

***Front-of-package labelling (FOP): a collaborative regional study
with countries members of the Common Southern Market
(MERCOSUR)***

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* This final report only reflects the Brazilian activities, outputs and outcomes of the project.

Abstract

The increased production, availability, marketing and consumption of ultra-processed food and drink products (UPPs) have profoundly changed food systems and are leading causes of the current pandemics of obesity and non-communicable diseases (NCDs). To improve eating habits of the population it is needed to make profound changes in food environments, such as the improvement of food labelling for clearer and more comprehensible nutritional information. Front-of-package warning labelling have been recommended as the most effective measure to understand nutritional information and help consumers to make more conscious and healthier food choices. The regulatory process of food labelling in Brazil and Argentina depends on harmonization as part of the Southern Common Market (MERCOSUR) trade agreements, which is considered as an obstacle for the in-country improvements. Latin America is the region that is leading the best approaches for nutrition labelling regulatory process, as the front-of-package warning labelling is being adopted by several countries, led by Chile. This research project aimed to provide evidence in order to promote effective mandatory front-of-package labelling (FOPL) systems in Brazil and Argentina and to support policy discussions in the rest of MERCOSUR countries. With the evidence produced, we got to understand the regulatory scenario in Brazil, Argentina and in MERCOSUR, to be prepared for a possible judicialization of the regulatory process in the National Health Surveillance Agency (Anvisa), and to map the arguments and strategies used by representatives of the food industry to hinder and delay the process against the implementation of front-of-package warning labels in the country. The results and outputs of this project were used for advocacy and communication strategies to push forward for the best regulatory option of food nutrition label in Brazil. The project has contributed for the improvement of regional collaboration between researchers and members from the civil society in the region, and to remove the barriers regarding the MERCOSUR harmonization process. For future projects, we plan to continue to work on the nutrition labelling policy, since it is not implemented yet, as well as extend the work with the Latin American region to advance with this food policy in different countries.

Keywords: Food environment, food system, healthy eating, front-of-package labelling, warning labels, MERCOSUR.

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1. The research problem

The burden of non-communicable diseases (NCDs) in Brazil remains as one of the major causes of mortality and morbidity. The last Brazilian data on the prevalence of excessive weight and obesity from the Surveillance System for Risk and Protective Factors for NCDs through Telephone Interview (*Sistema de Vigilância de Fatores de Risco e Proteção para Doenças Crônicas por Inquérito Telefônico – Vigitel 2018*) points out that the rates are still high – 55.7% and 19.8% of Brazilian adults have excessive weight and obesity, respectively. From 2006 to 2018, the frequency of excessive weight and obese adults increased 13.1% and 8.0%, respectively. The mean annual variation of these indicators was 1.11 and 0.65 for excessive weight and obesity, respectively. NCDs related to excessive weight, such as diabetes, hypertension, cancer and cardiovascular diseases, are affecting more and more people of all age groups. In 2018, the diagnosis of hypertension and diabetes reached 24.7% and 7.7% of the Brazilian adults, respectively. In the case of diabetes, from 2011 to 2017, there was an increase of 0.21%/year (BRASIL, 2019).

Despite the scenario of increasing prevalence of NCDs, the number of evidences associating the excessive consumption of ultra-processed food products (UPPs) with different negative effects in health is growing. Among the studies that evaluated the impact of UPPs in the nutritional quality of diets, a randomized controlled trial investigated if UPPs affect energy intake in normal weight adults. It was found that energy intake was greater with the UPPs diet, with increased consumption of carbohydrates, besides the weight gain with the consumption of the UPPs diet and weight loss with the unprocessed diet (HALL *et al.*, 2019). In Brazil, the publication of studies that show the negative impact of UPPs in the diet quality has been consolidated. A national representative study showed that the consumption of UPPs was directly associated with high consumption of free sugars and total, saturated and trans fats, and with low consumption of protein, dietary fiber, and most of the assessed vitamins and minerals (LOUZADA *et al.*, 2018). Data from 2015 (LOUZADA *et al.*, 2015) and 2019 (CANHADA *et al.*, 2019) supported the relationship between the consumption of UPPs and excessive weight in Brazil.

Consuming UPPs is not only a matter of personal choice and responsibility; it is shaped by the environment in which people live. These kinds of foods are widely available in different locations (from gas stations to hospitals), are cheaply produced and sold, are highly publicized as an easy option that do not need preparation and can be consumed everywhere at any time. Therefore, the food environment, including food access, prices, information and marketing, needs to be regulated by public policies and actions in order to promote the consumption of unprocessed or minimally processed foods and discourage the consumption of UPPs (HENNIS & GOMES, 2018; MONTEIRO *et al.*, 2018).

To do so, the World Health Organization (WHO) and the Pan American Health Organization (PAHO) recommend the implementation of front-of-package labelling (FOPL) to improve the nutrition

information of foods products and, consequently, enhancing consumers' food choices to prevent the rise of NCDs epidemic (PAHO, 2014; WHO, 2016). Among the models implemented all over the world, the warning labels have the greatest potential to promote healthy diets, which is the one used in Chile, Israel, Peru, Uruguay and Mexico (where it was recently approved). This model is easier to interpret, target noncore products, and discourage their purchases and consumption (KHANDPUR, SWINBURN & MONTEIRO, 2018).

Among the Southern Common Market (*Mercado Común del Sur* - MERCOSUR), Uruguay is the only country that implemented a FOPL in 2018 by a decree, based on warning labels (URUGUAY, 2018). The decree includes the obligation of changing the FOPL according to a future and different MERCOSUR's decision on this issue. However, in March 11th, 2020, the national government issued a decree suspending for 120 days the FOPL decree that was supposed to enter in force in March 1st, 2020. This new decree creates a governmental commission that will be in charge of assessing harmonization with MERCOSUR legal framework (SPUTNIK, 2020).

This fact reflects that MERCOSUR's main policy barrier is the prioritization of trade and economic over public health interests. This project aimed at documenting that each member state of MERCOSUR is autonomous and eligible to promote a national FOPL that best protects the right to health of its population. Because Argentina and Brazil are both members of MERCOSUR, we worked to better understand this process and develop sound evidence to promote an effective FOPL system in each country.

In Brazil, the National Health Surveillance Agency (*Agência Nacional de Vigilância Sanitária* – Anvisa) is responsible for regulation food labelling. So, in 2014, a Working Group (WG) was created to discuss the issue of the current nutrition labelling in the country (which includes the nutrition facts panel and the complementary nutrition information – claims) and possible solutions, with the participation of civil society, academia, government and food industry representatives. In the middle of 2017, participants of the WG sent proposals for the improvements of the food labelling to Anvisa. Idec, together with information design specialists from the Federal University of Paraná (UFPR), proposed a FOPL model based on the one implemented in Chile in 2016, in a black triangle format, using the PAHO nutrient profile model (PAHO, 2016). Also, Idec sent to Anvisa the research that proved the efficacy of the triangles in the Brazilian context and population, developed together with researchers from the Center for Epidemiological Research in Nutrition and Health/University of São Paulo (*Núcleo de Pesquisas Epidemiológicas em Nutrição e Saúde/Universidade de São Paulo* - Nupens/USP) (KHANDPUR *et al.*, 2018; KHANDPUR *et al.*, 2019; SATO *et al.*, 2019).

