

Title:

Stakeholders' arguments against and on favor FOP policy: an analyses using the framing framework in Argentina

Authors: Castronuovo L, Guarnieri L, Tiscornia V, Allemandi, L, Pizarro; ME

Introduction

Front-of-pack labeling has grown to be one of the main recommended measures to cope with the global overweight and obesity pandemic. During the last years, high blood pressure, high fasting blood sugar levels, overweight/obesity, in other words, diseases related to nutrition, have increased alarmingly worldwide and have become the three top risks for mortality in the Americas (in 2017 they were responsible for 44 percent of all deaths in this region) (PAHO, WHO: 2020). At the moment, in Argentina, overweight and obesity are the most prevalent forms of malnutrition in all age groups, with 66,1%¹ of overweight people in the adult population (Ministry of Health 2018), whereas 41,1% in the age group between 5 and 17 years and 13,6% for the under-5-years population² (Ministry of Health 2019).

Because of the need to fight these increasing numbers, the recommendations of the WHO and PAHO (FAO OPS WFP and UNICEF 2018, FAO/OPS 2018) have entered Latin American countries' political agendas. In recent years, it has been evidenced that FOPL is a method that makes nutritional information present in the food packaging easily understood by

¹Ministerio de Salud y Desarrollo Social. Secretaria de Salud. Cuarta Encuesta Nacional de Factores de Riesgo. 2018. Disponible en: http://www.msal.gob.ar/images/stories/bes/graficos/0000001622cnt-2019-10_4ta-encuesta-nacional-factores-riesgo.pdf.

²Ministerio de Salud y Desarrollo Social. Secretaria de Salud. Segunda Encuesta Nacional de Nutrición y Salud; 2019. Disponible en: http://www.msal.gob.ar/images/stories/bes/graficos/0000001602cnt-2019-10_encuesta-nacional-de-nutricion-y-salud.pdf

consumers and this system allows them to make healthier consumption choices (Hawley, Roberto et al. 2013).

Several countries in the region have already implemented front-of-pack labeling systems: Ecuador, Perú, México, Chile, Uruguay and Brazil (Nourishing Framework, 2018, Díaz, Veliz et al. 2017, Corvalan, Reyes et al. 2019). However, the “political process”, the process that takes from the formulation to the implementation of public policies (refe), has been obstructed by the severe pressure exerted by the food industry against the regulation of FOPL policies. Corporations have delayed their implementation and even achieved to modify the law projects (Perez-Escamilla, Lutter et al. 2017), even though there is scientific evidence that shows how the proposed policies improve the consumers’ understanding of the nutritional information of the food they are consuming (Arrúa, Curutchet et al. 2017, Arrua, Vidal et al. 2017, Freire, Waters et al. 2017).

The several actions displayed by the industries, “corporate political activity”, have the purpose of obstructing different health promotion policies in favour of their economic interests. The different analysis conducted (Mialon et. Al, 2018, 2017, 2016) show that the discursive practices are highly powerful among the actions carried out by the corporations and the other actors involved in the policy process, such as different actors within the state and interest groups. In the study of these processes, it is indispensable to understand the bureaucracy, and evidence how the different actors structure or distort the political process of a policy by constructing their own narrative and a series of arguments (Parsons, W, 2007).

In the specific case of Argentina, great advances had been made regarding the FOPL policies. In October 2020, the National Senate gave half a sanction to a law project that incorporates the graphic system of warnings with black octagons and the PAHO's nutrient profile model (cita Proyecto de ley). Nevertheless, the process has not been exempt from the intervention of food and non-alcoholic beverage industries: these corporations displayed a series of actions during the FOPL political process similar to the ones observed in those of the countries of the region that advanced on the policies.

This investigation takes place within the Project "Front-of-package labelling (FOP): a collaborative regional study with countries members of the Common Southern Market (MERCOSUR)". Its main aim is to generate evidence to promote effective FOPL policies in Brazil and Argentina. In order to do so, the general objective of this research consists in analyzing and documenting the arguments used in favor and against the promotion of the front-of-pack labelling systems in general and of the political discussion of the warning system policy in Argentina during the period 2017-2018 in particular.

