

COMMUNICATING DISEASES



A lab study by the Centre for Science and Environment has found extremely high levels of salt, fat and trans fat in junk foods responsible for obesity and non-communicable diseases like hypertension, diabetes and heart ailments. A nexus between the powerful processed food industry and the government is sabotaging efforts to enforce a sound statutory framework suggested six long years ago. Food giants mislead and misinform consumers about the food they eat, while the food regulator remains the willing spectator

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PHOTO MONTAGE: RITIKA BOHRA

THINK BEFORE you open the next pack of Haldiram's Classic Nut Crackers or dig into a regular Non Veg Supreme Pizza from Domino's. Only 35 grams of the scrumptious nut crackers would finish up around 35 per cent of your daily permissible salt intake and 26 per cent of the allowed fat consumption. And four slices of that cheesy pizza would make you consume 99.9 per cent of the day's allowed salt and 72.8 per cent of fats.

Consumption of these junk foods, that are high in salt, fats and trans fats can have deadly impacts. Doctors say they are an open invitation to non-communicable diseases like diabetes, hypertension, heart ailments and even cancer. "These diseases are difficult to manage if manifested early in life," says Ambrish Mithal, head of the endocrinology and diabetes division, Medanta Hospital, Gurugram, Haryana. A 2016 report by the Indian Council of Medical Research (ICMR) shows a worrying trend—disease burden due to unhealthy diet, high blood pressure, high blood sugar, high cholesterol and overweight has increased from 10 per cent to 25 per cent since 1990. And the victims, many a time, were ill-informed and unsuspecting consumers.

It never bothered Manjeet Singh, an advocate in Delhi, that her 11-year-old son gorged on packaged and fast foods every day. It kept him full and happy, and saved

her a lot of time and trouble. Not until the boy started complaining of double vision and headaches. Manjeet was shocked when doctors said he had high blood pressure. “They strictly advised him to reduce weight, not eat junk food and adopt a low-salt diet, else he would be under the risk of cardiac problems and diabetes,” she says.

Manjeet could have helped her son had she known, upfront, what was inside those ultra-processed food packs. The fine print declaring the amount of nutrients is not of much help. “With my vision, I would be spending the entire day buying food if I start reading them,” says Ashok Gulati, a 64-year-old retired professional. It’s impossible for 22-year-old Parvesh Sinha, a departmental store worker who never went to school, to know what he eats.

The Centre for Science and Environment (CSE), a Delhi-based research and advocacy non-profit, had shaken up the country in 2012 when it found high amounts of salt, fat, trans fat and carbohydrate in foods people love to eat. Seven years later, where exactly do we stand?

To understand this, between July and October 2019, CSE’s Environment Monitoring Laboratory again tested their content in 33 popular packaged and fast foods marketed by Indian and multi-national companies and available across the country (see ‘Junk we eat’ on p27). The samples were collected from grocery stores and fast food outlets in Delhi. The lab used internationally accepted testing methods listed by the Association of Official Analytical Chemists (AOAC). Carbohydrate in these foods was tested by the widely-used colorimetry method.

The lab results were used to understand how much of each nutrient contributes to the recommended dietary intake for the Indian population. It correlated the results with the serving size or weight of the products to understand the actual intake.

The results, to say the least, were shocking. Chips and *namkeens* had way more salt and fat than one should consume in a snack. Instant noodles and soups had too much salt. The analysis was based on

the Recommended Dietary Allowance (RDA), derived after reviewing the recommendations of World Health Organization (WHO), National Institute of Nutrition-India, ICMR and the scientific expert groups of the Food Safety and Standards Authority of India (FSSAI). The RDA for salt was reached at 5g, 60 g fat and 300 g carbohydrate for one person in a day. The trans fat limit was 2.2 g. The calculations were made taking into account the accepted 2,000 Kilocalorie that a healthy person requires in a day.

Considering we have three meals in a day and two snacks, our mealtime consumption of these nutrients should not be more than 25 per cent of RDA, and the two main snacks of the day must not add more than 10 per cent of RDA. Now take a look at what the CSE lab tests found.

CHIPS AND NAMKEENS

What’s advertised by Indian cricket captain Virat Kohli as a healthy and “Smart option for smart snacker” is, in fact, unhealthiest in terms of salt. Of all the chips packets tested, Too Yumm Multigrain Chips had maximum salt—1 g in 30 g of chips. In other words, 30 g of this gives double the day’s allowance of salt from a snack. And even a healthy green vegetable or a leafy salad becomes a source of extra salt. So think again before grabbing on the second snack of the day if you have already munched on Too Yumm Multigrain Chips.