In December 2017, Anvisa officially opened the regulatory process on nutrition labelling. Between May and July 2018, Anvisa opened a technical public consultation (*Tomada Pública de Subsídios* – TPS) based on the Preliminary Report on Regulatory Impact Analysis on Nutrition Labelling (*Relatório Preliminar de Análise de Impacto Regulatório sobre Rotulagem Nutricional*), in which the agency indicated

that the most appropriate FOPL model for Brazil would be a warning label, with examples of stop sign, triangle, circle and magnifying glass (ANVISA, 2018). The TPS was notified to the World Trade Organization at the time (WTO).

Between May and August 2019, Anvisa promoted a series of technical meetings with the actors involved in the regulatory process, in order to discuss issue of the new regulation that were raised in the TPS. Finally, in September 2019 Anvisa opened the final public consultation based on the Report on Regulatory Impact Analysis on Nutrition Labelling (*Relatório de Análise de Impacto Regulatório sobre Rotulagem Nutricional*), in which the agency indicated the magnifying glass as the most appropriate FOPL model for Brazil with a nutrient profile model created by Anvisa, which is not so strict as the PAHO model (ANVISA, 2019). It is important to highlight that both public consultation from 2018 and 2019 were extended. The first one, by a writ provoked by the food industry, and the second one without explanation by Anvisa.

As next steps, Anvisa published the schedule for 2020/2021, with the discussion of the nutrition labelling regulatory process for the third quarter of 2020, justified by the Covid-19 pandemic. The discussions about the harmonization in MERCOSUR advanced much less than the national discussions in Brazil. The challenge is even greater with the government changes took place in Brazil and Argentina in 2019, because the harmonization process depends a lot on the general diplomatic relationship between countries. Anvisa, as a member of the working group in MERCOSUR about food labelling (GT3), tries to move forward with the discussion in order to ensure that the work in Brazil is not invalidated and to prove that the country is making efforts in this regard. So far, no agreement has been reached about how the countries will move forward, however the most likely is a partial harmonization, with no date to be concluded yet.

2. Objectives

a. General objectives

‘The aim of this multi-component research study is to provide evidence in order to promote effective mandatory FOP labelling systems in Brazil and Argentina but also to support policy discussions in the rest of MERCOSUR countries’.

The evidence on the regulatory context of Brazil and on the legal decisions related to public health, together with the arguments used by the food industry during the regulatory process of nutrition labelling provided strategic information to prove that Brazil can advance on this issue without depending on the MERCOSUR decision, and to be used in the case of a judicialization of the process or the regulation content by the food industry when the time comes. The evidence generated by this project was also useful to sensitize and aware the general population and decision makers on nutrition labelling during the past years. It is worth mentioning that international

discussions occurred based on the evidence from this project, which is particularly important for the advances on nutrition labelling in the region and the maintenance of the FOPL in Chile, Peru, Uruguay and Mexico.

b. Specific objectives

1. To analyze the Argentinean and Brazilian regulatory framework, and the MERCOSUR and other international guidelines and principles to determine potential political facilitators and barriers for the introduction of a FOP labelling system.

With the analysis of the Brazilian and the MERCOSUR regulatory framework, we got to identify that a unilateral advance of a country on food labelling is possible and justifiable, especially when it is related to the defense of life, health and information to the population. Brazil already have legal precedents related to food labelling (allergens and lactose), when the State decided to advance regardless of the MERCOSUR, to protect the health of its citizens, including a short deadline for the implementation. However, the prioritization of trade and economic over public health interests is not rare.

2. To analyze legal cases from superior courts related to products that pose risks to public health as tobacco, asbestos and others in order to explore the legal arguments used and to extrapolate its applicability as a public health precedent for the promotion of FOP food labelling.

Thinking ahead, this objective was developed for a possible judicialization of the regulatory process or the regulation content by the food industry with the aim to stop or delay the implementation of the norm. With the findings of this objective, we have strategic information about the legal precedents related to public health in the Superior Courts in Brazil to be used when the time comes.

3. To analyze and document the arguments used by the food industry to hinder the promotion of FOP labelling in countries in the region.

With the analysis of the arguments used by the food industry we could prepare ourselves for the participation on the public consultation by foreseeing their contributions and to prepare counter arguments to be used in interviews, technical meeting and other public spaces.

3. Methodology

For objectives 1 and 2, we hired a lawyer consultant (Dr Maria Cecília Cury Chaddad) who has

experience on regulatory processes at Anvisa and on food labelling. Since these objectives have a legal character, the methodology used was based on the review of public and legal documents. For the methodological approach of the objective 2, based on previous discussions with FIC Argentina team, we selected the Brazilian cases related to public health that arrived on the Superior Courts. This decision was based on the organization of the judiciary power in the country and on the amount of available cases to be evaluated. Also, considering that FIC Argentina has a lot of experience on tobacco and this is an issue that can be extrapolated to food, we decided that these cases would be their responsibility in the same specific objective of their project.

For objective 3, we invited two researchers (Dr Mélissa Mialon and Dr Neha Khandpur) experienced in the analysis of food industry arguments. Dr Mialon is one of the main researchers working on the influence of the tobacco and, more recently, UPPs industries on public policies, having developed a specific methodology to analyze their arguments to stop and/or delay the implementation of policies. With these partnerships, we discussed the methodology with FIC Argentina team and decided to focus the analysis on the arguments of the trade associations and industry groups only, since the regulatory process for the improvement of the nutrition labelling is already on going in Brazil and numerous actors in the food industry are involved in the process. The analysis included two specific and important moments of the regulatory process that were the official opening of the regulatory process and the TPS. Unfortunately, other important stages of the regulatory process could not be included in the analysis because of the time they happened.

4. Project activities

Regarding the objectives 1 and 2, since the methodology used was based on the review of public and legal documents, with the available resources we hired Cecília Cury to develop the products of both objectives. The consultant also participated on the online and the first presential meetings.

For the first legal paper published, we counted on the former lawyer of the Healthy and Sustainable Diets Program (Dr Nathália Miziara) and the current Director of Institutional Relations of Idec (Dr Igor Britto), who worked/works very close to the team on the regulatory process of nutrition labelling.

At first, the objective 3 was at Dr Cecília's responsibility. However, when we started to discuss and develop the methodology, we realized that it was a more scientific, health and nutrition-related work, so we decided to partner with Dr Mélissa Mialon and Dr Neha Kandhpur, a food engineer and a nutritionist. For this study, we used public information from Anvisa and data from the clipping service previously hired by Idec to check on the media.

In order to address the gender aspect on the project, we took advantage of two contacts in the law field: Dr Lígia Paula Pires Pinto, researcher and coordinator of the Research Center in Law, Gender and

Identity of the Law School of São Paulo – Getulio Vargas Foundation (FGV), and Dr Flavia Piovesan, Professor at the Pontifical Catholic University of São Paulo (PUC-SP) in Law and Brazilian representative at the Inter-American Commission on Human Rights. In the first meeting, we discussed gender aspects to be addressed in the present project, and in the second meeting, we gathered women from the Healthy and Sustainable Diets Program of Idec, partners from ACT Health Promotion and Natacha Lecours from IDRC to discuss future research including gender aspects. For the meeting with Dr Flavia, we offered the scientific paper “Research on food-related chronic diseases in Latin America and the Caribbean: Are we building the evidence for gender-equitable approaches?” (LUDWICK & NERI, 2019), which was a result of the Healthier Food Systems in Latin America and the Caribbean event hosted by Idec and IDRC in Mairiporã in 2017, as a preparation document for all participants.

In November 2019, we organized the event “*Regulação da Rotulagem de Alimentos: Desafios para a América Latina*” to discuss the legal challenges of implementing FOPL in Latin America and MERCOSUR, with the presence of researchers and policy makers from Brazil, Argentina, Peru, Uruguay and Chile to foment the debate.

