

Perspective of federal public policy representatives on food labels

A perspectiva de representantes de políticas públicas federais sobre os rótulos de alimentos

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Abstract

Purpose: Knowing the perspective of federal public policy representatives on food labels in Brazil. **Methodology:** It is a descriptive, exploratory, qualitative approach, in which representatives of institutions responsible for the elaboration and review of regulations on general and nutritional food labeling in Brazil were interviewed in 2016. Data treatment was done through the content analysis technique. **Results:** Respondents considered food label as a right to information and highlighted advances such as the mandatory nutrition labeling. They cited obstacles that delay the regulatory process, such as the standardization process of the legislation with Mercosur countries, excessively technical information and conflicts of interest, including the lobbying of industries. Among the challenges, there was the need to establish a closer relationship between nutrients and ingredients, and the adoption of a frontal nutrition labeling model, in order to make nutrition information available in a clear and concise manner. **Conclusions:** These results may support professionals who act directly or indirectly with consumers in the elaboration of strategies to help them choose food through nutritional labeling and ingredient lists, in order to promote health and improve the quality of life.

Keywords: Food Labeling. Health Surveillance. Health Promotion. Healthy Eating.

Resumo

Objetivo: Conhecer a perspectiva dos representantes de políticas públicas federais sobre os rótulos de alimentos no Brasil. **Metodologia:** Trata-se de pesquisa descritiva, exploratória, de abordagem qualitativa, na qual foram entrevistados, em 2016, representantes de instituições responsáveis pela elaboração e revisão das regulamentações sobre rotulagem geral e nutricional de alimentos no Brasil. O tratamento dos dados foi realizado por meio da técnica de análise de conteúdo. **Resultados:** Os entrevistados consideraram o rótulo de alimentos como direito à informação e salientaram avanços como a obrigatoriedade da rotulagem nutricional. Citaram entraves que tornam o processo regulatório moroso, como o trâmite de padronização da legislação junto aos países do Mercosul, informações excessivamente técnicas e os conflitos de interesses, incluindo o *lobby* das indústrias. Entre os desafios, foi salientada a necessidade de estabelecer uma relação mais próxima entre nutrientes e ingredientes e a adoção de um modelo de rotulagem nutricional frontal para disponibilizar a informação nutricional de forma clara e resumida. **Conclusões:** Estes resultados poderão subsidiar os profissionais que atuam direta ou indiretamente com os consumidores na elaboração de estratégias que os auxiliem na escolha alimentar por meio da rotulagem nutricional e lista de ingredientes, com vistas à promoção da saúde e à melhoria da qualidade de vida.

Palavras-chave: Rotulagem de Alimentos. Vigilância Sanitária. Promoção da Saúde. Alimentação Saudável.

Introduction

Facing obesity and other related chronic non-communicable diseases (NCD's) has generated the need to promote actions among various sectors and institutions, associated with the review and reformulation of regulatory measures on food labeling.¹

Food labeling, especially nutritional labeling, can strengthen and broaden the autonomy of individuals to make healthy and conscious food choices, since it represents an instrument capable of providing knowledge and behavior changes. This instrument is pointed out as one of the political strategies for the prevention of obesity and other NCDs.²

Among the priority regulatory policies and actions encouraged to promote healthy eating, there are sugar, salt, and fat reduction, and the adoption of normative measures to encourage the reformulation of processed foods, among others. This implies an improvement in the availability

and access to healthy food, and encourages the implementation of restrictive legislative measures on food marketing, as well as the improvement of labeling standards, including nutritional values on the front face of the packaging, in order to facilitate the access to information.^{1,3}

A systematic review of literature evaluated the progress of salt reduction strategies adopted by several countries in order to achieve the overall goal of a 30% reduction of this nutrient by 2025. It has been observed that 75 countries have a national strategy for reducing salt, especially through the education of consumers, followed by the reformulation of food processing and taxation on food with high salt content. The adoption of regulatory actions through legislation and information about sodium in food packaging was also pointed out, among others.⁴

