

INTRODUCTION OF FRONT OF PACKAGE LABELLING (FOPL) IN JAMAICA: A POLICY PERSPECTIVE

Recently, the Government of Jamaica took a decision that the CRS 5: 2010 Standard Specification for the Labelling of Pre-packaged Foods to include Front of Package Labelling should, in addition to the “High-In” Octagon Model, include other FOPL, in line with our major trading partners.

The introduction of FRONT OF PACKAGE LABELLING (FOPL) for prepackaged foods in Jamaica is of considerable importance and has generated widespread interest and discussions among various stakeholders regarding its implementation. The revision of the *CRS 5: 2010 Standard Specification for the Labelling of Pre-packaged Foods to include Front of Package Labelling (FOPL)* is a regional initiative of the CARICOM Regional Organization for Standards and Quality (CROSQ) and is being advanced as a voluntary standard for CARICOM Member States. Consequently, there has been a thrust at the national and regional levels to improve nutritional labelling and introduce mandatory front of package warnings to consumers.

The Objective of FOPL

The objective of FOPL is to provide the consuming public with information on the content of **sodium/salt, fats, saturated fats, trans-fats and sugar** in pre-packaged foods to assist consumers in making healthy decisions and reduce the incidence of non-communicable diseases (NCDs) and obesity. Internationally, there are several FOPL models such as the “High-In” Octagon Model, the Facts Upfront System (used in the USA), the Multiple Traffic Light System (used in the UK), the Nutri-Score System, the Health Star Rating System, and the Reference Intake System among others.

The Government of Jamaica recognizes the negative effects of Non Communicable Diseases (NCDs) on the health of the Jamaican population, the importance of diet in combatting NCDs and the role that FOPL can play in better consumer choice in relation to food purchase and consumption. As policy makers, it is necessary to ensure the crucial balance between health concerns, the realities related to food consumption, the need to allow for trade to be conducted freely with our major trading partners to ensure competitiveness, limiting the complexities in trade as well as unfair trading practices, while also ensuring the best prices for local consumers.

Choice of Model(s)

The current conversation surrounds the inclusion of the “High-In” Octagon Model, as the only FOPL labelling option in the CARICOM Regional standard, currently being developed by the CROSQ. The point of divergence is that some stakeholders do not accept the “High-In” Octagon Model as the ‘best fit’ and single model for the country, while others contend that it may be the most effective and is therefore the model to be utilized in Jamaica.

This conversation is particularly important as the “High-In” Octagon Model is currently utilized in less than seven (7) countries worldwide, primarily in South and Central America. It is important to note that none of countries that implement the “High-In” Octagon Model are our major trading partners; the USA, UK, EU, Japan or Canada. Canada however is considering utilizing an adapted version of warning symbols synonymous with elements of the “High-In” Octagon Model, utilizing its own nutrient profile and classifications. (See possible depictions below) The “High-In” Octagon Model utilizes the PAHO Nutrient Profile System which has been the subject of widespread discussion across the private sector in CARICOM as manufacturers perceive that more than 90% of the products produced in CARICOM would not be able to meet the requirements of the PAHO Nutrient Profile System.

Official Position on the Implementation of FOPL in Jamaica

It is important to state publicly that the Jamaican Government on a whole is fully supportive of the introduction of Front of Package Labelling (FOPL) for prepackaged foods in Jamaica, noting its strength in the fight against Non-Communicable Diseases (NCDs) and Obesity. It is further important to also note that the *Government of Jamaica has never voted against the inclusion of the High-In Octagon Model of FOPL in the informative annex of Revised CRS 5: 2010 Standard Specification for the Labelling of Pre-packaged Foods.*

The position of the Jamaican Government remains that other FOPL labelling models must be included, along with the “High-In” Octagon Model in the CARICOM Standard.

The only way of guaranteeing that additional FOPL models are added to the Draft Standard is to “not accept”, with comments, the current draft as presented - commenting that additional FOPL models, in line with our major trading partners, should be included prior to the approval of the standard. This Ministry recognizes that this position is point of difference among advocates for

health but maintains that this is the most logical position in the interest of balancing trade, public health and industry.

The current decision by the government allows for greater flexibility in any final decision by the Jamaican government, in collaboration with its stakeholder, including health advocates. Where other options are included the government may at a later date select from the options presented based on our specific cultural, practical and legislative realities or develop its own unique model.

Widespread Consultations among the Major Stakeholders

A series of stakeholder meetings have been held with all the major stakeholders involved, including the private sector, government, academia, civil society and consumer groups. All the stakeholders are in full support of the introduction of FOPL in Jamaica to assist with combatting the negative effect of NCDs and the general health of the population and the majority of the stakeholders agree that additional models should be included in the standard.

