With the increasing epidemic of overweight and obesity, consumer’s attitudes and awareness towards the nutritional aspect of the foods are increasing rapidly. In this context, nutrition content labels play a significant role in providing consumers with nutrition information which may influence purchase decisions. In order to improve consumer understanding of nutrient content of food products, WHO is advocating for Member States to implement comprehensive nutrition content labelling as directed by the recent codex guidance. Despite the increasing provision of nutrition information on food products, various factors including lack of time and comprehension difficulties prevent people from making use of this information. Therefore, WHO recommends communicating nutrition information by means of front-of-pack labelling as a tool to combat unhealthy food choices and improve public health. An effective FoPL is one that helps consumers distinguish between healthier and less healthy products and the different FoPLs have varying capacity to achieve this outcome.

With the increase in volume of processed, pre-packaged foods entering Asian and Pacific markets, countries in South-East Asia Region were in need of technical support to implement labelling policies. This report is the result of a three-day Regional workshop on nutrition labelling held in April 2018, to promote healthy diets. The meeting was organized as a collaborative effort between the Nutrition and Health for Development Unit, WHO HQ, and the Regional Offices of South-East Asia (SEAR) and Western Pacific Region (WPR).
Regional workshop on Nutrition labelling to promote healthy diets

Bangkok, Thailand, 17–19 April 2018
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**Workshop overview and objectives**

A healthy food environment is essential for optimum nutrition and, several population based policy measures have been promoted by WHO to support a healthy food environment. Nutrition labelling is one option, as one of a package of interventions to improve nutrition status. International standards and guidance for food labelling have been defined by Codex Alimentarius Commission, within the framework of the joint FAO/WHO Food Standards Programme. The Codex guideline states that nutrition labelling should be mandatory for all foods for which nutrition claims are made, and recent guidance proposed changes to the nutrient declaration panel (nutrient information label) that reflect the growing importance of diet ary risk for noncommunicable diseases (NCDs). Since labels on pre-packaged food provide consumers with information about the food product, they should be factual and non-misleading and, enable consumers to make healthier choices and also encourage industry to reformulate foods to a more nutritious composition. Nutrient information declarations may be difficult for consumers to understand, but they are a key pre- requisite to ensuring that manufacturers provide accurate information on the nutritional content of the product, and to implement other policy measures including front of pack labelling (FoPL), WHO’s recommendations on marketing of foods and non-alcoholic beverages to children and fiscal policies to promote healthy diets. FoPL provides nutrition information culled from the nutrient declaration panel and help consumers to make informed choices.

A review of nutrient labelling practices in South- East Asia and Wester Pacific Regions show a varied landscape.¹ Nutrient information declarations remains voluntary in many countries, unless a nutrition claim is made. Some implement mandatory nutrient content labelling. Few have updated their regulations as per the new codex guidance on inclusion nutrients relevant for the prevention and control of NCDs. In some countries, voluntary FoPL schemes have been implemented.

¹ TECHNICAL BRIEF: NUTRITION LABELLING AS A POLICY OPTION TO PROMOTE HEALTHY DIETS 2017.
At a Regional level, countries have committed to implementing nutrition labelling as a policy option to promote healthy diets. The Strategic action plan to reduce the double burden of malnutrition in the South-East Asian Region (2016-2025)\(^2\) and the Action plan to reduce the double burden of malnutrition in the Western Pacific Region (2015-2018)\(^3\) and the NCD action Plan\(^4\) endorsed by the respective Member States recommends to incorporate nutrition labelling (including front of pack labelling) into effective national measures. With the increase in volume of processed, pre-packaged foods entering Asian and Pacific markets, countries need technical support in implementing mandatory nutrition information labels (back of pack labelling) and FoPL that would promote healthier choices in processed food consumption. WHO recently developed a tool to guide countries in deciding appropriate FoPL, ‘WHO guiding principles and Framework Manual for front of pack labelling for promoting healthy diets’ (draft). Many global examples of successful labelling options are also available to be shared with countries, along with technical guidance on implementing labelling.

Therefore, in April 2018, a three-day Regional workshop on nutrition labelling to promote healthy diets was organized as a collaborative effort between the Nutrition and Health for Development Unit, WHO HQ, and the Regional Offices of South-East Asia (SEAR) and Western Pacific Region (WPR). The meeting was attended by national representatives from 15 countries – Bangladesh, Bhutan, Democratic People’s Republic of Korea, India, Indonesia, Maldives, Myanmar, Sri Lanka and Thailand (SEAR) and Fiji, Malaysia, Mongolia, Philippines and Viet Nam from the Western Pacific Region and by invited experts. (list of participants, experts and secretariat annexed).

Leveraging the information shared by country teams, regional and international experts, the workshop focused on achieving the following objectives:

(1) To update countries on the current international standards and guidelines for nutrient content labelling set by Codex Alimentarius and advocate mandatory nutrient labelling.

(2) To share global and regional experiences regarding interpretative front of pack labelling schemes.

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(3) To provide technical information on processes when implementing nutrient content and interpretative front of pack labelling.

(4) To identify the technical support required by countries to implement comprehensive nutrient labelling measures and for monitoring and evaluation of nutrient labelling schemes.

The workshop advocated mandatory nutrient content labelling, context specific government led FoPL with robust monitoring. It provided technical and regulatory inputs on labelling. Throughout the workshop, group work sessions focused on identifying key strategies and actions to improve food labelling as suitable to each country’s context.
Summary of workshop sessions

Opening session

The workshop opened with a message from Dr Poonam Khetrapal Singh, Regional Director, WHO South-East Asia Region, which was delivered on her behalf by the Regional Adviser, Nutrition and Health for Development (RA NHD), WHO SEARO. Dr Khetrapal Singh emphasized that ensuring good nutrition, food safety and health is a shared responsibility between governments, producers and consumers and emphasized the importance of food labelling in this process. The Regional Director stated that comprehensive government led labelling initiatives will impact diets through ensuring that ‘less desirable’ nutrients (e.g. saturated fats) as well as ‘positive’ nutrients (e.g. vitamins) are highlighted, thereby empowering consumers to make healthier dietary choices.

Technical sessions

Technical sessions opened with a brief update of current trends in consumption of packaged foods and overview of labelling practices in WHO South-East Asia and Western Pacific Regions by the RA NHD, SEAR and the Technical Lead Nutrition, WPR. Plenary presentations covered general aspects of labelling, codex guidance, WHO’s mandate and work with Codex, legal and trade issues and their impact on nutrition labelling, technical information on FoPL and sharing of best practices. Country presentations were grouped in order of how countries had implemented labelling regulations or as facing similar challenges in labelling.
Key messages from plenaries and country presentations

1. Session 1

Session 1 covered nutrient information (content) labelling of pre-packaged foods and codex guidance. Thematic presentations were made on nutrition information labels, its importance and on codex standards including claims; WHO’s work on nutrition labelling, advocacy to codex to align its labelling guidance with global guidance on healthy diets from World Health Assembly resolutions and other mandates was described. Country presentations were on current practices on nutrient information/content labelling practices, and included information on how countries managed health and nutrient content claims. Following the country presentations, group work by country teams noted the key learnings from the session contextual to their countries, as a first step towards developing actionable work plans at the end of the workshop.

1.1 Information from plenary presentations

1.1.1 Codex standards and guidelines related to nutrition labelling. Dr Jenny Reid.

The presentation focused on codex guidelines and standards and practicalities in implementing these.
The relevant codex texts related to nutrient labelling are on the codex website and include:

- General Standard for labelling of pre-packaged foods (Codex Stan -1 1985);
- General Standard for the Labelling of and claims for pre-packaged Food for Special Dietary Uses (Codex Stan 146-1985);
- Guidelines on nutrient labelling (CAC/GL 2-1985); General Guidelines on Claims (CAC/GL1-1979);
- Issues related to Mandatory Nutrition Labelling Appendix 111; Alinorm 10/33/22 (additional guidance)- that nutrient declaration should be mandatory for all other pre-packaged foods except where national circumstances would not support such declarations exemptions- dietary insignificant or small packaging.