Taking advantage of the presence of the researchers and civil society representatives (Idec, ACT, FIC Argentina, Nupens/USP, PAHO, NUPPRE/UFSC, GHAI, CGAN/Ministry of Health, and Jaime Delgado), from different locations of Brazil and Latin America because of the event, we hosted a closed work meeting on food labelling and MERCOSUR.

Based on the findings of the specific objectives of the project, we developed several communication materials to translate and disseminate legal and scientific evidence on FOPL. Among them, we developed executive summaries, fact sheets, infographics, Q&As etc. Some of these materials are already on the Feeding Policies (*Alimentando Políticas - AP*)’s website. The other research will be included in the website as soon as they are published in scientific journals. The AP is an output of the IDRC project ID 108166; it is a website that translates scientific evidence providing scientific basis for public managers, decision and policy makers to create, develop and propose effective public policies related to food and nutrition.

In June 2019, we started shooting a short documentary about conflicts of interests in food and nutrition policies in Brazil. The objective of this material is mainly awareness, presenting the subject to the general public and showing the public managers, policy and decision makers how the food industry can influence their work. The documentary will include an important focus on the labelling regulatory process, since different kinds of corporate political activities were used during the entire process as an attempt to hinder and/or delay it. The shooting happened in Rio de Janeiro, when main researchers on this theme were in Brazil to participate in an event about food systems. From November 2019 to February 2020, we filmed the last interviews and, right now, the films are being finished. We have done 11 interviews with lawyers,

nutritionists, and researchers from Brazil and other countries. In the beginning, we were planning to do only five interviews, which delayed the completion of the videos and, consequently the launch of the documentary. The launch was supposed to happen in mid-March 2020, however, because of the coronavirus pandemic, we have not set a date to launch it yet. We expect the film to be ready in May 2020; from there, we will plan its launch according to the context of the following months. Because of the great quality of the testimonials we recorded, we decided to make 20 min videos and 1 min video pills for social media, so that we can have more materials to deepen the information for those who are more interested to learn about this issue.

The communication team worked closely to the research team, freelancer professionals and companies to develop all the materials. For that, their time to do and respond to the demands, such as the production of the short documentary and the review of research summaries, needed to be considered, since each team has their workflow, timing and priorities.

5. Project outputs

The main achievement related to the objective 1 was the evidence and the arguments gathered to prove that it is possible to advance with a FOPL in Brazil independently of the MERCOSUR rules, since it is a matter of public health and consumers right to information. For that, we developed a scientific work for an international conference, a legal paper, and advocacy materials such as executive summary, fact sheet, policy brief and infographic. In this way we could reach different audiences.

Since the objective 2 is a more strategic for the regulatory process about nutrition labelling in Brazil, we decided to keep the findings to be used when the time comes. So, we developed internal documents (report and executive summary) and a legal paper that should be finished and submitted in July 2020. This paper is still under development, because we had to shift its aims due to the changes that occurred in the regulatory process regarding the design of the FOPL model proposed by Anvisa in the final stages of the regulatory process.

Regarding objective 3, the main achievement was to understand and compile the arguments used by the food industry to hinder, block and delay the regulatory process about nutrition labelling, so we can be prepared to respond to them when needed. For that, we developed a scientific paper, and communication and advocacy materials such as Q&A and fact sheet, besides a special page in the AP's website, which is directed to policy and decision makers. Inspired by that, we are also finishing the production of a short documentary about conflicts of interest in food and nutrition public policies, which is very innovative, since this topic is little known and discussed in the country and it will serve to raise

population and policy makers' awareness.

It is important to highlight that we faced some difficulties to publish the scientific paper "An analysis of arguments used by trade associations against the adoption of front-of-pack nutrition warning labels in Brazil". At first, we submitted the paper to *Globalization & Health* in June 2019, when it was desk rejected and forwarded to *BMC Public Health*, which was a better fit for the subject. However, after months without any response from the journal, we decided to question about the paper, when they said they were looking for other reviewers. After nine months, at the end of March 2020, the paper was rejected by the journal with four biased revisions, as they seemed to have conflicts of interests with the food industry. Since we were surprised with the decision and the arguments of the reviewers, we decided to question the journal once more, which maintained the decision. Finally, we submitted the paper to *Critical Public Health* in April 2020 and we hope to have it published in the next three months.

Despite this clear situation of conflicts of interest in a scientific journal, we planned the development of another scientific paper on this subject, with the analysis of the contributions of the food industry on the final public consultation that happened from September to December 2019.

To address the gender perspective of the project, we included some discussion on the scientific paper about the arguments used by the trade associations against the adoption of a FOP warning label in Brazil. Also, we discussed the issue with two specialists in law and women rights. For that, we hosted a work meeting with women representatives from Idec, ACT Health Promotion and IDRC from different areas (nutrition, law, communication, management). For the next steps on gender perspective, many ideas came up for new projects on the analysis of TV commercials and food labelling (data already collected in the IDRC project ID 108166).

To put all the findings of the project together, we hosted the event "*Regulação da Rotulagem de Alimentos: Desafios para a América Latina*" focusing on the discussion of the legal challenges for the implementation of a FOPL in Latin America and MERCOSUR, with the presence of researchers and policy makers from Brazil, Argentina, Peru, Uruguay and Chile. For that we used the AP brand, with sending six emails marketing before the event with the main information from the seminar to engage subscribers. The event received 86 participants, among them, researchers, students, lawyers, nutritionists and government and food industry representatives. The videos of the presentations and the event summary are on the AP Youtube channel, so the reach of the event and the discussed themes can be increased.

The success of this event is based on the learning experience we had with the organization of the seminar "*Da ciência ao prato: políticas públicas para uma alimentação saudável*" (<http://alimentandopoliticas.org.br/cienciaaoprato/>), which happen in September 2019 (part of the IDRC project ID 108166). The first point was the engagement with our audience. We bet on communications that

worked and we had time to do the actions in a planned and measured way. Also, we changed the number of subscribers. For seminar of the present project, we expanded the participation list and we did not have a waiting list; as a result, the number of participants was the expected. The last item that we believe made a difference was in terms of duration. As the event was held in just one day, not two like the previous one, more people have programmed themselves and were committed to staying all day long.

It is important to highlight that some advocacy and communication materials were developed in Portuguese, Spanish and English, with the aim to reach as many people as possible, especially in Latin America, since it is a matter of the MERCOSUR and can impact many other countries that are going through the same process or planning to advance in this issue.

Table 1. Outputs of the project.

