A REPORT BY
CONSUMER COUNCIL OF FIJI

CONSUMER COUNCIL OF FIJI

LABEL LOGIC

HOW EFFECTIVE LABELLING POLICIES CAN INFLUENCE BETTER CONSUMER CHOICES IN FIJI

ABSTRACT

Fiji is experiencing a growing burden of non-communicable diseases (NCDs), including obesity, diabetes, cardiovascular diseases, and hypertension. These health challenges are largely driven by unhealthy dietary habits, which have been influenced by a shift from traditional diets to an increased reliance on processed and imported foods. Many of these processed foods are high in sugar, salt, and unhealthy fats, yet consumers often struggle to make informed choices due to the lack of clear and easily interpretable nutritional information on packaging. While the Food Safety Act 2003 and Food Safety Regulations 2009 mandate nutrient labelling, the information provided is often complex and difficult for the average consumer to understand. Furthermore, there is currently no regulatory framework for Front-of-Pack Labelling (FOPL) in Fiji, which limits consumers' ability to make quick, health-conscious purchasing decisions.

FOPL is a globally recognized tool designed to enhance consumer awareness by providing easy-to-read nutritional information on packaged foods. Various countries have successfully implemented FOPL systems to help consumers compare products and make healthier choices. Notable examples include Australia and New Zealand's Health Star Rating system and the United Kingdom's traffic-light labelling scheme, both of which simplify complex nutritional data into clear visual indicators. These systems have proven effective in guiding consumers towards healthier diets and encouraging food manufacturers to reformulate products with improved nutritional profiles.

This study assesses the feasibility of introducing a voluntary FOPL guideline in Fiji, drawing insights from international models and stakeholder feedback. Through market surveys, stakeholder consultations, and policy analysis, this study identifies key challenges and opportunities associated with implementing FOPL in the Fijian context. The findings highlight a significant gap in consumer understanding of nutritional labels and a widespread absence of FOPL on locally produced and imported goods. Given the increasing public health concerns, there is a pressing need to develop a standardized FOPL system tailored to Fiji's food landscape.

A phased approach to FOPL implementation is recommended, starting with voluntary guidelines for businesses, accompanied by public awareness campaigns to educate consumers on how to use the labels effectively. Over time, these voluntary measures could transition into mandatory regulations, ensuring that all pre-packaged foods display clear nutritional information. Such an initiative would align with Fiji's broader public health objectives and contribute to reducing the prevalence of diet-related NCDs. Collaboration among policymakers, businesses, and consumer advocacy groups will be essential to ensure the successful adoption and sustainability of FOPL in Fiji.

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MESSAGE FROM THE CEO

SEEMA SHANDIL

CEO Consumer Council of Fiji

At the Consumer Council of Fiji, our mission is grounded in empowering consumers to make informed choices that lead to healthier, safer, and more sustainable lives. In today's dynamic food environment, consumers are faced with a growing array of packaged food products,many of which come with complex nutrition information that can be difficult to interpret. This makes clear and accessible labelling more important than ever.

This report on Front-of-Pack Labelling (FOPL) represents a significant step forward in our efforts to promote transparency in food packaging and improve public health outcomes. Our research, supported by extensive consumer surveys and engagement with key stakeholders across the manufacturing and distribution sectors, reveals critical insights.

One of the most striking findings is that more than 99% of consumers we surveyed believe that FOPL would help them make healthier food choices. This overwhelming support signals a strong public demand for clearer, more user-friendly nutritional information, especially at a time when non-communicable diseases continue to rise in Fiji.

Equally important are our discussions with food manufacturers, distributors, and importers. These industry stakeholders largely indicated a willingness to explore voluntary FOPL guidelines and acknowledged the potential positive impact of FOPL on product marketability and consumer trust.

This initiative is not about regulation for regulation's sake—it is about working collaboratively to develop voluntary guidelines that are practical, consumer-centric, and aligned with best practices from around the world. Our goal is to equip Fijian consumers with simple, visual tools that guide healthier food decisions—tools that can make a real difference at the supermarket shelf.

As we continue this important work, I extend my gratitude to all our partners, survey participants, and the dedicated team behind this project. We look forward to further engagement with industry, government, and civil society to ensure that food labelling in Fiji evolves to meet the needs of every consumer—regardless of age, literacy level, or background.

Let us take this opportunity to shape a future where informed choice is not a privilege, but a right for every Fijian.

> “
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> ”

MESSAGE FROM THE MANAGER CAMPAIGNS INFORMATION AND MEDIA

The Front-of-Pack Labelling (FOPL) initiative has been a deeply rewarding and enlightening journey for the Council's Research and Policy Division. Through this project, we set out to better understand the existing gaps in consumer knowledge, the effectiveness of current food labelling practices, and the readiness of industry stakeholders to support a more transparent labelling system.

What emerged from this study is a nuanced picture of Fiji's packaged food landscape. Our engagement with manufacturers, distributors, and importers revealed a broad spectrum of practices—some already aligned with best practices, others requiring substantial support and guidance to improve. While all businesses acknowledged existing legislative requirements such as those under the Food Safety Act 2003, there remains a lack of uniformity in how nutritional information is presented and interpreted.

Moreover, our survey found that a significant number of consumers either do not read nutrition labels or find them difficult to understand. Yet, once introduced to the idea of simplified front-of-pack symbols, they expressed strong support for the concept. This reveals both a challenge and an opportunity: a challenge in bridging the literacy and awareness gap, and an opportunity to introduce labelling solutions that meet people where they are—visually, cognitively, and practically.

> *"there remains a lack of uniformity in how nutritional information is presented and interpreted."*

ZIYAD PARVEZ

Manager Campaigns Information and Media

One key observation from this project is the willingness of many businesses to engage in voluntary action. This opens the door for collaborative pilot programs, phased implementation models, and co-created labelling formats that suit both industry capacities and consumer needs.

We also observed disparities in the types of products covered by businesses surveyed—from snacks and beverages to frozen and processed foods—highlighting the need for adaptable guidelines that can accommodate product variation.

This project serves as an important foundation for evidence-based policy development in Fiji. It gives voice to both consumers and suppliers, and more importantly, it lays the groundwork for a proactive, voluntary, and inclusive front-of-pack labelling framework that puts health first without compromising business viability.

I extend my appreciation to the research team, our respondents, and all stakeholders who contributed their time and insights. As we move forward, we remain committed to translating this work into action that benefits every Fijian household.

INTRODUCTION

Non-communicable diseases (NCDs) have become the leading cause of mortality and morbidity in Fiji, accounting for over 75% of all deaths annually (Fiji Ministry of Health, 2022). The rising prevalence of obesity, diabetes, and cardiovascular diseases has been closely linked to dietary shifts towards processed and imported foods high in sugar, salt, and unhealthy fats. In this context, food labeling has emerged as a critical policy tool for empowering consumer choice and encouraging healthier eating patterns. However, Fiji's current food labeling regulations, last updated in 2009, have failed to keep pace with both the evolving food environment and international best practices in nutritional labeling.

The global public health community has increasingly recognized front-of-pack labeling (FoPL) systems as an effective intervention for addressing diet-related NCDs. Chile's implementation of mandatory warning labels in 2016 demonstrated that clear, interpretive labeling can significantly reduce purchases of unhealthy products, with studies showing a 24% decline in sugary drink sales (Taillie et al., 2020). Similar systems have since been adopted across Latin America and parts of Asia, while other regions have experimented with alternative approaches like the Nutri-Score in Europe and Health Star Ratings in Australia and New Zealand. These international experiences provide valuable lessons for Fiji as it considers reforms to its own food labeling framework.

> *“only about **30%** of Fijian consumers regularly read nutrition labels”*

Despite the demonstrated potential of FoPL systems, their implementation in small island developing states like Fiji presents unique challenges. The country's heavy reliance on imported processed foods - which constitute approximately 70% of the food supply (SPC, 2021) - creates complex regulatory dynamics involving multinational food corporations and regional trade agreements. Additionally, Fiji's diverse population, with varying levels of health literacy across urban and rural communities, requires careful consideration of how different labeling formats might be understood and acted upon. Previous research has shown that only about 30% of Fijian consumers regularly read nutrition labels (Consumer Council of Fiji, 2021), suggesting current labeling approaches may be failing to communicate effectively with most of the population.

This study seeks to address critical gaps in understanding about how Fiji's food labeling policies could be strengthened to better protect public health. While previous assessments have documented general weaknesses in the existing regulatory framework, there has been limited research examining the perspectives of key stakeholders - including food importers, health professionals, and consumers themselves - on potential reforms. Furthermore, the applicability of international labeling models to Fiji's unique socio-economic and cultural context remains underexplored. By combining policy analysis with original consumer surveys and stakeholder interviews, this research provides new evidence to inform the ongoing debate about food labeling reforms in Fiji.

The significance of this research extends beyond academic interest, as the Fijian government has recently signaled intentions to review its food labeling regulations. Findings from this study will directly contribute to this policy process by identifying which labeling approaches are most likely to be effective in Fiji's context, what implementation challenges might be anticipated, and how various stakeholder concerns could be addressed. Moreover, as other Pacific Island countries face similar public health challenges related to nutrition transition, the lessons from Fiji may have broader regional relevance.

The paper proceeds as follows: First, a literature review examines global evidence on different FoPL systems and their effectiveness. The methodology section then details the mixed-method approach combining policy analysis, consumer surveys, and stakeholder interviews. Subsequent sections present findings on current policy gaps, industry perspectives, and consumer interactions with food labels. The discussion considers these results in light of international experiences, before concluding with evidence-based recommendations for policy reform. Through this comprehensive analysis, the study aims to provide policymakers with the tools needed to design a food labeling system that genuinely supports Fijians in making healthier food choices.

By addressing both the technical aspects of label design and the practical realities of implementation in Fiji's unique context, this research makes an important contribution to ongoing efforts to combat the NCD crisis in the Pacific region. The findings will be particularly relevant as Fiji considers adopting more stringent labeling requirements and as regional bodies like the Pacific Community (formerly the South Pacific Commission- SPC) work towards harmonizing food standards across island nations. Ultimately, the study underscores the potential of well-designed food labeling policies to serve as a powerful tool for public health improvement while highlighting the need for context-specific solutions that account for Fiji's economic, cultural, and regulatory realities.

RESEARCH METHODOLOGY

This study employs a convergent mixed-methods design, combining quantitative and qualitative approaches to offer a comprehensive and empirically grounded analysis of food labelling practices in Fiji. This design ensures methodological triangulation, enhances validity, and enables an in-depth understanding of both systemic regulatory gaps and lived consumer experiences.

Study Design and Rationale

The research follows a sequential exploratory framework, beginning with a qualitative assessment of policy and stakeholder environments, followed by quantitative measurement of consumer knowledge, behaviours, and perceptions. This design was selected to build an initial conceptual foundation based on contextual realities and stakeholder insights and subsequently quantify key variables influencing food labelling outcomes.

This structure is aligned with internationally recognized best practices in public health and policy research, particularly those endorsed by the World Health Organization (WHO), which advocate for integrated approaches to examining complex social health phenomena such as diet-related non-communicable diseases (NCDs).

Phase 1: Policy and Literature Review

The first phase consisted of desk-based policy analysis and global benchmarking. Fiji's Food Safety Act 2003 and Food Safety Regulations 2009 were systematically reviewed against global and regional regulatory frameworks, including:

- WHO Guidelines on Nutrient Profiling and Food Labelling;
- Chile's mandatory "High-in" warning labels (Taillie et al., 2020);
- Australia and New Zealand's Health Star Rating (HSR) system;
- WTO trade considerations relevant to small island states.

In parallel, a systematic literature review was undertaken, incorporating peer-reviewed studies on front-of-pack labelling (FOPL) effectiveness, behavioural economics in food choices, and corporate responses to regulatory changes. Seminal research from Moodie et al. (2021), Julia et al. (2022), and Khandpur et al. (2023) provided key insights into consumer psychology, industry lobbying, and nutrition equity.

Phase 2: Quantitative Consumer Survey

A nationally representative cross-sectional survey was conducted with 504 Fijian adults, using a stratified random sampling technique to ensure demographic and geographic diversity. Stratification variables included urban-rural residency, age, gender, and income level. This approach ensured adequate inclusion of populations typically underrepresented in consumer research, such as rural households and low-literacy individuals.

The survey instrument was designed following global standards in nutrition behaviour research and pre-tested for cultural relevance and comprehension. Key survey domains included:

- Awareness and comprehension of back-of-pack and front-of-pack labels;
- Frequency and context of label usage during purchasing;
- Interpretation of claims (e.g. "natural", "low fat", "fortified");
- Influence of labelling on purchasing decisions.

Data was collected via a hybrid approach, utilizing both online platforms (e.g., SurveyMonkey) and in-person interviews conducted in markets and retail outlets across Central and Western Divisions. Field enumerators were trained in ethical research conduct and local language fluency to ensure accurate data collection.

Phase 3: Qualitative Key Informant Interviews

The qualitative component comprised 30 semi-structured interviews with key stakeholder groups, selected through purposive sampling based on relevance, influence, and diversity of perspectives. Interview groups included:

- Industry stakeholders (n=15): Importers, distributors, and retailers, including multinational corporations and small-scale enterprises;
- Public health experts (n=10): Dieticians, nutritionists, and Ministry of Health officials;
- Academic researchers (n=5): From the University of the South Pacific and Fiji National University, with specialisations in public health, food systems, and consumer rights.

Each interview lasted between 30–45 minutes and explored themes such as regulatory enforcement, labelling compliance barriers, consumer behaviour, and the feasibility of voluntary versus mandatory labelling. A thematic coding framework was applied to transcripts to identify recurring patterns and policy-relevant insights.

Ethical Considerations

Ethical clearance for the study was obtained through the Consumer Council's internal ethics protocol, in alignment with the Declaration of Helsinki and Pacific-based research ethics principles. All participants provided written informed consent, and anonymity was maintained throughout the data analysis and reporting stages. Particular care was taken to avoid power imbalances, especially when interviewing small businesses or rural participants.

Limitations

Despite a robust design, certain limitations are acknowledged:

- Self-reported behaviours may be subject to recall and social desirability bias;
- Limited access to Fiji's outer islands constrained full national geographic coverage;
- A minority of businesses were reluctant to share commercially sensitive information, particularly related to cost of compliance.

These limitations were mitigated through data triangulation, rural oversampling, and stakeholder validation workshops.

Methodological Contribution and Policy Relevance

This study provides policy-relevant evidence base grounded in rigorous empirical methods and localised stakeholder engagement. It aligns with the WHO's "Best Buys" for NCD prevention and offers a replicable model for similar small island developing states (SIDS). By integrating behavioural data, regulatory review, and industry perspectives, the methodology offers a holistic approach to understanding the challenges and pathways for reforming food labelling in Fiji.

The findings that follow are organised according to key research objectives—identifying policy gaps, evaluating consumer engagement, and assessing industry readiness. Supplementary materials, including survey instruments, consent forms, and thematic coding sheets, are available upon request.

LITERATURE REVIEW

Front-of-Pack Labelling (FoPL) has emerged globally as a pivotal nutrition intervention aimed at curbing diet-related non-communicable diseases (NCDs). Traditional back-of-pack nutrition labels are often text-heavy, numerically dense, and require high levels of health literacy and numeracy to interpret—barriers that disproportionately affect low-income and low-literacy populations (Campos et al., 2011; Kanter et al., 2018). In contrast, FoPL systems present simplified, interpretive, and often visual cues on the front of packaging to help consumers make faster and healthier food choices at the point of purchase

Typologies of FoPL Systems

Globally, several FoPL models have been introduced with varying levels of success, including interpretive systems (e.g., warning labels, star ratings) and summary indicators (e.g., Nutri-Score, traffic lights). These models are underpinned by behavioural science theories that emphasize cognitive load reduction, heuristic processing, and nudging consumer behaviour (Hammond, 2011; Roberto et al., 2016).

· Warning Labels (e.g., Chile, Mexico, Israel): These "high-in" symbols use stop signs or cautionary icons to flag excessive levels of sugar, salt, saturated fats, or calories. Chile's 2016 law has been widely cited as a global benchmark; within 18 months of implementation, sugary drink purchases fell by 24% and breakfast cereals high in sugar dropped by 37% (Taillie et al., 2020; Correa et al., 2022). However, legal pushback by food exporters under WTO agreements and unequal behavioural responses across income groups pose significant policy challenges (Thow et al., 2021; Caro et al., 2020).

· Traffic Light Systems (UK, Ecuador): These use red, amber, and green colour codes to signify nutrient content levels. While consumer comprehension is generally high, effectiveness has varied. In the UK, traffic lights supported modest reformulation efforts (e.g., Nestlé reducing sugar content), but had limited impact on overall purchasing patterns (Croker et al., 2020). Ecuador's mandatory adoption in 2014 was weakened by inconsistent enforcement and limited public awareness (Monteiro et al., 2022).

· Health Star Ratings (HSR) (Australia, New Zealand): The HSR provides a single score (0.5–5 stars) based on a nutrient profiling algorithm. While the system encouraged product reformulation (Jones et al., 2019), it faced criticism for algorithm flaws—e.g., high-sugar cereals receiving favourable ratings—and for its low voluntary uptake, with only 30% of eligible products displaying the label (Lawrence et al., 2020).
· Nutri-Score (France, Belgium, Germany): This system grades products on a five-point A–E scale with colour coding. Studies have shown a 15–20% shift toward healthier purchases among consumers exposed to Nutri-Score (Julia et al., 2022). However, controversies have emerged in Southern Europe, where countries like Italy argue that Nutri-Score penalises culturally significant foods like olive oil and Parmesan cheese, raising questions about cultural bias in nutrient profiling (European Commission, 2021).

Key Debates in the Literature

A number of critical debates shape the discourse on FoPL effectiveness:

· Interpretive vs. Non-interpretive Labels: Research consistently finds that interpretive labels (e.g., warning signs or Nutri-Score) are more effective at shifting consumer behaviour than reductive or numeric-only systems (Grunert & Wills, 2018; Hersey et al., 2013). These labels reduce cognitive burden and support decision-making under time constraints—conditions typical of supermarket environments.
· Mandatory vs. Voluntary Schemes: Mandatory labelling systems yield higher coverage and stronger public health outcomes compared to voluntary models, which are often underutilized by industry (Temple, 2020; Hawley et al., 2013). Yet, voluntary adoption is more politically feasible and often serves as a precursor to future regulation, particularly in LMICs and SIDS contexts.
· Equity and Inclusion: Symbol-based systems have been shown to benefit populations with lower literacy and health awareness, helping to close information asymmetries (Arrúa et al., 2017; Khandpur et al., 2023). However, without complementary interventions such as mass media campaigns or school-based education, FoPL can exacerbate inequalities by benefitting only the already-informed (Roberto et al., 2016).
· Industry Resistance and Regulatory Capture: Multiple studies highlight the role of food industry lobbying in diluting or delaying FoPL policies (Moodie et al., 2021; Mialon et al., 2022). Corporate influence tends to push for less direct, voluntary, or neutral labelling systems that minimize reputational risk while maintaining product shelf appeal.