Codex guidelines ensure that nutritional labelling is effective in providing consumer information to make wise food choices as well as to convey information on nutrient content of the food. Codex encourages use of sound nutrition science in formulation of products that would benefit public health. The guidelines also direct the provision of supplementary information (e.g. claims)5 and safeguard the public from false /misleading information. Codex principles for nutrition labelling cover the nutrient declaration and supplementary nutritional labelling. It also covers other information: calculation of nutrients, presentation of nutrition content, principles for legibility and principles for establishing nutrient reference values.

Practical aspects:

- To be effective, consumer literacy is essential and consumers need education.
- Support needed by industry – consideration of nutrients to be declared/technical support
- Implementation of codex guidance- relevance to country, technical difficulties such as the need for trained staff, nutrient variability, access to databases are important. Nutrient calculation software, food composition data bases etc are needed.
- Supplementary information is intended to increase consumer understanding – e.g. FoPL. and, the nutrition information panel is a prerequisite for all supplementary information.

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Supporting global consistency in labelling is important, as is ensuring compliance and enforcement of nutrient content labelling, claims regulations.

1.1.2 Codex guidance and WHO’s work on nutrition labelling. Dr Chizuru Nishida

The presentation covered WHO’s work and activities to support healthy diets through Codex guidance.

The Global Diet and Physical Activity Strategy (DPAS) recommendation on policies to improve the food policy environment (marketing regulations, labelling, and fiscal policies) need Codex support to be implemented. The DPAS informed the launching of the codex TRS 916-31st CCFL and 35thCCNFSDU. The TRS 916 serves as the scientific base for DPAS. The DPAS recommends achieving energy balance, limiting energy from total fat and saturated fats, increasing vegetable and fruit consumption and reduction of free sugars and salt. DPAS also recommends strengthening of norms and standards drawn up by codex to improve diets.

WHO requested Codex Alimentarius Commission to consider, within its operational mandate, evidence-based actions to improve the health standards of foods, consistent with the global mandates and strategies (e.g. Tech Report Series 916- the scientific basis for DPAS).

- The general principles and Codex guidelines on nutrient labelling have been revised to include nutrients of interest to NCD risk, (2015). Nutrient Reference Values (NRV) established NRV-NCD on sodium, SFA and potassium. NRVs based on levels of nutrients associated with reduction in risk of NCDs, not including nutrient deficiency diseases are developed.
- In 2017, the 44th CCFL agreed to start work on guidance on FoPL.

Table 1a. Highlights of the draft action plan to implement the diet and physical activity strategy through codex, developed by WHO in 2007.

<table>
<thead>
<tr>
<th>Codex Committee for Food Labelling (CCFL)</th>
<th>Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nutrition labelling</td>
<td>Nutrition labelling</td>
</tr>
<tr>
<td>Nutrition claims</td>
<td>Nutrition claims</td>
</tr>
<tr>
<td>Quantitative declaration of ingredients</td>
<td>Production and processing standards regarding the Nutrition Quality and Safety of foods</td>
</tr>
<tr>
<td>Modification of standardized foods</td>
<td></td>
</tr>
</tbody>
</table>
Technical reports have been produced after the WHO technical meeting on labelling.\textsuperscript{6}

### 1.2 Country presentations

<table>
<thead>
<tr>
<th>Country</th>
<th>Details</th>
</tr>
</thead>
</table>
| Bangladesh | - Recently the Govt has promulgated Food Safety Regulation (labelling); Food safety labelling regulation 2017, which includes the mandatory labelling of energy, fats, carbohydrates, sugar, salt and protein.  
- Implementation is not yet enforced, but planning is in process. The monitoring is planned to be by sanitary inspectors who’s capacity will be built, but many other challenges remain, mainly lack of technical capacity of small and medium term enterprises to accurately label nutrition content.  
- Re health and content claims, no claims are allowed without approval, but not enforced.  
- General challenges: lack of coordination between different bodies, lack of awareness of consumers and accredited laboratory facilities. |
| Democratic People’s Republic of Korea | - Current status of legislation: KPS10628: Foods-General Requirements for Labels: The following nutrients are mandatory: energy; protein; carbohydrate; fat  
- At present, food manufacturers prepare and submit their labels and submit to National Nutrition Center and National Standards departments.Challenges: lack of understanding of nutrient content labels by consumers; varied industry led FoPL designs;  
- Future plans: strengthen consumer education; update national standards for FoPL; review and harmonize nutrient content label.  
- Challenges: implementing labelling regulations, monitoring, poor awareness and label literacy of consumers, lack of accredited laboratories,  
- Future plans: multisectoral actions and coordination among regulatory bodies, capacity building of laboratories. |

\textsuperscript{6} Nutrition labelling for promoting healthy diets; Report of a Technical meeting on nutrition labelling for promoting healthy diets, 9-10 December 2015, WHO
<table>
<thead>
<tr>
<th>Country</th>
<th>Details</th>
</tr>
</thead>
</table>
| **India** | - Nutritional content labelling has been mandatory since 2011. Now expanded to cover NCD related nutrients (draft ready).  
- Current status of legislation: provisions for mandatory FoPL have been drafted (labelling and display regulations 2018) and are up for public comments at present.  
- India has a robust institutional system for developing standards –through its scientific panels and committee. New review groups have been formed for setting standards for food groups including oils and fat, milks and products.  
- Challenges: enforcement of regulations difficult; knowledge, resource issues, consumer lack of awareness, predominance of small food business operators who need support to follow accurate labelling regulations.  
- Future plans: more organized enforcement of labelling regulations. |
| **Indonesia** | - Current status of legislation: MoH Regulation No 30, 2013 Concerning the inclusion of sugar, salt and fat content and health messages to processed and fast foods and 2 decrees related to labelling. Regulation on claims- 13/2016 regulation also available.  
- Energy, protein, fat carbohydrates and sodium are mandatory on the nutrient content label, but not implemented. Gradual implementation planned for 2019 along with a specific health message  
- Future plan: MoH Regulation No 30 to be implemented in 2019 and develop a consumer friendly FoPL.  
- Challenges: mandatory or voluntary, identification of highly consumed foods and drinks? What symbol to use? Incentives for industry to implement. |
- Front of pack energy values are being implemented on a voluntary basis along with % of Recommended energy and nutrient intakes.  
- Challenges: expansion of nutrients to include sodium, sugar and fats is challenging  
- Monitoring and post market surveillance issues  
- Future plans: to improve monitoring and post market surveillance. |
Country presentations on experiences on voluntary nutrient labelling including regulating health and nutrition claims:

<table>
<thead>
<tr>
<th>Country</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mongolia</td>
<td>Mongolian Law on Food security 2012 on general requirements in labelling. MNS 6648:2016: Requirements for labelling pre-packaged foods, including nutritional value and ingredients. Implementation rate 71%. Guideline on front of pack labelling (Health Ministerial order #221, 2017) which is a colour coding (voluntary) on total fat, sat fat, sugar and salt is developed. Challenges: Monitoring and implementation of labelling regulations; poor label literacy of people and, voluntary industry compliance.</td>
</tr>
<tr>
<td>Myanmar</td>
<td>At present, there are no directives for nutrient labelling of products including health and nutrient claims. Only regulation on labelling is in relation to the Code of marketing of Breast milk substitutes (24 July 2014). The new food law is currently being drafted and will be in line with the new Codex guidance. Directive order covering food labelling will be enacted and will include the general standard for labelling of packaged foods: guideline on nutrient labelling; general guidance on claims and language of label.</td>
</tr>
<tr>
<td>Viet Nam</td>
<td>Viet Nam’s legislation supporting food labelling consists of Food Safety law (2010) of National Assembly. Decree NO 43/2017 NDCP of Govt. on food labelling and a further decree in 2018 (NO15/2018 NDCP with some labelling provisions. At present, labelling of nutrients in pre-packed foods are voluntary. Challenges: lack of capacity to assess nutrient content of labels. management and supervision of Quality Control of the products, laboratory capacity. The plan is to harmonize with ASEAN guidance.</td>
</tr>
</tbody>
</table>

Group work 1: Country teams, together with an expert discussed the contents of the morning sessions and noted the information relevant to developing country action plans on Day 3.

