



PVCHR: Against Caste System &lt;pvchr.india@gmail.com&gt;

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**Subject: case number 4227/90/0/2021.**

1 message

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**Dr. Lenin Raghuvanshi** <lenin@pvchr.asia>

Tue, Apr 5, 2022 at 11:03 AM

To: "cr.nhrc" &lt;cr.nhrc@nic.in&gt;

Cc: js-nhrc &lt;js-nhrc@nic.in&gt;, NHRC &lt;ionhrc@nic.in&gt;, NHRC - Sec General &lt;sgnhrc@nic.in&gt;, "NHRC-Director General (Investigation) - Smt. Kanwaljit Deol, IPS" &lt;dg-nhrc@nic.in&gt;

Bcc: pvchr.india@gmail.com

April 05, 2022

**To,**  
**Respected Chairperson and members**  
**National Human Rights Commission (NHRC)**  
**New Delhi.**

Subject: Recommendation for Mandatory and interpretive Front of Package Labeling (FoPL) regulation to address rising obesity among children and youths.

**Respected Sirs and Madams,**

At the onset, I would like to extend my heartfelt congratulations for taking extraordinary steps to intervene for better health of children, mothers and youths as **case number 4227/90/0/2021**.

Continuing on the health issue of our children in the country, I would like to bring to your notice about the rising case of obesity and cardio-vascular related diseases among children and youths; and the role of ultra-processed packaged food in accelerating these diseases. There is a wealth of evidence showing that foods and beverages providing energy are high in added sugar, sodium, saturated fat which are referred to as nutrients of concern is one of the key causes of obesity and increased risk of cancer, heart disease, stroke, Type 2 diabetes and premature death including among children and youths.

As you know, in our country, India, undernutrition and obesity co-exist as a classic case of double burden of Malnutrition. India is home to around 15 million obese children. This is the second largest number after our neighbor, China. On average, 15 % of our children are facing some form of obesity. On the other hand, more than 45 million children in our country are stunted or under-growth, which is a third of the world's total stunted children <sup>[1]</sup>. Nearly half of all under-5 child mortality in India is attributable to undernutrition. Both undernutrition and overnutrition are triggered by unhealthy food choices and diets, dominated by unregulated ultra-processed foods and drinks, which lack nutrients but are dense in fat and calories <sup>[2] [3]</sup>.

Since the objective of the FoPL regulation considered by FSSAI under guidance of Ministry of Health & Family Welfare is to better inform consumers in a simple, convenient and easy to interpret manner about the content of sugar, sodium and saturated fat and to discourage the purchase of unhealthy packaged food, it is important that such regulation should be mandatory, follow best & proven global best practices and based on global accepted standards. It is important from this fact

also that our food processing industry is becoming global and we shouldn't lose our stake in the international market or be unable to export in an important foreign market just because we didn't follow proven and accepted international norms.

Given that FoPL regulation is important policy tool to address rising obesity and cardio-vascular diseases among children and youths triggered by unhealthy food choices and diets, dominated by unregulated ultra-processed foods and drinks, I suggest following recommendation for your kind consideration:

1. The FoPL regulation must be a mandatory in nature and applies to all packaged food products because given the diversity of food habits across the country and multiplicity & diversity of food manufacturers in India as well as need to promote export of India-made processed food products in international market, the voluntary system of FoPL may not be in best interest of all stakeholders including food industry.
2. The Label design on the front of the food packet to depict information about nutrient of concerns in the given products to the consumer should Warning Labels because compare to Health Star Rating (HSR), the Warning symbol is interpretative, simplistic and readily visible with established size limits for all types of packaging. Further, in simple formats, colors and icons, the warning symbol can suggest Consumer **"High In" Fat, Sugar or Salt label**.
3. The FoPL regulation must be guided by a strong nutrient profile model, as suggested by World Health Organization -South East Asia Regional Office (WHO-SEARO), for India, which defines the products that are subject to the FoPL regulation.
4. Labels should only highlight nutrients of concern; no positive seals, or positive labels should be a part of this policy. FoPL should be implemented alongside restrictions on health and nutrition claims.

I am sure in the best interest of the public health of our country, your intervention of honorable full commission for the Strong and Effective FoPL which is based on scientific temper, follows proven global best practices and country's health and nutrition needs. As a strong supporter of Healthy and Fit India, I firmly believe that your quick action in this regard will leapfrog India, set the Indian example on the Global health and nutrition map and set precedence for other countries to follow.

Thanking you,

Yours faithfully,

**Lenin Raghuvanshi**

**Ex Member, NGO Core Committee, NHRC**

**2007 Gwangju Human Rights Awardee**

**2010 the International Human Rights awardee of the city of [Weimar](#)**

**2016 M A Thomas National Human Rights Awardee**

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[1] <https://www.intechopen.com/chapters/71300>

[2] DeFrank JT, Rimer BK, Gierisch JM, Bowling JM, Farrell D, Skinner CS. Impact of mailed and automated telephone reminders on receipt of repeat mammograms: A randomized controlled trial. Am J Prev Med. 2009;36(6):459-467.

[3] NHANES [https://www.cdc.gov/nchs/nhanes/2011-2012/fsq\\_g.htm](https://www.cdc.gov/nchs/nhanes/2011-2012/fsq_g.htm)



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