

May 16, 2019

To:

Mr. Luiz Henrique Mandetta – Minister of Health
Mr. Alex Machado Campos – Head of Minister of Health Office
Mr. João Gabbardo dos Reis – Executive Secretary/Ministry of Health
Mr. Francisco de Assis Figueiredo – Secretary/SAS/Ministry of Health
Mr. Erno Harzheim – Secretary/SGEP/Ministry of Health
Mr. Wanderson Kleber – Secretary/SVS/Ministry of Health
Mr. Denizar Vianna – Secretary/SCTIE/ Ministry of Health
Ms. Michele Lessa de Oliveira – CGAN/Ministry of Health
Ms. Thaisa Gois Farias de Moura Santos Lima - International Affairs Office/Ministry of Health

CC:

Mr. William Dib – President-director/DIMON
Ms. Alessandra Bastos Soares – Director/DIARE
Mr. Renato Alencar Porto – Director/DIREG
Mr. Fernando Mendes Garcia Neto – Director DSNVS/DIGES
Ms. Thalita Antony de Souza Lima – GGALI/ANVISA
Mr. Nelio Cezar de Aquino – GEREG/ANVISA
Ms. Patricia O. Pereira Tagliari – AINTE/ANVISA

Dear Mr. Luiz Henrique Mandetta:

It is with great expectations that we, leading researchers and organizations in global health, have followed the regulatory process for the revision of front-of-package (FOP) food labelling rules in Brazil. Brazil plays an influential and leadership role in the region, particularly in the area of protecting the public health; policies enacted in Brazil have the power to not only protect and save lives of the Brazilian population but also to positively influence other countries to adopt effective life-saving regulations.

Since 2014, Anvisa has led the process to review current food labeling standards in Brazil. We were honoured to contribute at Anvisa's technical public consultation (Tomada Pública de Subsídios) in 2018, providing the best evidence and updated research to assist your regulatory agency to fulfill its mission to protect the public health.

However, we write to express our concerns with respect to your statements made to *CBN Radio*¹ in favor of the adoption of an informative front of package label, with no warnings or colors, similar to the Italian model. We would like to reinforce that consensus exists among leading global health researchers and in scientific evidence that has been conducted free from any conflicts of interest that the GDA is less effective than front of package (FOP) warning labels in informing consumers of the nutritional quality of packaged products. Based on this evidence, countries like Canada, Israel, Chile, Peru and Uruguay adopted FOP warning labels.

A 2017 study comparing FOP warning labels to the industry-endorsed guidelines for daily amounts (GDA) and traffic-light label systems found that FOP warning labels were better able to help consumers correctly identify products with high content of unhealthy nutrients and that consumers perceived products bearing warning labels as less healthy than the same products featuring GDA or traffic-light labels². Another 2017 study comparing children's perceptions of food products with warning labels vs. traffic-light label found that warning labels had greater relative impact on children's food choices compared to the traffic-light system³.

In Brazil, a randomized controlled experiment (using each participant as their own control) with 1,607 online participants (representative of the Brazilian population in age, education, sex, socio-economic class and geographic region) compared warning labels (triangle format) to the traffic-light model (GDA with colors) and included a no-label control in each study arm. The study, conducted by the Brazilian Institute for Consumer's Defense (Idec), researchers from the Federal University of Paraná (UFPR), and the Center for Epidemiological Studies in Health and Nutrition at the School of Public Health, University of São Paulo (Núcleo de Pesquisas Epidemiológicas em Nutrição em Saúde/Universidade de São Paulo), found that compared to no label, warning labels influenced consumer perceptions of nutritional quality of a product to a greater extent than the traffic-light labels. The warning labels format performed better than the traffic-light model in multiple ways, including: (1) capturing consumer attention; (2) are easier to understand; (3) are more useful at point-of-purchase; (4) reduce the perception of healthiness of the unhealthy products; and (5) reduce the intention to purchase unhealthy products⁴.