2. **Session 2. Front of pack labels**

Session 2 focused on FoPL - types of FoPL, the evidence for different labelling systems, and experiences from the Region. Session 2 also included international legal frameworks for food labelling, trade and regulatory barriers and an introduction to the draft guiding
principles for developing and implementing FoPL systems. Countries who imported a majority of their products and thus faced unique challenges in labelling gave their perspectives.

## 2.1 Information from plenary presentations.

### 2.1.1 Overview of Front of Pack labelling (FoPL), Dr Bridget Kelly

In modern retail stores, pre-packaged foods dominate, making healthy choices difficult—thus the many types of FoPL seen globally. Signposting healthier choices may be useful in positively in shifting food purchases. FoPL definitions vary but usually include supplementary nutrition information, nutrition and health claims and warning labels. Its main aims are assist people to healthier choices and, drive reformulation. FoPL can be categorized into interpretative, non-interpretable and hybrid (see figure 2.1 and each system has advantages and limitations. Evaluations of FoPL show that consumers prefer interpretative or hybrid systems that are easy to understand. Most consistent evidence shows that interpretative aids support understanding and label comprehension and improve food choices. New evidence is emerging that warning labels are well understood. Numerical information is shown to limit understanding. Overall, information is limited on performance of FoPL on supporting healthier food choices, health outcomes and product reformulation. There is limited evidence on FOPL performance from non-Western countries.

![Figure 2.1. FoPL systems](image)

**Types of FOPL systems**

<table>
<thead>
<tr>
<th>System</th>
<th>Features</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Interpretive</strong></td>
<td></td>
</tr>
<tr>
<td>Endorsement logo</td>
<td>- Overall assessment covering multiple nutrients</td>
</tr>
<tr>
<td></td>
<td>- Products are eligible to carry the endorsement symbol if a nutrition standard is met</td>
</tr>
<tr>
<td>Summary indicator</td>
<td>- Overall ‘healthiness’ indicator covering multiple nutrients</td>
</tr>
<tr>
<td>Nutrient-specific</td>
<td>- Food is categorised for each of a number of nutrients</td>
</tr>
<tr>
<td></td>
<td>- Provides both positive and negative judgments</td>
</tr>
<tr>
<td><strong>Non-interpretive</strong></td>
<td></td>
</tr>
<tr>
<td>Nutrient-specific</td>
<td>- States quantities of certain nutrients and/or % of reference intake for each nutrient</td>
</tr>
<tr>
<td></td>
<td>- No evaluative judgment</td>
</tr>
<tr>
<td><strong>Hybrid</strong></td>
<td>- Mix of interpretive and non-interpretive elements</td>
</tr>
</tbody>
</table>
Interpretive systems:

**Endorsement logos**

*Format:* Healthy eating symbols

*Content:* Integrated information about a range of nutrients

*Purpose:* Provides only a positive evaluative judgment to indicate which foods are ‘better for you’ choices, often within a food category.

*Limitations:* Ambiguity of meaning behind the absence of a label—either that product is less healthy or that manufacturer has declined to participate (voluntary scheme); customers may overlook non-occurrences, misunderstood to mean that its part of a healthy diet, rather than a healthier choice.

**Summary Indicator**

*Format:* colours, stars

*Content:* aggregated numeric score; Graded rather than binary

*Purpose:* judgement provided on overall healthfulness of product and comprehensive across all foods

**Nutrient specific**

*Format:* colours, signs

*Content:* indicate levels of key nutrients

*Purpose:* focus attention on important nutrients.

Positive or negative evaluative judgements given

*Limitations:* Mixed nutrient profiles may introduce confusion for consumers (e.g. display a mix of red and green, and/or multiple amber coloured indicators) and some products with warning indicators may contain essential micronutrients.
Non-interpretative nutrient specific systems:

Format: usually monochromatic

Content: nutrient/energy amounts in a serve provided

Purpose: identify relative contribution that a serve of the food makes to overall diet.

Limitations: Requires substantial cognitive processing and implies that guideline daily amount is an intake goal when for most negative nutrients the objective is to minimize intake

Hybrid systems: mix of interpretive and non-interpretive: Health Star rating, Australia:

A synthesis of current evidence on the performance of FoPL systems based on consumer preference, perceived understanding, impact on purchase intentions, health and nutrition impact and food reformulation is given (Table 2.1)

Table 2.1. Current evidence on FoPL system performance

<table>
<thead>
<tr>
<th>Evidence from</th>
<th>Interpretive nutrient-specific systems</th>
<th>Summary indicator systems</th>
<th>Endorsement logos</th>
<th>Hybrid systems</th>
<th>Non-interpretative nutrient-specific systems</th>
</tr>
</thead>
</table>
| Consumer preferences   | Consistently liked. Most review evidence relates to traffic light colour-coding | Consistently disliked (simple traffic light label) | Inconsistently liked and disliked | Consistently liked. Most review evidence relates to traffic light colour-coding  
Emerging evidence that consumers prefer the Health Star rating system where this has been introduced | Consistently disliked |

Guideline Daily Amounts (EU):

<table>
<thead>
<tr>
<th>Percentage daily intake (Australia, NZ)</th>
</tr>
</thead>
<tbody>
<tr>
<td>766 Calories</td>
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</table>

Guideline Daily Amounts (Australia, NZ)
<table>
<thead>
<tr>
<th>Evidence from</th>
<th>Interpretive nutrient-specific systems</th>
<th>Summary indicator systems</th>
<th>Endorsement logos</th>
<th>Hybrid systems</th>
<th>Non-interpretive nutrient-specific systems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Perceived understanding</td>
<td>Consistently perceived as easy to understand. Most review evidence relates to traffic light colour-coding</td>
<td>Limited evidence</td>
<td>Inconsistent perceived understanding, may lead to misinterpretations of product qualities</td>
<td>Consistently perceived as easy to understand. Most review evidence relates to traffic light colour-coding</td>
<td>Consistently perceived to be difficult to interpret</td>
</tr>
<tr>
<td>Objectively tested understanding</td>
<td>Mostly consistent evidence that interpretational aids support understanding. Most evidence relates to traffic light colour-coding</td>
<td>Limited evidence</td>
<td>Limited evidence</td>
<td>Limited evidence</td>
<td>Emerging evidence that Health Star Rating is well understood</td>
</tr>
<tr>
<td>Impact on purchase intentions</td>
<td>Consistent evidence that traffic light colour coding leads to favourable food choices</td>
<td>Emerging evidence that Nutri-score has minimal impact on the favourably of food choices</td>
<td>Limited evidence</td>
<td>Limited evidence</td>
<td>Consistent evidence that these systems do not favourably influence food choices</td>
</tr>
<tr>
<td>Impact on actual purchases</td>
<td>Emerging evidence that MTL supports healthier purchases</td>
<td>Limited evidence</td>
<td>Limited evidence</td>
<td>Emerging evidence that HSR supports healthier purchases</td>
<td>Limited evidence</td>
</tr>
<tr>
<td>Health and nutrition impact</td>
<td>Limited evidence</td>
<td>Limited evidence</td>
<td>Limited evidence but associated with better dietary intake</td>
<td>Limited evidence</td>
<td>Limited evidence</td>
</tr>
<tr>
<td>Food reformulation</td>
<td>Limited evidence</td>
<td>Limited evidence</td>
<td>Limited but mostly consistent evidence that logos have influenced favourable changes</td>
<td>Limited evidence</td>
<td>Limited evidence</td>
</tr>
</tbody>
</table>

Source: Presentation by Bridget Kelly
To implement an FoPL, a nutrient profiling method needs to be developed based on the type of FoPL selected. Categories of nutrient profiling:

- **Reference amounts**: used for non-interpretive systems. Intended to help consumers understand relationship between nutrient content per serve and nutrient guidance. Known as % NRV by Codex. Ref. intakes based on average adult requirements.

- **Set threshold amounts that meet a nutrition standard**: used in non-interpretive nutrient specific systems and endorsement logos. Thresholds apply cut points to divide nutrient amounts into categories. Can be ordinal or binary.

- **Apply algorithms for overall nutrition profile**: used in summary indicators. These categorize foods according to their overall nutrition composition and give a single score.

