



# Front-of-Pack Nutrition Labelling to Prevent Childhood Obesity in Argentina and Mexico

A Case Study

**Front-of-Pack Nutrition Labelling to Prevent Childhood Obesity in Argentina and Mexico. A Case Study.**

© United Nations Children’s Fund, New York, 2024

United Nations Children’s Fund  
Three United Nations Plaza  
New York, New York 10017

December 2024

Photo: © UNICEF/UNI725584/Herrerías

# Table of Contents

<b>Abbreviations</b> .....	<b>5</b>
<b>Executive Summary</b> .....	<b>6</b>
Key Findings .....	7
Key Learnings .....	7
Key Recommendations .....	8
<b>Introduction</b> .....	<b>9</b>
Background .....	9
UNICEF Argentina’s work on the front-of-pack nutrition labelling .....	13
UNICEF Mexico’s work on the front-of-pack nutrition labelling .....	16
<b>Approach and Methodology</b> .....	<b>19</b>
Purpose .....	19
Scope .....	19
Design .....	19
Data collection .....	19
Ethical considerations .....	20
<b>Findings: Cross-Country Analysis</b> .....	<b>21</b>
Factors enabling the progress of UNICEF’s work on front-of-pack nutrition labelling .....	21
<b>Learnings and Recommendations</b> .....	<b>33</b>
Learnings .....	33
Recommendations .....	35
<b>Annex 1: List of Key Informants Interviewed</b> .....	<b>38</b>
<b>Annex 2: Key Informant Interview Protocols (Including Informed Consent)</b> .....	<b>39</b>

## Table of Figures

<b>Figure 1.</b> Number of UNICEF COs working on ‘Nutrition labels with some form of interpretive front of pack, warning symbol or nutrition rating system to identify foods high in saturated-fats, trans-fatty acids, free sugars and/or salt’ across all UNICEF regions (2021) .....	12
<b>Figure 2.</b> Number of UNICEF COs working on Nutrition labels with some form of interpretive front of pack, warning symbol or nutrition rating system to identify foods high in saturated-fats, trans-fatty acids, free sugars and/or salt’ globally (2018 to 2021) .....	12

# QUE NO NOS TAPEN LOS OJOS

Es nuestro derecho saber qué contiene lo que comemos.



CONTIENE CAFÉINA  
EVITAR EN NIÑOS

CONTIENE EDULCORANTES,  
NO RECOMENDABLE EN NIÑOS



## Abbreviations

<b>BMI</b>	Body Mass Index
<b>CO</b>	Country Office
<b>CPD</b>	Country Programme Document
<b>CSO</b>	Civil Society Organization
<b>EAP</b>	East Asia and the Pacific
<b>ECA</b>	Europe and Central Asia
<b>ENNyS2</b>	National Health and Nutrition Survey II
<b>EO</b>	Evaluation Office
<b>EPRI</b>	Economic Policy Research Institute
<b>ESA</b>	Eastern and Southern Africa
<b>FAGRAN</b>	Argentine Federation of Nutrition Graduates
<b>FAO</b>	Food and Agriculture Organization
<b>FBDG</b>	Food-based Dietary Guideline
<b>FIC</b>	Interamerican Heart Foundation
<b>FOPL</b>	Front-of-Package Labelling
<b>FOPNL</b>	Front-of-Pack Nutrition Labelling
<b>FUNDEPS</b>	Fundación para el desarrollo de políticas sustentables
<b>GAPA</b>	Guías Alimentarias para la Población Argentina
<b>GDA</b>	Guideline Daily Amount
<b>GHAI</b>	Global Health Advocacy Incubator
<b>HQ</b>	Headquarters
<b>INSP</b>	Instituto Nacional de Salud Pública or National Institute of Public Health
<b>JME</b>	Joint Monitoring Estimates
<b>LAC</b>	Latin America and the Caribbean
<b>LACRO</b>	Latin America and the Caribbean Regional Office
<b>MENA</b>	Middle East and North Africa
<b>MUNA</b>	Municipio Unido por la Niñez y la Adolescencia (Municipality united by children and adolescents) initiative
<b>NCD</b>	Non-Communicable Disease
<b>PAHO</b>	Pan American Health Organization
<b>RAM</b>	Results Assessment Modules
<b>SA</b>	South Asia
<b>SDG</b>	Sustainable Development Goal
<b>SMQ</b>	Strategic Monitoring Question
<b>UN</b>	United Nations
<b>WHO</b>	World Health Organization



Residents sell snacks with preservatives outside their homes in a slum area of North Jakarta, Indonesia.  
© UNICEF/UN0459355/Wilander

© UNICEF/UN0459355/Wilander

## Executive Summary

The Latin America and the Caribbean (LAC) region is predominantly comprised of high-income and upper-middle-income countries and is characterized by marginally declining stunting rates but higher than average prevalence of overweight among children under five. Close to one-third of children aged 5-19 years in the region are overweight and risk early onset of non-communicable diseases (NCDs) like diabetes. A recently published UNICEF report – *‘Childhood overweight on the rise: Is it too late to turn the tide in Latin America and the Caribbean?’* reflects the concerning situation which has been emerging for decades. However, a notable silver lining is UNICEF’s strong history of programmatic and policy actions on childhood obesity prevention in the region since 2015, specifically in Mexico and Argentina, two of the four most affected countries in LAC, where UNICEF has been pioneering work in this area. Both country offices (COs) have initiated, and in some cases completed, work on three of the four priority policy actions identified by UNICEF Headquarters (HQ) in the area of overweight and obesity prevention among children and adolescents – Front-of-Pack Nutrition Labelling (FOPNL); restrictions on marketing of unhealthy foods and beverages to children; and improving school food environments. Of these, results on front-of-pack nutrition labelling have been especially noteworthy.

The potential of highlighting the two countries’ experiences to spur and guide policy action to support regulations on mandatory FOPNL by UNICEF offices globally was recognized. Both COs have utilized similar approaches to navigate different regulatory contexts to achieve the adoption of mandatory, interpretive labels on the front of packaged foods and beverages. While UNICEF Argentina successfully advocated for a new regulation on FOPNL, UNICEF Mexico supported the modification of an existing FOPNL norm to make it more evidence-based and easy to understand. However, both COs played a crucial role in curbing industry interference and resistance in the policy process, with Mexico continuing its efforts.

This case study on ‘Front-of-Pack Nutrition Labelling’, developed by the Economic Policy Research Institute (EPRI), presents key findings, learnings, and recommendations from UNICEF Argentina and UNICEF Mexico. The team employed a mixed method approach to collect primary qualitative and quantitative data from UNICEF staff and other stakeholders in both countries by conducting key informant interviews and an online survey. This case study takes a summative and formative approach to identify key achievements and challenges in implementing the work in two sample countries and highlights

key learnings to inform evidence-based scale-up of UNICEF's future impact and leadership on policy actions for front-of-pack nutrition labelling across all regions. The main intended audience for this case study is UNICEF staff who can utilize lessons from the work of UNICEF Argentina and Mexico and inform their policy action to support nutrition labelling regulations.

The key findings, learnings and recommendations are stated below.

## Key Findings

1. Both COs mobilized and utilized evidence to inform advocacy efforts at the executive and legislative levels and influence policy design. Given its global presence, UNICEF played a significant role in facilitating international knowledge sharing from countries with successful FOPNL legislations. This contributed towards the adoption of evidence based, comprehensive FOPNL systems in both countries.
2. The prioritization of overweight and obesity reduction by the government in both countries (in part due to UNICEF's advocacy in Argentina) enabled UNICEF to support FOPNL policy and continues to facilitate work in this policy area during the implementation phase.
3. Coordinated advocacy efforts with development partners and civil society significantly increased the effectiveness, efficiency, and political weight of UNICEF's actions to support FOPNL during the approval process.
4. UNICEF senior management support was critical throughout the policy discussion and approval stages. Next steps in both countries will focus on FOPNL implementation, requiring greater resource investment.
5. Interference from the food and beverage industry during the policy discussion process caused delays in the approval of FOPNL in both countries. UNICEF Argentina and UNICEF Mexico have terminated associations with food and beverage companies to avoid conflict of interest that may undermine the organization's advocacy position.
6. Decentralized regulatory frameworks and unequal implementing capacities across provinces in Argentina, and insufficient policy harmonization in Mexico pose challenges to FOPNL implementation.

