

Newer Systems of Healthy Rating of Food Products

Dr A Sivakumar

Head - Regulatory Affairs, South Asia, Unilever



Objective of Front of Pack Labelling

Front-of-pack labelling (FOPL) is a form of supplementary nutrition information tool to help....

01

Educate consumers on nutritional quality of F&B products

02

Enable consumers to make healthier choices quickly & intuitively

03

Drive reformulation by F&B industry



Types of FOP labelling globally

Nutrient Specific System

Numeric only (GDA labelling)



Colour Coded Labels (Multiple traffic Lights)



Warning Labels (Black octagon labels of Chile)



Summary Indicator System

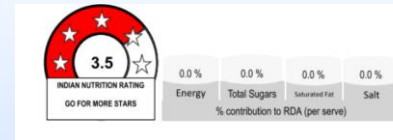
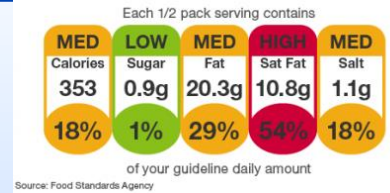
Scale based Graded labels (Health Star Rating, NutriScore)



Endorsement Symbols (Choices logo, Key hole)



IMPLEMENTED FOPL MODELS – a comparison



Model	Health Star Rating	Nutri Score	Multiple Traffic Light	Warning Label	Israel	India
Type	Summary assessment	Summary assessment	Nutrient specific	Nutrient specific	Nutrient specific	Summary assessment
Scoring system	Points & scores vary across categories	Difference of P & N points	Colour coding (G/A/R) & Warning (L/M/H)	Warning – Monochromatic (Black)	Warning – Monochromatic (Red)	Points & scores vary across categories
Specific comment	Not nutrient specific; diabetics, hypertensives cannot identify items high in sugar, salt		Can provide conflicting information as a product can simultaneously be red and green	Easy to understand, highlights unhealthy options within a category		Not nutrient specific
Year implemented	2014 Voluntary	2017 Voluntary	2013 Voluntary	2016 Mandatory	2020 Mandatory	2022 Voluntary
Reference size	<ul style="list-style-type: none"> 100 g in case of Food or 100 ml in case of liquids/beverages/drinks MTL in addition also has a portion size criteria; To be used if portion/serving size exceeds 100g (food) or 150 ml (drinks) 					

FOPNL Journey in India

India's FOPNL Journey



Committee on junk foods in school

2013



Expert committee to assess fat, salt, sugar consumption and its impact on health

2015




Mandatory declaration of salt; proposed FOPL for **calories, fat, sugar & trans fat**

2018




FSSAI issues draft L&D regulation
Mandatory declaration of **energy, sat fat, sodium, added sugar with their contribution to % RDA on FOP based on WHO SEARO guidelines**

2019



FSSAI notifies L&D regulation but FOPL not part of it; **Nutrition Alchemy** to assess the Indian packaged foods market and arrive at thresholds for nutrients of concern; **Dr. Madhavan Nair** to review the threshold values

