## **Need for a Strong FOPL in India-position Statement**

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#### **Abstract**

Due to lifestyle changes, urbanization, and the rise of ultra-processed foods (UPF), India is undergoing a rapid nutritional transformation. These dietary shifts have significantly contributed to the rise in non-communicable diseases (NCDs), which now account for a substantial portion of mortality and disease burden in the country. A strong Front-of-Pack Labeling (FOPL) system is recommended in this position statement as a powerful public health tool to address this issue. Through the provision of easily comprehensible nutritional data, FOPL encourages food producers to create healthier goods while empowering customers to make educated dietary decisions. Current labeling practices in India, such as the Indian Nutritional Rating (INR), fall short due to complexity and voluntary implementation. This paper evaluates international best practices, including warning labels and color-coded systems, highlighting their effectiveness in reducing the consumption of high-risk foods. We argue for straightforward, uniform, and globally evidence-based approach to mandatory FOPL implementation. Policymakers, industry stakeholders, and public health advocates must collaborate to develop an FOPL system that addresses India's unique dietary landscape. Such an initiative is crucial to reducing the NCD burden and fostering healthier eating habits nationwide.

Keywords: Noncommunicable Diseases, Public Health, ultra-processed foods Urbanization

Across the globe, people are going through a phase of nutritional transition where they depend increasingly on easily accessible pre-processed and packaged food. [11] As a result of rising ultra-processed food manufacturing, aggressive marketing, rising urbanization, and changing lifestyles, people's dietary preferences and choices have changed. In contrast to dietary fiber-containing foods, especially whole grains, the modern population consumes a greater proportion of foods high in energy, fats, free sugars, and sodium, and consumes insufficient amounts of fruits, vegetables, and other high-fiber meals. [2]

The introduction of such an unhealthy diet has drastically altered the food system and contributed to the development of NCDs. With non-communicable diseases (NCDs) responsible for 41 million deaths globally each year, or 74% of all fatalities, and around 77% of those deaths occurring in nations with low to middle incomes, NCD prevention is a critical public health concern. In India, the proportion of deaths due to NCDs has increased from 37.9% in 1990 to 61.8% in 2016, with the disease burden rising from 30% in "disability-adjusted life years" (DALYs) in 1990 to 55% in 2016.



Environmental and behavioral variables are to blame for the reported rise in the prevalence of NCDs.<sup>[6,7]</sup> The choices made about nutrition are one of the primary moderating components, and they typically have a bigger impact than differences in being physically active.<sup>[8]</sup>

Another significant component of both individual and community health is the commercial determinants of health (CDoH). The term "commercial determinants of health" refers to three areas: unhealthful commodities that cause illness; company, marketplace, and political strategies that cause illness and are utilized to promote these products and obtain favorable laws; and universal variables that cause illness, such as globalization and market-driven economies, which have made it simpler to employ such harmful practices.<sup>[9]</sup>

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Public health initiatives strongly emphasize promoting low-energy-density meals and limiting consuming foods high in sugar and salt to encourage healthy eating patterns. [8] Thus, as part of an integrated strategy to improve eating habits at the level of the community, front-of-pack labels (FOPLs) on food containers are a crucial tool for providing buyers with easily accessible information about the nutrient content of packaged meals and encouraging producers to make their goods healthier. This is in line with the UN's stance that people have a right to information about the goods accessible in the food chain to allow them to make knowledgeable dietary decisions. [1] The U.N. Special Rapporteur on the right to health issued a strong statement in July 2020 advocating for implementing front-of-package warning labeling to combat non-communicable diseases. [10]

The food industry's intense opposition to mandatory regulation has been blamed for the majority of jurisdictions that have implemented FOPLs to date acting in their discretion, even though this is the best possible legislative approach to implementation—mandating the use of FOPLs on foodstuffs.<sup>[1]</sup>

### IMPORTANCE OF FOPL

The primary goal of FOPL can be accomplished, contingent upon priority, by promptly alerting customers about the nutritive value of food products or by alerting them when products have a high amount of added sugars, salt, and fats, which are the main components connected to high-risk factors that contribute to NCDs and other diseases.

Help is needed for consumers to recognize unhealthy items and make healthy decisions. Food shopping may be a complex activity for customers due to the vast array of products available. Even though more and more customers desire to make healthy choices, it is challenging for them to choose nutrient-dense products due to the wide variety of foods available. In less than ten seconds, the majority of customers choose an item, leaving them with insufficient time to examine the nutritional information panels that appear on the backside of the product's packaging.

