# A review of front-of-pack nutrition labelling in Southeast Asia: Industry interference, lessons learned, and future directions

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## Summary

Front-of-pack nutrition labelling is an evidence-based nutrition intervention that is recommended by the World Health Organization and other health agencies as an effective non-communicable disease prevention strategy. To date, the types of front-of-pack labels that have been identified as being most effective have yet to be implemented in Southeast Asia. This has been partly attributed to extensive industry interference in nutrition policy development and implementation. This paper outlines the current state of food labelling policy in the region, describes observed industry interference tactics, and provides recommendations for how governments in Southeast Asia can address this interference to deliver best-practice nutrition labelling to improve diets at the population level. The experiences of four focal countries – Malaysia, Thailand, the Philippines, and Viet Nam – are highlighted to provide insights into the range of industry tactics that are serving to prevent optimal food labelling policies from being developed and implemented.

**Funding** This research was supported by the United Kingdom Global Better Health Programme, which is managed by the United Kingdom Foreign, Commonwealth and Development Office and supported by PricewaterhouseCoopers in Southeast Asia.

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Keywords: Nutrition; Labelling; Food industry; Conflicts of interest

# Introduction

The world is witnessing a nutrition transition to diets comprising greater proportions of processed foods that are high in salt, sugar, and saturated and trans fat.<sup>1</sup> This shift has accelerated over recent decades in high-income countries, and is now also evident in lower- and middle-income countries across Southeast Asia.<sup>2</sup> A corresponding increase in the prevalence of nutrition-related non-communicable diseases (NCDs) has occurred throughout the region, resulting in calls for the implementation of evidence-based nutrition policies.<sup>3,4</sup>

The World Health Organization (WHO) recommends governments implement front-of-pack nutrition

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involves the food industry supplying nutrition information on the front of packages in a format that is readily understood by consumers.<sup>6</sup> Access to such information is described by the United Nations as a fundamental human right due to the strong relationship between diet and health and the considerable potential of frontof-pack labelling to assist consumers make healthy food decisions in increasingly obesogenic environments.<sup>7</sup>

labelling as an NCD-prevention 'best buy'.5 This

This paper synthesises academic research, government and non-government agency reports, and recent news articles from the region to analyse the barriers and facilitators relevant to front-of-pack labelling policy development and implementation in Southeast Asia, with a particular focus on industry interference in policy processes. It is structured as follows: First, the nature and benefits of front-of-pack nutrition labels (FoPLs) The Lancet Regional Health - Southeast Asia 2022;3: 100017 https://doi.org/10.1016/j. lansea.2022.05.006

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#### **Research in context**

#### Evidence before this study

Southeast Asia is experiencing a nutrition transition characterised by increasing availability of ultra-processed foods that contribute to obesogenic environments. Effective front-of-pack nutrition labelling provides consumers with at-a-glance interpretive information to facilitate healthy food choices and incentivise reformulation by manufacturers. While this form of nutrition labelling is strongly recommended by international health agencies, it has yet to be implemented throughout Southeast Asia.

#### Added value of this study

This analysis of academic literature, government and health agency reports, and media articles provides insights into the nature and extent of industry involvement in front-of-pack labelling policies in Southeast Asia. Industry interference has resulted in the substantial delay of effective front-of-pack labelling development and implementation. Countries in the region are introducing weak labelling systems coupled with inadequate monitoring and enforcement. This is preventing consumers from benefiting from clear and accessible information to guide their food purchase decisions, leaving them vulnerable to nutrition-related diseases.

#### Implications of all the available evidence

Potential strategies for overcoming adverse industry influence in Southeast Asia include (i) implementing unambiguous and stringent conflict of interest policies, (ii) building legal capacity to defend against threats and lawsuits brought by industry, (iii) strengthening civil society organisations in individual countries and the region to shore up the allies needed to counteract industry interference, and (iv) following the evidence base when selecting a front-of-pack label to implement.

and the current state of FoPL implementation globally are described. Second, the ways in which the food industry has interfered with FoPL policy are outlined, accompanied by recommendations to assist governments overcome this interference. Third, the FoPL policy experiences of four countries (Malaysia, Thailand, the Philippines, and Viet Nam) are discussed to provide examples of how industry interference has manifest in the region. Finally, these experiences are compared against the suite of tactics and policy responses that have been identified in the literature to provide insights into how governments in the Southeast Asian region can establish processes to minimise industry interference and optimise health benefits for their populations.