2020



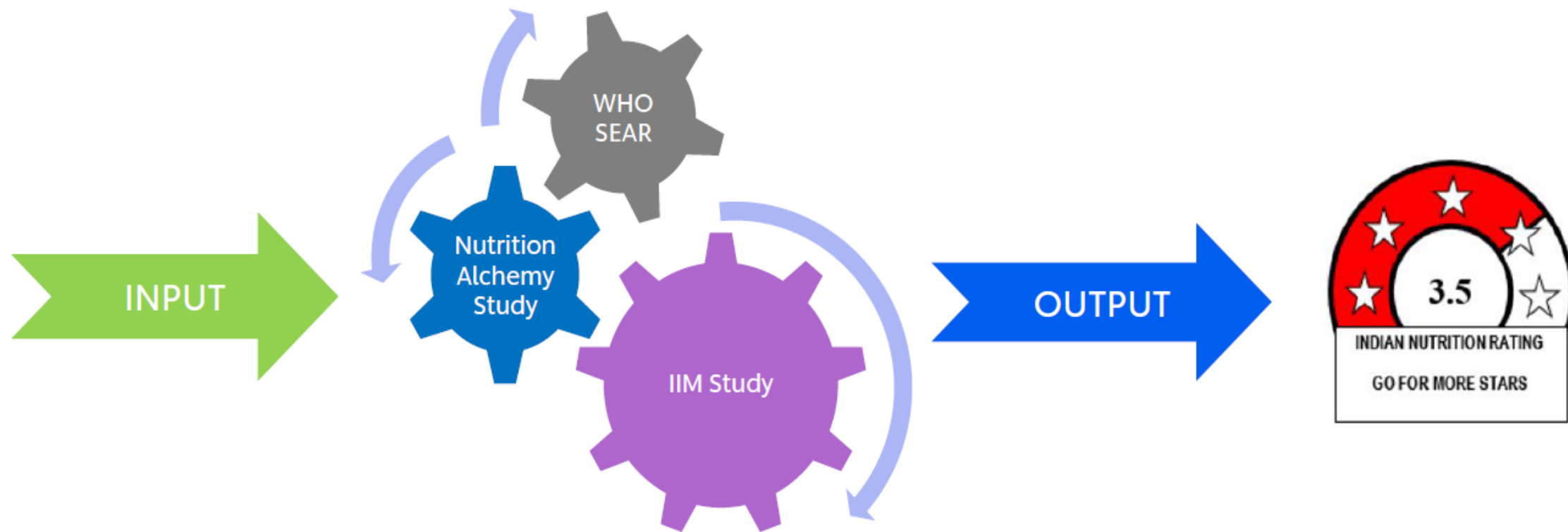
Consensus on declaration of Energy (kcal), Sodium (maybe as salt), Total Sugars, Saturated Fat on FOPL & to have fewer categories; **IIM to identify best FOPL format**

INR announced as the FOPL model for India

2021-22

Indian Nutrition Rating

FSSAI Labelling & Display Amendment Regulation 2022-Indian Nutrition Rating (INR)



Food Safety & Standards (Labelling & Display) Amendment Regulations, 2022

Front of Pack Nutrition labelling for India: INR



0.5 stars (least healthy)
5 stars (healthiest)



Based on Health Star Rating format



Nutrients of Concern:
E, TS, SAFA, Sodium
Positives: Fruits, Veg,
Nuts, Legumes,
Millets, Fibre, Protein



2 Product categories- solids and liquids



100g/100ml & as sold



Voluntary 2023
Mandatory 2027

INR Product Categories

- Category 1: Solids (Including Dairy products & Beverages)**
- Category 2: Liquids (Excluding Dairy products)**
- Category 3: Exempted from FOPNL**



2 Product
categories-
solids and liquids

Baseline Reference Value System/Capping/Formula

Table 1. Baseline reference values for Food risk factors and minimum percentage of positive factor per 100 gm or 100 ml on 'as sold' basis.

Food Risk Factors	Solid Foods	Liquid Foods (non-dairy)	Positive Factors	Minimum, %
Energy, kcal	400	30	Fruits & vegetables	10 (solid foods) & 5 (liquid foods)
Total Sugars, g	21	6	Nuts, legumes & millets	10
Saturated fat, g	5	3	Dietary Fibre	3
Sodium, mg	450	100	Protein	1.5

Table 2. INR Baseline points for Category-I: Solid Foods (Incl. Dairy products and beverages) per 100 g

Category-I includes all food categories except category no. 6.8.1 & 14.0 mentioned under Appendix A of FSS (Food Products Standards and Food Additives) Regulations, 2011

Baseline points	Energy, kcal	Sat. fat (g)	Total sugars (g)	Sodium (mg)	Positive Point			
					FV	NLM	Dietary Fibre	Protein
0	≤80	≤1.0	≤4.2	≤90	≤10	≤10	≤3	≤1.5
1	>80	>1.0	>4.2	>90	>10	>10	>3	>1.5
2	>160	>2.0	>8.4	>180	>15	>15	>6	>2.0
3	>240	>3.0	>12.6	>270	>20	>20	>9	>2.5
4	>320	>4.0	>16.8	>360	>25	>25	>12	>3.0
5	>400	>5.0	>21	>450	>30	>30	>15	>5
6	>480	>6.0	>25.2	>540	>35	>35	>18	>7
7	>560	>7	>29.4	>630	>40	>40	>21	>10
8	>640	>8	>33.6	>720	>45	>45	>24	>15
9	>720	>9	>37.8	>810	>50	>50	>27	>20
10	>800	>10	>42	>900	>55	>55	>30	>25
11		>12	>46.2	>990				>30
12		>14	>50.4	>1080				>35
13		>16	>54.6	>1170				>40
14		>18	>58.8	>1260				>45
15		>20	>63	>1350				>50
16		>22	>67.2	>1440				
17		>24	>71.4	>1530				
18		>26	>75.6	>1620				
19		>28	>79.8	>1710				

