

Front of Package Labeling – Industry Arguments

Counter Messages and Evidence

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This front of pacakage labeling (FOPL) evidence sheet contains common opposition arguments against FOPL and effective counterarguments backed by the latest research.

Implementing front-of-package labeling (FOPL) is an effective public health response to inform the public to make healthy food and beverage decisions. To date, 10 countries¹ have enacted laws making FOPL mandatory. "High in" front-of-pack warning labels, which clearly identify products that are high in nutrients of concern (sugar, sodium, saturated fat, trans fat), are particularly effective at helping consumers quickly identify less healthy foods and increase consumer knowledge around the risks of consuming those foods and beverages. When implemented, this policy can help to guide consumers to make healthy decisions, therein helping to reverse rising rates of obesity, and in turn, helping to reduce cases of diabetes and heart disease.

KEY MESSAGES on FOPL:

- Globally, there has been an influx in the availability of ultra-processed food, especially in low- and middle-income countries. At the same time, countries have faced increased rates of diet-related diseases due to unhealthy diets.
- Nutrition labels, where they exist, are difficult to understand. Clear, evidence-based front of package label would help consumers make healthy purchasing decisions in a quick time frame.
- Growing evidence from countries with strong FOPL, like Chile, have found that these have led to a decrease in purchases of unhealthy food and a higher recognition about what foods are healthy.

INDUSTRY ARGUMENTS AGAINST FOPL & EVIDENCE TO COUNTER CLAIMS:

Industry claim #1: FOPL is not an effective solution to public health problems.

Industry claim #2: Individuals can make personal choices about what they eat, and they are responsible for their own health.

Industry claim #3a: The traffic light label is preferred by consumers.

Industry claim #3b: The GDA label type effectively informs consumers.

Industry claim #4: FOPL is trying to scare consumers from buying certain food and beverage products.

Industry claim #5: "High in" warning labels do not provide adequate information to consumers.

¹ Brazil (implementation 2022), Chile, Ecuador, Israel, Iran, Mexico, Peru, Sri Lanka, Thailand, Uruguay (implementation 2021)

Industry claim #6: Non-legal measures such as self-regulation and public education are an effective first step to addressing public health issues. Industry claim #7: FOPL violates Codex and other international trade agreements. Industry claim #8: FOPL will impact trade if different countries have different requirements.

Industry claim #1: FOPL is not an effective solution to public health problems.

The industry claims:

- "FOPL does not reduce overweight or obesity"
- There is insufficient evidence on FOPL's impact on reducing obesity.

The evidence says:

 FOPL, as implemented in several countries, have led to decreased purchases, reduced perceptions of healthfulness, and in some cases has led to reformulation of "high in" products. Consumption of these products is linked to increased obesity and diet-related diseases, thus, FOPL may help to reduce obesity and diet-related diseases.

Counter Messages:

- Numerous studies have connected diets high in added sugars, sodium, and fats, which are
 often found in ultra-processed foods, to obesity and diet-related diseases. In fact, there is
 growing literature indicating significant impacts of ultra-processed foods on most important
 dimensions of child and adult health and survival, including the association between
 consuming ultra-processed foods and obesity and cardiovascular disease.
- FOPL empowers consumers to make healthier decisions by providing clear guidance about the content of food products while reducing the public's intentions to purchase "high in" products.

- Increased consumption of (ultra) processed products, which have high levels of added sugars, sodium, saturated fats, and refined carbohydrates, has contributed significantly to the global health epidemic of overweight, obesity, and diet-related disease. [1-10]
 - Multiple studies indicate a strong association between consumption of ultra-processed foods and cardiovascular disease and all-cause mortality. [10-13]
- A systematic review of studies on FOPL types showed that "high in" FOPL, compared to no FOPL, led to significant reductions in the sugar, calorie and sodium content of food and beverage purchased. [14]
- FOPL is associated with decreased probability that a consumer will purchase sugary beverages and decreased perceptions of product healthfulness. [15-17]
 - A 2020 modeling study on the potential impact of mandatory "high in" warning labels in Mexico projected the policy may reduce obesity prevalence by 14.7%, or by 1.3 million cases over 5 years. [18] *More details can be found here: <u>English</u>, <u>Spanish</u>, <u>Portuguese</u>.*