The starting point of this study consists of a constructivist and interpretive approach of the political process of the FOPL policy in Argentina in which the actors, their positions and narratives are highly relevant. The theoretical framework that guides this investigation links the perspective of the political processes with the framing theory that postulates that, in the news texts, the reality is framed through the selection and prominence (salience) of specific aspects that are intended to be reported (Eantman, 1993).

This framework for the analysis is considered pertinent for this investigation because it allows the association of different elements present in the narratives that appear enounced by the different actors. It allows the identification of elements that are emphasized and the implications that this strategy has in the political process of the FOPL policy. The elements used for the analysis of news articles in this framework adapt to the object of study of the investigation, which consists of understanding the different actors, the positions and narratives that conform the political space.

The specific objectives of this study include: to analyze which are the main arguments to oppose and to support the front-of-pack labelling policy in Argentina; to describe which actors are represent these positions and which sectors they belong to; to identify the differences that can be pointed out in the narratives of the different actors; to analyze which alternative systems to the front-of-pack labelling have been proposed in Argentina and what arguments have been used to impulse alternative systems to front-of-pack labelling.

Methods

We followed a cross-sectional analysis to study and analyze different speeches on the FOPL policy. The unit of analysis are the speeches enounced by the different actors. These are selected as fragments of text that contain declarations about the benefits and prejudices of the front-of-pack labelling policy (Lie, Fooks, de Vries, Heijndijk, & Willemsen, 2017). Both the speeches supporting arguments for and against the policy were analyzed for a better understanding of the political process.

We based our analysis on the category of framing presented by Eantman (1993). The frames refer to the way in which the information is presented in order for the receptor to apprehend it easily by associating it to familiar cognition schemes. In a text, to frame is to select some aspects of a perceived reality and turn them more prominent in a way that it promotes a particular definition of the problem, a causal interpretation, a moral evaluation and/or a treatment recommendation for the described fact/matter.

Data collection was conducted from August 2017 to December 2020. The starting point coincides with the first meeting of the sub-commission of food labelling in the context of the Commission of Healthy Alimentation of the National Ministry of Health, presided by the Director of Health and Control of Non-Communicable Disease. The date was selected because the creation of this sub-commission is considered the entrance of the FOPL policy in the Health Ministry's Agenda. The named commission is multi-sectoral and integrated by representatives of different Ministries, academical organizations, the food industry and other civil society organizations. The finishing date for the data collection, December 2020, was established taking into consideration the end of the same legislative year. This way, the data collection allows the approach of the highest number possible of newspaper articles in which the different actors have made declarations about the law project approved in the National Senate.

Sources of information/data collection

The final corpus is composed by 941 documents:

- 10 law projects on the front-of-pack labeling that had parliamentary status at the starting date of the data collection.

- 3 memorandums of the meetings held in the sub-commission of labelling in the context of the National Commission for Healthy Alimentation, with the participation of actors belonging to different sectors (academia, food industry, civil society, etc.)

- 1 stenographic transcript of a session of the Health Commission of the National Senate in which the presented projects of FOPL were discussed.

- 927 newspaper and magazine articles that present the voice of the different actors in regards the FOPL and the best labelling systems that should be implemented. FIC Argentina has a service of news clipping that collects from press and online media the articles that deal with topics relevant for the institution's agenda. This service includes 14 newspapers and 17 general interest' magazines distributed nationwide, 32 provincial newspapers and 5 provincial magazines, 68 magazines that concern the organization's scope and 1.528 online portals. In the present investigation, articles that coincided with the following search terms were included: "frontal package" OR "nutrient profiling system" OR "food label" OR "food labelling" OR "etiquetas de alimentos" OR "rotulado de alimentos".

Data analysis

The selected analysis strategy combined a deductive and an inductive logic. First, a preliminar codebook was elaborated based on a literature search in PubMed of incised articles that analyzed the arguments used by the tobacco or alcohol industry to oppose different types of public health policies. The terms of the search that were used are: arguments + tobacco industry & arguments + alcohol industry & arguments + food industry. Given that there is evidence that shows that the industry of unhealthy products use the same “playbook” (Brownell & Warner, 2009), it was considered pertinent to identify codes and categories that had been used and evaluate their pertinence for the analysis of this case. In addition, for the elaboration of the preliminar codebook, a non systematic revision of news articles about FOPL was conducted and agreed on among the research team that codified the corpus of documents.