Table 4. Capping of positive points

Category	Capping criteria
Solid Foods	if INR baseline points are ≤ 20, can score up to 15 points for protein and 10 points each for FV, NLM & Dietary Fibre
	if INR baseline points are > 20, can score upto 7 points for protein and 5 points each for FV, NLM & Dietary Fibre
Liquid Foods	if INR baseline points are ≤ 10, can score upto 10 points for FV and upto 15 points for protein
	if INR baseline points are > 10, can score up to 5 points for FV and up to 7 points for protein

Table 5: Formula to Calculate Star Rating

$$\begin{aligned}
 & \text{Final INR score} \\
 & = (\text{INR baseline points}) - [(\text{INR FV* points}) + (\text{INR NLM* points}) + (\text{INR P* points}) + (\text{INR F* points})]
 \end{aligned}$$

Table 6: Indian Nutrition Rating

<i>Indian Nutrition Rating</i>		
<i>INR scores for Solid Foods category, with final Indian Nutrition Rating</i>		<i>INR scores for Liquid Foods category, with final Indian Nutrition Rating</i>
Stars	Points	Points
5	≤ -11	≤ 0
4.5	-10 – -7	1 – 2
4	-6 – -2	3 – 4
3.5	-1 – 2	5 – 6
3	3 – 6	7 – 9
2.5	7 – 11	10 – 12
2	12 – 15	13 – 15
1.5	16 – 20	16 – 18
1	21 – 24	18-20
0.5	≥ 25	≥ 20

Exempted List of Products

Schedule-IV

Category-III Solid Foods/Liquid Foods exempted from FOPNL under INR. The category numbers refer to food categories as provided under FSS (FPS & FA) Regulations, 2011.

Cat. No.	Category description
1.1.1	Milk and buttermilk (plain)
1.1.1.1	Milk (plain)
1.1.1.2	Buttermilk (plain)
1.2	Fermented and renneted milk products (plain), excluding food category
1.2.1	Fermented milks (plain)
1.2.1.1	Fermented milks (plain), not heat-treated after fermentation
1.2.1.2	Fermented milks (plain), heat-treated after fermentation
1.2.2	Renneted milk (plain)
1.3	Condensed milk and analogues (plain)
1.3.1	Condensed milk (plain), evaporated milk(s), sweetened condensed
1.3.2	Beverage whiteners
1.4	Cream (plain) and the like cream and malai
1.4.1	Pasteurized cream (plain), cream and malai
1.4.2	Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain)
1.4.3	Clotted cream (plain)
1.4.4	Cream analogues
1.5	Milk powder and cream powder and powder analogues (plain)
1.5.1	Milk powder and cream powder (plain)
1.5.2	Milk and cream powder analogues
1.8	Whey and whey products, excluding whey cheeses
1.8.1	Liquid whey and whey products, excluding whey cheeses
1.8.2	Dried whey and whey products, excluding whey cheeses whey powder
2.1	Fats and oils essentially free from water
2.1.1	Butter oil, anhydrous milk fat, ghee
2.1.2	Vegetable oils and fats
2.1.3	Lard, tallow, fish oil, and other animal fats

Further Alignment Needed

- ✓ Algorithm not appropriate for Indian diets, changes sought
- ✓ As consumed principle needs to be included
- ✓ Need for new food categories with substantiative rationale
- ✓ Exemption Principle needs to be relooked at
- ✓ Dietary Fibre – major necessity for Indian diets – hence need more favourable consideration
- ✓ Vitamins/Minerals – major micronutrient deficiency in India – FSSAI promoting Fortification – at least those Vitamins/minerals need to be given positive points
- ✓ Capping of Positive points

Working groups will be formed to work on these aspects and outcomes will be delivered in a given Timeframe

Exemption from INR

- ✓ Exemption list must be critically reviewed and should include only those foods in which INR should not apply.
- ✓ Important considerations should be given so that there is no undue perception of food products being healthy/unhealthy by not putting stars rating on them.
- ✓ For example, including a 'dairy' category and a category for 'vegetable oils and fats' can have a substantial effect on the levels of saturated fat in the diet & hence should not be exempted