# Front-of pack nutrition labelling

The primary aim of FoPLs is to provide consumers with salient, readily understood nutrition information on

food products to enable them to make healthier food choices, with a secondary aim being to stimulate reformulation among food producers to improve the quality of the food supply.<sup>8</sup> The increasing prevalence of highly processed foods makes it difficult for consumers to assess the nutritional quality of products that are available in the marketplace. Nutrition information panel labels that often appear on the back or side of food packages have been found to be too complex for many consumers to understand, and the proliferation of nutrition and health claims exacerbates consumer confusion.9 By comparison, effective FoPLs are based on nutrient profiling systems that facilitate the provision of simplified information that enables consumers to assess products' nutritional quality at a glance.7 Evidence is accruing that the nutrient profiling systems that underlie welldesigned FoPLs are aligned with disease risk reduction at the population level,<sup>10,11</sup> highlighting the important role FoPLs can play in addressing diet-related NCDs. However, FoPLs constitute a 'nudge' strategy and are more impactful as part of comprehensive nutrition strategies.8

Initially introduced in the late 1980s,<sup>8</sup> FoPLs have now been implemented in more than 30 jurisdictions in a variety of formats.<sup>6</sup> A substantial and rapidly growing body of evidence demonstrates that the most effective FoPL systems are mandatory and feature an interpretive design.<sup>4,12,13</sup> Interpretive labels provide an evaluation of the nutritional quality of foods, thereby reducing cognitive effort and making the information accessible to those with lower health literacy.<sup>9</sup>

There are three main categories of interpretive FoPLs. The first encompasses endorsement logos, such as the Nordic Keyhole logo that has been implemented in Northern Europe and the Healthier Choice logo in Singapore. While these labels are more acceptable to the food industry because they have a positive focus,<sup>14</sup> they have not delivered the expected public health benefits, resulting in the need for other forms of interpretive labelling that can also assist consumers identify unhealthy options.<sup>15</sup> The second category of interpretive FoPLs is warning labels, such as those implemented in Chile and Mexico. These labels highlight specific unhealthy characteristics of products to assist consumers identify those that should not be consumed regularly. The third category of labels is spectrum labels, which aim to advise consumers of the relative healthiness of food products across the full range of nutritional quality. Examples include the Nutri-Score that is being implemented in some European countries, the Multiple Traffic Lights in place in the United Kingdom, and the Health Star Rating system that operates in Australia and New Zealand.

By comparison, reductive (non-interpretive) FoPLs merely repeat elements of the nutrition information panel located on the back of food product packaging.<sup>16</sup> Examples of this type of label include the Reference Intakes label used in the European Union and the Guideline Daily Amount label (GDA) in place in Thailand.

Various health agencies have provided clear guidance for developing FoPLs,<sup>8,9,12,13,17</sup> yet implementation of recommended FoPLs across Southeast Asia remains limited. Factors contributing to suboptimal uptake include a lack of baseline data on the nutrient composition of key foods, dietary patterns, existing labelling practices, and consumer knowledge and attitudes; insufficient capacity to monitor changes in the food supply over time and assess compliance with labelling regulations; and extensive industry interference.<sup>2,4,7,18-20</sup> This paper focuses on the latter factor to provide insights into ways interference can be anticipated and managed to optimise governments' ability to develop and implement effective food labelling policies. Importantly, this paper does not endorse the use of any particular style of interpretive FoPL as this decision should be informed by local research when possible, along with regional and global evidence, and in consideration of each country's specific objectives for developing a FoPL policy.

