



**CONSUMERS
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FOR CHANGE

**PROMOTING HEALTHY AND
SUSTAINABLE DIETS IN SOUTH ASIA:
POLICY REPORT**

RESOLVE 
 **TO SAVE LIVES**
AN INITIATIVE OF VITAL STRATEGIES

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ABOUT CONSUMERS INTERNATIONAL

Consumers International is the membership organisation for consumer groups around the world. We believe in a world where everyone has access to safe and sustainable goods and services. We bring together over 200 member organisations in more than 100 countries to empower and champion the rights of consumers everywhere. We are their voice in international policy-making forums and the global marketplace to ensure they are treated safely, fairly and honestly. We are resolutely independent, unconstrained by businesses or political parties. We work in partnership and exercise our influence with integrity, tenacity and passion to deliver tangible results.

ABOUT RESOLVE TO SAVE LIVES

Resolve to Save Lives is an initiative of the global health organization Vital Strategies focused on preventing 100 million deaths from heart disease and making the world safer from epidemics. It is led by Dr. Tom Frieden, former director of the US Centers for Disease Control and Prevention. To find out more visit: <https://www.resolvetosavelives.org> or Twitter @ResolveTSL.

INTRODUCTION

Global progress towards United Nations (UN) Sustainable Development Goal 2 – to ‘end hunger, achieve food security and improved nutrition, and promote sustainable agriculture by 2030’ – has been hampered by a persistent failure to embrace the need for complementary solutions to the challenges of food safety, security, sustainability, and nutrition.¹ This is certainly true in both India and Bangladesh, where recent decades have delivered gradual progress towards reducing hunger, but increasingly unhealthy diets have caused a mounting public health crisis, while soaring carbon emissions pose a threat to the long-term resilience of food systems in the region.²

As the COVID-19 pandemic and the growing impacts of climate change threaten to reverse even the advances made on food security, South Asia is at a crossroads. There can be no question that rebuilding food systems will be a central pillar in the region’s economic recovery – but this period of rebuilding is also a window of opportunity, a chance to develop a cross-cutting strategy for the development of a food system that addresses all aspects of SDG2, meeting the entire population’s right to safe and healthy food that has been produced fairly and sustainably. These challenges must be seen not merely as trade-offs to be balanced, but as interlocking pieces in the food systems puzzle.

Delivering healthy and sustainable diets

One of the greatest obstacles to food systems transformation in South Asia is the scale of the challenge – shifting the consumption patterns of more than 1.5 billion people to more healthy and sustainable diets is no easy task. The burden of this shift cannot fall solely on consumers themselves, who face a number of substantial barriers to dietary change:

- Accessibility – the lack of healthy and sustainable food products available to purchase, as private and public suppliers alike favour cheaper options.
- Affordability – the often prohibitive cost to consumers of healthy and sustainable options.
- Information – the lack of transparency on the nutritional and environmental credentials of different food products.

Overcoming these barriers is an essential part of delivering the shift to healthy and sustainable diets, and the governments of India and Bangladesh must play their part in this process, enabling and empowering consumers to make better choices. In designing interventions to achieve this, it is crucial that policymakers don’t overlook the most valuable asset available to them: the voices of consumers themselves.

South Asia is at the heart of the global consumer movement, and the food systems of India and Bangladesh already benefit from the activities of consumer groups, which include educating and informing consumers; carrying out food safety testing; building cross-sectoral alliances; and even providing food directly to vulnerable consumers. No-one understands consumer rights and needs

¹ UN, Sustainable Development Goal 2, <https://www.un.org/sustainabledevelopment/hunger/>

² Economist Intelligence Unit, Global Food Security Index, <https://foodsecurityindex.eiu.com/index>
The Lancet, Global Burden of Disease Resource Centre, <https://www.thelancet.com/gbd>
European Commission Joint Research Centre, EDGAR-FOOD, <https://ec.europa.eu/jrc/en/science-update/edgar-food>

better than these organisations – by including them in the policy process, governments can create interventions that genuinely work for consumers, unlocking their potential to be a driving force behind food systems change.