Objective	Type of outputs	Output name or title	Author(s)	Date	Journal/Website/Event
To comparatively analyze the Brazilian regulatory scenario of food labelling with the MERCOSUR scenario and other international norms and guidelines.	Final report of the objective 1 (Brazil)	<i>Consultoria jurídica para análise da estrutura regulatória nacional e internacional relacionada à rotulagem de alimentos: análise comparativa do cenário regulatório brasileiro sobre rotulagem de alimentos com o cenário do MERCOSUL e de outras normas e guidelines internacionais</i>	Idec	May, 2018	Internal document
To analyze the Brazilian, the Argentinian and the MERCOSUR legislation on food labelling.	Poster	<i>La regulación de envases de alimentos y bebidas en el MERCOSUR: perspectiva legal</i>	Belén Ríos, Berenice Cerra, Maria Cecília Chaddad, Luciana Castronuovo, Victoria Tiscornia, Laís Mais, Ana Paula Martins and Lorena Allemandi	Presented in November 2018	SLAN Guadalajara, México
To analyze the legal cases on health and food labelling, identifying the theoretical references and arguments that apply to the regulation of food labelling in Brazil and other MERCOSUR countries.	Final report of the objective 2 (Brazil)	<i>Consultoria jurídica para análise da estrutura regulatória nacional e internacional relacionada à rotulagem de alimentos: análise de casos judiciais da área de saúde e rotulagem de alimentos, identificando os referenciais teóricos e argumentos que se aplicam à regulamentação da rotulagem nutricional no Brasil e em outros países do MERCOSUL</i>	Idec	November, 2018	Internal document
To evaluate the Brazilian regulatory framework, including MERCOSUR and other international documents to determine potential facilitators and obstacles to the implementation of FOP labelling; and to study the precedents in the Brazilian Superior Courts related to judicial decisions on products that have impacts on public health in order to explore the legal	Executive summary of the objectives 1 and 2 (Brazil)	<i>Promoção de políticas de rotulagem frontal de alimentos no Brasil</i>	Idec	March, 2019	Internal document

arguments used and extrapolate them to promote the FOP labelling in foods.					
To translate the findings of the final report of the objective 1 from Brazil and Argentina.	Fact sheet (in Spanish)	<i>Análisis de los escenarios regulatorios de Brasil y Argentina sobre etiquetado nutricional de alimentos en el contexto del MERCOSUR</i>	Idec and FIC Argentina	April, 2019	https://alimentandopoliticas.org.br/promocao-de-politicas-de-rotulagem-nutricional-frontal-de-alimentos-no-brasil-e-argentina/
To translate the findings of the final report of the objective 1 from Brazil and Argentina.	Fact sheet (in Portuguese)	<i>Análise dos cenários regulatórios do Brasil e da Argentina sobre rotulagem nutricional de alimentos no contexto do MERCOSUL</i>	Idec and FIC Argentina	April, 2019	https://alimentandopoliticas.org.br/promocao-de-politicas-de-rotulagem-nutricional-frontal-de-alimentos-no-brasil-e-argentina/
To translate the findings of the final report of the objective 1 from Brazil and Argentina.	Fact sheet (in English)	An analysis of regulatory scenarios on food labeling in Brazil and Argentina within the overall context of MERCOSUR	Idec and FIC Argentina	April, 2019	https://alimentandopoliticas.org.br/promocao-de-politicas-de-rotulagem-nutricional-frontal-de-alimentos-no-brasil-e-argentina/
To discuss the regulation of the nutrition food labelling and the review process of the current labelling standard in Brazil established by Anvisa.	Legal paper	<i>Judicialização do processo de revisão do modelo de rotulagem nutricional brasileiro</i>	Igor Britto, Nathália Miziara, Laís Mais e Ana Paula Bortoletto	September, 2019	<i>Revista de Direito do Consumidor</i>
To discuss ways to incorporate the gender perspective on research related to food systems.	Work meeting	<i>Perspectivas de gênero em pesquisas relacionadas aos sistemas alimentares</i>	Idec	September, 2019	São Paulo, Brazil
To discuss the national and international regulatory challenges and the food industry interference to implement a FOPL in the Latin America, especially in MERCOSUR.	Event	<i>Regulação da rotulagem de alimentos: desafios para a América Latina</i>	Idec	November, 2019	São Paulo, Brazil
To discuss about the regulatory scenario of food labelling in Latin America, especially in MERCOSUR.	Work meeting	<i>Reunião de trabalho sobre rotulagem nutricional e MERCOSUL</i>	Idec	November, 2019	São Paulo, Brazil
To translate the discussions of the event “Regulação da rotulagem de alimentos: desafios para a América Latina”.	Videos	<i>Regulação da rotulagem de alimentos: desafios para a América Latina</i>	Idec	December, 2019	https://www.youtube.com/playlist?list=PLN7m6qoLqo71Y04hwl3eDgTEgpPiwcMVN
To translate the findings of the final report of the objective 1 from Brazil and Argentina.	Policy brief (in Spanish)	<i>Promoción de políticas de etiquetado nutricional frontal de alimentos en Brasil y Argentina</i>	Idec and FIC Argentina	December, 2019	https://alimentandopoliticas.org.br/promocao-de-politicas-de-rotulagem-nutricional-

					frontal-de-alimentos-no-brasil-e-argentina/
To translate the findings of the final report of the objective 1 from Brazil and Argentina.	Policy brief (in Portuguese)	<i>Promoção de políticas de rotulagem nutricional frontal de alimentos no Brasil e na Argentina</i>	Idec and FIC Argentina	December, 2019	https://alimentandopoliticas.org.br/promocao-de-politicas-de-rotulagem-nutricional-frontal-de-alimentos-no-brasil-e-argentina/
To translate the findings of the final report of the objective 1 from Brazil and Argentina.	Policy brief (in English)	Promoting front-of-package nutrition labeling policies in Brazil and Argentina	Idec and FIC Argentina	December, 2019	https://alimentandopoliticas.org.br/promocao-de-politicas-de-rotulagem-nutricional-frontal-de-alimentos-no-brasil-e-argentina/
To discuss the regulation of the nutrition food labelling and the review process of the current labelling standard in Brazil established by Anvisa.	Website page	<i>Como a indústria de alimentos ultraprocessados utiliza de meios judiciais para impedir que os brasileiros saibam o que estão comendo</i>	Idec	March, 2020	https://alimentandopoliticas.org.br/pesquisa/como-a-industria-de-alimentos-ultraprocessados-utiliza-de-meios-judiciais-para-impedir-que-os-brasileiros-saibam-o-que-estao-comendo/
To identify the arguments used by food industry actors against the adoption of FOP warning labels in Brazil, in order to better understand their positions and arguments that could have a negative influence on the policy process.	Scientific paper (objective 3 – Brazil)	An analysis of arguments used by trade associations against the adoption of front-of-pack nutrition warning labels in Brazil	Mélissa Mialon, Neha Khandpur, Laís Mais e Ana Paula Martins	Submitted in April, 2020	Critical Public Health
To translate the findings of the legal paper “ <i>Judicialização do processo de revisão do modelo de rotulagem nutricional brasileiro</i> ”	Infographic	<i>Judicialização do processo de revisão do modelo de rotulagem nutricional</i>	Idec	To be released in June, 2020	www.alimentandopoliticas.org.br
To disclosure the main arguments used by the food industry against the new food labelling in Brazil, based on the findings of the scientific paper “An analysis of arguments used by trade associations against the adoption of front-of-pack nutrition warning labels in Brazil”.	Q&A	<i>As armadilhas da indústria de alimentos ultraprocessados</i>	Idec	To be released in June, 2020	---

To disclose the main arguments used by the food industry against the new food labelling in Brazil, based on the findings of the scientific paper "An analysis of arguments used by trade associations against the adoption of front-of-pack nutrition warning labels in Brazil".	Fact sheet	<i>Quanto mais você sabe, melhor você come</i>	Idec	To be released in June, 2020	---
To discuss what is the legal framework that substantiate Anvisa's legitimacy, how the food labelling regulatory process is being conducted, and if there is normative support for a unilateral regulation by Anvisa in the international trade context.	Legal paper	<i>Revisão dos requisitos da rotulagem nutricional no contexto do comércio internacional: presença de interesse legítimo de proteção da saúde pública e dos consumidores brasileiros</i>	Maria Cecília Chaddad, Laís Mais and Ana Paula Bortoletto	To be submitted in July, 2020	<i>Revista de Direito do Consumidor</i>
To disclose the research and to disseminate the content related to the project to non-governmental organizations, academy and opinion leaders.	Short documentary about conflicts of interest	BIG FOOD "O poder das indústrias de ultraprocessados"	Idec	To be released until the end of 2020 because of the coronavirus pandemic	---
To translate the findings of the scientific paper "An analysis of arguments used by trade associations against the adoption of front-of-pack nutrition warning labels in Brazil".	Website page	Freedom and responsibility	Idec	To be released when the scientific paper is published	<i>Alimentando Políticas'</i> website

6. Project outcomes

The project allowed the development of several important materials and political incidence during the regulatory process about nutrition labelling in Brazil, which can be extrapolated to other Latin American countries, especially those that are part of the MERCOSUR.