## Industry interference

Engagement with the food industry is a complex issue due to the essentialness of food and the highly differentiated nature of the industry.<sup>21</sup> Industry representatives range from individual farmers to member associations and multinational companies with revenues larger than the gross domestic product of some countries. The power imbalance within the sector favours producers of unhealthy foods, meaning that public health goals are best served by quarantining nutrition policy development away from the food industry and reserving industry engagement for specific purposes during the implementation planning phase where private sector expertise is of most value.<sup>12,17</sup>

Across harmful product sectors globally, a consistent 'playbook' of strategies for delaying, diluting, and derailing health policies has been identified.<sup>6,22,23</sup> Originating with the tobacco industry, this playbook has since been applied by other sectors including the alcohol, gambling, and unhealthy food industries, and relates primarily to large, multinational corporations marketing ultra-processed foods and the peak bodies/associations representing their interests. The playbook involves organisations or their representative associations framing themselves in particular ways to achieve their objectives. These positioning activities can be categorised as follows:

## 1. We're your friends

Strategies in this category include those relating to 'corporate washing' through investments in corporate social responsibility (CSR) activities.<sup>1,6,19,20,24,25</sup> These activities often involve funding community outreach programs, such as those featuring direct food provision, physical activity programs, consumer education, and education programs for health professionals. Other forms of 'friendliness' are evident in political donations, bribery, and the promise of 'revolving door' opportunities whereby government officials land well-paid positions in industry at a later point in time.<sup>21,22,25–27</sup> In addition, the industry often positions itself as a key economic asset delivering income and jobs that represent tangible outcomes of the positive relationship between the sector and the country.<sup>6,12,28</sup>

2. We're knowledgeable and can meaningfully assist with the process

Harmful industries often position themselves as 'part of the solution' to garner a seat at the policy-making table.<sup>6,25</sup> This includes by shaping the evidence base through in-house research, funding other entities to conduct research, and contesting the findings of independent research.<sup>1,12,19,20,22,24,26,27,29,30</sup> A related approach is to undertake research and development activities to introduce 'safer' products that ostensibly reduce the need for regulation, such as food products with less salt, sugar, or fat.22 In the context of nutrition policy, the industry has been highly active in developing, implementing, and promoting alternative FoPLs, nutrient profiling systems, and other forms of regulation that do not reflect the available evidence on best-practices, a strategy known as policy substitution.1,2,12,25,28

### 3. We like to play fair

By invoking fairness principles, harmful industries position themselves as being entitled to favourable treatment. A common manifestation of this approach is the argument that the aetiology of obesity is so complex that individual products cannot be held accountable and that there is no such thing as a 'bad food'.<sup>22</sup> According to this view, regulation constitutes an unreasonable imposition on organisations' commercial viability.<sup>26,30</sup> Instead, industry promotes freedom of choice and individual responsibility to direct the focus away from their products and onto consumers.<sup>12,22,26,30</sup> On some occasions industry representatives have claimed to be the victims of bullying during the introduction of food labelling regulations.<sup>21,26</sup> Finally, industry representatives may point to the minimal recommendations of entities such as the Codex Alimentarius Commission (a joint standard-setting body of the WHO and the Food and Agriculture Organization (FAO) that has substantial engagement with the food industry) and emphasise their alignment with these standard setting agencies to contend that they are playing by the rules.<sup>20</sup>

# 4. We're allied

There are various ways by which the industry establishes and utilises connections to reduce governments' appetite for developing and implementing strong nutrition policy. Techniques include a 'divide and conquer' approach that involves seeking support from government departments responsible for trade and investment to overcome initiatives planned by health departments.<sup>26</sup> Front groups are created and supported to advocate in the industry's interests while appearing to represent independent entities.<sup>1,20,22</sup>

## 5. We're a dangerous enemy

Finally, if the friendly, relationship-based approaches do not work, aggressive tactics have been employed to encourage the reconsideration of planned regulatory interventions. This can involve threatening litigation, moving production facilities elsewhere, or increasing food prices;<sup>1,6,7,12,29</sup> criticising governments as presiding over 'nanny states',<sup>12,22,30</sup> and attempting to tarnish the reputations of public officials and public health organisations.<sup>6</sup>

These frames are communicated through a range of activities that vary according to their transparency. The more visible activities include participating in policy consultation processes through written submissions and/or roundtable discussions and running media campaigns to portray the business or industry as social-minded.<sup>1,21</sup> Less visible processes include intensively lobbying policy makers and multilateral organisations<sup>1,2,6,12,19,26</sup> and co-opting policy makers through incentives.<sup>6,26</sup>

