

Press release

Warning Labels -the best and Health Star Rating (HSR)- the worst, on unhealthy food products....says a new study from IIPS Mumbai.

New Delhi. 16th September 2022. The Nutrition Advocacy in Public Interest (NAPi) organised a presentation of a newly published peer reviewed study in India on the front of pack labeling. The [study](#) titled “Front-of-Package Labels on Unhealthy Packaged Foods in India: Evidence from a Randomized Field Experiment” was presented by one of the lead authors Prof. SK Singh and Barry Popkin <https://www.mdpi.com/2072-6643/14/15/3128> (*Nutrients* **2022**, *14*(15), 3128; <https://www.mdpi.com/2072-6643/14/15/3128>)

The objective was to test whether FOPLs helped Indian consumers identify “high-in” nutrients of concern in the packaged foods and reduce intentions to purchase them. This assumes importance, as the Food Safety Authority of India (FSSAI) [continues to rely](#) on the report of the IIM Ahmedabad, and insists on providing Health Star Rating (HSR) to all unhealthy food products, while developing an algorithm, which would help in generating information about the nutritional value of the product.

Several public health experts have [critiqued](#) the IIM report for its methods and flawed interpretation. At the same time FSSAI had [briefed](#) IIM on September 09, 2021 saying that FSSAI plans to introduce a FOPL system that would be effective in “..*informing consumers about healthy food choices in terms of saturated fat, total sugar, salt/sodium, energy content, and probably other positive nutrients.*” Dr. Arun Gupta Convener of NAPi said, “If a researcher has to deal with ‘positive nutrients’ for FOPL, either HSR or Nutri-Score will come up. The IIM report recommending HSR, suggests a bias”

Key findings presented by Professor SK Singh included:

1. Relative to the control group, each FOPL led to an increase in the percentage of participants **who correctly identified all products** with high levels of nutrient(s) of concern, which are total sugar, salt or saturated fats. The biggest differences observed were for the warning label (60.8%) followed by the traffic light label (54.8%), GDA label (55.0%) and HSR label (45.0%).(Fig.)
2. Relative to the control, warning labels led to a small but statistically significant reduction in participants’ intentions to purchase unhealthy products.
3. Other outcomes: Warning labels performed best on perceived message effectiveness, a scale that reflects both message perceptions (judgments about how well the message will lead to persuasion) and is predictive of behavioral change.
4. Other outcomes: Warning labels also performed best identifying products as unhealthy, making participants concerned about health consequences and being true. The HSR performed worse than all other FOPL types tested.

The authors concluded, *“This randomized field experiment found that, relative to a control label, all FOPLs helped consumers to identify unhealthy packaged products high in sugar, sodium, and saturated fat. The pattern of results suggested that the warning label is the optimal FOPL to achieve the goal of informing consumers about packaged foods and drinks high in nutrients of concern...”*

“It is high time that our country should have a clearly defined regulatory objective. This will help in identifying the kind of FOPL system that fits the intended purpose. If our regulatory objective of adopting an FOPL system is to help consumers to identify unhealthy products correctly, quickly, and easily, the results of the study may help the policy makers in further discussions on this issue. The summary score systems (High Star Ratings) are not of much use to the consumers in identifying the food items with excessive amounts of specific critical nutrients (e.g., sugars, fats, and sodium)”, said **Dr. Pankaj Bhardwaj**, MD, *Academic Head, School of Public Health & Additional Professor Community & Family Medicine & Vice Dean (Research) AIIMS Jodhpur.*

There is enough scientific [evidence](#) that warning labels work better than HSR. If a food product receives ½ to 5 ‘Stars’ it is misleading and may in fact increase consumption of unhealthy food products. Evidence suggests [HSR can be manipulated](#) as well to get a higher number of stars.

India is facing a huge problem of increasing obesity both in men and women as well as the burden of non-communicable diseases such as Heart disease, diabetes and cancer. More than 5.8 million Indians die every year from Non-Communicable Diseases (NCDs) such as cancer, diabetes, uncontrolled hypertension and cardiovascular diseases, which is about 2/3rd of total deaths. According to the National Family Health Survey-5, nearly 1 in 4 adults and 1 in 20 children are classified as overweight or obese, and it is rapidly increasing. At the same time, India faces a major double burden of malnutrition, as stunting, underweight and wasting remain high, more so among the poor. One of the major factors underlying is rapidly increasing consumption of ultra-processed food/beverage products.

Said **Dr. Pfoze Member of Parliament (Lok Sabha)**, “It is quite important for the food safety authority to take a decision that protects public health as it’s mandate is to ensure safe food. The unhealthy food products can only be curbed in consumption if the consumer is warned about it. The scientific evidence presented today is convincing that warning labels have the biggest impact”

Prof. K Srinath Reddy, President of Public Health Foundation of India (PHFI) said “People have a right to know about harmful levels of salt, sugar and unhealthy fats in the foods that they purchase, to help them decide how to protect personal and family health based on that information. Health Warnings serve that purpose best. Health Star Ratings claim to provide an overall assessment of the nutrient content but [can mask harmful levels of specific nutrients](#) when multiple additives are summed up. Evidence from the IIPS study clearly supports the use of Warning Labels for effective risk communication.”

The Consumer Protection Act 2019 upholds the right to safe food. The Hon’ble Supreme Court has upheld that any food article, which is hazardous or injurious to public health, is a potential danger to the fundamental right to life.

According to **Mr. Ashwani Mahajan**, Convener, Swadeshi Jagran Manch (SJM) “Given this credible evidence from a MOHFW- Government of India’s premier institute, unhealthy packaged food should have a ‘Warning label’ not a health star rating. The reason being such foods is dismissive of our traditional food culture. Stars would only provide legitimacy to harmful products, high in salt, sugar and saturated fats. The stakeholder meeting that took the decision to include HSR had the overwhelming presence of the food industry, which is a huge conflict of interest and should be avoided when it comes to food policy.”

Dr. Arun Gupta briefed about efforts of NAPI in reaching out to the Ministry of Health, PMO and President of India to intervene and move towards a fair policy that protects the health of consumers and not of the food industry.

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Fig. : Source -the Study quoted above.