## Key Learnings

1. Partnering with national research institutions to produce and mobilize evidence was a key enabler during the policy approval process by strengthening the credibility of evidence produced by UNICEF.
2. Building the capacity of UNICEF staff on common industry interference tactics and potential counter-responses by government and international organizations can help COs support approval processes for food environment policies like FOPNL.
3. Undertaking engagement at both executive and legislative levels of government is critical for UNICEF to support the achievement of meaningful food environment policy changes.
4. Clear policy implementation guidelines are vital to facilitate timely and consistent implementation of FOPNL standards at national and subnational I.
5. Public awareness and demand raising campaigns on FOPNL should complement policy approval and implementation to influence consumer behaviour change on consuming unhealthy foods and beverages.
6. Senior leadership in country offices must lend strategic support to staff on food environment policy actions by taking firm decisions to remove any existing or potential conflict of interest to strengthen the organization's credibility.
7. Prioritizing work towards establishing a clear FOPNL policy can lay the groundwork for effective conceptualization and implementation of related food environment regulatory policies (increasing taxes on sugar-sweetened beverages, restricting marketing of unhealthy foods and beverages directed to children, improving school food environments).

## Key Recommendations for UNICEF Country Offices

- 1.** Maintain national dialogue and policy research support with government officials on the relevance of FOPNL as an overweight and obesity prevention and healthy diet promotion measure.
- 2.** Increase the allocation of funding and human resources to scale FOPNL work across provinces in Argentina and broaden partnerships with civil society organizations (CSOs) with potential subnational reach in Mexico to campaign for robust nationwide implementation and monitoring.
- 3.** Maintain senior leadership's support for continued non-negotiable conflict of interest in both countries.
- 4.** Strengthen support for policy harmonization of FOPNL with other laws and frameworks and monitor law enforcement and subsequent product reformulations in Argentina and Mexico.



In Almaty, Kazakhstan, a boy is selecting sushki (crunchy bread snacks) with lemon flavor while grocery shopping with his mom.  
© UNICEF/UNI209837/Karimova

## Introduction

### Background

#### Global context

Globally, close to six per cent (37 million) children under five<sup>1</sup> and 18 per cent (300 million) children and adolescents aged 5-19 years, have overweight.<sup>2</sup> The overweight prevalence is worse in the LAC region (8.6 per cent), second only to the Middle East and North Africa region. Globally<sup>3</sup> 24 countries report rates that exceed the global average of 5.6 per cent for children under five. This disparity is intensified among school-age children and adolescents (aged 5-19 years), with more than 31 per cent having overweight, almost double the global average.<sup>4</sup> Notably, overweight prevalence trends in the region have

been worsening since 2000 (6.8 per cent in 2000, 7.4 per cent in 2012 and 8.6 per cent in 2022), coinciding with the proliferation of supermarkets and fast food chains and expanding food-processing industries and imports. Between 2000 and 2013, the consumption of ultra-processed and fast foods in LAC grew by 25 per cent and 40 per cent, respectively.<sup>5</sup> Latest estimates put the increase in sales of ultra-processed foods and beverages between 2014 and 2019 at 9.2 per cent<sup>6</sup> – a dramatic increase that is mirrored in most regions worldwide, particularly in South and South-East Asia.<sup>7</sup>

The current food retail environment, physical and online, comprises a wide array of ultra-processed foods and beverages that typically surpass the offering of unpackaged, mostly healthier foods in shelf

- 1 UNICEF, WHO and World Bank. (2023). *Levels and Trends in Child Malnutrition*. Retrieved from <https://data.unicef.org/resources/jme-report-2023/>.
- 2 UNICEF. (2023). *State of the World's Children Report*. Retrieved from <https://www.unicef.org/india/reports/state-world-s-children-2023>.
- 3 UNICEF, WHO and World Bank. (2023). *Levels and Trends in Child Malnutrition*. Retrieved from <https://data.unicef.org/resources/jme-report-2023/>.
- 4 UNICEF. (2019). *State of the World's Children Report*. Retrieved from [https://www.unicef.org/media/106506/file/The State of the World%E2%80%99s Children 2019.pdf](https://www.unicef.org/media/106506/file/The%20State%20of%20the%20World%E2%80%99s%20Children%202019.pdf).
- 5 *UN links rise in ultra-processed foods in Latin America and Caribbean to worsening health*. (2019, November 14). nutritioninsight.com/. Retrieved from <https://www.nutritioninsight.com/news/un-spotlights-rise-in-ultra-processed-foods-in-latin-america-and-caribbean-to-worsening-health.html#:~:text=Sales%20of%20ultra-processed%20food%20products%20are%20the%20fastest,and%20fast%20food%20consumption%20grew%20almost%2040%20percent>.
- 6 PAHO. (2019). *Ultra-processed foods gain ground among Latin American and Caribbean Families*. Retrieved from <https://www.paho.org/en/news/23-10-2019-ultra-processed-foods-gain-ground-among-latin-american-and-caribbean-families>.
- 7 Vandevijvere, S., Jaacks, L. M., Monteiro, C. A., Moubarac, J., Girling Butcher, M., Lee, A., Pan, A., Bentham, J., & Swinburn, B. (2019). *Global trends in ultraprocessed food and drink product sales and their association with adult body mass index trajectories*. *Obesity Reviews*. 2019; 20(S2): 10–19. doi: 10.1111/obr.12860.

spaces.<sup>8</sup> Evidence shows that unhealthy product options are very often subject to promotions, are packaged in ways that appeal to children (using cartoons, and bright colours) and carry misleading claims about their healthfulness.<sup>9</sup> With evidence showing customers spending less than ten seconds to select each item,<sup>10</sup> food labels are the primary means of communication between the producer and consumers and are used as a marketing tactic by companies to influence purchasing decisions.<sup>11</sup> Additionally, companies often provide nutritional information on the back of packages and in confusing and complex formats. The guideline daily amounts (GDAs) developed by a food industry consortium is one such prevalent system.

Front-of-Pack Nutrition Labelling has emerged as a significant and cost-effective regulatory tool to address childhood obesity. FOPNL consists of labels present on various food products to inform consumers about their health, healthiness, and nutrition aspects. Scientific evidence underscores the effectiveness of clear warning labels in dissuading consumers from choosing unhealthy options, making it a crucial intervention in the battle against childhood obesity.<sup>12</sup> Predictive models indicate that FOPNL policies could decrease the occurrence and spread of various NCDs, potentially up to five per cent, contingent on the specific design of the FOPNL.<sup>13</sup> UNICEF follows the World Health Organization's (WHO) guiding principles and framework manual on developing, implementing and evaluating FOPNL policies.

The LAC region, experiencing high rates of overweight among adults and children, is at the forefront of adopting FOPNL-related rules, regulations, and policies. WHO reported that all 35 countries in the region had undertaken policy discussions on FOPNL, 30 had introduced it formally and seven implemented it (including Mexico and Argentina).<sup>14</sup> The Pan American Health Organization (PAHO)<sup>15</sup>, Food and Agriculture Organization (FAO), and UNICEF are leading United Nations (UN) agencies working towards FOPNL uptake in the LAC region.