Front-of-Pack Labelling in SIDS and the Pacific

Small Island Developing States (SIDS) face unique structural constraints when implementing FoPL reforms. These include high dependence on imported food, limited regulatory enforcement capacity, and vulnerabilities to external trade pressures (Thow et al., 2021; Snowdon et al., 2013). In the Pacific:

· Samoa introduced mandatory salt warnings in 2020 for imported processed foods, resulting in measurable sodium reduction across several product categories (SPC, 2022).
· Solomon Islands and Vanuatu have piloted simplified nutrition labelling and marketing restrictions for unhealthy children's foods, but full implementation remains stalled due to enforcement and funding barriers.

Moreover, regional dietary transitions have compounded the NCD crisis. With over 75% of deaths in countries like Fiji attributed to NCDs (MOHMS, 2022), the need for effective nutrition interventions—including labelling—is acute.

Gaps and Implications for Fiji

While global evidence supports the efficacy of FoPL, the literature highlights the importance of contextual adaptation. No one-size-fits-all model exists. Instead, the design of FoPL systems must consider:

- Local food environments (e.g., dominance of imported goods);
- Consumer literacy and label comprehension;
- Industry readiness and regulatory capacity;
- Cultural norms and dietary traditions.

For Fiji, the opportunity lies in co-creating a phased, voluntary-to-mandatory FoPL framework that aligns with public health goals, protects consumer rights, and fosters industry accountability. Research and advocacy must also foreground the perspectives of Pacific consumers and ensure that future labelling initiatives reflect their needs, capacities, and aspirations.

SECTION 1: THE CURRENT STATE OF FOOD LABELLING IN FIJI

Fiji's food labelling framework is governed by the Food Safety Act 2003 and the Food Safety Regulations 2009, which outline baseline requirements for the composition, presentation, and disclosure of information on packaged food products. These laws aim to protect consumers from misleading practices, promote informed choice, and support food safety. However, as Fiji confronts an escalating crisis of diet-related non-communicable diseases (NCDs)—responsible for over 80% of deaths nationally (MOHMS, 2022)—it is increasingly clear that current labelling standards are insufficient as a preventive public health tool.

This section critically reviews Fiji's labelling regime through a legal, regulatory, and behavioural lens, drawing on statutory analysis, enforcement audits, and consumer survey data. It also benchmarks Fiji's performance against regional and international best practices to highlight key reform opportunities.

REGULATORY FRAMEWORK

Under Section 13 of the Food Safety Act 2003, all packaged food must carry a label indicating:

- The name and nature of the food;
- A list of ingredients in descending order by weight;
- Net quantity (by weight or volume);
- Nutritional information, where prescribed;
- Allergen declarations for major triggers;
- Country of origin for imported products;
- Batch or lot identification;
- Expiry or best-before dates.

Complementing the Act, Part 4 of the Food Safety Regulations 2009 (Regulations 15–23) mandates that labels be legible, truthful, and non-deceptive, and be presented in English. It also contains detailed rules on special dietary products, irradiated foods, and the declaration of additives and allergens. While these provisions establish a foundational framework, they fall short in aligning with internationally recognized standards such as the Codex Guidelines on Nutrition Labelling (CAC/GL 2-1985) and WHO recommendations for front-of-pack labelling (FoPL).

Key regulatory weaknesses include:

- No mandatory declaration of added sugars: Consumers cannot distinguish between intrinsic and added sugars, limiting their ability to identify high-sugar processed products (Khandpur et al., 2023).
- No interpretive FoPL system: Unlike countries that use traffic lights, warning labels, or health stars to provide quick nutritional cues, Fiji relies solely on the Nutrition Information Panel (NIP)—a text-heavy table requiring high literacy and numeracy.
- Lack of controls on marketing terms: Words like “natural,” “fortified,” or “wholesome” are frequently used without standard definitions or verification requirements, violating principles of transparency and potentially misleading consumers.
- Weak enforcement mechanisms: Despite legal mandates, enforcement remains sparse due to limited regulatory capacity.

Industry Compliance and Challenges

Despite having a legally defined framework under the Food Safety Act 2003 and Food Safety Regulations 2009, implementation and industry compliance with labelling requirements in Fiji remains highly uneven, exposing consumers to inconsistent information and potential harm. These inconsistencies stem from a complex interplay of structural limitations, market asymmetries, and regulatory enforcement challenges.

Multinational corporations such as Nestlé and Coca-Cola generally comply with the letter of the law, meeting the prescribed standards for ingredient declarations and nutritional panels. However, their labels often feature dense technical language and extremely small font sizes, which while technically compliant—undermine the spirit of the regulations. For example, the use of terms like “fortified with vitamins” or “natural energy source” is rarely accompanied by clarifying information, leading to consumer misinterpretation. This creates a form of informational inequity, where only consumers with high literacy and nutritional awareness benefit.

In contrast, local food producers and small-scale importers face significant compliance burdens. Many lack in-house expertise on regulatory requirements, rely on overseas suppliers for labelling, and cannot afford routine laboratory testing or professional graphic design services to update packaging. Stakeholder interviews indicate that compliance is often seen as a cost rather than a business imperative, especially when market and regulatory enforcement pressures are weak. This reinforces a “race to the bottom” dynamic, where cheaper, non-compliant imports can outcompete domestic producers who attempt to meet standards.

A recurring issue raised during interviews is the inconsistency of border enforcement. Importers noted that non-compliant products frequently enter Fiji without adequate scrutiny, particularly during high-volume shipping periods or through minor ports. This creates a dual problem: compliant businesses are placed at a competitive disadvantage, and consumers are exposed to products that may be poorly labelled, misleading, or even unsafe.

These perceptions are supported by empirical evidence. A 2022 audit by the Fijian Competition and Consumer Commission (FCCC) found that 35% of food products on retail shelves breached at least one labelling requirement. The most frequent violations included:

- Incomplete or missing nutrition panels, depriving consumers of critical information.
- Unsubstantiated or misleading health claims, such as “boosts immunity” or “doctor recommended,” which are not backed by scientific evidence.
- Illegible labelling, particularly font sizes below the 1.2 mm minimum threshold set under the Food Regulations 2009.

The implications of this gap between regulation and practice are significant. Consumers cannot make informed dietary choices when products are poorly labelled or when marketing claims are unregulated. For a country grappling with high rates of obesity, diabetes, and hypertension, this constitutes not only a consumer protection failure but also a public health risk.

Moreover, the lack of consistent enforcement creates a credibility gap in the regulatory system. Without meaningful penalties or routine inspections, the food labelling regime risks becoming a “tick-box” exercise rather than an effective governance tool. Therefore there is an urgent need for:

- Improved inspection capacity, particularly at ports of entry;
- Clear guidance and technical support for small and medium enterprises (SMEs) on how to meet labelling standards;
- A graduated sanctions framework that allows for education-first enforcement but escalates in cases of persistent or intentional non-compliance;
- Digital monitoring systems to automate inspection records and flag repeat offenders.

In short, labelling compliance in Fiji reflects a broader pattern of systemic under-resourcing, regulatory fragmentation, and market asymmetry, all of which undermine the protective function of food labelling. Addressing these implementation gaps is essential if labelling reforms are to deliver tangible public health outcomes.

CONSUMER ENGAGEMENT WITH FOOD LABELS: BEHAVIOUR GAPS AND POLICY IMPLICATIONS

Understanding how consumers engage with food labels is critical to evaluating the real-world effectiveness of labelling regulations. Labels, while legally mandated, only serve their public health purpose if they are visible, understandable, and acted upon. Data from this study’s national consumer survey reveals substantial behavioural gaps in label use and interpretation across Fiji—gaps that align with patterns observed in many low- and middle-income countries (LMICs).

Low Utilization of Nutrition Labels

Survey results indicate that only 28% of Fijian consumers regularly read nutrition information when purchasing packaged food. This mirrors global evidence showing that back-of-pack labels, particularly Nutrition Information Panels (NIPs), are underutilized in LMICs, where literacy levels and nutritional awareness tend to be lower (Campos et al., 2011; Draper et al., 2020).

Even among those who do consult labels, comprehension is limited: only 41% of users correctly interpreted technical terms like "% Daily Intake" values. This is consistent with findings from Australia and the UK, where even educated consumers often misinterpret %DI without accompanying visual cues (Maubach et al., 2009; Grunert & Wills, 2018). These results suggest that current labelling formats in Fiji are cognitively demanding, particularly for consumers with limited health or numeric literacy.

Susceptibility to Misleading Marketing

The survey also revealed that 63% of consumers perceived products labelled "natural" as healthier, regardless of their actual nutritional content. This finding supports international literature on the "health halo effect"—a cognitive bias where positive-sounding claims (e.g., "organic," "natural," "wholesome") override objective nutritional assessment (Chandon & Wansink, 2007). Studies in Latin America and Southeast Asia have shown that front-of-pack claims can significantly distort consumer perception, often leading to increased purchase of unhealthy products (Khandpur et al., 2023; Taillie et al., 2020).

In the Fijian context, where labelling terms are not standardized or tightly regulated, such claims serve more as marketing tools than reliable health indicators. This creates a risk of systematic misinformation, especially for vulnerable populations such as youth, low-income households, and rural communities.

Urban-Rural Disparities in Label Use

Behavioural disparities between urban and rural areas are especially pronounced. Urban consumers particularly in Suva and Nadi were 2.3 times more likely to consult food labels compared to rural respondents. While this may partly reflect greater exposure to health messaging and access to packaged foods, it also points to inequities in health literacy and consumer empowerment.

Rural communities often face lower general literacy rates, reduced exposure to nutrition education, and limited time or capacity to decipher dense back-of-pack labelling (WHO, 2021). The Food Safety Regulations 2009, which require labels to be presented in English and often in small fonts, exacerbate these barriers, making critical product information inaccessible to large segments of the population.

Implications for Policy and Practice

These findings underscore a clear mismatch between labelling policy design and consumer capacity. Simply mandating nutritional information is insufficient in a context where large portions of the population cannot decode it. Without usability, labelling becomes performative—serving regulatory compliance but not consumer well-being.

This evidence strongly supports the case for introducing interpretive front-of-pack labelling (FoPL) systems in Fiji, such as:

- Warning labels (e.g., Chile's "High in Sugar" icons);
- Traffic light labelling (as tested in Solomon Islands);
- Health Star Ratings, adapted for Pacific nutritional profiles.

Research across more than 30 countries has shown that such simplified, interpretive labels significantly improve consumer understanding and lead to healthier food choices, especially among low-income and low-literacy populations (Temple, 2020; Julia et al., 2022; WHO, 2023).

Moreover, complementary public education campaigns are essential. Labels only work if people are motivated and equipped to use them. Behavioural interventions—such as in-store signage, radio campaigns, and school-based education—can help reinforce label literacy and shift long-term dietary norms.

Comparison with Regional Neighbours

Fiji lags behind several Pacific Island neighbours that have taken bolder steps to modernize labelling in line with public health priorities: (see table on next page)

Table 1: Labelling Policy Advancements in Pacific Island Countries

Country	Key Labelling Measures
Samoa	Mandatory high-sodium warnings on imported products (2020)
Tonga	Restrictions on trans-fat claims and marketing to children
Australia/NZ	Voluntary Health Star Rating adopted by 30% of products
Solomon Islands	Traffic light labelling pilot tested in major urban centres
Vanuatu	Proposal to ban cartoon characters on unhealthy foods for children

Fiji has yet to pilot or adopt any interpretive FoPL system, despite being a party to multiple regional strategies targeting NCDs, including the Pacific Ending NCDs (PEN) Framework and commitments under the Fiji National Development Plan and NCD Strategic Plan 2022–2030.

KEY WEAKNESSES IN CURRENT SYSTEM

While Fiji's food labelling laws provide a foundational regulatory structure, the system is critically underperforming in practice—marked by a convergence of design inefficiencies, enforcement constraints, and policy stagnation. These systemic weaknesses undermine the intended role of labelling as a low-cost, high-impact public health tool and contribute to a regulatory environment where consumer protection is inconsistently realised.

Cognitive and Structural Complexity

The current reliance on the Nutrition Information Panel (NIP) format—presented as detailed numerical tables on the back of packaging—creates information overload, particularly for individuals with limited literacy or numeracy. This is not unique to Fiji; studies globally have found that NIPs often fail to communicate effectively to large swathes of the population unless supported by simplified front-of-pack formats (Grunert & Wills, 2007; WHO, 2023).

For Fiji, where approximately 31% of the adult population has not completed secondary education (FBoS, 2023), the dense and technical nature of current labels limits usability. Instead of enabling informed choices, such labels contribute to confusion or disengagement—especially among rural and low-income consumers. Without redesign, the existing format risks entrenching health information asymmetry, where only a minority of consumers benefit from legal labelling protections.

Lack of Behavioural Disincentives

Unlike leading international models in Chile, Mexico, or Uruguay, Fiji's labelling regime offers no behavioural disincentive for manufacturers or consumers to avoid unhealthy foods. There are no mandatory warning icons, colour-coded systems, or interpretive ratings that would flag high levels of sugar, sodium, or saturated fat. This lack of signalling allows ultra-processed foods to compete on price and packaging appeal alone, effectively normalising their consumption, even amid rising NCD prevalence.

Evidence from Chile shows that the introduction of warning labels contributed to a 24% decline in sugary beverage purchases and incentivised widespread industry reformulation (Taillie et al., 2020). By contrast, Fiji's passive system exerts no pressure on food companies to improve product formulation or disclose risk more transparently. This represents a missed policy lever in a country where dietary risks are now the leading cause of premature mortality (MOHMS, 2022).

Enforcement and Institutional Capacity Constraints

Enforcement is perhaps the most severe bottleneck in Fiji's labelling regime. According to internal government data, only four food safety inspectors are responsible for overseeing labelling compliance across 900+ registered food importers and hundreds of retailers nationwide. This results in a system that is largely reactive rather than preventive, relying on consumer complaints or targeted audits rather than routine compliance monitoring.

Moreover, border enforcement remains fragmented and inconsistent, particularly at secondary ports of entry. As a result, non-compliant or poorly labelled products often bypass scrutiny, undermining both the law and consumer safety. Without stronger institutional investment—both in personnel and inspection systems—the food labelling regime risks devolving into symbolic regulation, where standards exist on paper but are seldom enforced.

Policy Inertia and Missed Opportunities

Despite growing recognition of NCDs as a national health crisis, Fiji's food labelling policies have seen little meaningful reform in over a decade. While the National NCD Strategic Plan (2022–2030) emphasises food environment interventions, including labelling, no tangible legislative or regulatory updates have been implemented to match these ambitions.

This reflects a broader pattern of policy inertia, often driven by political caution, limited technical expertise in regulatory design, and strong lobbying by industry groups. Yet, global experience shows that food labelling reform—especially interpretive FoPL—can be achieved at relatively low cost and with high public health returns (OECD, 2021). Inaction therefore constitutes a missed opportunity to deploy one of the most accessible and scalable interventions in the food policy toolbox.

SECTION 2: GENERAL FOOD PURCHASING HABITS

Understanding how, where, and how often consumers purchase packaged and processed food is essential for designing a labelling system that meets real-world behavioural and policy needs. This section presents findings from the national survey on general food purchasing habits and interprets them through the lens of international literature and behavioural science. The results confirm that processed foods form a routine part of the Fijian diet, reinforcing the case for the introduction of Front-of-Pack Labelling (FOPL) as a key public health intervention.

FREQUENCY OF PURCHASING PROCESSED/PACKAGED FOOD PRODUCTS

To better understand the applicability and potential impact of Front-of-Pack Labelling (FOPL) in Fiji, the study sought to assess how frequently consumers purchase processed or packaged food items. This information is vital, as the effectiveness of FOPL relies heavily on the extent to which consumers are exposed to and interact with labelled food products. The survey allowed multiple-choice responses to account for variations in shopping patterns.
The responses revealed the following trends:

* Daily Purchases: 115 participants (20.6%) indicated that they purchase processed or packaged food items on a daily basis. This frequency suggests a high level of exposure to packaged goods, particularly among urban dwellers, working individuals, and school-going households where convenience and ready-to-eat options are often prioritized. This group stands to benefit significantly from easy-to-understand nutritional labelling such as FOPL, especially when making quick decisions in-store.

* Weekly Purchases: A majority—325 participants (58.2%)—reported purchasing packaged or processed food items on a weekly basis. This dominant category underscores the routine inclusion of processed foods in most household shopping habits. It also highlights the broad relevance of FOPL implementation, as most Fijian consumers are likely to interact with labelled packaged products at least once per week. Weekly purchasing habits suggest a structured shopping approach, such as weekly market or supermarket visits, where front-of-pack labels could influence product comparisons and encourage healthier choices.

* Monthly Purchases:42 participants (7.5%) indicated that they make such purchases on a monthly basis. This category may consist of consumers who buy in bulk, live in remote or rural areas with limited access to shops, or rely on subsistence farming for most food items, using packaged goods as supplementary. For these consumers, FOPL serves as an important tool to assess the nutritional quality of packaged items during infrequent shopping trips.

* Rarely Purchase:Only 15 participants (2.7%) selected that they "rarely" purchase processed or packaged food. This group might reflect more traditional households or individuals with limited purchasing power, or those who intentionally avoid processed foods for health or cultural reasons.

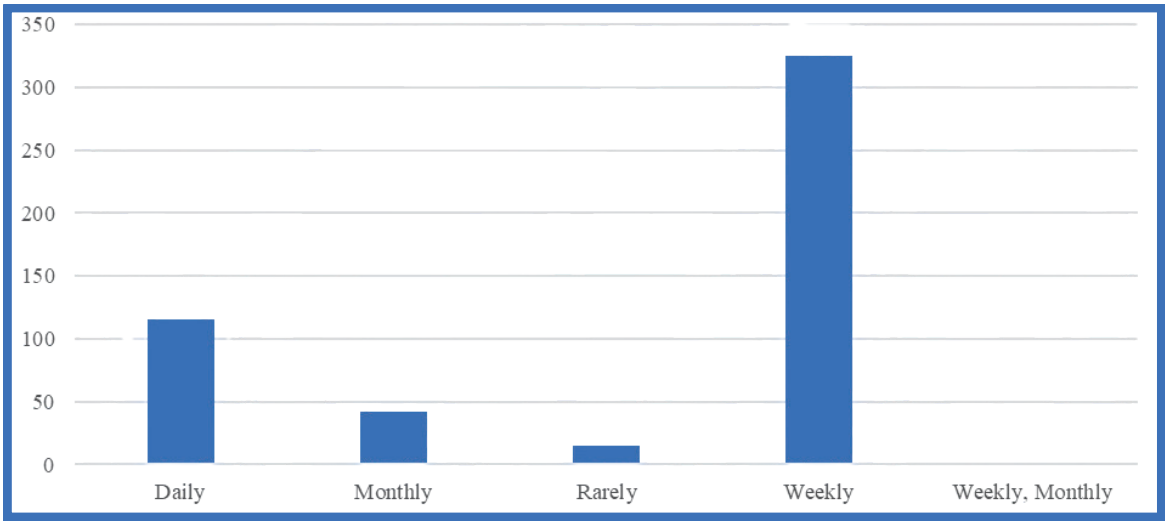
* Other/Combined Responses: One participant recorded both weekly and monthly purchasing patterns, which may reflect fluctuating income, seasonal shopping habits, or differentiated shopping behavior across product types (e.g., weekly purchase of snacks, monthly purchase of cooking ingredients).

