

**File No. RCD-15001/13/2021-Regulatory-FSSAI (E-1946)**  
Food Safety and Standards Authority of India  
(A Statutory Authority established under the Food Safety and Standards Act, 2006)  
**(Regulatory Compliance Division)**  
FDA Bhawan, Kotla Road, New Delhi-110002

Dated, the 29<sup>th</sup> October, 2021

**Subject: Minutes of Stakeholders' Meeting on Front of Pack Labelling -reg.**

A meeting with stakeholders to address issues/concerns related to 'Front of Pack Labelling' was held under the Chairmanship of Chairperson, FSSAI on 30<sup>th</sup> June, 2021 at FDA Bhawan, FSSAI, New Delhi.

2. Members from industry associations, consumer organisations and Working Group participated through virtual mode. This meeting was the sixth stakeholder consultation held in the past few months. Minutes of the meeting are attached herewith for information.



**(Vikas Talwar)**  
**Deputy Director**  
**Regulatory Compliance Division**

Enclosure – Minutes of the Meeting

## **Minutes of the Stakeholders' meeting on Front of Pack Labelling held on 30<sup>th</sup> June 2021**

A meeting with stakeholders to address issues/concerns related to 'Front of Pack Labelling' was held under the Chairmanship of Chairperson, FSSAI on 30<sup>th</sup> June, 2021 from 10:30 AM onwards at Conference Hall, 5<sup>th</sup> Floor, FSSAI, FDA Bhawan. Members from industry associations, consumer organisations and Working Group participated through virtual mode. List of participants is annexed. This meeting was the sixth stakeholder consultation held in the past few months.

2. A short presentation was made on the background of FOPL, challenges being faced in introducing FOPL policies in the Indian market, the nutrients to be displayed on the FOP label and FOPL design to be used. Further, the various FOPL models used across the world along with the literature studies undertaken for the effectiveness of FOPL models were presented.

3. After the presentation, CEO, FSSAI stressed the criticality of moving ahead on this subject. The following issues were discussed:

a) **Standardisation of Serve Size for back of pack:** There was consensus that such standardization is required. The industry members informed that the issue of standardisation of serve sizes is being undertaken by them and will be shared shortly. It was decided that standardized serve sizes may be shared by FSSAI as a guidance document thereafter.

{Action: CII to submit their inputs on standardized serve sizes in consultation with other industry bodies by the end of July, 2021 }

b) **Nutrients to be displayed:**

(i) **Salt vs. Sodium:** Consumer organizations were of the opinion that salt is easily understood by common man rather than sodium and 90% of the sodium anyway comes from salt. However, the scientific members were of the opinion that it is the sodium content which is of actual concern for growing NCDs. They opined that sodium is derived not just from common salt but also from other salts used in food processing such as sodium benzoate, sodium carbonate, sodium bicarbonate, sodium sulphite, etc. Based on the reason that sodium is the nutrient of concern and is also easily measurable (from the implementation point of view), a consensus was reached on use of Sodium for fixing thresholds for FOPL, although the term "salt" could possibly be used on FOPL for the sake of ease of understanding.

(ii) **Total Sugars vs. Added Sugars:** Similarly with regards to Sugar, keeping NCDs and consumer health in mind, total sugar was proposed for display on FOPL. The scientific members opined that although it is the added sugars that are processed, sugars in general beyond certain limit are a health concern and presentation of total sugars along with energy in kcal on the front of pack would help consumers to make an informed choice.

After detailed deliberation, it was concluded that 'Total Sugars' appears to be the best option to proceed with, considering the health concerns, acceptability around the globe and

ease of analytical testing. Moreover, energy calculations are based on total sugar and not added sugar and with energy in tandem on the FOPL, a consumer would have a better informed choice as against the Added Sugar. Hence, consensus was formed on using Total sugar for FOP labels.

(iii) **Total Fats vs. Saturated Fats:** While ‘Saturated Fat’ is mentioned on the FOPL labels internationally, a concern was raised regarding dairy products, which are widely consumed in India and contain comparatively higher saturated fats. In this regard, it was mentioned that in FOPL models, dairy products generally have a separate category and different thresholds than general foods to accommodate their basic nutritional composition. Members from consumer organizations opined that use of Saturated fat may single out a particular type of fat as bad fat and keeping issues like obesity (and not just cardiovascular diseases) in mind; it is more preferable to indicate Total fat. The scientific members reiterated the fact that an ideal combination of fats (MUFA, PUFA and SAFA) is important and less than 10% of energy should come from saturated fats. It was also noted that total energy content would also be mentioned on FOPL, and would provide adequate information as far as obesity is concerned. Considering the use of Saturated fats across the world and ICMR and WHO recommendations on saturated fats (not more than 10% of the energy needs), a consensus was arrived on indicating saturated fat for FOP labels.