JUNK WE EAT

CSE laboratory tested 33 products—14 packaged foods and 19 fast foods—for salt, fat, trans fat and carbohydrates. The results:

	Samples tested	Salt (g/100g)	Fat (g/100g)	Trans fat (g/100g)	Carbohydrate (g/100g)
PACKAGED FOOD	Lay's India's Magic Masala by PepsiCo	1.94	32.50	0.21	51.53
	Lay's American Style Cream and Onion Flavour by PepsiCo	1.55	29.19	0.27	48.96
	Uncle Chipps Spicy Treat by PepsiCo	2.81	35.04	0.17	51.81
	Classic Salted Chips by Haldiram's	1.38	36.52	0.33	52.19
	Pudina Treat Chips by Haldiram's	2.28	36.70	0.23	52.93
	Too Yumm Multigrain Chips Chinese Hot and Sour by RP-Sanjiv Goenka Group	3.23	17.17	0.08	64.85
	Classic Nut Cracker by Haldiram's	4.99	44.79	0.56	17.66
	Aloo Bhujia by Haldiram's	3.05	43.48	0.33	34.69
	Bingo! Mad Angles Delight Achaari Masti by ITC	1.69	42.94	0.22	53.71
	Kurkure Masala Munch by PepsiCo	2.49	34.03	0.20	54.90
	Maggi Masala by Nestlé	3.69	14.93	NT*	62.18
	Atta Noodles Chatpata by Patanjali Ayurved	3.95	22.06	NT*	51.23
	Ching's Secret Schezwan by Capital Foods	4.25	17.82	NT*	53.80
	Knorr Classic Thick Tomato Soup by Hindustan Unilever	10.44	8.43	NT*	64.61
FAST FOODS	Cheese Whopper Veg by Burger King	1.36	13.88	0.19	20.22
	Cheese Whopper Chicken by Burger King	1.35	10.65	0.16	12.51
	Veg Zinger (with cheese) by KFC	1.54	10.89	0.10	19.69
	Chicken Classic Zinger (with cheese) by KFC	1.22	19.47	0.20	16.41
	McVeggie Burger by McDonald's	1.22	9.95	0.08	33.16
	McAloo Tikki Burger by McDonald's	1.02	9.11	0.08	29.16
	McChicken Burger by McDonald's	1.11	9.51	0.08	27.68
	Chicken Maharaja Mac by McDonald's	1.45	10.05	0.05	20.25
	Fries (regular) by Burger King	0.85	13.60	0.12	25.98
	Fries (medium) by KFC	0.47	14.90	0.15	25.94
	Fries (medium) by McDonald's	0.71	14.48	0.15	44.77
	Hot Wings (4 pieces) by KFC	1.44	21.42	0.14	10.51
	Peppy Paneer Cheese Burst (regular) by Domino's	1.34	9.55	0.21	20.40
	Non-veg Supreme (regular) by Domino's	1.41	12.31	0.22	26.53
	Classic Tomato Margherita (personal) by Pizza Hut	1.18	7.40	0.23	35.81
	Chicken Supreme (personal) by Pizza Hut	1.70	10.32	0.23	26.00
	Big Spicy Paneer Wrap by McDonald's	1.58	17.71	0.24	21.12
	Paneer Tikka (6 inch) by Subway	1.38	18.27	0.23	16.83
	Chicken Seekh Kabab (6 inch) by Subway	1.88	13.90	0.22	16.95

*Not Tested



Too Yumm Multigrain Chips has the highest salt content amongst the chips tested

In fact, all the chips tested either had high salt or high fat, or both. Lay's India's Magic Masala, Uncle Chipps Spicy Treat and Haldiram's Chips Pudina Treat exceeded 10 per cent RDA of both salt and fat. One-fifth of the day's fat RDA gets blown away if one consumes one serve of Haldiram's Chips Pudina Treat.

Worse, there are chips packets that mention 30 g as the serving size—the amount allowed for consumption—but are not available in that size only. For instance, the ₹20 pack of Lay's American Style Cream and Onion that weighs 52 g, mentions 30 g as its serving size. In effect, it offers more chips than one can consume in one go. So before relaxing on the sofa with a packet of chips, read the fine print and do the mental math to know exactly how many can be enjoyed without getting worried about health. Haldiram's Chips Pudina Treat does not even mention the serving size. In fact, it attracts consumers by offering them extra chips. Too Yumm Multigrain Chips gives vague information on the serving size. It says: "Image is a pictorial reference



of serving suggestion". While the picture shows just 4-5 chips, that's definitely not how much children stop with.

Eating chips frequently results in dental problems, a common ailment otherwise left ignored. "Chips are sticky and remain in the oral cavity for long hours. Soon, they start to ferment resulting in tooth decay and cavities," says Praveen Chaudhary, senior dentist and head of the department at Jaypee Hospital in Noida, Uttar Pradesh.

CSE's lab tested four varieties of *namkeens*. All but one had high salt and fat content, but Haldiram's Classic Nut Cracker had criminally high salt, exhausting almost 35 per cent of RDA—much higher than one should consume in one full meal. It mentions the 35-g serving size only on its website. Checking this online before tearing the pack open is a difficult proposition.

Haldiram's Aloo Bhujia exhausts more than 21 per cent of the salt RDA. But there's no way consumers can know how much salt they consume from these *namkeens* and chips.

Of the 14 packed foods CSE tested, 10

declare sodium in their products, not salt, which leaves the consumer misinformed. Three don't declare sodium or salt. Only one declares salt. Manjeet, for instance, carefully read the nutritional information of the chips her son regularly munches on, but could not tell how much salt he consumes. Clearly, food companies are complicating facts. One should consume not more than 2 g sodium in a day, but companies give the information in mg. Now do the mental math one more time.