The present investigation prioritizes the inductive logic, therefore, the first codebook was used as a study hypothesis and was refined during the investigation through a thematic analysis that allowed the modification of the executed codes that resulted from an iterative process. This type of approach has been used in similar studies (Lie, et al., 2017).

The data analysis combined the Atlas.ti software and manually through a matrix designed especially for this in Microsoft Excel (figure 1). The coding of data was conducted by five investigators, who held periodical meetings to discuss the codes and categories, point out doubts and improve the codebook. The discrepancies among the research team were solved in group meetings. A sub-sample (n=80) was codified by two codifiers in order to guarantee

the use of the same criteria, and this type of strategy allowed to maximize the reliability of the findings.

Once the information was coded, the identified speeches were grouped into 24 themes and 3 frames, following the framing theory (Eantman 1993).

Results

Different arguments were identified and grouped in themes for each one of the frames. The frames were established in relation to the linings of Eantman (1993): A. Definition of the problem: in this case, it refers to the way in which the obesity/malnutrition phenomenon is described. B. Support of the solutions or improvements: the description of the policies that should be implemented to fight obesity in general and the importance assigned to the FOPL policies. Moreover, the role that the different actors affected by this subject should have is described. The policy of FOPL that will be implemented is identified and the things it “should” include and avoid are pointed out. C. Moral evaluation: the position that the different sectors have towards the implementation of a warning labeling system is identified.

The intervening actors present in the corpus of analyzed texts are identified as authorized spokesmen in the media to suggest a front labeling system and pointing out the principal challenges that this policy will present for the prevention of overweight and obesity. In addition, they are quoted in the arguments presented in the justification of the law projects.

By analyzing all of the arguments, public and private actors are identified as well as individual actors, in some cases, specially nutritionists, doctors, periodists, cooks and other actors that are spokesman of a specific organization.

So as to the number of arguments found, in the first place is the food industry (n=94), that is represented in the source of information analyzed by the Chamber of Alimentary Industries, the Coordination of Alimentary Products and the Argentinean Sugar Centre in most of the documents. In a smaller number, there are also the industries of specific food products (e.g.: Pepsi).

On the second place, the organizations of civil society connected to health (n=83), including a heterogeneous group of organizations that gather health professionals or organizations that promote policies for the prevention of overweight and obesity. Among the health professionals that are spokesman to the different organizations, there is a big percentage of nutritionists but also doctors, pediatricians, chemists that study the mechanisms of satiety and anthropologists specialized in nutrition.

On the third place, independent health professionals (n=97) who, from the advances of the debate of FOPL in the Congress, have been interpellated by the tematic and have manifested their position, both for and against the policy. This group is composed mainly of doctors and nutritionists.

In the fourth place there are the decision makers (n=72), whose arguments acquired a big protagonism as from the advances of the policy in the Legislative Power, mainly, those

positions presented in the sessions of the Senator's Chamber that had a big repercussion in different media. In this case, most of the identified speakers are national senators.

The fifth place as to the number of arguments analyzed is represented by the Health Ministry (n=59). The spokesmen are both the National Health Minister and the Director of Noncommunicable Chronic Diseases of the Health Ministry.

The group of international experts is composed of economists, doctors and civil society leaders that are considered references in the study of policies of noncommunicable chronic diseases prevention.

The decision makers are mentioned in the law projects analyzed and in the stenographic transcript, not having much relevance in the press texts.

Diagnosis of the situation

The way in which the actors define the conditioning factors or the causes of the overweight and obesity epidemic is highly relevant for this analysis because their political priorities can be identified within their definitions of the epidemic's source. In this case study, the way in which the different actors define the actual situation is analyzed according to two dimensions: A. Diagnosis of the epidemiological situation regarding overweight and obesity; B. the principal cause of the epidemic.

In all the data analyzed, a consensus can be observed by all the actors in the understanding of overweight and obesity as a big problem for public health. However, the

different actors emphasize different aspects as the sources of this epidemic. On the one hand, the food industry insists on defining obesity as a multifactorial problem that demands the implementation of a pack of policies that include educational initiatives and the foment of physical exercise.

“a multifactorial problem –that is obesity and overweight– demands an integral approach: initiatives of nutritional education, promotion in the adoption of healthy habits as physical exercise, among others” (Food Industry)

In other cases within this sector, the importance of FOPL as a secondary approach is stated, putting the focus on the necessity of improving the variety of the food consumed by the population.