#### Avoiding industry interference

It can be difficult for governments to avoid harmful industry interference due to its many shapes and forms and the significant resources large companies and business associations can dedicate to optimising their engagement in policy matters.<sup>1,21,22</sup> In an attempt to guide governments, the WHO developed a Draft Approach for the Prevention and Management of Conflicts of Interest in the Policy Development and Implementation of Nutrition Programmes at Country Level.31 The document prompts policy makers to consider whether actors' core activities and values are compatible with the applicable public health goal. In the case of the ultra-processed food industry, this is inherently problematic given companies' obligation to maximise shareholder value renders them unable to voluntarily reduce their marketing of unhealthy foods and the resulting need to introduce mandatory regulations to compel them to align with public health interests.32

In the absence of definitive evidence of effective means of insulating health policies from the adverse effects of interference by harmful industries, various approaches have been recommended to reduce harms. As outlined below, these approaches primarily focus on minimising and managing conflicts of interest and facilitating the involvement of civil society to assist in counteracting industry influence.

I. Establishing and enforcing clear conflict of interest guidelines using transparent processes

Setting explicit procedural standards for participants involved in policy development and ensuring all parties are aware of their obligations are critical elements of safeguards against conflicts of interest.32 Examples include: clear directives relating to government officials being prohibited from accepting gifts or other incentives from industry actors,19 controls on political donations,<sup>29</sup> limiting the types of stakeholder groups that can participate in policy working groups,17,23,29 restrictions on the types of interactions that can occur between government and industry,<sup>18,27,29,32</sup> and specifying mandatory minimum time periods before former government staff can take up positions in industries they were previously entrusted to regulate.<sup>29</sup> Enforcement requires effective monitoring to assess compliance, which in turn requires transparency from governments at all levels.<sup>6,32</sup> Efforts are needed to achieve transparency across government departments to prevent industry from invoking support from trade-focused government entities that advocate on their behalf against health departments.<sup>26,33</sup>

Transparency includes mandatory registration of lobbyists, mandatory disclosure of emails and the content of telephone conversations between government and industry, and protections for whistle blowers.<sup>19,23,29,32</sup> Monitoring activities need to be properly resourced to facilitate appropriate enforcement of procedural standards.<sup>1,7</sup>

## 2. Ensuring strong civil society representation

Engaged populations and robust civil society organisations are important for keeping governments and industries accountable.<sup>1,12,17,24,3°</sup> It is therefore important to strengthen the ability of civil society representatives to participate in policy processes.<sup>19</sup> The media can play an important role in generating awareness about the importance of diet and the public health implications of industry tactics that interfere with nutrition policy and increase sales of unhealthy foods.<sup>29,34</sup> Such messages are most effective when framed in a manner that resonates with the public and delivers a compelling call to action.<sup>6,3°</sup> It is also important to ensure academics are aware of the need to stay independent from harmful industries and disclose all potential conflicts of interest in their outputs.<sup>19,23,29</sup>

# **Focal countries**

From the limited research available, it is clear that the harmful industries' playbook strategies are being brought to bear during the deployment of nutrition policies in low- and middle-income countries.<sup>1,26</sup> This includes interference in FoPL policies in Southeast Asia,<sup>6</sup> which is evident from the notable slowness with which countries from this region are updating their food labelling regulations - even to meet the minimum guidelines provided by Codex - and the lack of alignment between implemented FoPLs and the substantial body of evidence on effective FoPL formats and regulatory frameworks.<sup>4,17,35</sup> Using the available literature and supplemented by relevant local press coverage, the status of FoPL policy in four Southeast Asian countries is outlined below to illustrate the impact of industry activities. The focal countries, Malaysia, Thailand, the Philippines, and Viet Nam, were selected due to their varied experiences with (i) FoPL development and implementation and (ii) industry involvement in these processes. Search terms included combinations of the following: 'food', 'label', 'logo', 'front of pack', 'industry', 'policy', 'Asia', and the names of the focal countries. Table I summarises the FoPL status of each country, with backof-pack labelling also included due to its importance for generating data that can inform FoPLs.