(iv) **Positive Nutrients:** While few members of the consumer organisations supported the idea of giving scores to positive nutrients and promoting the innovation of wholesome foods, some members strongly opined that the positive nutrients will mask the negative impacts of high sugar, salt and fat and food products will be marketed in a way so as to mislead the consumers. The positive nutrients are already shown in the form of claims on food packs also. On the other hand, members from Industry supported the idea of declaring the positive nutrients on the label and giving a holistic nutritional picture of the product to the consumers.

The scientific members expressed that the purpose and objective of FOPL should be kept in mind before finalising on this aspect. First and foremost they must inform the consumers of the negative nutrients in food products. There are many positive micronutrients which need to be considered and finalizing the criterion to be used for them would take time. They can be incorporated in a gradual manner as and when we are prepared.

Considering all the comments, it was concluded that while finalising the FOPL model design, in case of Nutrient specific labels on FOPL, positive nutrients shall not be considered on the FOPL at all. However, in case we adopt Summary labels, positive nutrients may be considered for inclusion in FOPL, provided that the thresholds shall be set in a manner so as not to override/mask the negative nutrients in the product. Sri Ashim Sanyal, Sri Amit Khurana, Sri George Cherian and Ms. Anindita Mehta disagreed with this decision and their dissent was recorded.

Since there were no issues on declaration of energy values in kcal and removal of trans fats from the FOPL, these were accepted by all as such.

c) **Serve Size and per 100g/ml criteria:** Industry suggested that per serve basis is more suitable to be declared on FOPL as it is what the consumer eats and this can also stimulate habits of eating food in right portions by the Indian consumers. The Industry was requested to provide details of countries where reference serve sizes have been standardized and are being used for declaration on FOPL. UK was cited as an example but it was observed that serve sizes are only for guidance purpose there. FOPL in UK uses 100g/ml as a basis and portion size is used only beyond the reference size of 100g/ml. Rest of the members including the consumer associations and scientific members opined that per 100g/ml criteria is more suitable and rational.

It was decided that 100g/ml shall be kept as reference unit for thresholds on FOPL considering that no information on serve sizes is available at present and the acceptability and understanding of 100g/ml as a unit is higher and it enables a rational comparison among products.

d) **Number of categories:** It was highlighted that countries where FOPL models are being used, have provided limited number of food categories for FOPL. For instance, Chile and UK have used only two categories namely foods and beverages/solids and liquids, Nutriscore has four categories and Health Star Rating has 6 food categories.

Since the biological effect of saturated fats, sodium and sugar is same for all food products, the category has, per se, no direct bearing on the FOPL. It was proposed to consider setting thresholds under 2 broad categories as in other countries and a few other categories may be designed for exclusive products such as dairy, etc. as per scientific rationale. This idea was wholeheartedly welcomed by most members except a few from Industry due to reservations regarding huge variety of products in the Indian market, large MSME sector and variance among them.

It was decided that the Scientific Panel shall initiate discussion on setting thresholds under 2 broad categories (solid/liquids or foods or beverages) as in other countries and a few categories may be added on exclusive products such as dairy, etc. on the basis of scientific rationale, as per nutritional variance of the products. {Action: Standards Division, FSSAI}

e) **Type of FOP label:** The consumer organisations were in support of warning labels and Industry expressed support towards monochrome GDA. However, there are no substantive studies to support effectiveness of monochrome GDA. The consumer organisations stated that based on the success stories of Warning labels in other countries and considering that a mean level rating, i.e. a 2-star, 3-star or Amber colour under Summary labels do not give a clear picture to the consumers, warning labels may be considered for FOPL in India.

CEO, FSSAI mentioned that based on the literature scan carried out at FSSAI, the studies around FOPL are of two types, i.e. impact assessment of an existing model and surveys on understanding of various proposed models. However, the studies have geographical bias and the FOPL systems analyzed varied w.r.t. implementation (mandatory or voluntary) and were introduced at different points of time. Hence, there are supportive as

well as unsupportive studies on all the FOPL models including Warning Labels as well as the Nutriscore, HSR, etc.