INSTANT NOODLES AND SOUP

Akshat, a 13-year-old school student, eats Nestle Maggi Masala instant noodles twice or thrice a week. It's easily available in his school canteen. But a 70-g pack of this puts 2.6 g salt into our body. Patanjali that promotes its Atta Noodles Chatpata with the punchline '*Jhatpat Banao, Befikr Khao*', contains 2.4 g salt in one pack. Remember, 5 g is all that is allowed through the day. Ching's Secret Schezwan goes a step further. It labels less than half the amount of what it actually contains, according to CSE's lab results.

Similarly, instant soup is popular in winters, but is definitely not a healthy option. Just one serve of Knorr Classic Thick Tomato soup can exhaust over one-fourth of the daily salt limit. And people love to have it as a starter before meals. So,



Facts v claims

McDonald's offers a combo meal in place of a fresh home-cooked meal. Results show this could be deadly



Just a few days back, McDonald's released a full-page newspaper advertisement saying, "Stuck with ghiya-tori again? Make the 1+1 combo you love." The company withdrew the advertisement later

Chicken Maharaja Mac



92.1%
Salt RDA*
exhausted



53.2%
Fat RDA*
exhausted

Recommended Dietary Allowance (RDA) for salt is considered 5 g per day, 60 g for fat, 300 g for carbohydrate. Trans fat limit is 2.2 g

even a healthy meal afterwards can shoot up your daily salt intake, that too within a short period. As consumers misconstrue these as fresh food for the cooking it involves, the industry makes hay.

BURGER AND FRIES

Advertisements affect people's senses and stimulate responses such as craving to eat. In the long run, this becomes a habit, says Uday Sinha, a professor at the Institute of Human Behaviour & Allied Sciences, Delhi. In a recent full-page newspaper advertisement, McDonald's made a disparaging comment on freshly cooked home food. It said: "Stuck with *ghiya-tori* again? Make the 1+1 combo you love." Even FSSAI called it an irresponsible advertisement as it was against the national efforts to promote the right eating habits, especially among children. Read along to know how healthy McDonald's combo is.

Eat one Chicken Maharaja Mac and your daily permissible salt intake is almost over in one go. It has 4.6 g salt, leaving only 10 per cent, or 0.4 g more for the entire day. The fat content is over half the prescribed daily limit for a meal. A medium McDonald's fries accounts for almost one-fifth of the daily fat need. The combo has an astounding 103 per cent salt, 72 per cent fat, 13 per cent trans fat and 33 per cent carbohydrate.

Unsuspecting vegetarians are not any luckier. A vegetarian Cheese Whopper from Burger King will leave you with just over one-fourth of the daily salt quota and less than half of that for fat. As its regular fries accounts for almost one-fifth of the daily fat need, adding it to a combo meal, stuffs you with just too much nutrients. Burger, fries and fried chicken from KFC's 5-in-1 classic zinger box would give 20 per cent more fat than the day's quota along with very high levels of salt and trans fat.

"Food companies know that India is a naive market for junk food. A large population is unaware of nutrition and good food. Junk food is being made and sold in a manner that it is addictive," says Vandana Prasad, a community paediatrician. So

think twice before you choose that combo meal over home-cooked food.

Smaller burgers are cheap and attract people. But their contribution to RDA is big. KFC's Veg Zinger with cheese can exhaust up to three-fourths of the daily salt brink and 45 per cent of the fat limit. Its Chicken Classic Zinger with cheese finishes over 80 per cent of fat and over 60 per cent of salt threshold. Burgers with cheese have more trans fats.

PIZZA, SANDWICH AND WRAP

Pizza is considered a healthy fast food meal option because of the vegetables it comes with, but CSE lab results found it is loaded with salt and fat, and has high levels of trans fat. It tested vegetarian and non-vegetarian pizzas from Domino's and Pizza Hut along with one sachet of oregano seasoning it comes with. These were regular or personal pizzas meant to be consumed by one person. Domino's Non Veg Supreme has about 5 g salt, while Peppy Paneer cheese burst has only slightly less. So, no more space for salt from any other food, if these pizzas are consumed.

Non-veg Supreme also exhausts about three-fourths of the permissible fat. This also provides high levels of unhealthy trans fat—about one-third of the limit. Pizza



Hut's Chicken Supreme has more salt than one needs for the day. Even the humble Classic Tomato Margherita from Pizza Hut can add over 50 per cent of the daily salt intake, 25 per cent of fat and about one-fourth of the trans fat limit. Excessive trans fat content in all pizzas that were tested is a cause for concern.

CSE lab tests also examined sandwiches, often perceived as healthy food for the raw vegetables it uses. But the result was disturbing. Salt, fat and trans fat content in sandwiches are as high as in pizzas. A 6-inch Subway Chicken Seekh Kabab sandwich has about 5 g salt, 39 g fat and 0.62 g trans fat. This is not just the amount of salt one can have in an entire day but also adds up to 65 per cent of the recommended fat levels and 28 per cent of trans fats. Its vegetarian option, the Paneer Tikka sandwich, is not any healthier and exhausts over three-fourths of salt and fat limits, and one-fourth of trans fat limit. McDonald's Big Spicy Paneer Wrap will give you about 4 g of salt and 45 g of fat.