The ingredient list, followed by the nutritional information on food labels, is one of the tools which help making choices that lead to health promotion and food safety. Labels, when making this information available, can be understood as an important communication tool that cooperates with the decision-making autonomy of citizens. When prepared effectively and consciously, with a less technical language and a proper readability, labels can be increasingly demanded as a mechanism for promoting health in the field of Public Health.²

The Política Nacional de Alimentação e Nutrição (National Food and Nutrition Policy - PNAN) emphasizes that promoting healthy eating involves food and nutrition education initiatives associated with food regulation strategies, including nutrition labeling and other information. The access to information strengthens the analysis and decision-making capacity of consumers, and this is one of the reasons why the information displayed on food labels should be legible, clear, precise and easy to understand.⁵

One of the measures to reduce risks and promote the health of citizens is promoting educational actions, which may include the information provided on food labels. Even with the normative advance that establishes the obligation of nutritional labeling, it is still possible to find food labels with excessively technical and advertising information, which may lead to misinterpretations, as opposed to the provisions of the Código de Defesa do Consumidor (Consumer Protection Code).^{6,7}

Studies have shown that, among Brazilians, there are high percentages of consumers claiming that they read food labels; the most consulted information is the expiration date.^{8,9} However, it is possible to observe that these consumers still have little knowledge about nutritional information, which makes it difficult to choose healthy food.⁹

Despite the various conflicts of interests in the food area, Brazil has been searching for ways recommended by the World Health Organization (WHO) to improve food labels, as proven by the review of the technical regulations on general and nutritional labeling,¹⁰ by the NCDs action

plan 2011-2022,¹¹ and by the voluntary agreements with the industrial sector,¹² by the food and nutrition education benchmark for public policies^{1,3} and by the Guia Alimentar para População Brasileira (Food Guide for the Brazilian Population),¹⁴ among other actions.

It is hoped that the knowledge about the point of view of the actors responsible for the elaboration and review of the federal food labeling regulations may help professionals, acting directly or indirectly with the consumer, to provide empowerment strategies to help them in the process of choosing food, resulting in an improved health and quality of life.

This study aimed at knowing the perspective of representatives of the federal public policies on food labeling in Brazil.

Method

Ethical considerations

The research project was approved by the Comitê de Ética em Pesquisa com Seres Humanos of the Universidade de Franca and registered under Normative Act n. 1.220.919/2015 and CAAE: 452.19715.0.0000.5495.

Type of study

It is a descriptive-exploratory type of research, with a qualitative approach, appropriate to the questions proposed in the study. It allowed a deepening in the universe of the meanings of human actions and relations that are neither perceptible nor perceivable in equations, averages and statistics.¹⁵

Scenario and participants

The social actors who are part of the institutions responsible for drafting, reviewing and approving the regulation of public food policies in Brazil participated in the interviews. Representatives of the federal public sector were interviewed, including regulatory agencies - the Agência Nacional de Vigilância Sanitária (National Health Surveillance Agency - Anvisa), the Ministério da Agricultura Pecuária e Abastecimento (Ministry of Agriculture, Livestock, and Supply - Map), the Coordenação Geral de Alimentação e Nutrição (General Food and Nutrition Coordination) - and two federal deputies.

From the organized civil society, representatives of the Instituto Brasileiro de Defesa do Consumidor (Brazilian Institute for Consumer Protection - Idec), the Conselho Nacional de Segurança Alimentar e Nutricional (National Council for Food and Nutrition Security), the Associação Brasileira de Saúde Coletiva (Brazilian Association of Collective Health), the Conselho Federal dos Nutricionistas (Federal Council of Dietitians) and one of the managers of the site *Fechando o Zíper* (currently called *Desrotulando*) were interviewed. From the industrial sector, representatives of the Associação Brasileira das Indústrias da Alimentação (Brazilian Association of Food Industries) and the Instituto de Tecnologia de Alimentos (Institute of Food Technology - Ital) were interviewed.