Furthermore, the packaging of unhealthy products may make false promises about their nutritional value. Claims concerning a food's quantity of a particular nutrient and explicit or implicit claims regarding a food's possible health benefits can create a "health halo effect" for unhealthy products and lead customers to believe differently about the nutritional value of those products.

Globally, the availability of ultra-processed food items (UPP) has increased. These goods are often low in nutritional content and high in calories. Numerous studies demonstrate the substantial effects of eating ultra-processed foods on the main NCDs, such as obesity, diabetes, and hypertension. Researchers at the US National Institutes of Health (NIH) and Hall KD conducted a randomized control experiment in 2019 that found the most recent connection between obesity and NCDs.<sup>[11]</sup>

## **CURRENT STATE IN INDIA**

Since 2006, there has been a notable rise in packaged food consumption in India, as evidenced by the earnings generated by the sale of processed foods and beverages as well as the rising incidence of diet-related illnesses and obesity.[1] Notwithstanding the necessary nutrition information panels on packaged food products that were instituted in 2011, it has been observed that Indian consumers hardly utilize them because of their intricacy. According to research by Singh et al., food packets that were supposed to comply with FSSAI requirements did not, which made it challenging for customers to choose healthful options. Just 8.4% of the goods had an easily comprehensible Nutrition Facts Panel displayed.[12,13] The Food Safety and Standards Authority of India (FSSAI) submitted a draft of the Indian Nutritional Rating (INR) system as an alternative for FOPL in India on September 20, 2022, in response to the widely acknowledged need for the introduction of Front of Package labeling. Even though there is now no FOPL, the INR would be an upgrade, but prior research suggests that there may be a better FOPL system.[1]

#### Types of FOPLs

The FOP techniques used by different countries differ greatly from one another and are incompatible. Diverse FOPL models employ different strategies. The different types are as follows: Nutrient Specific System which gives information related to nutrients such as Color-coded FOPL types, such as Multiple Traffic Lights (MTL), were first adopted in the United Kingdom. Using color coding—green, yellow, and red, respectively—it presents data on fat, saturated fats, carbs, and salt content, classifying it as low, medium, or high.

The other type is the Summary Indicator System which gives information on whether the product is healthy or not depending upon several factors like the French-developed Nutri-Score labeling system and Health Stars.<sup>[14]</sup> Nutrition Warning Labels like the ones introduced in Chile give information of the level of a nutrient if it exceeds above the normal healthy value.<sup>[8]</sup>

#### Position of International Organisation

To help people choose more nutrient-dense options, the World Health Organization (WHO) recommended governments implement FOP labels in 2015. [8] WHO encourages member countries and academic institutions to continue data analysis to gain a deeper understanding of the effects of different FOPL schemes under different conditions. [15] The American Medical Association states that clear labeling on food packages is necessary to assist customers in selecting healthful foods. [16] Furthermore, the Global Federation of International Societies of Paediatric Gastroenterology, Hepatology, and Nutrition has released a position document that emphasizes the need to create social norms that protect children's and adolescents' health. The straightforward, color-coded FOP labeling of food products might be one such standard. [8]

#### CONCLUSION

Given that food choices are known to have a major influence on the onset of non-communicable diseases (NCDs), we think Front-of-pack labels (FOPLs) are an important tool for promoting healthier eating habits. By providing quick access to vital information regarding the healthfulness of packaged foods, the Indian Nutritional Rating (INR) system, a preferred option for Food and Nutrition Labeling (FOPL), would empower customers to make more informed decisions. Although this labeling system has limits, we are aware of them, but they will be outweighed by its benefits. By imposing taxes on harmful products and beverages, mandating unambiguous front-of-package labeling, and restricting the advertising of unhealthy foods, the government can exert control over the food and beverage industry. Therefore, legislators, public health advocates, and the food industry must collaborate to develop a standardized and mandated FOPL system that effectively gives nutritional information to consumers until that time. This concerted endeavor ought to be compliant with the global pledge to promote healthier eating practices and halt the growth of non-communicable diseases. To sum up, the incorporation of efficient FOPLs signifies a noteworthy advancement in the creation of a more knowledgeable and healthier global populace.

