

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 2nd, 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.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.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.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.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.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.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.

Barry M. Popkin, PhD
 W. R. Kenan, Jr. Distinguished Professor of Nutrition
 University of North Carolina at Chapel Hill
popkin@unc.edu

Frank Chaloupka
 Research Professor of Economics
 Director, Health Policy Center
 University of Illinois at Chicago
fjc@uic.edu

Carlos A. Monteiro, MD, PhD
 Professor of Nutrition and Public Health
 Department of Nutrition, School of Public Health
 University of São Paulo
carlosam@usp.br

Juan Rivera Dommarco, PhD
 Director
 Centro de Investigacion en Nutricion y Salud
 Instituto Nacional de Salud Pública Mexico
jrivera@insp.mx

Karen Hofman, MB BCH, FAAP
 Director, Priority Cost Effective Lessons for Systems
 Strengthening
 Professor, School of Public Health
 University of the Witwatersrand
Karen.Hofman@wits.ac.za

Dr. Carlos A. Aguilar Salinas
 Investigador en Ciencias Médicas F
 Instituto Nacional de Ciencias Medicas y Nutrición
 Coordinador del Comité de Investigación
 Coordinador del Programa de Maestría y

Walter Willett, MD, DrPH
 Professor of Nutrition and Epidemiology
 Harvard T.H. Chan School of Public Health
wwillett@hsph.harvard.edu

Dr. Tim Lobstein
 Director of Policy
 World Obesity Federation London
tlobstein@worldobesity.org

Professor Corinna Hawkes, PhD
 Centre for Food Policy
 City University of London
Corinna.Hawkes@city.ac.uk

Professor Tim Lang, PhD
 FFPH Centre for Food Policy
 City University of London
t.lang@city.ac.uk

Frank Hu, MD, PhD
 Professor of Nutrition and Epidemiology
 Harvard T.H. Chan School of Public Health
frank.hu@channing.harvard.edu

Carlos A. Camargo, MD DrPH
 Professor of Emergency Medicine & Medicine
 Harvard Medical School, Prof. of Epidemiology
 Harvard T.H. Chan School of Public Health
 Conn Chair in Emergency Medicine
 Massachusetts General Hospital
ccamargo@partners.org

Lawrence J. Appel, MD, MPH

Doctorado en Ciencias Médicas de la UNAM en el INNSZ
caguilarosalinas@yahoo.com

John D Potter MD PhD
Member and Senior Advisor
Division of Public Health Sciences
Fred Hutchinson Cancer Research Center
Professor Emeritus of Epidemiology
University of Washington
jpotter@fredhutch.org

Michael I Goran, PhD
Professor of Pediatrics
Director, Program for Diabetes and Obesity Children's
Hospital Los Angeles; Co-Director USC Diabetes and Obesity
Research Institute
USC Keck School of Medicine
goran@usc.edu

David L. Katz, MD, MPH
President, American College of Lifestyle Medicine
Founder, True Health Initiative
Associate Professor of Public Health
Yale University School of Medicine
david.katz@yale.edu

Jennifer L. Harris, PhD, MBA
Director of Marketing Initiatives
Rudd Center for Food Policy & Obesity
Associate Professor
Allied Health Sciences
University of Connecticut
Jennifer.harris@uconn.edu

David Hammond PhD
Professor and CIHR Chair in Applied Public Health
School of Public Health
University of Waterloo, Canada
dhammond@uwaterloo.ca

Jean-Pierre Després
Scientific Director
VITAM - Centre de recherche en santé durable
Professor, Department of Kinesiology
Faculty of Medicine
Université Laval
Jean-Pierre.Despres@criucpq.ulaval.ca

Gastón Ares
Associate Professor in Sensometrics and Consumer science at
Universidad de la República (Uruguay)
gares@fq.edu.uy

Mary L'Abbé
Professor at the Department of Nutritional Sciences, Faculty
of Medicine
University of Toronto
Mary.Labbe@utoronto.ca

Jean-Claude Moubarac
Assistant Professor,
Department of Nutrition
Université de Montréal
jc.moubarac@umontreal.ca

Professor of Medicine, Epidemiology, and International
Health (Human Nutrition)
Director, Welch Center for Prevention, Epidemiology, and
Clinical Research
Johns Hopkins Medical Institutions
lappel@jhmi.edu

Marion Nestle
Professor of Nutrition, Food Studies, and Public Health
New York University
marion.nestle@nyu.edu

Shiriki Kumanyika
Professor Emerita of Epidemiology
University of Pennsylvania Perelman School of Medicine
skumanyi@mail.med.upenn.edu

Mary Story
Professor
Community & Family Medicine and Global Health
Duke Global Health Institute
mary.story@duke.edu

Kelly Brownell, PhD
Dean of the Sanford School of Public Policy
Robert L. Flowers Professor of Public Policy
Professor of Psychology and Neuroscience
Professor in the Sanford School of Public Policy
Duke University
kelly.brownell@duke.edu

Simon Capewell MD DSc
Vice President
UK Faculty of Public Health
Professor of Clinical Epidemiology
University of Liverpool, UK
capewell@liverpool.ac.uk

Boyd Swinburn MD
Professor of Population Nutrition and Global Health,
University of Auckland
New Zealand; Alfred Deakin Professor, Global Obesity Centre
(GLOBE) Deakin University, Australia; Co-Chair World
Obesity, Policy and Prevention Section
boyd.swinburn@auckland.ac.nz

Oliver Mytton
UKCRC Centre for Diet and Activity Research (CEDAR)
Department of MRC Epidemiology
University of Cambridge School of Clinical Medicine
Box 285 Institute of Metabolic Science
Cambridge Biomedical Campus
Cambridge, CB2 0QQ
Telephone 01223 769152
otm21@medschl.cam.ac.uk

Yoni Freedhoff
Associate Professor
Dept. of Family Medicine University of Ottawa
drfreedhoff@bmimedical.ca

Luis Fernando Gómez Gutiérrez
Professor of public health at the School of Medicine of the
Universidad Javeriana in Bogotá
l.gomezg@javeriana.edu.co

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