

October 11, 2024

**Comment on *Nutrition labelling policies: WHO draft guideline for public consultation***

The Center for Science in the Public Interest commends the World Health Organization (WHO) for developing a Guideline to support its Member States in formulating and implementing policies related to ingredients labeling, nutrient declarations, front-of-package labeling (FOPL), and nutrition and health claims. Our primary recommendation is to strengthen the Guideline by explicitly recommending government-mandated interpretive FOPL policies comprised of nutrient warning labels. Please find our detailed recommendations below.

**1. The Guideline should explicitly recommend mandatory, government-led FOPL policies.**

- The current recommendation that FOPL should be applied “universally” is unclear, as it does not specify what actions are necessary for achieving universal application.
- Furthermore, the document defines “policies” as including both government-led and industry-led measures.
- Real-world evidence consistently demonstrates that voluntary FOPL policies fail to achieve universal application and are less effective than government-mandated FOPL policies at spurring healthier food choices and product reformulation.

**2. The Guideline should amend its definition of interpretive versus non-interpretive FOPL and should specifically recommend one type of interpretive FOPL: nutrient warning labels.**

- We recommend amending the definition of FOPL on p. 6 of the draft guideline as follows: “Interpretive FOPL provides at-a-glance guidance on the relative healthfulness and/or unhealthfulness of the **overall** food product or **relative levels of specific nutrients**. Non-interpretive FOPL provides **quantitative** information on nutrient content, but does not provide ~~advice or direction on~~ **any additional guidance regarding** the nutritional value of the food to facilitate understanding and assist with purchasing decisions.” These amendments would clarify that nutrient warning labels are a form of interpretive FOPL and that interpretive FOPL can be used to provide objective guidance rather than advice or direction.
- Nutrient warning labels are the only type of interpretive FOPL supported by real-world evidence demonstrating an association with improvements in the healthfulness of food purchases.

**3. The Guideline should explicitly recommend against the sole use of endorsement labels that signal products as “healthy” and only present positive information in the absence of other interpretive FOPL such as nutrient warning labels.**

- There is very limited evidence showing that endorsement labels on their own can have a positive impact on consumers’ understanding of products’ nutritional content or on the healthfulness of consumers’ product selection compared to other types of FOPL. However, some evidence suggests that positive endorsement labels can be useful when combined with interpretive FOPL such as nutrient warning labels.

**4. The Guideline should provide more detailed guidance on the importance of label design.**

- Member States should be informed that certain graphic and linguistic elements have been shown to enhance the salience and interpretability of FOPLs.
- For maximum public health impact, evidence suggests that labels should be:

- be highly visible and salient
  - convey a simple and easy-to-understand message(s)
  - limit or avoid numeric information
  - use symbols and colors that leverage automatic associations to help consumers interpret nutrition information quickly and accurately
  - integrate informational and emotional messaging
  - caution consumers using words/phrases like excess, high in, avoid, or warning
- Moreover, it is crucial to emphasize the importance of testing different design elements across diverse population groups to ensure FOPLs are well-understood by all.
5. **The Guideline should not state that FOPLs are inappropriate for foods directed at young children.**
- Commercially prepared baby foods and follow-up formulas are among the first foods introduced to young children and may be high in added sugars, despite the WHO’s recommendation that parents not feed foods with added sugar to children under two years old. FOPLs could help parents identify products high in nutrients of concern, reduce purchases of such products, and prompt manufacturers to reduce the amount of nutrients of concern added to products directed at infants and toddlers.
6. **The Guideline should more clearly define “nutrient declarations” as non-interpretive labels and emphasize that, although important for transparency, such labels are insufficient and should be paired with interpretive FOPL.**
- The term “nutrient declarations,” as defined in the Guideline, can refer to various types of labels, including both back-of-package (e.g., Nutrition Facts Panel) and front-of-package formats (e.g., Guideline Daily Amounts). The broad definition of this term could create confusion.
  - Use and understanding of non-interpretive labels are low, and there is little to no evidence that such labels influence dietary behavior.
7. **The Guideline should recommend that FOPL policies contain restrictions on nutrition and health claims such that these claims are not permitted on products that carry nutrient warning labels.**
- We strongly support the WHO’s recommendation to protect consumers from deceptive nutrition and health claims and urge the WHO to expand this recommendation as it relates to FOPL.
8. **The Guideline should acknowledge the need to provide ingredient lists, nutrition declarations, and FOPL both on the physical food package *and* at the point of selection when food are offered for sale via e-commerce.**
- Online food purchasing is becoming increasingly popular.
  - Consumers need to be able to access basic health and nutrition-related information no matter where or how they purchase their food.

Thank you for considering these recommendations and for your commitment to developing a Guideline to support Member States in developing and implementing effective nutrition labeling policies.

Sincerely,

Center for Science in the Public Interest

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