



CAG

Citizen consumer and civic Action Group

CONSUMERS DEMAND WARNING LABELS

*A study on the need for Front of Pack
Warning Labels (FoPL) on processed
foods in Karnataka*

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Disclaimer: The information in this report is based on a study conducted by CAG in Karnataka. The authors accept no liability whatsoever for any direct or consequential loss arising from the use of this document or its contents.

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About CAG

CAG is a 36-year-old non-profit and non-political organisation that works towards protecting citizens' rights in consumer, civic and environmental issues and promoting good governance processes including transparency, accountability and participatory decision-making.

GLOSSARY AND ABBREVIATIONS

NCDs - Non-communicable diseases

FSSAI - Food Safety and Standards Authority of India

FoPL - Front of Pack Labelling

HSR - Health Star Rating

HFSS - High Fat, Salt and Sugar

WHO - World Health Organisation

SEARO - South-East Asia Regional Office

FBO - Food Business Operator

FoP - Front of Pack

HFSS - High in fat, salt and sugar

IIM - Indian Institute of Management

AIIMS - All India Institute of Medical Sciences

ISI - Indian Standards Institution

MRP - Maximum Retail Price

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Executive Summary

An unhealthy diet is one of the most important risk factors for non-communicable diseases (NCDs) across the country, correlating with increased risk of overweight, obesity, cardiovascular disease, diabetes, and some types of cancers. Therefore, one of the biggest challenges for the country is to promote a healthier diet for its people. Modern diets in India consist of large proportions of processed foods that are often high in salt, sugar and fats which are the main contributors to the high incidence of NCDs in the country. Consumers typically have very little knowledge about the presence of these nutrients of concern in these products. Nutritional information on the back of the pack is available but the scientific terms, legibility and numerical values are difficult to understand and interpret. Hence, informing consumers through interpretative, clear and simple warning labels about the presence of negative nutrients (namely sugar, salt and fats) is essential to help consumers make informed choices.

In response to the looming NCD crisis, the FSSAI has proposed use of the Health Star Rating (HSR) system. This system already has an unsuccessful track record in countries like Australia, because of its low ability to curtail or influence food consumption decisions.



Example of a [Health Star Rating](#) system used in Australia

Countries like Chile and Israel have adopted strong warning labels. The design of these labels help consumers clearly understand the presence of high levels of salt, sugar and fat in these products, thus leading to more informed choices. Subsequent studies from these countries reveal that the buying of food products “High in” has considerably reduced, leading to reformulation by the industries.



Example of [Front of Pack Warning Label](#) (FoPL)

Consumer groups in India are therefore against the HSR system which does not fulfil its purpose of warning consumers off unhealthy foods. To study and understand the consumer interests and preferences for the information on front of pack labels of processed foods, CAG conducted a survey among 904 consumers in Karnataka. The study underlines the preference for warning labels with nearly 92% of consumers in the study demanding information on the presence of high amounts of salt, sugar and fat in processed food products for safe health; and 56% of respondents preferring clear warnings about the presence of high salt, sugar, fat on the front of the pack.

1 INTRODUCTION

The Front of Pack labels (FoPL) is an effective tool that assists consumers about the presence of nutrients of concern in processed food products that are harmful to health and guide consumers in decision making while purchasing such foods. It indicates which processed products have high fat, salt and sugar (HFSS) content. FoPL helps in conveying information to consumers on these nutrients of concern thereby empowering them to make healthier food choices and reduce their risk of chronic diseases. FoPL acts as a major instrument in the fight against NCDs, the warning provided by FoPL helping in reducing the consumption of HFSS foods. FoPLs makes it easy for consumers to compare food products, while also keeping manufacturers in check. Defining the thresholds for presence of salt, sugar and saturated, total fats in foods and how the labelling should appear are the two major components of FoPL.

1.1 Background on FoPL

FoPL was introduced in the draft [Food Safety and Standards \(Labelling and Display\) Regulations, 2018](#) issued by the Food Safety and Standards Authority of India (FSSAI). The proposed thresholds for the negative nutrients were in line with the WHO suggested SEARO model. However, there was strong opposition from the industry as a result of which the regulations were notified after removing the FoPL provisions. Later, the FSSAI, in collaboration with [Nutrition Alchemy](#) decided to undertake a study in 2019 to understand the Indian marketplace. The outcome of the study again suggested thresholds that fell in line with the WHO proposed model. The industry refused to accept this yet again. In January 2021, FSSAI restarted the consultations and Citizen consumer and civic Action Group (CAG) was invited to be a part of the consultative committee. A working group of experts was formed to come up with a new set of the thresholds. The thresholds proposed by the working group were much higher than the WHO proposed thresholds. Consumer groups did not agree to this as it was against consumer interests. The working group members were advised to reconsider their suggestions and they are yet to present their final set of recommendations on thresholds. As for the design of the label itself, FSSAI proposed the HSR design followed in Australia and New Zealand. FSSAI had engaged the Indian Institute of Management, Ahmedabad to understand consumers' preferences. The outcome of the study revealed HSR to be the preferred choice. Consumer groups were against it as the health star rating design overshadows the negative ingredients of the product by upholding the positive ingredients. In addition, consumer groups listed the following reasons to demonstrate why HSR was not a good choice:

