of Australia and New Zealand and be cautious against the adoption of HSR. Indian regulators must choose a simple and interpretive label that aids consumers to choose between healthy and less healthy products.'

Dr. Lindsey Smith Taillie, Assistant Professor at the University of North Carolina, gave a detailed presentation touching upon different kinds of labels, particularly given the context touching upon the HSR label and the warning label. She pointed out that even after eight years of implementing the HSR label in Australia, there is still no evidence of it significantly impacting the nutritional quality of people's food and beverage purchases. This type of label promotes ultra-processed food products by confusing the consumers. She added that a warning label, which has a broader global acceptance, helps achieve the two most important goals of a labeling system, i.e., informing consumers and reducing consumption of unhealthy foods. She also highlighted a few evidence to prove her stand. She even spoke about a field experiment done in India very recently to test whether FoPLs helped Indian consumers identify 'high-in' foods and reduce intentions to purchase them.

Lindsey, who has published over 115 articles in top academic journals and her work on front-of-package labeling featured in the New York Times, the Guardian, and other international media outlets, elaborated about an in-person randomised experiment study covering 2,869 adults between ages 18 and 60 years old in six states of India. Participants were randomised to five FOPLs: a control label (barcode), warning label, HSR, Guideline Daily Amount (GDA), or traffic light label. Fewer than half of participants in the control group (39.1 percent) correctly identified all products high in nutrient(s) of concern. All FoPLs led to an increase in this outcome, with the most significant differences observed for the warning label (60.8 percent) followed by the traffic light label (54.8 percent), GDA (55.0 percent), and HSR (45.0 percent). Relative to the control, only the warning labeled a reduction in intentions to purchase the products. The results suggest that warning labels are the most effective FOPL to help Indian consumers identify and avoid unhealthy foods.

During the discussion, **Saroja Sundaram**, Executive Director, Citizen consumer and civic Action Group (CAG), Chennai, spoke about how Lindsey's presentation re-emphasise our campaign for a warning label. She stressed that HSR does not do well among the Indian population, and it will never support achieving the goal of FoPL and do not solve the purpose.

Ashim Sanyal, Chief Operating Officer of Consumer VOICE and a member of the Central Advisory Committee of FSSAI, pointed out the presentation and the findings of the study carried out by Dr. Lindsey. Her team once again highlighted how our regulators are on the wrong foot and said basically. We are headed towards a major disaster by adopting HSR. Through the HSR label, our regulators are trying to convey something beyond the understanding of a common consumer. We need to understand that the consumer should understand what's being stated. And that's the most difficult part because consumer awareness of these subjects is very low, especially in a multilingual, multi-demographic country like India, as mentioned earlier and seen during the study. He said that the warning labels convey that message within the eight to ten seconds to identify a particular food, whether it's good, bad or unhealthy, whatever the consumer wants to look at.

Amit Khurana, Director, Centre for Science and Environment, New Delhi, while sharing his journey with FoPL regulation and discussions, hoped that FSSAI would someday muster the courage and deliver the mandate they are given. He claimed that none other than FSSAI better knows that symbol-based labels would do wonders among consumers in India, given their experience with labels/logos highlighting veg, non-veg, vegan foods etc.

He mentioned how nutritional information labels are not working in India, and it is just a very carefully crafted strategy to not tell people how bad the food is. He strongly advocated for FoPL, especially an interpretive and straightforward warning label, which can overcome language and literacy barriers. He said that this is the lowest point that we have seen very categorically. When we are about to see Health Star Rating, imagine the regulator with laws

related to misleading claims and very strongly promoting something designed to mislead. He said that he has a strong faith in the scientific community of this country and the institutions of this country and hopes that things will get better and we all need to raise the pressure and hope that common sense will prevail.

Before concluding, **Antonio Picasso**, Director General of Competere, Italy, whose organisation is closely following the developments happening in India on FoPL, shared with the audience their ongoing anti Nutriscore campaign launched in Europe. Their campaign is to promote digitalisation and innovations for nutrition education and nutrition policies that respect the consumers and the values of Europe.

While sharing his thoughts, Sanjay Pandey, National Consultant, GHAI, said it was wonderful to hear Lindsey's presentation and the other discussant involved in the FoPL process. He said that the issues are clear, and we need a simplistic warning label instead of the regulator's HSR. He also stressed that FoPL has to be mandatory, not volunteer, and most importantly, WHO's nutrition profile model should be followed. He underlined that the regulator - FSSAI, should listen to the civil society groups to protect consumers' health and safeguard them from NCDs, rather than be biased towards the industry. We need FSSAI to be neutral and take a stand for the benefit of the people.

Summing Up and Vote of Thanks

Simi TB, Policy Analyst, CUTS International, briefly summed up the proceedings. The webinar provided an overview of FoPL discussions happening in the country. It explained to the audience the developments happening from the regulator's side regarding FoPL and why health and advocacy experts in India are strongly pitching in for simple and effective warning labels instead of HSR.

She expressed her heartfelt gratitude to all the panellists: Lindsey Smith, Saroja Sundaram, Ashim Sanyal, Amit Khurana and Antonio Picasso, for sharing their valuable thoughts on the topic. She also thanked participants, especially the representative of various consumer organisations, State Food Safety commissioners, health experts, etc., for actively participating in the webinar.