From the results of the objective 1, we got to strengthen the regulatory process at Anvisa, since Brazil have the power to advance on the issue of nutrition labelling without waiting for the advances of the discussions and harmonization at MERCOSUR. With the advocacy materials developed, more policy and decision makers are aware of the Brazilian regulatory scenario and the importance to be given for matters of public health and consumers right to information. We also used the findings to write the petition requesting the approval of Idec as *amicus curiae* in the case of the Brazilian Food Industry Association (*Associação Brasileira da Indústria de Alimentos – ABIA*) requesting an extension on the deadline of the TPS by Anvisa.

As above mentioned, the results of the objective 2 are strategic and will be used in case of a judicialization of the regulatory process or part of the content of the norm by the food industry. With the mapping of the public health cases judged on the Brazilian Superior Courts, we can plan our next steps in a more effective way in order to protect the regulatory process and Anvisa against the influence of the trade associations. Also, from the writing of the legal papers, we got to discuss possible scenarios to be prepare for multiple events regarding the nutrition labelling issue.

With the findings of the objective 3, we were able to develop communication materials to raise awareness of the population and policy makers on the arguments used by the food industry to hinder and delay the regulatory process on nutrition labelling. With the compilation of these arguments, we expect to prove that the industry has influenced the labelling process in the country to delay or distance the outcome from the public health interests. Therefore, it is necessary to prevent the sector from continuing to participate in the decision-making process regarding regulatory policies that impact its production and aim to promote healthy and sustainable food, as in the case of tobacco, which led to the creation of the Framework Convention on Tobacco Control.

Advocacy materials are useful during these final steps of the regulatory process. The awareness of the general public and policy and decision makers on conflicts of interest will also be raised with the launch of the short documentary about conflicts of interest, which is a subject little known and discussed in the country.

We developed communication materials to disseminate all the strong body of evidence by this project and contribute to the discussion of the effective public policies in food and nutrition. Our materials were used both during events, in which we had either participated or organized, and by the advocacy team during visits to policy and decision makers. Also, all the materials and events carried out through this project helped us build

a dialogue with the civil society and Anvisa during the public consultation. During this period, changes in FOPL were the subject of 374 media articles, and Idec and its partners were mentioned in 335 of them.

The inclusion of the communication and advocacy materials in the AP's website is important, since this is a project aimed to build effective food policies in Brazil. We do not know about any other platform in Brazil that do the same thing, and, because of that, a lot of researchers have been contacting us to publish their studies and help us on the development of the website. After one year since its launch, its potential is truly clear.

It is important to highlight that all the evidence and knowledge developed in this project was used directly on the different steps of the regulatory process, especially during the final public consultation that happened in the end of 2019 and was a decisive moment for the food regulation in Brazil. Idec also contacted international partners, including from Latin America, who participated on the Brazilian public consultation in favor of the warning labels, sharing their experience and scientific evidence.

Finally, meeting with strategic partners from Brazil and Latin America in November 2019 was extremely important to build a plan for the next steps regarding the MERCOSUR meetings with the countries who are part of the bloc. Discussing how to delay any MERCOSUR decision that could prevent the countries to advance independently is essential to have the implementation of warning labels in as many countries as possible in the region, which strengthen the FOPL model.

7. Overall assessment and recommendations

This project was constructed and developed in a particularly important moment for the Latin America region, including Brazil, that is going through the regulatory process on nutrition labelling, with a lot of pressure and food industry interference in Anvisa. Many attempts of hindering, blocking and delaying the process were seen, such as nomination of specific directors at Anvisa, evidence with conflicts of interest, participation on the table discussions, economic arguments (including MERCOSUR as a barrier for the country to advance independently), among others.

The experience of conducting this project together with FIC Argentina was extraordinarily rich, since it is a very experienced group of researchers and advocates who are inserted in the food labelling discussions in their country and in MERCOSUR. Having the opportunity to share and exchange ideas, methodologies, arguments and strategies to work together as civil society organizations was essential to push advances on nutrition labelling in the region.

It is important to highlight that the project was designed almost two years and a half ago, when the political scenario in Brazil was different from the one we are currently facing. From 2018 to 2020, new challenges appeared: the value of scientific evidence to support public policies has been questioned, the participation of civil society on political discussion was underestimated or removed, and the more liberal position of the current

government on the set of public policies increased. Because of that, some changes in project were necessary and the aim of the project became more and more important to be reached, in order to protect the regulatory process officially initiated together with this project and to keep civil society and academia's voices being heard.

With this project we proved the necessity of studying and understanding the regulatory context of each public policy intended to be changed, improved or implemented, in the national and international levels. Since in Brazil the food industry occupies a lot of seats in discussion and decision-making tables, it is also imperative to study and understand their arguments and strategic movements towards the hindering, blocking or delay of public policies, so we can anticipate their steps and prevent future interferences. With the possibility of having a norm or a law judicialized by the food industry to prevent its implementation, it is also interesting to map the legal actors of the law system of the country as a preparation and anticipation of scenarios.

In the case of Brazil, that has a regulatory process on nutrition labelling on going since the beginning of this project, the generation of legal and scientific evidence was essential to be used in each and every step of the process, especially during the TPS and the final public consultation, in order to validate our positioning and arguments in favor of the implementation of warning labels.

To spread the findings of this project and others regarding public health nutrition, we plan to maintain the AP's website updated with the research from this project that are not published yet and with new research about the AP themes and others related to food and nutrition and public policies. The AP is a tool of great potential to translate and disseminate scientific evidence to the general public, to other media vehicles, to other researchers and, especially, to policy and decision makers. With that, we have the possibility to keep setting the narrative, sensitizing and informing people, and advancing with food environment discussions on policy discussion tables.

With the communication actions on this project, we realized the power that promoting cross country events and developing and disseminating materials in other languages in our channels have to set the narrative in the region. A possible next step regarding the communication with other countries of the region is to open AP website to receive research from other countries on food environment and food policy as a strategy of the Community of Practices IDRC project (ID 109035-002).

For future projects, we would like to keep studying MERCOSUR context, influence/interference in the countries, and internal processes so we can prevent setbacks and take advantage of this space to set the narrative and advance with the best strategies on public policies. Another space that needs to be better understood and occupied is the Codex Alimentarius, with the same aim of the MERCOSUR study. Specifically about the nutrition labelling regulatory process in Brazil, we plan to analyze the contributions of trade associations and food industries

on the final public consultation of Anvisa and to protect and monitor the implementation of the new regulation.

8. References

AGÊNCIA NACIONAL DE VIGILÂNCIA SANITÁRIA (Anvisa). Relatório Preliminar de Análise de Impacto Regulatório sobre Rotulagem Nutricional. 2018. Available at: <http://portal.anvisa.gov.br/documents/33880/2977862/An%C3%A1lise+de+Impacto+Regulat%C3%B3rio+sobre+Rotulagem+Nutricional_vers%C3%A3o+final+3.pdf/2c094688-ae44-441d-a7f1-218336995337>.