As for the academics, representatives of the Núcleo de Pesquisas Epidemiológicas em Nutrição e Saúde (Center for Epidemiological Research in Nutrition and Health) of the Universidade de São Paulo, the Laboratório de Ensino e Pesquisa em Alimentação e Nutrição (Laboratory of Education and Research in Food and Nutrition) of the Escola Nacional de Saúde Pública da Fundação Oswaldo Cruz and the Núcleo de Pesquisa de Nutrição em Produção de Refeições (Research Center for Nutrition in Meal Production - Nuppre) of the Universidade Federal de Santa Catarina (UFSC) were interviewed. In order to select the respondents, the institutions participating in the review of the National Food and Nutrition Policy were evaluated.

Among the selection criteria, there were: the role of institutions in supporting healthy eating and in the fight for improvements in food labels; the respondents should be social representatives of the public sector (including the regulatory sector), of the organized civil society, of the industrial sector, or academics. The last criterion was the viability of geographical access, having chosen the three cities where most representatives were concentrated (Brasília, São Paulo and Rio de Janeiro).

From the initial interviews, new participants were indicated and then the snowball sampling technique was used.¹⁶ Among the suggestions presented by the respondents, three of them stood out; Campinas - São Paulo, Florianópolis - Santa Catarina and Porto Alegre - Rio Grande do Sul, corresponding respectively to Ital, Nuppre and one of the responsible for the site *Desrotulando*.

Data collection procedures

Research data were obtained through the use of two collection techniques: semi-structured interviews and documentary analyses. The semi-structured interview script was created from four axes, which dealt with the following themes: Food labeling legislation and consumer law; Obstacles and improvements in labels and nutritional quality of food; Labels and nutritional quality of food in the policy scenario; and Initiatives about Food Labeling and Healthy Eating.

Participants were responsible for the location, day and time of the interview; six interviews were conducted in person and nine through Skype. All of them were recorded in MP3 audio, lasting one hour on an average and performed after signing a Free Informed Consent Form. Face-to-face interviews took place in a private room, so that participants felt comfortable and confident to verbalize their perspective on food labels. The interviews were collected from September 2015 to February 2016, totaling 15 testimonials.

As for the documentary analysis, a semi-structured script was used, based on the themes included in the interview script. This made it possible to select eight records from a total of 17 that were analyzed; three from the General Labeling Review Working Group (GTRRG) and five from the Nutrition Labeling Review Working Group (GTRRN). Memoranda of meetings that were restricted to representatives of Anvisa, Map, the industrial sector and the Ministry of Justice were excluded, and the memories containing representatives of the four sectors (public, including the regulatory sector; civil society; industrial and academics) were kept. The Gerência Geral de Alimentos (General Food Office - Ggali)/Anvisa, the body responsible for transferring the documents, was asked for the permission to publish the data presented in the meetings' memorials, which was granted by e-mail.

Data organization and analysis

The collected material was organized into thematic categories and subcategories and was analyzed based on the content analysis framework.¹⁵ Initially, the interviews were transcribed and the recordings were examined carefully. From a second reading, cuts were made in the interviews. Fragments of the interviews containing definitions emerged from the statements that responded to the purposes of the study were grouped into categories and subcategories. At the end of the interview ordering process, memoranda from the meetings were read and analyzed with the same care. The results obtained in the research allowed data triangulation, which contributed to converging evidences and helped reinforcing the validity of the data presented in the study. In order to discuss the obtained content, a bibliographic reference was used, providing the theoretical basis and helping in the process of understanding and interpreting the studied object.

Results

The category "Food labels: the right to information" and the subcategories "Advances", "Obstacles" and "Challenges" emerged from the study.

Category - Food labels: the right to information

According to the participants, information on food labels is a right and should assist consumers in making their choices, not only in relation to nutritional values, but also in terms of composition, origin, storage method, and data about the manufacturer, among others:

[...] food labels are vital to ensure the right to information for the consumer ... It is a right provided for by [...] the Consumer Defense Code [...] so that people may know the composition, origin, quality of food in a clear and precise way, and thus making decisions about which food they want to consume or not [...] (Participant n. 11).

