

LOW IN
SUGAR

LOW IN
SATURATED
FATS

LOW IN
TRANS
FATS

LOW IN
SODIUM

CIVIL SOCIETY POSITION PAPER ON THE FOOD AND NUTRITION POLICY

February 2025



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Summary

This is a Civil Society Position Paper on the Food and Nutrition Policy authored by the Center for Food and Adequate Living Rights. The purpose of the paper is to make recommendations intended to improve the Uganda National Food and Nutrition Policy in ways which include Front of the Package Warning Labelling (FOPWL).

This is intended to promote food safety by protecting consumers of processed foods from foods to be realized by regulating not only the processing but also the marketing and advertisement of food and beverages. Packaging should include clear front-of-pack nutritional information and warning labels to help consumers make informed choices, particularly regarding foods and beverages high in sugar, salt, and fats. This will reduce case consumption of nutrients harmful to health, including ingredients that pre-dispose both adults and children to obesity and non-communicable diseases.

The paper makes the following recommendations: (i) Include FOPWL in the Food and Nutrition Policy; (ii) Maintain FOPWL in the Food and Nutrition Bill, 2024; (iii) Adopt FOPWL regulations under the Public Health Act; (iv) Include marketing restrictions in the Food and Nutrition Policy; and (v) Include provisions on public food procurement in schools in the Food and Nutrition Policy to ensure healthy foods.

I. Introduction

Uganda is reviewing the Uganda Food and Nutrition Policy (UFNP) of 2003. One of the key aspects that should be focused on is food safety. This can be achieved through a package of healthy food policies like system of Front of the Package Warning Labelling (FOPWL). According to the WHO, one of the key drivers of not only NCDs but also obesity is the “consumption of foods high in sugar, salt, and fats, including saturated fats and trans-fats”.¹ Most affected are children when exposed to media that advertises the foods above. To counter these unhealthy foods, WHO has indicated that this can be achieved by “maintaining healthy weights from childhood and consuming foods that are low in saturated fat, trans-fatty acids and salt”.² One of the ways of managing this is to regulate the marketing of the unhealthy foods high in sugar, salt and fats as mentioned above.

One of the outcomes of the Sixty-Third World Health Assembly was a Resolution on Marketing of Food and Non-alcoholic Beverages to Children.³ It was resolved that states should “identify the most suitable policy approach given national circumstances and develop new and/or strengthen existing policies that aim to reduce the impact on children of marketing of foods high in saturated fats, trans-fatty acids, free sugars, or salt”.⁴ The WHO has also made very specific recommendations for strategies that could be adopted to manage the marketing and consumption of the foods: (i) Fiscal measures such as taxation of sugar-sweetened beverages (SSBs); (ii) Implementing recommendations on the marketing of unhealthy foods and non-alcoholic beverages to children; and (iii) Implementing a standardized nutrient labelling system with interpretative front-of-pack warning labelling (FOPWL). The purpose of this paper is to make recommendations that could inform the review of the UFNP in order to ensure that it regulates processing and marking food in order to protect the public of unsafe foods.

¹ World Health Organisation Nutrient Profile Model for the WHO African Region: A Tool for Implementing WHO Recommendations on the Marketing of Food and Non-Alcoholic Beverages to Children (2019), at p 1.

² As above.

³ Sixty-Third World Health Assembly, 17th – 21st May 2010, Geneva, Switzerland, WHA63/2010/REC/11, Resolution WHA63.14.

⁴ As above, para 2(2).

It is argued that to achieve this, the Policy should incorporate improve the Uganda National Food and Nutrition Policy in ways which include FOPWL. FOPWL are labels on the front of food packages which indicate the nutrient profile of a product indicated in a simple and graphic manner to inform and warn consumers of the product.

2. Urgent Action Needed to Tackle Malnutrition, Obesity

There are several studies in Uganda on the state of malnutrition and the causes of these.⁵ It has been demonstrated that mortality of children under 5 years of age due to acute malnutrition is high.⁶ A study of landslide prone Bududa demonstrated that underweight was at 37.7%, wasting at 13.3%, and overweight at 4.3%.⁷ A number of proposals are made to overcome the problems, including improving information systems in order to enable good food saturation and availability in the country.⁸

While undernutrition remains a big problem as demonstrated by studies above, obesity also presents itself as a problem. Consumption of foods that are low in nutrients yet high in sugar, something which is contributing to obesity.⁹ Indeed, a 2024 study shows that Uganda is leading as far as the rates of consumption of sugar sweetened beverages (SSBs) is concerned.¹⁰ Uganda is also “fighting with persistent problems of undernutrition, stunting, and wasting while concurrently experiencing a burden of overnutrition due to the rapid rise in overweight, obesity, and diet-related noncommunicable diseases”.¹¹ Obesity and overweight are on the rise. Overweight was 9.77% in 1995 and 16.21% in 2016 and obesity moved from 1.99% in 1995 to 6.21% in 2016.¹² This data shows that the country is sitting with a big problem, showing that between 1996 and 2016, overweight almost doubled and obesity tripled.

There are various factors associated with overweight, including low physical activity, higher sedentary behavior, dietary behaviour including consumption of foods high in sugar, and psychosocial factors, among others.¹³ While physical activity as suggested here may play a role, it remains important to deal with the dietary related factors mentioned here.

2.1. Marketing of Unhealthy Foods and beverages to children

In Uganda, as in many countries, the overconsumption of foods high in fat, sugar, and salt is a major risk factor for childhood obesity and overweight.

5 See Yusuf Adebayo Adebisi et al “Prevalence and Socio-economic Impacts of Malnutrition Among Children in Uganda” (2019) 12 *Nutrition and Metabolic Insights* at <https://journals.sagepub.com/doi/10.1177/1178638819887398>

6 Damalie Nalwanga et al “Mortality among children under five years admitted for routine care of severe acute malnutrition: a prospective cohort study from Kampala, Uganda” (2020) 20 *BMC Pediatrics* 1.

7 Aziiza Nahalomo et al “Malnutrition and Associated Risk Factors among Children 6–59 Months Old in the Landslide-Prone Bududa District, Eastern Uganda: A Cohort Study” (2022) 6 *Current Developments in Nutrition*, available at <<https://www.sciencedirect.com/science/article/pii/S2475299122000178>> (accessed on 13th November 2024).

8 As above.

9 Morgan Bradley et al “Obesity and malnutrition in children and adults: A clinical review” (2023) 28 *Obesity Pillars* 1

10 Lara-Castor et al “Intake of sugar sweetened beverages among children and adolescents in 185 countries between 1990 and 2018: Population Based Study” (2024) *BMJ* 386, available at <<https://www.bmj.com/content/386/bmj-2024-079234>>

11 Oumy Erica Wie Dia et al “Mapping of outdoor food and beverage advertising around primary and secondary schools in Kampala city, Uganda” (2021) 21 *BMC Public Health* 707, at p 3.