Policy recommendations

This report is the product of a pioneering collaboration between six prominent consumer groups across both countries – Citizen consumer and civic Action Group (CAG), Consumer Education and Research Centre (CERC), Consumer Unity and Trust Society (CUTS), Consumer Voice, Mumbai Grahak Panchayat (MGP), and the Consumers Association of Bangladesh. Ahead of the 2021 United Nations Food Systems Summit, these six organisations came together with policy experts convened by Resolve to Save Lives, an initiative of Vital Strategies, to produce a set of cross-cutting recommendations for promoting healthy and sustainable diets.³

This policy report will expand on these recommendations, split into six key areas:

- Consumer information
- Marketing and advertising
- Food standards
- Fiscal policy
- Public procurement and distribution
- Supply chain investment

A set of priority actions will be outlined in each area, identifying where change is most urgently needed by consumers. We hope that this report can be the launchpad for a more collaborative food policy process in South Asia, developing relationships between consumers and policymakers, as well as across national and regional borders. Through these alliances we can work to build a more holistic approach to food systems transformation, recognising the interlocking nature of the challenges we face, and the need for co-operation to develop effective and inclusive solutions.

³ Consumers International, ‘Promoting healthy and sustainable diets in South Asia: A consumer advocacy perspective’, <https://www.consumersinternational.org/media/368845/statement-promoting-healthy-and-sustainable-diets-in-south-asia.pdf>

SUMMARY OF RECOMMENDATIONS

- 1 – Introduce mandatory front-of-pack labelling**
- 2 – Educate consumers on healthy and sustainable consumption**
- 3 – Introduce regulations on marketing to children**
- 4 – Establish implementation and enforcement systems for marketing regulation**
- 5 – Set mandatory targets for reformulation of packaged foods**
- 6 – Strengthen safety standards for street food**
- 7 – Promote voluntary sustainability certification markers**
- 8 – Develop an integrated food standards monitoring and enforcement system**
- 9 – Introduce taxes on unhealthy food products**
- 10 – Subsidise healthier and more sustainable options**
- 11 – Introduce national legislation and guidance on public procurement**
- 12 – Establish health and sustainability targets for publicly procured food**
- 13 – Support local food systems and supply chains**
- 14 – Invest in infrastructure to tackle loss and waste**

CONSUMER INFORMATION

Improving the information and education provided to consumers is an important tool for supporting healthy and sustainable diets in India and Bangladesh. Consumers have the right to know whether particular food products meet necessary nutritional and environmental criteria, and should be educated on how (and why) to follow a healthy and sustainable diet.

Recommendation 1: Introduce mandatory front-of-pack labelling

Front-of-pack labels are an effective and efficient means of communication with consumers at the point of purchase. Simple and easy-to-understand nutrition labels, featured prominently on packaged food, help consumers to avoid excessive consumption of foods high in nutrients of concern. Mandatory labels can discourage the consumption of unhealthy foods and beverages, while also motivating manufacturers to reformulate their products to make them healthier.⁴

Consumer advocates in India and Bangladesh recommend the implementation of mandatory front-of-pack ‘high in’ warning labels for foods high in salt, sugar, and saturated fat.⁵ Quick, informed consumer decision-making requires simple and straightforward labelling options – while warning labels contain less information than other front-of-pack labelling systems, visual messages are more likely to influence consumer behaviour, and are inclusive of consumers who speak vernacular languages, or who are unable to read.

Labelling regulation should be based on a scientifically robust nutrient profile model that sets clear criteria for labels, and the policy development process should draw on international guidelines and best practices.⁶ Regulators in India and Bangladesh should develop a strategy to pre-empt and counter opposition in a well-coordinated manner, for instance by setting up an independent expert advisory committee to legitimise policy options in the face of industry opposition.

Recommendation 2: Educate consumers on healthy and sustainable consumption

All of the consumer-facing policy recommendations included in this report would benefit from targeted efforts to educate consumers about their importance, at both national and regional level. For example, the implementation of education campaigns to raise awareness of the meaning of new labels is a key component of successful regulation. Consumer organisations can play a valuable role in informing consumers, but this must be complemented by government-funded education efforts.