Interpretation and Relevance to FOPL Implementation

The data clearly demonstrates that the majority of Fijian consumers regularly purchase processed or packaged foods, with almost 80% doing so on a weekly or daily basis. This supports the case for introducing Front-of-Pack Labelling as a practical public health intervention. If consumers are consistently engaging with packaged goods, placing simple visible nutritional information on the front of packaging could meaningfully guide healthier purchasing decisions at the point of sale. Moreover, the consistent weekly and daily engagement with packaged food also creates opportunities for educational campaigns and consumer sensitization regarding how to interpret FOPL systems ensuring that the label is not only visible but also understood. These findings also have implications for industry compliance. Food manufacturers and retailers would benefit from aligning their products with FOPL guidelines to meet growing consumer awareness and expectations, especially as shopping habits reveal a steady demand for processed food products.

In summary, the purchasing frequency data establishes a strong behavioral foundation for the introduction of FOPL in Fiji, confirming that its implementation could potentially reach and influence a wide base of consumers.

Figure A: The Frequency of Purchasing Processed Food



OPTING TO PURCHASE PROCESSED/PACKAGED FOOD

To determine the most strategic avenues for implementing and promoting Front-of-Pack Labelling (FOPL), the study explored consumer preferences regarding their food purchasing locations across Fiji's retail landscape.

Key Findings:

- Supermarkets (54.1%): A significant number of participants (306) identified supermarkets as their primary point of purchase. Supermarkets are central to Fiji's urban and peri-urban retail environment, offering a wide range of products that can easily accommodate FOPL through standardized packaging and visible signage.

- Local Stores (9.4%): 29 participants selected local stores as their primary shopping location, while 98 participants (16.4%) chose both supermarkets and local stores. These small outlets are especially important in semi-urban and rural areas, underscoring the need for FOPL consistency across smaller distribution channels.

- Traditional Markets (2.6%): 14 participants buy packaged foods from markets, while 49 (8.1%) choose a mix of supermarkets, local stores, and markets. Despite markets primarily selling fresh produce, the increasing presence of packaged foods (snacks, condiments) calls for including these vendors in FOPL strategies.

- Online Purchases (0.2%): Only 1 participant exclusively buys packaged foods online. However, several others combine online shopping with supermarkets or local stores (13.3%). This trend highlights the potential for digital FOPL integration in e-commerce platforms as the online market grows, particularly among younger consumers.

- Mixed Responses: Many participants (98 participants selected supermarkets and local stores; 49 chose supermarkets, local stores, and markets) exhibited blended shopping habits, suggesting most consumers use multiple purchasing outlets based on convenience, availability, and price.

Implications for Front-of-Pack Labelling (FOPL) Implementation

The purchasing habits identified in this study have important implications for the strategic design and phased implementation of a national Front-of-Pack Labelling (FOPL) system. Fiji's food retail landscape is diverse, spanning formal supermarket chains, informal community stores, traditional markets, and emerging e-commerce platforms. A successful FOPL strategy must therefore be context-sensitive, equity-driven, and scalable across these multiple environments.

1. **Supermarkets as the Primary Launchpad**

Given their wide product range, structured supply chains, and dominance in urban and peri-urban retail, supermarkets represent the most logical and impactful entry point for the introduction of FOPL. With over 50% of consumers reporting supermarkets as their main source of processed food, a first-phase rollout targeting these outlets would allow for:

- High visibility and exposure of new labels;
- Easier regulatory enforcement due to corporate centralisation;
- Collaboration opportunities with major food manufacturers and importers.

This approach aligns with global best practices, where early FOPL adoption in formal retail sectors has driven both consumer awareness and industry reformulation (Taillie et al., 2020; Julia et al., 2022).

2. **Inclusion of Local Stores and Informal Vendors in Second-Phase Expansion**

While supermarkets dominate urban settings, local shops and semi-formal vendors remain the backbone of food access in rural and outer island communities. These outlets are especially critical for low-income and geographically isolated consumers, who are disproportionately affected by poor diet-related health outcomes.
Integrating FOPL into these outlets—possibly through simplified packaging icons, shelf labels, or vendor training—will be essential to:

- Avoid deepening urban-rural health inequalities;
- Ensure that nutritional information reaches high-risk populations;
- Embed labelling reform within a broader framework of consumer protection and public health equity (WHO, 2021).

A phased approach that begins with supermarkets but explicitly plans for rural and informal retail inclusion reflects the principles of universal design and inclusive health policy.

3. E-Commerce and Digital Platforms: Planning for the Future

Although still a small fraction of the market, online food retail is gradually expanding, particularly among younger, urban consumers. Integrating FOPL principles into e-commerce—such as displaying simplified nutrition icons next to products—can pre-emptively address information asymmetry in digital environments.
Countries like Singapore and the United Kingdom have already begun piloting "digital labelling overlays" on grocery apps and websites (OECD, 2022). Fiji could consider similar innovations as part of a forward-looking strategy, ensuring that digital nutrition transparency keeps pace with technological adoption.

4. Tailored Consumer Education Across Retail Channels

Front-of-pack labels alone will not guarantee healthier choices unless they are accompanied by robust public education efforts. These campaigns must be tailored to Fiji's varied retail environments and consumer demographics:

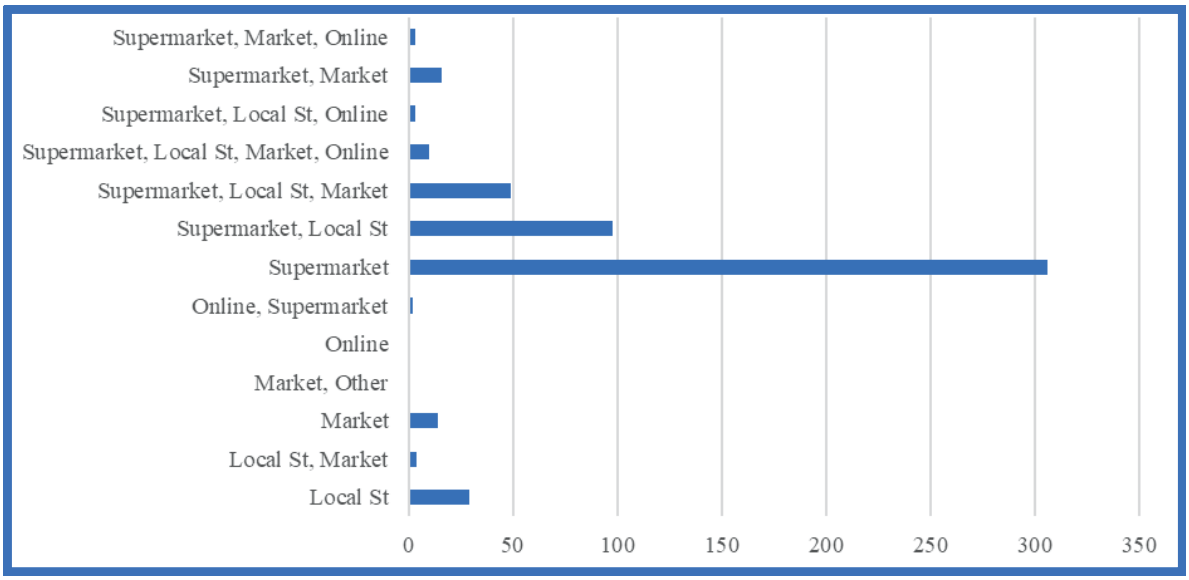
- In supermarkets: shelf signage, posters, and checkout infographics can reinforce label interpretation.
- In rural areas: radio spots, community outreach, and school-based programming can improve understanding among lower-literacy populations.
- In digital spaces: social media campaigns and nutrition influencers can engage tech-savvy youth.

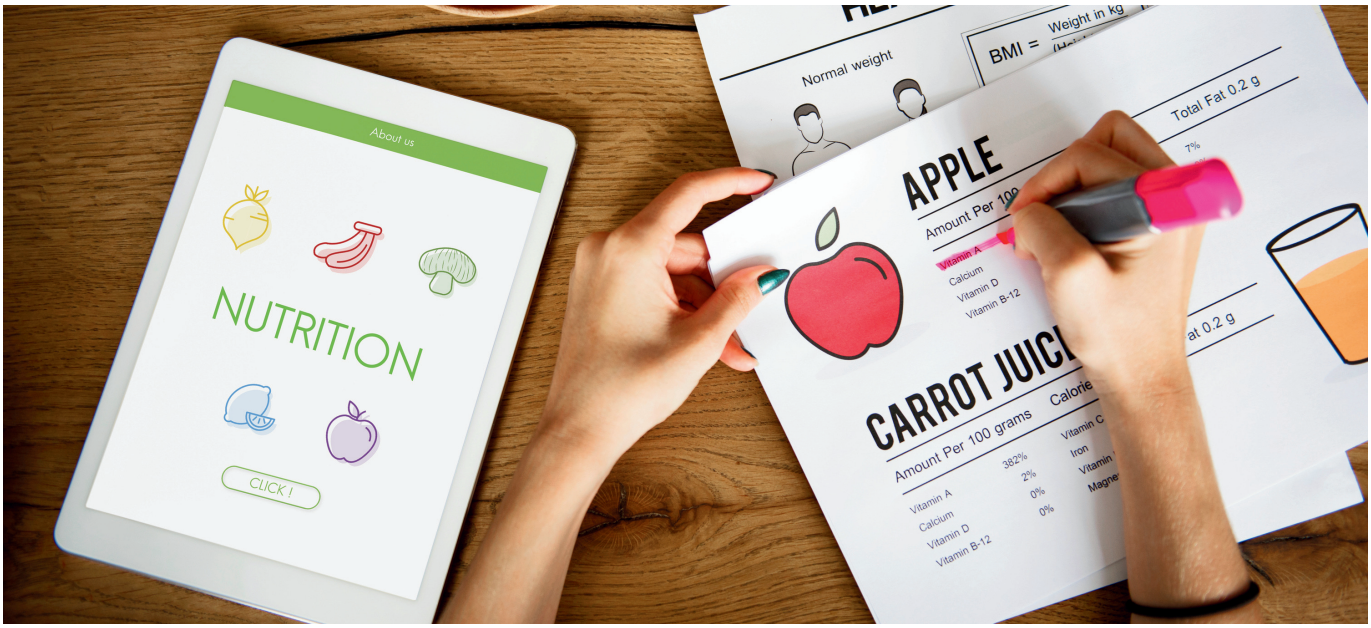
Educational outreach is particularly vital for overcoming behavioural and cultural barriers to label use such as habitual brand loyalty, mistrust of technical terms, or misperceptions about health claims (Grunert & Wills, 2018; Khandpur et al., 2023).

Toward a Holistic FOPL Strategy for Fiji

To be effective, Fiji's FOPL implementation must move beyond regulatory mandates and adopt a whole-of-ecosystem approach. This means integrating labelling reforms with broader efforts to improve food literacy, consumer empowerment, and supply chain transparency. A staged rollout beginning with supermarkets, followed by phased expansion into rural stores, informal markets, and digital platforms, offers a realistic yet impactful path forward.
By aligning implementation with actual shopping behaviours and access points, Fiji can ensure that FOPL functions not only as a compliance tool—but as a pro-poor, population-wide intervention to advance public health, address non-communicable diseases, and strengthen consumer rights.

Figure B: Where Consumers Purchase Processed/Packaged Food From





SECTION 3: NUTRITIONAL AWARENESS

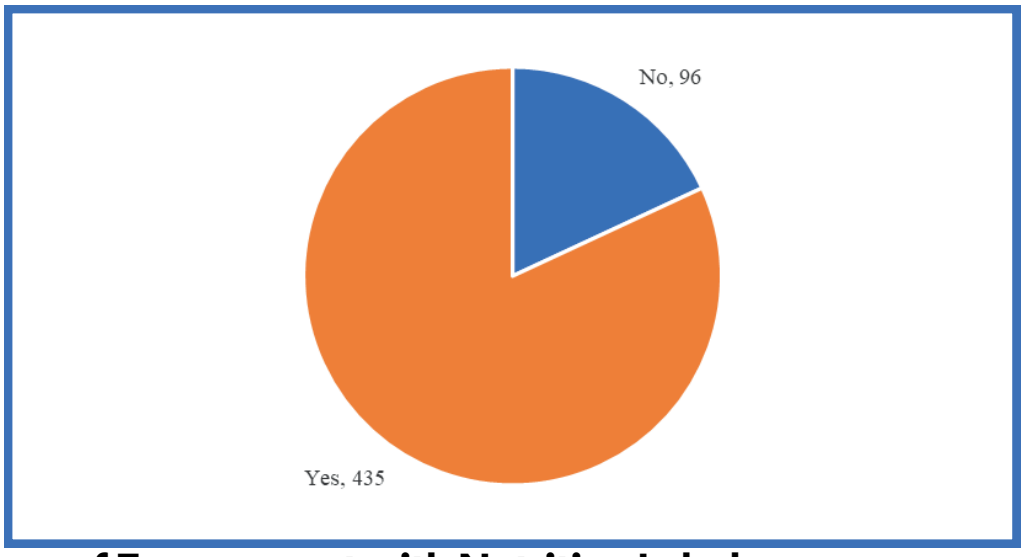
Understanding how consumers interact with and interpret existing nutrition labels is fundamental to designing effective labelling interventions. This section presents findings from the Council's national survey on nutritional awareness, comprehension, and labelling challenges. The results expose a critical gap between awareness and action—where consumers may know that nutrition information exists, but are unable to meaningfully use it. These insights strengthen the case for a simplified, front-of-pack labelling (FOPL) system tailored to Fiji's sociocultural context and health priorities.

AWARENESS OF NUTRITIONAL LABELLING

A significant 82% of survey respondents reported awareness of the nutritional information printed on the back of packaged food products. This high level of baseline awareness provides a strategic foundation for nutrition-related policy interventions. However, awareness alone is an insufficient metric of effectiveness—what matters most is whether consumers can understand and act upon the information provided.

This disconnect is well-documented in the global literature. A systematic review by Campos et al. (2011) found that while awareness of nutrition labels is generally high in both developed and developing contexts, label comprehension and utility remain low, especially in populations with limited education or health literacy. Similarly, Grunert and Wills (2007) argued that the cognitive load imposed by complex, back-of-pack (BOP) nutrition panels often neutralizes their intended public health benefits. In the Fijian context—where linguistic diversity, uneven education levels, and varied health literacy are prevalent—mere awareness cannot be interpreted as a sign of labelling effectiveness. Rather, it underscores the untapped potential for simplified, front-of-pack labelling (FOPL) systems to transform passive awareness into active, informed decision-making.

Figure C: Being Aware of Nutritional Information



Frequency of Engagement with Nutrition Labels

Despite high reported awareness, actual engagement with nutrition labels shows considerable variation:

- Only 21.3% of respondents consistently read nutrition labels before purchasing food.
- 60.7% read them “sometimes,” suggesting intermittent or situational usage.
- 16.4% “rarely” read them, and 2.8% “never” do.

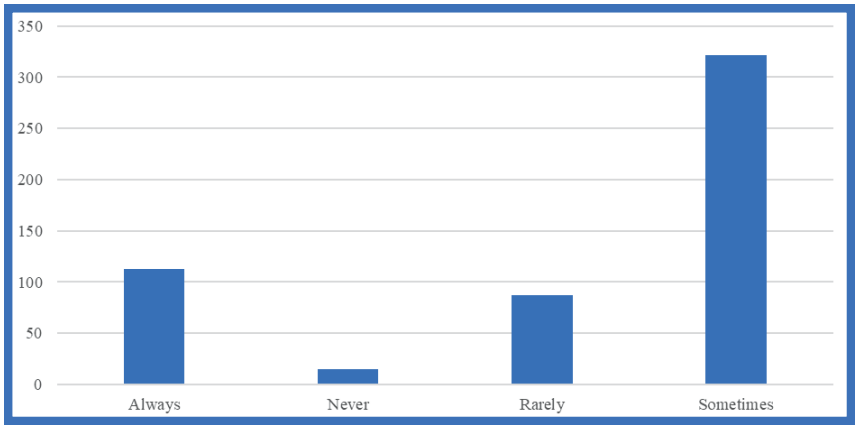
These figures reveal a critical gap between intention and behavior, aligning with behavioural science research that points to "intention-action asymmetry" in food purchasing decisions (Rothman et al., 2009; Hieke & Taylor, 2012). That is, consumers may intend to eat healthily or be aware of labels, but are often unable or unwilling to process complex nutritional information during actual purchasing moments.

The fact that nearly one in five Fijians either rarely or never consult nutrition labels is concerning from a public health standpoint. It implies that existing labelling systems are failing to serve a significant portion of the population, particularly those who may be most vulnerable to diet-related health issues, such as individuals with low income, rural residence, or lower education levels.

Globally, research shows that even when back-of-pack labels are technically compliant, they often lack salience, simplicity, and interpretability—qualities necessary to influence real-time decision-making (Hersey et al., 2013; WHO, 2023). A landmark study by Khandpur et al. (2018) noted that time-pressured, low-literacy, or nutritionally uninformed consumers benefit disproportionately from visual, front-of-pack labelling formats, which allow for immediate nutritional assessment without requiring deep knowledge of macronutrients or serving sizes.

In Fiji, where shopping is often conducted under time constraints and in informal or crowded settings, the design and placement of nutritional information is as important as the content itself. Introducing a FOPL system—particularly one using color coding, warning icons, or star ratings can increase visibility and uptake of health-promoting behaviours at the point of sale. These findings make a compelling case for rethinking the architecture of Fiji’s food labelling system. Despite awareness being relatively high, the low rate of consistent label usage—coupled with challenges in comprehension (Section 3.3)—points to the inadequacy of the current BOP-only approach. Front-of-pack labelling, grounded in behavioural design principles and supported by consumer education campaigns, is internationally recognized as a low-cost, high-impact tool to support healthier dietary choices (OECD, 2022; WHO, 2023).

Figure D: Frequency of Reading the Nutritional Labels Before Purchasing Food



Comprehending the Current Nutritional Labels

While 63.8% of respondents (n=339) indicated that they found current nutritional labels easy to understand, a substantial 32.4% (n=172) reported that they found them confusing or difficult. On the surface, this may appear to reflect moderate label comprehension; however, the underlying dynamics point to a systemic "nutrition information divide"—a phenomenon extensively documented in public health and behavioural nutrition research (Hawley et al., 2013; Campos et al., 2011).

This divide reflects not merely individual knowledge gaps, but structural inequities in who is equipped to make sense of complex, data-heavy back-of-pack (BOP) nutrition panels. Research shows that higher comprehension rates are strongly correlated with higher education levels, urban residence, fluency in the label language, and prior exposure to nutrition education (Khandpur et al., 2018; Hieke & Taylor, 2012). Conversely, vulnerable populations—including rural residents, older adults, those with lower formal education, and individuals with limited English proficiency—are consistently disadvantaged.