“While it is important that people know what they are consuming, a much more varied diet is needed ” (Food Industry)

On the other hand, the speakers belonging to the health sector, including civil society organizations, the Health Ministry and international organisms, point out that the problematics of overweight and obesity are associated to the consumption of ultra processed products and that obesity should be perceived as an epidemic of social character that requires population policies of prevention.

“There has to be a regulation in the offer of food over the ultra processed products and the sugar-beverages, that are the principal determinants of obesity in all the population and

particularly in children and adolescents, that are the most vulnerable and passive sector to the
publicity bombarding” (UNICEF).

However, some health professionals do not agree on focusing on the excessive consumption of critical nutrients. Their arguments emphasize on the sources of the overweight and obesity epidemic being the low consumption of healthy products.

“The bad quality of the diet that we have is due to the low consumption of vegetables, fruits, dairy, integral cereals and grains. Also to the high consumption of bread, high aggregate of sugar to infusions” (Health professional)

a. Policy recommendations

The different actors belonging to the health sector (Health Ministry, PAHO, civil society organizations associated to health) agree that the FOPL must be one of the main measures and allow the design of other policies in a pack of integral regulatory policies that regulate obesogenic environments, that should also include measures such as taxes on sweetened beverages, unhealthy food marketing restriction and healthy school environments.

“The promotion of this environments together with other policies such as front of package labelling in food and restrictions in the publicity of products of low nutritional quality conform a package of measures that the states must implement to prevent and control the epidemic of childhood obesity” (Organizaciones de la sociedad civil vinculadas a la salud)

For these actors, the objective of the FOPL policy is to grant consumer rights, from a health and consumers perspectives, as it contributes to the access of adequate nutrition and information for consumers.

“WHO, PAHO and SAP (Sociedad Argentina de Pediatría) also promote the access to clear information about the foods through the measures as the FOPL, that warn the consumers about the excess of sugar, fats and salt to protect the right of consumers to choose what they prefer for their kids.” (International Organisms-Science Society)

In addition, actors associated with the government agree on the necessity of understanding the FOPL as part of a package of integral measures where the FOPL is a fundamental policy to implement others to regulate the nutritional environment.

“The objective of the plan is to favour a healthy nutrition and, in that frame, to incorporate the establishment of regulations, like the FOPL, that is part of the plan, and is the entry door to other regulatory policies, like healthy school environments or the publicity regulation. There is a lot of consensus in the idea that FOPL is the most appropriate instrument for this” (Ministerio de Salud)

Nevertheless, within the health sector there are also professionals that point out that the FOPL policy must not be prioritised in the fight against the overweight and obesity epidemic. The FOPL policy is presented by these actors as a policy of limited efficiency compared to other initiatives to solve the malnutrition problem in the country.

“The 70% of what we eat would not be impacted by the labelling (...) Therefore, it is necessary to adopt convergent measures to improve the diet of the population.” (Health professional)

In contrast, the food industry highlights the need for health education, particularly the need of developing actions on nutritional health. The arguments used by the food industry place these educational policies in a central place in the prevention of overweight and obesity and prioritize these actions compared to the FOPL.

“These types of actions in isolation do not achieve to solve the problem of obesity and overweight. It is a necessary measure but it is not enough. The nutritional education is the action that can make the difference in the nutritional habits” (Industria de alimentos)

The FOPL policy is seen by some actors (particularly those associated with the food industry) as secondary to a policy of population awareness. These actors point out that for the FOPL to be effective, the population must acquire knowledge on how to read the food labels. The food industry mentions repeatedly that the main objective that a FOPL policy should have is the education of consumers. For this actor, the policy must enable the consumers to make the healthier choice and give them information to select the products with the best nutritional quality but do not “dissuade” them from consuming a specific product.

“The information and education are fundamental stages in this process, therefore the importance for the consumer to have access, in the front part of the packages, to the

nutritional data and information exposed in a simple and clear way, that allows him to make consistent decisions and that encourages him to seek for a healthier diet” (Food industry).

b. FOPL policy: recommendations of the policy process that involves the design of the policy

The food industry emphasizes the idea that a FOPL policy must arise from the agreement between different actors. They highlight the necessity of the participation of the food industry within these discussions and state the gradual or progressive application of a FOPL policy as a condition for its implementation.