Type of milk	Saturated fat content
Buffalo milk	4.63g/100ml
Cow's milk	2.7g/100ml
Toned milk	2.0g/100ml
Skimmed milk	<0.5g/100ml
Butter	51g/100g
Ghee/Clarified Butter	58g/100g

Even HSR has a separate category for dairy and fats and has not exempted these food groups

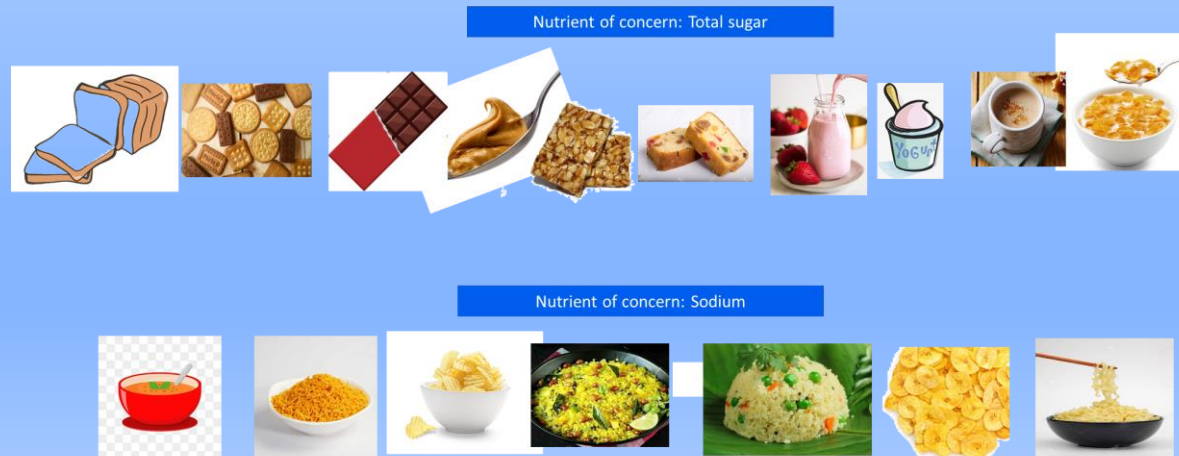
Why we need product group specific categories in INR?

Product Specific Categories

1. Product Universe under Category 1 is too diverse



2. Nutrients of concern for different food/product categories are different



3. Consumer Dilemma – How will consumer choose a healthier beverage?

Fruit Juice made with 100% fruit juice content (no added sugar)



INR

Category 2- 100ml liquid

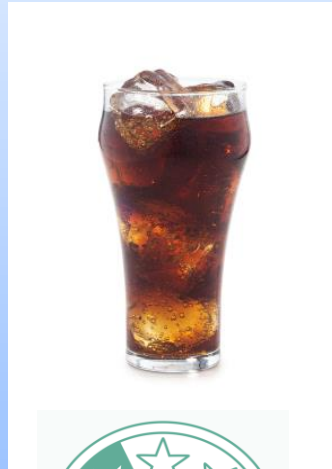
Fruit Beverage with 25% fruit juice content, (with added sugar)



INR

Category 2- 100ml liquid

Non Fruit Beverage (with added sugar)



INR

Category 2- 100ml liquid

Milk based beverages (with added sugar)



INR

Category 1 (Dairy)

Cereal-millet based beverage (with lower added sugar)



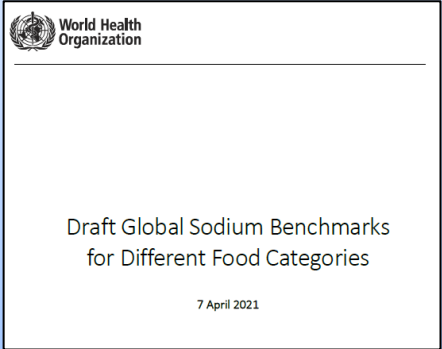
INR

Category 1- 100g Solid

- 1) Miscommunication to consumers
- 2) Does not incentivise industry to reformulate