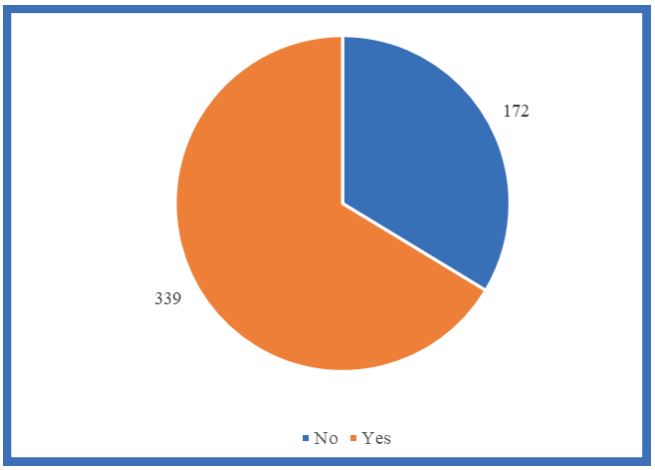
In Fiji's multi-ethnic, multi-lingual, and geographically dispersed context, these disparities are particularly salient. Literacy rates remain uneven across the population, with nearly one-third of rural Fijians reporting difficulties with written English (FBoS, 2022). This exacerbates the challenge of engaging with labels that rely heavily on numeric data (% Daily Intake), technical terms (e.g., "saturated fat," "kilojoules"), and small font formats that require a high level of visual literacy and health knowledge.

Comprehension difficulties are not only a barrier to healthier choices—they are also a form of exclusion from public health messaging. As Hersey et al. (2013) and the OECD (2022) point out, if critical nutrition information is only accessible to a subset of the population, the labelling system reinforces dietary inequities rather than mitigating them.

International evidence highlights the benefits of simplified, interpretive Front-of-Pack Labelling (FOPL) systems in closing this divide. In Chile, for instance, warning labels using bold black stop-sign symbols led to measurable increases in nutritional awareness among low-income consumers (Taillie et al., 2020). Similarly, the Health Star Rating (HSR) system in Australia helped increase label comprehension among consumers with lower nutrition knowledge, particularly when paired with public education campaigns (Jones et al., 2019).

These findings suggest that improving the readability of nutrition labels is not merely a design issue—it is a public health equity imperative. In the absence of label formats that are immediately intelligible across demographic and educational lines, Fijian consumers—especially those most vulnerable to diet-related NCDs—will continue to face structural barriers to healthy eating.

Figure E: Comprehending the Current Nutritional Labels



CHALLENGES

The Consumer Council's survey revealed a wide range of challenges faced by consumers when attempting to interpret the nutritional information on food packages. These challenges are significant as they directly impact a consumer's ability to make informed food choices and highlight why existing back-of-pack labelling formats are insufficient for Fiji's diverse population. The responses, based on multiple-choice options and open-ended inputs, were categorised as follows:

1. Confusing or Technical Terminology

A total of 84 participants explicitly indicated that the information on nutritional labels were confusing. This perception was compounded by others who chose combined options such as:

- "Confusing and small print" (67 participants)
- "Confusing, small print, and too much information" (33 participants)
- Additional combinations with terms like "other," "not relevant," and "too technical."

This trend indicates that for a significant segment of the population, the language used on labels is too complex often laden with scientific or unfamiliar nutrition terms such as "saturated fat," "sodium," or "energy per 100g." Such technical detail may comply with international labelling standards but is impractical for consumers without formal education in health or science. The challenge is particularly acute for:

- Rural consumers with limited literacy
- Elderly individuals
- Consumers shopping under time constraints

Front-of-Pack Labelling (FOPL) addresses this issue by replacing complex numerical data with intuitive icons, colour codes, or star ratings, instantly conveying a product's healthiness.

2. Small Print Size

One of the most recurring complaints was the font size used in current nutritional panels:

- 191 participants marked "small print" as a standalone concern.
- Others combined it with options like:
- "Small print and too much information" (34 participants)
- "Small print and not relevant" (5 participants)
- "Small print and other" (2 participants)

This reflects a serious accessibility issue. Consumers with visual impairments, older adults, or those shopping in dimly lit environments find it difficult—if not impossible—to read the small print. Even those who are keen to make healthier choices may give up due to eye strain or inconvenience, especially when under pressure or shopping quickly. FOPL systems resolve this issue by displaying clear, front-facing indicators (e.g. colour bars or stars) that are large, standardised, and easy to spot, removing the need for extensive reading.

3. Too Much Information

Another recurring barrier was the perception that nutritional labels were overloaded with data:\

- 41 participants selected “too much information” as the primary issue.
- Many combined this with confusion or small print:
- “Too much information, confusing, and small print”
- “Too much information and not relevant”

This signals that the format and layout of current labels can overwhelm consumers, especially when multiple nutrients, percentages, footnotes, and serving sizes are packed into one space. The issue is not necessarily the amount of information, but rather how it is presented and prioritised. In contrast, FOPL is designed to prioritise key nutrients—like sugar, salt, and fat—using a simplified summary format. For example:

- Warning labels to indicate “High in Sugar”
- Star ratings to show overall nutritional quality
- Traffic-light colours to highlight levels of key nutrients

4. Irrelevance to Consumer Needs

22 participants chose “not relevant to their needs,” suggesting a disconnect between what is provided on labels and what consumers actually want to know. Some respondents paired this with other complaints, like:

- “Not relevant and small print”
- “Not relevant, too much information, and confusing”

This could reflect:

- A lack of personalisation in labels (e.g. no emphasis on sugar for diabetics, or allergens for sensitive consumers)
- Disregard for cultural food preferences or nutritional priorities (e.g. local diets vs. imported food metrics)
- Lack of contextual explanation—percent daily intake values may be hard to understand in the absence of personalised guidance.

FOPL systems have the advantage of centering health concerns that are universally relevant to the Fijian context—such as sugar, salt, fat, and calorie content—without overwhelming users with medical jargon.

5. Other Challenges

A number of participants (8) selected “Other,” and a few combined this with categories like:

- “Confusing and other”
- “Small print and other”

While the responses in this category were not elaborated in detail, based on similar studies and anecdotal evidence from consumer forums, these "other" challenges may include:

- Mistrust of label accuracy
- Inconsistency between local and imported products
- Language barriers, particularly among iTaukei and Hindi speakers if labels are printed in English only
- Cultural perceptions, where nutritional information is not viewed as a priority

These issues again affirm that any successful labelling initiative must be locally tailored, culturally sensitive, and available in simplified formats. Voluntary FOPL guidelines can accommodate this flexibility, whereas rigid back-of-pack formats often cannot.

WHY THESE FINDINGS MATTER: POLICY AND PUBLIC HEALTH IMPLICATIONS

The findings from this study paint a clear picture: while there is widespread awareness of nutrition labels among Fijian consumers, comprehension, usability, and actual behaviour change remain constrained by the current labelling system's complexity, technicality, and inaccessibility. This disconnect is particularly acute for low-literacy, rural, and older populations—demographics that also bear the brunt of Fiji's rising non-communicable disease (NCD) burden.

This matters not only for consumer rights, but for national health security. Fiji continues to face one of the highest NCD prevalence rates in the Pacific, with over 80% of deaths linked to diet-related conditions such as diabetes, hypertension, and cardiovascular disease (MoHMS, 2023). The National Non-Communicable Diseases Strategic Plan 2022–2030 clearly identifies poor diets and unhealthy food environments as priority areas for intervention. Yet, the current back-of-pack (BOP) labelling format—often dense, small-font, and jargon-heavy—has failed to empower consumers with actionable information at the point of purchase.

A growing body of global public health literature supports the introduction of interpretive Front-of-Pack Labelling (FOPL) as a cost-effective, scalable intervention to tackle dietary risk factors. Unlike traditional nutrition panels, FOPL uses intuitive symbols —such as traffic lights, star ratings, or high-in warnings—to instantly communicate a product's health value. This has proven particularly effective in contexts where literacy is uneven and shopping decisions are made rapidly or under cognitive load (WHO, 2023; Taillie et al., 2020).

Policy Lessons from International Experience

- Consumer comprehension: FOPL improves consumer understanding of nutritional quality by up to 60%, even among low-literacy and disadvantaged groups (WHO, 2023; Hersey et al., 2013).
- Behaviour change: Studies in Chile, Mexico, and France have shown significant reductions in the purchase of high-sugar beverages and ultra-processed foods following the introduction of mandatory FOPL systems (Taillie et al., 2020; Basto-Abreu et al., 2023).
- Industry reformulation: In Australia, the Health Star Rating (HSR) prompted manufacturers to reduce sodium and sugar content in processed foods to avoid negative label scores (Jones et al., 2019).

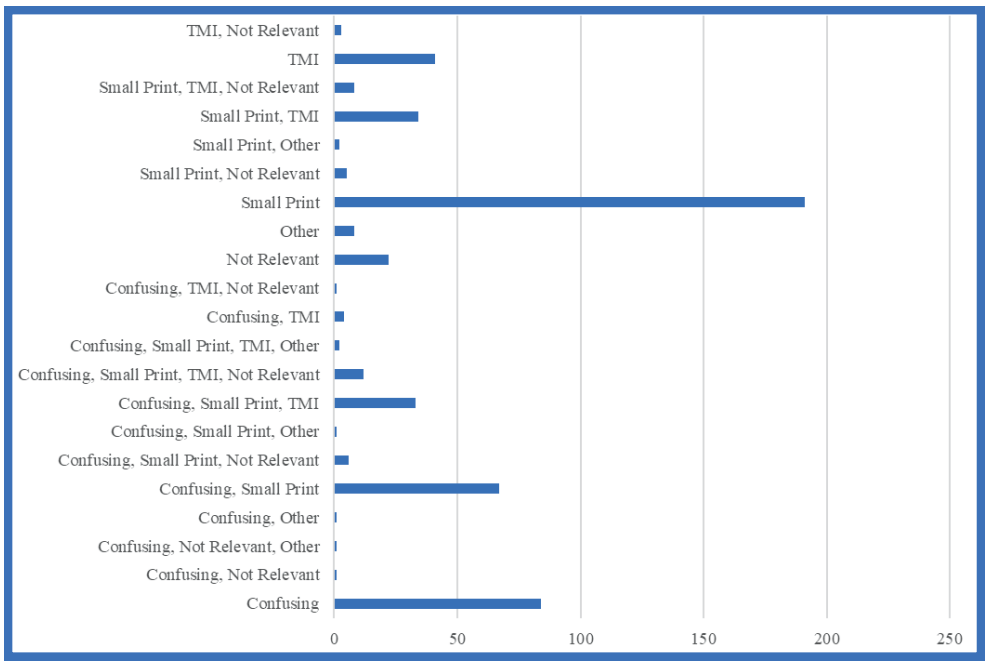
These outcomes are particularly relevant for Fiji, where consumer surveys consistently show that label confusion and small print are widespread barriers, and where rising import penetration has increased the availability of ultra-processed foods in both urban and rural markets.

Strategic Case for FOPL in Fiji

Adopting a nationally tailored FOPL system in Fiji could:

- Translate complex nutritional data into simple, accessible symbols—bridging the knowledge gap across age, education, and language groups.
- Strengthen consumer rights and protections—by reducing reliance on misleading health claims (e.g. "natural", "immune boosting") currently prevalent on ultra-processed products.
- Reinforce national NCD prevention strategies—by creating an enabling environment where healthier food choices are easier, faster, and more intuitive.
- Create incentives for industry compliance—as manufacturers are encouraged to improve product profiles to receive favourable label scores or avoid negative warnings.
- Amplify the impact of public education campaigns by offering visual cues that reinforce dietary guidance, even in the absence of formal nutrition training.

Figure F: The Challenges Identified by Respondents



SECTION 4: FRONT OF PACK LABELLING PERCEPTIONS

This section of the survey aimed to assess consumer perceptions and attitudes toward Front-of-Pack Labelling (FOPL), including their awareness of such a system, whether they believe it would help them make healthier food choices, and which type of labelling format would be most effective for their needs.

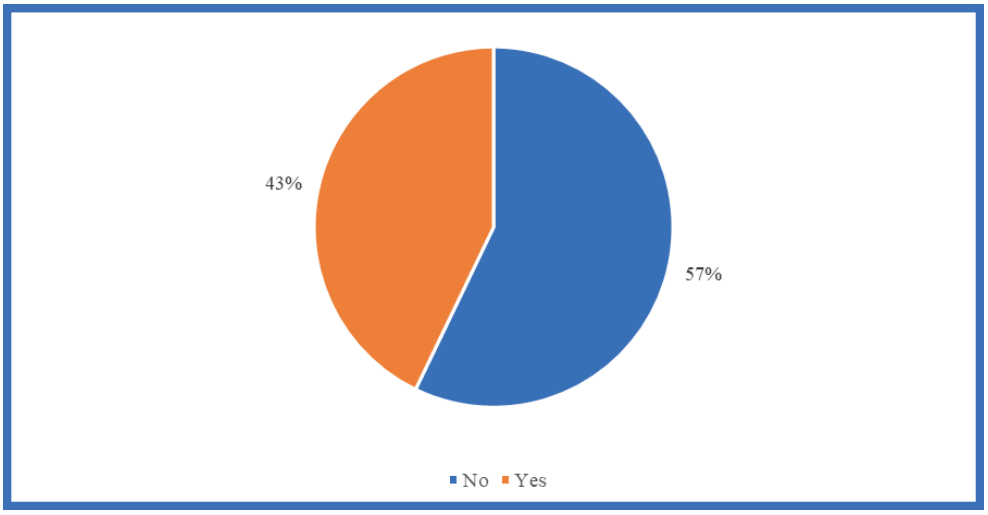
AWARNESS OF PACK LABELLING (FOPL)

The survey found that 43% of respondents had previously encountered the concept of FOPL, while 57% had not. This suggests that nearly half of consumers have been exposed to simplified nutritional labelling, likely through imported food products or media, but there remains a significant awareness gap among the general public. This aligns with regional patterns observed in other Small Island Developing States (SIDS), where limited exposure to international labelling norms results in lower baseline familiarity (Thow et al., 2021).

The relatively modest awareness of FOPL underscores the need for robust public education campaigns to accompany any voluntary or mandatory FOPL rollout in Fiji. Studies have shown that consumer understanding and usage of new labelling formats significantly increase when supported by mass media, in-store demonstrations, and community-level outreach (Roberto et al., 2016; WHO, 2023).

Implication: Awareness is a prerequisite for behaviour change. Without clear, consistent, and culturally appropriate education, even the most well-designed FOPL systems risk being underutilized.

Figure G: Knowledge About FOPL



Are Clear Symbols or Labels on the Front of Food Packages Assisting Consumers in Making Healthier Food Choices?

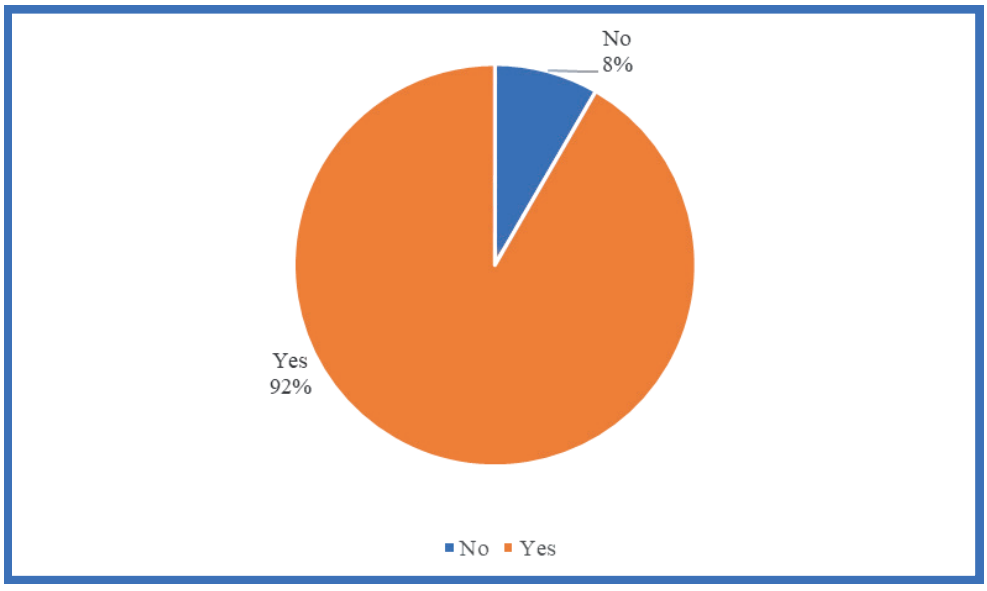
In a follow-up question, respondents were asked whether clear front-of-pack symbols or labels would help them make better food choices. The response was overwhelmingly positive:

- 482 participants (over 92% of respondents to this question) stated that they believed FOPL would assist in making healthier food choices.
- Only 44 participants responded "No" to this question.

This result is striking and highly supportive of the core rationale behind introducing FOPL in Fiji. It demonstrates that even consumers who were previously unaware of FOPL understand and value the concept once it is presented to them. The clarity, visibility, and simplicity of front-of-pack indicators are intuitive and are seen as helpful tools, especially in contrast to traditional back-of-pack nutrition panels that many participants have already indicated they find confusing, hard to read, or irrelevant.

These findings provide strong consumer-based evidence that introducing voluntary FOPL guidelines could positively influence purchasing decisions and drive demand for healthier products.

Figure H: Clear Symbols Assisting Customers



Type of Front of Pack Labelling That would be Most Helpful

When consumers were asked what type of front-of-pack labelling they believed would be most helpful in making healthier food choices, a variety of preferences emerged, indicating that different consumers are drawn to different types of simplified labelling systems. A majority of respondents showed a strong preference for the Health Star Rating system, either as a standalone option or in combination with other formats. Specifically, many participants selected the Health Star Rating and Warning Labels together, demonstrating that consumers want both an overall indication of a product's healthiness and specific warnings for key nutrients such as salt, sugar, or fat. Others opted for more comprehensive approaches—such as a combination of Health Star, Traffic Light, and Warning Labels—indicating a desire for multi-layered information that is still easy to interpret at a glance.

A smaller segment of participants preferred the Traffic Light system alone, which uses colours like red, amber, and green to highlight high, medium, and low levels of particular nutrients. This system appeals to consumers who want to compare nutrient levels across products without needing to interpret numerical values. Likewise, some participants selected Warning Labels only, suggesting a preference for straightforward caution signs that highlight when a product is high in ingredients of public health concern. Although a very small number of respondents mentioned "Other" options, the overwhelming trend was in favour of interpretive, visual, and easy-to-understand labelling.

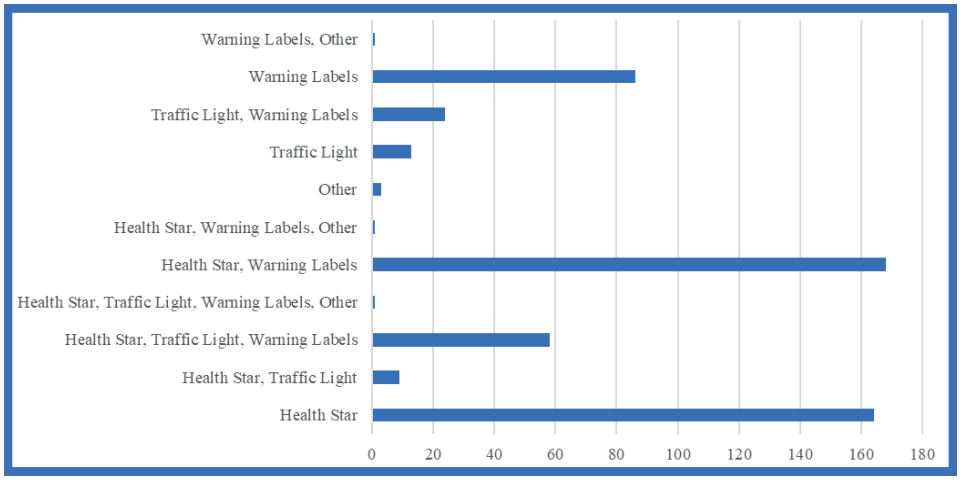
The results confirm that while no one-size-fits-all format emerged, consumers favour front-of-pack systems that help them make faster and more informed decisions. There is a clear demand for voluntary guidelines that prioritise simplicity, visibility, and usefulness at the point of purchase. The popularity of the Health Star system—particularly when paired with warning labels indicates that a hybrid approach may be the most effective for Fiji's consumer market.