- **Profiling has to consider inclusion of only negative nutrients, or positive ones as well.**

### 2.1.2 Regional experiences in FoPL

<table>
<thead>
<tr>
<th>Regional experiences in implementing Front of Pack labelling</th>
<th>Sri Lanka- (expert presentation)</th>
<th>The FoPL system in Sri Lanka applies only to beverages. Its evolution was led by government and the design was guided by the following information, principles and criteria. Based on population dietary patterns and diet related NCDs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stakeholder consultations were held with consumers, health sector, scientists, food manufacturers and retailers</td>
<td>The legal framework under which the FoPL would be introduced was identified early</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Aims and objectives:- to provide a convenient relevant and readily understandable nutrition information to assist consumers to make informed choices.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Focus was on beverages. Only a single system is permitted to prevent consumer confusion.</td>
<td></td>
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</tbody>
</table>

Sri Lanka-(expert presentation)

The FoPL system in Sri Lanka applies only to beverages. Its evolution was led by government and the design was guided by the following information, principles and criteria. Based on population dietary patterns and diet related NCDs

- The legal framework under which the FoPL would be introduced was identified early
- Aims and objectives:- to provide a convenient relevant and readily understandable nutrition information to assist consumers to make informed choices.
- Focus was on beverages. Only a single system is permitted to prevent consumer confusion.

Stakeholder consultations were held with consumers, health sector, scientists, food manufacturers and retailers
India: Translating FOPL policy into practice

Prof Madhavan Nair

India’s data indicated the changing patterns in disease burden trends from 1990-2016, with NCDs increasing substantially. However, a large difference were seen across states. Unhealthy diets were identified as a risk factor and the need to address the problem was recognized.

The Food Safety and Standards Authority of India constituted an expert group to review the dietary intake of fat, salt and sugar by Indians, examine the products with FSS in the market and assess the potential risk to vulnerable groups and provide recommendations.

There was a lack of quality studies from India, but global evidence was used.

HFSS foods were defined, thresholds for food categories were based on the WHO nutrient profile model and a draft interpretative label was developed.

The draft NP model and FoPL would be pretested prior to the final decision.

2.1.3 International legal frameworks for food labelling, consumer rights, trade and regulatory barriers. Dr Manisha Shridhar, RA-IPT

The Codex Alimentarius aims at protecting consumer health and promoting fair practices in the food trade, to further the development of the international food trade. Codex guidance should include all principle foods, raw or processed, for manufacturing or for direct sale to consumers, food additives and contaminants, and food hygiene rules.

Trade agreements impact nutrition- international legal frameworks govern the trade of food:

- Conventions/ WTO - customary international law provided for state to state disputes
- Investor – State Arbitration
- Voluntary private standard (PS) schemes

National: also, national laws and policies which govern the trade of foods.

Regional treaties such as the North American Free Trade Agreement, EU treaties affect regulatory interventions to promote healthy diets.

WTO, Globalisation, trade and public health: public health provisions in TRIPS/WTO:

The Technical Barriers to Trade (TBT) applies to disputes on packaging and labelling and measures on regulating contents of food products. Thus, labelling requirements need to be non-discriminatory to meet terms of free trade laws. Awareness of public health
provisions in TRIPS/WTO is essential. The precautionary principle is essential and can be applied to promote healthy diets since the principle states that: if an action or policy has a suspected risk of causing harm to the public or the environment, in the absence of scientific consensus that the action is harmful, the burden of proof that it is not harmful falls on those taking the action. Regulation EC/178/2002 (Article 7) formally establishes the Precautionary Principle as an option open to risk managers when decisions have to be made to protect health but scientific information concerning the risk is inconclusive or incomplete in some way.

Public health provisions in TRIPS/WTO

Article 7 – Objectives - The protection and enforcement of intellectual property rights should contribute to the mutual advantage of producers and users of technological knowledge and in a manner conducive to social and economic welfare, and to a balance of rights and obligations.

Article 8 – Principles - Members may, in formulating or amending their laws and regulations, adopt measures necessary to protect public health and nutrition, and to promote the public interest in sectors of vital importance to their socio-economic and technological development. This confers an advantage to countries in implementing regulations to protect public health.

2.2 Country presentations

Small countries importing a majority of food items included Fiji, another country with a small population, and importing 65% of foods but have initiated a voluntary FoPL system.

<table>
<thead>
<tr>
<th>Maldives</th>
<th>National Standard for labelling of pre packed foods and claims was implemented in 2014.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The other regulation is on import, produce and sale of BMS substitutes (2008) and a consumer protection act and regulation.</td>
</tr>
<tr>
<td></td>
<td>Since Maldives has a small population, import goods/labels are not specifically made for Maldives.</td>
</tr>
<tr>
<td></td>
<td>Problems: labels in languages other than English or Dhivehi; missing mandatory information on expiry dates etc–retail packs are not labelled so many unlabelled products are sold, unregulated imports, parallel imports and fake products. Claims are not allowed.</td>
</tr>
<tr>
<td></td>
<td>There is no testing facility so mandatory labelling maybe an issue.</td>
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<td></td>
<td>No regulatory framework, or market surveillance.</td>
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<td></td>
<td>A new Food bill will bring mandatory labelling, but will not include nutrient content labels.</td>
</tr>
</tbody>
</table>
### Bhutan
- Labelling has been identified as an important issue. The regulation would prevent labelling in other languages other than English or dzonkha, protect consumers with regard to food quality, protect the country from sub-standard products being dumped.
- Therefore, new regulation under the food rules and regulations 2007 (sections 6-13).
- Efforts to implement these requirements started in 2008 but slow progress due to challenges.
  - Small scale importers bringing packaged food through informal channels,
  - Lack of connectivity between govt agencies – health and agriculture
- However, the new labelling requirements do not yet contain mandatory nutrient labelling since, the country is moving in a stepwise manner.

### Timor-Leste
- Timor-Leste currently does not have any labelling regulations, and relies heavily on imported good - >80% of goods are imported.
- Plans are underway for regulations, but challenges of HR and laboratory capacity prevent progress.

### Fiji
- Is planning to implement front of pack labelling, since 68% of food products are imported.
- Fiji has current nutrient labelling requirements for salt, sugar and fats in addition to regular nutrients. However, consumer understanding and reading of labels is poor.
- FoPL is planning to be using a similar system to Australia and New Zealand’s Health Star Rating system on a voluntary basis
- This is a simple to understand interpretative system.
- Consumers already familiar since many imported products are from Australia.

### 3. Session 3. Draft Guiding principles for developing and implementing FoPL and identification of country actions.

Draft guiding principles for developing and implementing FoPL were discussed in two group work sessions. The sessions were preceded by information on guiding principles, with practical examples to inform country team action plans on planning a development of an FoPL system or reviewing an existing or planned system, or for countries with no regulations on nutrition labelling, to plan initial steps to be taken. A session was also done on nutrition knowledge and food label use. Three presentations from countries that had already implemented FoPL systems (voluntary or mandatory) informed session 3.
### 3.1 Country presentations

<table>
<thead>
<tr>
<th>Country</th>
<th>Details</th>
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</thead>
<tbody>
<tr>
<td>Thailand</td>
<td>FoPL system implemented as a voluntary scheme in the country, On a small number of food products. There is a law on GDA labelling of snack foods which is mandatory – Monochrome labelling of snacks. Nutrient content labelling is also mandatory from 1998. There is also a voluntary healthier choice symbol - nutrient profiling criteria for healthier choice has been prepared by the country. Planned revision of nutrient labelling regulations: reference serving sizes and function claims. Extend GDA labelling to all foods. Extend the healthier choice symbol to more products and to cafes etc.</td>
</tr>
<tr>
<td>Malaysia</td>
<td>The National Plan of Action of Malaysia 2016-2025 states that consumers should be educated on nutrition labelling and that the Healthier Choice logo (front of pack labelling) should be implemented. It was launched in 2012. This is voluntary and the MoH is promoting industry to join. At present, only energy is highlighted, and the nutrient profiling system used is based on the Choices NP model, an industry based one.</td>
</tr>
<tr>
<td>Sri Lanka</td>
<td>Recent labelling regulations (2015) under the Food Act has implemented a mandatory colour coding of beverages. The thresholds for coding were developed by experts, considering other country experiences. Colour coding is applicable to carbonated beverages, ready to serve drinks other than milk based products, fruit nectar and fruit juices. Any of these beverages would have either a red, amber or red sign with the words high sugar and the level provided in g/100ml. The FoPL was supported by a media campaign to raise awareness, Resulting from the colour coding, there was a reduction in sugar levels in beverages almost immediately and there was a drop in carbonated sales beverages by 15 %. Addition of non-sugar sweeteners to beverages was a consequence of the colour coding. Challenges: industry resistance and technical resistance on thresholds etc from various experts/organisations, lack of commitment from industry to reduce sugar in significant amounts- made marginal reductions to stay within the lower colour code.</td>
</tr>
</tbody>
</table>
3.2 Guiding principles for FoPLs and steps.