12 Yaya S and Ghose B “Trend in overweight and obesity among women of reproductive ageing Uganda: 1995–2016” (2019) 5 *Obesity Science & Practice*, available at <<https://onlinelibrary.wiley.com/doi/epdf/10.1002/osp4.351>> (accessed on 13th November 2024).

13 Karl Peltzer and Supa Pengpid “Overweight and Obesity and Associated Factors among School-Aged Adolescents in Ghana and Uganda” (2011) 8 *International Journal of Environmental Research and Public Health*.

This issue is largely driven by the uncontrolled and aggressive marketing of unhealthy foods and studies have shown that most of the advertisements of foods and beverages are usually done around schools. It has been established that 86% of food adverts were for unhealthy foods with an average of 36 unhealthy food ads around each school.¹⁴

Unfortunately, however, there is no policy or law regulating food and non-alcoholic beverage advertisement in Uganda which is mostly affected children exposed unhealthy foods. For instance, there are no legal or policy guidelines on advertising and on the production and distribution of foods with high sugar, salts and fats. Regulations on food fortification are acknowledged.¹⁵ These though cannot be used with respect to food sweetening and fat processing, the exception are the Food and Drugs (Marketing of Infant and Young Child Foods) Regulations. There are therefore a number of regulatory gaps that need to be filled. As illustrated below, the Uganda Food and Nutrition Policy of 2003 has not adequately done this.

3.0. The Uganda Food and Nutrition Policy, 2003

The UFNP, adopted in 2003, aims to ensure food security and improve nutrition through multi-sectoral efforts. Key objectives include promoting food availability, accessibility, and affordability, integrating nutrition education into training, and enhancing food safety and quality.¹⁶ The overall objective of the policy was to promote the nutritional status of the people of Uganda through multi-sectoral and coordinated interventions that focus on food security, improved nutrition and increased incomes. This paper assesses the extent to which the Policy deals the recognition of food as a human right; regulation of the processing of food to ensure it is healthy and safe; and regulation of marketing of unhealthy foods and beverages.

3.1. Recognition of food as a human right

The 1995 Constitution does not expressly recognise the right to adequate food. However, it has several provisions which could be used to read the right into the law. One such provision is Objective XIV of the National Objective and Directive Principles of State Policy which requires the state to fulfill the fundamental rights of all Ugandans to social justice and economic development by among others ensuring the enjoyment of adequate food security. Objective XXII requires the state take appropriate steps to encourage people to grow and store adequate food. The state is also required to establish national food reserves.

The UFNP acknowledges the right to food as a human right, aligning with international agreements such as the ICESCR and the African Charter. It emphasizes the need for availability, accessibility, and quality food, although there is a lack of explicit commitments for state accountability and rights protection. This recognition is reflected in the objectives of the UFNP, which includes the objective “to ensure availability, accessibility, affordability, of food in quantities and qualities sufficient to satisfy the dietary needs of individuals sustainably”.

This objective appears to directly draw from the elaboration of the right in General Comment No. 12. In addition, almost all the areas of focus detailed by the UFNP somehow contribute to the realisation of the elements of the right. The relevant areas of focus include the following:

¹⁴ Oumy (note 12 above), at p 8.

¹⁵ See for instance *Food and Drugs (Food Fortification) Regulations, SI 2005 No. 2.*; the *Food and Drugs (Marketing of Infant and Young Child Foods) Regulations, SI 278 – 1*; the *Food and Drugs (Control of Quality) (Iodated Salt) Regulations, SI 278 – 2*; the *Food and Drugs (Prohibition of the Use of Cyclamate) Regulations, SI 278 – 3*; and the *Food and Drugs (Prohibition of the Use of Violet No. 1) Regulations, SI 278 – 4*.

¹⁶ *Food and Nutrition Policy*, at p 4.

Focus Area	Right to Food Element
Food supply and accessibility	Availability, accessibility
Food processing and preservation	Availability, quality
Food storage, marketing and distribution	Availability and accessibility
Food aid	Availability, accessibility
Food standards and quality control	Quality
Nutrition	Dietary needs
Gender, food and nutrition	Non-discrimination

In spite of the above, the Policy does not clearly define the rights of persons as rights holders and the obligations of the state as a duty bearer.

3.2. Regulation of the processing of food to ensure it is healthy & safe

Food processing has been defined as to include “a wide variety of treatments on food materials such as mechanical treatment, heating, cooling, drying, high pressure, acid and alkaline treatments, fermentation and more”.¹⁷ Food processing can on the negative side produce harmful chemical compositions.¹⁸ Some of the benefits of food processing have been identified to include “destruction of food-borne microbes and toxins, improved bioavailability of nutrients, extension of shelf life, improved sensory characteristics and functional properties”.¹⁹

The UFPN recognizes the importance of food processing and aims to promote traditional food processing methods while encouraging fortification. However, it does not directly address the regulation of unhealthy foods high in sugar, salt, and fat, despite the growing concern around processed foods.

3.3. Regulation of marketing of unhealthy foods and beverages

Marketing of food and beverages plays a big role in consumers making their food choices and could entice people to consume food, both healthy and unhealthy. Yet, food choices and intake are some of the crucial factors that influence a person’s health and nutritional status.²⁰ Indeed, some studies have established the relationship between food advertising and obesity.²¹ Most affected in this regard are children.²² It is for these reasons that many jurisdictions have now moved to regulate the marketing of unhealthy foods and beverages.

¹⁷ Jinkai Zheng and Hang Xiao “The Effects of Food Processing on Food Components and Their Health Functions” (2022) 2 *Frontiers in Nutrition* 1, at p 1.

¹⁸ As above.

¹⁹ Ann Augustin et al “Role of food processing in food and nutrition security” (2016) 56 *Trends in Food Science & Technology* 115, at p 117.

²⁰ Sowley Kalog et al “Food advertisement influences food decision making and not nutritional status: a study among university students in Ghana” (2022) 8 *BMC Nutrition* 1, at p 2.

²¹ See Juan Rodríguez Delgado et al “Unhealthy food advertising. A position paper by the AEP Committee on Nutrition and Breastfeeding” (2022) 97 *Anales de Pediatría* 206.

²² Megan LoDolce *Food Marketing to Children: A Wolf in Sheep’s Clothing?* Obesity Action Coalition, available at < <https://www.obesityaction.org/resources/food-marketing-to-children-a-wolf-in-sheeps-clothing/> > (accessed on 16th November 2024).