### **UNICEF's approach towards front-of-pack nutrition labelling**

In response to the escalating challenge of the triple burden of malnutrition (undernutrition, micronutrient deficiencies and overnutrition), UNICEF has prioritized the prevention of overweight in children and adolescents within its Nutrition Strategy 2020–2030. Central to this approach is UNICEF's guidance on the Prevention of Overweight and Obesity in Childhood and Adolescence,<sup>16</sup> published in 2020, which builds the background for close collaboration with governments and partners to tackle childhood obesity. UNICEF HQ recognizes 'inadequate labelling of industrially prepared foods that prevent caregivers, children and adolescents from understanding whether such foods contribute to a healthy diet or not' as one of the key drivers of obesogenic environments globally. As a response, UNICEF recommends a collaborative effort with relevant actors to

8 WHO. (2022). *Nutrition Labelling: Policy Brief*. Retrieved from <https://iris.who.int/bitstream/handle/10665/355295/9789240051324-eng.pdf?sequence=1>.

9 UNICEF. (2021). *Policy Brief: Front-of-pack Nutrition Labelling of Foods and Beverages*. Retrieved from [https://www.unicef.org/mongolia/media/5551/file/FoPNL\\_policy\\_brief.pdf](https://www.unicef.org/mongolia/media/5551/file/FoPNL_policy_brief.pdf).

10 UNICEF. (2021). *Policy Brief: Front-of-pack Nutrition Labelling of Foods and Beverages*. Retrieved from [https://www.unicef.org/mongolia/media/5551/file/FoPNL\\_policy\\_brief.pdf](https://www.unicef.org/mongolia/media/5551/file/FoPNL_policy_brief.pdf).

11 WHO. (2022). *Nutrition Labelling: Policy Brief*. Retrieved from <https://iris.who.int/bitstream/handle/10665/355295/9789240051324-eng.pdf?sequence=1>.

12 UNICEF and Instituto Nacional de Salud Pública. (2021). *Experiences in the design and implementation of front-of-pack nutrition warning labels in Latin America and the Caribbean*. Retrieved from: <https://www.unicef.org/lac/en/reports/front-pack-nutrition-warning-labels-in-latin-america-and-caribbean>.

13 UNICEF. (2021). *Policy Brief: Front-of-pack Nutrition Labelling of Foods and Beverages*. Retrieved from [https://www.unicef.org/mongolia/media/5551/file/FoPNL\\_policy\\_brief.pdf](https://www.unicef.org/mongolia/media/5551/file/FoPNL_policy_brief.pdf).

14 PAHO. (2022). *A Policy Study on front-of-pack nutrition labeling in the Americas: Emerging developments and outcomes*. Retrieved from <https://www.paho.org/es/documentos/proyecto-ley-promocion-alimentacion-saludable-postura-conjunta-op-soms-unicef-fao>.

15 PAHO is the specialised health agency of the Inter-American System and also serves as Regional Office for the Americas of the World Health Organization (WHO).

16 UNICEF. (2020). *Programming Guidance: Overweight and Obesity Prevention Among Children and Adolescents*. Retrieved from <https://www.unicef.org/documents/prevention-overweight-and-obesity-children-and-adolescents#:~:text=UNICEF's%20Programme%20Guidance%20on%20the,actions%20to%20improving%20children's%20food>.

develop and execute regulatory actions, coupled with vigilant monitoring and enforcement measures. One of the main focuses of UNICEF's childhood overweight and obesity prevention strategy is "the adoption of front-of-pack nutrition labelling requirements that identify foods that are high in salt, sugar and fats".<sup>17</sup>

While various FOPNL systems exist globally (in 32 countries as of 2019<sup>18</sup>), the change relies on identifying and supporting the best design and implementation of models that match each country's needs. Hence, many UNICEF country offices are advocating with and providing evidence and technical support to governments to introduce and implement effective FOPNL policies. UNICEF HQ has also identified the role of country offices in supporting governments with managing and counteracting private sector push-back and influence in policy discussions on FOPNL.

## UNICEF's global work on the front-of-pack nutrition labelling

Since 2018, there has been an increase in the number of COs undertaking work on front-of-pack nutrition labelling. UNICEF country office strategic monitoring questions (SMQs)<sup>19</sup> reported an increase from 56 countries supporting policy actions or programmes for the prevention of overweight among children and adolescents in 2018 to 73 countries in 2021. In 2021, 18 COs worldwide reported working on 'Nutrition labels with some form of interpretive front of pack, warning symbol or nutrition rating system to identify foods high in saturated fats, trans-fatty acids, free sugars and/or salt'. The LAC region has been leading work in this policy action, representing half (nine) of the total UNICEF country offices working in this area in 2021, which is 26 per cent of COs in the region. Europe and Central Asia (ECA), Middle East and North Africa (MENA), Western and Central Africa and South Asia (SA) regions each reported only one country undertaking this work (see Figure 1). While the number of country offices engaged in this policy action until 201 was relatively low as per SMQ data, the rate of increase between 2018 and 2021 suggests that support is increasing (50 per cent) (see Figure 2). At the time of the analysis in 2023, 21 out of a sample of 48 surveyed countries reported working on FOPNL. Of the participating countries that reported working on overweight and obesity prevention (34), 61 per cent were working on this specific policy action. Of the 21 countries, 42 per cent were from LAC and 28 per cent from East Asia and the Pacific (EAP) regions. The increase may be owing to the formalization of FOPNL as one of the four priority action areas on overweight and obesity prevention by UNICEF HQ and the availability of more evidence on the efficacy of FOPNL policies in reducing overall consumption of unhealthy foods and beverages in Chile, Uruguay and France.



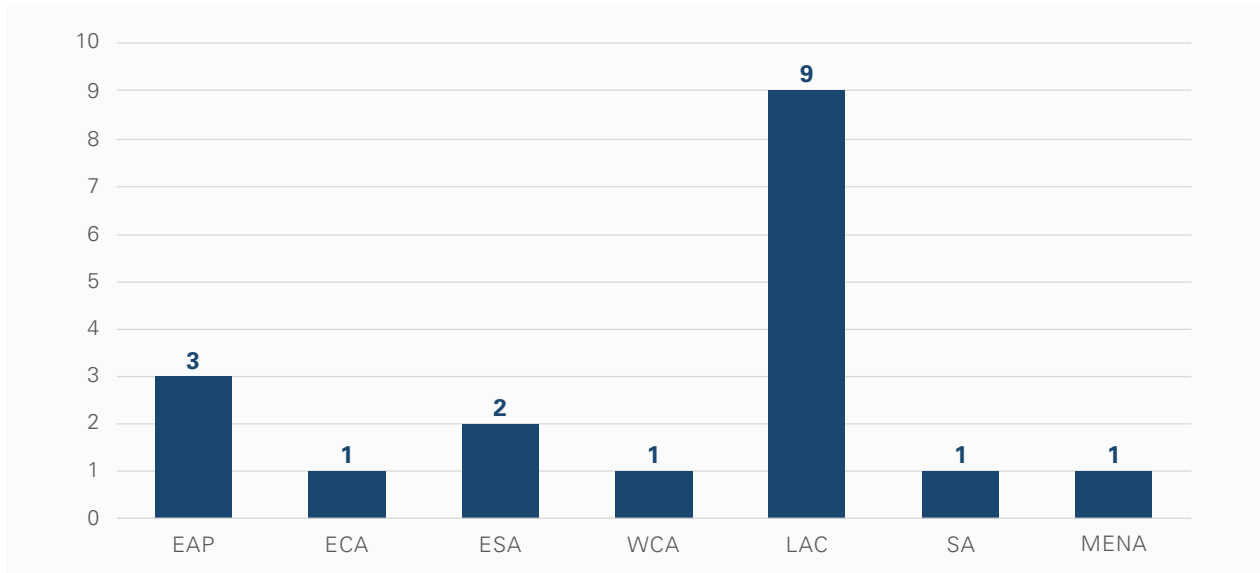
A drink vending machine sits outside of a storefront in a shopping centre in Jakarta, Indonesia. © UNICEF/UN0459359/Wilander

17 Ibid.

18 UNICEF. (2021). *UNICEF Technical Note: Effective regulatory approaches to protect, support and promote better diets and create healthy food environments for children*. Retrieved from [https://www.unicef.org/media/116671/file/UNICEF Technical Note.pdf](https://www.unicef.org/media/116671/file/UNICEF_Technical_Note.pdf).