The principles for development of a FoPL system should be considered at all stages of system development, implementation, and monitoring and evaluation. The process of developing country-specific aims, scope and principles of the FoPL system should be transparent and easily accessible. The process should be Government-led, and be supported by key stakeholders through multi-stakeholder advisory committees or workshops and consultation processes. The nutrient profiling criteria should be the responsibility of the government, via an expert group, and refer to credible scientific sources to safeguard public interests.

3.3 Information from plenary presentations.

3.3.1 Draft guiding principles for developing and implementing FoPL system, Dr Chizuru Nishida

Figure 3.1 Main steps in developing an FoPL system
**Overarching principles:**

- Principle 1: The FOPL system should be aligned with national public health and nutrition policies, food regulations and authoritative dietary guidelines.
- Principle 2: A single system should be developed to improve the impact of the FOPL system.
- Principle 3: Mandatory nutrient declarations on food packages are a prerequisite for FOPL systems.
- Principle 4: The evolution of FOPL systems may require continuing improvements or adjustments as necessary, including a process to monitor and review any FOPL system.
- Principle 5: The aims, scope and principles of the FOPL system should be transparent and easily accessible.

**Principles for a collaborative approach to FOPL development**

- Principle 6: Government should lead the multi-sectoral stakeholder engagement process for the development of trusted systems, including nutrient profiling criteria.

**Principles for FOPL system format (design and content)**

**Design**

- Principle 7: The FOPL system should be interpretive, based on symbols, colours, words and/or quantifiable elements.
- Principle 8: The design of FOPL systems should be understandable to all population sub-groups and be based on the outcome of consumer testing, evidence of system performance and stakeholder engagement.

**Content**

- Principle 9: Content should encompass nutritional criteria and food components that aim to inform choice and enable interpretation of food products against risks for diet-related NCDs and for promoting healthy diets.
- Principle 10: The system should be aligned with WHO guidance, relevant Codex guidelines, national nutrition guidelines and other relevant nutrition policies.
- Principle 11: The FOPL system should enable appropriate comparisons between food categories, within a food category, and between foods within a specific food type.
**Principles for Implementation of FoPL systems**

- Principle 12: Uptaking of the FOPL system should be encouraged across all eligible packaged foods, either through regulatory or voluntary approaches.
- Principle 13: Early engagement of industry groups and the development of guidance documents (i.e. style guide) are necessary in facilitating the implementation of the FOPL system.
- Principle 14: Engagement with key opinion leaders (including food and nutrition experts and the media) and consumers are essential and should be well managed.
- Principle 15: Well-resourced public education campaigns and consumer education with special consideration of techniques to target at-risk groups are necessary for improving nutrition literacy and consumer understanding and use of FOPL system.
- Principle 16: Baseline data should be collected to support monitoring and evaluation of the impact on consumers and reformulation of food products.

The consensus from the group were that there were too many principles, and some could be combined; further clarity was needed for specific areas.

### 3.3.2 Principles for FoPL format and content. Dr Renuka Jayatissa

The sequence of activities that preceded Sri Lanka’s implementation of the FoPL system for beverages were presented, within the context of the guiding principles. Initial information was obtained from epidemiological analysis and population dietary patterns, together with information from relevant national nutrition policies prior to defining the aims and scope of the labelling system. These were defined based on national requirements. The importance of aligning the FoPL system with other food regulation and public policies was highlighted. Having a single mandatory system was preferred, for best impact in reducing consumption of beverages high in sugar, and promoting reformulation. Initially, informal communications were held with relevant stakeholders followed by a formal, government led process. The multi sectoral process included consumer and health organisations, scientists, food manufacturers and retailers, which created a good environment for implementation of FoPL on beverages.

### 3.3.3 Selecting the FoPL design. Dr Bridget Kelly

The key principles of FoPL systems:

(a) Should be interpretative, based on symbols, colours and/or quantifiable elements.
(b) The design should be understandable to all population groups and be based on consumer testing and evidence, and should be aligned to WHO and relevant Codex guidance.

(c) Should also be aligned to other national nutrition and food policies

(d) Needs to enable comparisons between and within a food category.

Countries could adapt an existing system or develop a new one. Stakeholder inputs ensures that the system is feasible for industry, credible to consumers and applies scientific evidence.

When selecting the FoPL many aspects need to be considered. The key ones are

- Content- the information that will be conveyed
- Format- how information will be portrayed.

A government led stakeholder engagement is best to identify the above, taking into consideration that the system aligns with other national food and nutrition policies, applies evidence from scientific research on food labelling, is credible to consumers and feasible for industry. The format should be interpretative, based on symbols, colours and quantifiable elements and be understandable to all population sub groups as based on outcome of consumer testing, evidence of system performance and stakeholder engagement. A country can adopt an existing system, or develop a new system.

### 3.3.4 Steps to implement the developed PoPL (and monitoring).

**Dr Jenny Reid**

Implementing the developed FoPL system should seek to be widespread and apply across the majority of packaged, processed foods which require a nutrient declaration. Early engagement with food industry is essential to familiarize and ensure their ability to use the nutrient profile criteria. Support is especially important for small businesses as they lack specialist staff. Policymakers need to understand the challenges of implementation for industry.

Early engagement with key opinion leaders, media and political leaders and industry will ensure a smooth implementation. Well-resourced and targeted public education campaigns (on the system and the messages) can help use and understanding of FoPL. Prior to implementation baseline data should be collected to assist with monitoring. Consumers should be educated. Uptake of all eligible food should be encouraged

- Consideration of voluntary or mandatory
- Timing and phasing to take into account logistics such as label design and change
Guidance documents need to be prepared for industry: e.g. on how to implement; A style guide outlining the design (developed for and with industry), other tools for industry to calculate the label, Guidance on communicating the use of the labels with consumers and a “go to” place for questions and answers.

**Monitoring and evaluation**

Essential to know what the baseline is on the following: Consumer understanding; Composition of key foods; Food intake; Labelling; Health data; Ability to monitor reformulation of foods;

Uptake of the system across the food supply; Impact of the system on consumer understanding and purchasing; Impact on the food supply – reformulation Impact on nutrient intake, any unintended consequences. There must be provisions to modify the system and respond to inconsistencies or anomalies.

### 3.3.5 Monitoring and evaluation nutrition labelling experiences from Chile. Lorena Roderiguez Osiac

A national online registration system has been developed, to monitor FoPL, marketing and school nutrition. It carried out studies of citizen perception, food reformulation, monitoring nutritional status and food consumption. Sanitary authorities and inspection teams have been trained to carry out the actual monitoring. A risk approach is used to prioritize monitoring:

Food most consumed by children, mass media most watched by children and school children’s environments. e.g. direct inspections are done in schools.

Once a FOPL system has been introduced, monitoring and evaluation is needed to ensure compliance and enforcement. In Government-implemented or regulated systems, Government has responsibility for the monitoring of FOPL system implementation and compliance. 5-6 years are needed to monitor effectiveness.

The main elements to be monitored are:

The extent and fidelity of implementation of the FOPL system - Number, proportion and types of products

1. The effect of FOPL on changes to consumer understanding, including reported use.
2. The effect of the FOPL system on changes to product purchases
3. The effect of the FOPL system on changes to population dietary intakes
4. The effect of the FOPL system on changes to nutrient compositions of food products including any unintended consequences should be assessed.
A public evaluation of food labelling laws in Chile provided favourable responses with high logo recognition.

