

Indian and Global Perspectives of HFSS (High Fat, Sugar and Salt) Foods and UPF (Ultra Processed Foods)

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EXECUTIVE SUMMARY

This report presents the Indian and global perspectives on High Fat, Sugar and Salt (HFSS) foods and Ultra-Processed Foods (UPFs). It provides a brief overview of the development and expansion of the food processing sector and its role in India's GDP. The report also examines the various segments of food processing, their market shares, and their contribution to India's economy.

A brief history of HFSS foods and UPF is outlined, highlighting the efforts of various ministries in defining these terms. The report also details the definitions of HFSS and UPF as established by ICMR-NIN (2024) and discusses the challenges linked to the guidelines. Additionally, global definitions of HFSS, UPF, and NOVA food classifications are discussed.

Several consumer-focused initiatives are highlighted, such as FSSAI's Eat Right India Movement, which promotes healthier eating habits, and the Jago Grahak Jago programme, which informs consumers about food labels and their rights. Additional efforts discussed include school-based programmes like sugar and oil boards, which assist children with nutrition. By combining regulation, education, and public engagement, the report offers a comprehensive approach to encouraging informed food choices, healthy and balanced eating habits and an active lifestyle.

LIST OF ABBREVIATIONS

CAGR	Compound annual growth rate
CBSE	Central Board of Secondary Education
DGI	Dietary Guidelines for Indians
FAO	Food and Agriculture Organization
FBOs	Food Business operators
FOPL	Front of Pack Labeling
FP	Food Processing
FSA	Food Standards Agency
FSS	Food Safety and Standards
FSSAI	Food Safety and Standards authority of India
GDP	Gross Domestic Product
GOI	Government of India
GST	Goods and Service Tax
GVA	Gross Value Added
HFSS	High Fat, Sugar and Salt
ICMR	Indian Council of Medical Research
Kcal	Kilocalorie
MoFPI	Ministry of Food Processing Industries
MoHFW	Ministry of Health and Family Welfare
MoWCD	Ministry of Women and Child Development
NCPCR	National Commission for Protection of Child Rights
NIN	National Institute of Nutrition
NPM	Nutrient Profiling Model
RDA	Recommended Dietary Allowance
R&D	Research and Development
SSBs	Sugar Sweetened Beverages
UPF	Ultra Processed Foods
USD	United States Dollar

INTRODUCTION

Food processing has been an integral part of human life since ancient times, beginning with basic techniques like cooking meat over fire, grinding grains into flour, and squeezing fruits for juice. Even today, we continue to use various forms of processing in our kitchens to prepare everyday meals. Over time, food processing has evolved into a highly advanced industry that uses physical, chemical, and biological methods to transform raw ingredients into safe, palatable, and shelf-stable food products.

Any food that has been altered from its natural state is considered "processed"[1]. This transformation is not just about convenience; it plays a vital role in ensuring food and nutritional security. While food security focuses on making sufficient food available, nutrition security ensures that the food we consume meets our dietary and nutrient needs. Processed foods, when developed responsibly, can support both by extending shelf-life, preserving nutritional quality, and increasing accessibility.

A well-developed food processing sector also helps reduce post-harvest wastage, promotes value addition, encourages crop diversification, ensures better returns to farmers, generates employment opportunities, and enhances export potential. As such, food processing is not only crucial for public health but also for agricultural sustainability and national development.

Food products can be classified according to their level of processing:

Primary	Secondary	Tertiary
Involves the basic preparation of raw agricultural products to make them edible or suitable for further processing. Examples: Cleaning, Sorting, Grading, Milling of Grains, etc	Carried out through cooking or other forms of transformation. Commonly takes place in home or commercial kitchens. Often used in the preparation of traditional foods Alters the basic form of raw materials to make them more suitable for consumption or further preparation. Examples: Making bread from flour, Fermenting milk into yogurt	Refers to industrial-level production of food products. Focuses on ready-to-eat (RTE), ready-to-heat (RTH), or shelf-stable foods. Involves multiple stages of processing. Includes the use of additives, preservatives, flavourings, and advanced packaging technologies. Examples: Instant noodles, Frozen pizzas, Packaged snacks, Breakfast cereals, etc.

Source: National Institute of Nutrition. Dietary Guidelines for Indians-2024. Indian Council of Medical Research, 2024,

The term “food processing” is sometimes associated with negative connotations. It is assumed that processed food is inherently unhealthy from its unprocessed counterpart. However, this perception overlooks an important truth that we process food every day when preparing meals, like washing, chopping, boiling, or cooking. These are all forms of food processing.

Processing is essential for food safety, shelf life, and nutrition. For instance, canned fruits undergo simple processes like peeling and airtight sealing. This not only makes them safe and convenient to consume but also helps retain sensitive micronutrients that might otherwise degrade quickly.

Food processing also plays a crucial role in ensuring food security and saving lives, especially in areas where access to fresh produce or refrigeration is limited. Many foods are minimally processed to enable them to be consumed. Thus, it is simplistic to label that food processing is detrimental to human health.