- Consumers will not precisely know if a processed food product is high in salt, sugar, or fat and will therefore not be able to make an informed choice based on their personal requirements or health condition.
- Star labelling for energy-efficient products was introduced in the early 2000s. Studies reveal that even today, consumers, especially those from rural areas, rarely look for star labels on products.
- Education to read and understand star labels would be an effort in itself.
- Global experiences show HSR to be a failure. For example, in Australia which follows the HSR design, it was found to be a failure as the ratings did not convey anything of value, nutrition-wise, to the consumer.

Another study conducted by the All India Institute of Medical Sciences (AIIMS) revealed that the consumers preferred warning labels rather than Health Star Ratings.

Consumer groups are demanding clear, interpretative, effective warning labels that would cut across the barriers of multiple language and illiteracy in the country and inform consumers of the presence of high salt, sugar and fat in processed foods.

FSSAI is keen to finalise the FoPL regulations and is organising frequent consultations. Under these circumstances, in order to get the Regulations notified without any dilutions that could result in consequences to human health, CAG will be coordinating with other civil society organisations and consumers from the south, especially from the states of Tamil Nadu, Karnataka, Telangana and Andhra Pradesh and gather their support and build momentum for early notification of strong front of pack warning labels regulations.

2 RATIONALE OF THE STUDY

The study was done in Karnataka and the aim of the study was to understand if consumers read labels on food products; looked for any nutritional information on labels; were concerned about the presence of high salt, sugar and fat in food products, especially those consumed by children; preferred information on the front of processed food products on the presence of high quantities of negative nutrients; and, how they would like the information to be presented on the front of packs.

3 STUDY METHODOLOGY

3.1 Data collection

[Survey](#) questionnaires were developed and administered to consumers in Karnataka.. The questionnaire used a mix of close and open ended questions, and designed as a google form. It was circulated among respondents with the help of a consumer group in Bangalore, using a random sampling technique. A total number of 906 answered questionnaires were collected digitally and analysed. The respondents included both

men and women and covered an age group between 19 and 73 years. The respondents belonged to different occupational groups including students, professionals, agriculturists, home makers, and businessmen, etc

4 FINDINGS FROM THE STUDY

4.1 Information on labels

Information printed on labels include MRP, manufacturing date, expiry date, ingredients, percentage of ingredients, ISI logo, vegetarian or non-vegetarian logo, manufacturer's address, net weight, product name, brand and its nutritional information. 54% of respondents said they look into all of the information in the packaging, while the rest considered individual pieces of specific information such as expiry date, MRP, vegetarian logo etc.

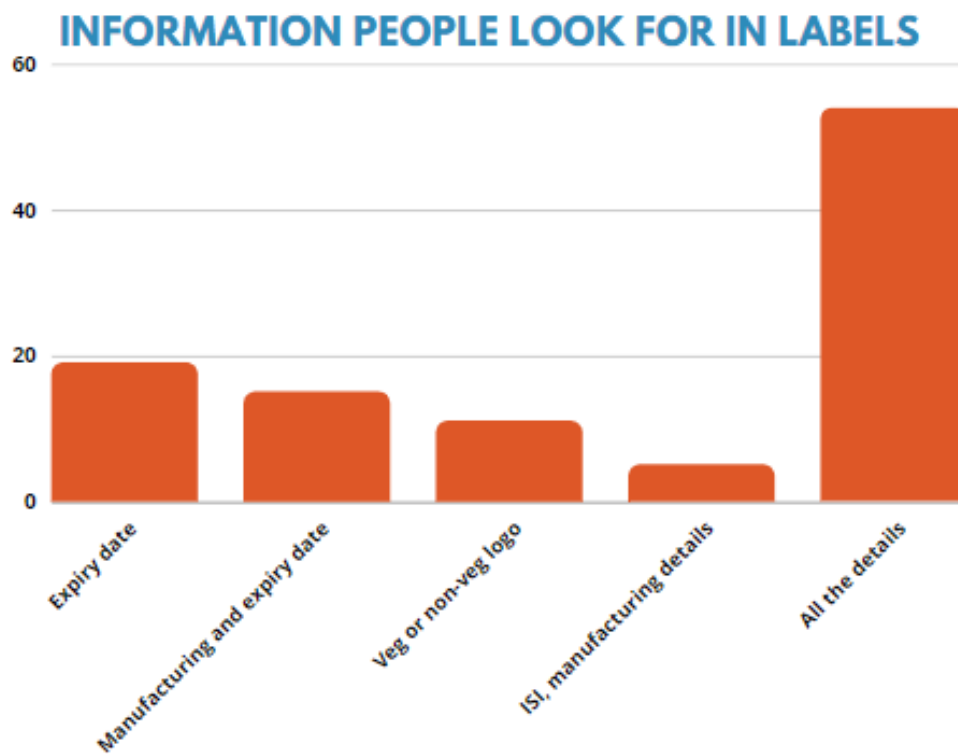


Fig 1: Information people look for in labels

4.2 Reading nutritional information

68% of respondents said they read the nutritional information printed on the pack of processed foods while 32% overlooked reading nutritional information for various

reasons such as limited time to read, difficulty with understanding the information, language problems, difficulty reading the font size, and blind trust on brand.