3.3.6 Nutrition knowledge and food label use. Nandita Murukutla

Though unhealthy diets are a chief driver of obesity, consumers do not have the adequate information they need to manage the changing food environments, and protect themselves from the lack of information or misleading information. The food labelling/packaging industry is a multibillion dollar one, because the design and information communicates

- product attributes, and by extension, the attributes of the consumer;
- creates differentiation and attracts purchases

So, FoPL is a cost-effective means of counter marketing at point of purchase. They can empower consumers and act as a trigger at the point of decision making, and provide visual cues.

Consumers, even health literate ones, are frequently unable to interpret current systems accurately.

Source: Popkin, B. Front-of-the-package Food Profiling.

Thus, there is a need for clear and impactful labels. Current systems are too varied, rely on inherent knowledge and require calculation, sufficient levels of literacy and language fluency and are ineffective in motivating the desired action. Emerging evidence supports effectiveness of warning labels. To be effective, labels need to:

Be easily understood – pictures stronger than words
Visible- colour, size, placement and design matter
Create the necessary emotions and be personally relevant and motivate immediate action.

Thus, FoPLs must be grounded in social behavioural science.
3.3.7 Guidance frameworks, tools for industry, communication with the public and identifying key stakeholders to implement FoPL Prof Visith Chavasit

Trends in nutrient intakes and food consumption should be examined to see population status for the country as evidence, together with trends in chronic diseases. The Thai Healthier Symbol, with the criterial needs for product groups and the scoring nutrient profile model were described.

The final group work consisted of consolidating and prioritizing the information collected over the past 3 days. Discussions and identification of critical elements/principles from presentation, lessons learned and prioritization of specific areas as relevant to each country.

4. Recommendations and country action plans for labelling

General recommendations

- Nutrition labelling is a key policy option to prevent consumption of unhealthy diets. The increasing availability and consumption of pre-packaged processed foods makes it imperative to provide countries with guidance and technical support on improving their labelling policies. Country policies should be based on country needs and context at all times.

- Advocacy to promote nutrition labelling as part of healthy diets is essential, and WHO and other partners would advocate with countries.

- For countries that do not have any labelling regulations, implementation of Codex guidance on labelling is essential, and must be planned out taking into consideration all aspects, including implementation capacity, role of small manufacturers and sustainable monitoring processes. For countries those voluntary nutrient labelling, regulatory actions should be the aim, along with expansion of the nutrient label to include nutrients of interest to NCDs’ while those with FoPL implemented should aim to scale up and be made mandatory.

- Country support to be provided – specifics to be discussed further and agreed at country level, using the documents action plans as a guide)

- WHO to explore possibility of working with regional bodies and partners to develop common goals and frameworks for regulatory actions to support healthy diets.
WHO would explore the feasibility of engaging in stakeholder consultative processes directly, and with other agencies such as FAO, at different stages of the food supply chain for nutrition labelling to promote healthy diets.

Supportive actions for cross country learning, sharing guidance tools will be facilitated. This includes the promotion of exchange of information on national and international databases for nutrition and labelling; promoting countries in SEAR and WPR Region to join in the global network for labelling which will be launched at the 71st WHA.

**Bangladesh**

<table>
<thead>
<tr>
<th>Problem/challenge</th>
<th>Possible activity steps</th>
<th>Needs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Short term</strong></td>
<td></td>
<td></td>
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<tr>
<td>Coordination between the regulatory bodies to be improved</td>
<td>Multisectoral coordination through technical advisory group at central level.</td>
<td>Technical- practical experience on labelling implementation</td>
</tr>
<tr>
<td><strong>Medium term (1-3 years)</strong></td>
<td></td>
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<tr>
<td>Lack of technical regulations or specifications for all types of foods e.g. fast foods</td>
<td>Formulate standards/thresholds for all food types through the national standard body (BSTI). E.g. National guideline to implement FoPL.</td>
<td>Financial</td>
</tr>
<tr>
<td><strong>Long term</strong></td>
<td></td>
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<tr>
<td>Lack of awareness about current food safety regulations (Labelling regulations of 2017)</td>
<td>Examine possibility of a study tour to experience implementation of labelling.</td>
<td>Technical support for advocacy</td>
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<tr>
<td>Lack of accredited parameters and skilled manpower for implementation and monitoring</td>
<td>Disseminate with relevant stakeholders: industry, health, consumers.</td>
<td>Technical and financial support</td>
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<td>Mass awareness through media</td>
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<td>Capacity building of accredited laboratories</td>
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<td></td>
<td>Improve existing manpower through capacity building.</td>
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### Bhutan

<table>
<thead>
<tr>
<th>Challenges</th>
<th>Key activity steps</th>
<th>Needs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development and implementation of nutrition labelling falls under two ministries (MoH and MoFA)</td>
<td>Re discuss the agenda for development of nutrition content</td>
<td>Training of regulatory officials, health officials and relevant stakeholders in the labelling guideline</td>
</tr>
<tr>
<td>Lack of consumer and food business understanding on nutrition requirements</td>
<td>Labelling guideline for Bhutan to be included in the agenda of the upcoming National Multi sectoral NCD steering committee meeting</td>
<td>Technical support for capacity building (both facilities and human resources)</td>
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<tr>
<td>Technical and infrastructure challenges.</td>
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</table>

### Democratic People’s Republic of Korea

<table>
<thead>
<tr>
<th>Challenges/ opportunities</th>
<th>Key actions</th>
<th>Needs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lack of items in food composition tables</td>
<td><strong>Regulatory:</strong> Amending standards and regulation on FoPL/BoPL</td>
<td>Support for laboratory capacity is needed</td>
</tr>
<tr>
<td>Lack of facilities/ analysts</td>
<td>Harmonization of formats</td>
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<tr>
<td></td>
<td><strong>Scientific:</strong> Completion of nutrition composition tables</td>
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<td></td>
<td>Capacity building within food analysis/other departments</td>
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<td></td>
<td>Nutrient profiling</td>
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<tr>
<td></td>
<td><strong>Industry:</strong> Supervision and enforcement of quality of food products as per the label.</td>
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### Fiji

<table>
<thead>
<tr>
<th>Challenges/opportunities</th>
<th>Actions in 3 areas</th>
<th>Needs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Challenges:</strong></td>
<td><strong>Follow up on governance</strong></td>
<td>Technical expertise to help develop FoPL, -Policy guidelines, -Laboratory capacity, -Marketing ad communication strategy -Monitoring and evaluation. And capacity building on all above aspects.</td>
</tr>
<tr>
<td>Limited accredited Govt Lab capacity- dependency on food industry to provide nutrient content analysis</td>
<td>Formalize agreement between governments- Aust/NZ and Fiji</td>
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<tr>
<td>Limited local technical expertise for labelling</td>
<td>Enhance govt. laboratory capacity</td>
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<tr>
<td>Limited financial support in health budget</td>
<td>Advocate for endorsement of food and nutrition security policy and supporting intervention plan.</td>
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<tr>
<td>Need importers and distributors to agree with proposed FoPL</td>
<td><strong>Development</strong></td>
<td></td>
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<tr>
<td>Food industry influences with policymakers</td>
<td>FoPL policy guidelines (application processes, re-assessments)</td>
<td></td>
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<tr>
<td>Consumer choices- Cost vs healthy</td>
<td>Food and nutrition standards to be developed).</td>
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</tr>
<tr>
<td><strong>Opportunities:</strong></td>
<td><strong>Advocacy and consultation</strong></td>
<td></td>
</tr>
<tr>
<td>HSR system from Australia and NZ can be adopted</td>
<td>with stakeholders- food industry, government partners, consumer council and communities</td>
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<tr>
<td>Food safety Act and Regulations enforce mandatory nutrient labelling</td>
<td>Media campaign on voluntary label.</td>
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<tr>
<td>Revision of Food and Nutrition Security Policy- to include FoPL development and promotion (2018-2022)</td>
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### India

<table>
<thead>
<tr>
<th>Challenges</th>
<th>Proposed activities (short term- within the next 1 year)</th>
<th>Needs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Opportunities:</strong>&lt;br&gt;FSSAI /Scientific panels have drafted guidelines and adequate technical capacity High political commitments for nutrition&lt;br&gt;States are rolling out the National Multisectoral Action Plan for Prevention and Control of NCDs</td>
<td><strong>Next 6 months</strong>&lt;br&gt;1. Initiate consultation process for multi-stakeholder sensitization to improve and finalize the draft guidelines on labelling. Include states, other ministries, civil society, industry and experts.&lt;br&gt;<strong>One year</strong>&lt;br&gt;2. Validate and pre-test the proposed FoPL system&lt;br&gt;3. Finalize guidelines&lt;br&gt;4. Source relevant expertise</td>
<td>Technical support</td>
</tr>
<tr>
<td><strong>Challenges</strong>&lt;br&gt;Focus is yet on undernutrition&lt;br&gt;Cultural barriers and preferences&lt;br&gt;Poor nutrition literacy&lt;br&gt;Federal structure- states at different levels of ETL&lt;br&gt;Industry interference/reluctance</td>
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### Indonesia

#### Challenges and opportunities

**Opportunities:**
- Consumer trends towards health products
- Even to implement FoPL on a voluntary basis
- Industry energized to reformulate to healthier options

**Challenges**
- The variety of food industry: scale - large, medium and small industry operators
- Knowledge of consumers does not translate to healthy consumption behaviours
- Inadequate multisectoral coordination.