Processed Food Product Examples and Their Benefits:

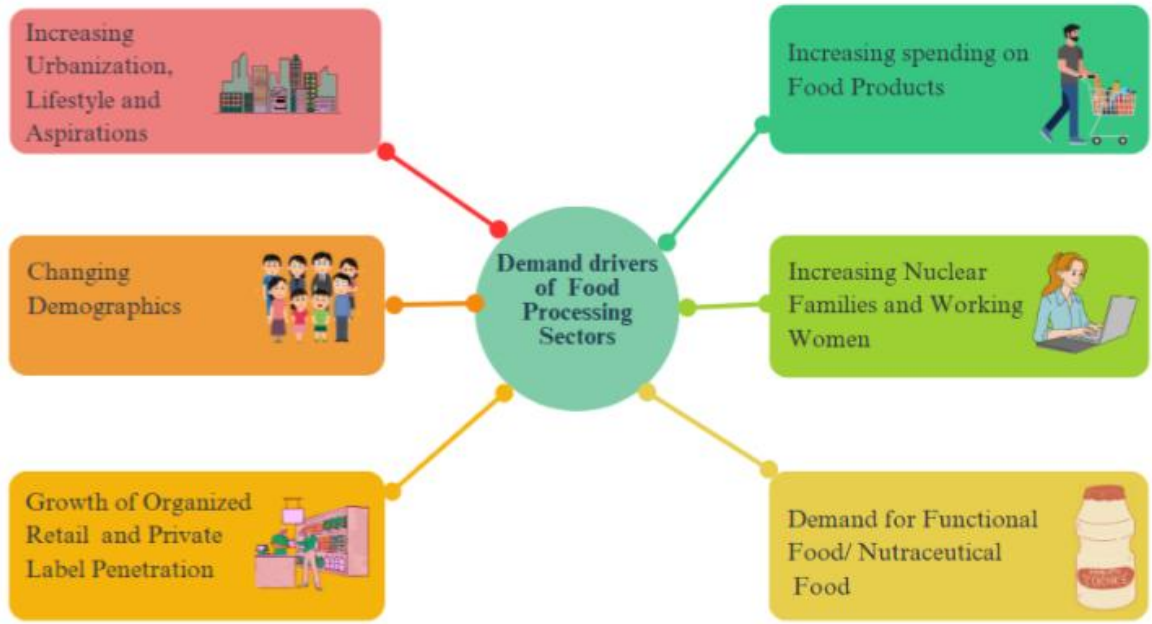
S. No.	Food Products	Benefits
1.	Pasteurized Milk	Improves safety and shelf life while preserving essential nutrients.
2.	Frozen Vegetables like Peas	Help reduce seasonal dependency and maintains quality throughout the year.
3.	Whole grain packaged breads	Rich in fiber and nutrients from whole Grains.
4.	Canned Beans	Convenient and Nutritious source of protein and fiber.

Source: National Institute of Nutrition. Dietary Guidelines for Indians-2024. Indian Council of Medical Research, 2024,

Need for Food Processing

Over the past decade, the world has witnessed a significant surge in the production and consumption of processed foods. The worldwide processed food market is expected to reach USD 3407.2 billion by 2030, growing at a compound annual growth rate (CAGR) of 5.2% from its 2020 valuation of USD 1925.7 billion[2]. This shift is largely driven by factors such as urbanization, rising incomes, and the rapid expansion of modern food retail. One of the major drivers behind the sector's rapid growth is urbanization. As urban populations grow, dietary habits are shifting significantly. There is increasing demand for convenient, ready-to-eat, and packaged foods that save time and require minimal preparation.

The various demand drivers of food processing sectors are:



Source: Annual Report 2023-24, Ministry of Food Processing Industries, Government of India

Indian Food Processing Sector: Growth Potential

- The food processing industry is a key part of the Indian economy, contributing to GDP, employment, and exports.
- Between 2014 and 2023, the industry grew at an average annual rate of 5.35%, showing strong and steady development.
- The sector constituted as much as 7.66 per cent and 8.45 per cent of GVA in Manufacturing and Agriculture sector respectively in 2022-23 (at 2011-12 prices).
- In 2023–2024, India's agri-food exports, including processed food, were valued at US $46.43 billion, which is 11.70% of the country's total exports (US $395.39 billion).

Over the years, agricultural production in India has consistently increased, leading to higher output.

According to World Agriculture data (2020), India ranks:

- 1st in pulses and milk production,
- 2nd in vegetables primary, fruits primary, wheat, rice, and eggs primary,
- 3rd in cereal production globally[3].

Sectoral overview of various food categories



Source: Ministry of Food Processing Industries (MoFPI), Government of India

BACKGROUND OF HFSS AND UPF

Food processing began over a long time back with roasting meat over fire and evolved to include methods like cooking, pickling, fermenting, freezing, and drying. These techniques help transform raw materials into safe, palatable, nutritious, and preservable foods.

In recent decades, India has experienced more consumption towards refined and processed foods. This change is driven by the rapid growth of the food processing industry, bolstered by government policies, economic liberalisation, and private investment. Processed foods are now more widely available across the country, thanks to the expansion of domestic businesses and the introduction of international brands.

Together with changing lifestyles, urbanization, and greater market exposure, this growth has contributed to a shift in dietary patterns, with a growing preference to convenient processed options alongside traditional Home-cooked meals, marking a significant change in India's food consumption patterns.

Brief background of how the terms "Junk food", "HFSS" and "UPF" came into existence[4]

December 2010: Uday Foundation filed Public Interest Litigation in the Delhi High Court to ban junk food and carbonated drinks in schools and their sale within a radius of 500 yards and to develop a comprehensive school canteen policy, which emphasizes healthy nutrition among school-going children.

February 2011: The court gave an order to the Union of India (UOI) to submit a counter-affidavit mentioning any policy made about junk food and its effects, based on global knowledge or international standards.

July 2011: FSSAI informed the court that "Junk Food" is not officially defined in the law and FSSAI is in the process of drafting the rules.

March 2014: FSSAI, with the approval of Central Advisory Committee finalized the guidelines and submitted to court.

Key Points from the FSSAI Guidelines for Making available Wholesome, Nutritious, Safe and Hygienic Food to School Children in India dated 12th October 2015:

1. *Restrict/Limit the Availability of the most common HFSS Foods in Schools and area within 50 meters.*
2. *Regulate Marketing and Promotion of HFSS Foods to Children*
   - *Control advertisements of HFSS foods aimed at school-aged children.*
   - *Include restrictions based on age group, media type (print/electronic), and timing of broadcasts.*
   - *Limit advertisements on platforms where children are the primary audience.*
   - *Ban celebrity endorsements for HFSS foods in content targeting children.*
   - *Restrict promotional campaigns (free gifts, games, cartoon characters) that appeal specifically*

HISTORICAL EFFORTS TO DEFINE HFSS AND UPF IN INDIA

Historically, various efforts have been made to define the HFSS and UPF terms. These efforts have aided the regulator in tackling the challenges associated with defining this terminology. Various expert and working groups, along with government bodies like FSSAI and ministries have collaborated to develop definitions that help identify and classify different food categories based on their nutritional content and level of processing.

HFSS Foods in India: Evolution of Definitions

In 2015, a ***working group constituted by the Ministry of Women and Child Development*** prepared a report entitled "*Addressing Consumption of Foods High in Fat, Salt and Sugar (HFSS) and Promotion of Healthy Snacks in Schools of India".* In this report, the group proposed the following definition of HFSS foods:

"HFSS foods may be defined as foods (any food or drink, packaged or non-packaged) which contain low amounts of proteins, vitamins, phytochemicals, minerals and dietary fiber but are rich in fat (saturated fatty acids), salt and sugar and high in energy (calories) that are known to have negative impact on health if consumed regularly or in high amounts".

In 2017, to strengthen the process of defining the term HFSS, ***FSSAI constituted an Expert Group*** that included eminent experts from the fields of medicine, nutrition, and dietetics, representing well-known medical research and academic institutions. The Expert Group prepared a detailed report on the consumption of Fat, Sugar and Salt and its Health effects on the Indian Population.

Definitions as per the Expert Groups report:

High Fat: According to expert groups like FAO/WHO (2008) and ICMR (2010), foods are considered high in fat if more than 35% of the total energy comes from fat.

High Sugar: High sugar is defined as high sugar intake. The intake of sugars above 10% (>50 grams of sugar) of total energy intake per day.

High Salt: The intake of salt above 6g/day (>2g/day sodium) is considered as high salt by WHO

In 2022, ***the Food Safety and Standards Authority of India (FSSAI) introduced 'HFSS' Definition under the Draft Food Safety and Standards (Labelling and Display) Amendment Regulations, 2022:***

As per the Draft Regulation, High fat, sugar, salt (HFSS) food means a processed food product which has high levels of saturated fat or total sugar or sodium. The declared values of these ingredients are such that the product does not satisfy the value of energy (kcal) from total sugar less than 10 percent of total energy, or from saturated fat 10 percent of total energy, and sodium less than 1 mg/1 kcal.

Historical attempt to define UPF in India

In 2017, ***The Expert Group constituted by FSSAI prepared a detailed report on the consumption of Fat, Sugar and Salt and its Health effects on Indian Population.***

Ultra-Processed Food Products: Ultra-processed are food products that are ready- to- eat and ready-to-heat and eat foods derived through various techniques such as baking, frying, extruding, moulding, hydrogenation and so on. These foods are created by special processes to make food attractive, hyperpalatable, cheap, and ready to eat. They also contain various combinations of preservatives, stabilizers, emulsifiers, solvents, binders, bulkers, sweeteners, flavour enhancers; processing aids; colours and flavours.

CURRENT INDIAN SCENARIO

ICMR- National Institute of Nutrition, Dietary Guidelines for Indians (2024)

The Dietary Guidelines for Indians, 2024 define HFSS foods as "Those prepared with excessive cooking oils/fats or added sugar and salt". HFSS foods are classified as any food or diet containing:

High Fat:

HFSS foods are defined as a food or diet that contains more than 15 per cent of energy from any cooking vegetable oils or ghee, butter (visible or added oil/fat), etc. In other words, diets that contribute more than 30g of visible or added oils/fats per day for a 2000 Kcal diet.

High Salt:

The intake of salt above 5g/day (sodium >2g/day) is considered 'high'.

High Sugar:

Consumption of added sugar in quantities that contribute over 5% of total energy intake per day or 25 g/day (based on average intake of 2000 Kcal/day) is defined as 'high' sugar.

Definition of UPF

ICMR in dietary guidelines for Indian 2024, specified that UPFs refer to food and beverage products that have undergone extensive industrial processing and contain a high number of additives such as preservatives, sweeteners, colourings, flavours, emulsifiers, and other Substances that are not commonly used in culinary preparation.

ICMR-NIN food categorization based on extent of processing, and nutrients (fat, sugar, salt) of concern

As per ICMR-NIN Dietary Guidelines for Indians 2024, foods are categorized based on the extent of processing and concerns related to nutrients such as fat, sugar, and salt. Category A represents minimally processed foods, Category B includes moderately processed foods, and Category C refers to ultra-processed foods (UPFs), which typically involve excessive processing and the addition of multiple additives.

Category	Processing	Nutritional Profile	Examples
A Category A	-Minimal processing -Edible part mostly unchanged -No preservatives, artificial flavors, or colours	High in natural nutrients Rich in fibre, vitamins and minerals	Fruits, vegetables, whole grains Fresh milk, homemade paneer, nuts, legumes
B Category B	-Drying, freezing, fermenting, baking, canning -Minimal nutrient loss -No artificial additives -Possible Fiber depletion	Nutrients mostly retained Fibre slightly reduced	Polished grains (e.g. white rice, dal, maida), frozen curries, pickled vegetables, commercial paneer.
C Category C	-Extensively processed -Use of additives: preservatives, colours, flavours, bleaches -Major nutrient and fiber loss	Low in nutrients and fibre May lead to negative health effects	Commercial breads & breakfast cereals, cakes, chips, biscuits, jams. sauces, soft drinks, refined flour, paneer with additives.

Challenges and Limitations in defining and classifying HFSS and UPF in DGI 2024

Challenge 1: Definition of HFSS

The HFSS definition focuses on the percentage of energy from fat, sugar, and salt. This allows food with high calories (like from fat) to include more of sugar, salt and fat and still meet the limit, which defeats the goal of promoting healthier foods. The limits (e.g., sugar <10% of energy, fat <15%, sodium <2g/day) are meant for daily intake, not individual foods. Applying them to every food category without context may wrongly label most packaged foods as unhealthy. This could discourage food innovation. Also, dietary health depends on overall eating habits, portion sizes, frequency, and lifestyle not just individual food nutrients. Even homemade food can be unhealthy if high in fat, sugar, or salt. So, food classification should consider the whole diet, not just nutrient numbers.

Challenge 2: Recommended amount of 'Sugar'

According to FSS (Labelling and Display) Regulations 2020, 50g of added sugar per day is used as a reference to calculate the percentage of Recommended Dietary Allowance (RDA) shown on food labels.

However, as a part of DGI, consumption of sugar in quantities that contribute 25g/day is defined as 'high' sugar.

Challenge 3: Limitations in the Definition of UPFs (Ultra Processed Foods)

The DGI 2024 defines Ultra-Processed Foods (UPFs) primarily on the extent and type of industrial processing involved. From the perspective of food science and technology, the degree of processing and the nutritional value of a product do not have a linear relationship, and these concepts need to be dissociated. In many cases, processing improves food safety, shelf life, and even nutritional content, such as through fortification with essential

micronutrients, reduction of anti-nutritional factors, or reformulation to reduce sugar, salt, or unhealthy fats.

The definition of UPFs focuses on the processing techniques and the presence of additives such as preservatives, colorings, flavor enhancers, and emulsifiers rather than the nutritional profile of the food itself. This approach can lead to generalizations, as it assumes all highly processed foods are nutritionally poor or harmful, which is not always the case.

Challenge 4: ICMR-NIN food categorization based on extent of processing, and nutrients (fat, sugar, salt of) concern

- Food additives are used under strict regulations and undergo thorough safety evaluations before being approved for use. These substances are permitted only within safe limits to enhance food safety, quality, shelf life, and appearance. Regulations clearly define where and how additives can be used, including required labelling. If scientific evidence suggests a risk, the rules are updated accordingly. Therefore, it is important to reconsider the current classification method to ensure it fairly represents the safety and essential role of additives, avoiding negative perceptions.
- This classification has a major impact, as it would place most products except a few like milk, plain yoghurt, and coffee powders into the Group C/UPF category. However, there's no proven direct link between the level of food processing and its nutritional value. In fact, some highly processed foods, like plant-based protein products, can have high nutritional value, while some minimally processed foods may not.
- The categorization uses the scale of manufacture (homemade vs. commercial) and the addition of ingredients as key factors. For example, homemade paneers are seen as minimally processed, while commercial paneers are moderately processed, and paneer with added flavor is labelled ultra-processed. However, manufacturing scale and ingredient addition should not be the basis for processing-based food classification.

Challenge 5: The proposed classification of HFSS and UPF foods may result in several traditional Indian foods such as murukku, Mysuru Pak, papad, and other home-prepared or extruded snacks being labeled as "unhealthy."

This could unintentionally undermine the cultural significance and heritage of Indian cuisine. Therefore, any such proposal should carefully evaluate the broader socioeconomic implications, respect for traditional diets, and the country's nutritional realities. It is important to acknowledge that the degree of food processing does not always directly correlate with its nutritional value.

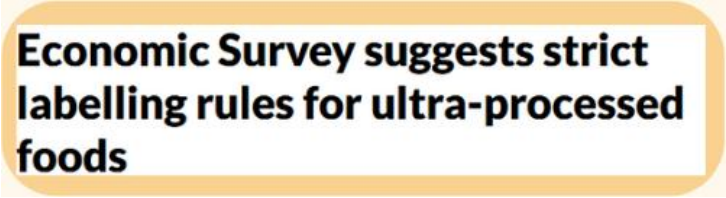
RECENT DEVELOPMENTS IN INDIA AND GLOBAL

The Economic Survey (2024-25) annual report released by Ministry of Finance, GOI

- Studies from across countries show a direct association between exposure to UPFs and 32 health parameters.
- Setting standards for permissible levels of salt and sugar and ensuring checks for UPF brands to adhere to the regulations are also required.
- Understanding the ingredients of packaged foods, the ill effects of UPF and healthy food choices should be a part of the school curriculum.
- The MoHFW should urgently define nutrient thresholds for sugar, salt and saturated fats to regulate advertising, adopt warning front-of-pack labels (FOPL).
- Impose stricter marketing restrictions on unhealthy foods targeting children under 18.
- Schools, hospitals, and public areas should eliminate UPFs.
- A higher tax rate for UPFs may also be considered as a 'health tax' measure targeted specifically at brands/products that advertise.
- Mention of NOVA Food Classification System and DGIs 2024, which identifies UPFs.



source: Mint, [31 Jan 2025]

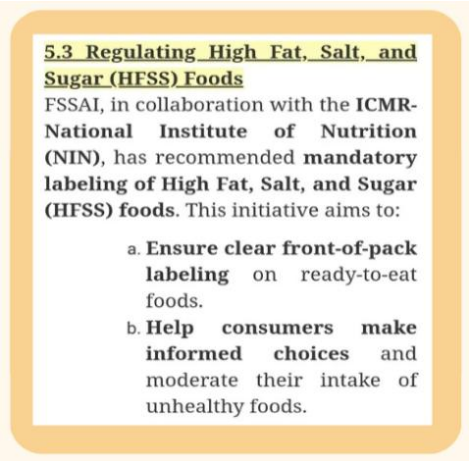


source: Hindustan times, [31 Jan 2025]



source: The economic Times, [1 Feb 2025]

In a Press release dated **1st March 2025, Ministry of Information & Broadcasting** said "FSSAI in collaboration with ICMR-NIN has recommended mandatory labelling of HFSS foods which aims to ensure clear front-of-pack labeling and help consumers make informed choices to moderate the intake of unhealthy foods."



5.3 Regulating High Fat, Salt, and Sugar (HFSS) Foods

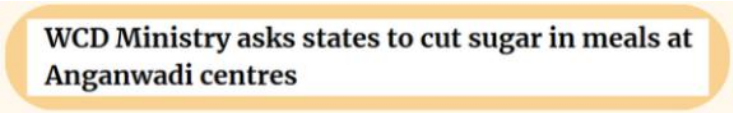
FSSAI, in collaboration with the **ICMR-National Institute of Nutrition (NIN)**, has recommended **mandatory labeling of High Fat, Salt, and Sugar (HFSS) foods**. This initiative aims to:

a. **Ensure clear front-of-pack labeling** on ready-to-eat foods.
b. **Help consumers make informed choices** and moderate their intake of unhealthy foods.

Source: Press information bureau (PIB)

MoWCD Advisory on use of added sugar, salt, preservatives, colours, flavours, etc., in supplementary nutrition

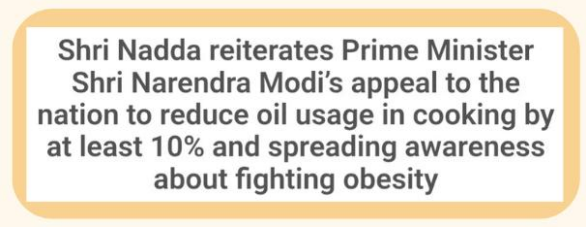
As per the advisory issued by the Ministry of Women and Child Development on 17 April 2025, States have been directed to avoid the use of HFSS (High Fat, Sugar, and Salt) foods and cut down sugar content in meals served at Anganwadi centres. The advisory emphasizes restricting added sugar (preferably jaggery) to less than 5% of total energy intake, minimising salt use, and ensuring that foods for young children are free from preservatives, added colours, and synthetic ingredients.



WCD Ministry asks states to cut sugar in meals at Anganwadi centres

source: Business Standards, [21 Apr 2025]

On April 19, 2025, during a liver health camp held in observance of World Liver Day, Union Health Minister Shri J.P Nadda reiterated the Prime Minister's earlier appeal to reduce edible oil usage in cooking by at least 10%. The event, organized by the Ministry of Health and Family Welfare in collaboration with FSSAI and Institute of Liver and Biliary Sciences, included awareness activities promoting informed food choices.



Shri Nadda reiterates Prime Minister Shri Narendra Modi's appeal to the nation to reduce oil usage in cooking by at least 10% and spreading awareness about fighting obesity

Source: Press information bureau (PIB)

In May 2025, the Central Board of Secondary Education (CBSE) issued a directive (Circular No: Acad-26/2025, dated 14 May 2025) to all affiliated schools to establish 'Sugar Boards' as part of a broader initiative led by the National Commission for Protection of Child Rights (NCPCR). This effort aims to raise awareness among students about balanced dietary practices by highlighting the sugar content in commonly consumed foods, recommended daily intake, potential health impacts of excessive sugar consumption, and healthier alternatives. Schools were also encouraged to conduct workshops and seminars to reinforce these messages.



Source: Press information bureau (PIB)

FSSAI National Stakeholder Consultation

FSSAI convened a national stakeholder consultation dated 16th May 2025 wherein it was proposed that the definitions for HFSS and UPF as laid down under the Dietary Guidelines for Indians, 2024 (DGIs 2024) be referred as a regulatory requirement for packaged foods.

On May 28, 2025, the Food Safety and Standards Authority of India (FSSAI) urged States and Union Territories to take action on Prime Minister Shri Narendra Modi's call to reduce edible oil consumption by 10% and raise awareness on obesity prevention. During the 47th Central Advisory Committee (CAC) meeting in New Delhi, discussions included scaling up public campaigns, strengthening food safety surveillance, and promoting the 'Eat Right India' initiative. The meeting also highlighted the recent CBSE directive on establishing 'sugar boards' in schools to help monitor and reduce sugar intake among students.

Food safety authority urges states to boost action against obesity and reduce oil consumption by 10%

source: The Economic times, [28 May 2025]

On World Food Safety Day 7th June 2025, Union Health Minister Shri Jagat Prakash Nadda addressed a special program titled "Stop Obesity by Eating Safe and Healthy" organized by FSSAI under the Ministry of Health and Family Welfare. He emphasized reducing oil consumption by 10% and lowering salt intake through awareness of healthy eating and

commended the introduction of Sugar and Oil Boards in schools, workplaces, and public institutions developed by FSSAI.



Source: Press information bureau (PIB)

WHO's "3 by 35" Initiative, On 2nd July 2025, the World Health Organization (WHO) launched the "3 by 35" Initiative, urging countries to raise the real prices of tobacco, alcohol, and sugary drinks by at least 50% by 2035 through health taxes. The goal is to reduce the burden of noncommunicable diseases (NCDs) and generate US$1 trillion in public revenue over the next 10 years.

The initiative focuses on three key areas:

• Cutting harmful consumption by reducing affordability

• Raising revenue to fund health and development

• Building Broad political support across ministries, Civil society and academia.



Source: WHO (World Health Organization)

GLOBAL SCENARIOS/GLOBAL DEFINITIONS OF HFSS AND UPF

This section presents a structured analysis of how leading nations and international bodies formally define and regulate HFSS and UPF.

Global definition of HFSS

In the United Kingdom, HFSS (High in Fat, Sugar, and Salt) food and drink products are defined using the Nutrient Profiling Model (NPM), developed by the Food Standards Agency (FSA) in 2004-2005.

The model calculates a score based on the nutritional content per 100g, taking into account energy, saturated fat, sugars, sodium, fiber, protein, and fruit, vegetable, or nut content. Products are classified as HFSS if they meet or exceed the threshold of 4 points for foods or 1 point for drinks[5].

Under current regulations in England, promotions of HFSS products, including volume discounts (such as "buy one, get one free") and prominent placement in retail settings, are restricted both in-store and online.

Mexico: Mexico uses a warning label system for HFSS foods exceeding thresholds for calories, sugar, sodium, and saturated fats and has imposed taxes on sugar-sweetened beverages and energy-dense foods since 2014[6].

Chile HFSS regulations

Chile implemented in June 2016 the Law No. 20.606 on Nutritional Composition of Food and its advertising (hereinafter "Law on Food Labelling") (Hawkes *et al*., 2015; Roberto *et al*., 2015; Swinburn *et al*., 2011). This law requires the use of "ALTO EN" ("high in") warning labels (similar to a stop disc) on foods that are high in sugar, sodium, saturated fat or energy, which makes it easier to identify these products.

NUTRIENT THRESHOLDS

Solid Food	**26 June 2016**	**26 June 2018**	**26 June 2019**
Energy (Kcal/100g)	350	300	275
Sodium (mg/100g)	800	500	400
Total Sugars (g/100g)	22.5	15	10
Saturated Fats (g/100g)	6	5	4

Liquids	**26 June 2016**	**26 June 2018**	**26 June 2019**
Energy (Kcal/100g)	100	80	70
Sodium (mg/100g)	100	100	100

Total Sugars (g/100g)	6	5	5
Saturated Fats (g/100g)	3	3	3

The implementation of Chile's front-of-pack warning labels led to significant changes in the food industry, particularly in the regulation of HFSS products. A study found that 15% of packaged foods were reformulated to reduce harmful ingredients, especially sugar and sodium, with notable improvements in beverages, breakfast cereals, dairy products, and cold meats. In 13 out of 16 food categories, these healthier reformulated products accounted for over one-third of total sales, indicating that companies targeted popular products to avoid the "high in" warning labels. Additionally, a content analysis of 5,609 food and beverage advertisements revealed that nearly 19% of ads promoted products by highlighting the absence of warning labels. These ads often emphasized health benefits and weight control and were more likely to target children through the use of animated characters and child-focused themes showing how HFSS foods continued to be marketed, now as "healthier" options. Despite concerns about economic disruption, a comprehensive economic analysis showed no significant negative effects on employment, production, or investment in the food industry[7].

Global Definitions of UPF

The Food and Agriculture Organization (FAO) has referred to the NOVA classification system to define ultra-processed foods (UPFs). NOVA classification was developed by Centre of epidemiological studies in Health and Nutrition, School of Public Health, University of Sao Paulo, Brazil and is accepted globally (Monteiro et al, 2019)

The NOVA classification system groups all foods according to the nature, extent and purpose of the industrial processes they undergo and classifies all foods and food products into Four groups:

GROUP	CATEGORY	DESCRIPTION	EXAMPLES
1.	Unprocessed and Minimally Processed Foods	Foods in their natural state or altered by minimal processes such as drying, boiling, pasteurizing, freezing etc., without added substances.	Fresh fruits, vegetables, milk, grains, legumes, nuts, meat, eggs, frozen vegetables, fish, seeds, dried fruits.
2.	Processed Culinary Ingredients	Substances obtained directly from Group 1 or from nature (e.g. oils, sugar, salt) made via processes like refining, pressing, extracting or mining.	Vegetable oils, butter, sugar, honey, salt, vinegar
3.	Processed Foods	Foods made by adding salt, sugar or oils (group 2) to group 1 foods, often using methods like canning, bottling, or fermentation.	Canned vegetables, fruit in syrup, cheese, salted nuts, fresh bread, canned fish, fermented pickles
4.	Ultra-Processed Foods	Formulations of substances derived from foods and additives, using multiple industrial processes like extrusion, molding or chemical modification.	Carbonated soft drinks, chips, candies, instant noodles, chicken nuggets, hot dogs, sweetened cereals, energy drinks.

Source: Ultra-processed foods, diet quality, and health using the NOVA classification system. FAO

Definition of UPF in Dietary Guidelines for the Brazilian Population, 2015

Ultra-Processed foods are industrial formulations made entirely or mostly from substances extracted from foods (oils, fats, sugar, starch, and proteins), derived from food constituents (hydrogenated fats and modified starch), or synthesized in laboratories from food substances or other organic sources (flavour enhancer, colours, and several food additives used to make the product hyper-palatable). Manufacturing techniques include extrusion, moulding, and preprocessing by means of frying.

Definition of UPF in Canada's Dietary Guidelines, 2019

Ultra-processed is a category of foods in the NOVA food classification system that refers to products as industrial ingredients, obtained from the extraction, refinement, and transformation of constituents of raw foods, with usually little or no whole food.

Definition of UPF in Malaysian Dietary Guidelines, 2020

Ultra-processed foods are characterized by NOVA as industrial formulations generated through compounds extracted, derived or synthesized from food or food substrates. Ultra-processed foods also commonly contain artificial substances such as colours, sweeteners, flavours, preservatives, thickeners, emulsifiers and other additives used to promote aesthetics, enhance palatability and increase shelf life. Ready to eat food and beverage, spreads, packaged snacks and pastries, cakes, instant noodles, pre-prepared ready to heat products are some examples of ultra-processed foods high in sugar, salt, fat and artificial substances.

UNDERSTANDING THE IMPACT ON TAXATION AND ADVERTISMENT

While the government and various ministries have made several attempts to define these terms, it is necessary to understand the impact of doing so. Although the major objective of defining these terms is to safeguard public health, its potential impact on Advertisement and fiscal policies cannot be overlooked.

Impact on Taxation

India's Goods and Services Tax (GST) system has various slabs of tax rates such as 0%, 5%, 12%, 18%, and 28%. In 2017, the government imposed the highest GST rate of 28%, plus an additional 12% cess on sugar-sweetened beverages (SSBs) to curb their consumption[8]. The introduction of additional taxes on specific food categories, especially the non-defined HFSS and UPF foods, may complicate the tax landscape.

The arbitrary taxes imposed by some states may lead to a lack of uniformity in tax policies, resulting in increased compliance costs and additional challenges for businesses. Given the current taxation landscape in India, it may not be necessary to introduce strict taxation measures for HFSS and UPF foods. Instead, a more measured approach could be adopted, focusing on education and awareness initiatives to promote healthier eating habits. This could include public health campaigns, food labelling reforms, and industry partnerships to develop healthier food options.

Impact on Advertisements

In the wake of the economic survey, there have been increasing calls for stringent advertising restrictions on HFSS and UPF foods. Restrictions on these products, particularly to the vulnerable populations such as children, during peak hours when children are likely to watch television or using digital media, may impact the sale, marketing, revenue and eventually the business.

CURRENT INITIATIVES

Food plays an important role in our lives, and it is essential to understand that no single food is inherently bad. Every food has its place in the diet, and the key lies in moderation, variety, and balance, for example, protein-enriched packaged snacks (e.g. roasted chickpeas, nut bar with no added sugar) provide satiety, high-quality protein, and healthy fats. Similarly plant-based milk alternatives (e.g. fortified soy or oat milk) are suitable for lactose-intolerant individuals; fortified with calcium, vitamin D, and vitamin B12.

The goal of defining these terms is not to avoid certain food categories but to help consumers understand them better, what they contain, how they are made, and how they can fit into a balanced diet. With this approach, awareness becomes a tool for empowerment rather than restriction.

Further to support this, FSSAI introduced Food Safety and Standards (Safe Food and Balanced Diets for Children in School) regulation, 2020 with the objective of creating a supportive food environment in schools that encourages informed and balanced eating among children. Under this regulation, the sales or free distribution of food products high in saturated fat, added sugar or sodium is not permitted within school premises or in the surrounding 50 meter area. Schools are also required to display a board at their entrance stating: “Do not sell, market, or advertise food products high in saturated fat, trans fat, added sugar, or sodium within school premises or campus”. Additionally, the use of banners, wallpaper, or digital advertisements promoting such foods is not allowed on school computers or within the school environment. Food business operators (FBOs) are prohibited from offering toys, coupons, discounts, or sponsoring events involving such foods. The use of brand names, logos, or characters of restricted food products on school supplies, educational materials, vending machines, sports equipment, or buildings is also not allowed. Furthermore, fundraisers, giveaways, or reward-based promotions involving these food items are strongly discouraged within the school setting.

Existing Government Initiatives

Eat Right India Movement:

Source: Eat right India logo-FSSAI

To encourage balanced and healthier eating habits, FSSAI has launched a large-scale initiative to strengthen the country's food system through the Eat Right India movement in 2018. The tagline "Sahi Bhojan. Behtar Jeevan" reflects the core message of making informed food choices. As part of this, FSSAI introduced a nation-wide social media campaign "Aaj Se Thoda Kam" which encourages individuals to be mindful of their daily intake of fat, sugar, and salt and consider moderate consumption as part of overall well-being.

Jago Grahak Jago Initiative:

Source: Ministry of Consumer Affairs, India (Jago Grahak Jago)

The Ministry of Consumer Affairs' Jago Grahak Jago program (2005) is a nationwide consumer awareness campaign that educates citizens about their rights and responsibilities. The initiative includes components on food safety awareness, helping consumers understand product labels and make informed choices about their purchases.

'10% less oil' Initiative:

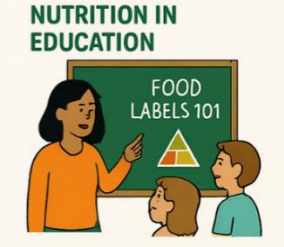


Source: Ministry of Information and Broadcasting, Government of India

In alignment with the Prime Minister's message encouraging healthier dietary practices, FSSAI has supported the reduction of cooking oil consumption by approximately 10%. The objective is to raise awareness about mindful oil usage among individuals, households, and food service providers. This initiative focuses on promoting moderation in oil use as part of routine cooking practices.

Government and Public Strategies to Enhance Awareness

Inclusion of Nutrition in Education or School Curriculum



Incorporating basic nutrition and food label reading into school and college curriculum can help students understand balanced diets, ingredients, and different types of foods and their processing. Simple activities like reading nutrition labels and discussing everyday meals can build awareness from a young age. This encourages mindful eating habits and helps students make informed food choices for themselves and their families.

Community Awareness Drives



Community awareness drives help people make informed food choices through local events like workshops, health camps, street plays, and food stalls. These activities, held in public spaces or schools, use simple language and visuals to explain food labels, portion sizes, and the idea of moderation. Awareness about how advertisements can influence food preferences can also be included. Involving teachers, health workers, and volunteers makes these initiatives more relatable and encourages better food decisions within the community.

Balanced Eating Habits



Consumers can be encouraged to enjoy a wide variety of foods in appropriate portions, including HFSS and UPF items as part of an overall balanced diet. The goal shall not be to eliminate these food products rather the emphasis shall be on quantity and frequency.

Physical Activity



Physical activity is an essential part of a balanced lifestyle and complements healthy eating habits. Regular movement such as walking, cycling, playing sports, or doing yoga helps maintain overall well-being and supports energy balance. Encouraging daily physical activity in schools, workplaces, and at home promotes awareness about staying active and can help individuals make more mindful choices about their food and routine.

Role of families in food awareness



Parents and young individuals play a key role in building awareness about food choices, When families are involved in everyday food-related activities such as grocery shopping, cooking, and reading food labels it helps children develop practical knowledge about ingredients, nutrition, and portion sizes. Encouraging open discussions at home around moderation, variety, and balanced meals creates a supportive environment where food is understood rather than judged.

FICCI, a not-for-profit trade association and advocacy group, has initiated a remarkable step in introducing "FICCI Guidelines for consumers of Processed Foods", which helps consumers in making informed food decisions and aims at providing accurate and relevant information about processed foods that have become a part of our daily needs. The guideline is accessible at https://meet.ficci.in/documents/PROCCESED_FOOD_GUIDELINE.pdf

Way Forward

FSSAI shall adopt a holistic and practical approach while defining HFSS and UPF, considering not just the nutrient composition but also factors like portion size, frequency of consumption, role of food within overall diet, and category-specific variations. The classification should clearly distinguish between the level of processing and nutritional quality. Defining limits based on realistic serving sizes and intended use is essential. At the same time, clear and consistent labelling criteria should guide consumers without creating confusion. This approach will help ensure that the definitions are transparent, scientifically sound, culturally relevant, and supportive of both public health and food innovation.

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