[...] food labels [...] are the ID of a product. They enable consumers to make a choice ... not only in relation to the nutritional characteristics of food, but also in relation to the company that produced it, the products used for that product, etc.. [...] (Participant n. 12).

[...] food labels inform consumers about the content of products, and if the information is well grounded, it guides the choices of consumers (Participant n. 14).

Subcategory 1 - Advances

Compulsory nutritional labeling was considered by participants as an advance. With this, it was possible to discuss themes such as, for example, the information related to transgenic food and trans fat, the regulation of allergens and infant products, among others:

[...] the great advance in food labeling was the obligation of nutritional labeling [...] not only by standardizing it in Brazil, but also by having it in terms of regional market, which was a great gain. [...] another example of marked progress is the mandatory use of the transgenic symbol and the declaration of allergens in food labels, which started from a demand by the society [...] (Participant n. 8).

[...] nutritional information was an important achievement; however limited it may be, and in spite of problems. It is a milestone, in terms of starting to create a view stating that the composition of food is actually a risk factor. [...] it needs to be monitored, controlled and regulated. (Participant n. 12).

Subcategory 2: Obstacles

When describing the factors that limit nutritional labeling in serving as an information tool while searching for healthy eating habits, participants emphasized the way in which information is available on labels, the delays in harmonizing norms in Mercosur and the conflicts of interests, including those of the food industry lobbies:

[...] I stress the technical issues that are not transformed into a language that consumers can understand (Participant n. 2).

[...] we have to take care of excessive information on labels [...] in order to not to overload them. [...] information on food labels must be easy for consumers to see, so they are not misled (Participant n. 7).

[...] today, there is so much information in such small fonts that it is hard to read (Participant n. 6).

[...] citizens lack information from a graphic point of view, and also in relation to the way information ends up being conveyed on the food label. [...] the way information is arranged, does not help reading or understanding (Participant n. 9).

[...] the mandatory nutrition labeling information is very technical. They do not think about consumers, who are the target audience. [...] the focus on the needs of industry, regulatory bodies, but consumers, when reading food labels, cannot process the information properly (Participant n. 10).

[...] you have to write the information on labels as clearly as possible [...] in a simple way so that consumers look and understand [...] (Participant n. 15).

The size of letters and the overly technical nature of the information on food labels were highlighted in the memoranda of the Working Group (WG) meeting, as a complaint by consumers (GTRRN - 12/03/2014).

Respondents pointed out that, in some cases, labeling food by servings can cause misunderstandings. Although the label states, for example, that a certain item is not in a serving, it should be considered that consumers, in most cases, do not eat only one but several servings.

[...] I am in favor of having information per package. [...] how much trans fat there is in the package [...] and not restricted to the serving. Because servings [...] can often be misleading [...] (Participant n. 4).

In the meeting's memoranda, the WG proposed to maintain information per serving, but to report the number of servings contained in the package and to require the information per package, per serving and per 100g or 100ml (GTRRN - 12/03 and 04/2015).

Another obstacle mentioned by participants was the slow pace of the harmonization with Mercosur:

[...] it is not that it is bad to harmonize with Mercosur, what is bad is the process [...] the question is not technical, we know that we need information on labels ... the question is political, organizational (Participant n. 14).

[...] there are conflicts over nutritional labeling, and these conflicts are holding back the advances, or sometimes these conflicts are so great that they lead to setbacks [...] The current debate on the use of the GMO symbol on labels is an expression of this; increasingly, in the Congress, there is the participation of groups with economic interests (Participant n. 1).

[...] there is still the strong issue of the industry lobby. [...] they invest heavily in lobbying against regulatory measures [...] (Participant n. 13).

The issue of the slow process in Mercosur was also highlighted in the memoranda of the WG meeting. It was pointed out that this delay caused Anvisa to choose unilateral regulations of the requirements for the mandatory labeling of the main food that cause food allergies, while the issue is not harmonized in the Mercosur economic block (GTRRG - 02/25/2015).