#### Proposed activities to develop and implement mandatory FoPL system

**3 key actions**
- Stakeholder engagements with govt, food business operators, consumers (consumer protection board) professional associations through expert groups discussion and public consultations
- Development of an FoPL system
- Setting the regulation

#### Technical activities: 2019-2021

- Strengthen capacity of controlling, monitoring and evaluation by govt body
- Strengthen laboratory analytical capacity
- Advocacy to sub national levels (34 provinces)
- Capacity building of public to educate the consumer

<table>
<thead>
<tr>
<th>Action</th>
<th>January - March</th>
<th>April - June</th>
<th>July - September</th>
<th>October - December</th>
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<tbody>
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</table>

**Needs**
- Technical support for FoPL

### Malaysia

#### Opportunities and challenges

**Strengths**
- Collaboration platform is already available with industry through the Federal Manufacturing of Malaysia and experts from academia
- Nutrient profiling has already been carried out for each category in HCL

**Challenges**
- Public perception of the HCL as an endorsement of a healthy product rather than a healthier product
- Difficulties in engaging with small and medium term enterprises- many are not members of the FMM
- Difficulty to control advertising content by industry

#### Proposed Key actions

- To strengthen education to consumers re symbol (ongoing)
- More collaborations with industry to participate in current FoPL scheme (ongoing)
- Expand the information button in the current FoPL from energy only to add three more nutrients – fat, carbohydrate and protein (2019)

#### Tech support
- Need technical exposure from a country successful in implementing FoPL- through a country visit
### Maldives

<table>
<thead>
<tr>
<th>Opportunities and challenges</th>
<th>Proposed activities (short term- within the next 1 year)</th>
<th>Tech support</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strengths</strong></td>
<td>Advocacy to endorse current food act by the parliament by 2019</td>
<td>Technical and financial support to carry out a consumer behavior survey</td>
</tr>
<tr>
<td>Improving health seeking behavior of public</td>
<td>Revise the existing food labelling standards to add mandatory nutrient declaration by 2019</td>
<td>Technical support for capacity building at MFDA</td>
</tr>
<tr>
<td>High literacy rate in the country</td>
<td>Strengthen capacity at national health laboratory for food testing</td>
<td>Advocacy to endorse Food Act</td>
</tr>
<tr>
<td><strong>Challenges</strong></td>
<td>Consumer survey by 2018</td>
<td></td>
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<tr>
<td>Volatile political environment in the country and</td>
<td>Nutrient intake survey to determine dietary practices by 2020</td>
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<tr>
<td>being import dependent- imports come from all</td>
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<tr>
<td>over the world</td>
<td><strong>Strengths</strong></td>
<td></td>
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<tr>
<td>Limited capacity at the Maldives Food and Drug</td>
<td><strong>Challenges</strong></td>
<td></td>
</tr>
<tr>
<td>Authority (MDFA)</td>
<td>Volatile political environment in the country and being import dependent- imports come from all over the world</td>
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<tr>
<td>Limited lab/infrastructure capacity at MFDA</td>
<td>Limited capacity at the Maldives Food and Drug Authority (MDFA)</td>
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### Mongolia

<table>
<thead>
<tr>
<th>Proposed activities (short term- within the next 1 year)</th>
<th>Tech support</th>
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</thead>
<tbody>
<tr>
<td><strong>Govt led actions:</strong></td>
<td>WHO tech support needed for introductory meeting on voluntary FoPL to</td>
</tr>
<tr>
<td>Develop healthy food guideline</td>
<td>producers and inspectors</td>
</tr>
<tr>
<td>Advocate strategy for FoPL</td>
<td>To increase capacity of local laboratory.</td>
</tr>
<tr>
<td>Improve lab capacity</td>
<td>Train local inspectors on monitoring FoPL of food products</td>
</tr>
<tr>
<td>Approve design format for FoPL and verification of</td>
<td>Update national food standards</td>
</tr>
<tr>
<td>nutrient contents</td>
<td>For advertising and advocacy- TV spots, leaflets broadcast etc</td>
</tr>
<tr>
<td>Regular monitoring of market, Update the related</td>
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<tr>
<td>standards</td>
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<tr>
<td><strong>Producers:</strong></td>
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<tr>
<td>Reformulation of content of selected key nutrients</td>
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<tr>
<td>Labelling and packaging</td>
<td></td>
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<tr>
<td><strong>Consumer support: Advocacy and education:</strong></td>
<td></td>
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<tr>
<td>Choice of healthy foods, Use of labelling</td>
<td></td>
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</table>
### Myanmar

<table>
<thead>
<tr>
<th>Opportunities and challenges</th>
<th>Proposed activities (short term—within the next 1 year)</th>
<th>Tech support</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Challenges (potential)</strong></td>
<td>Stakeholder meeting on food labelling and advocate nutrient content labelling (2018)</td>
<td>Tech support needed to do nutrient content analysis for laboratories (FDA, NNC, DMR)</td>
</tr>
<tr>
<td>Capacity and resource limitations</td>
<td>Including statement/provision for nutrition aspect in drafting of new food law (through NCD and sub-committee) within 2018</td>
<td>Technical support for consumer research</td>
</tr>
<tr>
<td>Compliance of industry due to capacity and other issues—varying levels of capacity</td>
<td>Formative research on consumer understanding and knowledge level on food labelling (2018-19)</td>
<td>Training support for food industry</td>
</tr>
</tbody>
</table>

### Philippines

<table>
<thead>
<tr>
<th>Opportunities</th>
<th>Proposed activities</th>
<th>Tech support</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase in consumer understanding and interpreting FoPL</td>
<td>Review of existing voluntary FoPL system to expand coverage [Q1-Q2-2019—as this is not included as part of the 2018 policy review]</td>
<td>Ongoing review to include provision to declare total net weight/volume of sugar in SSBs</td>
</tr>
<tr>
<td>Expansion of nutrients to be included in the FoPL</td>
<td>Amendment of administrative order 2014-0030 Revised Rules and regulations Governing the Labelling of prepackaged food products</td>
<td>Technical support from expert at WHO to guide review of policies</td>
</tr>
<tr>
<td><strong>Challenges</strong></td>
<td>Further amending certain provisions of AO 88-Bs 1984 or the Rules and Regulations Governing the Labelling of prepackaged food products distributed in the Philippines.</td>
<td>Technical guideline on dev. of advocacy communication and health promotion plan</td>
</tr>
<tr>
<td>Support from key decision makers to prioritize FoPL</td>
<td>[Ongoing review to include provision to declare total net weight/volume of sugar in processed sweetened beverages]</td>
<td>WHO support to revitalize Wise East Certification program</td>
</tr>
<tr>
<td>Inadequate promotion and advocacy activities in regional/remote areas</td>
<td>Revitalize the Wise Eat Certification programme of the Department under the National center for Disease Prevention and Control (NCDPC) – (2019, as priority programmes are already in place for implementation this year)</td>
<td></td>
</tr>
<tr>
<td>Limited personnel to conduct post market surveillance</td>
<td>Ongoing review and development of advocacy communication and health promotion plan</td>
<td></td>
</tr>
</tbody>
</table>
### Sri Lanka