#### Malaysia

Two voluntary front-of-pack labelling systems are currently in place in Malaysia - an energy-only GDA label and the Healthier Choice Logo. The GDA label can be applied to all packaged food products except special purpose foods and infant formula.<sup>14</sup> The stated aims of the Healthier Choices Logo are to guide consumers towards healthier options and encourage producers to reformulate their products to achieve eligibility to display the logo.<sup>36</sup> Concerns have been raised that there is confusion among the general public that the Healthier Choices Logo denotes healthy, rather than healthier, product alternatives.<sup>4</sup> These two FoPL systems co-exist despite WHO guidance that countries should implement a single FoPL system to optimise impact.<sup>8</sup>

Recent analyses describe how industry interference has affected FoPL policies in Malaysia, resulting in slow

implementation processes and continued reliance on suboptimal FoPL systems.<sup>2,37</sup> While the Government was in the process of introducing back-of-pack labelling, interference was evident in the form of lobbying and recommendations for policy substitution, resulting in a drawn-out policy development period. This greatly taxed the limited resources of advocacy groups, for whom competing with the well-resourced industry became unsustainable. Industry's arguments over packaging waste resulting from label changes were used to delay final implementation once the policy had been approved.

In the apparent absence of planned FoPL improvements in Malaysia, the food industry appears to be shoring up the existing arrangements and distracting policy makers by garnering news coverage on how to read existing nutrition information present on labels,<sup>38</sup> making arguments for nutrition claims that are not currently permitted (e.g., glycaemic index claims),39 donating and promoting food products under the guise of performing a community service during Covid,<sup>40</sup> and drawing attention to the importance of physical activity.40 Throughout these news articles, company representatives are cited giving nutrition advice, ostensibly in an effort to provide a public service. Such approaches can be interpreted as efforts to enhance the industry's reputation, maintain the status quo, and discourage future changes in labelling regulation.

#### Thailand

Similar to Malaysia, Thailand has two FoPLs in place a GDA FoPL and the Healthier Choice Logo. Key differences are that the Thai GDA is more comprehensive as it includes sugar, fat, sodium, and energy, and it is mandatory for specified product categories. These categories were originally just those consumed regularly by children, but have now been expanded to encompass a broader range of commonly consumed packaged products.4I

The selection of a monochrome GDA label occurred despite the Thai Ministry of Public Health presenting a proposal for the introduction of a Multiple Traffic Light FoPL, which was supported by health agencies and civil society organisations (some of which continue to

	Malaysia	Thailand	The Philippines	Viet Nam
Back of pack labelling regulation	$\checkmark$	$\checkmark$	$\checkmark$	х
Front-of-pack labelling regulation	$\checkmark$	$\checkmark$	$\checkmark$	Х
Mandatory interpretive	-	-	-	-
Mandatory reductive	-	partial	-	-
Voluntary interpretive	logo	logo	logo	-
Voluntary reductive	partial	-	partial	-

Note: ✓ means regulation exists; X means no regulation exists

campaign for Multiple Traffic Lights<sup>42,43</sup>). This proposal was informed by research conducted with Thai consumers, which found that a Multiple Traffic Light FoPL was best understood from a range of tested FoPLs.<sup>44</sup> Resistance from the Federation of Thai Industries resulted in the GDA being introduced instead.<sup>45</sup> Researchers identified an extensive range of strategies employed by the food industry to block the introduction of an interpretive label in Thailand.<sup>18,19</sup> These included building close ties with government officials, lobbying to promote deregulation, arguing excessive cost imposition on companies, making payments to political parties and policy makers, and bringing a legal challenge in the World Trade Organization Court.

Research indicates that many Thai consumers are not able to understand and use the GDA.<sup>46</sup> In recent news articles, representatives from food companies have been quoted providing nutrition label reading advice, which could be interpreted as an effort to maintain the status quo and prevent the introduction of more effective alternatives.<sup>47,48</sup> In other instances, university researchers appear in news articles to encourage consumers to read and use existing labels.<sup>49</sup>

## The Philippines

Consistent with the approach in Malaysia, an energyonly, voluntary GDA FoPL has been implemented in the Philippines. The label can be applied to all packaged foods and beverage categories.<sup>4,14</sup> With the aim of addressing malnutrition in the country, a voluntary label identifying foods fortified with iodine, iron, or vitamin A is also in place – the Sangkap Pinoy Seal Program.<sup>50</sup>