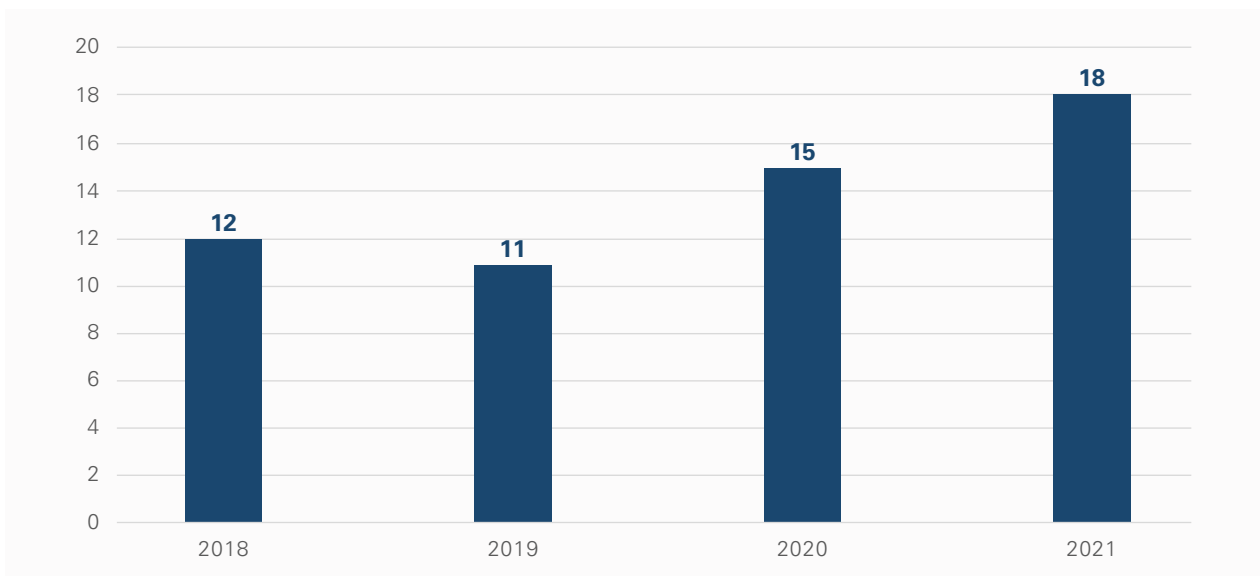
19 COs are required to answer strategic monitoring questions annually to help UNICEF track progress made against the indicators in UNICEF's global strategic plan.

**Figure 1.** Number of UNICEF COs working on ‘Nutrition labels with some form of interpretive front of pack, warning symbol or nutrition rating system to identify foods high in saturated-fats, trans-fatty acids, free sugars and/or salt’ across all UNICEF regions (2021)



UNICEF SMQ Data (2021)

**Figure 2.** Number of UNICEF COs working on nutrition labels with some form of interpretive front of pack, warning symbol or nutrition rating system to identify foods high in saturated-fats, trans-fatty acids, free sugars and/or salt’ globally (2018 to 2021)



UNICEF SMQ Data (2021)

UNICEF recognizes the importance of building the capacity of governments, CSOs, and other partners to effectively implement policies and strategies aimed at adopting mandatory, evidence-based and consumer-friendly front-of-pack nutrition labels. UNICEF has developed key documents that have been used as a reference by stakeholders working on FOPNL policies, such as UNICEF's technical guidance "*Front-of-Pack Nutrition Labelling: A 'How-to' Guide for Countries*",<sup>20</sup> technical note "*Effective regulatory approaches to protect, support and promote better diets and create healthy food environments for children*",<sup>21</sup> and policy brief "*Front-of-pack nutrition labelling of foods and beverages*".<sup>22</sup> UNICEF also organizes global webinars for knowledge sharing and capacity building of its staff and partner organizations to undertake food policy environment action, including food labels. For example, UNICEF HQ partnered with the Global Health Advocacy Incubator (GHA) on World Obesity Day 2022 to organize a four-part webinar series, spotlighting the successful work of UNICEF country offices and civil society actors, such as Bite Back 2030 and ShareAction on FOPNL policies, among others.

## UNICEF Argentina's work on the front-of-pack nutrition labelling

### Country context

Argentina stands out among countries, having the fourth highest overweight prevalence rate of 12.6 per cent. Additionally, the situation remains alarming among adolescents - in 2016 estimates put overweight among school-age children and adolescents (aged 10-19 years) at 37 per cent<sup>23</sup> and in 2019, a staggering 41 per cent of children aged 5-17 years were living with overweight and obesity.<sup>24</sup> Notably, adolescents in poorer and socially disadvantaged households in Argentina have a 58 per cent higher risk of obesity.<sup>25</sup>

The consistently high rates of overweight among children and adolescents since 2012 are attributed to changes in food and beverage consumption patterns. Argentina is the world's largest consumer of ultra-processed foods<sup>26</sup> and ranks only third after the United States and Mexico on volume sales of ultra-processed drinks per capita globally.<sup>27</sup> Argentina's National Health and Nutrition Survey II (ENNyS2), conducted in 2019 with UNICEF's technical support, revealed that 4 out of 10 children aged 6-17 years who purchased food and drink in schools bought sugary beverages and 6 out of 10 children and adolescents bought sweets in the school kiosk. The survey also showed that children (under 18 years of age) consumed 40 per cent more sugary drinks, three times more sweets and twice as many pastries and snacks as adults.<sup>28</sup>

20 UNICEF. (2021). *UNICEF Technical Guidance: Front of Pack Nutrition Labelling: A 'How-to' Guide for Countries*. Retrieved from <https://www.unicef.org/media/118716/file>.

21 UNICEF. (2021). *UNICEF Technical Note: Effective regulatory approaches to protect, support and promote better diets and create healthy food environments for children*. Retrieved from [https://www.unicef.org/media/116671/file/UNICEF Technical Note.pdf](https://www.unicef.org/media/116671/file/UNICEF%20Technical%20Note.pdf).

22 UNICEF. (2021). *Policy Brief: Front-of-pack Nutrition Labelling of Foods and Beverages*. Retrieved from [https://www.unicef.org/mongolia/media/5551/file/FoPNL\\_policy\\_brief.pdf](https://www.unicef.org/mongolia/media/5551/file/FoPNL_policy_brief.pdf).

23 UNICEF. (2023). *State of the World's Children Report*. Retrieved from <https://www.unicef.org/india/reports/state-world-s-children-2023>.

24 UNICEF Argentina. (2021). *Country Office Annual Report*. Retrieved from <https://www.unicef.org/media/115806/file/Argentina-2021-COAR.pdf>.

25 UNICEF and FIC Argentina. (2023). *Situación alimentaria de niños, niñas y adolescentes en Argentina. ¿Dónde estamos y a dónde vamos?*

26 Ibid.

27 Vandevijvere, S., Jaacks, L. M., Monteiro, C. A., Moubarac, J., Girling Butcher, M., Lee, A., Pan, A., Bentham, J., & Swinburn, B. (2019). *Global trends in ultraprocessed food and drink product sales and their association with adult body mass index trajectories*. *Obesity Reviews*. 2019; 20(S2): 10–19. doi: 10.1111/obr.12860.

28 2° Encuesta Nacional de Nutrición y Salud ENNyS 2. *Resumen ejecutivo*. – *Biblioteca Cesni*. (n.d.). Retrieved from <https://cesni-biblioteca.org/2-encuesta-nacional-de-nutricion-y-salud-ennys-2-resumen-ejecutivo/>.

