



Policy Brief

## Front-of-Pack Labelling: Empowering Indian Consumers to Make Healthier Food Choices



**Many pre-packaged foods available in the market are processed with high levels of added sugars, salt, and/or saturated fats, which are associated with increased risk of many non-communicable diseases (NCDs). We urgently need to adopt a front-of-pack labelling policy to help consumers make healthier food choices and reduce the country's NCD burden.**

### Background

Front-of-pack labels (FoPLs) are an important tool to assist consumers in making healthier food choices. A FoPL's purpose is to inform consumers about the relative healthiness of products and indicate excessive energy, added sugars, saturated fats, and/or salt, which are associated with risk for NCDs, including heart disease, high blood pressure, diabetes mellitus, and overweight and obesity. Consumers are most likely to be influenced by FoPLs when they are buying a product for the first time, shopping for children, and trying to reduce their intake of certain nutrients or their weight. However, the effectiveness of a FoPL in the market will depend on consumer education as shoppers may be motivated by price, brand loyalty, taste, and habitual purchasing as well as the healthiness of the product. In the backdrop of growing obesity, malnutrition, increasing NCD burden, morbidity, and mortality, the cost savings from reduced need for expensive medical treatment and averting deaths far outweigh the costs associated with modification of food product labels.

### Study on the Acceptability and Utility of FoPLs

There has been little prior research conducted in India to inform the development of FoPLs that are effective in communicating food healthiness to consumers and guiding their choices towards healthier products. Further, food industry concerns and a lack of clarity on the type of FoPL that would be most acceptable, comprehensible, and effective have delayed the implementation of a standardized FoPL in India thus far. In this context, WHO India in partnership with The George Institute for Global Health undertook a study<sup>1</sup> in socioeconomically diverse samples of participants in urban, rural, and urban slum areas in

North (Delhi, Faridabad, and Ghaziabad) and South India (Siddipet and Hyderabad) to examine the acceptability and utility of 5 FoPLs: a draft FSSAI FoPL modified as part of this study, Health Star Rating (HSR), Multiple Traffic Light (MTL), Nutri-Score, and Israeli Warning Label.

Stakeholder meetings with consumer organisations, government bodies as well as food industry stakeholders were also organised to present the research findings and seek inputs on implementation.

### Policy Recommendations

#### FoPL design features

- Draw the attention of the consumers by incorporating bright colours, big (easily readable) font sizes, and pictorial representation using images and symbols for greater engagement and comprehension
- Place in a clearly visible location on the pack (e.g., close to the name/logo)
- Have a standardized format for ease of implementation and consistency across products

*If the labels allow you to compare across the different brands, if there are three different brands and they have the same label, and one says "low", the other one says "medium" then it helps help you to compare across the products.\**

*The label should be more conspicuous. It would be good to enlarge the font and make it eye catching. If it's a label that is obvious then I would look at it.\**

1. Assessing effectiveness of front of pack labels for processed food products: A pilot-testing exercise; Sponsor: WHO

## FoPL content

- Present textual information in local languages (Hindi and English, and regional language translations too, as feasible)
- Present information on 'salt' (rather than 'sodium') for clarity among consumers
- Present information on 'total sugar' instead of 'added sugar'
- Include nutrition rating in terms of 'high', 'medium', and 'low' instead of using percentages to indicate the content amount

*Percentage is not something that is easy to comprehend for a layman. It needs to be accessible... something that is easily understandable rather than using numbers or percentages.\**

*They should write high and low because sometimes we also can't understand while choosing a product.\**

*I do not understand what sodium means. They should have mentioned salt over here. It is incomplete without salt. I think salt should be there.\**

## Regulation

- Legally mandated and enforced, rather than voluntary for food manufacturers

*It should be compulsory. The government should take the responsibility and pass the orders.\**

*If labels are not mandatory and standardised, it will be a mess.\**

## Implementation

- Preceded and accompanied by a robust nutrition literacy campaign to raise awareness of the importance of food for health and the nutrients to limit in the diet
- Launched and promoted with guidance on the use of the FoPL being implemented

*We also don't know how much is good for us. There should be a list of items and quantities like how much we should take and what we should not take. They should tell how much percentage we can use.\**

*The government should do a campaign. That this is the logo. It shows green so this product is good. There should be some informational campaign (jagrukta abhiyan) then we will understand.\**

\*Focus group participants' statements

## Conclusion

Recognising that no single action will be sufficient to address India's burden of NCDs, policymakers should support the implementation of an effective FoPL as part of a comprehensive suite of measures to promote healthier diets. To maximize public health impact and facilitate the optimal use of an FoPL, the FoPL system must be a part of a broader NCD prevention and nutrition promotion strategy, supported by a public awareness campaign to enable the use of the label to make healthier choices. It is important to note that whichever FoPL the health authorities choose to implement, any evidence-

based FoPL system's acceptance and enforcement is a welcome move to assist consumers to take control of their lives and make informed food purchase decisions for healthier outcomes.

The adoption and implementation of an effective, comprehensible, and acceptable FoPL, supported by a robust campaign to enhance nutrition literacy in the population, can contribute significantly to the prevention and management of NCDs through positively influencing the dietary habits of consumers and assisting them in making healthier food choices.

To find out more about the Front-of-Pack Labelling study

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