**Open letter in response to assertions of the Jamaica Manufacturers and Exporters Association (JMEA) 2 March 2021**

In response to several concerns presented by the Jamaica Manufacturers and Exporters Association (JMEA) by way of newspaper articles published on March 2\textsuperscript{nd}, we the undersigned global researchers and experts on healthy food policies and noncommunicable diseases (NCDs) have responded to their concerns with evidence from studies and other evidence collected without conflicts of interest.

The science is clear on the role of foods and beverages high in energy, added sugar, sodium, and saturated fat on health: excessive consumption of these unhealthy foods and beverages is one of the key causes of obesity and its related diseases.\textsuperscript{1-6} We therefore strongly support the use of Front of package (FOP) warning labels as a critical measure to inform consumers, curb consumption of these unhealthy food products, and subsequently, address diet-related diseases.

Over the past decade, a large and growing number of studies have found that highly processed foods (known as ultra-processed foods or UPF) are major factors impacting the risk of weight gain and nutrition-related NCDs. A recent study showed that shifting from a real food-based diet in normal weight individuals to one composed of ultra-processed foods was linked with a 1.1kg weight gain over a 2-week period.\textsuperscript{1} This suggests that in the Caribbean, where purchases of ultra-processed foods and beverages is rapidly increasing, there may be population level excessive weight gain and further cases of diet related NCDs if no policy measures are taken.

Moreover, over 35 cohort studies have shown that increased UPF consumption has a significant impact on the risk of obesity, diabetes, hypertension, dyslipidemia, cardiovascular diseases, several cancers and both all-cause mortality and mortality from cancer and heart diseases.\textsuperscript{7-24} This is particularly harmful given heightened risks of mortality from COVID-19 linked with NCDs.

The following are our line-by-line responses to JMEA’s points.

1. Mexico adopted the PAHO nutrient profile model (NPM), and Chile, Israel and Uruguay have also implemented similar FOPL policies without every product on grocery shelves receiving warnings. Further, FOPL have been proven to encourage product reformulation, incentivizing corporations to make levels of sodium, sugar, and unhealthy fats lower than they were prior to FOPL.

2. **Warning labels compared to US Facts Up Front and the UK Traffic Light labels are more effective in encouraging reformulation of ultra-processed products and lead to decreased purchasing of ultra-processed products high in nutrients of concern.** There is no research to show a significant impact of these two labels on food purchases or reformulation. In contrast, research from Chile, which uses mandatory octagonal warning labels, has shown how purchasing of sugar-sweetened beverages has declined following implementation of FOPL. Here are some key points found in our studies in Chile:
   a. Chile’s FOP warning label policy has been associated with a roughly 24% drop in sugary drink purchases in the year following initial implementation.\textsuperscript{25} Chile was the highest per capita consumer in the world of these beverages before the warning label was instituted.
   b. An independent evaluation comparing the nutritional profiles of products before and after the first year of Chile’s food policy regulations found that the proportion of products qualifying as “high in” one or more unhealthy nutrients decreased from 51% pre-implementation to 44% post-implementation. This included significant decreases in the content of sugar and sodium. After the law’s implementation, many products’ levels of restricted nutrients shifted below the thresholds specified by the law, showing that the reformulation may have resulted from the government providing thresholds for unhealthy nutrients.\textsuperscript{26}
   c. Econometric analyses have shown that the implementation of the policies did not impact labor market outcomes such as employment and wages of sectors likely affected by the regulation.\textsuperscript{27}
3. In order to address potential issues with importers needing to make new, unique labels for Jamaica—Caribbean nations can easily add stickers to the products, as Chile did for its first six months of implementation. Importers to Jamaica and local manufacturers can be allowed an initial interim period of using stickers and later shifting to printed labels. Processes in Jamaica currently allow for correction of labelling of imported products at the ports of entry to meet national labelling standards. Other food regulations have been implemented for imported products in the past and this should be no different. Given that this will be a CARICOM regional standard, it would apply also to regionally produced products. Since the FOP warning label is an addition to and not in place of current standards elsewhere, there should be no additional costs for export compared to domestic sale. The FOP warning label will encourage both importing manufacturers and domestic manufacturers (for domestic and exportation) to improve their product offerings in Jamaica and beyond. This will also place domestic manufacturers at a comparative advantage and be ahead of their competition as many countries in the European Union, the United Kingdom and in Canada are also applying NPMs to discourage nutrients linked with poor health (sugar, sodium/salt and unhealthy fats).

4. Added sugar functions very differently in our body when combined with all the other components of highly processed or ultra-processed foods and beverages. The same is true for sodium and other fats. As shown by a large body of research, ultra-processed food uses these components along with many additives and flavors and smells added to food to enhance their palatability. This can result in overconsumption of foods high in nutrients of concern.¹

We continue to urge that existing evidence be used to determine the implementation of an effective FOPL system in the Caribbean.

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