There is little publicly available evidence of industry interference in nutrition labelling policy in the Philippines, which is likely to be at least partly due to the lack of recent changes in labelling regulation, minimising attention to the issue. An exception is the banning of health claims relating to trans fats,<sup>51,52</sup> an effort involving strong civil society mobilisation. This initiative is related to the requirement for these fats to be phased out of the food supply by 2023. This is considered to be a favourable outcome for many industry members because it will protect the market from being treated as a dumping ground for products containing trans fats that cannot be sold in other jurisdictions around the world.<sup>51</sup>

The lack of progress in introducing more comprehensive front-of-pack labelling is notable in the context of a joint statement being issued a year ago by the Philippines Department of Health, National Nutritional Council, WHO, FAO, and UNICEF calling for enhanced front-of-pack labelling on commercial foods consumed by children to address burgeoning rates of childhood obesity.<sup>53</sup> This initiative appears to be in the early planning phases, and insights into the way the process may play out may be gleaned from related health policy areas. There are reports of policy makers experiencing substantial obstruction and coercion from the food industry when developing policies to restrict breast milk substitute marketing and the sale of unhealthy foods in schools,<sup>54,55</sup> and graphic health warnings on tobacco products were delayed by three decades due to intense industry resistance.<sup>33</sup> However, there are indications of systems in place to support progressive nutrition policy where it is considered beneficial by government, including the recent policy action regarding trans fats, and the Philippines' role as an early leader in Southeast Asia (along with Thailand) in adopting a sweetened beverage tax.<sup>56</sup>

## Viet Nam

Viet Nam differs from the other focal countries in that back-of-pack nutrition information labelling has yet to be implemented. Current food labelling requirements are limited to listing the ingredients, providing production/expiry dates, and showing warning information if relevant.<sup>57</sup> A decree to improve nutrition labelling through mandatory back-of-pack labelling has been passed, but discussions continue on several key issues in the draft implementation guidance (e.g., the specific nutrients to be included in the nutrition information panel and the length of time available to industry to achieve compliance). A decree on iodine fortification adopted in 2016 has yet to be implemented,<sup>58</sup> illustrating the extent to which processes can be delayed due to different stakeholders presenting opposing arguments. The Vietnamese government is also in the early stages of considering the introduction of a voluntary FoPL system that will identify healthier foods according to nutrient thresholds and apply to a specified range of product categories.59,6

Along with constraints such as a lack of capacity to undertake nutrient testing and weak consumer literacy hampering the introduction of nutrition labelling in Viet Nam,<sup>4</sup> food industry organisations have been vocal in their criticism of the government's labelling proposals. They have attended Ministry of Health consultation events where they have expressed concerns about economic implications,<sup>6</sup> and garnered media attention with claims that the proposed voluntary FoPL would be "inappropriate and possibly misleading"<sup>61</sup> and have the potential to "endanger the health of consumers".<sup>62</sup> The purported negative outcomes of labelling advancements have been described as: "revenue of industries may decrease, workers lose their jobs, and the state loses tax revenue".63 Remarkably, concerns have been expressed that food labelling could result in people eating too much healthy food.<sup>64</sup> The policy development process has been accused in the media of failing to take into account the specific needs of the Vietnamese people, for lacking a scientific basis, and involving inadequate public consultation.<sup>61</sup>

In an example of policy substitution, the Vietnam Beer, Wine and Beverage Association (VBA) was quoted across multiple media outlets as recommending that instead of attempting to introduce a FoPL, the government should focus on encouraging more physical activity and improving the quality of the country's nutrition guidance in the form of the national Recommended Daily Intakes and Upper Limits issued in 2014.<sup>62</sup> It was suggested this guidance could be enhanced by providing more specific information for varying population subgroups (e.g., segmentation by age and sex). Strategically located at the top of a news article covering this view was a link to another story titled "Nutifood (a large dairy company) donates 40,000 nutritional products worth 1.3 billion VND to Dong Nai Department of Health".