A UNICEF review of labelling regulations and practices in four LAC countries in 2016 found that Argentina did not have mandatory standards or regulations on front-of-pack labelling, and 57 per cent of breakfast cereals and 33 per cent of milk and dairy products reviewed displayed a nutrition claim.<sup>29</sup> The 2019 National Health and Nutrition survey revealed that only one-third of the population read nutrition labels on food and beverage items, and only 15 per cent could interpret the nutrition information.<sup>30</sup>

UNICEF's engagement in tackling childhood overweight in Argentina emerged as a response to these alarming statistics. Additionally, observing proactive measures in neighbouring Latin American nations spurred Argentina's commitment, while local recognition of the problem prompted collaborative efforts between the government and civil society.

## Overview of work undertaken by UNICEF Argentina

In Argentina, UNICEF has made significant contributions to promoting FOPNL through its active support for the approval and implementation of the Law on Promotion of Healthy Eating No. 27.642, commonly known as the Front Labelling Law, 2021. UNICEF laid the grounds for FOPNL advocacy in 2018 by providing technical and strategic political support to the Ministry of Health to conduct the second National Nutrition and Health Survey. The survey design placed a strong focus on over-weight and included questions on the consumption of unhealthy foods among children and the use of labelling among consumers while making purchasing decisions. Utilizing the findings of this survey, UNICEF supported the National Directorate of Health Promotion and Control of Non-communicable Diseases in producing a report on childhood overweight and obesity. UNICEF Argentina also participated in an international conference organized by UNICEF Mexico in

2019 to facilitate knowledge sharing among experts, international organizations and former government officials from countries in the LAC region with a recent history of passing FOPNL laws. Utilizing one of the key learnings, UNICEF Argentina conducted a thorough desk review of existing documents from the Ministry of Health, official gazettes, press releases and information in social networks related to labelling to inform the advocacy and policy formulation process.

As a next step, UNICEF Argentina collaborated with the National Coalition to Prevent Children's Obesity to leverage and strengthen the voice of civil society to demand food environment policy reform, including the introduction of FOPNL legislation. In 2018, together with PAHO and the Chamber of Deputies, UNICEF organized a conference on consumer rights, FOPNL and health as part of the national congress.<sup>31</sup> Between 2019 and 2020, UNICEF co-convened and actively participated in working meetings with the Parliamentary Observatory Agenda 2030 of the Chamber of Deputies and the Human Rights Observatory of the Senate of the Nation. UNICEF promoted evidence-based policymaking during these meetings, including dedicating an entire session to discussing health warnings and the need to move beyond industry self-regulation. UNICEF, through inter-agency coordination with FAO and PAHO, provided direct technical input to the government's work on designing a comprehensive FOPNL policy. UNICEF's 2020 report on the exposure of children and adolescents to digital food marketing formed part of the evidence base to inform the inclusion of marketing restrictions provisions in the draft bill.

29 Instituto Nacional de Salud Pública de México and UNICEF. (2016). *Review of current labelling regulations and practices for food and beverage targeting children and adolescents in Latin America countries (Mexico, Chile, Costa Rica and Argentina) and recommendations for facilitating consumer information*. Retrieved from [https://www.unicef.org/lac/media/1876/file/PDF\\_An%C3%A1lisis de regulaciones y pr%C3%A1cticas para el etiquetado de alimentos y bebidas ING.pdf](https://www.unicef.org/lac/media/1876/file/PDF_An%C3%A1lisis%20de%20regulaciones%20y%20pr%C3%A1cticas%20para%20el%20etiquetado%20de%20alimentos%20y%20bebidas%20ING.pdf).

30 Secretaria Legal y Técnica and Boletín Oficial de la República Argentina. (2022). *Legislation and Official Notices: Promotion of Healthy Food*. Retrieved from [https://insightplus.bakermckenzie.com/bm/consumer-goods-retail\\_1/argentina-promotion-of-healthy-eating-decree-no-1512022](https://insightplus.bakermckenzie.com/bm/consumer-goods-retail_1/argentina-promotion-of-healthy-eating-decree-no-1512022).

31 UNICEF. (2018). *Call for Progress in Front-of-Pack Food Labelling to Promote Healthy Eating*. Retrieved from <https://www.unicef.org/argentina/comunicados-prensa/llaman-avanzar-en-el-etiquetado-frontal-de-alimentos-para-promover-la>.

UNICEF launched a social media campaign in 2020 to further mobilize political will for the legislation's passage. The campaign, titled 'Ojos Cerrados' (Eyes Closed)<sup>32</sup>, highlighted the link between unclear food labels and the country's childhood obesity epidemic. Owing in part to the efforts of UNICEF, UN agencies and CSOs, congress enacted the Law on Promotion of Healthy Eating ('Front of Package Labelling Law') in 2021. Notably, the law made provisions for restricting the marketing of products with warning labels to children and prohibited its sale in school settings. Since the law's passage, UNICEF has become a member of the working group organized by the Ministry of Health to develop the FOPNL implementation rules. The CO, together with FAO and PAHO, virtually engaged with experts from Chile, Peru, Uruguay, Mexico, and Colombia to build a strong understanding of potential implementation challenges and opportunities to inform its technical guidance to the government. Through its participation in an advisory board, UNICEF Argentina is supporting the Ministry of Health in updating the Argentinian Food-based Dietary Guidelines (FBDGs) to include

new topics related to the law. The Argentina CO won the UNICEF Inspire Award in 2022 for their strategic and technical support to the government on implementation planning.

Finally, UNICEF Argentina recently published a study on the results of FOPNL policies. UNICEF is now prioritizing working with municipalities in many provinces to advance subnational implementation of the Law on Promotion of Healthy Eating, including FOPNL, food and beverage marketing regulations, and healthy school environments. Detailed insights on UNICEF Argentina's work are presented in the subsequent section on cross-country findings (section 4)



A woman speaks with a health worker at a UNICEF-supported mobile clinic that provides health, nutrition, and psychosocial services to migrant children, adolescents, and pregnant women located in Chiapas, Mexico. © UNICEF/UN0778228/Kelly

32 U. A. (2020, October 28). #LeyDeEtiquetadoYa - ¿Compraría comestibles y bebidas sin verlos? YouTube. Retrieved from <https://www.youtube.com/watch?v=pDya87w-yi0>.

## UNICEF Mexico's work on the front-of-pack nutrition labelling

### Country context

Mexico stands out globally as a country grappling with a severe adult and childhood overweight and obesity crisis. Adult overweight exceeded 75 per cent as per the 2018 national health survey,<sup>33</sup> while prevalence among school-age children and adolescents aged 5-19 years stood at 35 per cent as per 2016 estimates.<sup>34</sup> In 2016, the Mexican government declared an epidemiological alert due to the escalating levels of obesity and diabetes, reaching some of the highest rates globally.<sup>35</sup> Despite the alert, the overweight rates among children of all age groups further worsened between 2018 and 2021— from 6.8 to 7.8 per cent among children under five, 35.5 to 37.4 per cent among children aged 5-11 years, and 38.4 to a concerning 42.9 per cent among adolescents aged 12-19 years.<sup>36</sup>

The increase in children's Body Mass Index (BMI) in the past 35 years in Mexico is among the steepest globally.<sup>37</sup> This trend has been attributed to economic liberalization in 1994, which led to the nationwide proliferation of ultra-processed foods and beverages at highly affordable prices. A 2022 study commissioned by UNICEF Mexico at 72

diverse points of sale found aggressive promotion of sugar sweetened beverages, with attractive price and packaging elements being commonly employed marketing strategies.<sup>38</sup> In addition to highly pervasive obesogenic food environments, social norms also view sugar-sweetened beverages as promoters of well-being and rewards for hard work, with parents providing such drinks to their children as a symbol of care.<sup>39</sup> Unsurprisingly, Mexico is the highest consumer of ultra-processed products in the LAC region<sup>40</sup> and the fourth highest consumer of sugary drinks globally.<sup>41</sup>

While the Government of Mexico, influenced by the food and beverage industry, implemented a FOPNL standard in 2014 in accordance with the GDA framework, many subsequent studies showed that this label format was confusing and difficult to decipher, even for students studying nutrition.<sup>42</sup> Hence, the GDA label, developed by the food and beverage industry, was widely regarded as inappropriate for influencing consumer behaviour, especially among vulnerable populations like people with low education levels. With the overweight situation more acute in low-income settings<sup>43</sup>, health experts and organizations, including UNICEF, deemed the label especially ineffective.