- A 2019 study found that mandatory FOPL on sugar-sweetened beverages in the United States would reduce obesity prevalence by 3.1% in 5 years. [19]
- A 2020 study of Chile's mandatory "high in" FOPL policy found that there was a significant decrease in the proportion of products available on the market with high levels of sugars, and sodium in the first year of the policy. [20] *More details can be found here: <u>English</u>, <u>Spanish</u>, <u>Portuguese</u>.*
- A 2019 review of SSB warning labels' effectiveness found that the presence of an SSB warning label was associated with a 51% reduction in the odds of consumers choosing sugary beverages compared to sugary beverages without warning labels. The review also showed that consumers had a slight, though significant, reduction in intentions of purchasing sugar sweetened beverages with labels in comparison to a no label control. [21]

Industry claim #2: Individuals can make personal choices about what they eat, and they are responsible for their own health.

The industry claims:	The evidence says:
"FOPL is not the solution to address overweight, obesity, and diabetes. The solution is for adults and parents to make the right choices." "FOPL is not necessary. Adults and	 Consumers have trouble understanding back- of-package nutrition labels and need a simpler and more effective way to choose relatively healthier products when presented with several options.
parents can responsibly purchase and	

Counter Messages:

- Back-of-package nutrition labels are difficult for consumers to understand. Easy to understand warning labels on packaged foods and beverages would help consumers to make healthier choices.
- "High in" warning labels on packaged foods and beverages effectively discourages consumers from purchasing these products, compared to when products do not have warning labels.
- Nutrition claims (such as "100% Vitamin C), on the other hand, may make consumers believe that a product is healthy, even if it is "high in" nutrients of concern.

Counter Evidence:

• Multiple studies show current back-of-package nutrition labels are difficult for shoppers to understand. Consumers prefer simple front of package warning labels that are immediately visible and require less time to understand. [22-25]

- The Institute of Medicine Committee review of nutrition labels found consumers struggle to interpret nutrition labels correctly, regardless of reading level and mathematical ability. [23]
- Focus groups conducted with Chilean mothers found that mothers relied on FOPL while shopping for groceries, and they changed purchasing habits because of FOPL. Mothers reported that the labels, which are "high in" style, demonstrated that many products considered healthy (e.g., breakfast cereals, cereal bars, yogurts) were in fact less healthy than they thought. [26]
- A review of research from 20 countries in the Global South found consumers consistently received low scores when evaluated on their comprehension of back-ofpackage nutrition labels. Shoppers also noted they often rely on manufacturers' front of package claims as the main source of nutrition information. [24]
- A review of studies found industry-backed nutrition claims related to fats, sugar, or energy content can shape consumer's perception of healthfulness and purchase intentions. [27]
 - Consumers that saw a fruit juice with a "100% Vitamin C" label thought the beverage was healthier than those shown a bottle with no label or a "high in sugar" label. When show with the "100% Vitamin C" label, the "high in" warning label prevented perceptions of healthfulness. [17] *More details can be found here: English, Spanish, Portuguese.*
 - Unhealthy products with both nutrient claims and FOP warning labels were considered healthier than products with only warning labels. Positive nutrient claims suggesting benefits from fiber or "wholegrain" content increased consumers' intention to recommend and purchase the product, and to purchase the product for a child. [28] *More details can be found here: English, Spanish.*
- Mexico's FOPL regulation, once implemented, is estimated to prevent more than 39% of products that currently have nutrition claims from continuing to use these claims. [29]

Industry claim #3a: The traffic light label is preferred by consumers.

The industry claims:

- "The traffic light label is preferred by consumers and the colors help facilitate consumer choice and understanding."
- "Consumers prefer the UK traffic light label; it is more attractive and easier to understand. The colors help facilitate consumer choice and understanding."