Subcategory 3: Challenges

As emphasized by the participants, a closer relationship is needed between nutrients and ingredients that are currently addressed by different legislations:

[...] there is certain nutrition labeling information that, so to verify if they are correct, it is necessary to use an ingredient list. However, since the information is approached in different legislations, and it is considered as distinct items on the label, it cannot always be evaluated as one [...]. All additives should have a single name. What you see is the same additive with several names that mean the same thing (Participant n. 3).

[...] I think it would be good to search for a way to look at food labels as a whole, not in parts, as it is today; it would be a possibility to improve a little and avoid contradictions [...] (Participant n. 11).

In the memoranda of the meetings, the UFSC representative stressed that it makes no sense to separate the ingredient list from the nutritional information. The WG concluded that nutrition labels are unattractive, difficult to read and have a complex content, difficult to understand. It was emphasized that the inclusion of the quantitative declaration of ingredients would help a correct understanding of the nutritional quality of food, and a more conscious choice of food by consumers (GTRRN - 12/03/2014 and 12/03 and 04/2015).

According to the participants' perspective, it is necessary to summarize the nutritional information through images, figures, symbols and others. Adopting a frontal nutrition labeling model with summarized messages was defended by most respondents, in order to provide consumers with greater agility in identifying the composition of products:

[...] the problem with nutritional information is that several countries adopt different models, and some models translate the negative aspects of food such as high amounts of sodium and sugar into a warning to the population. Other models try to translate the nutritional composition in the form of traffic lights, which show the percentages [...] Brazil has to evaluate all the models to choose its own [...] (Participant n. 8).

In the memoranda of the WG meeting, the representative of Anvisa stressed that the adoption of a frontal nutrition labeling model is related to the understanding of food labels by consumers, which is in turn associated with cultural and behavioral factors, such as level of education, level of knowledge about nutrition and eating habits (GTRRN - 05/13/2015).

The respondents highlighted the need for improvements in the decoding and readability of the mandatory information on the labels. They emphasized that, unlike advertisements, the visual presentation of the mandatory information is unattractive and poorly localized:

[...] the disproportion between the mandatory information on the label, with advertising [...]. The mandatory information must be at least one millimeter. However, one millimeter [...] depending on the label material, the color of the background, the color and the type of the font, whether it is closer together or more separated, or if it is on top of the packaging solder, is difficult to read [...] (Participant n. 6).

[...] the mandatory information, which is the most important for the consumer, is written in the smallest letters, [...] the most important information for the industry is written in the larger letters [...] (Participant n. 5).

Supporting the comments of the respondents, it is reported in the WG meeting memoranda that, in industrialized food packages, the most visible areas (e.g. the main panel) are generally reserved for promotional information, while mandatory information with details on the composition of the product are declared in areas with lower visibility (e.g. the back panel) (GTRRN - 12/03 and 04/2015).

Discussion

Nutritional labeling with the purpose of strengthening the decision-making autonomy of consumers on healthy food choices is present in Brazilian health policies. The first edition of the Política Nacional de Promoção da Saúde (National Health Promotion Policy - PNPS), published in 2006, incorporated healthy food into its specific action scope, since it is one of the prerequisites for health.¹⁷ The PNPS presented as one of the strategies to act in the field of healthy eating the fact of encouraging consumers' understanding and empowerment through the practical use of nutrition labeling.¹⁷

The PNPS, which was redefined in 2014, maintained healthy food among its priority themes and presents the need for a closer relationship between public policies, including the PNAN, which also indicates nutritional labeling among the strategies for health promotion.¹⁸ One of the reasons for the incentive to keep addressing issues involved with healthy eating among the priorities in

public health policies is justified by data from the Vigitel 2016 telephone survey - Vigilância de Fatores de Risco e Proteção para Doenças Crônicas por Inquérito Telefônico (Surveillance of Risk Factors and Protection for Chronic Diseases by Telephone Inquiry) - which shows a high frequency of overweight among the adult population, as well as related comorbidities, such as diabetes and hypertension, in the last ten years.¹⁹