Key Takeaways:

- The Health Star Rating system emerged as the most favoured option, either as a standalone tool or in combination with other formats. This suggests it is easy to understand and appealing for consumers in Fiji.
- A significant number of participants preferred combinations, especially Health Star + Warning Labels, reflecting a desire for both overall product assessment and nutrient-specific caution.
- Although the Traffic Light System was less popular on its own, many supported it when combined with other labelling formats.
- Warning Labels also had considerable support, particularly among those who may want a quick visual cue to avoid products high in specific nutrients.

This section of the survey reinforces that while different consumers may have different needs, there is clear interest and support for simplified, prominent, and interpretive front-of-pack labelling systems. The data also underscores the importance of flexibility in the voluntary guideline framework, allowing businesses to adopt the system that works best for their target audience —provided it adheres to basic design principles of clarity, visibility, and standardisation.

Figure H: Helpful Types of FOPL



FOPL Influence on Consumer Purchasing Decisions

The survey data revealed a strong consensus among participants on the potential impact of front-of-pack labelling (FOPL) on consumer purchasing behaviour. An overwhelming majority—487 respondents—believed that the presence of clear and visible nutritional labels on the front of food packaging would influence their decisions when choosing food products. This highlights a widespread consumer recognition of the value of simplified nutritional information at the point of purchase.

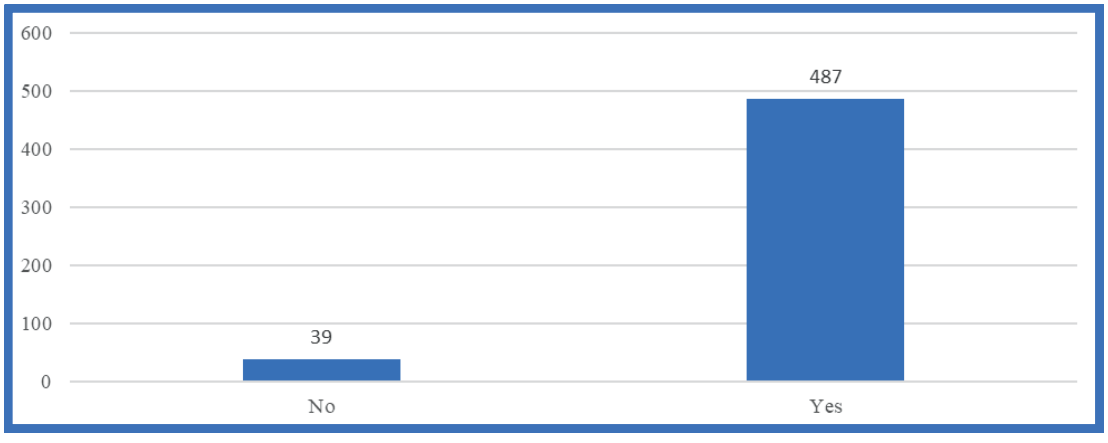
Consumers are often faced with time constraints and a wide array of choices when shopping, particularly in supermarkets or retail outlets. Traditional nutrition panels, typically found on the back of food packages, can be lengthy, complex, and difficult to interpret, especially for those with limited health literacy. In contrast, FOPL systems provide a quick and easily digestible summary of the product's healthfulness, making it easier for consumers to compare items and make healthier choices.

The feedback from participants suggests that consumers are not only interested in knowing what is in their food, but they also trust interpretive labels, such as Health Star Ratings, traffic light systems, or warning symbols, to guide them toward better decisions. Respondents expressed that these labels would act as a visible cue—helping them avoid products high in sugar, salt, or unhealthy fats and gravitate toward those with better nutritional profiles.

On the other hand, only 39 participants indicated that they do not believe FOPL would influence purchasing decisions. While this is a small minority, it is still important to consider this viewpoint. These respondents may already have fixed purchasing habits, may rely on taste or brand loyalty over nutrition, or perhaps feel confident enough in their existing knowledge to assess product healthiness without additional front-of-pack cues.

Nonetheless, the findings underscore the significant potential of FOPL as a behavioural tool. In a market like Fiji, where non-communicable diseases (NCDs) are on the rise, the introduction of effective FOPL systems could be a critical step toward promoting healthier eating patterns. The results affirm that consumers are likely to respond positively to FOPL implementation, and such a measure could play an essential role in shaping purchasing habits and improving public health outcomes.

Figure I: Can FOPL Influence Consumers Purchasing Decision?



SECTION 5: HEALTH AWARENESS

This section of the survey aimed to explore the extent to which consumers are conscious of their health and how this awareness may influence their dietary habits. Understanding the level of health awareness is critical in evaluating the potential impact of front-of-pack labelling (FOPL), as informed and health-motivated consumers are more likely to utilize such tools when making food choices.

COMMITMENT TO HEALTHIER LIVING

When asked if they were currently trying to follow a healthier diet, 442 respondents (approximately 83%) answered yes, indicating a high level of dietary self-awareness. This trend reflects a promising foundation for nutrition-focused behavioural interventions. It suggests that public health messaging—particularly around non-communicable diseases (NCDs)—has gained traction in Fiji, aligning with evidence from countries undergoing similar nutrition transitions (Popkin et al., 2020).

The proactive dietary efforts among respondents may be driven by:

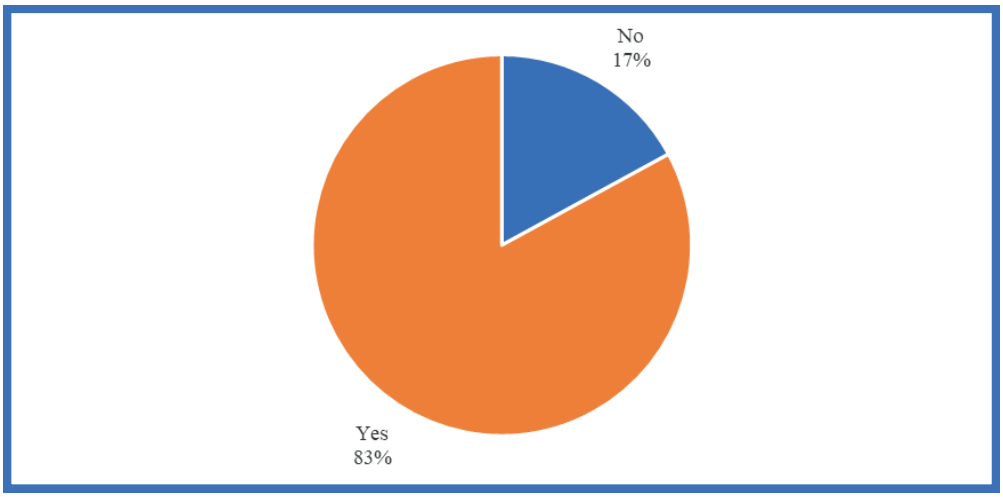
- Increased media coverage of NCDs and health risks;
- Greater access to online and community-based health information;
- Personal or familial experiences with diabetes, cardiovascular disease, or obesity.

Conversely, 17% of respondents (91 individuals) reported not attempting to follow a healthier diet. This subgroup may represent those who face structural and socio-economic constraints such as:

- Limited affordability or availability of healthier food alternatives;
- Inconsistent nutrition literacy or confusion over what constitutes a "healthy diet";
- Cultural norms or traditional diets high in starches, fats, and sugars.

The significant share of the population already inclined toward healthier eating indicates fertile ground for the introduction of interpretive FOPL systems. For less-engaged groups, FOPL can act as a passive yet persistent cue to rethink dietary habits—particularly when reinforced through broader education and outreach.

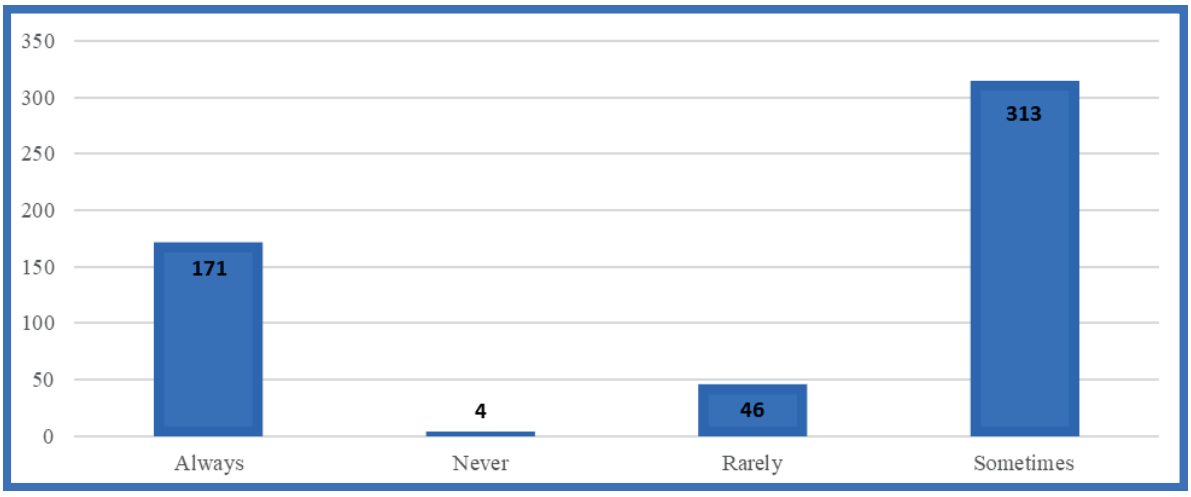
Figure J: Consumers Trying to Follow a Healthier Diet



CONSIDERING HEALTH IMPACTS OF PROCESSED FOOD IN PURCHASING DECISIONS

In assessing the depth of health consciousness among consumers, the Council also explored whether individuals consider the health impacts of processed foods when making purchasing decisions. The findings reveal a varied pattern of behaviour. A significant number—313 participants—indicated that they sometimes take health impacts into account, suggesting a moderate level of health awareness that may be situational or dependent on available options and time constraints. Meanwhile, 171 participants stated that they always consider the health effects of processed foods, reflecting a strong commitment to maintaining healthier dietary habits. On the other end of the spectrum, 46 respondents admitted to rarely considering such impacts, while 4 participants reported that they never take health consequences into account when purchasing processed foods. These figures indicate that while there is a growing consciousness around health and diet, a considerable portion of the population still requires further education and motivation to consistently factor health outcomes into their food choices—an area where front-of-pack labelling (FOPL) could play a crucial role.

Figure K: Health Impact Considerations



PERCEIVED ROLE OF FOPL IN REDUCING NCD RISK

To assess the perceived public health value of Front-of-Pack Labelling (FOPL), survey respondents were asked whether they believed such a system could help reduce the risk of non-communicable diseases (NCDs). The responses were strongly supportive:

- 332 respondents (62%) believed FOPL would be very helpful;
- 190 respondents (36%) considered it somewhat helpful;
- 10 respondents (2%) believed it would not be helpful.

This overwhelming endorsement aligns with a growing body of international research showing that interpretive FOPL systems are among the most cost-effective, scalable interventions for reducing diet-related NCD risks (Cecchini & Warin, 2016; WHO, 2023). The World Health Organization (WHO) and the Codex Alimentarius Commission both recommend FOPL as a core component of national nutrition strategies, particularly in contexts with high NCD burdens and low-to-moderate levels of nutrition literacy.

Why FOPL Matters for NCD Prevention

Evidence from multiple countries shows that FOPL improves both comprehension and behavioural outcomes:

- A 2022 systematic review in The Lancet Public Health found that interpretive labels such as warning signs, traffic lights, and star ratings improve consumers' ability to identify healthier products by up to 60% (Croker et al., 2022).
- Studies in Chile and Mexico showed that nutrient warning labels led to declines in the purchase of sugary beverages and ultra-processed foods within 12 months of implementation (Taillie et al., 2020; Kanter et al., 2021).
- FOPL schemes also pressure manufacturers to reformulate products to avoid negative labelling—lowering sugar, sodium, and trans fats to improve label ratings and market appeal (Acton et al., 2019).

These global lessons are highly relevant for Fiji, where high rates of diabetes (30.1% adult prevalence), cardiovascular disease, and obesity have placed immense strain on public health systems (Ministry of Health and Medical Services, 2022). Dietary risk factors—including excess sugar, saturated fats, and salt—are among the leading contributors to premature mortality and morbidity in the Pacific region (Global Burden of Disease Study, 2019).

Understanding the "Somewhat Helpful" Group (36%)

The 190 respondents who viewed FOPL as "somewhat helpful" represent a crucial demographic for future health interventions. Their cautious optimism may reflect:

- A recognition of FOPL's value in principle, but uncertainty about its impact in real-world settings;
- Concerns over inconsistent implementation across product categories or retail settings;
- Limited trust in food label accuracy or in the enforcement capacity of regulators.

Behavioural research indicates that even well-designed labels can fail if introduced without a supportive ecosystem that includes:

- Consumer education on how to interpret FOPL (e.g. through schools, clinics, social media, and community outreach);
- Standardisation across all packaged food products, including imports and local brands;
- Complementary measures such as restrictions on misleading health claims, point-of-sale signage, and media campaigns (Grunert et al., 2010; WHO, 2021).

Addressing these concerns will be critical to ensuring that FOPL achieves its intended outcomes across diverse consumer segments.

The Sceptical Minority (2%)

Only 10 respondents were unconvinced of FOPL's potential, highlighting a small but important minority. This group may reflect:

- Low health or nutrition literacy, limiting their ability to engage with labels;
- Label fatigue or scepticism, especially in environments saturated with conflicting food messages;
- A belief that other interventions—such as sugar taxes, subsidies for fresh produce, or reformulation mandates—are more impactful.

These perspectives underscore the importance of multi-pronged NCD strategies, where FOPL is not seen as a silver bullet, but as part of a wider ecosystem of structural and behavioural interventions (Mazziotta et al., 2023).

The findings demonstrate broad-based public support for FOPL in Fiji and reinforce its relevance as a national strategy to address NCDs. The evidence base supports three core policy priorities:

1. Integrate FOPL into the national NCD response: FOPL should be embedded in the implementation of the National NCD Strategic Plan 2022–2030, alongside fiscal, regulatory, and public education interventions.
2. Accompany FOPL rollout with targeted education: Tailored campaigns must address different literacy levels and cultural contexts, ensuring that FOPL is not just visible, but meaningful and trusted.
3. Adopt a phased, evidence-led implementation: Focus initial efforts on high-consumption categories (e.g. sugary beverages, processed snacks), monitor consumer and industry response, and expand based on evaluation results.

In sum, FOPL represents a high-leverage, equity-sensitive intervention—capable of empowering consumers, guiding reformulation, and reducing the long-term burden of chronic disease. The survey findings offer strong public mandate for its adoption, with the potential to create enduring health gains across Fijian society.

SECTION 6: OTHER QUESTIONS

The Council proceeded to end the consumer's questionnaire with 'What additional information or improvements would you like to see on food packaging to support your decision-making' to which the responses revealed that;

Consumers provided a diverse range of suggestions aimed at improving food packaging to better support informed decision-making. A dominant theme across responses was the visibility and clarity of expiry dates, with numerous participants expressing that expiry dates should be printed in bold, capital letters, in larger fonts, and clearly placed at both the front and back of packaging. Some even suggested having expiry dates accompanied by packaging dates to allow consumers to determine the shelf life of a product. Several respondents were concerned about expired products being kept on shelves and recommended stricter enforcement to remove such items.

Participants also emphasized the need for clear, simple, and understandable labelling, especially for senior citizens and those with limited literacy or language proficiency. There was a call for the use of plain English and inclusion of Fijian and Hindi translations. Consumers felt that nutritional labels should avoid technical jargon and instead use everyday language. Bold prints, warning symbols, and the use of colour coding (such as health star ratings or traffic light systems) were suggested to make important information stand out. There was particular interest in labels that display key nutritional facts such as sugar, calorie, fat, and sodium content in a straightforward format, along with recommended portion sizes and suggested serving methods.
Some respondents suggested enhancements such as halal certification stamps, vegetarian/vegan indicators, and allergen warnings to cater to diverse dietary and religious needs. There were also calls for greater transparency regarding ingredient sourcing, ethical certifications like fair trade or organic status, and environmental information such as sustainable farming practices and eco-friendly packaging materials.

A few participants wanted packaging to go beyond just safety and nutrition by including health-related warnings (similar to cigarette packages), particularly regarding the potential long-term risks of consuming certain products, including the development of NCDs. Others proposed the inclusion of QR codes linking to more detailed product information online, and some mentioned the importance of product traceability—such as batch numbers, origin of ingredients, and production details.

Several consumers stressed the need for effective packaging that preserves quality and prevents spoilage, especially for perishable goods like meat and bread. A small number voiced concerns about unethical practices like using waste materials in processed foods, poor storage conditions in stores (e.g., frequent switching off of coolers), and deceptive branding. They recommended stronger oversight and consistent quality controls from manufacturers, suppliers, and supermarkets.

Overall, the responses reflect a strong desire for transparency, clarity, and practicality in food packaging, with a focus on enabling healthier choices, improving product safety, and catering to diverse consumer needs across language, health, and dietary preferences.

RESPONSES FROM MANUFACTURERS & DISTRIBUTORS

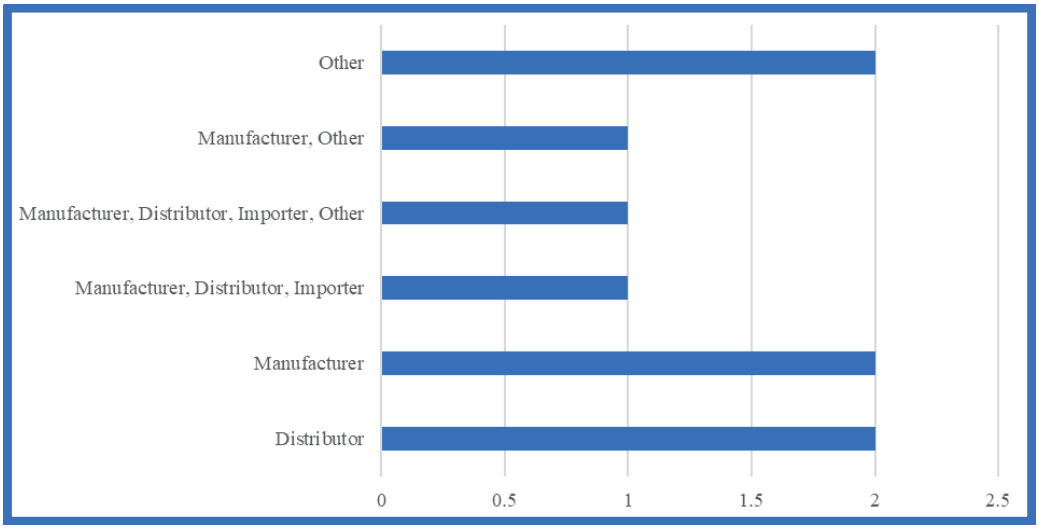
SECTION 7: BUSINESSES PROFILING

Type of Business

The Council gathered data from businesses located in the Central and Western Divisions of Fiji, as these regions house the majority of key players in the food supply chain. The Northern Division was not included in this aspect of the study due to the absence of major manufacturers or distributors operating at a national level. The businesses surveyed represented a cross-section of the industry, offering insight into various roles across the food production and supply process.

