## Front-of-pack nutrition labelling in India

Indian policy-makers are trying to curtail the rising consumption of processed foods that are high in fat, sodium, and sugar.1 Front-of-pack nutrition labelling is widely considered to be a powerful and simple tool for discouraging consumption of processed foods. The Food Safety Standards Authority of India is considering implementing symbol-based front-of-pack nutrition labelling, which they intend to make mandatory. In 2018, the Food Safety Standards Authority published draft regulations for front-of-pack nutrition labelling and made them available to the public online.<sup>2</sup> It considered different symbols and nutrient profiling models and has proposed a format based on nutrient-level cut-offs derived using the recommended dietary allowances for Indians (described by the Indian Council of Medical Research). WHO recommendations will be considered when Indian-specific nutrient cut-off levels are not available.2 According to the proposed regulation, if the total amounts of calories, fats, transfats, sugar, and sodium per serving exceed the stipulated limits, it would be indicated in red colour. However, there are some concerns regarding the proposed labelling format.

First, the proposed format focuses on nutrients of concern (fat, sugar, and salt). It is likely that many regional legume-based snacks, containing considerable amounts of protein, could be red labelled for salt and fat, whereas products like ready-toconsume buttermilk, which could contain relatively high amounts of added salt, will be exempt from mandatory front-of-pack nutrition labelling as they are considered single ingredient products.2 Such dichotomy could be misleading. The proposed front-of-pack nutrition labelling recommends following a per serving format, but other labelling formats using nutritive value per unit information could be tested in India.3

Second, the proposed labelling format appears to be aimed only at individuals who are literate and nutritionally aware. Almost a quarter of the Indian population is illiterate, therefore pictorial representation would allow better engagement and understanding.

Third, it will be crucial to involve the food industry. Unfortunately, Indian food industries have expressed many concerns over the proposed format,<sup>6</sup> especially using the colour red as it indicates danger and could dissuade consumers from their products. They argue that positive and voluntary labelling is accepted in many countries and should be encouraged in India.

Although displaying nutrition information is already mandatory in India, a study<sup>5</sup> showed that Indians seldom use this information for making food choices as limited general and nutrition literacy mean understanding of the text-intensive nutrient information is difficult. However, this study<sup>5</sup> also shows that symbols on food labels (eg, vegetarian and non-vegetarian symbols) have better uptake and recall value. Therefore, it might be beneficial for front-of-pack labelling in India to be symbol based, with food images, logos, and health benefits. To be effective, front-of-pack symbols must be a part of the principal display panel and should have appropriate symbol-to-text ratio specifications. Mandatory front of pack labelling must be preceded by strong research and in a format that is understandable and acceptable to all.

We declare no competing interests.

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- Ministry of health and Family Welfare.
   Government of India. National Health Policy 2017. https://mohfw.gov.in/sites/default/ files/9147562941489753121.pdf (accessed Feb 24, 2020).
- Food Safety and Standard Authority of India. Notice calling for suggestions, views, comments etc from stakeholders on the draft food safety and standards (labelling and display) regulations. 2018. https://www.fssai. gov.in/upload/uploadfiles/files/Draft\_Notice\_ Comments\_Labelling\_Display\_11\_04\_2018. pdf (accessed Feb 24, 2020).
- Hawley KL, Roberto CA, Bragg MA, Liu PJ, Schwartz MB, Brownell KD. The science on front-of-package food labels. Public Health Nutr 2013; 16: 430-39.
- 4 Ministry of Home Affairs, Government of India. State of literacy. 2011. http:// censusindia.gov.in/2011-prov-results/data\_ files/india/Final\_PPT\_2011\_chapter6.pdf (accessed Feb 24, 2020).
- Vemula SR, Gavaravarapu SM, Mendu VVR, Mathur P, Avula L. Use of food label information by urban consumers in India—a study among supermarket shoppers. Public Health Nutr 2014: 17: 2104–14.
- Neo P. Wrong move, wrong time: India's colour coded labelling regulations hit red light with the industry. Jul 15, 2019. https://www. foodnavigator-asia.com/Article/2019/07/15/ Wrong-move-wrong-time-India-s-colourcoded-labelling-regulations-draft-hit-redlight-with-industry (accessed Feb 2, 2020).