Recent indications among the Members of CROSQ suggest that the position of Jamaica regarding the need for inclusion of other FOPL models is similar to that of various other CARICOM countries. The CARICOM Private Sector Organization (CPSO) has successfully advocated to the Council on Trade and Economic Development (COTED) for an Impact Assessment Study, to be undertaken by that group prior to the approval of the standard by the COTED. As a result, the impact assessment study will occur concurrently with the CROSQ standard development process and in time for consideration of the COTED at its next meeting scheduled for November 2021.

Implementation at the National Level

Symbolic of any voluntary standard, the Government of Jamaica will have the option to adopt, make adjustments, modify or reject the CARICON Standard for implementation within its domestic jurisdiction. The Government of Jamaica will make this decision at the time of implementation, in accordance with our local interests. As Government, the thrust towards implementation must be lead and determined by a cohesive and balanced national policy, implemented only after considering the interests of all the stakeholders and interest groups involved and measured against the overall objective of the policy measure.

Importance of Complimentary Measures

It cannot be understated that the FOPL model to be adopted locally is of significant national importance and has substantial implications for health, trade, industry, commerce and government regulatory practices. The FOPL model selected will require significant “buy in” from all the relevant stakeholders across the government, academia, civil society, consumers and the private sector and will require complimentary initiatives to achieve its objective.

The implementation of FOPL must be supported by the implementation of complementary legislative, policy and regulatory measures. Additionally, whatever model is agreed on will need to be supported by robust public education, sensitization and awareness. These supporting measures combined must be in place to ensure compliance, public awareness, widespread sensitization and stakeholder buy-in. This is a consistent approach among all countries where FOPL has been introduced. At the appropriate time, the Government of Jamaica will once again enlist the support of all stakeholders as it seeks to balance the various interests.

The timing of the introduction of the FOPL requirements is also critical. The Jamaican economy remains fragile at this point as the country seeks to recover from the impacts of the COVID 19 pandemic and combat some of the highest inflation on consumer goods. It is therefore important that we prevent any disruption in the economic stability of the country, secure consumers from additional cost and mitigate against any widespread negative implications.

The implications associated with the issue are varied and are listed in the table below:

General Implication	Regulatory Implication
1. The reformulation of products to meet the requirements of the appropriate Nutrient Profile System may be necessary.	1. The National Compliance and Regulatory Authority (NCRA) would need to build capacity to administer the new measures.
2. Where the standard is approved with only the “High-In” Model included, Jamaican manufacturers that utilize a different model may face discrimination in other markets	2. Where all shipments are not inspected at the ports of entry, importers would have to submit labels for assessment prior to importation and backlogs may occur.
3. There will likely be a financial cost associated with switching between labels for different markets and to re-design labels and packages in order to be compliant.;	3. A phasing period will likely be required to allow the country to adapt to the new measures.

4. Any additional cost incurred would likely be passed on to consumers making some items more expensive;	4. A series of supplementary measures, including strict regulations would have to be developed and implemented simultaneously.
5. The manufacturing sector has been adversely affected by COVID-19 and is not yet operating at full recovery.	5. Public education and sensitization will be required to inform the population of the new measures and the standard.

Conclusion

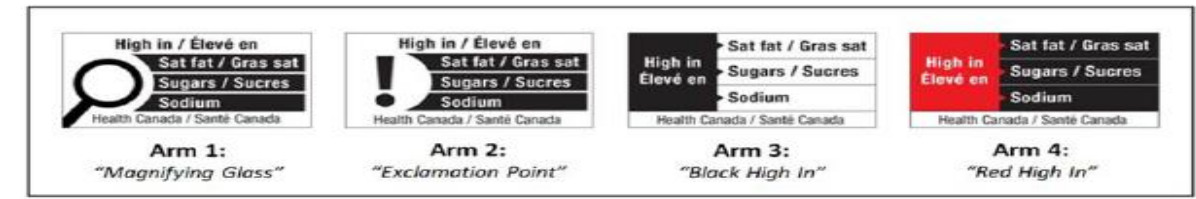
The Government of Jamaica does not take any of the views of its stakeholders lightly and has facilitated several stakeholder consultations across all stakeholder groups over several months. The national position advanced to the CROSQ is supported at the highest level of executive decision making in the country. The decision taken by the Government is not a disagreement with the general objective of FOPL in Jamaica but an indication of a balanced approach and that consideration must be given to the addition of other FOPL models, including the ability to develop a hybrid local FOPL model for Jamaica and Jamaicans.

Examples of Front of Package Labelling Models Utilized World-wide

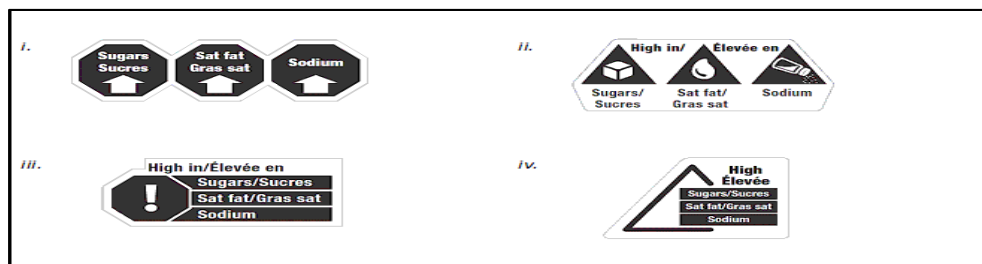
High-In Octagon Model Chile



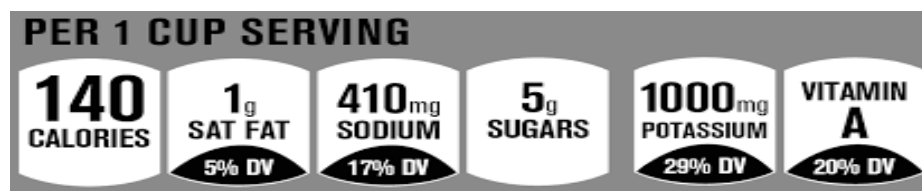
High-In Octagon Model Canada



Other FOP "high in" symbol under consideration by Health Canada



Facts up Front System (USA)

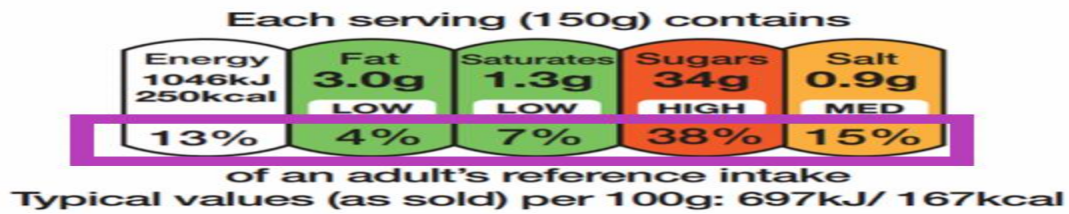


Facts Up Front consists of a set of rounded, rectangular plaques or icons. Each plaque or icon represents quantitative information on the calories and specific nutrients in the food.

GDA Color Coded Model EU & UK

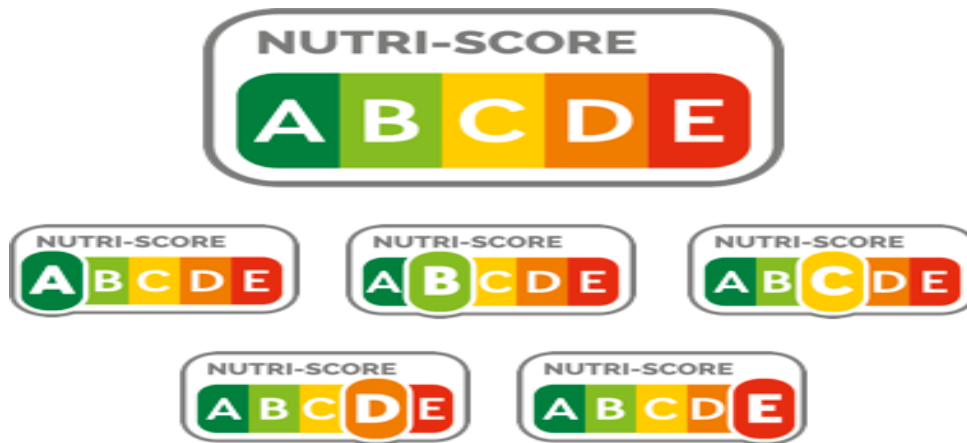


Multiple Traffic Light System (UK)



Multiple traffic light (MTL) signposts use visual cues such as colour codes or symbols to communicate an evaluation of the product's critical nutrient content.

Nutri-Score System (France)



The Nutri-Score is a nutrition label that converts the nutritional value of products into a simple code consisting of 5 letters, each with its own colour. Each product is awarded a score based on a scientific algorithm. At a glance, one can observe which products are recommended and which should be avoided.

Health Star Rating System – Australia & New Zealand



The Health Star Rating System is a front-of-pack food labelling system which rates the healthiness of packaged food and assigns it a rating from half a star to 5 stars, with a 5-star rated product the healthiest choice.