Specifically, the data collected included responses from two businesses that identified solely as distributors, focusing primarily on the supply and delivery of food products to retail outlets. Another two respondents identified as manufacturers, whose operations involve the production and packaging of food items for consumer consumption. One business operated as a manufacturer, distributor, and importer, indicating involvement in producing food products locally, importing goods from abroad, and distributing both to retailers. Another respondent fell into the category of manufacturer, distributor, importer, and "other," suggesting additional business functions such as repackaging or wholesaling. Lastly, one business identified as a manufacturer and "other," likely referring to an entity involved in manufacturing and secondary services such as branding or labelling. This mix of business types provided a well-rounded understanding of the practices, perspectives, and challenges related to food labelling and packaging within Fiji's processed food sector.

Figure L: Types of Businesses



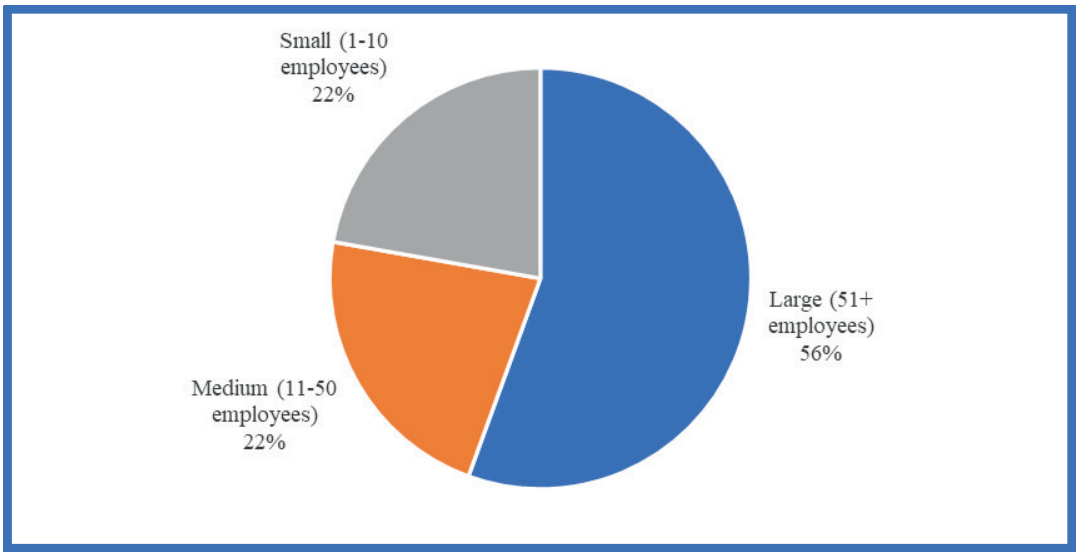
Size of the Business

From the data collected, the Council observed that five businesses categorized themselves as large-scale operations. These large businesses typically have broader operational capacities, including extensive manufacturing facilities, wider distribution networks, and access to greater financial and technical resources. They are more likely to have structured departments for product development, compliance, and marketing, which positions them well to adopt initiatives such as front-of-pack labelling (FOPL) with relative ease.

In addition to the large businesses, two businesses identified themselves as medium-sized and another two as small. Medium-sized businesses often operate at a regional level with moderate production and distribution capabilities. They may have some dedicated staff for packaging and labelling but could face financial or logistical limitations in redesigning product packaging to incorporate FOPL elements.

Small businesses, on the other hand, usually operate at a local scale, with limited product lines and minimal staffing. Their primary focus may be on sustaining daily operations, which could make it challenging for them to invest in new labelling systems or comply with additional packaging requirements unless simplified, low-cost guidelines are introduced. The feedback from these different business sizes offers important insight into how voluntary FOPL guidelines might be implemented in a phased or flexible approach to accommodate varying capacities across the food sector.

Figure M: Size of Business



Types of Products Handled

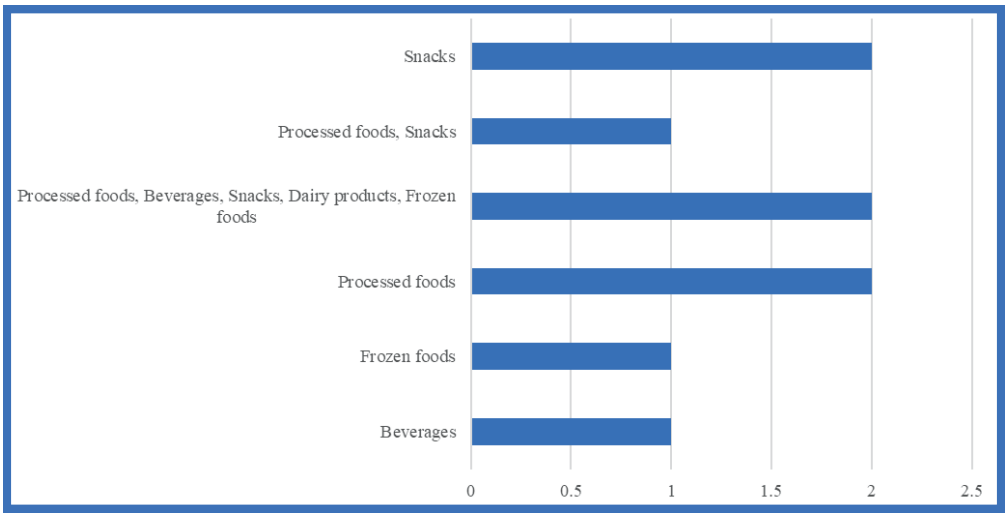
From the responses gathered, it was noted that the participating businesses were involved in handling a diverse range of food products, highlighting the breadth of items circulating within Fiji's local food supply chain. One company focused exclusively on beverages, which may include soft drinks, bottled juices, or other ready-to-drink products. Another company dealt specifically with frozen goods—likely encompassing frozen meats, vegetables, or ready-made meals—which require cold storage and are typically packaged with longer shelf lives.

Two companies reported that they handled only processed foods, which are foods that have been altered from their natural state through methods such as canning, cooking, freezing, or adding preservatives. These products can range from canned vegetables and noodles to pre-packaged meals.

In addition, two businesses indicated involvement in multiple categories—processed foods, beverages, snacks, dairy products, and frozen goods—suggesting that they are larger enterprises with a wider product portfolio. Their operations may include manufacturing and distributing a variety of items that span multiple food categories, which also implies greater responsibility in terms of packaging, labelling, and regulatory compliance.

One business reported its focus on processed foods and snacks. This suggests a product mix that combines shelf-stable packaged items like chips, biscuits, or energy bars with more substantial processed food products. Lastly, two companies specialized solely in snacks. These products are typically high-turnover items in supermarkets and convenience stores and may include both locally produced and imported goods such as chips, crackers, confectioneries, and other ready-to-eat items. This distribution of product categories highlights the variety in the Fijian food market and indicates that any front-of-pack labelling (FOPL) initiative would need to consider the specific nature of the products handled—especially since different food types may require different approaches to labelling due to packaging size, storage conditions, or nutritional concerns.

Figure N: Type of Products Handled



SECTION 8: CURRENT LABELLING PRACTICES

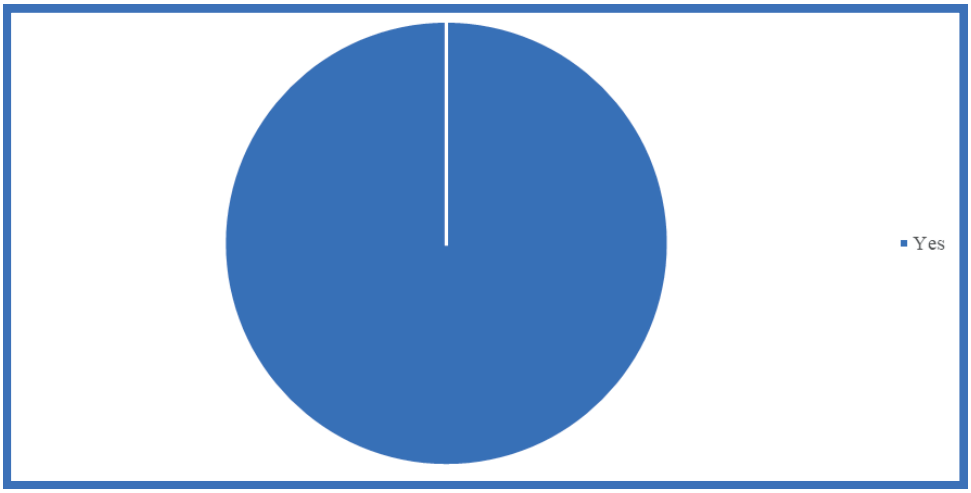
INCLUSION OF NUTRITIONAL LABELS ON PRODUCTS

All businesses surveyed—whether manufacturers, distributors, or importers—confirmed that their products included some form of nutritional labelling. This widespread presence reflects a foundational level of compliance with the Food Safety Act 2003 and its accompanying Regulations (2009), which mandate key food labelling elements such as nutritional composition, ingredient lists, expiry dates, and product identity. The results signal a positive baseline for labelling infrastructure in Fiji's food sector and suggest general industry awareness of the importance of consumer-facing information.

However, while inclusion of nutritional labels is encouraging, it does not equate to effectiveness. Research consistently shows that label presence alone is insufficient if the format is dense, technical, or difficult to interpret (Campos et al., 2011; Hawley et al., 2013). Many of the surveyed businesses acknowledged variability in presentation—such as font size, language clarity, or location on packaging. For example, smaller font sizes and scientific jargon often render labels inaccessible to consumers with limited literacy or numeracy, a challenge that disproportionately affects rural and vulnerable populations in Fiji (UNICEF Pacific, 2021).

Thus, although existing practices meet formal regulatory expectations, they fall short of enabling consumer understanding and behavioural change. This finding strongly reinforces the case for adopting a simplified, standardised, and highly visible Front-of-Pack Labelling (FOPL) system to complement existing back-of-pack formats and improve usability for all consumers.

Figure O: Including Information on Products



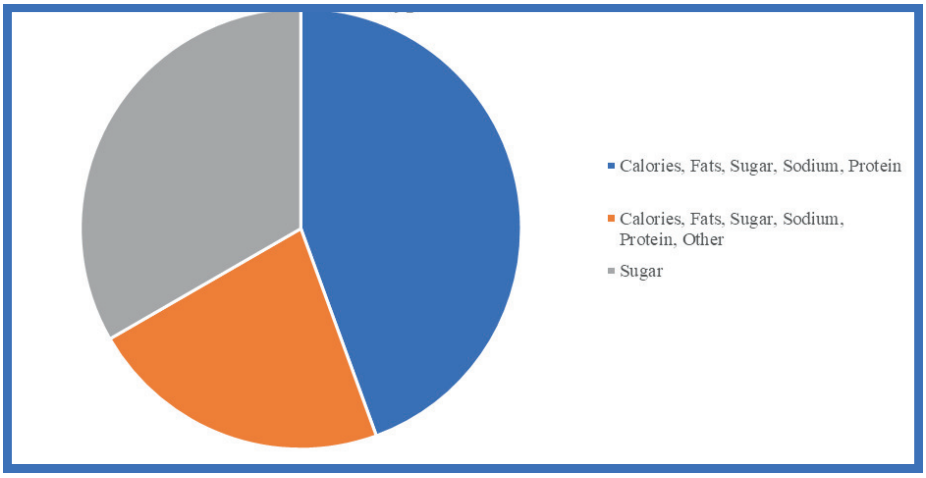
Information Provided on the Labels

Surveyed businesses provided varying levels of detail on the types of nutritional information displayed:

- Four businesses consistently reported including core nutrients such as calories, fats (total and saturated), sugar, sodium, and protein—which align with international best practice indicators associated with NCD risk factors (WHO, 2023).
- Two businesses noted inclusion of "other" nutritional elements—likely fibre, vitamins, minerals, or allergen statements—suggesting more detailed disclosure practices.
- Three businesses specifically emphasised the inclusion of sugar content, reflecting heightened awareness of sugar-related health risks and shifting consumer demand for transparency in this area.

This level of disclosure, while commendable, still presents challenges in consistency and comparability across brands and product types. The lack of a unified presentation format undermines the usefulness of this information, especially in low-literacy environments or for time-constrained consumers. Studies from Latin America and the Pacific have shown that inconsistent and non-interpretive labelling limits its influence on consumer decision-making (Taillie et al., 2020).

Figure P: Types of Information



Awareness of Food Safety Requirements

All businesses surveyed demonstrated familiarity with the Food Safety Act 2003 and the associated Food Safety Regulations 2009, including provisions specific to labelling. This includes legally mandated information such as:

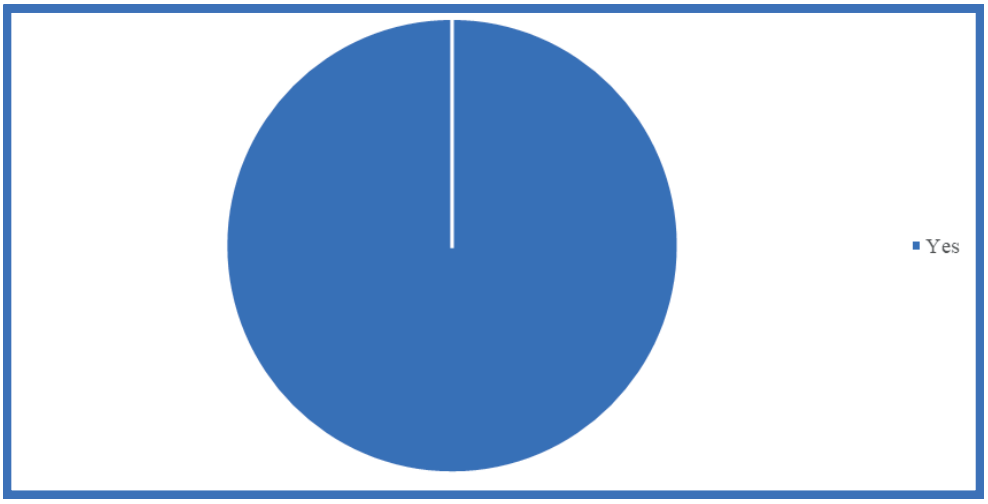
- Name of the food product
- Ingredients listed in descending order by weight
- Nutritional composition
- Date markings (best before/expiry)
- Allergen declarations
- Storage conditions

Such widespread regulatory awareness is a positive sign of baseline industry engagement and is likely a result of regular inspections, customs enforcement, or business registration processes involving health licensing requirements.

However, awareness alone does not ensure optimal practice or consumer comprehension. The Council's concurrent audits and market inspections indicate that while many products are technically compliant, they still fall short of meaningful engagement due to illegible fonts, poor label contrast, or overwhelming technical detail.

This disconnect highlights the difference between legal compliance and public health impact. The current regime's reliance on back-of-pack labelling formats—while important—is insufficient in light of increasing NCD prevalence, limited health literacy, and an increasingly processed food environment.

Figure Q: Being Aware of the Food Safety Requirements

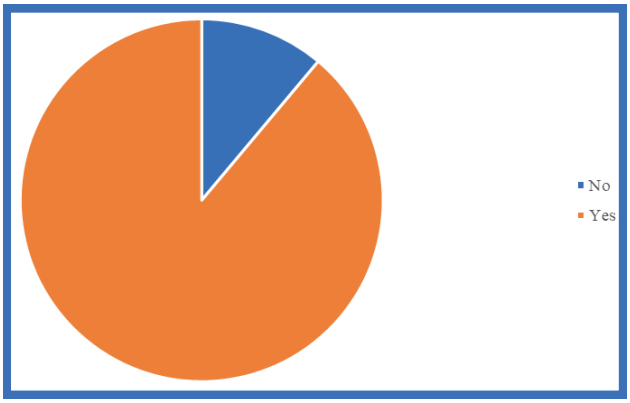


SECTION 9: FRONT OF PACK LABELLING PERCEPTION

FAMILIARITY WITH FRONT OF PACK LABELLING

Among surveyed businesses, 8 out of 9 indicated familiarity with Front-of-Pack Labelling (FOPL), signalling a promising level of industry awareness. FOPL refers to simplified, interpretive nutritional information presented prominently on the front of packaged food products—designed to enable quicker, healthier decision-making at the point of purchase (WHO, 2023).

Figure R: Familiarity with FOPL



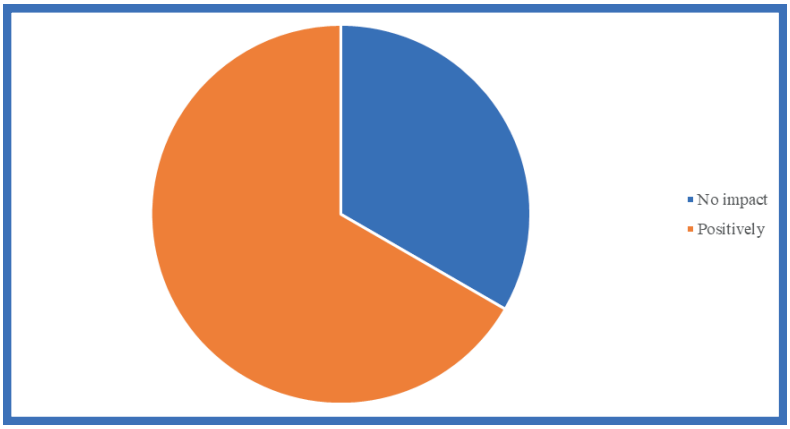
This familiarity suggests that a large portion of Fiji's food manufacturing and distribution sector is already attuned to global trends in consumer health information systems. FOPL systems such as Health Star Ratings, traffic light labels, and nutrient-specific warnings are now widely adopted in countries such as Australia, Chile, and the UK (Hammond et al., 2016; Taillie et al., 2020). Their growing adoption reflects a shift in policy from purely informational back-of-pack labels (BOPLs) to interpretive tools that reduce cognitive overload for consumers (Campos et al., 2011).

However, the one business unfamiliar with FOPL illustrates that awareness is not universal. This gap underscores the need for capacity-building initiatives across all segments of the food supply chain, especially among smaller enterprises or those not engaged in international trade. Educational outreach by regulators and industry bodies can play a vital role in ensuring that even less-exposed businesses are equipped to engage with voluntary or mandatory FOPL frameworks.

How can FOPL impact your product's marketability?