AGÊNCIA NACIONAL DE VIGILÂNCIA SANITÁRIA (Anvisa). Relatório de Análise de Impacto Regulatório sobre Rotulagem Nutricional. 2019. Available at: <<http://portal.anvisa.gov.br/documents/33880/5313808/Relat%C3%B3rio+de+An%C3%A1lise+de+Impacto+Regulat%C3%B3rio+sobre+Rotulagem+Nutricional.pdf/31d15194-568c-4862-82ec-97e38202b1a1>>.

BRASIL. Ministério da Saúde. Vigitel Brasil 2018: Vigilância de fatores de risco e proteção para doenças crônicas por inquérito telefônico - Estimativas sobre frequência e distribuição sociodemográfica de fatores de risco e proteção para doenças crônicas nas capitais dos 26 estados brasileiros e no distrito federal em 2018. Brasília-DF, 2019.

CANHADA, S.L. *et al.* Ultra-processed foods, incident overweight and obesity, and longitudinal changes in weight and waist circumference: the Brazilian Longitudinal Study of Adult Health (ELSA-Brasil). *Public Health Nutrition*, 23(6): 1076-86, 2019.

HALL, K. D. *et al.* Ultra-processed diets cause excess calorie intake and weight gain: an inpatient randomized controlled trial of *ad libitum* food intake. *Cell Metabolism*, 30, 67-77, 2019.

HENNIS, a.; GOMES, F. Opinion: reshaping the food environment to reduce NCDs. 2018. Available at: <<https://www.devex.com/news/opinion-reshaping-the-food-environment-to-reduce-ncds-92688>>.

KHANDPUR, N. *et al.* Are front-of-package warning labels more effective at communicating nutrition information than traffic-light labels? A randomized controlled experiment in a Brazilian sample. *Nutrients*, 10(6): 688, 2018.

KHANDPUR, N.; SWINBURN, B.; MONTEIRO C.A. Nutrient-based warning labels may help in the pursuit of healthy diets. *Obesity*, 26(11): 1670-1, 2018.

KHANDPUR N. *et al.* Choosing a front-of-package warning label for Brazil: A randomized, controlled comparison of three different label designs. *Food Research International*, 212: 854-61, 2019.

LOUZADA, M.L.C. *et al.* Consumption of ultra-processed foods and obesity in Brazilian adolescents and adults. *Preventive Medicine*, 81: 9-15, 2015.

LOUZADA, M.L.C.; RICARDO, C.Z.; STEELE, R.M., LEVY, R.B.; CANNON, G.; MONTEIRO, C.A. The share of ultra-processed foods determines the overall nutritional quality of diets in Brazil. *Public Health Nutrition*, 21(1): 94-102, 2018.

LUDWICK, T.; NERI, D. Research on food-related chronic diseases in Latin America and the Caribbean: Are we building the evidence for gender-equitable approaches? *Pan American Journal of Public Health*, 43: e43, 2019.

PAN AMERICAN HEALTH ORGANIZATION (PAHO). Plan of Action for the Prevention of Obesity and Overweight in Children and Adolescents. 2014. Available at: <https://iris.paho.org/bitstream/handle/10665.2/49138/obesity-plan-of-action-child_eng_2015.pdf?sequence=1&isAllowed=y>.

PAN AMERICAN HEALTH ORGANIZATION (PAHO). Pan American Health Organization Nutrient Profile Model. 2016. Available at: <https://iris.paho.org/bitstream/handle/10665.2/18621/9789275118733_eng.pdf?sequence=9&isAllowed=y>.

SATO, P.M. *et al.* Consumers' opinions on warning labels on food packages: A qualitative study in Brazil. PLoS One, 14(6): e0218813, 2019.

SPUTNIK. "El gobierno electo de Uruguay anuncia que no priorizará control de etiquetado de alimentos". 2020. Available at: <<https://mundo.sputniknews.com/america-latina/202002171090504415-el-gobierno-electo-de-uruguay-anuncia-que-no-priorizara-control-de-etiquetado-de-alimentos/>>.

URUGUAY. Decreto N° 272/018 de 29/08/2018. 2018. Available at: <<https://www.impo.com.uy/bases/decretos/272-2018/1>>.

WORLD HEALTH ORGANIZATION (WHO). Report of the Commission on ending childhood obesity. 2016. Available at: <https://apps.who.int/iris/bitstream/handle/10665/204176/9789241510066_eng.pdf;jsessionid=76F64EA638AB9193D2ABB2046AEA71F7?sequence=1>.

9. Appendices

Appendix	Type of document	Content	Language
Appendix 1*	Agenda	Agenda of the first presential meeting – Idec and FIC Argentina – April 2018, Buenos Aires, Argentina	English
Appendix 2*	Final report of the objective 1	<i>Consultoria jurídica para análise da estrutura regulatória nacional e internacional relacionada à rotulagem de alimentos: análise comparativa do cenário regulatório brasileiro sobre rotulagem de alimentos com o cenário do MERCOSUL e de outras normas e guidelines internacionais</i>	Portuguese
Appendix 3*	Appendix 1 – final report of the objective 1	Table of the evaluated norms	Portuguese
Appendix 4*	Appendix 2 – final report of the objective 1	<i>Resolução de Diretoria Colegiada – RDC nº 18, de 24 de março de 2008</i>	Portuguese
Appendix 5	Poster	<i>La regulación de envases de alimentos y bebidas en el MERCOSUR: perspectiva legal</i>	Spanish
Appendix 6*	Final report of the objective 2	<i>Consultoria jurídica para análise da estrutura regulatória nacional e internacional relacionada à rotulagem de alimentos: análise de casos judiciais da área de saúde e rotulagem de alimentos, identificando os referenciais teóricos e argumentos que se aplicam à regulamentação da rotulagem nutricional no Brasil e em outros países do MERCOSUL</i>	Portuguese
Appendix 7*	Executive summary of the objectives 1 and 2	<i>Promoção de políticas de rotulagem frontal de alimentos no Brasil</i>	Portuguese
Appendix 8*	Agenda	Agenda of the second presential meeting – Idec and FIC Argentina – April 2019, Buenos Aires, Argentina	Spanish
Appendix 9	Fact sheet	<i>Análisis de los escenarios regulatorios de Brasil y Argentina sobre etiquetado nutricional de alimentos en el contexto del MERCOSUR</i>	Spanish
Appendix 10	Fact sheet	<i>Análise dos cenários regulatórios do Brasil e da Argentina sobre rotulagem nutricional de alimentos no contexto do MERCOSUL</i>	Portuguese
Appendix 11	Fact sheet	An analysis of regulatory scenarios on food labeling in Brazil and Argentina within the overall context of MERCOSUR	English
Appendix 12*	Report of the work meeting	Work meeting about gender	Portuguese
Appendix 13	Legal paper	<i>Judicialização do processo de revisão do modelo de rotulagem nutricional brasileiro</i>	Portuguese
Appendix 14*	Report of the work meeting	<i>Perspectivas de gênero em pesquisas relacionadas aos sistemas alimentares</i>	Portuguese