“The business centers of the Mercosur are in favour of progressive, reasonable, concentrated policies, tendent to focus these issues in the part that corresponds”. (Food Industry)

The food industry indicated that it is important for them to participate and be consulted in the formulation of the policy, showing the examples of previously implemented policies in Argentina in which work was firstly done voluntarily (autoregulation) and after that the normative was implemented.

“We work on three principal axes: first, we do not believe that it must only be a government decision, there must be a consultation with the private sector to work together. We have already done it with trans fats or in the campaign for sodium consumption” (Food industry).

This vision of the industry is opposed by health professionals that argue that the food industry should not be included in the design of the policy for having different interests to those of granting the population's health.

“These are measures that must be impulsed from a health policy and should not be consensuated with the food industry that seeks fundamentally for rentability” (Professional of health)

When they describe the policy process that must guide the implementation of these policies, not only they argue for the need for the participation of different sectors of society (private sector, NGOs, etc.) but also the need to include different government actors. Actors from the government highlight that the FOPL policy must be discussed among different organisms that involve the areas associated with health as well as industry and commerce.

“We understand that the state policies should be generated in a dialogue space, generating an intersectoral work where we can understand each other and put ourselves in their place (...) the frontal labelling of food is just another instrument to achieve the objective of reducing obesity. The cultural changes take time and are deeper transformations” (Ministry of AgroIndustry).

From the food industry, the Mercosur is pointed out as a place to hold the discussion of the policy. They argue that there could exist commercial barriers if the policy is implemented in the countries instead of being approved by the regional block. The barriers for potential tariffs

are mentioned as obstacles for the implementation of the policy of a national scale. This argument appears recurrently by spokesmen of the main camera that represents the sector.

“In second place, we believe that it should not be treated as a subject on national level, but within the Mercosur. If each country has a different label, intrazone commerce does not exist, para-tariffs are being fixed. The Mercosur is the place and governments are recognizing it. From the private sector of the intrazone countries there is consensus and we want to articulate with the public sector in the adoption of a new labelling” (food industry).

The arguments to declare that the discussion must be held in the Mercosur are not only based on economic reasons, but also in juridical ones. In the frame among the different sectors that was held in Intersectorial Tables called by the Ministry of Health to discuss the FOPL policy, actors associated to discuss the FOPL policy, actors associated to the food cameras that have pointed out that it is the need to respect the space of Mercosur as a frame for the discussion to respect the “hierarchy of norms” (Comision’s meeting).

In addition, the food industry underlines the necessity that the implementation of the FOPL policy is coherent with other international instruments, such as the Codex Alimentarius.

“The proposal on the package labelling must count with scientific support that fundamentals the criteria established by the Codex Alimentarius” (Food Industry)

c. Recommendation on the objective of the policy

The identified actors highlight different objectives that must follow the implemented FOPL policy. Different actors of the health sector, government actors and decision-makers underline that the FOPL must be a tool that allows to fight against obesity and that sends a message to the industry so that it reformulates its products.

[The FOPL policy will contribute to “prevent not only overweight and obesity but also non transmissible diseases related directly to them” like diabetes, arterial hypertension, cardiovascular diseases, strokes, chronic renal diseases and cancer] (Provincial decision-maker).

The labelling is not only a message directed to consumers, but also to the industry “so that it starts to think about the reformulation of their products” (Ministry of Health).

Diverse actors associated with health point out that frontal labelling has as an objective to grant rights to consumers: grant the right of consumers to information and adequate nutrition.

[The access to clear information on food is also key, through measures like front of label, that warn consumers on the excess of sugar, fats and salt to protect the right of consumers to choose what they prefer for their children] (International organisms).

In opposition, the food industry points out that the front labelling should provide consumers with information to select a healthier diet and contribute to their education. The systems of food labelling with warning stamps are visualized as the opposition to a policy of labelling that has as an objective the consumer’s education as they “demonize” the products.

“From the COPAL (Coordinator of Industry of Food Products), as they consider the nutritional labelling should respond to the objective of education, not prohibition or demonization of consumption of a food or beverage, as suggested by some models” (Food industry)

d. Recommendations on the type of front of label system to implement

The health sector, that includes health professionals and different organisms, identifies different recommendations of FOPL policies to implement. Different actors highlight the importance of a labelling system that gathers the characteristics that allow to call the

consumer's attention and does not confuse him, mentioning that the system should be "clear and simple".