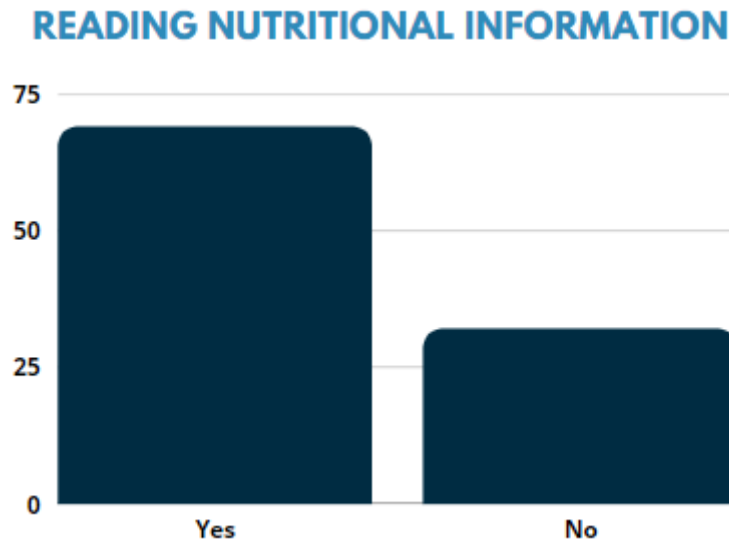


Fig 2: Consumer behaviour in reading nutritional information present on processed foods

4.3 Information about the quantity of salt, sugar or/and fat present in the products

A high number of respondents (82%) say that food labels on processed foods do not provide information about the quantity of salt, sugar or the fat present in products.

INFORMATION ABOUT THE QUANTITY OF SALT, SUGAR AND FAT PRESENT IN THE PRODUCTS

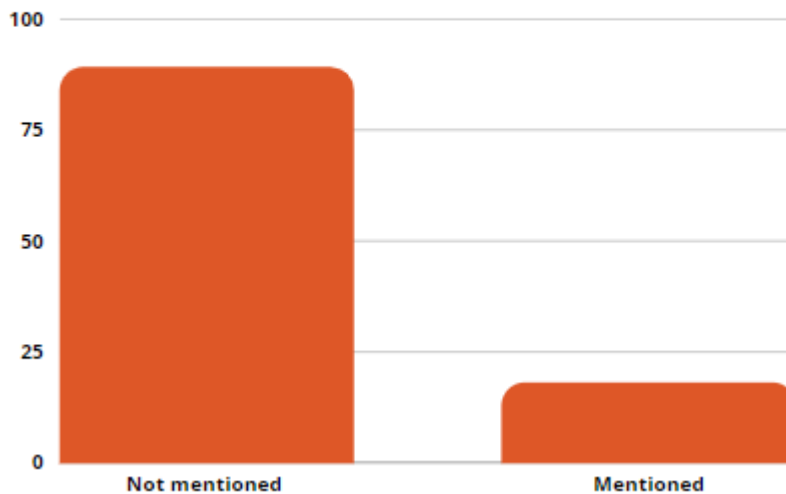


Fig 3: Consumers' opinion on current labels that carry information on the quantity of salt, sugar or fat

4.4 Information on high levels of salt, sugar or fat on packed food packets

61% of respondents said that processed food products do not reveal if their product contains high levels of salt, sugar or fat.