- 
- 33 UNICEF LACRO. (2022). *Case Study: Mexico City*. Retrieved from [https://www.unicef.org/lac/media/36911/file/Case study: Mexico.pdf](https://www.unicef.org/lac/media/36911/file/Case%20study%20Mexico.pdf).
- 34 UNICEF. (2023). *State of the World's Children Report*. Retrieved from <https://www.unicef.org/india/reports/state-world-s-children-2023>.
- 35 *What are we waiting for?* (n.d.). UNICEF. Retrieved from <https://www.unicef.org/stories/what-are-we-waiting-for-obesity-mexico>.
- 36 UNICEF LACRO. (2022). *Case Study: Mexico City*. Retrieved from [https://www.unicef.org/lac/media/36911/file/Case study: Mexico.pdf](https://www.unicef.org/lac/media/36911/file/Case%20study%20Mexico.pdf).
- 37 Eschenbacher, S., & Jasso, C. (2021, June 16). *Mexico's obesity epidemic*. Reuters. Retrieved from <https://www.reuters.com/world/americas/mexicos-obesity-epidemic-2021-06-16/>.
- 38 UNICEF LACRO. (2023). *Childhood overweight on the rise: Is it too late to turn the tide in Latin America and the Caribbean?* Retrieved from [https://www.unicef.org/lac/media/43076/file/Childhood overweight on the rise in LAC - 2023 Report.pdf](https://www.unicef.org/lac/media/43076/file/Childhood%20overweight%20on%20the%20rise%20in%20LAC%20-%202023%20Report.pdf).
- 39 Ibid.
- 40 PAHO. (2015). *Alimentos y bebidas ultraprocesados en América Latina: tendencias, efecto sobre la obesidad e implicaciones para las políticas públicas*. Retrieved from 9789275318645\_esp.pdf (paho.org)
- 41 Busby, M. (2022, November 4). Sugar rush: how Mexico's addiction to fizzy drinks fuelled its health crisis. The Guardian. Retrieved December 7, 2023, from <https://www.theguardian.com/global-development/2022/nov/04/sugar-rush-how-mexico-addiction-to-fizzy-drinks-fuelled-its-health-crisis-acc>.
- 42 Instituto Nacional de Salud Pública de México and UNICEF. (2016). *Review of current labelling regulations and practices for food and beverage targeting children and adolescents in Latin America countries (Mexico, Chile, Costa Rica and Argentina) and recommendations for facilitating consumer information*. Retrieved from [https://www.unicef.org/lac/media/1876/file/PDF An%C3%A1lisis de regulaciones y pr%C3%A1cticas para el etiquetado de alimentos y bebidas ING.pdf](https://www.unicef.org/lac/media/1876/file/PDF_An%C3%A1lisis%20de%20regulaciones%20y%20pr%C3%A1cticas%20para%20el%20etiquetado%20de%20alimentos%20y%20bebidas%20ING.pdf).
- 43 UNICEF LACRO. (2022). *Case Study: Mexico City*. Retrieved from [https://www.unicef.org/lac/media/36911/file/Case study: Mexico.pdf](https://www.unicef.org/lac/media/36911/file/Case%20study%20Mexico.pdf).

## Overview of work undertaken by UNICEF Mexico

UNICEF Mexico, recognizing the increasing overweight rates among children and the inefficacy of existing food environment policies, collaborated with FAO and PAHO in 2019 to advocate with the national government to introduce a new clear front-of-pack food label by modifying the existing 'Mexican Official Standard NOM-051-SCFI/SSA1-2010, General Labelling Specifications for Pre-packaged Foods and Non-alcoholic Beverages-Commercial and Sanitary Information (NOM-051)', among other policy reforms.<sup>44</sup> Notably, childhood overweight and obesity prevention was not a defined area of work for UNICEF Mexico in their then Country Programme Document (CPD) 2014-2019. Despite this, the country office remained agile and dedicated resources towards the FOPNL policy in response to the high level of interest from government and civil society. The CO subsequently formalized its support to the government in preventing, diagnosing, treating and monitoring childhood overweight and obesity in the CPD 2020-2025. UNICEF played a key role in

mobilizing evidence to highlight the gaps in the GDA framework used in the NOM 051 standard, including the lack of involvement of public health experts in its development. Under this initiative, UNICEF Argentina and the Mexican Instituto Nacional de Salud Pública or National Institute of Public Health (INSP) organized a workshop in 2019 to collate regional expertise and best practices related to the formulation and establishment of a comprehensive FOPNL system, especially with a view to countering private sector pushback. Academics, civil society, international organization representatives and most importantly, former government officials from countries with recently established FOPNL policies (Brazil, Chile, Ecuador, Peru and Uruguay) were invited to the meeting.

Using this evidence and international experience, UNICEF and PAHO supported policy dialogue at both legislative and executive levels, through letters to the House of Representatives and Senate to mobilize political will to pass the required amendment to the General Health Law. Subsequently, UNICEF and PAHO were invited to participate in a working group



A girl reads the labels of a snack in Juchitan, Mexico. © UNICEF/UN0778228/Kelly

44 *Organización de las Naciones Unidas para la Alimentación y la Agricultura: Etiquetado frontal de advertencia, un paso urgente para enfrentar epidemia de sobrepeso y obesidad en México | FAO en México | Food and Agriculture Organization of the United Nations.* (n.d.). Retrieved from <https://www.fao.org/mexico/noticias/detail-events/en/c/1235765/>.

convened by the Ministry of Health and Ministry of Economy to provide technical expertise on designing the norm modification. FAO supported UNICEF and PAHO in facilitating press conferences and letters to the House of Representatives. In 2020, owing to government will and leadership and technical support from international organizations and civil society, Mexico adopted the modification to the NOM-051 standard in March 2020 to introduce octagonal warning labels on industrially prepared foods and beverages to indicate excess calories, caffeine, sugar, saturated fat, trans fat and sodium. The government planned its enforcement in three phases, first in October 2020, then in October 2023 and lastly in October 2025. The new norm also included restrictions on the usage of children's characters, animations, cartoons, celebrities, athletes, pets, and interactive elements directed at children in the packaging of food and beverage products containing one or more warning octagons or the artificial sweeteners legend. Notably, the modification notice published in the Official Federal Gazette referenced two reports published by UNICEF while making the case for clearer labels and acknowledged the participation of UNICEF Argentina in its preparation.

Since its adoption, UNICEF Mexico has supported the enforcement of the norm by providing technical support to the Ministry of Health and Ministry of Economy in developing a guideline for health authorities and monitoring the impact of the new labelling on children's health in partnership with INSP. In 2022, UNICEF partnered with INSP and the Ministry of Health to launch a social media campaign to educate children about using the new labels and provided technical support to the government to revise the existing national marketing regulations in line with the new FOPNL norm.

Considering the strong opposition by the food and beverage sector against the provisions of the new norm, UNICEF has positioned itself as a child-rights advocate and is engaging in judicial processes to fight several unconstitutionality writs submitted by the companies in the National Supreme Court of Justice. Detailed insights on UNICEF Mexico's work are presented in the subsequent section on cross-country findings (section 4).



