Food labeling in Chile: Comments on the letter regarding Law 30021 in Peru

Etiquetado de Alimentos en Chile: comentarios a la carta sobre la Ley 30021 de Perú

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In the letter titled "Law 30021 on the Promotion of Healthy Eating for Children and Adolescents" [Ley 30021 de Promoción de Alimentación Saludable para Niños, Niñas y Adolescentes] addressed to the editor, the frustration of a group of physicians and medical students in Peru can be appreciated regarding the initiative for establishing a front-of-package labeling system of food products which contributes to healthy food decisions. Malnutrition in all its forms is a problem that still continues to increase all over the world, but it is particularly fast in Latin America. (1,2) This issue is evidenced by the increase of overweight and obesity, in both adults and children, even in families where malnutrition coexists.(3) This situation, along with the warnings made by various international health organizations, including the Pan American Health Organization (PAHO), has caused many countries of the region to take different actions in order to improve the diet of their populations.

There are several elements that shape eating habits of societies; therefore, eating can be improved in different ways. Due to the little effect that various nutrition and health education initiatives have had on healthier decision-making processes, the currently discussed initiatives are aimed at modifying the environmental elements that influence food decisions instead of focusing on individual elements. The idea is to support healthy decisions by changing food availability, prices, marketing strategies, sociocultural rules, among other elements regarding the food setting. (4)

One of these environmental elements is food labeling. In many countries, it is compulsory to provide information about the contents of the main nutrients on the packaging along with the ingredients of the packaged food prior to its sale. The characteristics of this labeling system are regulated and may vary from country to country. The studies conducted so far suggest that this type of labeling is used and understood by a minority of the population. This situation transversally occurs in different countries, even in those that have better levels of education.

Many decades ago, the first initiatives offering a labeling system providing information about nutritional quality in a simpler way emerged. Over the years, several alternatives have been proposed, which differ in the level of detail of information, the design, or if they focus on the positive or negative aspects of food, among other characteristics. Most of these experiences have been implemented on an operative basis; therefore, it is hard to estimate the impact. In June 2016, in Chile, Law No. 20606 on the Nutritional Composition of Food and its Advertising was implemented, which highlights (among other issues) the compulsory need to use a black octagonal signal, which, in white letters, reads "high in calories," "high in sugar," "high in sodium" or "high in saturated fats" whenever the packaged food exceeds specified limits for these nutrients. Therefore, in Chile, for over two years, food products packaged prior to their sale started to include up to four stop signals, which indicate that the product has high levels of critical nutrients. It should be noted that, contrary to the letter, this front-of-package labeling system was not a proposal of the food industry: it was created by a group of academics from the Universidad de Chile, as requested by health authorities.

This measure is still too recent to expect substantial changes in the nutritional condition of the population; however, the studies conducted so far in order to assess its implementation⁽⁵⁾ suggest that the public appreciates this measure; they use it to know how healthy the food products are and consume fewer products (in quantity or frequency) bearing many stop signals. Even though this scenario does not occur in the entire population, the measure seems to be adequate, given that, according to various reports, around 50% of the interviewees indicate that they use the labeling according to health authorities' expectations, which constitutes a success from a public health viewpoint.

Some months before Peru adopted the nutritional warning labeling system, the authors of the letter showed their concern about the potential switch from the stop signal to the traffic-light as the front-of-package labeling system for food products sold in Peru. The color-coded labeling is an optional system that was implemented in the United Kingdom more than a decade ago and, in 2014, a compulsory system in Ecuador. To implement this system, three different ranges were determined: 1) low or healthy (green color), 2) medium (orange color), and 3) high or unhealthy (red color), for each one of the relevant nutrients. In this manner, a food product may have up to three different colors for fats, sugars or sodium. Although the studies show that these symbols amount to an improvement against the traditional nutritional information(6,7) and that they are better understood, recent studies(8,9,10) conducted by Uruguayan and Brazilian researchers, which compare the stop signals to the traffic-light, clearly show how the former system is more effective in terms of being identified on the packaging, communicating the information in a comprehensible way for the consumer and improving food selection (making it healthier).

Although it may be considered that a food label which gives more information is more efficient to communicate its purpose (how healthy or unhealthy such food is), this is not the case regarding eating decisions. This situation may derive from the mixture of several events, for instance, the great complexity of the subject of nutrition, which demands that the information be presented as simply as possible. Conversely, it should be understood that many of our decisions are not rational. There are decisions that we have to make guite often, as is the case of food (several times a day). Those decisions are generally made with little consideration, and they differ from other decisions made a few times in life, such as the purchasing of a car or whom to marry. In this manner, although traffic lights help understand how healthy a food product is, at the time of making short and frequent decisions, it is highly likely that - if a cognitive effort is made - it will be to count the number of black stop signals instead of trying to understand if 2 green + 1 orange + 1 red signals are more or less healthy than 1 green + 3 orange signals.

In June 2018, under Executive Order No. 012-2018-SA⁽¹¹⁾ issued by the government of Peru, the *Manual on Advertising Warnings* [Manual de Advertencias Publicitarias] came into effect; therefore, we can only celebrate the result of the Peruvian process.

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