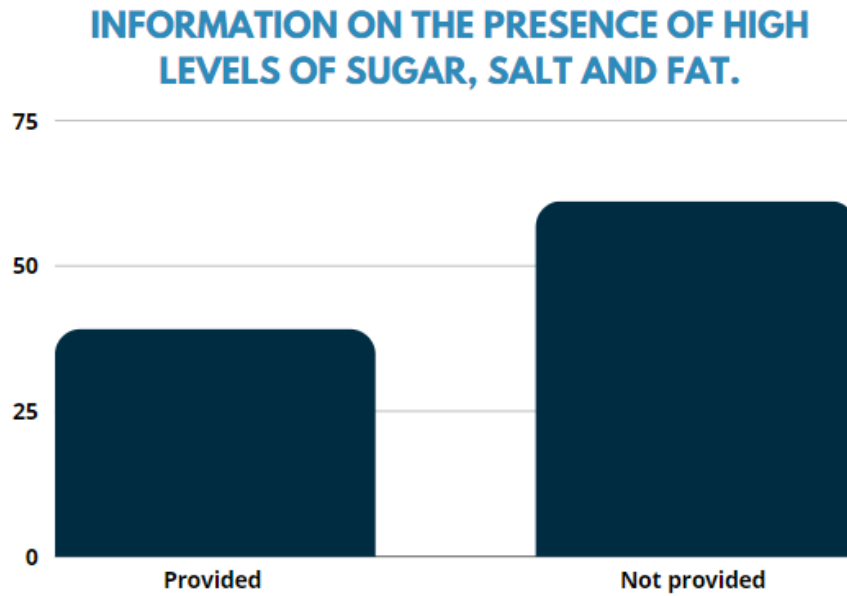


Fig 4: Consumer's opinion on current food labels stating the presence of HFSS .

4.5 Awareness on the harmful effects of increased in-take of salt, sugar or/and fat

Intake of high levels of salt, sugar and fat leads to various health problems. However, only 67% of the surveyed people knew that diabetes, hypertension, obesity, cardiovascular diseases affecting human health were the resulting health problems. 12% felt that they 'did not have sufficient knowledge on the subject', 9% were aware of the connection between HFSS and diabetes, 5% with obesity, and another 5% between HFSS and diabetes and hypertension and 2% with cardiovascular diseases.

AWARENESS OF DISEASES CAUSED DUE TO HFSS

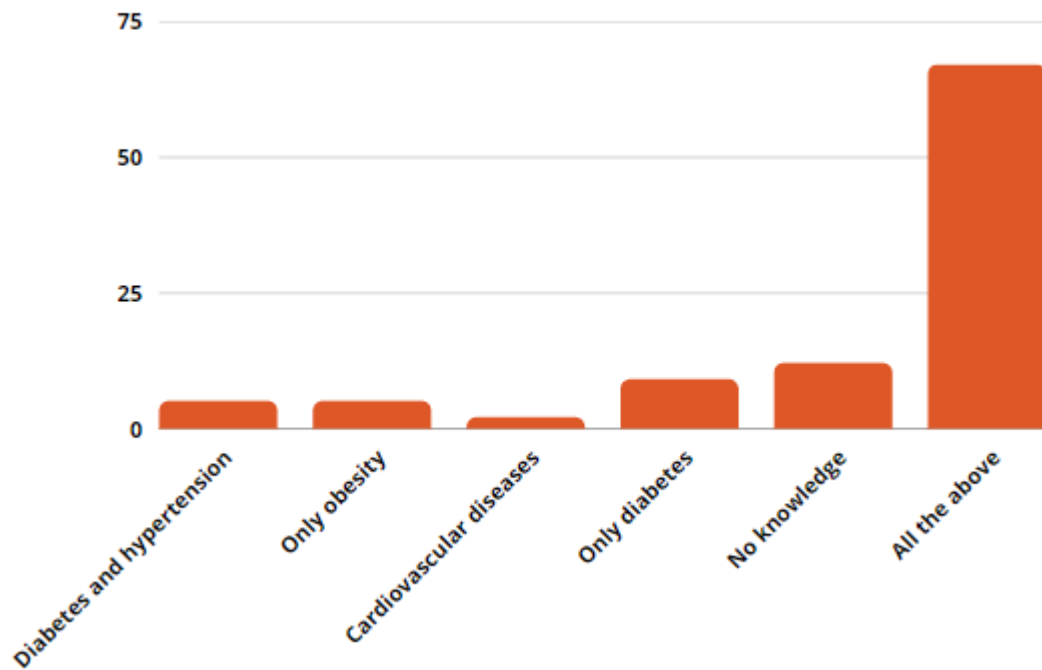


Fig 5: Respondents awareness of diseases caused due to increased intake of salt, sugar or fat.

4.6. Consumers' preferences for indication of HFSS on a food product

According to the survey conducted, 92% of consumers wanted information on the presence of high levels of salt, sugar and fat. .