The WHO recommends mandatory regulation of marketing of foods high in fat, sugar and salt to children with policies to protect children from the harmful impacts of aggressive and pervasive marketing by the food industry.²³ One of the strategies which has been used to regulate marketing is by prescribing the forms the marketing should take. This includes what has been described as Nutrient Profiling intended to inform policies and regulations on FOPWL, marketing restrictions, and school feeding to enable consumers make informed decisions on healthy and unhealthy foods. WHO has looked at FOPWL as a “tool through which governments can guide consumers to make informed food purchases and healthier eating choices”.²⁴ It is in this regard that WHO has defined FOPWL as labelling systems that: (i) are presented on the front of food packages (in the principal field of vision) and can be applied across the packaged retail food supply; (ii) comprise an underpinning nutrient profile that considers the overall nutrition quality of the product or the nutrients of concern for NCDs (or both); and (iii) present simple, often graphic information on the nutrient content or nutritional quality of products, to complement the more detailed nutrient declarations usually provided on the back of food packages.²⁵

In the same regard, WHO has defined “nutrient profiling” as “the science of classifying or ranking foods according to their nutritional composition” and take different forms, including “setting threshold amounts that meet a nutrition guideline”, “applying algorithms for food products’ overall nutrition profile” or “basing criteria on nutrient reference values”.²⁶ To support countries, WHO has undertaken regional-based profiling, thereby producing a Nutrient Profiling Model for each region, Africa inclusive. Focus among others being on profiling of foods for children.²⁷ The model profiles various food categories and for each gives the following information: Total fat; saturated fat; total sugar; sodium; and energy. WHO has defined what it has called “Ranges of population nutrient intake goals.

WHO has guided that FOPWL’s focus should be on “packaged, manufactured, processed, or ultra-processed foods that are required to carry a nutrient declaration, presented as ready for sale to the consumer in the retail sector”.²⁸ In addition, WHO has provided guidance on steps that should be taken to establish an FOPWL framework:

- Contextual analysis
- Confirmation of aims, scope and principles
- Establish a government-led stakeholder engagement process
- Select the FOPWL system format

According to WHO, the FOPWL should be guided by certain principles. WHO details these under four titles: (i) Overarching principles; (ii) Principles to collaborative approach to developing FOPL; (iii) Principles for FOPL format; and (iv) Principles on implementation of FOPWL system. WHO details these.²⁹

²³ [https://www.who.int/news/item/03-07-2023-who-recommends-stronger-policies-to-protect-children-from-the-harmful-impact-of-food-marketing#:~:text=The%20guideline%20recommends%20countries%20implement,%2For%20salt%20\(HFSS\).](https://www.who.int/news/item/03-07-2023-who-recommends-stronger-policies-to-protect-children-from-the-harmful-impact-of-food-marketing#:~:text=The%20guideline%20recommends%20countries%20implement,%2For%20salt%20(HFSS).)

²⁴ World Health Organisation Guiding principles and framework manual for front-of-pack labelling for promoting healthy diet available at <https://cdn.who.int/media/docs/default-source/healthy-diet/guidingprinciples-labelling-promoting-healthydiet.pdf?sfvrsn=65e3a8c1_7&download=true>

²⁵ As above.

²⁶ As above.

²⁷ WHO Nutrient Profiling for the African Region: A Tool for Implementing WHO Recommendations on Marketing of Foods and Non-alcoholic Beverages to Children.

²⁸ WHO (note 38 above).

²⁹ As above.

Dietary factor	Goal
Total fat	15–30%
Saturated fatty acids	<10%
Polyunsaturated fatty acids (PUFAs)	6–10%
n-6 Polyunsaturated fatty acids (PUFAs)	5–8%
n-3 Polyunsaturated fatty acids (PUFAs)	1–2%
Trans-fatty acids	<1%
Monounsaturated fatty acids (MUFAs)	By difference
Total carbohydrate	55–75%
Free sugars	<10%
Protein	10–15%
Cholesterol	<300 mg per day
Sodium chloride (sodium)	<5 g per day (<2 g per day)
Fruits and vegetables	≥400 g per day
Total dietary fibre	From foods
Non-starch polysaccharides (NSP)	From foods

Annex I: Detailed profiling model designed for Africa by WHO.

UFNP does not address the regulation of unhealthy food marketing, particularly to children. While the WHO recommends using tools like Nutrient Profiling Models (NPM) and FOPWL, the policy lacks a clear framework to regulate food marketing practices. The Food and Nutrition Bill in Parliament may eventually address these issues. However, the Food and Nutrition Bill, 2024, currently being processed by Parliament somehow address the issues of FOPWL by requiring the Department responsible for nutrition in the Ministry of Health to “advise the Minister on labelling of nutrients on food products”.³⁰ In addition, the Department is also required to advise the Minister on the regulation of the marketing of breast milk substitutes, unhealthy foods and foods procured by public and private institutions and other emerging areas including breast milk banks. With FOPWL consciousness in mind, these functions can be expounded to generate regulations on FOPWL.

4. Comparative approached with FOPWL

A number of countries have heeded the call for FOPWL and adopted policies and legal standards in this regard. The Global Health Advocacy Indicator has profiled FOPWL of ten countries, including: Argentina, Brazil, Canada, Chile, Colombia, Mexico, Israel, Peru, Uruguay, and Venezuela.³¹ In some countries, FOPWL has taken the form of acts of the legislature, while in others it has taken the form of regulations. However, in all these countries, the following have been regulated: Determination of the FOPWL model; label design and location on package; covered products as well as excluded products; Nutrients and additives covered; and enforcement and monitoring agencies, among others. In aggregation, the purpose of the FOPWL in many countries has been to protect public health by requiring the indication of additives to foods beyond the recommended thresholds. This, ultimately, is intended to give consumers information to make informed decisions. It has been demonstrated that FOPWL reduces the perceptions of consumers of healthfulness on products with high levels of nutrients and reduces consumers’ intentions of purchasing products containing high levels of nutrients.

³⁰ Parliament of Uganda, Food and Nutrition Bill, 2024, clause 7(1)(q).

³¹ Global Health Advocacy Incubator FOPWL Regulations Around the Globe, available at <https://dfweawn6ylvgz.cloudfront.net/uploads/2023/FOPWL_Regulations.pdf> (accessed on 25th November 2025).

For policies, that within the first year of implementation, they reduce the percentage of products on the market with high levels of nutrients of concern. That this leads to product reformulation and ultimately improved diets.³²

Annex II Illustrates the approaches different countries have adopted in their FOPWL regulations. Some of these could be replicated by Uganda.

5. Recommendations

(i) Include FOPWL in the UFNP

➤ To the Ministry of Health and the Ministry of Agriculture

There is need for Uganda to put in place an FOPWL system. This is important to guide Ugandan consumers of processed foods and non-alcoholic beverages to make informed choices. In the first place, there is need for the review of the UFNP to expressly address the need for FOPWL. This could be achieved by including provisions that highlight the importance of FOPWL to health and the nutrition of Ugandans. This should be guided by the WHO Nutrient Profiling Model for the African Region and which should be adapted to both solids and liquids. This is in addition to committing to ensuring that there is an FOPWL system in place and laws and regulations to support this.