⁴ WHO, ‘Guiding principles and framework manual for front-of-pack labelling for promoting healthy diet’, <https://www.who.int/nutrition/publications/policies/guidingprinciples-labelling-promoting-healthydiet.pdf?ua=1>
FAO, ‘Second International Conference on nutrition outcome document: framework for action’, <http://www.fao.org/3/mm215e/mm215e.pdf>

⁵ WHO, ‘Front-of-package labelling’, <https://www.paho.org/en/topics/front-package-labeling>

⁶ Vital Strategies and University of North Carolina at Chapel Hill, ‘What’s in Our Food? A guide to introducing effective front-of-package nutrient labels’, <https://www.vitalstrategies.org/wp-content/uploads/Whats-in-Our-Food-guide-to-introducing-front-of-package-labels.pdf>

Consumer education should also seek to increase consumers' awareness of what makes up a healthy and sustainable diet; national dietary guidelines can be a helpful tool for building understanding, and should also be used by governments to support standard setting and food policy development. Incorporating food education into the school curriculum can help shape the behaviour of the next generation of consumers, while mass media campaigns are an effective tool for reaching a broad range of consumers. Existing consumer awareness campaigns in India and Bangladesh should be expanded to include information on sustainability as well as on health, and governments should support and incentivise innovative approaches to consumer sustainability information, such as Food-Info-Marts, which connect producers and consumers to learn about the ecological footprints of food.⁷

⁷ One Planet Network, 'Promoting sustainable food consumption in India', <https://www.oneplanetnetwork.org/initiative/promoting-sustainable-food-consumption-india>

MARKETING AND ADVERTISING

Marketing and advertising have significant influence over consumer food choices, and can be especially harmful in promoting unhealthy food to children. Greater regulation is needed in India and Bangladesh of digital marketing in particular, as well as of marketing in schools and retail stores, or through event sponsorship, celebrity endorsement, or food label promotions.

Recommendation 3: Introduce regulations on marketing to children

Marketing restrictions can promote healthier diets by restricting children's exposure to products high in salt, sugar, and saturated fat. There is an overwhelming international consensus calling for the implementation of marketing restrictions which protect children up to the age of 18, in line with the responsibility of governments to protect children's right to health.⁸ The WHO recommends a comprehensive regulatory approach to protect children and deliver healthier diets.⁹

Recommendation 4: Establish implementation and enforcement systems

Successful marketing regulations require sensitive stakeholder engagement and robust policy design. Marketing restrictions should be designed in accordance with international guidance and lessons from other countries, in addition to a careful review of the national context. Restrictions should be mandatory rather than self-regulated, and address all forms of marketing (including through social media, in-store, television, radio, internet games, celebrity endorsements, sponsorship of children's events).¹⁰

Mechanisms to shield the policy development process from commercial interests should be established in order to avoid delay and protect the consumer interest.¹¹ The policy framework should also include provisions for implementation and enforcement mechanisms, including clear definitions of sanctions, and systems for reporting complaints.

⁸ UNICEF, 'A Child Rights-based Approach to Food Marketing: A Guide for Policy Makers', https://sites.unicef.org/csr/files/A_Child_Rights-Based_Approach_to_Food_Marketing_Report.pdf

⁹ WHO, 'Set of Recommendations on the Marketing of Foods and non-alcoholic beverages to children' https://apps.who.int/iris/bitstream/handle/10665/44416/9789241500210_eng.pdf

¹⁰ World Cancer Research Fund International, 'Building Momentum: Lessons on implementing robust restrictions of food and non-alcoholic beverage marketing to children', <https://www.wcrf.org/wp-content/uploads/2021/01/PPA-Building-Momentum-3-WEB-3.pdf>

¹¹ Amandine Garde et al, 'Implementing the WHO recommendations whilst avoiding real, perceived or potential conflicts of interest', <https://www.cambridge.org/core/journals/european-journal-of-risk-regulation/article/abs/implementing-the-who-recommendations-whilst-avoiding-real-perceived-or-potential-conflicts-of-interest/A252CCB3D00E595F68B5E8797BA484E2>

FOOD STANDARDS

Strategically chosen and strictly enforced food standards are key to delivering healthy, safe, and sustainable food for all. Mandatory standards set by the Food Safety and Standards Authority of India (FSSAI) and the Bangladesh Food Safety Authority (BFSA) protect consumers by ensuring that all food products meet certain minimum conditions. However, more must be done to strengthen standards and improve implementation.