"The frontal labelling should offer information that is simple, visible and easily understandable, a frontal labelling that warns clearly which are the food products that are high in critical nutrients will allow to understand rapidly what products are prejudicial to the health" (Ministry of Health)

Nevertheless, within the health sector we can observe different postures in relation to the characteristics that should have the system to apply. On the one hand, there are those that point out that it is necessary to develop a system that includes both the positive and negative nutrients. On the other hand, there are those health professionals that focus on the necessity that the labelling system identifies the critical nutrients. There are those that promote the adoption of a warning system (OPS-Ministry of Health-NGOs and decision makers that support these projects).

"The State must impulse the warning front labelling of high values of sodium, sugars, fats, among others, that if we want to fight the obesity should not be consumed" (decision-maker)

In addition, different health professionals have independently manifested their position, especially since the advances in the law project discussion held in the Congress in 2020. In various cases, they are actors that propose alternatives both on the graphic warning model and the nutrients profiling system of the PAHO, showing their unconformity to these aspects included in the norm.

"It is necessary to adopt a frontal labelling that is simple, easy, understandable, but the system of black stamps is not the best: it has little sanitary impact because it leaves out half of what we consume" (Health professional)

The health professionals that underline the need for a system that includes positive and negative nutrients promote the implementation of the NutriScore system, a labelling system of voluntary implementation in France that, through a score system that takes into consideration both negative and positive nutrients, classifies the food products in five letters that also represent five different colours. This group contemplates this system more advantageous than the other labelling systems proposed, because they consider that it brings more information to consumers. In addition, this system is considered to be more effective and these health professionals argue that there are studies that show its superiority in relation to the other systems.

“What is of value in the french system is the total score, translated to labels with five possible colours that go from green to red. One (the chilean labelling system) puts the focus in the exclusion, and other (the french labelling system) in education” (Health professional)

Facing this proposal, other actors identify that the front labelling system of NutriScore is not as useful a tool to prevent overweight and obesity because the positive nutrients “attenuate” or “compensate” for the prejudicial effect of the nutrients that are critical for health.

“The NutriScore compensates the positive attributes with the negative ones of the product and, for example, if it has high contents of sugar but it has fibers, the orange colour in the scale will be highlighted; it gives the consumer digested information and it really does not inform on the presence of critical nutrients; evaluated the functionary, who synthesized that other studies on the topic concluded that the human brain cared for the red colours; yellow and green are interpreted as similar” (Ministry of Health)

The food industry promotes a type of front labelling that is “indicative” and not “disuative”, identifying that the informative systems that have major presence in the world that the warning ones and, that these last ones “stigmatize” the food products.

“The preoccupation from the CIPAN and the Copal is that the labels will be disuative and repercute negatively in the sector. We believe that we should go to indicative

forms and not to forms of demonization nor warning nor prohibitive because all the food is good, what matters is the quantity and quality of life, mainly in countries as ours”(Food industry)

This sector proposes on different occasions the implementation of “traffic light” or “GDA with colours' '. This front labelling system indicates the quantity of critical nutrients that the product has and points out with different colors each one of the nutrients according to if it traspases or not the threshold established by the nutrient profiling system. The food industry underlines that there is evidence that supports this system.

According to the results of the polls (in which GDA with colours was evaluated), 8 of every 10 consumers have considered that the mentioned labelling is easier to understand and that it can be of great utility to rapidly evaluate the nutritional content of food and beverages (Food Industry).

On the contrary, different actors belonging to international organisms, NGOs and from the government oppose this system of front labelling for considering there is not enough supporting scientific evidence available, as well considering the system to be confusing for consumers and not effective. More than 20 studies in the whole world show the difficulties the consumers have understanding the system and they show it does not modify the buying patterns. This is an effect of the amount of information it offers and, as well, due to the fact that the same product can have red and green stamps at the same time. It was evidenced that, at the moment of the buy, the consumer tends to choose a product because it has a green label. (Ministry of Health)

Nevertheless, the health professionals sector were also spokesmen in favour of the proposal treated in the Legislative frame and highlight that the adopted policy should allow the consumers to count with clear and simple information as well as underlining the scientific evidence that supports the standards and experiences of countries in the region that have advanced in the same direction.