(i) Maintain FOPWL in the Food and Nutrition Bill 2024

➤ To Parliament and the Ministry of Health

Commitments to the FOPWL in the UFNP should be given legal effect by express mention of the FOPWL. Commendably, this has been done with the inclusion advise on food labelling of nutrients on food products as one of the functions of the Ministry of Health. This position should be maintained. However, this alone is not sufficient. Once the Bill has been enacted into law, the same should be elaborated by FOPWL regulations that should detail the labelling requirements. This should be guided by the WHO Nutrient Profiling Model for the African Region.

This though could be adapted, based on the processed and ultra-processed foods on the market in Uganda and the nutritional needs of the population. The regulations should address the FOPWL areas which have been addressed by the comparative laws highlighted above. This includes the following:

- (i) FOPWL system
- (ii) Label design
- (iii) Label location and size on packages
- (iv) Covered products
- (v) Excluded products
- (i) Adopt FOPWL regulations under the Public Health Act

➤ To the Ministry of Health

FOPWL regulation is a matter of urgency. For this reason, FOPWL and marketing restrictions could be addressed and regulation adopted under other relevant laws. One such law is the Public Health Act.³³ This law gives the minister responsible for the health the power to “make rules for the preservation of health or prevention of disease”.³⁴ This provision is broad enough to be used for FOPWL regulations.

³² Global Health Advocacy Incubator Evidence Sheet: Front-of-Package Labeling, available at < <https://assets.advocacyincubator.org/uploads/GHAI-FOPL-Evidence-Sheet-2024-1.pdf> > (accessed on 23rd February 2025).

³³ Chapter 310 of the Laws of Uganda.

³⁴ Section 77(1).

These could later be integrated in the Food and Nutrition Act once adopted.

(i) Include marketing restrictions in the UFNP

➤ To the Ministry of Health and the Ministry of Agriculture

There is need to develop regulations and guidelines to safeguard against the marketing and consumption of unhealthy foods high in fat, sugar and salt to children based on the provisions under the Food and Drug Act, and the Public Health Act (as amended). These should be guided by the WHO Nutrient Profiling Model for the African Region.

(i) Include provisions on public food procurement in Schools

➤ To the Ministry of Education and Sports

Whereas these provisions are highlighted in school feeding policy being drafted by the Ministry of Education and Sports, the UFNP based on the PPDA Act, should encompass provisions on public food Procurement in schools specifying procurement modalities, structures and standard operating procedures (SOPs) for staff and institutions involved in school feeding preferably based on the adopted Nutrient Profiling Model for Uganda.

6. Conclusion

Proper nutrition is a key determinant of health, and food safety plays a crucial role as part of the right to adequate food and nutrition. States have an obligation to ensure that foods are safe and provide proper nutritional value. This includes regulating not only the processing but also the marketing and advertisement of food and beverages. Packaging should include clear front-of-pack nutritional information and warning labels to help consumers make informed choices, particularly regarding foods and beverages high in sugar, salt, and fats. Such measures are essential for addressing non-communicable diseases (NCDs).

Tools like the Nutrient Profiling Model (NPM) and policies such as Front-of-Pack Warning Labels (FOPWL), making it mandatory to display nutritional information prominently, can address increasing NCD rates. WHO's guidance on food nutritional information provides a framework that can be adapted by countries to implement these measures effectively.

At the moment, Uganda does not have FOPWL regulations and neither does it have marketing restrictions for over nutritious foods. Indeed, neither FOPWL nor marketing restrictions appear in the UFNP, currently under review. However, the Food and Nutrition Bill, 2024 has provisions that could be used for FOPWL. It is proposed that these be maintained and when adopted should be used to adopt detailed regulations. Nonetheless, due to the urgency of the matters, it is argued that FOPWL and marketing regulations should be adopted under the Public Health Act. The form and content of the regulations has been indicated, as inspired by comparative regulations from other countries. FOPWL should also be captured in the process of review of the UFNP.

Annex I: WHO Nutrient Profiling Model for the African Region

Food Category		Examples of food items	Codex Food Category code	Marketing prohibited if thresholds exceed values per 100 g ²¹⁰					
				Total fat (g)	Saturated fat (g)	Total sugars (g)	Added sugars (g) ¹¹	Sodium (g)	Energy (kcal) ¹²
1	Chocolate and sugar confectionery, energy bars, sweet topping and desserts	Cocoa/Chocolate bars (including milk, dark and white chocolate) chocolate spread, imitations and chocolate substitutes, cereal, granola and muesli bars, table sugars, flour-based confectionaries, hard soft and chewy candy, chewing gum, caramels, soft jellied candies, marshmallow, sweet sauces, sweet desserts, creamy desserts, hard boiled sweets (such as lollipop)	5.1.1, 5.1.2 (except for products used to prepare chocolate milk or hot chocolate), 5.1.3, 5.1.4, 5.1.5, 5.2, 5.3, 5.4	8.0	No threshold provided	6.0	No threshold provided	No threshold provided	230
2	Cakes, sweet biscuits and pastries, other sweet bakery products, dry mixes for making such ¹³	Pastries: croissants, Cakes, cookies, pies, doughnuts, sweet rolls, muffins, macaroons, breakfast biscuits (such as chocolate-covered biscuits), sweet pancake (ready-to-eat form), Buns with sweet fillings, Maandazi, chocolate pudding, plum pudding, bread pudding	7.2	8.0	No threshold provided	6.0	No threshold provided	0.25	230
3	Bread, bread products and crisp bread	Bread and rolls, crackers, mixes for making bread and ordinary bakery wares, mixes for making pizza, savoury pancake, wraps/tortillas, bread with raisins, buns, bread with cereal, rusks	7.1	8.0	No threshold provided	6.0	No threshold provided	0.25	No threshold provided
4	Breakfast cereals	Whole, broken or flaked grains of rice and other cereals, rice-based, wheat-based or maize-based breakfast cereals of all flavours, oat meal, mueslis, rice cakes, porridge (dried, as	6.1, 6.3, 6.7	12.0	No threshold provided	9.0	No threshold provided	0.35	No threshold provided
5	Ready-to-eat savouries (savoury snack foods) ¹⁴								
	(a) ready to eat savoury snacks Potato, cereal or starch-based (from roots, tuber, or legumes)	Popcorn, other snacks made from rice, maize, wheat, potato, cassava, plantain (i.e. chips, crisps)	15.1	8.0	No threshold provided	No threshold provided	0.0	0.25	230