The evidence says:

- Research shows that the traffic light label does not change purchase decisions and performs worse than FOPL warnings at helping consumers identify unhealthy foods.
- "High in" warning labels help consumers more quickly identify products with high contents of unhealthy nutrients compared to traffic light label, which consumers have difficulty understanding.

Counter Messages:

 Many studies have shown that the traffic light label is more confusing and is ineffective at helping consumers understand and identify products that have high contents of nutrients of concern compared to other FOPL types, like "high in" warnings.

Counter Evidence:

- Independent evaluations have demonstrated that the traffic light label does not change consumers' purchase decisions. [30 31]
 - A study of shopping habits in the UK found that there was no significant difference in the relative healthfulness (as measured by the traffic light label) of shoppers' purchases in the four weeks before and after the traffic light label was introduced. [31]
 - In Australia, researchers found the incorporation of traffic light label on a grocery store's online ordering site did not change the rates of sales of relatively healthy products, compared to having no label at all. [30]
- Consumers have difficulty understanding the traffic light label. Its use of green, amber, and red to indicate whether a product has low (green), moderate (amber) or high (red) levels of nutrients of concern is not easily understandable to consumers.
 - Two experimental studies showed that consumers' processing of traffic light label took a longer amount of time than their processing of "high in" warning labels. [32]
 - When presented with the traffic light label, consumers failed to identify products with high contents of unhealthy nutrients; consumers perceived products with "high in" warning labels as less healthy than when the same products were presented with traffic light labels. [32]
 - Qualitative research in Mexico found that traffic light labels confused consumers; they found the multiple colors difficult to compare across products and the amber/intermediate color particularly hard to interpret as an indicator of product healthfulness. The traffic light label and GDA were the least understandable and consumer-friendly type of FOPL due to overall lack of comprehension of nutrition information. [33]
- A study of adults in Brazil found "high in" warning labels improved consumers' ability to identify healthier products and increased their ability to understand whether excess nutrients of concern were found in a product. "High in" warning labels also increased consumers' intentions to purchase healthier products by 16%, whereas the traffic light label increased intentions by 10% compared to no label. [34]
 - Another study of 2,400 Brazilian adults found that "high in" warning labels, compared to no labels and traffic light labels, were significantly better at improving consumer's understanding of nutritional content and reducing perception of healthfulness and intention to buy foods with high content of sugars, saturated fats, and sodium. [35]

Industry claim #3b: The GDA label type effectively informs consumers.

The industry claims:

- "GDA labels effectively inform consumers about nutrient content."
- "Many food companies are already informing consumers about nutrient content with Guidelines for Daily Amounts (GDA) labels. This is a familiar labeling system for consumers and introducing something new would cause confusion."

The evidence says:

- GDAs are difficult to understand and have not proven effective in encouraging consumers to make healthier choices.
- Research shows they are among the least impactful FOPL types used globally.

Counter Messages:

- Multiple studies have shown that GDA is a less effective labeling system compared to other systems including "high in" front of package warning labels, traffic light labels, and NutriScore (also known as the 5 Color Nutrition Label).
- The GDA system, which includes hard to understand numbers, is the least effective labeling system. Multiple studies have found that they are confusing and do not help consumers make healthier food choices. It's no wonder the food industry prefers and promotes this model.

- Multiple non-industry funded studies comparing GDAs other systems (traffic light labels, NutriScore, the positive Choices International, HealthStar Rating), show that GDAs are less effective in encouraging consumers to make healthier choices. [36-38]
- A study of adults in Mexico found that in a virtual shopping scenario, shoppers who were shown the traffic light label or "high in" warning labels improved the nutritional quality of purchases and led to reduced time when shopping compared to when the GDA was used.
 [38]
- Consumers are less successful in understanding GDA compared to other labeling approaches. Two studies have shown that consumers require more time to assess and understand GDAs compared to traffic light label, nutrition facts panel, and a front of package "choices" logo. [39 40]
 - A study using eye-tracking technology found that GDA labels are less effective at getting consumers' attention and thus are less able to help consumers identify whether a product is unhealthy compared to "high in" warning labels. [41]
 - A study among nutrition students in Mexico found that even this population with specialized training had trouble comprehending the GDAs. When shown the GDA, only 31.7% could correctly identify the caloric content of the product. [42]
 - Qualitative research in Mexico found that GDA and traffic light label were the least understandable and consumer-friendly type of FOPL due to overall lack of comprehension of nutrition information. [33]

GDAs have not proven to help consumers reduce consumption of unhealthy products. A study of consumer purchases before and after the GDA label was implemented in the UK showed there was no generalizable change in purchases of healthy or unhealthy foods once the label was introduced. [43]

Industry claim #4: FOPL is trying to scare consumers from buying certain food and beverage products.