PREFERENCE ON WANTING TO KNOW ABOUT HFSS

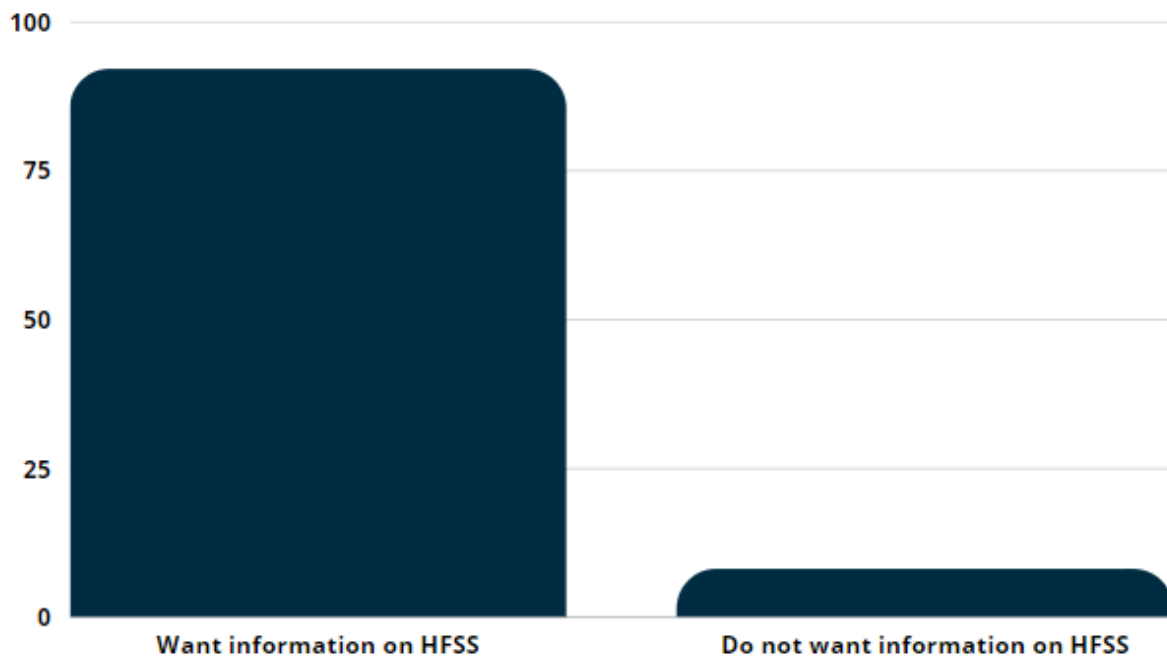


Fig 6: Consumers' preference on wanting to know about HFSS

4.7 Consumers' expectations of label design for information on HFSS

The majority (56%) said that they wanted the FoPL to carry clear warnings about HFSS. 24% want ratings used to indicate the nutritional value of the food. 20% of the respondents want grades using symbols like traffic lights to inform them if a product is mildly, moderately or extremely harmful.

CONSUMER PREFERENCES FOR LABEL DESIGN OR STYLE

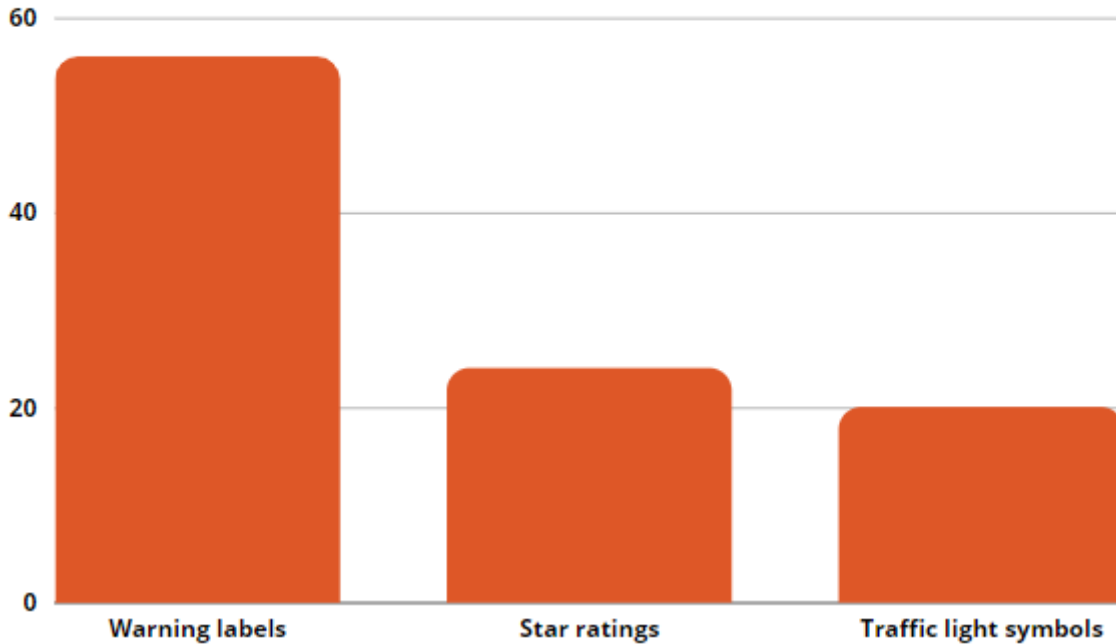


Fig 7: Consumer's preferences for style in which HFSS information is conveyed

4.8. Parental warning to children consuming foods with HFSS

Most of the parents (87%) caution their children regarding the dangerous effects of high salt, sugar and fat intake.