Despite the importance of food labels, a survey that assessed consumers' confidence in the information provided on labels showed that they were relatively low. Only 19.5% out of the 400 consumers reported trusting the information completely, whereas 54.3% said that they were partially confident and 24% did not trust it. According to these consumers, sanitary authorities do not inspect food labels, and the information is manipulated by manufacturers, being often the subject of marketing strategies.²⁰

A study conducted in Pelotas, Rio Grande do Sul, ratified consumers' distrust regarding the supply of unreliable information on food labels. After laboratory analyses to evaluate the nutritional composition of *bisnaguinha*-type bread, destined to the infantile public, the results were compared with the nutritional information on the label of this product, verifying that in the six evaluated brands, all exhibited irregularities. It was emphasized that it is important for food industries to offer consumers true information, whereas the supervisory bodies allow the use of nutritional tables with errors, due to the lack of standardization of laboratory control methods.²¹

Mandatory nutritional labeling in Brazil occurred more than a decade ago, and in the last five years, among the regulatory milestones, it is possible to mention the mandatory declaration of allergenic foods on labels - Resolution RDC N. 26/2015. Allergen labeling was approved regardless of the harmonization in Mercosur, due to the demand for social demonstrations and the mobilization by parents who had difficulties in defining foods to offer to children with food allergies. In spite of the pressure from the industrial sector, the resolution established the mandatory declaration on the labels of 17 foods that cause allergies. The publication of the DRC is a confirmation of the importance of popular protests to assert their rights.^{22,23}

Despite mandatory nutrition labeling, literature on the subject shows that the percentage of consumers who do not understand it is still high. A study showed that 70% of consumers reported knowing the technical terms that often appear on food labels (gluten, omega 3, trans fat, diet, light), but they did not know what they meant, especially consumers older than 45.²⁴ This is worrying, since the National Health Survey has shown that rates of overweight, obesity and NCDs begin to rise from approximately the age of 30.²⁵ Not knowing technical terms may lead to increased health risks, since healthier and more discerning food choices require reading and understanding the meaning of the information on labels, in particular the one referring to nutrition labeling and ingredient list.²⁴

As for the serving declaration on labels, participants pointed out that in some cases it may cause misunderstandings, especially regarding the availability of information about trans fat. The Brazilian legislation considers that food “does not contain trans fat” when it presents amounts equal to or less than 0.2 g of trans fat per serving. Thus, when the minimum limit of trans fat per serving is not reached, the industry is not obliged to declare this amount on the label. The situation becomes more worrisome when the consumer has the habit of ingesting several servings of the food, because they might be consuming significant amounts of trans fat. It would be ideal to specify the component percentages of the ingredient list.²⁶

The harmonization of legislation in Mercosur comprises a dilemma which is also considered a conflict of interest. On one hand, economic interests with the purpose of minimizing trade barriers, favoring the free trade of products among Mercosur member countries; on the other hand, a population at the mercy of a time-consuming system that prevents measures from being adopted with improvements that affect positively their health. This reinforces that, in the light of economic interests, the citizen-consumer plays a peripheral role in this system.²⁷

Health promotion strategies emphasize inter-sector actions and the establishment of multi-sector partnerships to address the obesity epidemic, the high prevalence of NCDs and their risk factors, the excessive use of pesticides, the high consumption of processed and ultraprocessed foods, among others.⁸ Partnerships to achieve these goals should encompass governments and private sectors, considering products, goals, mission, and political values that underlie the principles of each institution, so as to remain symmetrical to the principles of public policies.²⁸

In the communication process between labels and consumers, there is space sharing between advertising messages and mandatory information, with different strengths of intensity, where advertising information is privileged rather than mandatory information. Thus, the nutritional information and the transgenic symbol, for example, may be present according to the legislation, but they will have different emphasis on labels, depending on the interests of the manufacturer.²⁹ To illustrate the setbacks that deprive consumers of their rights, it is worth mentioning the approval of Draft Bill N. 34/2015, voted on September 19th, 2017, which shows that it is unnecessary to have the “T” symbol on the packaging of transgenic foods, as opposed to the opinion of most consumers, who have protested on the portal of the Federal Senate.³⁰