Appendix 15*	Report of the event	<i>Regulação da rotulagem de alimentos: desafios para a América Latina</i>	Portuguese
Appendix 16*	Report of the work meeting	Work meeting about nutrition food labelling and MERCOSUR	Portuguese
Appendix 17	Policy brief	<i>Promoción de políticas de etiquetado nutricional frontal de alimentos en Brasil y Argentina</i>	Spanish
Appendix 18	Policy brief	<i>Promoção de políticas de rotulagem nutricional frontal de alimentos no Brasil e na Argentina</i>	Portuguese
Appendix 19	Policy brief	Promoting front-of-package nutrition labeling policies in Brazil and Argentina	English
Appendix 20**	Scientific paper	An analysis of arguments used by trade associations against the adoption of front-of-pack nutrition warning labels in Brazil	English
Appendix 21**	Infographic	<i>Judicialização do processo de revisão do modelo de rotulagem nutricional</i>	Portuguese
Appendix 22**	Q&A	<i>As armadilhas da indústria de alimentos ultraprocessados</i>	Portuguese
Appendix 23**	Fact sheet	<i>Quanto mais você sabe, melhor você come</i>	Portuguese
Appendix 24**	Legal paper	<i>Revisão dos requisitos da rotulagem nutricional no contexto do comércio internacional: presença de interesse legítimo de proteção da saúde pública e dos consumidores brasileiros</i>	Portuguese
Appendix 25*	Short documentary script	BIG FOOD “O poder das indústrias de ultraprocessados”	Portuguese
Appendix 26**	Website page	Freedom and responsibility	Portuguese

* Documents for internal use only. Confidential information; do not share.

** Preliminary version of the materials and documents may not be shared. Confidential information.

10. Annex

ANNEX 1: TRACKING PROGRAM LEVEL INDICATORS

We kindly request that you complete the following questionnaire on your project’s achievements. It includes a set of indicators selected to document and monitor outcomes of the Food, Environment, and Health Program at the global scale. These indicators will help our Program track progress toward the targets set in our Implementation Plan approved by IDRC’s board of governors in 2015. This exercise is for IDRC’s internal reporting only and is **not intended as an assessment of your project**. Results from your project will be aggregated with those from other funded projects in order to provide a picture of collective achievements for the program as a whole. Your input will help us assess and improve our programming.

This questionnaire should be **completed once a year by all grantees** and returned at the same time as your interim technical report. In some cases, you may be completing this questionnaire for the first time alongside your final technical report. The information in your technical report should assist you in completing the questionnaire.

<p>INSTRUCTIONS: Please provide answers to the questions below based on <u>actual</u> achievements and outcomes. If this is the first time you are completing this questionnaire, please include all achievements since the inception of the project. If you have submitted this questionnaire in the past, please add any new achievements or progress since your last report.</p> <p>In some cases, your responses to these questions may repeat achievements mentioned in the technical report. If this is the case, please extract (copy and paste is acceptable) the information here. Please keep your answers brief, limiting to one to two paragraphs per question.</p> <p>Projects are not expected to document achievements for each of the questions; it is normal that some questions may not apply to your project and remain blank.</p>	<p><i>This column left blank for internal purposes</i></p>
<p><i>Please provide identifying project information below:</i></p>	
<p>Project number: 108644-001 Project title: Front-of-package labelling (FOP): a collaborative regional study with countries members of the Common Southern Market (MERCOSUR) Date this report was prepared: April 30rd, 2020</p>	
<p>1a. What innovations is your project testing, assessing or adapting to reduce the burden of chronic or infectious diseases? A definition of an innovation is provided in the footnotes for your reference.¹ If your project has been contributing to multiple innovations, please describe them individually. Please describe briefly (limit to 1-2 paragraphs per reporting period)</p>	<p>Ind. #2</p>

¹ Innovations can be understood as new and significantly improved ways of doing or organizing something, and include the adaptation of existing products or processes to new contexts. They include: products (a market and/or publically distributed good); processes or practises (a new method, skill or behaviour that creates positive change); programs (organizational arrangements or system of services that meets a need for a defined community). Examples of innovations related to reducing the burden of infectious and chronic diseases could include testing; the use of screens in preventing Dengue and other Aedes mosquito transmitted diseases; the potential of community kitchens to provide healthier meals to low-income populations; applying a new methodology to assess food policies and food environments.

Year 1	0
Year 2	
<p>Year 3</p> <p>With the results from the objectives 1 and 2, we could advance in a more qualified way and with more scientific and juridical arguments in defense of the front-of-package (FOP) warning label in the regulatory process of nutrition food labelling in Brazil. Also, mapping the way this process works and knowing the way a possible judicialization would go give us more confidence and a more detailed comprehension of the scenario in Brazil and in the other countries in the region, especially in the Southern Common Market (<i>Mercado Común del Sur</i> - MERCOSUR). The findings of the objective 1 were used to write the petition requesting the approval of Idec as amicus curiae in the case of the Brazilian Food Industry Association (<i>Associação Brasileira da Indústria de Alimentos – ABIA</i>) requesting an extension on the deadline of the public consultation on nutrition food labeling by the National Health Surveillance Agency (<i>Agência Nacional de Vigilância Sanitária – Anvisa</i>). We also used the results of the whole project in our contributions for the TPS and the final public consultation.</p> <p>The development and translation of the communication materials, including fact sheet, policy briefs, videos and the event, directed to advocates from the Latin American region was a great way to share experiences and knowledge and to amplify the voices fighting for effective food policies in the region.</p>	
<p>1b. Of the innovations described in 1a), have any of them been applied at scale? For example, has the innovation been adopted for wide-scale use by a large population, by government, or applied in different contexts, countries, or markets? Explain how this innovation is being applied at scale and what processes have enabled wide-spread use and/or scale-up. Please describe briefly (limit to 1-2 paragraphs per reporting period)</p>	Ind. #3
Year 1	0
Year 2	
<p>Year 3</p> <p>In the case of the communication materials directed to advocates, we plan to use this experience and strategy in the Community of Practices IDRC project, so we can reach more people from the region in different contexts and food policies, beyond food labelling.</p>	
<p>1c. Approximately how many individuals are benefiting from the innovation? Please indicate the approximate number of beneficiaries, if this information is known</p>	Ind. #3
Year 1	0
Year 2	
<p>Year 3</p> <p>In the case of the findings from the specific objectives of the project, the entire Brazilian population is benefited since nutrition labelling is a national policy and the implementation of warning labels would help everyone to make healthier and more conscious food choices.</p> <p>Regarding the communication materials, all the advocates in Latin America who work with food policies, especially food labelling, are benefited.</p>	
<p>2. Is your project assessing policy effectiveness? If yes, please list and briefly describe what policies the project is assessing, and briefly comment on the relevance and potential impact. Please describe briefly (limit to 1-2 paragraphs per reporting period)</p>	Ind. #4