PARENTAL WARNING TO CHILDREN CONSUMING FOODS WITH HFSS

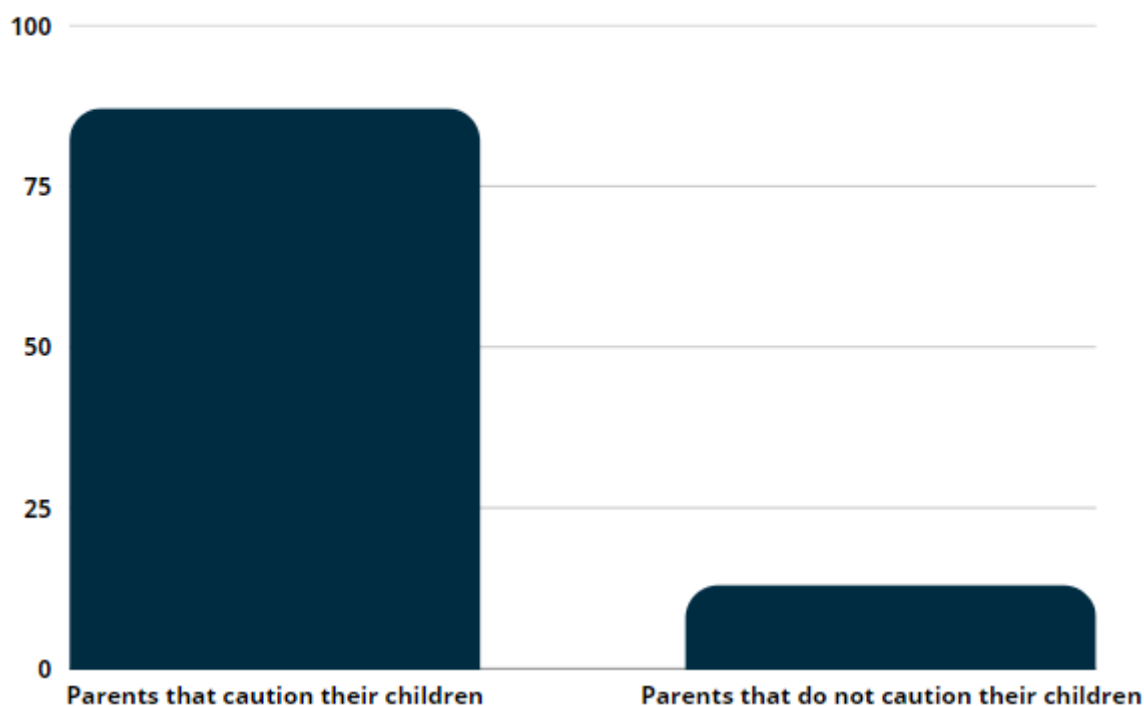


Fig 8: Percentage of parents warning their children on the effects of HFSS

4.9. Reasons used by parents to caution their children on HFSS.

52% of parents stated the following reasons for cautioning their children - processed foods are not good for health, cooked food is healthier than processed food and processed foods contain high levels of salt, sugar and fat.

18% specifically recorded that their reason was the presence of high salt, sugar and fat in processed food; likewise, 34% said that it was because the consumption of HFSS food is harmful to their health. .