Food Category	Examples of food items	Codex Food Category code	Marketing prohibited if thresholds exceed values per 100 g ⁹¹⁰					
			Total fat (g)	Saturated fat (g)	Total sugars (g)	Added sugars (g) ¹¹	Sodium (g)	Energy (kcal) ¹²
(b) Processed nuts and edible seeds	Nuts, and mixed nuts (including with fruit content), edible seeds	15.2	No threshold provided	No threshold provided	No threshold provided	0.0	0.05	No threshold provided
(c) Fish-based	Fish-based snacks	15.3	No threshold provided	No threshold provided	6.0	No threshold provided	0.25 ¹⁵	230
6	Beverages							
(a) Juices	100% fruit and vegetable juices prepared from fresh or reconstituted from concentrate, smoothies	14.1.2, 14.1.3	No threshold provided	No threshold provided	6.0	0	0.30 ¹⁶	No threshold provided
(b) Milk and dairy based drinks ¹⁷	Milks and sweetened milks, reconstituted powdered milk, flavoured dairy products a, sour milk, fermented dairy-based products (chocolate milk, strawberry milk, cocoa, drinking yoghurt), condensed milk, milk shakes, sweetened creamer. <i>Milk means milk from animals such as cows, goats, camels etc.</i>	1.1	4.0 ¹⁸	No threshold provided	No threshold provided	0.0	No threshold provided	No threshold provided
(c) Water- based flavoured and unflavoured drink	Sport, energy drinks ¹⁹ , electrolyte drinks, carbonated and non-carbonated water-based flavoured drinks (i.e. soft drinks), powdered juices, concentrates (liquid or solid) calculated as or in ready-to-drink form, flavoured waters (sparkling), reconstituted chocolate or malted powdered drinks, syrups, sugar cane juices	14.1.4	No threshold provided	No threshold provided	0.0	No threshold provided	0.1	No threshold provided
(d) Coffee, coffee substitutes, tea, herbal infusions	Coffee, including instant and premixed coffee, coffee substitute, tea including instant and premixed tea, herbal infusion to be prepared or in ready-to-drink form	14.1.5	No threshold provided	No threshold provided	0.0	No threshold provided	No threshold provided	No threshold provided

Food Category		Examples of food items	Codex Food Category code	Marketing prohibited if thresholds exceed values per 100 g ⁹¹⁰					
				Total fat (g)	Saturated fat (g)	Total sugars (g)	Added sugars (g) ¹¹	Sodium (g)	Energy (kcal) ¹²
	(e) Cereal, legumes, grain, tree nut-based beverages	Cereal, grain and tree nut-based beverages produced from the extracts of cereals, pulses and tree nuts (e.g. rice-, almond-, soya, oat-based beverages).	14.1.5, 6.8.1	No threshold provided	No threshold provided	6.0	0.0 ²⁰	0.1	No threshold provided
7	Frozen dairy-based desserts and edible ices	Ice cream, ice milk, frozen yoghurt, ice lollies and sorbets	1.7, 3	6.0	No threshold provided	12.0	No threshold	0.10	230
8	Other dairy based desserts	Dairy based products that have been curdled by fermentation, acid, enzyme, heat, etc. and flavoured with sugar and other ingredients. Examples are flavoured cream-type yoghurt, jellied milk, butterscotch, chocolate mousse, puddings (including rice pudding, milk pudding), flan, custard	1.7	4.0	No threshold provided	6.0	No threshold provided	0.10	230
9	Cheese and analogues	Unripe or ripened cheese, processed cheese, cheese analogues, that can be classified based on physical characteristics as hard (e.g. Parmesan), semi-hard (e.g. cheddar, edam), semi-soft and soft (e.g. mozzarella, ricotta) as well as serving style as sliced cheese, cream cheeses, grated or powdered cheeses, spreadable cheeses, cottage cheese, processed cheese	1.6	20.0	No threshold provided	No threshold provided	0.0	0.60	No threshold provided
10	Composite foods (Prepared foods, ready-made and convenience foods and composite dishes)	Mixtures of multiple components (e.g. meat, sauce, grain, cheese, vegetables). These include foods that require minimal preparation (heating, thawing, rehydrating) or the ready-to-serve meal from restaurants. Examples: frozen and chilled ready meals, pizzas, lasagna, ready-made sandwiches, soups, burgers in buns, ready meals, soups, tinned spaghetti, baked bean, filled pastas, French fries	16, 12.5.1, 12.5.2	12.0	3.5	9.0	No threshold provided	0.35	No threshold provided
11	Butter and other fats and oils, and fat emulsions	Vegetable oils and fats, lard, ghee, fish oils and other animal fats, butter, margarine and similar products. Examples: cooking oils from plant and animal sources, fat blends, nuts spread (e.g. peanut butter)	2.1, 2.2	No threshold provided	35.0	No threshold provided	0.0	0.10	No threshold provided
12	Pasta and noodles and like products, rice and grains	Fresh, precooked, or dried noodles and pastas and like products, rice paper, rice noodles, vermicelli made from wheat, tapioca, sago, brick paper etc. (sold as ready-to-eat)	6.4	3.0	No threshold provided	No threshold provided	0.0	0.25	No threshold provided

Food Category		Examples of food items	Codex Food Category code	Marketing prohibited if thresholds exceed values per 100 g ²¹⁰					
				Total fat (g)	Saturated fat (g)	Total sugars (g)	Added sugars (g) ¹¹	Sodium (g)	Energy (kcal) ¹²
13	Fresh and frozen meat, poultry, game, fish and seafood	Fresh and frozen meat, poultry, game, molluscs, crustaceans, echinoderms in the forms of whole pieces, cuts/fillet, comminuted/ minced/creamed. Examples: beef, pork, chicken, lamb, goat, tuna, mackerel, catfish, shrimp, ox tails, Turkey tails, mutton flap, organ meats, eggs, oily fish (e.g. herring) etc.	8.1, 8.2.3, 9.1, 9.2.1, 9.2.3	15.0	No threshold provided	No threshold provided	No threshold provided	No threshold provided	No threshold provided
14	Processed meat, poultry, game, fish and fish products								
	(a) Processed meat, poultry and game products	Non-heat and heat treated whole pieces or cuts or commuted meat, poultry and game that have been cured and dried or fermented. Examples: smoked ham, salted dried meat, salami, sausage, bacon, corned beef, smoked duck, canned meats, chicken nuggets, beef or chicken patty, pork rind, liver pate	8.2.1, 8.2.2, 8.3.1, 8.3.2	8.0	3.0	No threshold provided	No threshold provided	0.40	No threshold provided
	(b) Processed fish and seafood products	Frozen battered, cooked and/or fried, smoked, dried, fermented, and/or salted, semi-preserved by pickling or brining, fully-preserved by canning or fermentation of fish and sea foods. Examples: salted fish and seafood, brined fish, salted fish in oil, fermented fish and seafood, anchovies, shrimp paste, canned tuna, sardine, or mackerel, smoked fishes, dried shrimp, fish balls, fish finger, fish burger	9.2.2, 9.2.4, 9.3, 9.4	8.0	3.0	No threshold provided	No threshold provided	0.40	No threshold provided
15	Fresh and frozen fruits and vegetables, legumes, roots and tubers ²¹	Fruits, vegetables, mushrooms, roots and tubers, pulses and legumes, seaweed, fresh coconut	4.1.1, 4.1.2.1, 4.2.1, 4.2.2.1	Permitted					