FACTS ON TRANS FATS

Trans fats are deadly. Their intake must be avoided to prevent heart diseases. CSE found that most food companies either do not disclose or give more than the amount they declare (see 'Misleading labels'). Haldiram's Classic Nut Cracker, for instance, had 4.6 times trans fat it claims to have. Fast food companies Domino's and Subway do not mention trans fats at all on their website. But all four of their samples that CSE tested had high trans fats. Burger King and KFC mention 0 g, suggesting no trans fats. That's not the case. Trans fats found in two pizza samples of Pizza Hut were higher than what the company declared.

"A diet high in trans fat can increase the risk of heart disease," says Mithal of Medanta Hospital. But clearly, companies are not bothered.

(Names of consumers have been changed to protect their identity)

[For more on the study, visit www.downtoearth.org.in]

MISLEADING LABELS

Most of the tested food samples had higher trans fat levels than declared

Samples tested for trans fat	Declared value (g/100g)	Lab result (g/100g)	Deviation (%)
PACKAGED FOODS			
Lay's India's Magic Masala by PepsiCo	0.1	0.21	111.6
Lay's American Style Cream and Onion Flavour by PepsiCo	0.1	0.27	168.8
Uncle Chipps Spicy Treat by PepsiCo	0.1	0.17	69.5
Classic Salted Chips by Haldiram's	0.1	0.33	230.0
Pudina Treat Chips by Haldiram's	0.1	0.23	127.6
Too Yumm Multigrain Chips Chinese Hot and Sour	0.2	0.08	(-)61.6
Classic Nut Cracker by Haldiram's	0.1	0.56	460.1
Aloo Bhujia by Haldiram's	0.1	0.33	232.1
Bingo! Mad Angles Delight Achaari Masti by ITC	0.1	0.22	120.0
Kurkure Masala Munch by PepsiCo	0.1	0.2	100.0
FAST FOODS			
Cheese Whopper Veg by Burger King	0	0.19	-
Cheese Whopper Chicken by Burger King	0	0.16	-
Veg Zinger (with cheese) by KFC	0	0.10	-
Chicken Classic Zinger (with cheese) by KFC	0	0.20	-
McVeggie Burger by McDonald's	0.06	0.08	33.3
McAloo Tikki Burger by McDonald's	0.07	0.08	14.3
McChicken Burger by McDonald's	0.12	0.08	(-)33.3
Chicken Maharaja Mac by McDonald's	0.07	0.05	(-)28.6
Fries (regular) by Burger King	0	0.12	-
Fries (medium) by KFC	0	0.15	-
Fries (medium) by McDonald's	0.09	0.15	66.7
Hot Wings (4 pieces) by KFC	0	0.14	-
Peppy Paneer cheese burst (regular) by Domino's	ND*	0.21	-
Non-veg Supreme (regular) by Domino's	ND*	0.22	-
Classic Tomato Margherita (personal) by Pizza Hut	<0.1	0.23	-
Chicken Supreme (personal) by Pizza Hut	0	0.23	-
Big Spicy Paneer Wrap by McDonald's	0.22	0.24	9.1
Paneer Tikka (6 inch) by Subway	ND*	0.23	-
Chicken Seekh Kabab (6 inch) by Subway	ND*	0.22	-

*Not declared by the company

Note: Trans fat content of Nestle Maggi Masala, Patanjali Atta Noodles Chatpata, Ching's Secret Schezwan and Knorr Classic Thick Tomato Soup were not tested.

Figures of the declared trans fat values of fast foods have been obtained from company websites.

All the companies declare approximate values

RED ALERT

Delays and dilutions have derailed regulations of packaged and fast foods. Is it time to press the panic button?

THE TEST results of the Environment Monitoring Laboratory at the Centre for Science and Environment (CSE) have unmasked two anomalies. First, food manufacturers blatantly sell products that have unhealthy levels of nutrients. Second, a nexus between the industry and regulating agencies backs this brazen act. India, therefore, urgently needs a robust law on labelling and disclosure of nutritional information on food packs.

Six long years have passed since the need to label these, upfront, was recognised.

The baseline was that consumers must know everything about the food they buy. The existing Food Safety Standards (Packaging and Labelling) Regulations, 2011, is too weak and ineffective (see 'Labelling proposals' on p34). Even something as basic as salt is not mandatorily disclosed. But the statutory framework is just not coming along, clearly due to pressure from the powerful junk food industry and the resultant red tape. The chronology of events is a sorry tale of progressive delays, dilutions and vested interests.



LABELLING PROPOSALS

Under the new regulations, companies will have to display nutritional data clearly on front of their product packs

PROVISIONS



CURRENT LAW

FSS (Packaging & Labelling) Regulations, 2011



PROPOSED REGULATION

Draft FSS (Labelling and Display) Regulations, 2019

NUTRITION LABELLING

- Energy (in Kcal)
- Protein (in g)
- Carbohydrate with sugar (in g)
- Total fat (in g)
- Trans fat (in g) [included after law was amended in 2016]
- Saturated fat (in g) [included after law was amended in 2016]

These nutrients are to be declared at the back of pack per 100 g or ml or per serve

Serving size only in case of per serve declaration of nutrients

- Energy (in Kcal)
- Carbohydrate with sugar
- Trans fat
- Cholesterol
- Added sugar
- Protein
- Total fat
- Saturated fat
- Sodium

These nutrients are to be declared at the back of pack per 100 g or ml or per serve

Their per serve contribution to RDA*, considering 2,000 Kcal, 67 g of fat, 22 g of saturated fat, 2 g of trans fat, 50 g of added sugar, and 2,000 mg of sodium will also be declared

Serving measure and number of servings

FRONT-OF-PACK LABELLING

No provision

It has two parts

Upper part declares the amount of energy, saturated fat, trans fat, added sugar and sodium per serve

Bottom part declares per serve percentage contribution to RDA (this block to be coloured red if nutrients, except calories, exceed the defined threshold)

*Recommended Dietary Allowance, or RDA, is the quantity of nutrient one should consume in a day

Source: CSE

In 2013, Food Safety and Standards Authority of India (FSSAI), the country's food regulator, set up an expert committee to regulate junk food available in schools following an order of the Delhi High Court. Earlier, Uday Foundation, a non-profit, had demanded a complete ban on junk food in and around schools in a public interest petition. In 2014, the expert committee, comprising doctors, nutritionists, public health experts, civil society and industry, suggested labelling of calories, sugar, fat, saturated fat and salt on the front of food packs, or FoP (see 'Colour coding dropped from schools' draft' on p46). This would help people make an informed choice about the food they eat. CSE was a part of this committee.

But this report was not "convenient" and so in 2015, FSSAI set up a second expert committee to assess the consumption of fat,

salt and sugar and its health impacts. This 11-member panel was led by D Prabhakaran, then vice-president of Public Health Foundation of India. But two years later, this panel too endorsed the recommendations made by the first committee. It suggested to resolve ambiguities on the correct serving size of packed and fast foods and the exact nutritional information people need (see 'How much is one serve' on p42).

So no further procrastination was possible, or so you would think. It took FSSAI a year to be ready with the draft Food Safety Standard (Labelling and Display) Regulations, 2018. The draft sought mandatory declaration of salt as sodium chloride. Till now, salt did not figure in food labels. The draft also proposed FoP label, a key element of consumer information in the world. The upper part of the label would disclose the quantum of calorie, total fat,

FOOD, SAFETY, STANDARDS: A PROGRESSIVE ONSLAUGHT

Six years not enough for authorities to enforce regulations on packaged and fast food

June 2015

↳ FSSAI sets up 11-member expert committee led by D Prabhakaran, vice-president of Public Health Foundation of India, to assess the consumption of fat, salt and sugar in India and its health impacts

May 2017

↳ Prabhakaran committee endorses guidelines of 2013 committee
↳ It emphasises need for concrete action to resolve ambiguities on the correct serving size of packed and fast foods and the exact nutritional information people need

August 2018

↳ FSSAI again sets up a panel, led by B Sesikeran, former director of National Institute of Nutrition, to review the draft regulations in view of industry's concerns on FoP labels
↳ Committee's suggestions were not made public

July 2019

↳ FSSAI releases draft notification FSS (Labelling and display) regulations, 2019, with severely diluted FoP labelling
↳ Total fat is replaced with saturated fat, salt with sodium, total sugar with added sugar
↳ Recommended Dietary Allowance of added sugar (50g) kept same as that of total sugar
↳ Compliance to thresholds for FoP extended from two to three years
↳ Allows fast food companies 25 per cent deviation

March 2013

↳ Food Safety and Standards Authority of India (FSSAI) sets up expert committee
↳ The committee gives guidelines on junk food available in and around schools.
↳ It strongly recommends strengthening of nutrition labelling, front-of-pack labelling of calories, sugar, fat, saturated fat and salt

April 2018

↳ FSSAI releases draft Food Safety and Standards (Labelling and Display) Regulations, 2018
↳ It seeks to strengthen nutrition labelling, include mandatory declaration of salt (as sodium chloride), among others
↳ It proposes front-of-pack labelling of calorie, total fat, total sugar, trans fat and salt
↳ It provides thresholds for red colour coding of high fat, salt and sugar foods
↳ It proposes two years to comply with the thresholds for FoP

total sugar, trans fat and salt, and the bottom part would declare how much each of these contributes in percentage to the Recommended Dietary Allowance, or RDA. FSSAI has set RDA considering one person requires 2,000 Kcal in a day. The draft proposed to mark red on all nutrients that exceed thresholds.

This was a huge movement ahead as implementation of this notification would have changed the rules that allow food companies to rule our kitchens and stomachs. For once, we would have had the choice to know the quantum of salt, sugar or fat in the food we consume, not just in terms of quantity, but in terms of how much of our daily intake would get exhausted. But this was, obviously, too much for industry.

At a national consultation on food labelling regulations for safe and healthy food held on August 17, 2018, Pawan Agarwal, CEO of FSSAI, said, "Industry does not want the food to be labelled red, which represents danger." The 2018 draft remained a draft and to find a new way around it, FSSAI announced a third committee. This time, the committee was headed by B Sesikeran, former director of the National Institute of Nutrition. The recommendations of this committee were never made public.

Finally, when FSSAI came up with the second draft of the regulations in July 2019, it was a much diluted version (see 'Food, safety, standards: A progressive onslaught'). So now you would have thought this was the end. But no. The diluted version, which has seriously compromised public health, is still not acceptable, presumably to the powerful food industry. It is still not notified. After a draft is released for public comments, it should not take more than two months to be notified. But five months have gone by. If murmurs are to be believed, a new committee is in the works—to delay, prevaricate and dilute. It is clear that food is not the business of our health. It is the business of profit.