UNICEF Mexico create materials for the Overweight and Obesity Prevention.  
© UNICEF/UNI542197/Luna

## Approach and Methodology

### Purpose

The case study is summative and formative in nature. The summative component focuses on documenting and evaluating UNICEF’s inputs (activities, resources, partnerships) and results (outputs and outcomes) on front-of-pack nutrition labelling aimed to contribute towards the ultimate impact outlined in UNICEF’s overall strategic plans since 2018 and Sustainable Development Goal (SDG) 2.2.2: Reducing the percentage of children aged 0-19 years who have overweight. The formative components are forward-looking and aim to identify key opportunities and risks for scaling UNICEF’s future impact and leadership in nutrition labelling on industrially processed packaged foods and beverages.

### Scope

The case study included the actions and results of UNICEF during the period 2018-2023. Primary and secondary (qualitative and quantitative) data collection activities in this case study focused on two countries from Latin America and the Caribbean region: Argentina and Mexico.

### Design

This case study employed a comparative case study as the primary analytical approach. The case study undertook an in-depth examination of a single case – UNICEF’s work to promote regulations on front-of-pack nutrition labelling – in two countries. The case study approach produced generalizable knowledge about causal questions (e.g., how and why policy actions or programmes progress or fail in different contexts).

### Data collection

The team collected primary data for this case study through key informant interviews (list of key informants provided in **Annex 1**) and an online survey. The team triangulated findings from primary data collection with evidence from secondary resources such as annual reports, results assessment modules (RAM) reports, and UNICEF country-level publications. The data collection period spanned from June to October 2023.

## Ethical considerations

The data collection for this case study was limited to UNICEF staff, government officials and non-governmental organizations (NGOs). Data was not obtained from vulnerable cohorts including children, mothers, pregnant women, or others. The evaluation team completed the necessary documentation and provided the requested documents to acquire Research Ethics Approval from UNICEF HQ's Institutional Review Board. The key informant interview protocols used for country-level data collection and the approved 'Informed Consent' section of the online evaluation survey are included in **Annex 2**.



Family lunch in Juchitan Mexico.  
© UNICEF/UN0567886/Carrillo

## Findings: Cross-Country Analysis

This chapter presents the findings of the cross-country analysis assessing the contributions of UNICEF's work on front-of-pack nutrition labelling using six criteria – relevance, coherence, effectiveness, efficiency, sustainability, and positioning. While the team used a framework comprising questions, sub-questions and indicators guided by the six criteria to evaluate UNICEF's country-level work in Argentina and Mexico, the findings have been synthesised to provide an overall assessment of UNICEF's work on FOPNL, highlighting enabling factors, achievements, and gaps.

### Factors enabling the progress of UNICEF's work on front-of-pack nutrition labelling

**Finding 1: Both country offices mobilized and utilized evidence to inform advocacy efforts at the executive and legislative level and influence policy design. Given its global presence, UNICEF played a strong role in facilitating international knowledge sharing from countries with successful FOPNL legislation, contributing towards the adoption of evidence based, comprehensive FOPNL systems in Argentina and Mexico.**



UNICEF Argentina and UNICEF Mexico proactively mobilized evidence related to the need for and efficacy of FOPNL policies. Globally, FOPNL was considered a novel policy when both COs first initiated advocacy efforts, so UNICEF, independently and in partnership with other UN agencies and CSOs, published reports, position papers and media briefs to raise government and political awareness and support an evidence-based policy development process. Data on FOPNL served two purposes: advocating policy approval at legislative and executive levels and providing technical guidance to relevant ministers on its design and implementation. Noteworthy partnerships include collaborations with the Interamerican Heart Foundation (FIC) in Argentina and INSP in Mexico.

The UNICEF Latin America and the Caribbean Regional Office (LACRO) initiated the evidence-generation process on the need for FOPNL legislation in the region. LACRO commissioned INSP Mexico in 2016 to review labelling practices in Argentina, Chile, Costa Rica and Mexico.<sup>45</sup> The review found inadequate FOPNL standards in both Argentina and Mexico and recommended the introduction of evidence-based systems (especially highlighting how the previous GDA-based FOPNL norm in Mexico was difficult to understand and developed by the food and beverage industry without any consultation with the public health experts) followed by public education campaigns to ensure use among consumers. This report became one of the foundational pieces of evidence for COs to initiate engagement with governments. LACRO conducted a follow-up study in 2019 to understand the retail environment and in-store marketing techniques in Argentina, Brazil, and Mexico<sup>46</sup> as well as the recommendation that country governments adopt FOPNL policies, in line with the Chilean system of using easy-to-understand, interpretive warning labels on the front of the pack.

At the country level, UNICEF Argentina has been instrumental in supporting evidence generation.

- ▶ The country office played a crucial role in analysing the 2007 and 2012 Encuesta Mundial de Salud Escolar (Global School-based Student Health Survey) together with FIC in 2016<sup>47</sup> and supported the Ministry of Health to develop and implement the second National Survey for Nutrition and Health in 2018 (ENNYS II).<sup>48</sup> Based on the findings of these surveys, the National Coalition to Prevent Childhood Obesity published an advocacy note on FOPNL,<sup>49</sup> and UNICEF Argentina produced a report recommending a set of policies, including FOPNL, for preventing overweight and obesity in children in the country.<sup>50</sup> The report provided global evidence on the effectiveness of clear front-of-pack nutrition labels in improving consumers' ability to evaluate the healthiness of a product and willingness of companies to reformulate their unhealthy offerings to avoid warning labels.
- ▶ In 2019, UNICEF Argentina partnered with VOICES! Research and Consultancy group to consult international digital marketing and communications experts from the United Kingdom and Peru, among others and produce a report on the exposure of children and adolescents to digital marketing of unhealthy foods and beverages. The report highlighted the importance of warning labels in dissuading influencers and celebrities from endorsing unhealthy products. The study released in May 2021,<sup>51</sup> was a key input for the inclusion of marketing restrictions in the Law on Promotion of Healthy Eating in Argentina.

- 
- 45 Instituto Nacional de Salud Pública de México and UNICEF. (2016). *Review of current labelling regulations and practices for food and beverage targeting children and adolescents in Latin America countries (Mexico, Chile, Costa Rica and Argentina) and recommendations for facilitating consumer information*. Retrieved from [https://www.unicef.org/lac/media/1876/file/PDF\\_An%C3%A1lisis de regulaciones y pr%C3%A1cticas para el etiquetado de alimentos y bebidas ING.pdf](https://www.unicef.org/lac/media/1876/file/PDF_An%C3%A1lisis%20de%20regulaciones%20y%20pr%C3%A1cticas%20para%20el%20etiquetado%20de%20alimentos%20y%20bebidas%20ING.pdf).
- 46 UNICEF LACRO. (2019). *Childhood Overweight and the Retail Environment in Latin America and the Caribbean*. Retrieved from [https://cesni-biblioteca.org/archivos/UNICEF-Childhood Obesity and the Retail Environment LAC %281%29.pdf](https://cesni-biblioteca.org/archivos/UNICEF-Childhood%20Obesity%20and%20the%20Retail%20Environment%20LAC%20281%29.pdf).
- 47 UNICEF and FIC (2016). *Brechas sociales de la obesidad en la niñez y adolescencia*. Retrieved from: <https://www.unicef.org/argentina/informes/brechas-sociales-de-la-obesidad-en-la-ni%C3%B1ez-y-adolescencia>.
- 48 *2º Encuesta Nacional de Nutrición y Salud ENNYS 2. Resumen ejecutivo*. – Biblioteca Cesni. (n.d.). Retrieved from <https://cesni-biblioteca.org/2-encuesta-nacional-de-nutricion-y-salud-ennys-2-resumen-ejecutivo/>.
- 49 » *Posicionamiento de la Coalición Nacional para Prevenir la Obesidad Infantil sobre la última Encuesta Nacional de Nutrición y Salud*. (n.d.). Retrieved from <https://www.ficargentina.org/posicionamiento-de-la-coalicion-nacional-para-prevenir-la-obesidad-infantil-sobre-la-ultima-encuesta-nacional-de-nutricion-y-salud/>.
- 50 UNICEF. (2019). *Obesidad: una cuestión de derechos de niños, niñas y adolescentes*. Retrieved from [https://www.unicef.org/argentina/media/4996/file/Obesidad, una cuesti%C3%B3n de derechos.pdf](https://www.unicef.org/argentina/media/4996/file/Obesidad,%20una%20cuesti%C3%B3n%20de%20derechos.pdf).
- 51 *Children and adolescents' exposure to food and beverage digital marketing in Argentina*. (2021). UNICEF. Retrieved from [https://www.unicef.org/argentina/media/12156/file/Executive%20Summary%20\(english\).pdf](https://www.unicef.org/argentina/media/12156/file/Executive%20Summary%20(english).pdf).