“The advantages of this labelling (warning system) are: it brings clear information and allows the reading in a practical way, which makes us to take the decision of buying or not a product or replace it for other”(health professional)

Discussion

The present work allows the analysis of the speech of different actors that exceed the food industry in order to show the complexity of the political space in which the policy is being discussed. Within this space, the health sector presents voices with different perspectives. This way, it is important to identify the actors that may have conflicts of interest and that present arguments that answer to the food industry's interests within the health sector.

The food industry presents an argument where the causes of the problem are clearly shown as a multifactorial and complex problem and say that it is a priority to educate the individuals. The solutions, for the food industry, are necessary policies that address mainly in providing the individual consumers with elements to select the food products. The position of this sector on the warning FOPL is that the system does not provide information and that it “demonizes” the products. The investigation's results agree with previous studies that evidence that the food industry presents an homogeneous and recurrent speech that is centered in the idea of demonization, the complexity of the problem and the relevance of the nutritional education as a an approach to fight the obesity and overweight epidemic (Petticrew y col, 2017).

In opposition, the health sector shows different positions that, in some cases, contradict each other concerning the different systems of FOPL (warning system vs. Nutriscores). These different voices give different amounts of emphasis to the excess of critical nutrients consumption as one of the sources of the overweight and obesity epidemic. The lack of agreement in aspects such as the FOPL system that must be implemented or the relevance of

centering the policy in the critical nutrients by actors that represent the health sector represents an obstacle for the implementation of effective policies.

The presence of actors with different positions and interests in the public sphere hinders the implementation of the policies and evidences the necessity of clear conflict of interest policies that provide a frame to avoid the interference of the food industry in the promotion of policies that grant access to health. Although intersectionality can be considered positive by ensuring the representation of different actors in the implemented policies, it is also necessary to guarantee that the interests of public health guide de discussions that concern public health.

The analyzed arguments/texts for the Argentinean case have been also identified in studies that took place in the FOPL in other countries, showing how the food industry replicates its actions. This allows the identification of regional strategies that obstruct the development of effective health policies. In addition, similarities among the arguments supported by part of the food and tobacco industry can also be recognized. The legal controversies, the negative economic consequences and the ineffectiveness of the measure are all arguments that have been identified in studies that analyze the discourse of the tobacco industry (Lie, 2017) and that can also be observed in this analysis.

This evidence is consistent with the studies that underline the way in which different corporations use the same “playbook” (Brownell, 2009) to oppose the implementation of the policies.

Bibliography

- Arrúa, A., M. R. Curutchet, N. Rey, P. Barreto, N. Golovchenko, A. Sellanes, G. Velazco, M. Winokur, A. Giménez and G. Ares (2017). "Impact of front-of-pack nutrition information and label design on children's choice of two snack foods: Comparison of warnings and the traffic-light system." *Appetite* **116**: 139-146.
- Arrua, A., L. Vidal, L. Antunez, L. Machin, J. Martinez, M. R. Curutchet, A. Gimenez and G. Ares (2017). "Influence of Label Design on Children's Perception of 2 Snack Foods." *J Nutr Educ Behav* **49**(3): 211-217.e211.
- Brownell, K. D. and K. E. Warner (2009). "The perils of ignoring history: Big Tobacco played dirty and millions died. How similar is Big Food?" *The Milbank Quarterly* **87**(1): 259-294.
- Díaz, A. A., P. M. Veliz, G. Rivas-Mariño, C. V. Mafla, L. M. M. Altamirano and C. V. Jones (2017). "Etiquetado de alimentos en Ecuador: implementación, resultados y acciones pendientes." *Revista Panamericana de Salud Pública* **41**: e54.
- FAO OPS WFP y UNICEF (2018). *Panorama de la seguridad alimentaria y nutricional en América Latina y el Caribe 2018*. Santiago