	The industry claims:	The evidence says:
•	"High in" warning labels are too harsh and will make consumers anxious.	 "High in" warning labels are evidence-based and easy to identify. Consumers do not find "high in" warning labels to be harsh.

Counter Messages:

• "High in" warning labels provide consumers with simple, easy to understand, and accurate information about food and beverage products; empowering consumers to make informed decisions while grocery shopping or selecting foods and beverages to eat or drink.

Counter Evidence:

- An independent study in Canada comparing different FOPL designs including text only, a stop sign and a triangle. 88% of respondents indicated that the symbols were "about right" or "not harsh enough" when asked to evaluate the degree of harshness. [44]
- When tested in a sample of Mexican consumers, "high in" warning labels were easily identifiable because of their size and color. [45]

Industry claim #5: "High in" warning labels do not provide adequate information to consumers.

The industry claims:

- "'High in' warning labels do not provide enough information to inform consumers on the health benefits of foods. These types of warnings unfairly label certain foods."
- "'High in' warning labels (e.g., triangle and stop sign) don't provide consumers with enough information to choose "healthy foods," they only show consumers which foods are unhealthy."

The evidence says:

- When compared to other labeling systems,
 "high in" warning labels have proven to help consumers make informed choices about healthy and unhealthy foods.
- Positive nutrition claims can undermine warning labels and make it more challenging for consumers to identify unhealthy food.

• "We have reformulated our products
to make them healthier, adding whole
grains, however, our products still
bear warning label."[46]

Counter Messages:

- "High in" warning labels provide information that help consumers clearly and accurately identify products that are high in sugar, fats and sodium. Consumers use this information to make informed choices about what foods and beverages to purchase, compared to traditional nutritional labeling, the GDA, and the traffic light label.
- Labels that present positive claims (such as a 100% juice claim) about a product that is high in nutrients of concern often mislead people into thinking that those products are healthier than they actually are.
- Front of package warning labels target specific nutrients that are drivers of unhealthy diets when consumed in excess– including sodium, sugar and fats.

- A review of FOPL experimental studies found that "high in" warning labels helped consumers identify both the relatively unhealthy products (high in nutrients of concern) compared to no label and the relatively healthy products compared to the traffic light label or no label. [47]
 - A study of adults in Brazil found "high in" warning labels improved consumers' ability to identify healthier products and increased their ability to understand whether excess nutrients of concern were found in a product. "High in" warning labels also increased consumers' intentions to purchase healthier products by 16%, whereas traffic light labels increased intentions by 10% compared to no label. [34]
 - A study of Colombian adults found that when given the choice of two fruit drinks, warning labels led to a higher percentage of participants who identified which fruit drink was higher in sugar (77% 83%) compared to the control (32%), and reduced participants' intent to purchase those products (21% 24%) compared to the control (54%). [48] *More details can be found here: <u>English, Spanish.</u>*
- Studies evaluating the first year of Chile's Law of Food Labeling and Advertising have shown success in changing consumers' purchasing and consumption behaviors.
 - Focus groups conducted with Chilean mothers found that mothers relied on FOPL while shopping for groceries, and they changed purchasing habits because of FOPLs. Mothers reported that the labels, which are "high in" style, demonstrated that many products considered healthy (e.g., breakfast cereals, cereal bars, yogurts) were in fact less healthy than they thought. [26]
 - After the implementation of the comprehensive Chilean food policy, including "high in" stop sign warning labels, purchases of beverages high in sugar, sodium, or saturated fat fell by 23.7% by volume (-22.8 mL per person per day). [49] *More details can be found here: <u>English.</u>*