In response to the question on whether Front-of-Pack Labelling (FOPL) could impact their product's marketability, 6 businesses expressed that FOPL would have a positive impact on the marketability of their products. These businesses highlighted that incorporating clear and simplified nutritional information on the front of packaging can enhance consumer trust and confidence. With increasing health awareness among consumers, especially those consciously seeking healthier food choices, products with transparent front-of-pack information are more likely to stand out on shelves and influence purchasing decisions. These respondents viewed FOPL as a marketing tool that could potentially improve brand perception, support consumer loyalty, and differentiate their products from competitors, particularly in a saturated or health-conscious market. On the other hand, 3 businesses stated that FOPL would have no impact on marketability. These businesses may believe that other factors such as brand loyalty, pricing, availability, or taste take precedence in consumers' purchasing decisions. They may also operate in product categories where nutritional value is not a major selling point, or may cater to a market segment that is less influenced by health labels. Some businesses might also feel that since they already comply with existing labelling laws under the Food Safety Act 2003, adding front-of-pack labels would be redundant or have minimal influence on sales performance.
Overall, the majority responses support the idea that FOPL can serve as a value-adding feature in food marketing, particularly as consumer preferences shift toward healthier and more transparent food options. This reflects an openness among businesses to adopt FOPL as part of their broader marketing and product presentation strategies.

Figure S: Impact of FOPL on Product Marketability



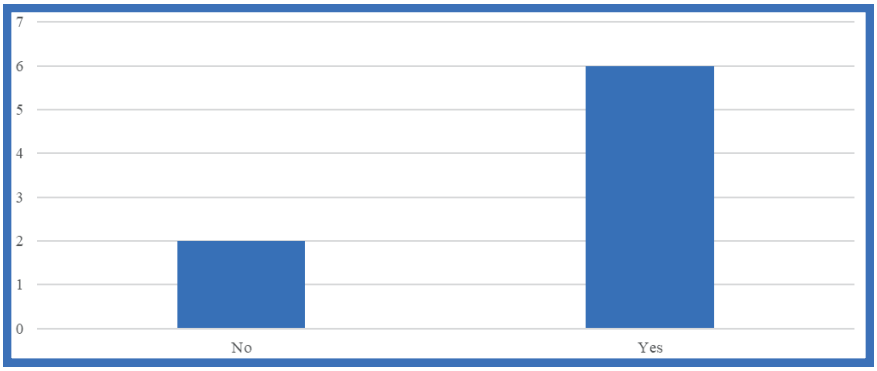
Would Businesses be Willing to Adopt Voluntary FOPL Guidelines for Products?

In response to whether they would be willing to adopt voluntary Front-of-Pack Labelling (FOPL) guidelines, 6 businesses expressed a willingness to do so, indicating a strong level of support for initiatives that promote consumer health and product transparency. These businesses acknowledged that voluntary FOPL can serve as a proactive measure to inform consumers about the nutritional content of food products and empower them to make more informed dietary choices. Their readiness to implement such guidelines reflects an understanding of growing consumer demand for healthier options and clearer labelling.

Some also likely recognised the reputational and competitive advantages that could arise from being early adopters of a consumer-centric labelling approach. On the other hand, 2 businesses stated they were not willing to adopt the voluntary guidelines. While the reasons were not explicitly provided, possible factors for reluctance may include concerns over the costs involved in re-designing packaging, limited capacity or resources, perceived lack of necessity, or the belief that current mandatory labelling requirements are sufficient. There may also be apprehensions about how FOPL might influence consumer perception, especially if the product is not particularly healthy. One business did not provide a response to this question, which could be attributed to uncertainty about the guidelines, lack of knowledge about FOPL, or a hesitation to commit without further information.

Overall, the responses indicate a generally positive outlook towards voluntary FOPL adoption among businesses, especially larger or more health-conscious ones, while also highlighting that some resistance remains, particularly among those who may perceive implementation as burdensome or unnecessary in the absence of a regulatory mandate.

Figure T: Adopting Voluntary FOPL Guidelines



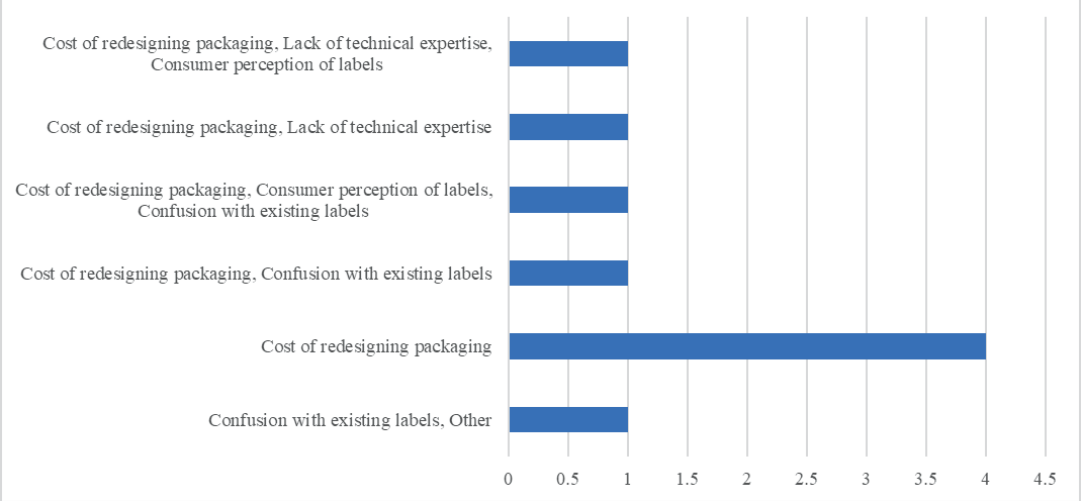
Challenges Businesses Foresee in Implementing FOPL on their Products

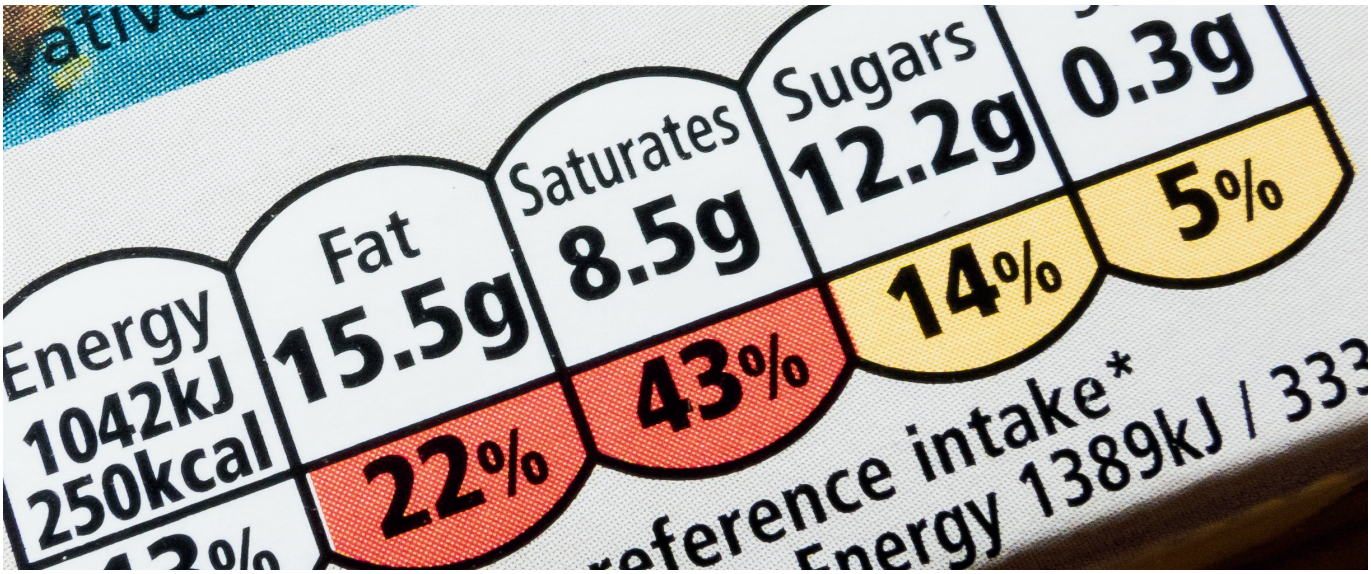
The challenges businesses foresee in implementing Front-of-Pack Labelling (FOPL) on their products, as gathered from the responses, highlight a range of concerns that are not only technical but also related to cost, consumer perception, and the existing labelling system. Here's a detailed breakdown of these challenges:

1. Confusion with Existing Labels: One business cited confusion stemming from the current labelling system, which may already be complex or unclear for consumers. This could cause a challenge when introducing new FOPL systems, as businesses may struggle with integrating these new labels without causing further confusion. Additionally, there could be a clash with existing industry norms or regulations regarding how products are labelled, leading to a transition period where both consumers and businesses might need to adapt.
2. Cost of Redesigning Packaging: Several businesses highlighted the cost of redesigning packaging as a significant challenge. This involves not only the financial cost of developing new designs but also the logistical costs of changing production lines, printing new labels, and ensuring that the new packaging complies with regulations. For businesses, particularly smaller ones, these costs can be prohibitive, especially if they have limited budgets or are already dealing with other financial pressures.
3. Consumer Perception of Labels: One response emphasized the concern about how consumers will perceive the new labels. Businesses fear that the implementation of FOPL might lead to misinterpretations by consumers. For instance, a "healthier" label might be perceived as a marketing gimmick or cause confusion about what is actually healthy. Some businesses may worry that this could lead to a negative impact on their sales if consumers don't fully understand or trust the new labelling system.
4. Lack of Technical Expertise: Another challenge mentioned was the lack of technical expertise in terms of creating labels that meet regulatory standards. Businesses may not have the necessary knowledge to ensure that the labels are compliant with the required regulations. This might involve understanding complex nutritional information, designing labels that are visually effective, and making sure that they accurately reflect the content and claims of the product. The lack of this expertise can lead to errors, fines, or delays in implementing the labelling system.

In summary, businesses are primarily concerned with the financial costs of redesigning packaging, the potential for consumer confusion, the perception of labels as marketing tools, and the lack of technical know-how to comply with the requirements of a new labelling system. Addressing these concerns through education, support, and clear guidelines may help facilitate smoother implementation of FOPL.

Figure U: Challenges





SECTION 10: READINESS OF VOLUNTARY FOPL GUIDELINES

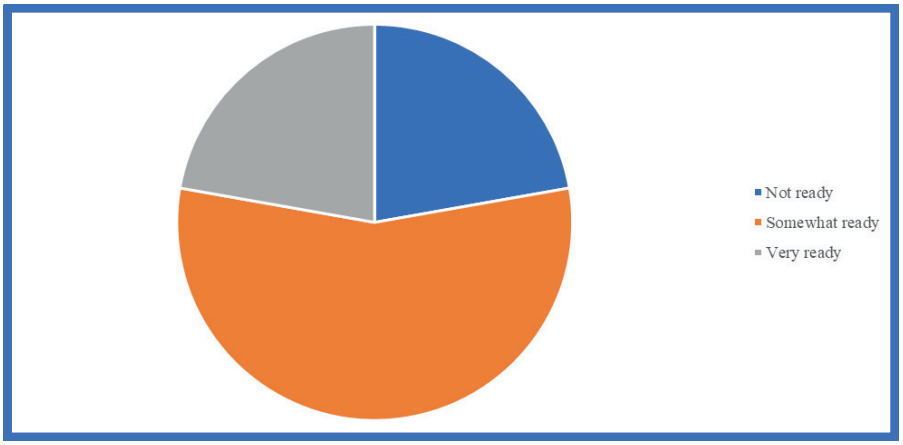
Readiness of Business in adopting voluntary FOPL Guidelines

The readiness of businesses to adopt the voluntary Front-of-Pack Labelling (FOPL) guideline reflects varying levels of preparedness and willingness to implement the system. Here's a detailed breakdown of the responses:

1. Somewhat Ready (5 businesses): 5 businesses expressed that they are "somewhat ready" to adopt the voluntary FOPL guideline. This suggests that while they are open to the idea and are aware of the importance of FOPL, they may face some challenges that are preventing full readiness. These businesses could be in the early stages of understanding the guidelines or are still assessing the potential impact on their operations. For example, they might be waiting for further clarity on regulatory requirements, the availability of technical support, or the cost of redesigning packaging. These businesses may be willing to proceed with implementing FOPL but require additional resources, information, or time to do so effectively.
2. Not Ready (2 businesses): 2 businesses indicated that they are not ready to adopt the voluntary FOPL guideline. This suggests a more significant level of reluctance or difficulty in preparing for the change. These businesses might be concerned about the costs involved in redesigning packaging, lack of internal expertise, or challenges in aligning their products with the new labelling standards. They could also be hesitant due to concerns over consumer reception or unclear guidelines. These businesses may need more time, support, or incentives to make the necessary adjustments and become fully ready to implement FOPL.
3. Very Ready (2 businesses): 2 businesses stated that they are very ready to adopt the voluntary FOPL guideline. These businesses are likely already in alignment with the principles of FOPL or have already taken steps to incorporate it into their products. They may have a clear understanding of the regulatory requirements, the potential benefits of FOPL (such as improved consumer trust and market differentiation), and the resources necessary to implement it. These businesses are proactive and committed to the adoption of FOPL, possibly viewing it as a strategic advantage or an essential step in enhancing consumer information and product transparency.

The readiness of businesses to adopt FOPL varies significantly, with the majority indicating they are somewhat ready but still facing challenges in implementation. A smaller portion is either fully prepared or not yet ready, highlighting that businesses are at different stages of understanding and adapting to the guidelines. These varying levels of readiness suggest that more engagement, support, and education might be needed to help businesses fully transition to the new labelling system.

Figure V: Readiness of Business in Accepting Voluntary Guidelines



Resources or Support Needed for Voluntary FOPL Guidelines

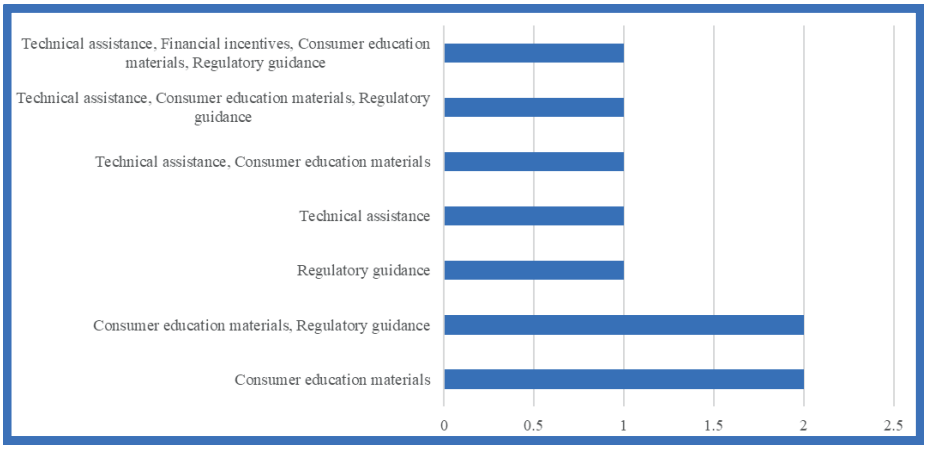
The responses from businesses regarding the support they require for adopting the voluntary Front-of-Pack Labelling (FOPL) guideline reveal the types of resources and assistance that businesses believe would help them in the process. Here's a detailed breakdown of these responses:

1. Consumer Education Materials (2 businesses): Two businesses specifically indicated that they require consumer education materials. This suggests that these businesses are concerned with how consumers will understand and interpret the new labels. These businesses might feel that their customers need guidance on what the labels mean and how to use the information effectively to make better purchasing decisions. They may want educational materials that explain the significance of FOPL and its benefits for health and consumer awareness.
2. Consumer Education Materials and Regulatory Guidance (2 businesses): Two businesses selected both consumer education materials and regulatory guidance. These businesses recognize the importance of educating consumers but also see a need for clear, authoritative guidance on the regulatory framework surrounding FOPL. They may be seeking direction on compliance with the guidelines, ensuring that their products meet the required standards while providing clear information to their customers. This combination of needs indicates that these businesses are concerned with both consumer understanding and the legal requirements of implementing the new labelling system.
3. Regulatory Guidance (1 business): One business specifically selected regulatory guidance, indicating that they may already have a general understanding of consumer education but require more detailed and specific information about the legal or regulatory framework for FOPL. This business may want clarification on the rules, standards, or deadlines for implementing FOPL to ensure compliance without risk of non-compliance penalties.
4. Technical Assistance (1 business): One business indicated that they require technical assistance. This business is likely seeking expertise or support in the practical aspects of implementing FOPL. This might include assistance with label design, ensuring that the labels comply with technical standards, or help with integrating nutritional information. This suggests that the business lacks in-house expertise or resources to handle the technical aspects of the new labelling system.
5. Technical Assistance and Consumer Education Materials (1 business): One business selected both technical assistance and consumer education materials. This business appears to need support in both the technical side of FOPL (such as design or regulatory compliance) and consumer-facing aspects (like ensuring consumers understand the new labels). This combination suggests that the business is looking for holistic support that addresses both internal implementation needs and external communication with consumers.

- Technical Assistance, Consumer Education Materials, and Regulatory Guidance (1 business): One business selected all three: technical assistance, consumer education materials, and regulatory guidance. This indicates that the business requires comprehensive support in all areas—helping them navigate the technical challenges, providing tools to educate consumers, and ensuring that they are fully informed about the legal and regulatory requirements for FOPL. This business likely views the implementation of FOPL as a complex task requiring a range of expert guidance and resources to ensure smooth adoption.
- Technical Assistance, Financial Incentives, Consumer Education Materials, and Regulatory Guidance (1 business): One business selected technical assistance, financial incentives, consumer education materials, and regulatory guidance. This suggests that the business recognizes the need for a complete package of support, including assistance with the technical aspects of FOPL, financial assistance to offset the costs of redesigning packaging or implementing new labelling systems, consumer education to help their customers understand the labels, and clear regulatory guidance to ensure compliance. This response highlights a more complex set of challenges, with the business likely facing significant costs or resource constraints in adopting FOPL and seeking support across multiple fronts.

The variety of responses shows that businesses are seeking different forms of support based on their unique needs and challenges. The most common requests include consumer education materials and regulatory guidance, indicating that businesses are concerned both with how to communicate the new labels to consumers and how to navigate the legal requirements. Additionally, there is a clear demand for technical assistance to help with the implementation and design of the labels. Some businesses are also seeking financial incentives to mitigate the costs of making these changes. This range of responses suggests that businesses require a combination of resources to successfully implement FOPL and ensure both consumer understanding and regulatory compliance.

Figure W: Resources or Support Needed for Voluntary FOPL Guideline



FOPL PREFERENCE MODEL

The data collected regarding businesses' preferences for Front-of-Pack Labelling (FOPL) systems reveals varying opinions on the types of labelling schemes they believe would be most beneficial. Here's a detailed breakdown of the responses:

- Health Star Rating (2 businesses): Two businesses specifically selected the Health Star Rating (HSR) system. The Health Star Rating is a label that provides an overall rating of the product's healthiness, usually on a scale of 0.5 to 5 stars. The idea behind this system is to make it easier for consumers to compare the healthiness of similar products. These businesses may believe that the simplicity and clarity of the HSR system would be effective in helping consumers make healthier choices. They might prefer this label because it provides a quick, easy-to-understand metric that could drive healthier purchasing decisions.
- Health Star Rating and Traffic Light Labels (2 businesses): Two businesses selected both the Health Star Rating and Traffic Light Labels. The Traffic Light Labels typically use a red, amber, and green color-coding system to indicate the level of a product's nutrients (such as fat, sugar, salt, etc.), with red indicating high levels, amber indicating medium levels, and green indicating low levels.

