Advances in implementation of Decree 272/018 on Front-of-Package labelling of foods packaged in the absence of customer

Pushing and Pulling: The Caribbean Experience moving towards Front-Of-Package Nutrition Labels

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Outline

• Background
• Front-of-package labelling
• Decree 272/018 on Front-of-package labelling
• Barriers for implementation
• Challenges for implementation
Top 10 DALYS by risk factors in Uruguay, 2007 – 2017

<table>
<thead>
<tr>
<th>2007 ranking</th>
<th>2017 ranking</th>
<th>% change 2007-2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tobacco</td>
<td>Tobacco</td>
<td>-12.2%</td>
</tr>
<tr>
<td>Dietary risks</td>
<td>Dietary risks</td>
<td>-10.1%</td>
</tr>
<tr>
<td>High fasting plasma glucose</td>
<td>High fasting plasma glucose</td>
<td>-0.1%</td>
</tr>
<tr>
<td>High blood pressure</td>
<td>High body-mass index</td>
<td>4.3%</td>
</tr>
<tr>
<td>High body-mass index</td>
<td>High blood pressure</td>
<td>-6.3%</td>
</tr>
<tr>
<td>High LDL</td>
<td>Alcohol use</td>
<td>4.7%</td>
</tr>
<tr>
<td>Alcohol use</td>
<td>High LDL</td>
<td>-8.8%</td>
</tr>
<tr>
<td>Malnutrition</td>
<td>Occupational risks</td>
<td>3.5%</td>
</tr>
<tr>
<td>Air pollution</td>
<td>Malnutrition</td>
<td>-23.9%</td>
</tr>
<tr>
<td>Occupational risks</td>
<td>Air pollution</td>
<td>-14.7%</td>
</tr>
</tbody>
</table>

Overweight and obesity in Uruguay

Overweight in adults 25 to 64 years (BMI ≥ 25 kg/m²)

<table>
<thead>
<tr>
<th>Year</th>
<th>Overweight</th>
<th>Obesity</th>
</tr>
</thead>
<tbody>
<tr>
<td>1998*</td>
<td>52.5%</td>
<td></td>
</tr>
<tr>
<td>2006**</td>
<td>56.6%</td>
<td></td>
</tr>
<tr>
<td>2013**</td>
<td>64.9%</td>
<td>10.2%</td>
</tr>
</tbody>
</table>

Dietary patterns, Uruguayan population

• 90.9% of adults consume less than 5 portions of fruits and vegetables per day.
  STEPS 2013

• 24.4% of adolescents consume five or more times per day fruits and vegetables.
  GSHS 2012

• 1 of every 5 children 2 to 6 years of age drinks sweetened beverages when thirsty.
  ENDIS 2nd. Survey

• 7 of 10 adolescents drink sweetened beverages every day.
  GSHS 2012

• 1 of 10 adolescents eats fast foods 3 or more times per week.
  GSHS 2012
Shifts in dietary patterns

- SSB sales tripled between 1999 and 2013, from 45.4 liters per person per year to 123.7*
- Sales of ultra-processed products almost doubled, from 15.2 kilograms per person per year to 25.6*
- Affordability of SSBs increased at a yearly rate of 3.5% between 1997 and 2016**


Ultra processed products here include carbonated soft drinks, sweet and savory snacks, breakfast cereals, confectionery (candy), cream, biscuits (cookies), fruit and vegetable juices, sports and energy drinks, ready-to-drink tea or coffee, spreads, sauces, and ready-meals. Quantity in liters is converted into kilograms. Sales data are from the Euromonitor Passport Database (2014) (38).
National Health Objectives 2020

1. FAVORECER ESTILOS DE VIDA Y ENTORNOS SALUDABLES Y DISMINUIR LOS FACTORES DE RIESGO
   - Número de Instituciones libres de humo
   - Plan Intersectorial de Alimentación Saludable y de Actividad Física
   - ≤5% Anemia moderada en niñas/os de 6 – 23 meses
   - ≤3% Retraso de crecimiento niñas/os de 2 a 4 años
   - ≥20% Fumadores actuales de 15 años y más