4. Reformulation is better driven using product group categories

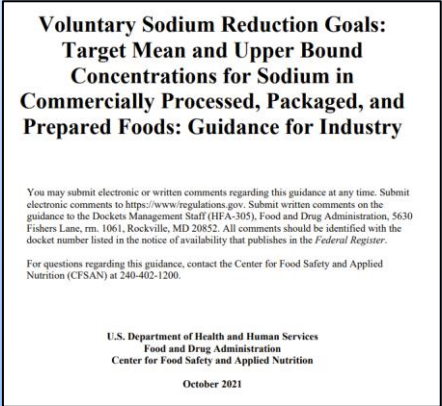
NPMs to drive salt reduction are category specific



[WHO global sodium benchmarks for different food categories](#)

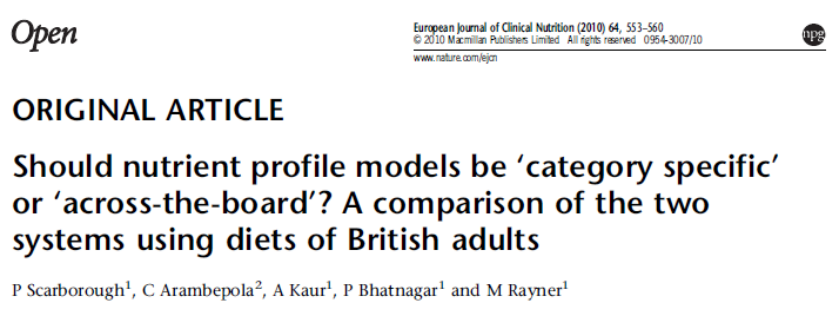


[Salt reduction: targets for 2024 - GOV.UK \(www.gov.uk\)](#)



<https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-voluntary-sodium-reduction-goals>

Product category specific criteria work best



Conclusions:

- All other things being equal, nutrient profile models designed to promote an achievable healthy diet should be category specific and with a limited number of categories.

INR could dis-incentivise industry reformulation efforts

Fruit Juice made with 100% fruit juice content, no added sugar



Fruit Beverage with 60% fruit juice content



Fruit Beverage with 25% fruit juice content



No change in healthiness scores

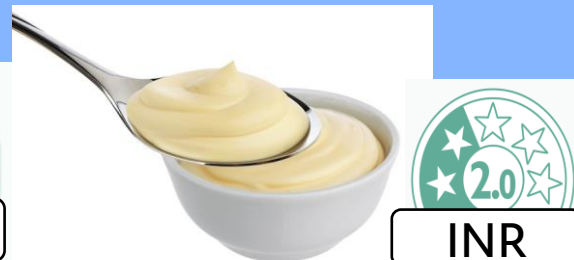
Regular Mayo

High calories; high fat



Light Mayo

60% reduced calories; 65% reduced fat



Lighter

90% reduced calories; 90% reduced fat



No significant change in healthiness scores

Product images- For representational purpose only

Product group specific standards will incentivise industry to reformulate and drive behaviour change among consumers

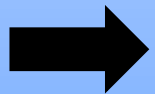
Light

60% reduced calories; 65% reduced fat vs regular mayonnaise



Lighter

90% reduced calories; 90% reduced fat vs regular mayonnaise



Ketchup



Ketchup with 20% reduced Sodium



5. India pledge and even FSSAI 2018 draft regulation followed a product category specific approach

Food Safety and Standards (Labelling and Display) draft Regulations, 2018 provided thresholds for **16 categories**

India Pledge Common Nutrient Criteria has **11 product categories**

Schedule - I
Nutrient Thresholds for Food Categories

Category No.	Category	Sub-Categories included	Total fat (g / 100 g or 100 ml)	Sodium (g / 100 g or 100 ml)
1.0	Dairy products and analogues, excluding products of food category 2.0			
1.1	Milk and dairy-based drinks	1.1.2: Dairy-based drinks - flavoured milk and/or fermented	7.0	No threshold
1.6	Cheese and analogues	1.6.1: Unripened cheese 1.6.2 Ripened cheese 1.6.2.1 Ripened cheese, includes rind 1.6.2.2 Rind of ripened cheese 1.6.2.3 Cheese powder 1.6.3 Whey cheese 1.6.4 Processed cheese 1.6.4.1 Plain processed cheese 1.6.4.2 Flavoured processed cheese, including containing fruit, vegetables, meat etc. 1.6.5 Cheese analogues 1.6.6 Whey protein cheese	20.0	0.60
1.7	Dairy-based desserts		8.0	0.10



FOOD & BEVERAGE ALLIANCE OF INDIA
India Policy on Marketing Communications to Children

DATE: 1st July 2016

Food and Beverage Alliance of India (FBAI) members commit either to:

- Only advertise products to children under the age of 12 years that meet common FBAI pledge nutrition criteria¹; or
- Not to advertise their products at all to children under the age of 12 years.

