

NUTRITION ADVOCACY IN PUBLIC INTEREST-India (NAPi)

March 11, 2022

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To,
**Sh. Narendra Modi,
Hon'ble Prime Minister,
Government of India
New Delhi.**

Sub: Concerns Reg. FSSAI's Decision to Include Health Star Rating in Draft Regulation

Hon'ble Sh. Narendra Modi Ji,

Greetings from Nutrition Advocacy in Public Interest in India (NAPi)!

We are a group of independent experts within a national think tank on nutrition – consisting of experts in epidemiology, human nutrition, community nutrition and pediatrics, medical education, administration and management. We have decades of experience in our respective fields. We have come together since 2016 to advocate on nutrition policy in public interest.

As you are aware India is facing a public health crisis of rising obesity, diabetes, cancers, hypertension and cardiac diseases. We welcome that the Government of India is working towards policy formulation to address it.

India's Dietary Guidelines developed by National Institute of Nutrition, state "The shift from traditional to 'modern' foods, changing cooking practices, increased intake of processed and ready-to-eat foods, intensive marketing of junk foods and 'health' beverages have affected people's perception of foods as well as their dietary behaviour."

In this context, we are extremely concerned about a 'decision' taken by FSSAI in a meeting of Stakeholders on Front of Pack Labelling (FOPL) on unhealthy food packets. To accept Health Star Rating (HSR) as its method of FOPL.

"...HSR may be incorporated in the draft regulations and the stakeholders may provide their comments on the same as per due procedure."

With this background, we organised a consultation on 9th March 2022; "**Warning Labels or Health Star Rating (HSR) on Unhealthy Food Products: What Should India Choose.**" in which more than 100 concerned scientists, public health and nutrition experts participated. Dr. Ashwani Mahajan (National Co-Convener of Swadeshi Jagaran Manch) and Dr. Vandana Shiva Director of Navdanya chaired the meeting.

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In this consultation public health experts from Australia and Chile presented their experience of implementing Health Star Rating and Warning Labels as FOPL respectively and shared relevant scientific evidence and evaluation.

According to them HSR could be misleading and controversial as it led to providing more stars to foods that don't deserve to be called healthy or are explicitly unhealthy. It was emphasized that HSR is creating "health halos"; while warning-based systems could be more easily understood. The type of food processing that leads to synthetic foods should also be considered in such decisions.

The HSR modelling, therefore, is fundamentally flawed.

Presentations from Chile described how Chile successfully implemented a law to curb obesity and related non-communicable diseases in the country that had the elements of food labelling and restriction in marketing, using WHO thresholds and warning labels. Evaluation done subsequently showed convincing positive outcomes on terms of consumer behaviours. Warning labels were recognized, understood and valued by the population. This led to a change in population behaviour triggered by children. Chile showed that changes in consumption happened within a 2-year period and did not result in any job losses. Several countries have already adopted warning labels since Chile.

Another expert from the University of Sao Paulo shared valuable insights about the design of labels and what are the key differences between HSR and Warning Labels and why India should choose warning instead of HSR. Other experts and consumer groups also shared their valuable experience of the process and agreed that HSR is not the way to go for India's health.

Our webpage has these presentations along with a video recording of the consultation, evidence and key points of difference for your kind perusal. <https://www.bpni.org/labels-or-hsr-on-upf-what-should-india-choose/>

NAPi has developed a policy brief on this subject (Attached), it was shared at the consultation and has received endorsement from over a hundred experts in public health and nutrition.

The consultation finally recommended **mandatory warning labels** on unhealthy packaged foods. On the 25th of February, a consortium of AIIMS also recommended simple 'warning labels' on unhealthy packaged foods.

We urge you to intervene using your highest office, to change the 'decision' taken by FSSAI. Further, we also request that Government of India should lead and set an example in this region and the world through the following steps:

1. Frame a parliamentary law to halt the rise of consumption of unhealthy foods that includes restriction of aggressive marketing as an urgent measure to

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achieve a meaningful result to stem the public health crisis of rapidly escalating Non-Communicable Diseases.

2. FOPL nutrition warning system should be immediately implemented and made mandatory based on WHO Standards.
3. An educational campaign for people to understand what are unhealthy foods must be launched.
4. Put highest GST slab on all unhealthy foods.

With thanks and kind regards,

Yours Sincerely,



Dr. Arun Gupta on behalf of the NAPi Team

Copy to:

Sh. Rajiv Gauba, Cabinet Secretary for Necessary Action

Dr. Mansukh Mandaviya, Minister of Health and Family Welfare, GOI

Dr. Vinod Kumar Paul, Member, NITI Aayog, GOI

Shri. Rajesh Bhushan, Secretary, Minister of Health and Family Welfare, GOI

Shri Arun Singhal, Chief Executive Officer, FSSAI