This combination of labels is seen as providing both an overall health rating (via the Health Star Rating) and a clear breakdown of individual nutrient levels (via the Traffic Light Labels). These businesses likely see value in offering consumers two types of information: an easy-to-understand star rating for an overall picture of healthiness, along with detailed, color-coded nutritional information to help consumers make informed decisions based on specific dietary needs.

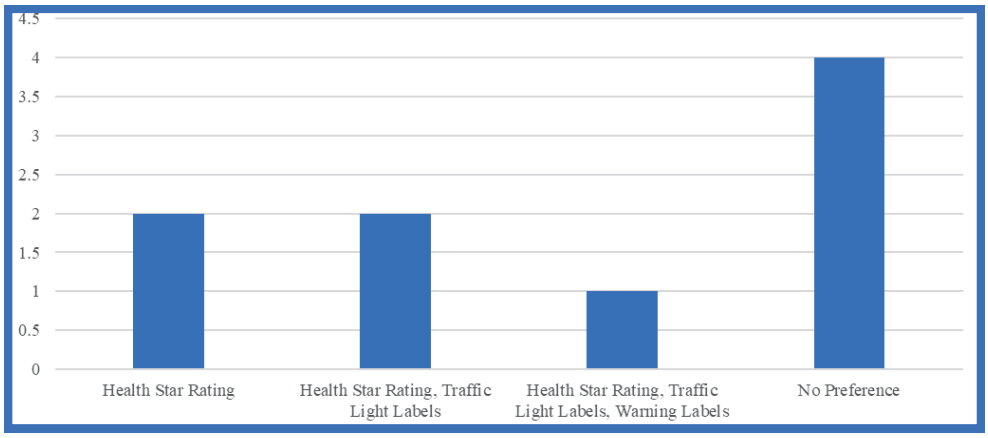
- Health Star Rating, Traffic Light Labels, and Warning Labels (1 business): One business selected Health Star Rating, Traffic Light Labels, and Warning Labels. In this case, the business is interested in a more comprehensive approach that not only provides an overall health rating and specific nutrient details but also includes warning labels. Warning labels typically highlight products that may pose health risks, such as high levels of sugar, fat, or salt. This business may feel that adding warning labels will better protect consumers by signaling potentially harmful products, especially those that fall into categories with high risks for non-communicable diseases (NCDs) or other health concerns. By combining these three systems, the business might aim to provide consumers with as much information as possible to make healthier and more informed choices.

- No Preference (4 businesses): Four businesses did not provide any preference regarding the type of label they would prefer. This lack of response could suggest several things:

-Uncertainty: These businesses might not yet have enough information about the different FOPL systems to make a decision.
-Lack of awareness: These businesses might not be fully aware of the various labelling options or their benefits and challenges.
-Neutral stance: Some businesses might not have a strong opinion on the specific labelling systems, indicating that they are open to any approach as long as it complies with the guidelines or regulations set forth by the authorities.

The responses show that businesses are generally in favor of providing clear, consumer-friendly labels to help people make healthier choices, with a strong preference for the Health Star Rating and Traffic Light Labels. These systems offer both an overall health rating and specific nutrient breakdowns, making it easier for consumers to compare products and understand their healthfulness. Some businesses are also open to the inclusion of warning labels to highlight potentially harmful products. However, a significant portion of businesses (4 out of 10) did not provide a preference, which may indicate a need for further education or clarity on the different labelling options available.

Figure X: FOPL Preference Model



SECTION 11: IMPACT ON BUSINESSES

ADOPTING FOPL WOULD INCREASE COST OF PRODUCTION

The responses regarding the impact of adopting Front-of-Pack Labelling (FOPL) on the cost of production reflect a mixed outlook among businesses, with the majority expressing concerns about potential cost increases. Here's a detailed explanation of the responses:

1. Yes, Adopting FOPL Would Increase the Cost of Production (6 businesses): Six businesses indicated that adopting FOPL would increase their cost of production. This suggests that these businesses anticipate several potential costs associated with implementing the new labelling system. The costs they foresee could include:

- Redesigning packaging: Businesses may need to invest in new packaging that accommodates the FOPL system, such as redesigning labels, changing graphics, and ensuring that the new labels comply with regulatory standards. This process often requires professional design services and additional printing costs.
- Technical adjustments: Implementing FOPL may require changes to the technical specifications of their products, including recalculating nutritional information or conducting lab tests to ensure that the labels accurately reflect the product's contents. These adjustments could require both time and resources, contributing to higher production costs.
- Regulatory compliance: There may be expenses related to ensuring compliance with the new labelling regulations, such as consultations with experts or legal advice to ensure the labels meet the required standards.
- Production line changes: If packaging or labelling machinery needs to be modified to accommodate the new FOPL system, businesses may face additional capital expenditures or operational disruptions.

These businesses may view the adoption of FOPL as a significant financial investment, leading them to believe that it will directly raise production costs, at least in the short term.

2. No, Adopting FOPL Would Not Increase the Cost of Production (2 businesses): Two businesses stated that adopting FOPL would not increase the cost of production. These businesses may have already integrated aspects of FOPL or similar labelling practices into their existing processes. Possible reasons why these businesses don't anticipate a cost increase include:

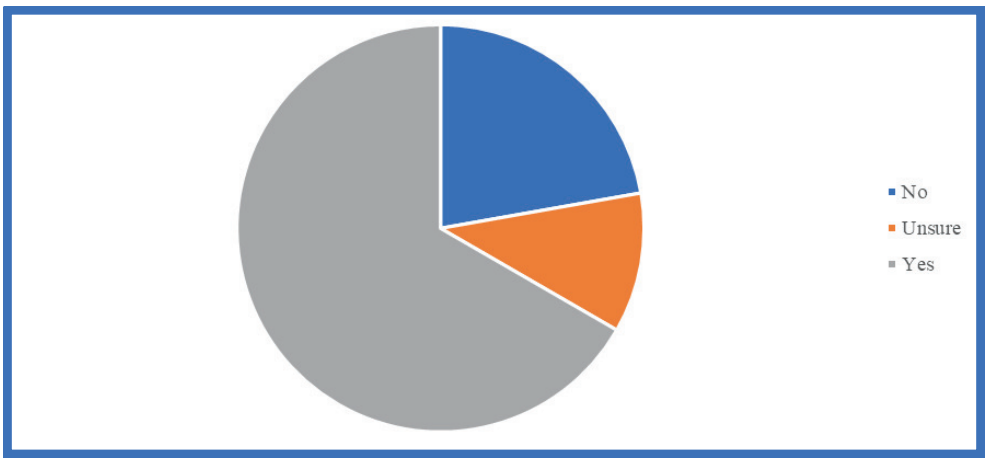
- Minimal changes required: For some businesses, adopting FOPL might not require significant changes to their existing packaging or labelling. They might already have products with labels that are close to or compliant with FOPL standards, so the transition could be relatively inexpensive.
- Efficiency gains: These businesses might anticipate that adopting FOPL could streamline certain operations, such as improving product differentiation or enhancing consumer trust, leading to long-term benefits that outweigh any initial costs.
- Preparedness: Some businesses might have already planned for such changes or have built the costs into their overall pricing strategy, meaning they don't foresee a major financial impact from adopting the new labelling system.

3. Unsure (1 business): One business indicated that they were unsure whether adopting FOPL would increase their cost of production. This response likely reflects a lack of clarity or certainty about the practical aspects of adopting FOPL. The business might be:

- Awaiting more information: This business may still be gathering data on the potential costs or benefits of FOPL and has not yet reached a conclusion on how it would impact their production costs.
- Concerns about unknowns: The business might be uncertain about how the labelling system will be implemented in practice, what regulatory requirements they will need to meet, and how these factors will affect their production processes. They may need more time or guidance to assess the true financial impact.

The majority of businesses (6 out of 9) believe that adopting FOPL would increase their production costs, mainly due to expenses related to redesigning packaging, ensuring regulatory compliance, and making technical adjustments. However, a minority of businesses (2 out of 9) do not anticipate any increase in production costs, possibly because they believe their current systems are already close to FOPL standards or because they expect efficiency gains. One business is unsure about the financial impact, indicating a need for further information or clarification. Overall, businesses are concerned about the costs of implementing FOPL, though some feel confident that these costs will be manageable or negligible.

Figure Y: Would Adopting FOPL Increase COP?



IMPACT OF FOPL ON SALES

The responses regarding the impact of Front-of-Pack Labelling (FOPL) on sales reveal differing perspectives among businesses, with some anticipating no effect on sales, while others believe that adopting FOPL could lead to increased sales. Here's a detailed breakdown of the responses:

1. No Impact on Sales (4 businesses): Four businesses indicated that adopting FOPL would not have an impact on their sales. These businesses might believe that the introduction of FOPL would not significantly alter consumer purchasing behavior for several reasons:

- Consumer habits: These businesses may feel that their target customers are not strongly influenced by labelling changes or that their existing customer base already makes purchasing decisions based on factors other than labels, such as price, brand loyalty, or product availability.
- Labeling familiarity: Some businesses might already use labelling systems similar to FOPL, so the new labels might not be seen as a significant change that would affect their sales. Consumers may already be accustomed to reading labels and making purchasing decisions based on that information.
- Lack of direct correlation: These businesses could believe that FOPL is more of a regulatory compliance measure rather than a marketing tool that drives sales. They might not see a direct link between adopting FOPL and consumer purchase behavior, particularly if they perceive the new labels as more of a necessity than a selling point.
- Target market considerations: For certain types of products, such as budget or value-based items, the emphasis might be on price rather than health claims. These businesses may feel that consumers are more focused on affordability than nutritional information provided through FOPL.

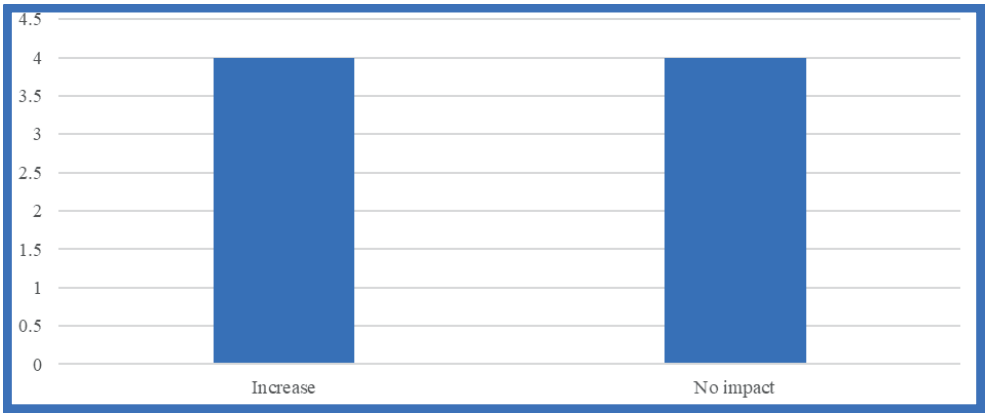
2. Increase in Sales (4 businesses): Four businesses, on the other hand, indicated that adopting FOPL would likely lead to an increase in sales. These businesses may believe that providing clearer, health-oriented information through FOPL can be a marketing tool that attracts more consumers. Possible reasons for this belief include:

- Health-conscious consumers: As health awareness increases, many consumers are looking for products that align with their health goals, such as products that are lower in sugar, fat, or salt. FOPL could make it easier for these consumers to make informed choices, thereby driving sales for products that meet their health criteria.
- Product differentiation: Businesses may see FOPL as a way to differentiate their products in the market, particularly if they are offering healthier or more nutritious options. The addition of clear, standardized labelling could make these products stand out to consumers who are actively seeking healthier alternatives.
- Transparency and trust: Some businesses might believe that adopting FOPL will increase consumer trust by providing transparent, easily understandable information. Consumers may feel more confident purchasing products that offer clear labelling, especially in markets where health and nutrition are key concerns.
- Appealing to health trends: FOPL could also tap into larger health and wellness trends. By adopting the labelling system, businesses might be positioning themselves as forward-thinking and committed to promoting healthier lifestyles, which could boost their sales among consumers who prioritize health.

3. No Response (1 business): One business did not provide an answer regarding the impact of FOPL on sales. This business may be unsure or undecided about how the labelling system would affect their sales, potentially due to a lack of clear market data or experience with similar labelling systems. It's also possible that the business has not yet fully considered the potential sales effects or may not have enough information to make an informed judgment.

The data collected suggests that there is a split among businesses regarding the potential impact of FOPL on sales. Half of the businesses (4 out of 8) do not anticipate any change in sales due to the introduction of FOPL, likely because they believe that other factors, such as price, brand loyalty, or consumer habits, will remain more influential in purchasing decisions. However, the other half (4 out of 8) see the potential for an increase in sales, believing that clearer health information can attract health-conscious consumers, differentiate their products, and increase trust. The one business that did not provide an answer indicates that some businesses remain uncertain about the effect of FOPL on their sales, possibly due to a lack of experience or understanding of how consumers will respond to the new labels.

Figure Z: The Impact on Sales



SECTION 12: RECOMMENDATIONS

The findings of this study present a strong rationale for the progressive introduction of a robust, well-regulated, and equity-driven Front-of-Pack Labelling (FOPL) system in Fiji. The following recommendations are offered to guide government policymakers, health advocates, regulators, the food industry, and development partners:

1. DEVELOP A NATIONAL FOPL POLICY FRAMEWORK ROOTED IN HEALTH EQUITY AND INTERNATIONAL STANDARDS

- A National FOPL policy should be co-developed under the leadership of the Ministry of Health and Medical Services, in partnership with the Ministry of Trade, Consumer Council of Fiji, Universities, and industry stakeholders.
- The framework should draw upon the Codex Alimentarius Guidelines on Nutrition Labelling (CAC/GL 2-1985) and WHO's 2023 Guiding Principles on FOPL, with attention to Pacific-specific dietary risks and health inequities.
- Health equity must be a central principle—prioritising clear, interpretive, and colour-coded formats that are understandable to lower-literacy and multilingual populations (WHO, 2023; Hawley et al., 2013).

2. PILOT A VOLUNTARY FOPL SCHEME AND CONDUCT REAL-WORLD TESTING

- Launch a National FOPL pilot using a small cohort of representative businesses across product categories (beverages, processed snacks, frozen meals, etc.).
- Recommended models for testing include:
  - -Traffic Light System (UK model): Effective for colour-coded nutrient warnings.
  - -Health Star Rating (Australia/New Zealand): Good for overall health assessment.
  - -Warning Labels (Chile): Most effective at discouraging consumption of unhealthy products.
- Pilot results should assess consumer comprehension, behavioural influence, cost of implementation, and business feedback, supported by behavioural scientists and regulatory economists.

3. TRANSITION TO MANDATORY FOPL IN PHASE BASED ON RISK CATEGORY AND MARKET READINESS

- Develop a staged implementation plan to make FOPL mandatory, beginning with high-risk food groups most associated with NCDs—e.g., sugary drinks, high-sodium snacks, and ultra-processed foods (Monteiro et al., 2019).
- Provide a 1-2 year voluntary compliance window, followed by legally binding adoption through revised Food Safety Regulations.
- Ensure legislative coherence with Fiji's National NCD Strategic Plan 2022–2030 and the Fiji Nutrition Strategic Plan.

4. STRENGTHEN REGULATORY AND INSTITUTIONAL CAPACITY FOR ENFORCEMENT AND OVERSIGHT

- Establish an Interagency Monitoring Taskforce under the Ministry of Health, supported by FCCC, the Consumer Council, and municipal health authorities.
- Equip this taskforce with tools for regular inspections, nutritional content audits, and market surveillance of both local and imported products.
- Introduce a compliance grading system (e.g., gold, silver, non-compliant) to incentivise businesses and enhance public accountability.

5. PROVIDE TECHNICAL AND FINANCIAL SUPPORT TO FOOD BUSINESSES, ESPECIALLY MSMEs

- Develop a national FOPL Support Package including:
  -Technical assistance (e.g., labelling design, nutritional analysis)
  -Regulatory guidance and templates
  -Access to graphic design toolkits for compliant packaging

- Offer fiscal incentives such as tax credits, label redesign subsidies, or compliance-linked marketing grants—particularly for small and medium food enterprises that serve low-income consumers.

6. LAUNCH A NATIONWIDE FOPL LITERACY

- Public education must be central to FOPL success. This campaign should:
  -Use radio, TV, social media, and school curricula to teach FOPL formats and encourage healthier choices.
  -Be delivered in English, Fijian, and Hindi, with a focus on rural, youth, and lower-literacy populations.
  -Leverage community leaders, faith-based organisations, and health workers as trusted FOPL champions.
- Integrate FOPL education into Fiji's National Digital Financial Literacy Curriculum and Healthy Islands programme.

7. ALIGN FOPL WITH IMPORT REGULATION AND REGIONAL TRADE POLICY

- Require all imported pre-packaged foods sold in Fiji to comply with FOPL guidelines or provide equivalent labelling aligned with Codex standards.
- Update Fiji's import clearance procedures and trade agreements to ensure mutual recognition of labelling systems, especially with trading partners in Australia, New Zealand, and Asia-Pacific.

8. EMBED ONGOING RESEARCH, MONITORING, AND CONSUMER FEEDBACK MECHANISMS

- Establish a National Nutrition Labelling Observatory hosted by FNU or USP to:
  -Track FOPL impact on purchasing patterns, diet quality, and NCD rates.
  -Conduct biennial surveys on consumer understanding and trust in FOPL.
  -Monitor industry reformulation responses (e.g., sodium or sugar reduction).
- This evidence base should inform regular updates to labelling criteria and enforcement protocols.

9. ENSURE LEGAL BACKING THROUGH AMENDMENTS TO THE FOOD SAFETY ACT AND REGULATIONS

- Collaborate with the Fiji Law Reform Commission to amend:
  -Food Safety Act 2003 and Food Safety Regulations 2009 to incorporate mandatory FOPL as a statutory requirement.
  -Include enforcement provisions and penalties for non-compliance, including misleading or absent front-of-pack information.
- Ensure that any legal reforms are harmonised with international trade law, WTO TBT Agreement, and public health exceptions.

10. USE FOPL AS A CATALYST FOR BROADER FOOD SYSTEM TRANSFORMATION

- Position FOPL within Fiji's wider agenda on food systems transformation, digital health, and climate-resilient development.
- Promote FOPL alongside:
  - -Sugar-sweetened beverage taxes
  - -School meal reform
  - -National food procurement standards
  - -Healthy vendor licensing for municipal markets

CONCLUSION

The rising prevalence of non-communicable diseases (NCDs) in Fiji calls for immediate, innovative interventions that empower consumers to make healthier dietary choices. The Label Logic Fiji (LLF) – Front-of-Pack Labelling Initiative serves as a timely and strategic step toward that goal. Evidence from regional and international jurisdictions has demonstrated that clear, visible, and easy-to-understand nutrition labels have a strong impact on guiding consumer behaviour, improving diet quality, and ultimately reducing the burden of NCDs.

This paper has identified gaps in current labelling regulations and assessed consumer understanding and attitudes through surveys and regional comparisons. It has also outlined viable FOPL models, particularly colour-coded systems and warning labels, and recommended a phased, participatory approach to implementation in Fiji.

If successful, this initiative could pave the way for broader reforms in food policy and public health education, making Fiji a regional leader in consumer-centred food labelling. However, sustained political will, strong institutional frameworks, private sector buy-in, and community mobilisation will be key to achieving lasting impact.

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