

A discussion with food manufacturers on Front of Pack Warning Labels

Date: 8th March 2022

Venue: Online event

CAG in collaboration with Tamil Nadu Small and Tiny Industry Association (TANSTIA) organized a meeting, titled 'Front of Pack Labelling (FoPL) - A discussion with food manufacturers' on 8th March 2022. The aim of the meeting was to sensitize the food industry about the strong link between non-communicable diseases (NCDs) and FoPL, the importance of warning labels, and to gain manufacturers' perspectives on this serious issue. The event had participation from processed food manufacturers namely, ARB organics, SR Pure organics, Sangamam organics, Tamil Nadu cashew association, NFG organics, Ginni Naturals, and Noah foods. The speakers included Dr. Mohammed Ibrahim, Cardiac Surgeon, SIMS, Chennai, Dr.A.J. Hemamalini, Professor and Head, Department of Clinical Nutrition, SRFHS, Sri Ramachandra Institute of Higher Education and Research [DU], Chennai and Mr. Raja Chidambaram, Advisor of TANSTIA.

Mr. Mariappan, President of TANSTIA welcomed the audience by stating that the need of the hour is to build awareness among consumers on the need for FoPL as this will eventually play a crucial role in manufacturers producing healthier food for Indian consumers. The Food Safety and Standards Authority of India (FSSAI) introduced the FoPL for packed food under the Food Safety and Standards (Labelling and Display) Regulations, 2018. However, the regulations are yet to be notified. It is essential that the regulations be soon notified for food manufacturers to adapt and comply.

S. Saroja, Executive Director, CAG gave a brief introduction to the topic by specifying that most packed foods are high in salt, sugar and fat, and hence the effort towards bringing FoPL regulations is to help consumers make informed choices. Cases of diabetes and hypertension are prevalent in both rural and urban India and are increasing by the day. Due to market penetration, processed foods are easily available. Therefore, it is important that we have customised, interpretative, clearly communicative, warning FoPL with effective messaging, that will cut across barriers like illiteracy, multiple languages, etc. The requirement is very clear and it is only fair that it is provided in a clear, effective manner. Clear communication is especially crucial to rural consumers. Health star rating label design could not be a good choice because it will suppress the presence of negative nutrients in the food product if other good nutrients are also present, thus providing a better star rating for the product. This will defeat the purpose of FoPL.

Saroja went on to explain this with an example. While a person diagnosed to be hypertensive is advised to reduce the salt intake by her/his doctor, a clear FoPL will make it easier for her/him to choose appropriate foods based on her/his needs. She/He can avoid those packed foods that are indicated as high in salt. Over a period of time, this will influence her/his shopping habits, which will ultimately lead to a healthier lifestyle. This is the aim behind FoPL. On the other hand, if Health Star Rating (HSR) were to be implemented, consumers'

decisions on healthy foods and accommodating doctors' advice might not be so straightforward.

Dr. Mohammed Ibrahim, Cardiac Surgeon, SIMS was invited to talk about non-communicable diseases (NCDs) and how the nutrients of concern - salt, sugar and fat play a major role in causing NCDs. He mentioned that Indians are increasingly diagnosed with NCDs which need long-term treatment and care. The major risk factors for NCDs include tobacco use, alcohol consumption, an inactive lifestyle and an unhealthy diet. Under unhealthy diets, the consumption of food that's processed, ultra-processed, and high in salt, sugar, and fat are particularly instrumental in the rise in NCD incidence. As a nation, we should be conscious about what we eat. We should make the effort to read food labels, especially looking out for nutrients of concern. He also categorised the various diseases by their cause and prevention methods; and detailed the ill effects of consuming products high in salt, sugar and fat.

Dr. Hemamalini. AJ, Professor and Head, Department of Clinical Nutrition, Sri Ramachandra Institute of Higher Education and Research (DU) spoke after the Cardiac Surgeon about healthy food choices with an emphasis on high salt, sugar and fat consumption and the importance of nutritional thresholds. She explained that nutrient profiling is a scientific method of categorising foods according to their nutritional composition and was developed with the main objective of reducing the consumption of salt, fat and sugar. Nutrition profile models (NPM) translate this into specific food and beverage targets and help us to identify foods that are high in salt, sugar, and/or fats. Based on the "limits" established by the NPM, the front-of-pack label informs consumers in a clear manner whether a product contains excessive sugar, salt, and/or fat, thus helping them make healthier choices. The limit of food fat intake has been set to be maximally at 30% of total calories per day. This amount totals 60-65 g per day, in an 1800-2000 kcals diet. This translates roughly to 12-13 teaspoons of fat per day, which can come from cooking oils, ghee, butter, and around 50-75 g of non-vegetarian sources. The WHO recommendation of salt intake is less than five grams per day. This approximates 2300 mg sodium per day. In terms of household measurements, this equals to less than one teaspoon of salt per day. A 2017 study in India, reported an average consumption of 10.9 g per day, which is double the recommended level. The simple sugars, that are obtained from simple carbs, sugar, aerated drinks, packed and processed foods, and bottled drinks amount to approximately 300-450 grams of carbs per day. Ideally, this should come from complex sources, such as whole grains, fruits and vegetables. . To improve overall health, and in order to avoid being the victim of NCDs, an individual should carefully select their foods, and restrict the intake of excessive salt, fat and sugars. A popular saying in Tamil goes "Beyond a particular limit, even amruth becomes poison". Hence, fat, sugar and salt, though essential components of food, should be used judiciously and cautiously to avoid their detrimental effects.

Finally, Mr. Raja Chidhambaram, Advisor of TANSTIA ended the session with his statement saying that we should reach out to large numbers of consumers and build awareness of the importance of Front of Pack Labelling. Media reports suggest that FSSAI is in favour of

Health Star Rating (HSR). HSR will dilute the objective of FoPL as we've already seen from the energy star rating used by the power sector. They have been found to not influence consumer behaviour greatly. He explained the best practices of FoPL from all over the world and concluded by saying that warning labels are better suited for the Indian population and food manufacturers will adhere if regulations are in place.

Owners of two manufacturing industries gave their supporting statements at the end of the session. Ms. Priya, Proprietor of SR Pure Organics emphasised that strong warning labels will help build consumer awareness and influence purchase decisions. Ms. Anuradha Balaji, Proprietor of ARB farms, which produces a variety of juices and other foods, said that front-of-pack labeling is key to understanding the nutritional value of a food product. The label should be simple, clear, and accurate.