Recommendation 5: Set mandatory targets for reformulation of packaged foods

Standards can be an effective tool for eliminating harmful elements from diets, as in the case of India's tightening of restrictions on industrially produced trans fat, limiting its presence in packaged food to 2% of total fat content, drawing on WHO efforts to eliminate trans fat from diets worldwide.¹² Bangladesh should follow India's example in setting a structured transition schedule which gives food producers time to test and reformulate products, and governments in both countries should take necessary steps to ensure that regulations are effectively implemented.

Similar targets for the reformulation of packaged foods high in salt, sugar, and saturated fat should also be implemented.¹³ Comprehensive targets are the most effective way to ensure the healthiness of packaged food, either as mandatory regulation or as part of a voluntary initiative. Voluntary approaches can be initiated quickly and are more flexible, but require considerable input from government to monitor progress and encourage companies to comply. In the long-term, a mandatory approach will therefore be necessary. Consumer organisations can play a key role in building support for such interventions, whether voluntary or mandatory.

Recommendation 6: Strengthen safety standards for street food

Street food is a significant part of the diet of a growing number of consumers in India and Bangladesh. Food safety standards should establish sanitary and hygienic requirements for street food vendors, for example around cleaning vending premises, handling and storing food safely, and keeping food safe from contamination.

In Bangladesh there is a particular need for the introduction of street food standards, as it grows into a specialised industry. Rules should be formulated jointly between the BFSA, the City Corporation, the Bangladesh Standards and Testing Institution (BSTI), and the Directorate of National Consumer Rights Protection. India's Food Safety and Standards Act contains strong science-based requirements for street food vendors, but implementation needs to be strengthened through enhanced monitoring and enforcement.¹⁴ Governments should invest in campaigns which train street vendors in good safety and hygiene practices.

¹² WHO, 'Replace Trans Fat Action Package', <https://www.who.int/teams/nutrition-and-food-safety/replace-trans-fat>

¹³ WHO, 'WHO global sodium benchmarks for different food categories', <https://www.who.int/publications/i/item/9789240025097>

¹⁴ FSSAI, 'The Food Safety and Standards Act', https://www.indiacode.nic.in/bitstream/123456789/7800/1/200634_food_safety_and_standards_act%2C_2006.pdf

Recommendation 7: Promote voluntary sustainability certification markers

Consumers have a right to food that is sustainable as well as healthy. Consumers buying food products with organic certification markers, for example, should be confident that these products conform to national requirements. Standards on organic production in India and Bangladesh should be promoted simultaneously to agricultural producers and to domestic consumers, in order to support and facilitate demand for more sustainable food products. Governments should prioritise consumer education on the meaning of logos such as 'Jaivik Bharat' or 'Eco Mark', in collaboration with consumer advocacy organisations.¹⁵

Recommendation 8: Develop an integrated monitoring and enforcement system

Monitoring and enforcement of new and existing regulation is imperative for policy initiatives to have a positive impact on consumers' diets. One reason for the gap between standards and their implementation is a lack of food testing; both India and Bangladesh have accredited public food testing laboratories, but these are currently underutilised due to shortages of staff and equipment. Governments should invest in creating fully accredited food testing labs which can be used by consumer organisations to support this process.

A lack of coordination between agencies is another barrier to the effective monitoring and enforcement of standards. In Bangladesh, the BFSA and BSTI should sign Framework Agreements or a Memorandum of Understanding to enhance coordination, while in India, coordination between the FSSAI and state officials charged with monitoring and enforcement is a priority. Consumers should also be integrated into the monitoring system, through online platforms for citizen reporting, and regional as well as national helplines.

¹⁵ FSSAI, 'Jaivik Bharat', <https://jaivikbharat.fssai.gov.in>

Bureau of Indian Standards, 'Eco Mark', <https://bis.gov.in/index.php/product-certification/operation-of-eco-mark-scheme/>

FISCAL POLICY

Innovative taxes and subsidies are a key vehicle through which governments can incentivise healthy and sustainable diets, while simultaneously ensuring that these options remain accessible and affordable. Governments should be sure to balance food taxes with subsidies for healthier and more sustainable options, to ensure that vulnerable consumers do not bear the burden of increased prices.