DELAYS AND DILUTIONS WEAKENING PUBLIC HEALTH

This saga of committees to finalise a regulation to determine FoP labels would be farcical, if it was not so tragic. For instance, the draft Food Safety Standard (Labelling and Display) Regulations, 2019, changes three of the five nutrients proposed to be displayed on the FoP label. It replaces salt with sodium, total fat with saturated fat, and total sugar with added sugar.

It is in industry's interest that the 2019 draft declares the presence of sodium on food pack, not salt—the ingredient that triggers hypertension. People have little understanding on sodium, its relation to salt, and how to calculate its value to find the salt content. But FSSAI has brazenly proposed sodium at the back and front of the pack in the draft (see 'Too complicated' on p40).

It is, again, in industry's interest that FoP declares saturated fat instead of total fat. Packaged foods are high in fat, but may or may not have high saturated fat. It does not address the problem in totality and may mislead the consumer to believe that fat other than saturated fat is not harmful.

Saturated fat is strongly linked to heart diseases which typically appear after adulthood. But a diet high in total fat can bring trouble at a much younger age. "It can cause obesity among children. Therefore, total fat should be depicted at front of food packs along with saturated fat," says Rekha Harish, head of the paediatrics department, Hamdard Hospital, Delhi. "Childhood obesity has become a growing concern now. The 2,000 Kcal threshold accepted by FSSAI is too high for children, and can lead to a much higher intake of fat and sugar," she adds. Part disclosure of fat on FoP, therefore, holds little merit. Before throwing total fat out of the FoP label, FSSAI could have explored the possibility of placing it alongside saturated fat, just like in the UK and South Korea.

In fact, total fat could have replaced trans fat, which is already on its way out of packed and fast food. FSSAI has already

IT IS IN INDUSTRY'S INTEREST THAT THE 2019 DRAFT DECLARES THE PRESENCE OF SODIUM ON THE FOOD PACK, NOT SALT—THE INGREDIENT THAT TRIGGERS HYPERTENSION

declared it would eliminate industrially produced trans fat by 2022. By this time, the red marking rule on FoP would be fully effective, if the draft is notified.

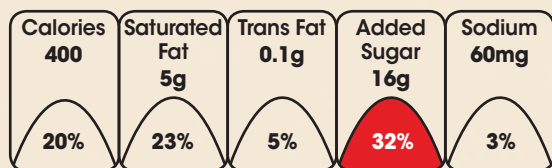
Another set of dilutions in the revised draft is in sugar—"total sugar" changes to "added sugar". This means the FoP label would skip information on the naturally occurring sugar in the food. Only sugar added while processing food would be displayed on the FoP label. This is not all. While it's decided to change total sugar to added sugar, it does not revise the RDA for sugar. Total sugar in the 2018 draft is limited to 50 g and now, added sugar—which is a component of the total sugar that we take—is also kept at 50 g. This is double the limit for added sugar. In other words, mislead and misinform is the name of this food game, all for profit.

What's more, the revised draft exempts beverages that provide less than 80 Kcal sugar from being marked red on FoP. A soft drink with 10-11 g added sugar in 100 ml, which would provide 40 to 45 of empty calories per 100 ml, could escape the red code if sold in small size. It is no coincidence that 150-200 ml size soft drinks are now available in the market. The regulator failed to realise that an unhealthy drink cannot become healthy if consumed in lesser quantity.

As per the World Health Organization (South-East Asia), the suggested threshold for added sugar is 2 g per 100 ml of water-based flavoured drinks. FSSAI, therefore, is ready to give five times the added sugar WHO

TOO COMPLICATED

India's proposed front-of-pack label is not consumer-friendly



As per Draft FSS (Labelling and display) Regulations, 2019

SIMPLE, EFFECTIVE

Countries use warning symbols to caution consumers

CHILE

(Implemented in 2016)



This represents "High in sugar". Similar "High in _" labels are mandatory for saturated fats, sodium and calories

PERU

(Implemented in 2019)



This represents "High in saturated fats". Similar "High in _" labels are mandatory for sodium, trans fat and sugar

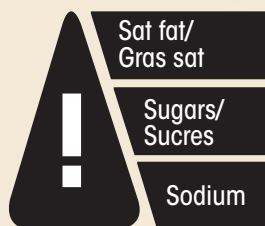
Israel (Proposed)



Israel proposes icons in their warning labels for "High sugar", "High sodium" and "High saturated fats"

Canada (Proposed)

High in/ Élevé en



Health Canada / Santé Canada

Suitable for India



The country should have red "High in _" warnings for calories, salt, sugar and fat

allows on soft drinks. So much extra sugar will not be marked red on the FoP label.

The new draft has not set any threshold for calories either. A product that barely passes the threshold test for total fat and total sugar but is high in total calories, would escape the red mark.

The draft gives a three-year window to companies to implement the regulations. In the first two years, a food product may remain 30 per cent above the threshold and come down to the permitted level by the third year. So, even if it is accepted that food is bad—is red category—industry has time to fix its act. And this when the draft remains a draft. Time is theirs to choose. We get bad health and bad regulations.

GLOBAL PRACTICE IS MOVING TO WARNING LABELS

Given so much delay and the public health challenge due to bad food, one would have hopes FSSAI to learn from the global best practice. Countries are learning that too many labels do not work. Instead, warning labels are the best option. Another concern is that with so many numbers on the front, the red mark on FoP for one component could mislead consumers. This is because other components may not be over the threshold. If this is coloured green, it would make us take decisions based on how many green boxes verses how many red boxes. This would mislead and misinform.

In the 2019 draft, FSSAI has kept open the option to add colours in the FoP labelling. So a colour like green, that gives a positive signal, may be added to the label in future. Such traffic light labelling sends a mixed message to the consumer and is known not to help the consumer.

This is why countries are choosing to introduce warning labels, which are marked prominently for each nutrient. This is the global best practice. Chile's warning label is a black and white octagonal sign to flag packaged foods with excess calories or nutrients. The label is easy to understand. It does not contain numbers and needs no

HOW MUCH IS ONE SERVE

In India, the serving size is not standardised. In absence of sound regulations, some companies declare it on their food packages, while some don't. There are a few who declare it on their websites. The draft Food Safety and Standard (Labelling and Display) Regulations, 2019, proposes the serving size and the number of serves to be mentioned. It also mandates per serve contribution to Recommended Dietary Allowance. But what does serving size really mean?

A serving size refers to the quantity of food typically consumed in one go. It varies for different food categories. For instance, it's 30 g for chips, 35 g for namkeen and 60 g for instant noodles.

The problem is that more often than not, the size of packets does not match the serving size. For instance, a 52-g or 60-g pack of chips can declare 30 g as the serving size. This leads to excess consumption. In case of fast foods, one ends up eating an entire burger.

The serving size could be kept simple. A handful, a spoonful or a cupful is much easier to understand. But that's unlikely to happen. All efforts in this case lead to one result—keep the consumer addicted to junk food and make sure they do not have enough information to make an informed choice.

calculations. All that it says is: “High in Sugar” or “High in Calories”. If a product is high in two ingredients, it will be highlighted through two octagons. At one glance, it warns the consumer how healthy or unhealthy a product is.

Warning labels were first implemented in Chile in 2016. Guillermo Paraje, an associate professor at Adolfo Ibáñez University, Chile says, “Warning labels can be understood even by six-year-old children—they are simple, clear and convey the information you need.” It has been effective and proven to simplify nutrition information.

A year after its implementation in Chile, “the per capita consumption of carbonated beverages reduced by 24.9 per cent in the first evaluation. Mothers, who did not understand labels earlier, now use the number of labels as a guide and understand that products with more labels are less healthy,” says Barry Popkin, a professor of nutrition at the UNC Gillings School of Global Public Health, US. Warning labels have been implemented in Peru and Canada. Uruguay, Singapore, Mexico and Israel are

at different stages of implementing them.

In Chile, warnings are big in size and occupy a substantial part of FoP. They are placed on the upper-right side of the pack with a white contrast border to the black labels. This enables clear identification.

Such a label can succeed in India because a big section of the population here is illiterate or cannot read English, the most used language. FoP labels for vegetarian or non-vegetarian food have been quite successful. FSSAI itself, through the existing regulations, specified the green and red dots so that the information was easy to comprehend. But the food regulator refuses to learn from its own experience.

WHAT DO WE EAT?

FSSAI may prevaricate and delay enforcement of its own regulations, but CSE has used the same regulations to see what we eat. What would really happen if the regulations were introduced and how would the food we eat fare? Would it be good to eat? Or, would it be red, telling us that the food is unsafe to eat?

Results of CSE's laboratory tests clearly show that all junk foods are red foods (see 'Mark junk food red' on p44'). Since all packed foods are high in salt and fat, they should have at least two red octagon symbols on their packs. In case of fast foods, barring fries which should be red for fat and a pizza that should be red for salt, all should be red for salt and fat. It is critical that the symbols are placed on the menu and display boards in restaurants.

CSE analysis reveals that packed and fast foods exceed the threshold by several times (see 'Mark junk food red' on p44, 45).

COUNTRIES ARE CHOOSING TO INTRODUCE WARNING LABELS, WHICH ARE MARKED PROMINENTLY FOR EACH NUTRIENT. THIS IS THE GLOBAL BEST PRACTICE



How all the **33 tested products** would look if the proposed red marking rule is applied to high fat and salt foods



Times the threshold for
Salt: 0.25 g sodium/100 g for chips, *namkeen* and instant noodles;
0.35 g/100 g for soups and fast food (FSSAI)
Fat: 8 g/100 g (WHO recommendations for Southeast Asia)