- Research testing salience of various "high in" warning label styles found that respondents
 were more likely to correctly identify products high in nutrients of concern when shown a
 symbol incorporating the text "high in." Intuitive warning signals (a stop sign and triangle +
 exclamation mark) were found to be the most effective symbols to inform consumers that a
 product is high in saturated fat and sugar. [50]
- U.S. adults who saw "high in" warning labels on fruit juice perceived it to be less healthy and were less interested in drinking the product. The "high in" warning label prevented perceptions of healthfulness even when a "100% Vitamin C" label was also shown on the product. [17] *More details can be found here: <u>English, Spanish, Portuguese.</u>*
- Research on positive nutrition claims on product labels shows that these claims can reduce the efficacy of FOPL warnings and make it more difficult for consumers to correctly identify healthy or unhealthy products.
 - A study of adults in Canada found that voluntary, positive nutrition claims on a product label (such as a "reduced sodium" claim) can influence a consumer's understanding of mandatory FOP "high in" warnings. When a product label featured a "reduced claim" for the same nutrient that is labelled as "high," consumers were significantly less likely to correctly identify the product as high in the nutrient of concern. [51]
 - A study on nutritional warnings and claims on foods frequently consumed in Brazil found that products featuring positive nutrition claims (such as "rich in zinc" or "source of fiber") were perceived as more healthful than products without these claims. This study also found that nutrition warnings can help consumers identify unhealthy products and override the positive healthfulness created by nutrition claims. [52]

Industry claim #6: Non-legal measures such as self-regulation and public education are an effective first step to addressing public health issues.

 "We are providing additional, alternative solutions to the NCD epidemic that are more effective than implementing FOPL." [46] "We support all training, education and information programmes aimed at improving the dietary habits of the Self-regulation activities often lead to lack of compliance because they are not mandatory. Compulsory measures are more effective. Industry created self-regulation standards for labeling are often vague and use less effective FOPL systems, such as GDA. 	The industry claims:	The evidence says:
 population." "'High in' warning labels are not the least burdensome measure possible. Alternative measures can be used." 	 "We are providing additional, alternative solutions to the NCD epidemic that are more effective than implementing FOPL." [46] "We support all training, education and information programmes aimed at improving the dietary habits of the population." "'High in' warning labels are not the least burdensome measure possible. Alternative measures can be used." 	 Self-regulation activities often lead to lack of compliance because they are not mandatory. Compulsory measures are more effective. Industry created self-regulation standards for labeling are often vague and use less effective FOPL systems, such as GDA.

Counter Messages:

- Compared to government regulations, industry self-regulations are weakly implemented, lacking enforcement and penalties strong enough to ensure compliance, and are not necessarily based in credible evidence.
- Industry groups and companies benefit from self-regulation as a public relations tool signaling corporate social responsibility and positioning themselves as "part of the solution" while also avoiding or delaying more strict and effective mandatory solutions by governments.
- Education campaigns should not be considered alternatives to mandatory regulations, such as FOPL, to improve public health. Based on evidence from industry self-regulation activities (related to labeling and marketing), education campaigns are unlikely to be effective or adhered to without government regulation.

- A 2014 literature review of food industry attempts at nutrition labeling and marketing found that self-regulation efforts are ineffective. Industry commitments tend to be relatively vague. Therefore, stronger tools, like government regulation, are needed to regulate the industry. [53]
- Industry pledges to restrict marketing to children prescribe weak marketing restrictions and have not successfully protected children from junk food marketing.
 - A study assessing child-oriented marketing by companies participating in the Children's Food and Beverage Advertising Initiative (CFBAI, an industry self-regulation program in the United States and Canada) found companies were able to reduce a product's serving size in order to meet the nutrition criteria set by the initiative and continue their childdirected marketing without addressing nutrients of concern in their products. [54]
 - A study comparing CFBAI nutrition criteria to the WHO European nutrient profile model found 85% of the foods and beverages allowed to be marketing to children under CFBAI could not be marketed to children under the WHO's nutrient profile model. [55]
 - A study of Canada's CFBAI found nearly 100% of the TV ads from companies participating in the initiative featured products deemed excessing in either sodium, sugars, or fats according to the Pan-American Health Organization nutrient profile model. [56]
- Industry commitments to reduce unhealthy nutrients, such as sodium, fats, and sugar, from their products (also known as reformulation) often result in only slight improvements, and even setbacks in public health progress.
 - In 2011, the United Kingdom launched the Public Health Responsibility Deal (RD), a public-private partnership that aimed to bring together government and private companies, to commit to addressing certain public health issues, including reformulating or introducing healthier products or encouraging the consumption of fruits and vegetables. This deal was found to be largely ineffective at addressing food issues. [57-59]
 - The RD gave food companies greater freedom to set and monitor targets for salt intake, superseding a previous strategy to reduce salt intake set by the Food

Standards Agency (FSA). A 2019 evaluation of RD found that it actually contributed to an additional 9,900 cases of cardiovascular diseases and 1,500 cases of gastric cancer from 2011 to 2018 because it significantly slowed progress made to reduce sodium intake by the FSA. [57]

- When adopting a voluntary labeling system, food and beverage companies often use the GDA system. Studies evaluating the effectiveness of industry self-regulation of labeling have found these systems to result in poor implementation by companies.
 - The Australian food industry adopted a voluntary FOPL system in 2006. Companies use a Daily Intake Guide system (DIG, which is very similar to GDA). An independent audit of DIG labelling usage on energy-dense nutrient-poor (ENDP) snacks found that while 66% of these products displayed FOPL, most (74%) of these products did not display saturated fat and sugar contents, a practice which disobeyed the industry's own commitment for implementing DIG. [60]
- The tobacco industry made similar arguments to the food industry in support of voluntary
 education campaigns as an alternative measure to mandatory labeling regulations, arguing
 that education was a less trade restrictive measure. The courts responded by saying that
 education could be used as a complementary measure and does not have to be viewed as
 an alternative measure.[61]
 - This indicates that voluntary education campaigns should not be used as an alternative measure to mandatory evidence-based policies, such as labeling. Rather, a comprehensive suite of measures working together may be the most effective approaching to achieve desired public health outcomes. [62 63]
 - Early analysis of the implementation of a package of healthy food policies in Chile, including FOPL, restrictions to child-directed marketing, and banning sales of unhealthy foods in schools, provides early evidence that a comprehensive package of policies may be a more effective approach to impact unhealthy food purchases and dietary intake.[62]

Industry claim #7: FOPL violates Codex and other international trade agreements.

	The industry claims:		The evidence says:
•	"FOPL are not allowed by Codex, does not align with Codex or countries should wait until Codex developed FOPL guidelines."	•	FOPL do not violate Codex. Codex does not address FOPL and does not prevent countries from adopting evidence based FOPL measures.

Counter Messages:

- Codex Alimentarius does not currently have any guidelines for FOPL. It is not necessary for countries to wait until the Codex Commission develops guidelines to proceed with FOPL policies.
- While Codex regulations/guidelines do not strictly bind governments, they can allow for the industry to challenge measures that differ from guidelines and are referenced in various World Trade Organization (WTO) agreements. However, there are currently no guidelines that would preclude a country from moving forward with a strong FOPL measure.

More information:

- Codex is an intergovernmental body that establishes international food standards, guidelines, and other recommendations. Together, these documents make up the Codex Alimentarius. The World Health Organization and the Food and Agriculture Organization established Codex and its two core mandates: to protect the public health and to facilitate harmonization in international trade. One key area of Codex's work is supporting the harmonization of laws and regulations around food.
 - The Codex Commission sets international food standards that serve as a guideline for packaging and food safety. Codex instruments currently include standards on back-ofpackage nutrition labels, guidelines on health claims, food supplements and infant formula.
- In 2012, the Codex Commission recommended that nutrient declarations be mandatory on packaged food. [64]
- A Codex committee (electronic working group) is working on developing guidance for FOPL. [65]
- The major trade agreements used by the Caribbean Community (CARICOM), including the CARICOM Single Market and Economy, the CARIFORUM-EU Economic Partnerships Agreement, and the WTO Agreements, contain exception clauses which allow for "trade-inconsistent" action for public health reasons. These clauses allow some opportunity to address public health concerns, including through FOPL. [66]

Industry claim #8: FOPL will impact trade if different countries have different requirements.

