

Big Food's War on Healthy Food Policies Executive Summary

Front-of-package labeling (FOPL) regulations represent a key public health measure to promote healthier food environments and address noncommunicable diseases (NCDs). Among existing FOPL systems, warning labels have proven effective in changing consumer behavior toward healthier decisions. Warning labels help consumers quickly and easily identify ultra-processed food and beverage products (hereinafter to be referred to as UPP)¹ high in sugar, sodium, and fat. These highly processed foods and beverages contain multiple additives, poor nutritional value, and have a significant impact on environmental and human health.

The COVID-19 pandemic has accentuated the urgency to implement evidence-based public health policies and regulations to reduce the burden of NCDs, including FOPL systems. Even though there has been a growing global momentum around FOPL, in which more than 30 countries have adopted this policy, the private sector has tried to block and water down these initiatives over the years. Therefore, advocates and civil society organizations (CSOs) must work arduously to confront the UPP industry² tactics aimed at undermining adequate food and nutrition measures in order to increase profits.

Recently, the UPP industry has shifted its stance from outright opposing FOPL to seeking to weaken the policy standards and requirements. Where governments have approved FOPL, industry is attempting to delay implementation and avoid compliance through multiple tactics. In 2021, the Global Health Advocacy Incubator (GHA) monitored UPP industry attempts to weaken FOPL standards in 20 geographies; this report highlights different actions and narratives by the industry. Collectively, these schemes indicate a broader global strategy used by the UPP industry to protect its business goals. Though these tactics were adapted for different local contexts, they follow an orchestrated playbook.

The corporate playbook is composed of five main strategies:

- 1. Protect the UPP industry's reputation and brands through corporate washing;**
- 2. Influence policies through multilateral bodies to delay implementation and threaten countries with legal and economic concerns;**
- 3. Divert attention from its corporate responsibility on the damage to environmental and human health to blame individuals for their behaviors;**
- 4. Imply that their products contribute to health, the environment, and society while blocking the development and implementation of healthy food policies; and**
- 5. Seek loopholes in regulations to continue promoting ultra-processed products.**

This report provides recommendations for advocates and CSOs who are confronting the UPP industry's deliberately misleading and unfaithful practices. By exposing, systematizing, and analyzing different tactics and industry trends, GHA seeks to contribute to the development of strategic and innovative approaches that help prevent, mitigate, and face industry interference in healthy food policies.

¹ Ultra-processed foods and beverages are industrially manufactured formulations of food substances, typically containing nutrients of concern, such as sugar, sodium, and fat, ["little to no whole foods, always contain edible substances not used in home kitchens and/or additives"](#). ["These products are notoriously cheap, yield high profit margins, and are ubiquitously marketed globally, with few restrictions."](#)

² *UPP industry* refers to the conglomerate of major transnational corporations that widely manufacture and distribute UPP across the globe. This term also comprises indirect business allies, national, regional, and transnational trade associations, front groups, academic experts, individual spokespeople or institutes with industry ties, and local "grassroots" groups that in many cases serve as platforms to advance private interests, putting the common good at risk. Most of these allies hide their affiliations to industry interests, and their main goal is to pass as independent groups. The "UPP industry" concept is used interchangeably with these connotations throughout the report.