Year 1		0																
Year 2																		
Year 3																		
3a. List and describe the key activities/mechanisms your project engaged in to inform/influence practice or policy (e.g. multi-stakeholder and community processes, participation in policy dialogues or policy-setting processes, engagement in making policy recommendations, or other relevant actions). Please describe briefly (limit to 1-2 paragraphs per reporting period)		Ind. #5																
Year 1		Choose an item.																
Year 2																		
Year 3 The findings of the project were used in the participation in policy-setting policies in the case of the regulatory process of nutrition food labeling in Brazil. Idec and the Alliance for Adequate and Healthy Diets used the arguments for the recommendations during technical meetings, and for the contributions on the technical public consultation (<i>Tomada Pública de Subsídios – TPS</i>) and the final public consultation.																		
3b. Have any of the efforts described in 3a) contributed to new practices or policies <i>being implemented or existing policies/practices being changed</i> based partly or wholly on the work of the project? How were strategic stakeholders involved in these processes? Please describe briefly (limit to 1-2 paragraphs per reporting period)		Ind. #5																
Year 1		0																
Year 2																		
Year 3 In the technical report prepared and presented by Anvisa in the final public consultation recommended a “high in” front-of-package labelling (FOPL) model as the most adequate model for Brazil. Even though the policy is not implemented yet, it is a great sign for the region to keep advancing on this subject.																		
3c. What was the level of jurisdiction of the policy/policies implemented or changed?		Ind. 5																
		Choose an item.																
	<table border="1"> <thead> <tr> <th></th> <th><i>Identify the policy</i> e.g. regulation of TV food advertising to children in Peru</th> <th>Select level of jurisdiction 1= local/municipal/district 2= provincial/sub-national 3= national 4= multinational/international</th> <th>Year of Policy change</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td></td> <td></td> <td></td> </tr> <tr> <td>2.</td> <td></td> <td></td> <td></td> </tr> <tr> <td>3.</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>			<i>Identify the policy</i> e.g. regulation of TV food advertising to children in Peru	Select level of jurisdiction 1= local/municipal/district 2= provincial/sub-national 3= national 4= multinational/international	Year of Policy change	1.				2.				3.			
	<i>Identify the policy</i> e.g. regulation of TV food advertising to children in Peru		Select level of jurisdiction 1= local/municipal/district 2= provincial/sub-national 3= national 4= multinational/international	Year of Policy change														
1.																		
2.																		
3.																		
4a. Did your project intend to specifically benefit women, men, boys or girls or a marginalized group?																		
Please place an x in the box corresponding to the target group:																		

Intended to benefit mostly men/boys					
Intended to benefit mostly women/girls					
Intended to equally benefit women/girls and men/boys	X				
Intended to primarily benefit a marginalized group (name of the group): _____					
No intentional focus on gender or a marginalized group					
Not applicable					
4b. Did you investigate how sex, gender, age, education, income, ethnicity, social standing, or other social determinants impact the health of your target population? What did you do to address these factors (for example: collecting disaggregated data, conducting gendered analyses, considering differential impacts to women, men, girls, and boys, using participatory research approaches, etc.)? How did these approaches influence the results and impacts (e.g. research, policies, and innovations)? Please describe briefly (limit to 1-2 paragraphs per reporting period)					Ind. 6
Year 1					0
Year 2					
Year 3 In the objective 3, in the analysis of the arguments of the trade associations and the food industry against the implementation of warnings labels through public documents, we focused on gender perspective. It showed that the political process is dominated by white men, with limited involvement of women. The place occupied by women in this process is social media, maybe because the nutrition profession is dominated by women, as it is related to food and care. The civil society and the academia must be more present in the political and technical discussions in Anvisa with powerful women amplifying their voices to occupy a space dominated by men.					
5. Did your project include economic analyses/modeling (e.g. costing, cost-benefit analysis, etc.)? If yes, what was the purpose of including these elements and how are they contributing to achieving your project objectives? Please describe briefly (limit to 1-2 paragraphs per reporting period)					Ind. #1
Year 1					0
Year 2					
Year 3 No.					
6. List all peer-reviewed articles that your project has published? Please do not include other types of publications here.					Ind. #11,12
<i>Please list:</i>					Choose an item.
	Title	Journal name	Primary author	Year of Pub.	
1.	<i>Judicialização do processo de revisão do modelo de rotulagem nutricional brasileiro</i>	<i>Revista de Direito do Consumidor</i>	Igor Britto, Nathália Miziara, Laís Mais, Ana Paula Martins	2019	Yes

<p>7. Have individuals involved in your project accomplished one of the following achievements listed below, due in part to their involvement in this project? If yes, please list the name and sex of the individual and describe the accomplishment. Indicate if any of these individuals are Canadian by placing an 'x' in the box labelled 'CAD'.</p> <p>a) received awards and other honours; b) influenced or advised policies; c) expanded the adoption of effective practices, including in new settings/populations; d) other significant achievements</p>						Ind. #10 a, 10b, 10c																																																												
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<p>8. Has your project supported any Masters students, PhD students, or post-doctoral fellows? If yes, please list the name, sex, and nationality of the individuals, and their status as Master's students, PhD students or post-docs. Indicate if any of these individuals are Canadian by placing an 'x' in the box labelled 'CAD'.</p>						Ind. #8,9																																																												
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4.	<i>Por que o Brasil discute mudanças nas embalagens dos alimentos</i>	Why Brazil discusses changes in food packaging	November 3, 2019	https://www.bbc.com/portuguese/brasil-50077227
5.	<i>Anvisa aguarda contribuições da sociedade sobre a nova rotulagem de alimentos</i>	Anvisa awaits contributions from society on the new food labeling	November 4, 2019	https://emails.estadao.com.br/blogs/comida-de-verdade/anvisa-aguarda-contribuicoes-da-sociedade-sobre-a-nova-rotulagem-de-alimentos/
6.	<i>Edição das 10h (A mudança dos rótulos dos produtos pela vigilância sanitária: quais as propostas para padronizar e tornar informações importantes mais visíveis?)</i>	10 am edition (Changing product labels through health surveillance: what are the proposals to standardize and make important information more visible?)	November 5, 2019	https://globosatplay.globo.com/globonews/v/8062765/
7.	<i>Anvisa vai modificar regras de rotulagem dos alimentos</i>	Anvisa will modify food labeling rules	November 5, 2019	https://globoplay.globo.com/v/8061157/
8.	<i>Qual é a melhor rotulagem para os alimentos?</i>	What is the best food labeling?	November 5, 2019	http://radios.ebc.com.br/tarde-nacional/2019/11/qual-melhor-rotulagem-para-os-alimentos
9.	<i>Consulta pública sobre rotulagem nutricional de alimentos. Veja como participar</i>	Public consultation on foods' nutrition labeling. Learn how to participate	November 6, 2019	https://www.em.com.br/app/noticia/bem-viver/2019/11/05/interna_bem_viver,1098639/consulta-publica-sobre-rotulagem-nutricional-de-alimentos-veja-como-p.shtml
10.	<i>Rótulos de alimentos industrializados vão mudar; entenda</i>	Industrialized food labels will change; understand	November 22, 2019	https://veja.abril.com.br/sau-de/rotulos-de-alimentos-industrializados-va-mudar-entenda/

*Main selected reports. Altogether, there were 335 media articles in which Idec and its partners were cited.

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Please complete the relevant sections directly within the FEH database:
<http://ic.idrc.ca/sites/feh/layouts/15/DocIdRedir.aspx?ID=IC16-1689834993-197>

Identify the project as: Gender neutral, Gender sensitive, Gender specific, Gender transformative

- Gender neutral (not applicable): gender is not an operative variable or concept for this project.
- Gender blind: ignored gender variables and did not promote gender equity.
- Gender sensitive: considers gender variables, but does not (yet) involve action to address them.
- Gender specific: acknowledges gender norms, roles and responsibilities and promotes gender-specific improvements.
- Gender transformative: examines, questions and aims to change norms, roles and inequalities toward greater equity

Transformative organizations:

From the organizations involved in this project, indicate which ones were supported to build organizational capacity so that they are now in a position to play a more transformative role in their field or community? Place a check in the 'CAD' column if they are a Canadian organization.

Name of organization	Brief description of the specific means/activities by which the project supported increased organizational capacity	CAD

Contribution to IDRC's development outcomes

If the project contributes in a significant way to one or more of the 3 development outcomes, provide a short description of its contribution below. There is no need to complete this section for all projects, but only those with the most relevant stories that are of interest for the program to highlight.

Health for all:

Economic empowerment:

Gender empowerment:

Do any of the achievements described in this report or in relation to the development outcomes have the potential as a **communications story**? If so, briefly describe: