ADJUSTMENTS TO INDONESIA'S 'HEALTHIER CHOICE LOGO' FOOD LABELLING SCHEME COULD PROMOTE HEALTHIER CHOICES

MAY 2022

Rimbawan, Eny Kurnia Sari, Aang Sutrisna

KEY MESSAGES

- Front-of-pack labelling **can be** an important tool to help consumers make healthier food choices. Indonesia recently launched a voluntary front-of-pack labelling system called the **Healthier Choice Logo**.
- Despite being a useful first step, **the system can be strengthened** in two ways.
  - First, some products currently eligible for this logo are not well aligned to the standards of the World Health Organization or to other systems used around the world. **Changing the thresholds on salt, sugar, and fat** content used in the Healthier Choice Logo would improve its effectiveness and exclude products that are not very healthy from being endorsed.
  - Second, **making the Healthier Choice Logo requirements mandatory** rather than voluntary would lead to it appearing on many more food products and potentially reaching more consumers.

INTRODUCTION

Adolescents in Indonesia face multiple nutritional challenges, including undernutrition and anaemia, as well as a growing prevalence of overweight and obesity. The latter is also the country's leading risk factor for chronic disease[1]. Prevalence of overweight and obesity among adolescents aged 13-15 years and 16-18 years grew from 10.8% and 7.3% in 2013 to 16% and 13.5% in 2018, respectively [2,3]. Malnutrition challenges like these arise in part from how easy it is for people to access and consume affordable low-quality foods, including energy-dense, highly palatable pre-packaged snacks high in fat, salt, and sugar[4].

Although most pre-packaged snacks are labelled in some way, there is no requirement for highly visible health-related labels. While several studies have shown that most Indonesians, including adolescents, do not tend to make purchase decisions based on existing food labels[5,6,7], there remains a strong argument for

[1] Sahoo K, Sahoo B, Choudhurry A, Sofi NK, Kumar R, Bhadoria A. 2015. Childhood obesity: causes and consequences. J Family Med Prim Care. 4(2):1870192

[2] Indonesian Ministry of Health. 2013 National Health Survey Report. Indonesian Ministry of Health

[3] Indonesian Ministry of Health. 2018. National Health Survey Report. Indonesian Ministry of Health

[4] Blum LS, Mellisa A, Sari EK, Yusadiredja IN, van Liere M, Shulman S, Izwardy D, Menon R, Tumilowicz A. 2019. In-depth assessment of snacking behaviour in unmarried adolescent girls 16-19 years of age living in urban centres of java, Indonesia. 15(4):e12833. doi: 10.1111/mcn.12833

[5] Purnama, AS. 2012. The relationship between information label on nutritional value reading skill, product taste perception, and the other factors with the information label on nutritional value compliance reading at mandalahayu vocational school bekasi students in 2012. BSc Scription, Universitas Indonesia

[6] Lestari D. 2013. Dominant factor of reading food labels adherence among Ragunan Jakarta Athlete Special High School students in 2013. BSc Scription. Universitas Indonesia

[7] Mauludyani, A. V. R., Nasution, Z., Aries, M., Rimbawan, R., & Egayanti, Y. (2021). Knowledge on Nutrition Labels for Processed Food: Effect on Purchase Decision among Indonesian Consumers. *Jurnal Gizi dan Pangan*, *16*(1), 47-56

improving food labelling and related consumer education and outreach. If labels were better designed, the practice of reading them could both improve nutritional knowledge and influence purchasing decisions. To achieve this, it is critical to design informative food labels that are placed prominently on the front of the packaging, as these are most likely to influence consumer decisions to choose healthier foods[8].

In 2019, the Indonesian government launched an optional Healthier Choice Logo[9] to help consumers identify products that are healthier within specific categories – for example, ready-to-consume drinks or instant pasta and noodles. The regulation was updated in 2021 to include 20 different food categories, including bakery products, ice cream, ready-to-eat snacks, processed peanut products, and ready-to-eat cereals[10]. Table 1 provides some examples of how the Healthier Choice Logo is applied to different food categories.

Table 1: Examples of sugar, fat, and sodium requirements allowing certain products to be eligible for the Healthier Choice Logo

PRODUCT TYPE	REQUIREMENTS FOR ELIGIBILITY FOR A HEALTHIER CHOICE LOGO	
Ready-to-drink beverages	**Sugar*** Maximum 6 g per 100 ml	
Instant pasta and noodles	**Total Fat** Maximum 20 g per 100 g	**Sodium** Maximum 900 mg per 100 g
Ready-to-eat snacks	**Total Fat** Maximum 20 g per 100 g	**Sodium** Maximum 400 mg per 100 g

Note: *Mono- and di- saccharides, not including lactose. No added sweetener or food additives

To promote understanding of the Healthier Choice Logo among adolescents as well as to learn more about adolescent food choices, GAIN supported a programme called *Pelajar Peduli Gizi* (Students for Nutrition). Under this programme, adolescents were supported to collect information and input details from nutritional labels into a website to generate a database of products they regularly consume. It was expected that reading the nutrition information on their snacks or drinks, accessing the website, and inputting answers to a set of questions would make the adolescents better informed about their nutrient intakes and more aware and deliberate around their consumption choices[11].

NUTRIENT PROFILING SYSTEMS GIVE INCONSISTENT SCORES

The Students for Nutrition database contained over 5,730 products consumed by adolescents. Eight products from two product categories – ready-to-drink beverages and instant pasta and noodles – carried Indonesia's Healthier Choice Logo. A further 112 products not carrying the logo were found to be eligible for it. Comparing how the items eligible for the Healthier Choice Logo would score under four other nutrient profiling systems used in Australia, the UK, and countries covered by the World Health Organization (WHO) South-East Asia Regional office (SEARO) and the Pan American Health Organization (PAHO) proved informative. See Table 2 for a brief description of how these four other nutrient profiling systems assign scores.

Table 2: Four nutrition profiling systems to compare to Indonesia's Healthier Choice Logo

Nutrient profiling system	Brief description of score
Australian Healthy Star Rating (AHSR)	Awards between 0 and 5 stars based on levels of energy, saturated fat, sodium, and total sugars. More stars indicates a healthier product.
UK Multiple Traffic Light	L= Low, M=Medium, H=high applied for fat, saturated fat, total sugar, and salt, consecutively (e.g., LLLL is the best score); translated into a "traffic light" logo using red, orange, and green colours.

[8] Mhurchu C, Eyles H, Jiang Y, Blakely T. 2018. Do nutrition labels influence healthier food choices? analysis of label viewing behavior and subsequent food purchases in a labelling intervention trial. Appetite. 121:360-365.; Campos S, Doxey J, Hammond D. 2011. Nutrition labels on pre-packaged foods: a systematic review. Public Health Nutrition.14 (8):1496-1506.

[9] Indonesian Food and Drug Authority. 2019. BPOM Regulation Number 22 Year 2019 about Nutritional Value Information on Processed Food Labels.

[10] Indonesian Food and Drug Authority. 2021. BPOM Regulation Number 26 Year 2021 about Nutritional Value Information on Processed Food Labels.

[11] Adolescents from over 141 districts and 27 provinces were involved, with most coming from around Jakarta and East Java. Between December 2020 and March 2021, they collectively inputted data from 17,124 food labels (after review, some 54% of the inputs (9,259) were found to contain adequate data). More females than males were involved in data collection, with most of the adequate data (7,373) collected by females

South-East Asia Regional Office (SEARO)	A number between 0 and 6 indicating excessive nutrients for total fat (F), saturated fat (SF), total sugars (TS), added sugars (AS), sodium (S), and energy (E). Not all 18 food categories have a threshold for each of the five nutrients and energy. Fewer excessive nutrients indicates a healthier product.
Pan American Health Organization (PAHO)	A number between 0 and 5 indicating excessive nutrients for sodium (S), free sugars (FS), total fat (F), saturated fat (SF), and trans-fat (TF). PAHO only uses one threshold of each nutrient, applied for all products. A lower number indicates a healthier product.

Sources: [12]

Analysis revealed that foods and drinks eligible for the Healthier Choice Logo are not always scored similarly well by other profiling systems. Table 3 summarises how the most frequently consumed products appearing in the database compiled by the adolescents that are eligible for the Healthier Choice Logo score under the four other nutrient profiling systems described in Table 2.

Table 3: How products eligible for the Healthier Choice Logo score under other nutrient profiling systems

Product	UK	SEARO	AHSR	PAHO
Ready-to-drink Beverages				
Frisian Flag Purefarm UHT Swiss Chocolate Flavoured Milk 459mL	LLML	0	0.5 Stars	3 (FS, SF, TF)
Nestle Bear Brand Sterilized Milk 189mL	MHML	0	0.5 Stars	4 (FS, F, SF, TF)
Nestle Dancow Forti Gro Chocolate Flavoured Milk 110mL	LLML	0	0.5 Stars	4 (S, FS, F, SF)
Instant Pasta and Noodles				
Indofood Supermi Nutrimi Instant Noodle Chicken Steak Flavoured 80gr	HHMH	3 (F, SF, S)	0.5 Stars	3 (F, SF, S)
Lemonilo Instant Noodle Spicy Korean Flavoured 85gr	MMLH	1 (S)	0.5 Stars	2 (TF, S)
Lemonilo Instant Noodle 80 gr	MMMH	3 (F, SF, S)	0.5 Stars	2 (TF, S)
Bakery goods				
Mayora Roma Marie Gold Biscuit 240gr	HHMM	4 (F, TS, S, E)	1.5 Stars	3 (FS, F, SF)
Nabati Nextar Brownies coco delight 42gr	HHMM	3 (F, TS, E)	0.5 Stars	3 (FS, F, SF)
Ready-to-eat Snacks				
Jack n Jill Piattos Seaweed Flavour 11gr	HMLM	3 (F, S, E)	3 Stars	3 (S, F, SF)
Oishi Pillows Extrudate Snack Chocolate Cream 110 gr	HHHM	2 (F, E)	0.5 Stars	3 (FS, F, SF)

Most of the drinks as well as the ice cream products scored relatively well under the UK multiple traffic light and SEARO profiling systems, but scored poorly under PAHO and AHSR, owing to sugar and fat content above threshold levels. For these food categories, the UK traffic light system applied higher sugar and fat thresholds levels compared with PAHO and AHSR, while under the SEARO system, only fat and added sugar thresholds were provided for this food category.

All the biscuit products had at least three nutrients that exceeded the thresholds under the SEARO and PAHO systems and scored poorly under AHSR. They also scored as having high fat and saturated fat according to the UK traffic light system. Similar results were found for those in the snack category, which exceeded the fat and sugar thresholds.

The results across product categories show that most of the sweetened products exceed some sugar thresholds. More attention should be given to the sugar threshold within the Healthier Choice Logo, especially since average per capita sugar consumption in Indonesia exceeds the 10% of total energy intake recommended by the WHO as a limit[13]. Some 5.5% of Indonesia's population aged ≥ 15 years old has high sugar consumption (defined by Indonesia's Ministry of Health in terms of total sugar consumption of more

[12] Australian Department of Health. 2021. Health Star Rating System Calculator and Style Guide; [PAHO] Pan American Health Organization. 2016. Nutrient Profile Model. PAHO: Washington DC (US); United Kingdom Department of Health. 2016. Guide for Creating a Front of Pack (FoP) Nutrition Label for pre-packed Products Sold Through Retail Outlets [internet]. Available from: https://www.gov.uk/government/publications; World Health Organization. 2017. WHO Nutrient Profile Model for South-East Asia Region [internet]. Available from: IRIS Home (who.int).

[13] World Health Organization. 2015. *Guideline: sugars intake for adults and children*. World Health Organization. WHO recommendations refer to free sugars rather than total sugars. The Healthier Choice Logo also refers to free sugars.

than 50g/person/day)[14], and this is rising, contributing to increasing diabetes prevalence, which grew from 6.9% in 2013 to 8.5% in 2018[15,16].

Foods in the instant noodles and snacks categories did not have comparable scores to the other nutrient profiling systems because of the higher threshold for sodium in the Indonesian guidelines. This creates potential problems from a public health perspective because the high consumption of sodium is associated with higher blood pressure, a risk factor for heart disease[17]. Moreover, average sodium consumption in Indonesia is around 2,702 mg/day (2014 figure),[14] exceeding the recommended limit of 2,000 mg/day[18]. This contributes to a high and rapidly rising prevalence of hypertension, which grew from 8.3% in 2013 to 34.1% in 2018 [15,16]. Box 1 illustrates why some inconsistencies appear across nutrition profiling systems.

Box 1: Examples of inconsistencies across nutrition profiling systems

Several differences observed across the scoring arise from the higher maximum acceptable levels of sodium, sugar, and fat allowed under the Healthier Choice Logo.

e.g., Indonesia's Healthier Choice Logo vs UK multiple traffic light

Sugar threshold = 20g/100g for bakery products (e.g., biscuits)

Sugar threshold = >22g sugar/100g labelled red; 8-22g/100g labelled amber, and <8g/100g labelled green

Different types of nutrients are also used to set thresholds. For example, total fat and saturated fat measures are not used in Indonesian guidelines for milk products and derivates, while the other systems include them.

e.g., Indonesia's Healthier Choice Logo vs PAHO labelling

No thresholds for saturated fat

Excessive saturated fat if calories from saturated fats are 10% or more of total calories

A WAY FORWARD

While schemes like the Healthier Choice Logo show promise, adjusting the thresholds it uses would more accurately reflect the relative health of different products. The thresholds used to determine eligibility for the Healthier Choice Logo for each critical nutrient should be determined by considering the recommended daily nutrient intakes for preventing diet-related noncommunicable diseases (NCDs), as set out in WHO guidance, for example the WHO Population Nutrient Intake Goals for preventing obesity and NCDs.[19] In addition, if a revised Healthier Choice Logo were made mandatory, many more products would likely be covered by the labelling scheme, increasing its potential for impact.

[14] Indonesian Health Ministry. 2014. Indonesian Total Diet Study 2014.Indonesian Health Ministry

[15] Indonesian Ministry of Health. 2013. National Health Survey Report. Indonesian Ministry of Health.

[16] Indonesian Ministry of Health. 2018. National Health Survey Report. Indonesian Ministry of Health.

[17] Leyvraz M, Chatelan A, da Costa BR, Taffé P, Paradis G, Bovet P, Bochud M, Chiolero A. 2018. Sodium intake and blood pressure in children and adolescents: a systematic review and meta-analysis of experimental and observational studies. Int J Epidemiol. 47(6):1796-1810. doi: 10.1093/ije/dyy121

[18] World Health Organization. 2012. *Guideline: sodium intake for adults and children*. World Health Organization.

[19] World Health Organization. 2003. Diet, nutrition and the prevention of chronic diseases: report of a Joint WHO/FAO Expert Consultation. WHO Technical Report Series, No. 916. Geneva: WHO