

5. Mandatory Front-Of-Package Labelling- Polity

In a recent judgment, a Supreme court Bench directed the Food Safety and Standards Authority of India (FSSAI) to consider introducing mandatory front-of-package warning labels on packaged food products high in sugar, salt and saturated fat.

Supreme Court Push for Front-of-Package Labelling Reform – In 2025, the Supreme Court of India directed an expert committee under the Food Safety and Standards Authority of India to recommend amendments to the Food Safety and Standards (Labelling and Display) Regulations, 2020, for implementing front-of-package labelling.

I. Concept of Front-of-Package Labelling (FOPL)

Definition

1. The World Health Organization (WHO) defines Front-of-Package (FoP) labelling as simplified, interpretive nutrition information displayed prominently on the front of packaged foods.
2. Designed to enable quick, informed consumer decisions at the point of purchase.

Core Objectives

1. Reduce information asymmetry between manufacturers and consumers.
2. Provide simplified nutritional signals rather than complex nutrient tables.
3. Address behavioural biases in food choices.
4. Support public health policy aimed at reducing diet-related non-communicable diseases (NCDs).

Types of FoP Labelling Globally

1. Warning labels (e.g., "High in Sugar") – Chile model.
2. Traffic light system – UK model (Red/Amber/Green).
3. Health Star Rating (HSR) – Australia & New Zealand.
4. Nutrient-specific numeric systems – some EU countries.

These models vary in stringency and interpretive clarity.

II. Evolution of FoPL in India

Initial Proposal (2014)

1. Proposed by an expert committee constituted in 2013 by FSSAI.
2. Aimed at addressing rising NCD burden linked to processed food consumption.

2018 Draft Proposal

Suggested **red warning labels** for nutrients exceeding prescribed thresholds.

Focused on

1. Total sugar
2. Total fat
3. Sodium

2019 Draft Regulations

1. FSSAI released Food Safety and Standards (Labelling and Display) Regulations.
2. Proposed colour-coded front labels.
3. Subsequently separated FoPL from broader labelling reforms in December 2019 for independent review.

2022 Proposal – Health Star Rating (HSR)

1. On 15 February 2022, FSSAI proposed adopting the **Health Star Rating system**.
2. Rating scale – 0.5 to 5 stars.
3. Intended to indicate overall nutritional quality.

Codex Alimentarius Commission Position

1. Recognises FoP labelling as a tool to help consumers easily understand nutritional information.
2. Encourages science-based and non-misleading labelling standards.

III. Need for FoPL in India

Rising Burden of NCDs

India faces rapid increase in –

1. Obesity
2. Type 2 Diabetes
3. Hypertension
4. Cardiovascular diseases

2023 R-INDIAB study findings –

1. 101 million Indians living with diabetes (11.4%).
2. 136 million with prediabetes.

Dietary transition toward ultra-processed foods is a key driver.

High Consumption of Packaged Foods

Urbanisation and lifestyle changes have increased –

1. Ready-to-eat consumption
2. Fast food penetration
3. Aggressive marketing to children

Limitations of Traditional Labelling

1. Nutritional information placed in small font at back of pack.
2. Requires literacy and technical knowledge to interpret.
3. Consumers often make rapid purchasing decisions without detailed scrutiny.

Behavioural Economics Perspective

1. FoPL acts as a “nudge” mechanism.
2. Salient warning labels alter purchasing behaviour.
3. International evidence shows reduction in sugary drink consumption post-warning labels (e.g., Chile).

Alignment with SDG Commitments

1. Supports SDG 3 – Good Health and Well-being.
2. Contributes to reduction of premature mortality from NCDs.

IV. Governance and Regulatory Framework

Food Safety and Standards Authority of India (FSSAI)

Legal Basis

1. Established under the Food Safety and Standards Act, 2006.
2. Consolidates multiple food laws under a single regulatory authority.

Nodal Ministry– Ministry of Health and Family Welfare.

Governance Structure

Chairperson appointed by Central Government. 22 members, with one-third women.

Assisted by –

1. Scientific Committees and Panels
2. Central Advisory Committee

Core Functions

1. Frame food safety standards.
2. Regulate labelling and display norms.
3. Accredited food testing laboratories.
4. Lay guidelines for certification bodies.

V. Key Challenges in FoPL Implementation

Institutional Delays

1. Multiple expert committees (2015, 2018 onwards).
2. Reports not always made public.

3. Policy uncertainty and prolonged consultations.

Industry Resistance

1. Food industry opposed strong red warning labels.
2. Concern over impact on sales and brand reputation.
3. Lobbying diluted nutrient criteria.

Dilution of Nutrient Standards

Shift from –

1. Total sugar → Added sugar
2. Total fat → Saturated fat

Critics argue this reduces comprehensiveness and may mislead consumers.

Choice of Health Star Rating Model

1. HSR provides aggregated score rather than explicit warning.
2. Risk of “health halo effect” where unhealthy products may still get moderate ratings.
3. Less effective than direct warning labels according to public health experts.

Consumer Awareness Gap

1. Without awareness campaigns, interpretive value reduces.
2. Low nutrition literacy in large population segments.

VI. Policy and Public Health Implications

Market Reformulation Incentives

Strong FoPL systems push manufacturers to reduce –

1. Salt
2. Sugar
3. Trans fats

Encourages healthier food innovation.

Equity Considerations

1. Lower-income consumers disproportionately affected by NCDs.
2. Clear labelling enhances informed choices across literacy levels.

VII. Way Forward

Adopt Science-Based Nutrient Thresholds

1. Align with WHO recommended daily intake norms.
2. Base thresholds on Indian epidemiological data.

Prefer Warning-Based Models

1. Evidence suggests warning labels are more effective than rating systems.
2. Simple and direct communication.

Integrate with National Health Programmes

Link FoPL with

1. Eat Right India
2. NPCDCS
3. School nutrition policies

Consumer Awareness Campaigns

1. Nationwide IEC campaigns.
2. Digital platforms explaining FoPL symbols.
3. Integration into school curriculum.

Transparency in Policy-Making

1. Publish committee reports.
2. Insulate decision-making from industry lobbying pressures.

Conclusion

Front-of-Package Labelling is a critical preventive public health intervention aimed at combating India's escalating NCD burden. While policy discussions have progressed over nearly a decade, implementation has been slowed by regulatory delays and industry resistance.

A robust, science-based, transparent, and warning-oriented FoPL system—integrated with broader nutrition and health strategies—can significantly improve consumer awareness, encourage industry reformulation, and strengthen India's commitment to sustainable health outcomes under SDG 3. In the long term, FoPL represents a structural shift from reactive healthcare expenditure to proactive public health governance.

Source - https://www.business-standard.com/industry/news/sc-asks-fssai-to-respond-on-proposal-for-front-of-pack-food-labelling-126021401462_1.html