Food Category	Examples of food items	Codex Food Category code	Marketing prohibited if thresholds exceed values per 100 g ^{9,10}					
			Total fat (g)	Saturated fat (g)	Total sugars (g)	Added sugars (g) ¹¹	Sodium (g)	Energy (kcal) ¹²
16 Processed fruits, vegetables, and legumes	Dried fruits ²² , canned or bottled, jam, jellies, marmalades, packed in vinegar, oil or brine; pickled, candied, pulp, purees, topping, fermented, fillings, cooked forms of fruits and vegetables. Examples: fruits and vegetables in vinegar, oil or brine, dried coconut, coconut cream, marmalade, jams, canned fruits, vegetables and legumes, dried mushrooms, preserved or pickled fruits and vegetables, fermented vegetables	4.1.2, 4.2.2	5.0	No threshold provided	No threshold provided	0.0	0.40	No threshold provided
17 Solid-form soybean products	Soybean-based products, soybean curd (tofu), semi-dehydrated tofu, dehydrated tofu (kori tofu), fermented soybeans (natto), other soybean protein products (soya nuggets and textured vegetable protein)	6.8.2, 6.8.3, 6.8.4, 6.8.5, 6.8.6, 6.8.7, 6.8.8, 12.9.1	8.0	No threshold provided	No threshold provided	0.0	0.10	No threshold provided
18 Sauces, dips, other seasonings and dressings	Emulsified, non-emulsified mixes as concentrated, clear sauces and like products, soybean-based seasoning and condiments. Examples: mayonnaise, salad dressing, onion dips, tomato ketchup, gravy, cheese sauce, cream sauce, bouillon cubes, seasoning powder, fermented and unfermented soy sauces, fish sauce, sweet chili sauce, spaghetti sauce, BBQ sauces,	12.6, 12.9.2	8.0	No threshold provided	No threshold provided	0.0	0.30	No threshold provided

Annex II: Illustration of comparative country approaches FOPWL regulations

Source Global: Global Health Advocacy Incubator FOPWL Regulations Around the Globe, available at <https://dfweawn6ylvgz.cloudfront.net/uploads/2023/FOPWL_Regulations.pdf> (accessed on 25th November 20

FOPL model, relevant definitions and labels' specifications										
COUNTRY POLICY ELEMENT	ARGENTINA	BRAZIL	CANADA	CHILE	COLOMBIA	ISRAEL	MEXICO	PERU	URUGUAY	VENEZUELA
FOPL model/ system	"Excess" warning labels for products that have added nutrients of concern above the thresholds, and precautionary labels when these have sweeteners &/ or caffeine. (Arts. 4 & 5, Law No. 27642)	"High in" warning labels for products that have added nutrients of concern above the thresholds. (Chapter II of RDC 429/2020, Annex XV of ANVISA Resolution Instruction No. 75)	"High in/Elevé en" warning label for most prepackaged food products containing nutrients of public health concern (saturated fat, sugars and/or sodium) at or above specified thresholds. (Table, Section B.01350, Food and Drugs Regulations)	"High in" warning labels for products that have added nutrients of concern above the thresholds. (Art. 120 bis, Decree No. 13/2015)	"Excess in" warning labels for products that have nutrients of concern above the thresholds. It includes the NOVA classification to define which products must have the seal. (Resolution No. 2492 of 2022)	"High in" warning labels for every prepackaged food that have added nutrients of concern above the thresholds (negative labelling). (Art. 4, Law No. 5778-2017)	"Excess" warning labels for products that have added nutrients of concern above the thresholds, and precautionary labels when these have sweeteners &/ or caffeine. (Arts. 4.5.3.4, NOM 051/2020)	"High in" warning labels for products that have added nutrients of concern above the thresholds, and precautionary labels that advise to reduce its consumption and avoid it in the case of saturated fat. (Art. 10, Law 30021; Decree No. 71/2017; and Art. 1, Manual for Advertising Restrictions in the Supreme Decree No. 21/2018)	"Excess" warning labels for products that have added nutrients of concern above the thresholds. (Art. 2 and annexes III & IV, Decree No. 272/2018)	"High in" warning labels for products that have added nutrients of concern above the thresholds. (Arts. 2, 4, 5 & 6, Resolution No. 1377/2021; Art. 7, Resolution No. 11/2020)
	Black octagons with white edges for each added nutrient of concern with the "excess", followed by "SATURATED FAT", "TOTAL FAT", "SODIUM", "SUGARS" or "CALORIES". In one or more separate symbols, wording and a rectangular label for sweeteners/ caffeine, both with Ministry of Health's endorsement, uppercase font and in white. Click here to see the label design. (Arts. 4 & 5, Law No. 27642; Art. 4 of Annex I and Annex II, Decree No. 151/2022)	A magnifying glass next to the phrase "high in" in a white rectangle followed by each nutrient of concern the product contains, "ADDED SUGAR", "SATURATED FAT", "SODIUM". Each nutrient will be highlighted in a separate black rectangle with the name of the nutrient in uppercase and white font. Click here to see the label design. (Art. 21 of RDC No. 429/2020, Annex XVIII of ANVISA Resolution Instruction No. 75)	A magnifying glass next to the phrase "HIGH IN" in a white rectangle followed by each nutrient of concern the product contains, "ADDED SUGAR", "SATURATED FAT", "SODIUM". Each nutrient will be highlighted in a separate black rectangle with the name of the nutrient in uppercase and white font. Below, the endorsement of Santé Canada/ "will be included. Click here to see the label design. (Section B.01351, Food and Drugs Regulations)	Black octagons with white edges with the "HIGH IN" inside, followed by "SATURATED FAT", "SODIUM", "SUGARS" or "CALORIES", in one or more separate symbols, as appropriate. Uppercase and white font, with the Ministry of Health's endorsement at the bottom of the label. Click here to see the label design. (Art. 120 bis, 4 ^o paragraph e Decree 977, as amended by decree 13/2015)	Black octagons with white edges with the "EXCESS IN" inside, followed by "SUGAR", "SATURATED FAT", "TRANS FAT", & "CONTAINS SWEETENERS", with the "MINISALUD" (Ministry of Health) endorsement in it. Click here to see the label design. (Art. 5, Law No. 2320/2021; Arts. 32.3, Decree No. 2492/2022)	A red circle with white background that states "High In" and the correspondent nutrient of concern both in writing and through an icon representing "SUGAR", "SODIUM", and/or "SATURATED FAT". Click here to see the label design. (Art. 4, Law No. 5778-2017)	Black octagon with white edges for each nutrient of concern, with the "EXCESS IN" inside, followed by "SUGAR", "SODIUM", "SUGAR", "TRANS FAT", "TRANS FAT" in uppercase white font, & a rectangular label for the warnings on avoiding consumption, located below the octagons. Click here to see the label design. (Arts. 4.5.3.4, NOM 051/2020)	Black octagon with white edges for each nutrient of concern, with the "EXCESS IN" inside, followed by "SUGAR", "SODIUM", "SUGAR", "TRANS FAT", "TRANS FAT" in uppercase white font, & a rectangular label for the warnings on avoiding consumption, located below the octagons. Click here to see the label design. (Arts. 4.5.3.4, NOM 051/2020)	Black octagon with white edges for each nutrient of concern, with the "EXCESS IN" inside, followed by "SUGAR", "SODIUM", "SUGAR", "TRANS FAT", "TRANS FAT" in uppercase white font, with the Ministry of Health's endorsement represented by the acronym "MSP". Click here to see the label design. (Annex IV, Decree No. 272/2018)	Black octagons with white edges with the "HIGH IN" inside, followed by "SATURATED SUGAR", "SODIUM" or "TRANS FAT", in one or more separate symbols, as appropriate. Uppercase and white font, with the Ministry of Health's endorsement at the bottom of the label. Click here to see the label design. (Arts. 6 & 7, Resolution No. 1377/2021, & Art. 8, Resolution No. 11/2020)