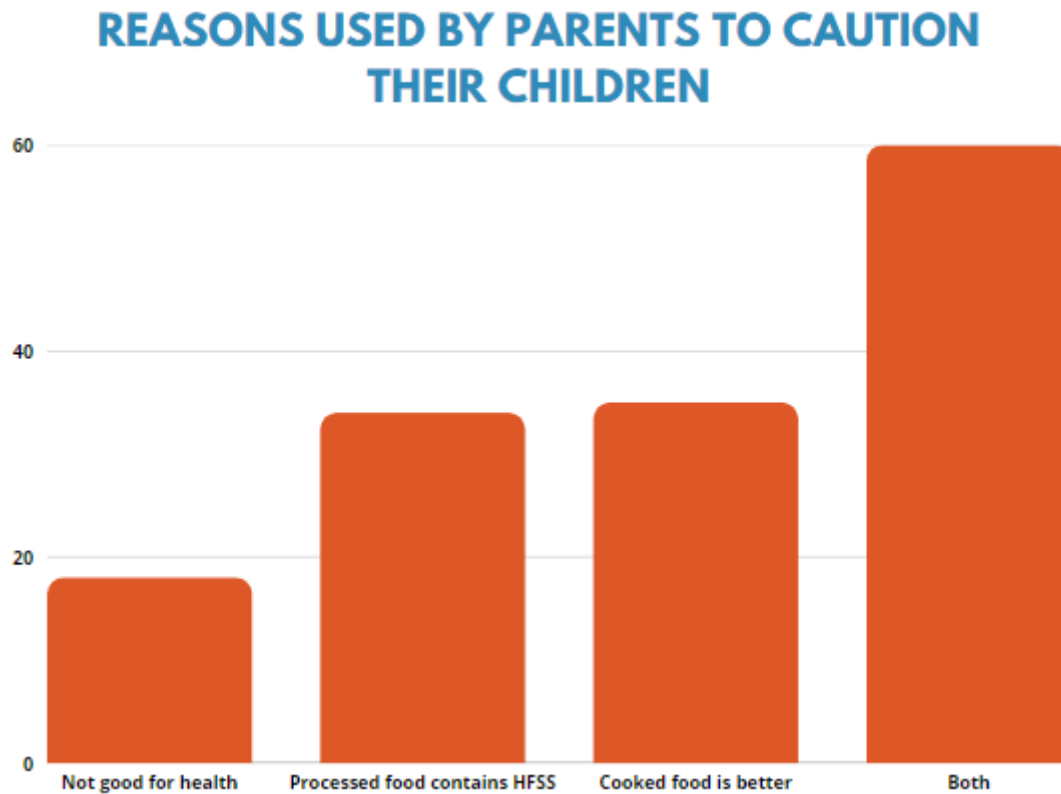


Fig 9: Reasons used by parents to caution their children against HFSS

4.10. Reasons for consuming packaged food

Around 66% of consumers choose processed foods because of their convenience value. 12% of consumers crave the taste of it and want to consume more and more. 7% of consumers state that it is more tasty and delicious than home cooked food. 15% of consumers trust and like the brand that manufactures the product.

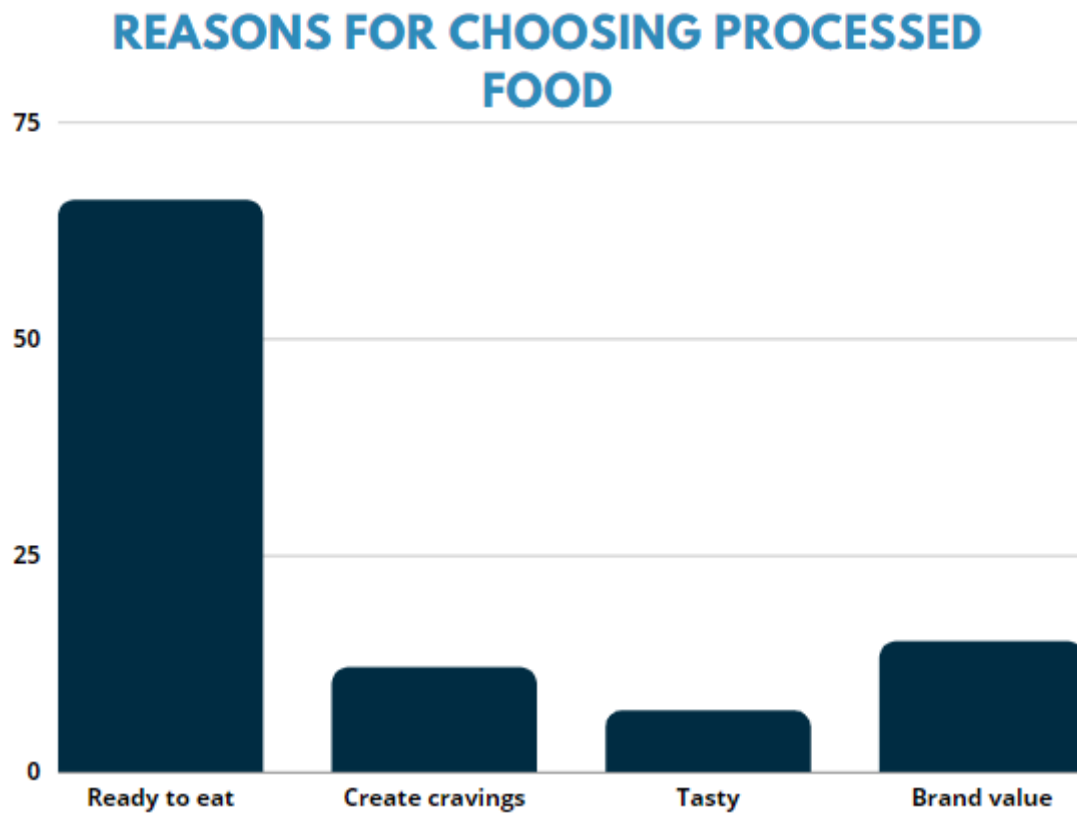


Fig 10: Reasons for choosing processed foods

4.11. Effective solutions against consumption of HFSS

60% of consumers believe that education at the school level is an effective way to prevent children from consuming packaged food containing high levels of salt and sugar. 27% consumers feel that it is parents who should teach children about the dangers of packaged foods. 13% of consumers feel that it is the joint responsibility of both teachers and parents to caution children about the side effects of packaged food which contain high levels of salt, sugar and fat.