Based on research and clear results from research on the Brazilian population, Idec and the Federal University of Paraná (UFPR) presented the Brazilian model of FOP warning labels (the triangle model) to the National Health Surveillance Agency (Anvisa) as the best option to protect the public health. This model has overwhelming support from both the Brazilian citizens and the public health scientific community. The triangle model was based on the Chilean warning FOP labels and adapted by experts on information design for the Brazilian context according to international standards on warning communication.

The Global Food Research Program of the University of North Carolina in collaboration with the Institute of Nutrition and Food Technology (INTA), University of Chile will publish in mid to late 2019 a series of papers which will highlight the impact of the Chilean FOP warning labels in successfully getting people to shift toward healthier food purchasing patterns while showing major reformulation of foods and beverages toward healthier products. This work will highlight the way consumers shift toward healthier packaged food products while having minimal impact on total volume of product sales (and thus minimal impact on employment).

A new clinical random controlled trial run by the eminent U.S. National Institutes of Health team lead by Kevin Hall recently added a major new evidence demonstrating the need to reduce ultra-processed food consumption to prevent obesity⁵. This study showed that shifting from a normal real food-based diet in normal weight individuals to one composed of ultra-processed foods was linked in just two weeks with a 1.1kg weight gain. This suggests that Brazil, where purchases of ultra-processed foods is rapidly increasing, could see excessive weight gain linked with consumption of these products.

The science is clear on the role of foods and beverages high in energy, added sugar, sodium, and saturated fat on health: excessive consumption of these unhealthy foods and beverages is one of the key causes of obesity and its related diseases. We therefore strongly support the use of FOP warning labels as a critical measure to inform consumers, curb consumption of these unhealthy food products, and address these issues.

In this regard, we recommend the adoption of a FOP warning label system based on a strong nutrient profiling model as a crucial step towards ensuring consumers to have adequate knowledge to make healthier decisions about purchase and consumption of foods and beverages. Obesity, diabetes, and related non-communicable diseases are multi-factorial, complex diseases that will require a package of policy actions. While front-of-package labeling will not solve these health problems on their own, they are a necessary and critical step in the right direction to creating a healthier food supply and providing consumers with the information they need to make healthy choices. We support the recommendation from the Pan-American Health Organization that countries in the region adopt the FOP warning label.

The evidence is clear; we invite the Brazilian Minister of Health to take swift action to support the adoption the FOP warning label proposed by Idec/UFPR, which enjoys strong support from the national and international scientific community and the Brazilian population, and benefits from clear scientific evidence that FOP labels work to help consumers make informed choices about the foods and beverages they are consuming. Taking such action will place Brazil as a model for the region and the world, joining a growing momentum of countries that have shown strong leadership in protecting the public health of their citizens.

Sincerely,

Signatures on next page

¹Available at: < <http://cbn.globoradio.globo.com/media/audio/259302/ministerio-da-saude-quer-ate-o-fim-do-ano-novo-rot.htm> >.

²Arrúa A, Machín L, Curutchet MR, et al. Warnings as a directive front-of-pack nutrition labelling scheme: comparison with the Guideline Daily Amount and traffic-light systems. *Public Health Nutrition* 2017; 20(13):2308-17.

³Arrúa A, Curutchet MR, Rey N, et al. Impact of front-of-pack nutrition information and label design on children's choice of two snack foods: Comparison of warnings and the traffic-light system. *Appetite* 2017; 116:139-46.

⁴Khandpur N, et al. Are front-of-package warning labels more effective at communicating nutrition information than traffic-light labels? A randomized controlled experiment in a Brazilian sample. *Nutrients* 2018; 10(6), 688.

⁵Hall, K. D. Ultra-processed diets cause excess calorie intake and weight gain: A one-month inpatient randomized controlled trial of ad libitum food intake. *Cell Metabolism* 2019; 30:1-10.
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