COUNTRY POLICY ELEMENT	ARGENTINA	BRAZIL	CANADA	CHILE	COLOMBIA	ISRAEL	MEXICO	PERU	URUGUAY	VENEZUELA
Label location and size in package	On the product's main side top right edge, if the shape of the product package is round or conic, in the top edge, it must be at least 5% of the front side of the product. If it has more than one label, it must be placed horizontally, one next to the other; if it is not possible, below, in the front of the product's package. Any other object/element shall not partially or totally cover it. (Arts. 2 h), 4 & 5, Law No. 27.642; Art. 4 of Annex I and Annex II Decree No. 151/2022)	In the upper part of the main panel of the package, in a single continuous surface. The size will be determined in accordance with the area of the main face of the package, increasing its size when the front of the package is bigger. The authority has provided different alternatives if it has more than one label. (Arts.3 XXV, 21, RDC No. 429/2020, Annex XVII of ANVISA Instruction 75)	FDR prescribes where and how the FOP nutrition symbol must be displayed on the label of a prepackaged product that meets or exceeds established thresholds for saturated fat, sugars and/ or sodium. The symbol must be displayed on the principal display panel (PDP) as follows: When the height of the PDP is greater than the width of the PDP, the symbol must be displayed within the upper half (50%) of the PDP. When the height of the PDP is less than the width of the PDP, the symbol must be displayed within the right half (50%) of the PDP. Furthermore, on cylinder-shaped packages, the symbol cannot appear within the left-most and right-most 10% of the principal display surface (PDS). This requirement also applies to cylinder-shaped packages on which the symbol must be displayed in the right half (50%) of	On the main panel of the product package. The size will be determined in accordance with the area of the main face of the package. The FOPL will increase according to the size of the main panel of the product's package. If it has more than one octagon, it must be placed one next to the other. The symbols must be labeled visibly, indelibly, and easily read under normal circumstances of purchase and use. The labels never have to be fully or partially covered. (Art. 120 bis 4 th paragraph e), Decree 977, as amended by Decree No. 13/2015)	On the product's upper right third of the front side or main display side (the total area of display for printing or labeling is defined as the whole label area minus the warning labels) For cylindrical and conical containers, seal should be placed on the third central upper. Size: 5% of principal area for packages of 300 cm ² . For smaller packages, sizes are proportionally reduced. If more than one label is present, they shall be placed one next to the other. (Art. 5 Law No. 2120/2021; Arts. 3.5, 32.2, Decree No. 2492/2022)	The negative symbol (for nutrients of concern) shall be at the front of the package, excluding in a unit of food where the FOP is no larger than 25 cm ² . Specifications: 1. The Symbols shall be identical in their form, including the circle, the illustrations, their letters and their bold letters, and in the size ratios between their components; 2. The diameter of the Symbols shall be calculated as follows: a. In a square package - all the area of the front of the package without the area of the joins; b. In a cylindrical or quasi-cylindrical package - 40% of the product of the height of the cylinder multiplied by the size of the cylinder; c. In a package that is not as mentioned in Sub-paragraphs (a) and (b) - 40% of the entire area of the package without the areas of the lid, the bottom, the neck and the curves in the top and bottom parts of the	On the main product's area of display, in the product's top right edge. If it is an area of display smaller than 60 cm ² , the labels can be located in any part of that area. (Arts. 3.49, 4.5.3.4.6, NOM 051/2020)	On the product's front side at the top right edge, regardless of the product's package size. It does not have to be covered by anything else. (Arts. 3 & 4, Manual for Advertising restrictions in the Supreme Decree No 21/2018)	On the product's front side, preferably on the top edge, using the dimensions established in Annex IV, Decree No. 272/2018.	On the product's front side. For cylindrical or products with other shapes, of the total of the product's label, it shall be visible, easy to read, indelible and must not be covered by anything else. (Arts. 2 () & 7, Resolution No. 1377/2021; Arts. 4, 5, 6 & 7, Resolution No. 11/2020)