- FAO/OPS (2018). "Políticas y programas alimentarios para prevenir el sobrepeso y la obesidad. Lecciones aprendidas."
- Freire, W. B., W. F. Waters and G. Rivas-Mariño (2017). "Semáforo nutricional de alimentos procesados: estudio cualitativo sobre conocimientos, comprensión, actitudes y prácticas en el Ecuador." Revista peruana de medicina experimental y salud pública **34**: 11-18.
- Hawley, K. L., C. A. Roberto, M. A. Bragg, P. J. Liu, M. B. Schwartz and K. D. Brownell (2013). "The science on front-of-package food labels." Public Health Nutr **16**(3): 430-439.
- Hersey, J. C., K. C. Wohlgenant, J. E. Arsenault, K. M. Kosa and M. K. Muth (2013). "Effects of front-of-package and shelf nutrition labeling systems on consumers." Nutr Rev **71**(1): 1-14.
- Hodgkins, C., J. Barnett, G. Wasowicz-Kirylo, M. Stysko-Kunkowska, Y. Gulcan, Y. Kustepeli, S. Akgungor, G. Chrysochoidis, L. Fernández-Celemin and S. S. genannt Bonsmann (2012). "Understanding how consumers categorise nutritional labels: a consumer derived typology for front-of-pack nutrition labelling." Appetite **59**(3): 806-817.
- Lie, J. L. Y., Fooks, G., de Vries, N. K., Heijndijk, S. M., & Willemsen, M. C. (2018). Can't see the woods for the trees: exploring the range and connection of tobacco industry argumentation in the 2012 UK standardised packaging consultation. Tobacco control, **27**(4), 448-454.
- Mialon, M. and J. Mialon (2017). "Corporate political activity of the dairy industry in France: an analysis of publicly available information." Public health nutrition **20**(13): 2432-2439.
- Mialon, M. and J. Mialon (2018). "Analysis of corporate political activity strategies of the food industry: evidence from France." Public health nutrition: 1-15.
- Mialon, M., B. Swinburn, S. Allender and G. Sacks (2016). "Systematic examination of publicly-available information reveals the diverse and extensive corporate political activity of the food industry in Australia." BMC public health **16**(1): 283.
- Mialon, M., B. Swinburn and G. Sacks (2015). "A proposed approach to systematically identify and monitor the corporate political activity of the food industry with respect to public health using publicly available information." Obesity reviews **16**(7): 519-530.
- Mialon, M., B. Swinburn, J. Wate, I. Tukana and G. Sacks (2016). "Analysis of the corporate political activity of major food industry actors in Fiji." Globalization and health **12**(1): 18.
- Ministerio de Salud. (2018). "Cuarta Encuesta Nacional de Factores de Riesgo para Enfermedades No Transmisibles." Fecha de acceso: Agosto 2019, from http://www.msal.gov.ar/images/stories/bes/graficos/0000001622cnt-2019-10_4ta-encuesta-nacional-factores-riesgo.pdf
- N. M., Thomas, J., & Weishaar, H. (2017). 'Nothing can be done until everything is done': the use of complexity arguments by food, beverage, alcohol and gambling industries. J Epidemiol Community Health, **71**(11), 1078-1083.
- Nourishing Framework (2018). Nutrition label standards and regulations on the use of claims and implied claims on food.
- Parsons, W. (1996). Public Policy: An Introduction to the Theory and Practice of Policy Analysis, Edward Elgar Publishing.
- Petticrew, M., Katikireddi, S. V., Knai, C., Cassidy, R., Hessari, N. M., Thomas, J., & Weishaar, H. (2017). 'Nothing can be done until everything is done': the use of complexity arguments by food, beverage, alcohol and gambling industries. J Epidemiol Community Health, **71**(11), 1078-1083.
- Perez-Escamilla, R., C. K. Lutter, C. Rabadan-Diehl, A. Rubinstein, A. Calvillo, C. Corvalan, C. Batis, E. Jacoby, S. Vorkoper, L. Kline, E. Ewart-Pierce and J. A. Rivera (2017). "Prevention of childhood obesity and food policies in Latin America: from research to practice." Obes Rev **18 Suppl 2**: 28-38.

- Secretaría de Gobierno de Salud de Argentina (2018), Etiquetado Nutricional Frontal de Alimentos. Disponible en: http://www.msal.gob.ar/images/stories/bes/graficos/0000001380cnt-2019-06_etiquetado-nutricional-frontal-alimentos.pdf
- Waa, A. M., J. Hoek, R. Edwards and J. Maclaurin (2017). "Analysis of the logic and framing of a tobacco industry campaign opposing standardised packaging legislation in New Zealand." Tobacco control **26**(6): 629-633.