Recommendation 9: Introduce taxes on unhealthy food products

A first step for governments is to introduce taxes on products that fail to meet nutritional or environmental standards, such as ultra-processed foods (especially those high in salt, sugar, or saturated fat).¹⁶ As well as discouraging unhealthy or unsustainable consumption, these taxes incentivise suppliers to reformulate products and improve supply chain standards, bringing further benefit to consumers. Such taxes can also generate revenue for further public spending in support of healthy and sustainable diets, for instance on consumer education, food testing, or investment in supply chain infrastructure.

Recommendation 10: Subsidise healthier and more sustainable options

It is essential that taxes on unhealthy food are balanced out by subsidies enabling better choices, so as not to undermine the food security of those who could previously afford only cheaper, healthier options. This can be done first and foremost at consumer level, by subsidising the purchasing of healthy food, in parallel with social protection and cash transfer schemes for vulnerable consumers.¹⁷

Agricultural subsidies are an important vehicle for incentivising healthy and sustainable food production; regulations should be introduced to prevent public money from being used to subsidise the production of unhealthy or unsustainable foods, and governments should instead incentivise farmers to move away from the dangerous or excessive use of chemical fertilisers and pesticides, or animal antibiotics.¹⁸

¹⁶ WHO, 'Fiscal Policies for Diet and Prevention of Noncommunicable Diseases', https://www.who.int/docs/default-source/obesity/fiscal-policies-for-diet-and-the-prevention-of-noncommunicable-diseases-0.pdf?sfvrsn=84ee20c_2

¹⁷ WHO, 'Using price policies to promote healthier diets', https://www.euro.who.int/__data/assets/pdf_file/0008/273662/Using-price-policies-to-promote-healthier-diets.pdf

¹⁸ FAO, 'Enabling Sustainable Food Systems: Innovators' Handbook', <http://www.fao.org/3/ca9917en/CA9917EN.pdf>

PUBLIC PROCUREMENT AND DISTRIBUTION

The public procurement of food is an opportunity for governments to lead by example, ensuring that healthy, safe and sustainable food is prioritised. This is especially important given the particular reliance of economically vulnerable consumers on publicly procured food. A range of policy actions are needed to establish a procurement and distribution system that not only champions health and sustainability, but also works efficiently to ensure that everyone has access to food.

Recommendation 11: Introduce national legislation and guidance on procurement

The lack of an effective national public procurement strategy can lead to slipping standards, and exacerbate regional inequalities. While local governments are best placed to manage the public procurement and distribution of food, comprehensive central legislation is needed to govern this process, ensuring uniformity of standards and facilitating the sharing of expertise and best practices. This legislation should prioritise the safeguarding of nutrition, food safety, and sustainability standards, while empowering regional governments to respond flexibly to local circumstances.

National procurement strategies should pay particular attention to the needs of low-income consumers, who are most reliant on public procurement, and are being let down by the distribution of unsafe or unhealthy food. Robust monitoring is needed to maintain standards and prevent malpractice in public procurement.

Recommendation 12: Establish health and sustainability targets for procured food

Nutritional dietary guidelines in India and Bangladesh are rarely effectively implemented in practice; reorienting public procurement to prioritise the distribution of healthy food in keeping with these guidelines would deliver substantial progress towards promoting healthy diets.¹⁹ This should be a particular priority in schools, where the creation of healthy food environments can have a life-long positive impact on eating behaviours. Governments should also develop a strategy for increasing sustainability standards in publicly procured food; promoting the purchasing of locally-produced food is an important first step towards this goal, and can also benefit public health by increasing access to fresh fruits and vegetables.²⁰

¹⁹ FAO, 'Food-based dietary guidelines – Bangladesh', <http://www.fao.org/nutrition/education/food-dietary-guidelines/regions/countries/Bangladesh/en>

FAO, 'Food-based dietary guidelines – India', <http://www.fao.org/nutrition/education/food-dietary-guidelines/regions/countries/india/en/>

²⁰ WHO, 'Action framework for developing and implementing public food procurement and service policies for a healthy diet', <https://www.who.int/publications/i/item/9789240018341>

SUPPLY CHAIN INVESTMENT

The majority of food supplied to consumers in India and Bangladesh comes through private sector supply chains, which governments have less control over. It is nonetheless essential that these supply chains are included within the process of food systems transformation; governments can support the development of inclusive and sustainable supply chains by investing in food systems infrastructure at local and national level, and by incentivising private sector or civil society initiatives that support the development of sustainable, local food systems.