Policy Scope										
COUNTRY POLICY ELEMENT	ARGENTINA	BRAZIL	CANADA	CHILE	COLOMBIA	ISRAEL	MEXICO	PERU	URUGUAY	VENEZUELA
Covered products	Any prepackaged food. The law defines “ packaged product ” as any food contained in a packaging, regardless of its origin, packaged in the absence of the customer, ready to be offered to the consumer. <i>According to the PAHO cut-off points set to the nutrients of concern for food and non-alcoholic beverages, the FOPL shall be applied for products packed in the absence of the consumer, with added sugar, fat, sodium, sweeteners and/or caffeine.</i> (Art 2 (i). Law 27.642; Arts. 2 (i), 4, 6, 8, Annex I, Decree No. 151/2022)	Foods packaged in the absence of consumers, including beverages, food additives, and technology adjuvants, including those intended exclusively for industrial processing or food services. (Art. 2, RDC No. 429)	Every prepackaged food product. (Section B.01.001, <i>Food and Drugs Resolutions</i>)	Any prepackaged food, whether it was manufactured in the country or imported. Decree No. 977/1996 defines “ food or food product ” as any substance or mixture of substances for human consumption, including beverages and all the ingredients and additives of those substances, and “ package ” is defined separately as follows: materials and structures that protect foods -in a container or not- during its storage and transportation; Containers: any recipient that holds food, covering these totally or partially; wrap: materials that protect food when sold to the public (Arts. 2 & 122, Decree No. 977/1996)	Any prepackaged food, processed or ultra-processed food, canned or packed, whether it was manufactured in the country or imported. It includes definition from the NOVA classification. Processed food definition: those elaborated in a technological process, where two or more ingredients are added, such as salt, sugar, fat, or others. These have two or more ingredients or additives, and more than 50% of the ingredients are unprocessed or barely processed food. (Art. 3.44, Decree No. 2492/2022) Ultra-processed food definition: those elaborated in a technological process, where salt, sugar, fat or other ingredients are added. These have more than 5 ingredients &/or additives and less than 50% of the ingredients are unprocessed or barely processed food. (Art. 3.45 Decree No. 2492/2022)	Every prepackaged food (food that has been packed by a manufacturer prior to it being marketed, whether or not intended for retail) that contains a high quantity of sodium, sugars or saturated fatty acids. (Art. 2, Law No. 5778-2017)	Any prepackaged food, whether it was manufactured in the country or imported. Prepackaged product definition: non-alcoholic food and beverages packaged in the absence of the consumer, being the amount of product contained in it unmodifiable, without opening the package. (Arts. 1 & 3.42, NOM 051/2020)	Any prepackaged food, whether it was manufactured in the country or imported. Processed foods and nonalcoholic beverages are defined as industrially produced foods, which are transformed from raw materials and their combination, using to that end chemical, physical or biological -or its combination- to obtain food for human consumption. (Art. 10 Law No. 3002; Art. 1 “ <i>Technical parameters of the Manual for Advertising restrictions in the Supreme Decree No. 21/2018, and art. 3.3, Supreme Decree 017-2017</i>)	Any food packaged in the absence of the consumer, manufactured in the country or imported. As a definition, the law refers to products already packed and ready to be consumed. (Art. 2, Decree No. 272/2018)	Any manufactured food product, whether it was produced in the country or imported. Manufactured products are defined as any food product which has been put under a technological or crafted process in order to transform, modify, preserve and prepare those, which are sold and distributed to people in packages approved by the Authorities), with high content of sugar, trans fat or saturated fat. The resolution aims to enhance the information of those products by creating guidelines for the FOPW labeling indicating the presence of nutrients of concern. (Arts. 1, 2, 3, d), Resolution No. 137/2021)

COUNTRY POLICY ELEMENT	ARGENTINA	BRAZIL	CANADA	CHILE	COLOMBIA	ISRAEL	MEXICO	PERU	URUGUAY	VENEZUELA
Excluded products	Regular sugar, vegetable oil, nuts and regular salt. Also, natural products without any added nutrients of concern. The cut off points are not applicable for food with specific medical purposes, vitamin supplements and baby formula up to 36 months. (Art. 7 law No.27642; Arts. 6 chart 1, 8 Annex I Decree No. 151/2022)	Natural mineral water, natural water and water added to salts; desalinated, and potable and bottled seawater. The FOPL is optional for: C) Human milk foods with the front of the packages smaller than 35 cm2; packaged food at points of sale at consumer request; and packaged food made or fractionated in the establishment where it is sold. (Arts. 2 & 18 (\$ 3º, RDC No. 429/2020)	A) Products intended solely for infants six months of age or older but less than one year of age. B) Human milk fortifiers. C) Human milk substitutes (infant formula). D) Foods represented as containing a human milk substitute. E) Formulated liquid diets (as defined in section B.24.001 of the Food and Drug Regulations). F) Meal replacements. G) Nutritional supplements. H) Foods represented for protein-restricted diets. I) Foods represented for low (naming the amino acid) diets. J) Foods represented for use in a very low energy diet as defined in section B.24.001 of the FDR. (Subsection B.01.350(15), Food and Drugs Resolutions)	Food or food mixes, which have no added sugars, honey, syrups, sodium or saturated fats; infant formulas or baby food with no added nutrients of concern; food for medical or medicinal use, food for weight loss; food for athletes (if they meet certain requirements). (Art. 110 bis 3, Decree No. 977, as amended by decree 13/2015)	A) Infant formula for children between 0 and 6 months. B) Infant formula for children between 6 and 12 months. C) Special infant formula. D) Food for Special Medical Purposes (APMES). E) Single-ingredient products that do not contain additional additives. F) Iodized and fluorized salt, and salt substitutes. G) Foods with the packaging of natural origin materials. H) Herbal and fruit infusions; tea, decaffeinated tea, instant or soluble tea, or tea extract, decaffeinated tea extract; decaffeinated coffee, instant or coffee, ground coffee, instant or soluble coffee, or coffee extract, or decaffeinated coffee extract, which do not contain added ingredients. I) Food in bulk. J) Foods used as raw material for the industry and secondary ingredients that are not sold directly to the consumer.	Fruits, vegetables, mushrooms and fresh seaweed, meat that has not undergone processing, fresh eggs in their shells, food that has been prepared in an eatery, food that has been prepared at the consumer's request at its time of sale, food that has been prepared in a catering business for the purpose of supplying it for consumption outside the place where it has been prepared, and excluding prepackaged food for retail sale; nutritious supplements; infant formulas; food that has only one ingredient -except when vitamins or minerals are added under laws requirements or has a flavor/ scent added, without changing its intrinsic nutritional value; food packages for major sale -not retailing-; some species; alcoholic beverages; salt; vegetal oils without additives; products whose packages are too small; diet soda.	Products with only one ingredient; herbs; coffee or tea -or its extracts- without any additives; fermented vinegar; water for human consumption, mineral water, and any other product excluded by the enforcement authority. (Art. 1, NOM 051/2020)	Natural food and non-alcoholic beverages; food with basic processing; food products for culinary preparation; and breastmilk substitutes. (First art. of the final provision of the Supreme Decree 017-2017)	Food with medicinal purposes in weight control diets using partial meal substitution; dietary supplements for athletes; formula for up to 36 months kids; table-top sweeteners and certain products regarding its specific compositions. (Art. 3, Decree No. 272/2018)	Food or food mixes, which do not have nutrients of concern added; un processed food or barely processed food, with packaging of natural origin materials; herbal and fruit infusions; tea, decaffeinated tea, instant or soluble tea, or tea extract, coffee, ground coffee, instant or soluble coffee, or coffee extract, or decaffeinated coffee extract, which do not contain added ingredients; food in bulk; foods used as raw material for the industry and secondary ingredients that are not sold directly to the consumer; mineral water; food for Special Medical Purposes, dietary supplements, baby formula, coffee/taurine/inositol/glucoronolactone based products, &/or plant based beverages and alcoholic beverages. (Art. 2, Resolution No. 137/2021)

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