In a systematic review that analyzed 38 studies, it was found that consumers interpret nutritional information more easily when colors and symbols are incorporated into texts with summary information, than when there are only numerical information and guidelines of daily values expressed as percentage and/or grams. It was emphasized that labeling models can influence consumers to buy healthier products.³¹

A research with 125 participants showed that the use of frontal nutrition labeling improves consumers' access to nutritional information, compared to the traditional nutritional table. This advantage of front labeling is attributed to both the information display location (main panel) and to design elements. Researchers reported that these findings may be relevant to guide political decisions on labeling standards.³²

A study that evaluated 4,539 food labels showed how added sugars are reported on the ingredient list of industrialized food sold in Brazil. It was found that 70% of the labels had added sugars or ingredients that could contain them; 262 different nomenclatures to designate them were identified.³³ The fact that information on the sugar content in nutrition labeling is not mandatory in Brazil is worrisome from an epidemiological point of view regarding dental caries, obesity, diabetes, among others.³⁴

The other point discussed in the meeting's memoranda was the inconsistency between the information on the ingredient list and the nutritional table about the trans fat declaration. This issue was corroborated in a study conducted in Brazil, showing that out of the 2,327 analyzed food labels, 50.5% mentioned in their ingredient list the trans fat component. However, only 18.1% reported in the nutritional information some trans fat content and 22.2% stated "it does not contain trans fat".²⁶

Advancing and overcoming the challenges of improving food labels require the involvement of regulatory bodies with the active participation of consumers, in order to improve and invest in information, communication and education strategies that may guide consumers on the goals and importance of using labels, in particular about nutrition labeling, to promote healthy food choices.²⁷

Contributions of the study

The perspective of federal public policy representatives involved in the issue of nutrition labeling identified in this study may support professionals that work directly or indirectly with consumers to develop strategies to assist them in the food choice process through food labeling, thus improving health and life quality. The produced evidences point out the need to encourage, within the scope of social media, units of primary health care, schools, nurseries and other social facilities, the use of food labels by consumers in choosing a healthy diet. This could contribute to the promotion and protection of health, to the exercise of consumer rights and to the confrontation of obesity and other NCDs.

Limitations

Among the limitations of the research, which can also be evaluated as a cutoff of the purpose, there is the fact that only representatives of the policies responsible for the elaboration and review of federal food standards were heard. Knowing the perspective of those involved at the three action levels (municipal, state and federal), as well as consumers' perspective, would further enrich results. Moreover, as all qualitative work, the results of this research cannot be generalized, considering the specificity of the studied group, which was contextualized in a given reality.

Conclusions

The qualitative approach that grounded the study made it possible to analyze the perspective of representatives from the public sector (including regulatory agencies) and industrial sector, representatives of the organized civil society and academics about the advances, obstacles and challenges of food labeling in Brazil.

Advances such as mandatory labeling, use of the GMO symbol and the declaration of allergen in food labels were highlighted, but obstacles that make the regulatory process time-consuming, such as the standardization process of the legislation with the Mercosur countries and conflicts of interest have been emphasized, as well as the allegation that the information on labels is overly technical, excessive and written in small fonts. Among the challenges, it was possible to highlight the need to establish a closer relationship between nutrients and ingredients, the decoding and readability of the information and the adoption of the frontal labeling to make nutrition information available.

It is suggested to conduct new qualitative researches on the food labeling theme, in order to propose improvements and advances in public policies within the area of food and health. Granting investments in researches that support the regulatory ground based on national scientific studies can be an excellent strategy to overcome the challenges that involve food labeling in Brazil.

Contributors

MCS Pereira, MCP Jesus, HS Vassimon and MFL Tavares contributed to all stages of the study: concept, design, writing and critical review.

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