Parents' opinions on effective solutions to prevent children from consuming HFSS food

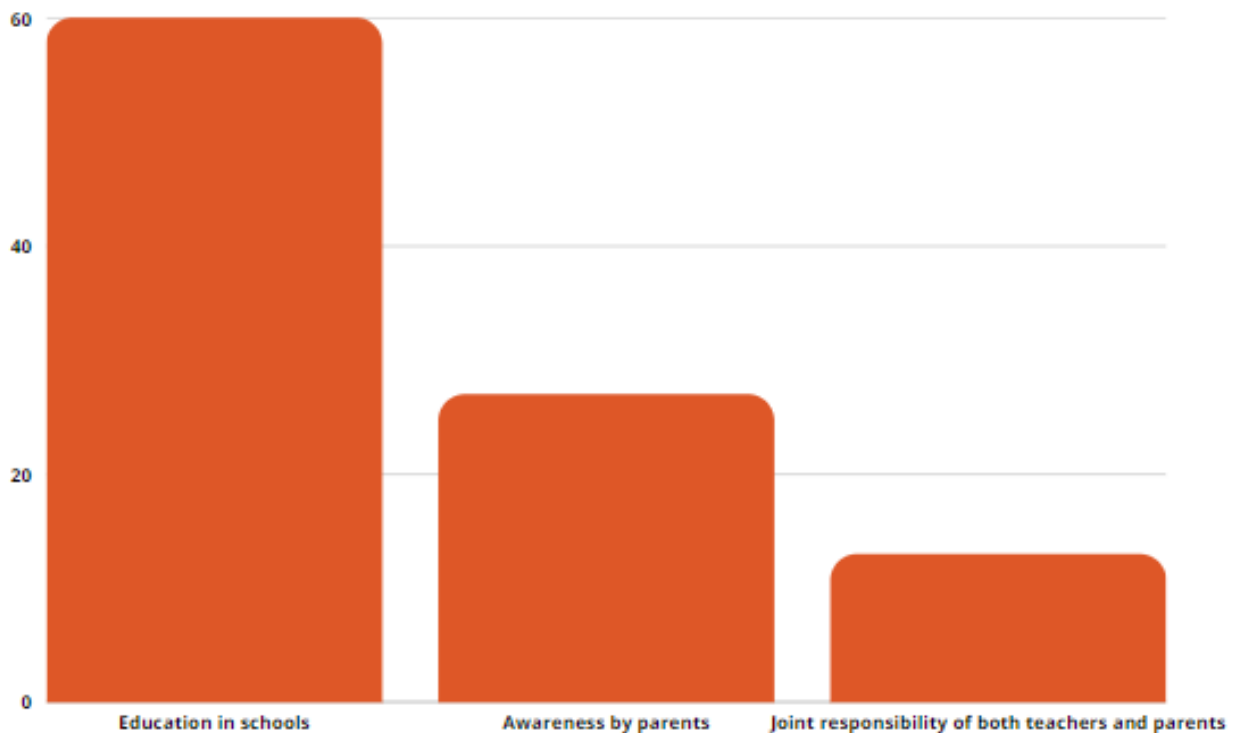


Fig 11: Parents opinion on effective solutions to prevent children from consuming high salt, sugar or fat in packed foods

6 INFERENCES FROM THE STUDY

It is worrying that while 88% of consumers are aware of the health risks of consuming HFSS foods, only 32% are actually reading labels to understand the nutritional information of the foods they are consuming. At least some of this (as found by the survey) is because of the poor quality or complex nature of the information currently carried on food products. Supplanting information of this quality with a HSR style label might not change these numbers very much.

Interestingly, despite being aware of the risks of HFSS, 66% of consumers acknowledge that processed foods are convenient. With this dichotomous thinking among the public, industries will be better off reformulating their recipes to healthier options, than fighting the implementation of warning labels. This will do much to build confidence among the public. This is especially important as nearly 87% of

consumers are warning their children about the consumption of HFSS, showing an intuitive level of discomfort about feeding these to their children.

A good majority of those interviewed wanted to be informed about HFSS. And with regards to how HFSS is depicted, a significant majority chose warning labels over other styles of depiction. This must be taken into account as the FSSAI is poised to make decisions about front of pack label design.

7 CONCLUSION

The study, though brief, clearly indicates that consumers prefer clear warnings about the presence of high salt, sugar and fat on the front of processed foods. Considering the diversity in the country with regard to language and literacy, it is important that the FSSAI reconsiders its view of going ahead with implementation of the Health Star Rating. A failure of the system at this stage, could lead to significant loss of lives and quality of life among an already vulnerable population. This is apart from the wasted time, money and resources used to create a system that will eventually have to be re-thought again. Simple, clear, interpretative, effective warning labels on HFSS on front of packs are the need of the hour. This would lead to the industry considering reformulation of their food products that would be beneficial to them as well as the consumers.

8 APPENDIX

Please find here the survey form used to gather information:

<https://www.cag.org.in/database/survey-perception-consumers-and-parents-about-packed-food>



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