The above policy covers food and beverage product marketing communications² that are primarily directed to children under 12³ in all covered media⁴.

In addition, FBAI members agree not to engage in food or beverage product marketing communications to children in primary schools⁵.

FBAI will publish periodic reports to demonstrate compliance with this policy.

This policy will become applicable to all FBAI member companies by 31 December 2016.

Individual member companies may maintain or adopt specific policies that go beyond the FBAI policy.

Venkatesh Kini
 President India & South West Asia
 Coca-Cola India Pvt. Limited

Mainak Dhar
 Managing Director
 General Mills India

Sangeeta Pendurkar
 Managing Director
 Kellogg India Private Limited

Roberto Grasso
 Chairman & Managing Director
 Ferrero India Private Limited

Suresh Narayanan
 Chairman & Managing Director
 Nestle India

Andrew Leakey
 General Manager
 MARS CHOCOLATE, India & India Sub-Continent,
 Mars International India Private Limited

D. Shivakumar
 Chairman and CEO
 PepsiCo India Holdings Pvt. Ltd.

Sanjay Mehta
 CEO/Chief Managing Director
 Hindustan Unilever Limited

Chandramouli Venkatesan
 Managing Director
 Mondelez India Foods Private Limited



Alignment with Key Principles

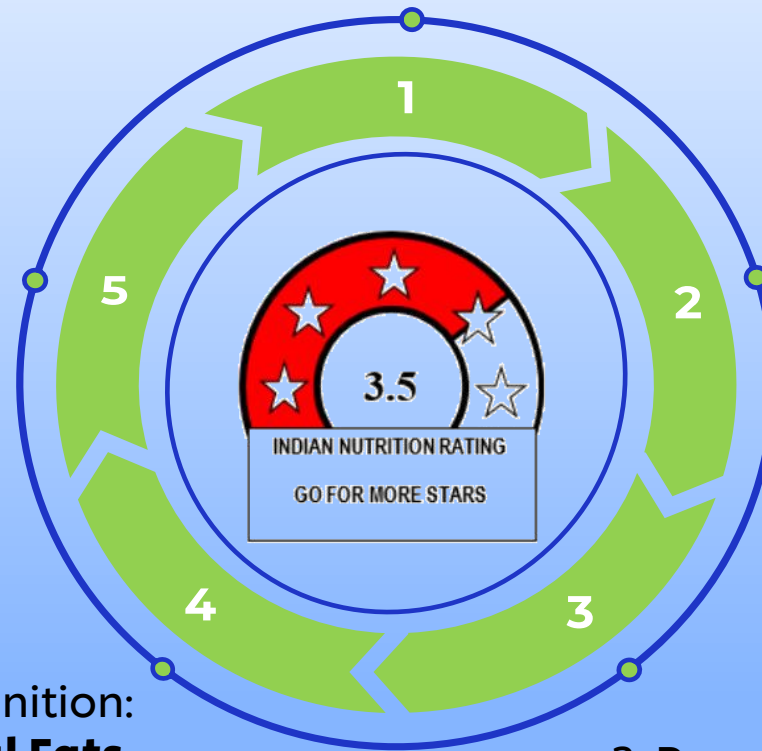


Principles	INR
All inclusive model	Critical categories exempted
Good between product group differentiation	Poor differentiation – only 2 categories
Focus on Nutrient of Concern	Yes
Expression in line with behaviour change model	Logo expression is misleading (healthier product gets more red rating)
Resulting in behaviour change	Yet to be evaluated
Scientifically Sound	Yes, based on HSR

Summary

1. Inclusion of **category specific product groups**

5. **Exclude HFSS definition**
as it creates ambiguity



2. **Per serving/portion-based algorithm** and not 100g/100ml

4. Broaden the "Positives" definition:
Vitamins, Minerals, Essential Fats

3. **Reconstitution principle** to be applied
(Beverages-HFD, Squash and Soups)

Thank You