The study titled, 'A pilot study to identify effective front-of-package labels for packaged foods in India' presented by Consumer Voice was also discussed and it was observed that the sample size is very low and the results are also somewhat confusing. Since the final report of the study has not become available yet and there are no credible studies in India with large sample size, no conclusion can be made based on the same.

It was concluded that FSSAI may commission a survey-based study through an institution of excellence like IIMs to analyze major FOPL models that are available across the globe with the objective to identify ease of understanding and behavioural change of Indian consumers on a national level. All participants unanimously agreed to go along with the recommendations arrived at in such a study. Participants stressed the need for quick and timely completion of this study. *{Action: RCD, FSSAI}*

### **Concluding Remarks:**

Chairperson, FSSAI congratulated the house for finally arriving at a consensus on broad issues of FOPL. She remarked that the journey towards FOPL has been trying for long to build consensus among all stakeholders. Most of the aspects have been decided upon today to the satisfaction of all stakeholders. She mentioned that the objective of FOPL, i.e. informed choices for consumers needs to be central point in all the decisions undertaken on this subject and hence, a simple, easy to understand and easy to administer FOPL design needs to be implemented soon.

The meeting ended with a vote of thanks to the Chair.

## Annexure

**List of Participants:**

1. Ms. MeetuKapur,Executive Director, CII
2. Mr. Abhinav Singh, FICCI
3. Ms. Nirupama Sharma, Joint Director & Head –Food Processing & FMCG, ASSOCHAM
4. Ms. Mallika Verma, PHDCCI
5. Mr. Sanjay Khajuria, CIFTI-FICCI
6. Mr. Amit Bhasin
7. Mr. Rajesh Kumar Gupta, Bikano
8. Ms. Mili Bhattacharya, Coca Cola India Ltd.
9. Mr. Vijay Gaur, Head Regulatory Affairs, Danone India
10. Ms. Jyoti Vij, FICCI
11. Dr. Neelu Khurana, DGM-QA, Haldiram
12. Mr. Arun Mishra, HUL
13. Mr. Krishna Kumar Joshi, ITC Foods
14. Mr. Shaminder Singh, Pepsico
15. Ms. Parna Das Gupta, Director Regulatory and Government Affairs-South Asia-Kelloggs
16. Ms. Anshu Gupta, Genmills
17. Mr. Kumar Kalpam, Mother Dairy
18. Dr. Prabodh Halde, Marico
19. Dr. AnirudhaChhonkar, Head Regulatory Advocacy, Nestle India Ltd.
20. Mr. Vikas Jain, PMV Nutrients
21. Ms Sangeeta Chaddha, HUL
22. Ms Shreya Pandey, Member AIFPA
23. Mr. Kajal Debnath, DFM Foods LTD.
24. Ms. Poonam Aggarwal, Danone India
25. Mr. Phani Kumar, Zydus Wellness
26. Mr. Ashish Dixit, Dabur, India Ltd.
27. Ms. Rika Ranjan, Haldirams
28. Ms. Rashida Vapiwala, Principal Investigator, M/s The Nutrition Alchemy
29. Ms. Anindita Mehta, CERC
30. Mr. George Cheriyan, Director, CUTS International.
31. Prof. Bejon Kumar Misra, Founder, Healthy You Foundation
32. Ms. Saroja Iyer, Executive Director, Citizen Consumer and Civic Action Group, Chennai
33. Mr. Ashim Sanyal, CEO, Consumer Voice
34. Mr. Amit Khurana, Director,CSE
35. Ms. Sonal Dhingra, CSE

**FSSAI Officials:**

1. Ms. Inoshi Sharma, Executive Director (CS)
2. Dr. N. Bhaskar, Advisor Standards
3. Shri Sunil Bakshi, Head (Regulations and Codex)
4. Dr. Amit Sharma, Director (Imports)
5. Shri Anil Mehta, Joint Director (RCD)
6. Shri P. Karthikeyan, Deputy Director (Regulations/Codex)
7. Ms. Kriti Chugh, AD (RCD)
8. Ms Ratna Shrivastava, AD (Regulations)
9. Ms. Manpreet Kour, TO (Standards)
10. Ms. Apoorva Sharma, TO (RCD)
11. Mr. Balaji, TO (Standards)

**Expert Members:**

1. Dr.Madhavan Nair
2. Dr.Asna Urooj
3. Dr. Alok Kumar Srivastav
4. Dr. Rekha Harish
5. Dr. Seema Puri