2. DETENER EL AUMENTO DEL SOBREPeso y la obesidad
   - Procesos de mejora en la regulación del consumo de alcohol
   - Percepción de riesgo sobre consumo de Cannabis
   - ≥5% Proceso normativo para uso racional de psicofármacos
National policy for prevention of overweight and obesity

• Lines of action
  – Communication for behavioral and cultural change
  – Breastfeeding and complementary feeding practices in young children
  – Regulation of marketing of breastmilk substitutes
  – Dietary guidelines for the Uruguayan population integrated in public policies
  – Strengthening of food and physical activity in school environments (Law 19.140 on healthy diets in schools, 2013)
  – Progressive elimination of industrial trans fat (Decree 114/2018, entry into force, October 2019)
  – Front-of-package labelling
  – Voluntary reduction of salt and sugar in processed foods program
  – National program for control of overweight and obesity within the National Integrated Health System

• Decree 369/018, 9 de November 2018, creating the National Honorary Council of Policies for prevention of overweight and obesity *

* Available at: https://www.impo.com.uy/bases/decretos/369-2018
Front-of-package labelling

Objective
• Provide objective information to the population, through a simple and accessible tool, that allows the identification of packaged foods with excessive content of critical nutrients

Scope
• Focused on nutrients that are associated to the development of obesity and NCDs
Front-of-package labelling
Process of development and implementation

- Intersectoral working group convened – August 2016
- Review and analysis of evidence – National evidence
- Identification of critical nutrients and threshold to define excess – PAHO nutrient profile model
- Graphic system for FOP – National evidence
- Development of draft decree
- National and international public consultation – June to August 2017
- Flexibilization of criteria and increase of timeframe for implementation in draft decree
- Approval of Decree in Cabinet ministers (29 August 2018) and bill sent to Parliament
- Regulation implementation – 31 August 2018 to 1 March 2020
- Monitoring and evaluation – 2019 to 2022
Nutrient Profile Model and graphic system

<table>
<thead>
<tr>
<th>Nutrient</th>
<th>PAHO NMP</th>
<th>Decree 272/018 – Annex II</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sodium</td>
<td>1 mg per 1 kcal or 360 mg per 100 g</td>
<td>8 mg per 1 kcal or 500 mg per 100 g</td>
</tr>
<tr>
<td>Sugar</td>
<td>10% of total caloric value</td>
<td>20% of total caloric value and 3 g per 100 g</td>
</tr>
<tr>
<td>Fat</td>
<td>30% of total caloric value</td>
<td>35% of total caloric value</td>
</tr>
<tr>
<td>Saturated fat</td>
<td>10% of total caloric value</td>
<td>12% of total caloric value</td>
</tr>
</tbody>
</table>

Each symbol should be placed in the front of the package. The size of the symbol according to the area of the front of the package.
Decree 272/018 on Front-of-Package labelling

• Approved in Cabinet on 29 August 2018
• Decree incorporated to National Food Regulation, 1994
• Provides 18 months to importers/producers to adapt to the regulation
• Recommends to include activities in schools to promote a healthy diet
• Importers/producers are responsible for accuracy and legibility of the FOP label
• Characteristics of the system are described in annexes
Advances on implementation of Decree 272/018

31 August 2018

Publication on gazette

18 months

Process in MERCOSUR for a Technical Regulation

1 March 2020

Application of FOP

1. Modification of authorization and registry process
2. Request of complementary information
3. Ordinance 160/019
4. Guidelines for monitoring and evaluation
5. Baseline

Practical issues and frequent questions

- Guidelines on placement and size of labels in Application Manual
- Use of claims and other labelling schemes is allowed by current regulation
- All imported/national products have to comply
- Imported products: use of stickers allowed
- Returnable bottles can show seal in bottle cap until March 2023
Barriers for implementation

• Administrative actions presented by national industry
• Objections presented in MERCOSUR and PARLASUR from the trade sectors of Argentina and Paraguay
• Brazil sent several questions and comments directly and through TBT Committee
• Specific trade concern in WTO by Argentina, Colombia, Costa Rica, European Union, Guatemala and USA (initially withdrew by Colombia)
Challenges for implementation

• Baseline developed in coordination with Intendencia de Montevideo (local government).
• Guidelines for enforcement in coordination with local governments
• Communication to general population
• Impact evaluation, in coordination with University of the Republic
Thank you!

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