The industry claims:The evidence says:• "FOPL is trade restrictive because it is costly and time consuming to implement."• Companies are able to change their packaging at will, and already do so for different countries and markets.For more information on trade arguments and trade restrictiveness, see the "Front of pack labeling – preparing for and• Markets Poster to serve any server ments in healthcare		
 "FOPL is trade restrictive because it is costly and time consuming to implement." Companies are able to change their packaging at will, and already do so for different countries and markets. Where costs are an issue, stickers can be allowed. Any costs incurred by the company have the packaging – preparing for and 	The industry claims:	The evidence says:
responding to international trade law arguments" factsheet linked below.	 "FOPL is trade restrictive because it is costly and time consuming to implement." For more information on trade arguments and trade restrictiveness, see the "Front of pack labeling – preparing for and responding to international trade law arguments" factsheet linked below. 	 Companies are able to change their packaging at will, and already do so for different countries and markets. Where costs are an issue, stickers can be allowed. Any costs incurred by the company have the potential to save governments in healthcare costs.

More information:

- Manufacturers have exhibited that they are able to change packaging at will.
 - For example, in response to COVID-19, food companies were able to quickly change packaging and logos. [67]
- Costs incurred by the industry in implementing FOPL will be outweighed by the public health gains and healthcare savings. Where costs are an issue, for example, to avoid incurring a cost of relabeling already packaged products, stickers can be allowed. [68]
 - A 2019 study found that mandatory FOPL on sugar-sweetened beverages in the United States would reduce obesity prevalence by 3.1% in 5 years. [19]
 - A 2020 modeling study from Mexico showed that FOPL could prevent 1.3 million cases of obesity (a 14.7% reduction in prevalence) and save \$1.8 billion USD (\$1.1 billion in healthcare costs and \$742 million in indirect costs). [18] *More details can be found here: English, Spanish, Portuguese.*

For more information on trade arguments and other legal against FOPL, please consult the factsheet: <u>Front-of-package labeling – preparing for and responding to international</u> <u>trade law arguments</u> and/or reach out to the GHAI legal team.

For more information on front of package warning labels, please consult the following resources:

- Resources page from the Global Food Research Program at the University of North Carolina, Chapel Hill
 - Map of Front of Package Labeling around the world
 - Fact sheet: Front of Package Labeling: Empowering Consumers to Make Healthy Choices (English)
- Research alerts created by the Food Policy Program at the Global Health Advocacy Incubator
 - No negative economic impact from Chile's food policy law jobs and wages not reduced (<u>English</u>, <u>Spanish</u>)
 - Octagonal warning labels most effective at discouraging ultra-processed food consumption in Colombia (<u>English, Spanish</u>)
 - Postive nutrient claims on packages mislead consumers into thinking products are healthier than they are (English, Spanish)
 - Front of package warning labels would be effective in discouraging consumption of unhealthy foods in Colombia; octagonal warning labels most effective (English, Spanish)
 - Food and Beverages Eligible for Front of Pack Warning Labels in Brazil are Contingent on the Nutrient Profile Model Adopted (English, Spanish, Portuguese)
 - Label graphics influence consumer attitudes about sweetened fruit beverages (English, Spanish, Portuguese)

- First study of its kind shows front of package warning labels on unhealthy foods in Mexico could prevent 1.3 million cases of obesity and save US\$1.8 billion (English, Spanish, Portuguese)
- Chilean food and beverage law led to fewer foods and beverages with high levels of unhealth nutrients (English, Spanish, Portuguese)
- Comprehensive Chilean policy package significantly reduced purchases of sugary beverages (English)
- New study finds that most Colombian packages food would require health warning labels (English)

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