## Next steps

The continued reliance on the least effective FoPL formats and regulatory systems in Southeast Asia highlights the need for governments in the region to be assisted to overcome the pressures of industry interference. Interactions with the industry appear to be primarily in line with the 'we're your friends' and 'we can help' interference categories, potentially preventing governments from being adequately on guard. Appropriate mechanisms need to be introduced to keep the private sector at arm's length to protect public health.<sup>18</sup> Along with the human rights issues associated with the availability of a healthy food supply,7 the economic benefits associated with improved population health from effective food labelling constitute an important rationale for minimising industry involvement in policy development.3°

The international literature provides insights into ways Southeast Asian governments could strengthen their systems to protect against undue industry influence. First, unambiguous and stringent conflict of interest policies need to be developed and implemented across the whole of government to address industry involvement in nutrition policy. Recommended strategies for conflict of interest protocols include: communicating an explicit definition of what constitutes a conflict; mandatory registration of lobbyists; mandatory disclosure of political donations with limits applied; mandatory disclosure of email and telephone communications between government and industry; banning government officials from receiving incentives from the food industry; excluding industry representatives from FoPL development committees; prohibiting partnering with companies in CSR activities; setting minimum waiting periods before government officials can work in organisations regulated by the government (and vice versa); and providing clear instructions to government staff about permitted forms of interactions with

industry representatives.<sup>12,17,19,23,29,32,65</sup> Ultimately, a comprehensive international policy along the lines of the WHO's Framework Convention on Tobacco Control would be of benefit to guide countries in managing interactions with the food industry.<sup>27,29</sup>

A second action area to address industry interference is to strengthen legal frameworks and capacity to defend against threats and lawsuits brought by industry, and to enforce penalties for violations of labelling laws.<sup>13,65</sup> Low- and middle-income countries can benefit from regional and global information-sharing and capacitybuilding efforts.<sup>32,33</sup> Third, strengthening civil society organisations in individual countries and the region can assist in generating the allies needed to counteract industry interference.<sup>12,19</sup> Mobilised civil society organisations can communicate the message that healthy diets are important and provide support for health ministries (and inter-ministerial committees) in their attempts to introduce food labelling regulations.17 Awareness-raising among journalists can assist in generating media coverage that brings a public health perspective to issues relating to food labelling.<sup>29,34</sup>

Finally, when developing FoPL policy, governments need to follow the evidence, not the industry's preferences. A substantial evidence base exists on the most effective FoPLs, and guidance resources are available from international agencies to assist countries generate local evidence when possible and identify and implement FoPLs that are most appropriate for their national contexts.<sup>8,12,13,17</sup> Evidence emanating from researchers and institutions funded by the food industry should be treated with a high degree of caution.<sup>19</sup>

In terms of study limitations, this overview of FoPL policies in Southeast Asia and the role of industry involvement in policy development is based on publicly available information, and thus likely represents a substantial underestimation of the extent to which industry interference is occurring. Similarly, policy discussions within government that have not been reported in the literature or media could not be captured, and it is possible that meaningful FoPL policy progress is underway in some countries. There is therefore the need to obtain additional insights by updating and extending the work of previous research that has involved accessing the views and experiences of key stakeholders in the region.<sup>2,18,19</sup>

In conclusion, current food labelling policies in Southeast Asia are preventing consumers from benefiting from clear and accessible information to guide their purchase decisions, leaving them vulnerable to nutrition-related diseases. Consumers across the region would benefit from efforts to address apparent high levels of industry interference that are resulting in suboptimal nutrition policy implementation, including in relation to front-of-pack labelling.

#### Contributors

Conceptualisation: SP, PK, IS, SCL, KB; Data sourcing: SP, DC, BM, DV, AP; Analysis: SP, DC, BM; Funding acquisition: PK, SP; Methodology: SP, PK; Project administration: PK; Writing original draft: SP; Writing – review & editing: All authors

### **Declaration of interests**

The United Kingdom Foreign, Commonwealth and Development Office commissioned The George Institute for Global Health to undertake the body of work on food labelling in Southeast Asia of which manuscript preparation was one component. SP, DC, and BM are employed by The George Institute. PK is employed by the Better Health Program that is supported by the UK Foreign Commonwealth and Development Office through PricewaterhouseCoopers. Funding for KB's time was provided by Bloomberg Philanthropies to the Global Health Advocacy Incubator/Campaign for Tobacco-Free Kids.

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