#### **S**TATEMENT

In the Indian context, the rise in packaged food consumption since 2006 necessitates a robust FOPL system. Based on an analysis of FOPL practices, over ten countries adopted the "Warning Label" type of FOPL because it is regarded as less complicated and more efficient to comprehend and provide lucid details regarding the food items, whether they are nutritious or not, to the customers at a quick look. While the Indian Nutritional Rating (INR) system is proposed as an improvement, recognizing its limitations, we assert the need for continuous efforts to explore and implement the most effective FOPL system that aligns with global best practices such as Warning Labels which has proved to be helping in reducing NCD burden wherever implemented.

The FOPL implementation guidelines should be made mandatory instead of voluntary. To guarantee that they follow the established legal procedures for legislative consultation, policy guidelines must set clear parameters for the kind and degree of industry participation.

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#### **Conflicts of interest**

There are no conflicts of interest.

#### REFERENCES

- Pettigrew S, Jongenelis MI, Lakshmi JK, Johnson C, Mahajan P, Praveen D, et al. Developing and testing front-of-pack nutrition labels in India: An experimental study. Food Qual Prefer 2023;112:105025.
- Diet, nutrition and the Prevention of Chronic Diseases: Report of a joint WHO/FAO expert consultation, Geneva, 28 January-1 February 2002. World Health Organization. Available from: https://www.who.int/ publications/i/item/924120916X. [Last accessed on 2023 Sep 11].
- Bera OP, Saleem SM, Bhattacharya S. Promoting healthier diets in India through "Front of Package Food Labeling". Indian J Community Health 2021;33:25-9.
- Non communicable diseases. World Health Organization. Available from: https://www.who.int/news-room/fact-sheets/detail/noncommunicablediseases. [Last accessed on 2023 Dec 08].
- Status of non-communicable diseases (NCDs) in India. Gov.in. Available from: https://pib.gov.in/PressReleaseIframePage.aspx?PRID=1796435. [Last accessed on 2023 Dec 11].
- Sugathan TN, Soman CR, Sankaranarayanan K. Behavioural risk factors for non communicable diseases among adults in Kerala, India. Indian J Med Res 2008;127:555-63.
- Budreviciute A, Damiati S, Sabir DK, Onder K, Schuller-Goetzburg P, Plakys G, et al. Management and prevention strategies for non-communicable diseases (NCDs) and the ir risk factors. Front Public Health 2020;8:788.
- Dereń K, Dembiński Ł, Wyszyńska J, Mazur A, Weghuber D, Łuszczki E, et al. Front-of-pack nutrition labelling: A position statement of the European academy of paediatrics and the European childhood obesity group. Ann Nutr Metab 2021;77:23-8.
- Kalra S, Verma M, Kapoor N. Commercial determinants of health: A critical component of the obesogenic environment. Clin Epidemiol Glob Health 2023;23:101367.
- Constantin A, Cabrera OA, Ríos B, Barbosa I, Ramírez AT, Cinà MM, et al. A human rights-based approach to non-communicable diseases: Mandating front-of-package warning labels. Global Health 2021;17:85.
- Champagne B, Arora M, ElSayed A, Løgstrup S, Naidoo P, Shilton T, et al. World heart federation policy brief: Front-of-pack labelling: Unhealthy changes in the global food system. Glob Heart 2020;15:70.
- Mandle J, Tugendhaft A, Michalow J, Hofman K. Nutrition labelling: A review of research on consumer and industry response in the global South. Glob Health Action 2015;8:25912.
- Singh M, Iyer U, Chandorkar S. Nutrition labeling compliance of branded processed packaged foods with indian food laws (FSSAI, 2011 regulations). Int J Food Nutr Sci 2013;2:14-9.
- Motuzka I, Eugster E. Front-of-pack labelling of food products: International practices and perspectives. Commod Mark 2022;44:78-89.
- State of play of WHO guidance on Front-of-the-Pack labelling [Internet].
   Who.int. Available from: https://www.who.int/news/item/27-09-2021-state-of-play-of-who-guidance-on-front-of-the-pack-labelling. [Last accessed on 2023 Dec 06].
- 16. AMA advocates for transparency in food labeling and packaging. American Medical Association. Available from: https://www.ama-assn. org/press-center/press-releases/ama-advocates-transparency-food-labeling-and-packaging. [Last accessed on 2023 Dec 06].