<table>
<thead>
<tr>
<th>Opportunities and challenges</th>
<th>Proposed activities (short term- within the next 1 year)</th>
<th>Needs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Opportunities</td>
<td>Evaluation of traffic light system for beverages within 3 months</td>
<td>Overall technical support and advocacy</td>
</tr>
<tr>
<td></td>
<td>Implement FoPL to other categories (within 1 year)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Establish a powerful monitoring system (within 1 year)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Expand FoPL to other food categories: traffic light to selected food categories- only one nutrient per category is considered</td>
<td></td>
</tr>
<tr>
<td>Challenges</td>
<td>Experience with existing traffic light system</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Strong legal framework</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Active tech committees</td>
<td></td>
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<tr>
<td></td>
<td>NCD identified as a priority public health problem</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Strong political commitment</td>
<td></td>
</tr>
<tr>
<td>Opportunities</td>
<td>Evaluation of traffic light system for beverages within 3 months</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Implement FoPL to other categories (within 1 year)</td>
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<tr>
<td></td>
<td>Expand FoPL to other food categories: traffic light to selected food categories- only one nutrient per category is considered</td>
<td></td>
</tr>
<tr>
<td>Challenges</td>
<td>Limited investment on capacity development; Human, lab and research; Industry influence; Lack of proper monitoring system</td>
<td></td>
</tr>
</tbody>
</table>

### Thailand

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<thead>
<tr>
<th>Opportunities and challenges</th>
<th>Proposed activities (short term- within the next 1 year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thailand</td>
<td>1. Extension of the GDA labelling to all prepackaged foods</td>
</tr>
<tr>
<td></td>
<td>2. Monitoring</td>
</tr>
<tr>
<td></td>
<td>– self regulation by business operators</td>
</tr>
<tr>
<td></td>
<td>– Post marketing- collection of food products and labels from supermarkets for data collection and evaluation with penalty if not compliance with law.</td>
</tr>
<tr>
<td></td>
<td>3. Evaluation</td>
</tr>
<tr>
<td></td>
<td>– Perception and consumer behaviours</td>
</tr>
<tr>
<td></td>
<td>– Percentage of food products with healthier choice in the market- comparison of number of food products</td>
</tr>
<tr>
<td>Opportunities</td>
<td>Thailand has already implemented mandatory nutrient content labelling and a voluntary FoPL scheme</td>
</tr>
<tr>
<td>Challenges</td>
<td>1. Purpose to harmonize a system for NL and FoPL regulations of ASEAN countries: Nutrition labelling and FoPL regulations</td>
</tr>
<tr>
<td></td>
<td>Encourage to use codex NRV instead of national RDA</td>
</tr>
<tr>
<td></td>
<td>Healthier choice- how to set criteria of nutrient profiles</td>
</tr>
<tr>
<td></td>
<td>Analysis of mandatory nutrients and preparation of NL and FoPL</td>
</tr>
<tr>
<td></td>
<td>2. Consider using and comparing healthier star rating system with GDA and healthier choice.</td>
</tr>
</tbody>
</table>
### Timor-Leste

<table>
<thead>
<tr>
<th><strong>Opportunities and challenges</strong></th>
<th><strong>Proposed activities</strong></th>
<th><strong>Tech support</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Challenges</strong></td>
<td>1. Establish Codex Alimentarius group (2018)</td>
<td>Tech and financial support needed</td>
</tr>
<tr>
<td></td>
<td>2. Establish Scientific panels to advise and guide the Authority of Inspection and Supervision of Economic Activity and Sanitary and Food (AIFAESA) to be set up.</td>
<td>-developing imported foods criteria</td>
</tr>
<tr>
<td></td>
<td>3. FBDG to be disseminated and used.</td>
<td>Review capacity building needs for relevant stakeholder on codex actions</td>
</tr>
<tr>
<td></td>
<td>4. Include Nutrition Labelling in the TLNNE 2014-2019</td>
<td>Advocacy support for meeting with relevant ministers, parliament, media and food agencies (importers) to follow criteria</td>
</tr>
<tr>
<td></td>
<td>5. Request for a nutrient analysis of all imported products from a certified lab</td>
<td></td>
</tr>
<tr>
<td></td>
<td>6. Define nutrition criteria on imported foods.</td>
<td></td>
</tr>
<tr>
<td><strong>Opportunities and strengths</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Establishment of a Codex Alimentarius commission 2018</td>
<td></td>
</tr>
<tr>
<td></td>
<td>KOSSANTIL (National Commission for Nutrition and Food Security has been set up)</td>
<td></td>
</tr>
</tbody>
</table>
### Viet Nam

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<tr>
<th>Opportunities and challenges</th>
<th>Proposed activities (short term - within the next 1 year)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Opportunities and strengths</strong></td>
<td>3 key action areas</td>
</tr>
<tr>
<td>- Legal framework is existing laws, decrees and circulars</td>
<td>Govt policies</td>
</tr>
<tr>
<td>- Enforcement effective</td>
<td>Industry commitment</td>
</tr>
<tr>
<td>- Variety of domestically produced foods – easy to control quality and safety from farm to table.</td>
<td>Consumer education</td>
</tr>
<tr>
<td><strong>Challenges</strong></td>
<td></td>
</tr>
<tr>
<td>- Weak consumer understanding and literacy of labels</td>
<td></td>
</tr>
<tr>
<td>- No trained staff so capacity gaps</td>
<td></td>
</tr>
<tr>
<td>- Issues of cost for food industry</td>
<td></td>
</tr>
</tbody>
</table>

Regional workshop on Nutrition labelling to promote healthy diets
Annex 1

Agenda

Opening session
Overview of current status in food labelling practices in WHO South-East Asia and Western Pacific Regions
Codex standards and guidelines and synergies with WHO’s work on nutrition labelling
Experiences from region- Countries implementing nutrient content labelling, and front of pack labelling
Overview of Front of Pack labelling (FoPL) practices; types of FOPL, aims of FOPL, nutrient profiling methods, global evidence, aims
Regional experiences in implementing Front of Pack labelling
Experiences and lessons learned from Chile on (1) regulatory actions to promote healthy diets with a focus on Front of pack labels and (2) Monitoring and evaluation nutrition labelling (including FoPL)
Identification of critical elements/principles from country experiences and lessons learned
International legal frameworks for food labelling, consumer rights, trade and regulatory barriers
Country presentations on challenges faced by countries that import a majority of food items.
Draft guiding principles for developing and implementing FOPL
Principles for FOPL format and content, selecting the FoPL design, nutrient profile and developing an FoPl system
Nutrition knowledge and food label use
Steps to implement the developed FoPL (including monitoring)
Guidance frameworks/tools for industries
Communication with the public, consumer education and identifying key stakeholders to implement FOPL
Country group work and presentations of group work on identifying next steps and action areas
Closing session
Annex 2

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Regional workshop on Nutrition labelling to promote healthy diets

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With the increasing epidemic of overweight and obesity, consumer’s attitudes and awareness towards the nutritional aspect of the foods are increasing rapidly. In this context, nutrition content labels play a significant role in providing consumers with nutrition information which may influence purchase decisions. In order to improve consumer understanding of nutrient content of food products, WHO is advocating for Member States to implement comprehensive nutrition content labelling as directed by the recent Codex guidance. Despite the increasing provision of nutrition information on food products, various factors including lack of time and comprehension difficulties prevent people from making use of this information. Therefore, WHO recommends communicating nutrition information by means of front-of-pack labelling as a tool to combat unhealthy food choices and improve public health. An effective FoPL is one that helps consumers distinguish between healthier and less healthy products and the different FoPLs have varying capacity to achieve this outcome.

With the increase in volume of processed, pre-packaged foods entering Asian and Pacific markets, countries in South-East Asia Region were in need of technical support to implement labelling policies. This report is the result of a three-day Regional workshop on nutrition labelling held in April 2018, to promote healthy diets. The meeting was organized as a collaborative effort between the Nutrition and Health for Development Unit, WHO HQ, and the Regional Offices of South-East Asia (SEAR) and Western Pacific Region (WPR).