CHIPS



Lay's India's Magic Masala by PepsiCo



Lay's American Style Cream and Onion Flavour by PepsiCo



Uncle Chippis Spicy Treat by PepsiCo



Classic Salted Chips by Haldiram's



Pudina Treat Chips by Haldiram's



Too Yumm Multigrain Chips by RP-Sanjiv Goenka Group



NAMKEEN



Classic Nut Cracker by Haldiram's



Aloo Bhujia by Haldiram's



Bingo! Mad Angles Delight Achaari Masti by ITC



Kurkure Masala Munch by PepsiCo



Maggi Masala by Nestlé



Atta Noodles Chatpata by Patanjali Ayurved



FRIED CHICKEN



Hot Wings (4 pieces) by KFC



SOUP



Knorr Classic Thick Tomato Soup



Ching's Secret Schezwan by Capital Foods



BURGER



Cheese Whopper Veg by Burger King

SALT **1.5** FAT **1.7**



Cheese Whopper Chicken by Burger King

SALT **1.5** FAT **1.3**



Veg Zinger (with cheese) by KFC

SALT **1.7** FAT **1.4**



Chicken Classic Zinger (with cheese) by KFC

SALT **1.4** FAT **2.4**



McVeggie Burger by McDonald's

SALT **1.4** FAT **1.2**



McAloo Tikki Burger by McDonald's

SALT **1.1** FAT **1.1**



McChicken Burger by McDonald's

SALT **1.3** FAT **1.2**



Chicken Maharaja Mac by McDonald's

SALT **1.6** FAT **1.3**

FRIES



Fries (regular) by Burger King

SALT **1.0** FAT **1.7**

Fries (medium) by KFC

SALT **0.5** FAT **1.9**



Fries (medium) by McDonald's

SALT **0.8** FAT **1.8**

Burgers already have extremely high salt content. Adding fries to them in combo meals can be very harmful to health

SANDWICH AND WRAP



Big Spicy Paneer Wrap by McDonald's

SALT **1.8** FAT **2.2**



Paneer Tikka (6 inch) by Subway

SALT **1.6** FAT **2.3**



Chicken Seekh Kabab (6 inch) by Subway

SALT **2.1** FAT **1.7**

PIZZA



Peppy Paneer cheese burst (regular) by Domino's

SALT **1.5** FAT **1.2**



Non-veg Supreme (regular) by Domino's

SALT **1.6** FAT **1.5**



Classic Tomato Margherita (personal) by Pizza Hut

SALT **1.3** FAT **0.9**



Chicken Supreme (personal) by Pizza Hut

SALT **1.9** FAT **1.3**

Note: Salt values of CSE lab study were converted to sodium to compare the thresholds

Take the case of salt. FSSAI has set 0.25 g sodium per 100 g of chips, *namkeen* and instant noodles and 0.35 g per 100 g of soups and fast foods as the threshold. Knorr Classic Thick Tomato Soup was found to have about 12 times the salt threshold. It was eight times high in Haldiram's Classic Nut Cracker. Against the 8-g fat per 100 g threshold, most chips and namkeens had 2-6 times fat. McDonald's Big Spicy Paneer Wrap, Subway Paneer Tikka (6 inch) sandwich and four pieces of KFC Hot Wings had more than double the limit set for fat. This is clearly much more than 25 per cent of deviation from what the 2019 draft allows in fast foods.

Let's be clear that this is why industry does not want you to know. This is why industry is resisting enactment of the draft—its tactic is clear: new committee, new dilution.

The report of the 2018 committee, headed by Sesikeran, has never been made public. But it is this committee which brought in the most industry-friendly changes. This business also works best in shadows. The *New York Times* ran an article on September 16, 2019 with the headline 'A Shadowy Industry Group Shapes Food Policy Around the World' exposing how there is an association, innocuously termed International Life Sciences Research Institute, which works to lobby for big food business with governments. It should not surprise you that Sesikeran is a trustee of this "association". It is clear that the hand of business is working, even if it is behind closed

THE REPORT OF THE 2018 COMMITTEE, HEADED BY B SESIKERAN, HAS NEVER BEEN MADE PUBLIC. IT IS THIS COMMITTEE WHICH BROUGHT IN THE MOST INDUSTRY-FRIENDLY CHANGES

COLOUR CODING DROPPED FROM SCHOOLS' DRAFT

THE DRAFT Food Safety and Standards (Safe Food and Healthy Diets) Regulations, 2019, aimed at regulating high fat, sugar and salt foods in schools, is delayed by several years. The draft was put out in November 2019, but was heavily diluted from the recommendations made by the committee set up in 2013 by the Food Safety and Standards Authority of India (FSSAI). Centre for Science and Environment was part of this committee.

The panel had recommended colour coding of foods—red, yellow and green. It was the basis of the proposed school canteen policy, and existed till the February 2018 draft. But, it seems, the industry wanted to avoid it. This crucial point has been dropped in the 2019 draft.

committee doors and government offices.

But industry does not want to be quoted on the draft. An article published in the *Economic Times* on June 27, 2019 reported that Subodh Jindal, president, All India Food Processors' Association, found the regulations neither scientific nor practical. "The salt, sugar and fat content of packaged food depends on the taste requirement of the consumer and is not manufacturers' choice," it quoted him. But when CSE contacted him, he refused to comment.

PepsiCo India says the usual—it is a "law abiding corporate citizen and will comply with any regulations issued by the government of India, including any new labelling requirements." Nestle India did not respond to CSE's email till the magazine went to print. Sahil Sapra, brand manager of Haldiram's Nagpur division, also declined to comment.

But facts speak loud and clear: since 2013, all efforts to inform consumers through regulations have been negated and nullified. But if the stakes for industry are high, then the stakes for public health are even higher. FSSAI must acknowledge that industry's interest is not above our health and well-being. A sound and well-rounded regulation must come into effect, urgently. **DTE**

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(With inputs by Bhavya Khullar)