Recommendation 13: Support local food systems and supply chains

Consumers and producers alike benefit from short, straightforward food supply chains that help keep prices fair for all, while also minimising environmental impact.²¹ Governments can play a part in this process by promoting and investing in initiatives to streamline supply chains, such as those that connect producers and consumers directly. Another key element of supporting local food systems is strengthening digital capacity, especially in rural settings and for vulnerable consumers. Governments should invest in improving access to digital marketplaces, while ensuring that data protections and privacy are built into the design of e-commerce platforms.²²

Recommendation 14: Invest in infrastructure to tackle loss and waste

Large amounts of food are lost and wasted all along supply chains in India and Bangladesh, at great cost to consumers and the environment. Governments should invest in transport and logistics infrastructure, such as improved road and rail services, warehousing, and cold food storage, to minimise food loss. Action is also needed to tackle plastic packaging waste, another side effect of the prevalence of ultra-processed packaged food. As well as introducing regulation to set standards on the use and contents of plastic packaging, governments can draw on fiscal policy measures to incentivise food suppliers to use more easily recyclable or biodegradable materials. Consumers can also be supported to reduce waste through government investment in recycling initiatives, and the provision of clearer information on how to dispose of food packaging.

²¹ New Food, 'Supply chains must be shortened and localised, urges FAO', <https://www.newfoodmagazine.com/news/108982/supply-chains-must-be-shortened-and-localised-urges-fao/>

²² OECD, 'Consumer protection in e-commerce', <https://www.oecd.org/sti/consumer/ECommerce-Recommendation-2016.pdf>

CONCLUSION: LOOKING BEYOND THE SUMMIT

While the Indian and Bangladeshi governments hold the power to kick-start a process of food systems transformation in South Asia, the shift to healthy and sustainable diets cannot be achieved by policy and regulation alone. The UN Food Systems Summit represents a valuable opportunity for dialogue and commitments to action on a global stage, but the real test will come in the months and years that follow, as commitments and recommendations must be turned into practical actions, which in turn need to be effectively implemented and enforced.

Both governments will have to draw on a cross-sectoral coalition to support them in this process, and it is crucial that consumers themselves are not excluded from this coalition. This report has emphasised the importance of breaking down barriers to healthy and sustainable diets, rather than expecting consumers to bear this burden alone – however, this does not mean that the power and agency of consumers in helping to eliminate these barriers should be underestimated.

Consumer advocates can be valuable participants in the processes of policy design, implementation, and evaluation, combining expert knowledge of consumer rights and food policy with a close understanding of the needs and experiences of consumers across India and Bangladesh. The recommendations outlined here offer an insight into the value that consumers can bring to the table, but it is essential that this year's summit is just the starting point of a more active and engaged relationship between governments and consumer advocates in South Asia.

ACKNOWLEDGEMENTS

This report was developed in response to the food systems challenges and solutions identified by six consumer organisations across India and Bangladesh:

Citizen Consumer and Civic Action Group

Consumer Education and Research Centre

Consumer Unity and Trust Society

Consumer Voice

Consumers Association of Bangladesh

Mumbai Grahak Panchayat

Additional guidance on policy recommendations was provided by:

Resolve to Save Lives, an initiative of Vital Strategies

Consumers International

National Heart Foundation of Bangladesh

Public Health Foundation of India

The George Institute for Global Health

This report was produced with support from Consumers International, the global membership organisation bringing together over 200 consumer groups across more than 100 countries. The recommendations outlined within this report reflect the priorities of six consumer organisations across India and Bangladesh, but do not necessarily represent a global position held by all Consumers International members.