

Labelling: The Road Ahead:

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When you chose to drive to your holiday destination, apart from enjoying the countryside you constantly look for milestones – Pune 168km. These simple words tell you a lot – you are in the right direction, how far away you are or an estimation of time of arrival or the need for a pit stop – spot of lunch, cup of coffee or fill of gas. This is labelling – simple, informative and derivative. The purpose of any labelling exercise should be the same – destination, direction, and derivative.

Recent spate of labelling rules, variously known as GSR 694, 491, 380 debated over two and half years apparently suggest that both destination and derivations are unclear within stakeholder groups. It isn't the point that rulemaking is taking too much time – the lesson to be learned is that rules should be first understood and then notified. The reverse is eminently avoidable.

Mists of the past must lift.

From early days consumers bought foods in packaged forms with no labels – they still do from corner shops where foods are assembled, wrapped and delivered. Customers see the food before being packed and so it only had to be of 'the nature and substance or quality' demanded by the purchaser. It was just weighed out, wrapped and price delivered. Early legislation largely enacted during the war period focused on protecting the consumer in difficult times where adulteration - that is 'not being of the nature or substance or quality' - would be rampant without controls. 'Adulterated' later on took another extended connotation; apart from being 'not of the nature or substance or quality – it implied that other substances added to foods such as colors were meant to conceal or 'hide damage or inferiority' – all this happened a 100 years ago with reminiscent labelling still occurring today – 'CONTAINS PERMITTED COLOURS AND FLAVOURS – why the bold script?

Science and sensory appeal in terms of taste, texture, colour, flavour is now the way forward for consumers choosing foods and food industry product development. The past should not haunt the future

Labelling: from Compositional to Proprietary Foods

Arising from a situational need for compositional standards, two restrictive practices emerged that later became the pivot of much legislative behaviour:

1. Any food that used a particular name e.g. 'Jam, or fruit nectar' etc, had to comply with the specified criteria of the compositional standard. In short the product name was reserved.
2. Another option was to require any food which resembled the appearance of a controlled product like jam for instance that product would have to comply with the specified criteria and name. This was more restrictive.

The first option allowed manufacturers to prepare foods resembling the controlled product but under a different product name so long as the product label made information available to the consumer.

We now know these foods as 'non-standardized' foods or proprietary foods, often interpreted with disparagement. The interpretation is based on the invalid presumption that 'standardized' products are necessary to ensure quality. Product quality is a separate entity and unrelated to the existence or nonexistence of a compositional standard.

For example yoghurt has never had a compositional standard worldwide – yet a variety of such products are available on market shelves of perfectly good quality. Alternatively margarine which has a compositional standard may be of substandard quality due to microbiological or sensorial defects. Products in the unstandardized sector are equal in quality to standardized products and legislative postures should be based on facts rather than feeling.

Where regulations provide safe food with appropriate labelling for informed choice the regulators interference in product formulation is least productive and benefits none. If consumer choice is to expand then compositional inspections are virtually impossible in the market place. Witness the thousands of "unstandardized products" on supermarket shelves made from a variety of ingredients or food additives currently recognized as safe for use. It is unimaginative what kind of infrastructure one would require to sample and test equitably, if all of them were subjected to compositional standards. When inspections cannot cope with the plethora of products they become selective.

Compositional standards restrict innovation, consumer choice and represent an ancient form of food regulation. Codex Alimentarius Commission corrected its position early 1990 when it concluded that enough work had been devoted to commodity standardization and resources should be better devoted to horizontal activities such as labelling, food additives, food hygiene, nutrition, export import.

Labelling rules – the Gear Shift: With the need for compositional standards reducing over time consumer protection relied on the ability of a consumer to choose a product based on labeling information. The label has now become the preferred method of consumer protection liberating products from restrictive specifications. Although free to produce many different products, manufacturers are however now required to meet a complex set of labeling controls.

Products in EU – a market of 27 countries where product standards differ between countries would require a mechanism to keep the consumer informed and yet not impose on country sovereignty to maintain domestic standards. Quantitative ingredient labelling eminently provides such a mechanism for neighborhood trade as well as proprietary foods to flourish. Further locally produced proprietary foods where product names do not reveal the expected ingredient would under quantitative ingredient labelling [QUID] provide consumers with the information.

Nutrition Labels – is the consumer being served.

Nutritional labelling requires nutrients present in the food to be numerically labelled so that consumers are able to choose foods on its nutrient content. This is information – but is this information being used to drive a certain preferred or intended behaviour?

One of the major objectives that governments world wide are pushing their populations to achieve is balancing intakes of protein, fat, carbohydrates and total calories. While Industry is charged with the task of carrying information to the consumer – other stakeholders are woefully short on playing an equitable role in educating consumers on what is balanced nutrition. Who will educate the consumer while industry informs them through labelling?

The second objective of nutritional labelling is to make significant impact on consumer health through declarations of certain nutrients such as polyunsaturated fatty acids, omega-3, fiber, or saturated fatty acids, trans fats, cholesterol, sodium etc. These nutrient declarations follow the stated health policy objectives of the country and labelling provides positive or avoidance choices. For example the US has determined that amounts of fat calories, cholesterol, sodium, saturated and now trans fats consumed through prepackaged foods can impact consumer health through such label declarations. The Center for Food Safety and Nutrition [CFSAN] of the US FDA estimates that the daily intake of *trans* fat by Americans is about 5.8g per day and labeling of food packages would annually prevent from 600 to 1,200 heart attacks and save 250-500 lives. Based on this estimate, this rule will realize a cost savings of \$900 million to \$1.8 billion per year in medical costs, lost productivity, and pain and suffering.

Preceding nutritional labelling governments should widely publicize food based dietary guidelines to educate consumers on how to read food packages. This is well explained and illustrated in scientific booklets published by the Indian Council of Medical Research – but unfortunately lies within the limited reading domain of nutritionists and food scientist. A good example is the widely referred to Food Pyramid or the American guidelines of food intakes relating to fat, saturated fat, cholesterol, sodium etc.

Food labelling rules emerge from national policies, community obligations or immediate and impending concerns. When policy is unclear or unstated stakeholder consultations become divergent with tenuous position holding and often leaves one with the feeling that Indian regulations emerge from an impatient desire to catch up with international norms and not from domestic realities

National governments are the most trustworthy source of information for consumers' health. When regulatory intent is enforcement centric legislative behaviour becomes enforcement driven though ostensibly masquerading as consumer concerns. If regulatory intent is in fact concern for consumer health then consumer education should precede consumer information if the latter is to make a beneficial impact. Like road signs – reducing lifestyle risk factors should be the destination; nutrition labelling one of the directions and wise consumer choices the derivations.

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