- ▶ During the development of the Law on Promotion of Healthy Eating Law in 2020 and parliamentary discussions in 2021, UNICEF supported the National Coalition to Prevent Obesity in Children and Adolescents to produce two studies to ensure the proposed FOPNL law remained high on the political and public agenda to highlight the conflict of interest and interference of the food industry in the design of healthy eating policies in Argentina<sup>52</sup> and bust myths associated with FOPNL that were common in the public discourse.<sup>53</sup>
- ▶ In partnership with FAO and PAHO, UNICEF Argentina also supported the launch of a social media campaign to share international success stories on FOPNL and raise public demand for the law's approval.<sup>54</sup>

UNICEF Mexico's FOPNL policy advocacy and discussion process was shorter and required intensive, evidence-based advocacy and government engagement in 2019 and 2020. The CO primarily used published national and international studies to support the case for a norm change. UNICEF and PAHO released a technical note in 2019 highlighting the evidence of the ineffectiveness of the former GDA norms and the findings of the National Academic Expert Committee on Front Labelling of Foods and Non-Alcoholic Beverages for Better Health, comprising 30 researchers from various health institutions, to introduce a labelling system similar to that used in Chile and Peru.<sup>55</sup> UNICEF also published multiple media briefings during the discussion and approval stages, highlighting the best-in-class, evidence-based nature of the proposed norm change.<sup>56 57</sup>

In Argentina and Mexico, UNICEF used global and regional evidence to contribute to technically informing label policy design, contributing to enhancing the appropriateness of the policy. In both countries, UNICEF participated in the working group to develop the new FOPNL standards. Notably, UNICEF Argentina's digital marketing study and UNICEF Mexico's provision of unique evidence on the need for warning labels for children on products with presence of artificial sweeteners and caffeine led to the comprehensiveness of FOPNL standards in both countries. UNICEF Argentina also engaged with legislators at the Argentine National Congress to promote evidence-based policy-making, including FOPNL. For instance, UNICEF supported a conference organized by the Agenda 2030 Parliamentary Observatory and the General Directorate of Parliamentary Diplomacy on health warnings on packaging in 2019.<sup>58</sup> As a result, the approved FOPNL systems in both countries are considered one of the best globally. In collaboration with other UN agencies and CSOs, UNICEF contributed towards aligning the Argentine FOPNL system with WHO nutrient intake guidelines and Dietary Guidelines for the Argentine Population (Guías Alimentarias para la Población Argentina - GAPA) and including best global standards (warning labels, graphic and easily interpretable octagon systems). With support from UNICEF Mexico, consultations with experts from Peru, Chile and Uruguay helped inform the revised Mexican FOPNL standard. The revised standard included clear instructions for food and beverage companies to provide mandatory mini-octagonal warnings for small products generally consumed by children but

52 National Coalition to Prevent Obesity in Children and Adolescents. (2020). *Conflicto de interés e interferencia de la industria de alimentos en el diseño de políticas de alimentación saludable*. Retrieved from [https://www.prevenirobesidadinfantil.org/wp-content/uploads/2020/06/coalicion\\_docu\\_v4\\_WEB-1.pdf](https://www.prevenirobesidadinfantil.org/wp-content/uploads/2020/06/coalicion_docu_v4_WEB-1.pdf).

53 UNICEF. (2021). *La Ley de Promoción de la Alimentación Saludable no es "una ley para ricos": UNICEF derriba mitos sobre el etiquetado frontal de alimentos*. Retrieved from <https://www.unicef.org/argentina/comunicados-prensa/etiquetado-claro-derribamos-mitos>.

54 UNICEF. (2020). *#LeyDeEtiquetadoYa: impulsan una campaña para pedir la sanción de la ley de etiquetado frontal de productos alimentarios*. Retrieved from <https://www.unicef.org/argentina/comunicados-prensa/ley-etiquetado-frontal-alimentos>.

55 PAHO and UNICEF. (2019). *Technical Note: Clear and easy-to-understand nutrition labelling protects children and adolescents in Mexico*. Retrieved from <https://www.unicef.org/mexico/informes/un-etiquetado-nutritional-frontal-claro-y-de-f%C3%A1cil-comprens%C3%B3n>.

56 *El etiquetado nutricional de México que protege a la infancia*. (n.d.). UNICEF. Retrieved from <https://www.unicef.org/mexico/historias/el-etiquetado-nutritional-de-m%C3%A9xico-que-protege-la-infancia>.

57 *What are we waiting for?* (n.d.). UNICEF. Retrieved from <https://www.unicef.org/stories/what-are-we-waiting-for-obesity-mexico>.

58 *Jornada sobre Prevención de Obesidad: Advertencia Sanitarias y Legislación Basada en Evidencia*. (n.d.). Hsn, Senado,. Retrieved from <https://www.senado.gob.ar/prensa/17694/noticias>.

often excluded from labelling in other countries.<sup>59</sup> Based on its FOPNL advances, in September 2020, the Government of Mexico was recognized by United Nations Inter-Agency Task Force for its *outstanding contribution to the prevention and control of NCDs, mental health or sustainable development goals associated with NCDs*.<sup>60</sup>

In both cases, UNICEF led international knowledge sharing activities to disseminate relevant evidence and lessons learned about technical aspects of FOPNL policy design and best advocacy practices. Workshops and forums involving various stakeholders leveraged learning and enhanced capacity among development partners, CSOs and government decisionmakers to advocate during the policy approval process more effectively. In Mexico, in July 2019, UNICEF and INSP organized a regional workshop with stakeholders from various Latin American countries to foster the exchange of experiences supporting FOPNL policy processes. Participants included academics, members of CSOs, policy-makers, delegates from international organizations and key deputies involved in the policy discussion in Mexico.<sup>61</sup> Lessons shared included the novel mini warning octagons design and the main strategies used by the food industry to block the approval and implementation of FOPNL policies. UNICEF Argentina, PAHO, WHO, FAO, and the UN Resident Coordinator's Office hosted a virtual conference on FOPNL in September 2021 during which key stakeholders, including representatives from government and academia in countries with regulations (Chile, Mexico, Uruguay, Peru, and Colombia), shared their experiences. The discussions focused on challenges, obstacles, and valuable lessons learned in implementing these regulations.<sup>62</sup>

**Finding 2: Government prioritization of overweight and obesity reduction in both countries (in part due to UNICEF's advocacy in Argentina) enabled UNICEF support FOPNL policy and continues to facilitate work in this area during the implementation phase.**

Both country offices initiated support for FOPNL policy in the context of government prioritization of the overweight and obesity reduction agenda. In Argentina, UNICEF's support to the government in conducting the National Survey for Nutrition and Health in 2018 helped highlight the rising childhood overweight and obesity rates. This contributed towards solidifying government commitment to address it. When the policy discussions started, the COs identified the opportunity to join national efforts to advance FOPNL. UNICEF Argentina and Mexico formalized support for their respective governments on overweight and obesity prevention in the 2017 and 2020 cooperation cycles, respectively.<sup>63,64</sup> More specifically, in sharing an agenda with Ministries of Health, UNICEF had the opportunity to continue supporting the policy in its implementation stages in both countries and maintain coherence with government priorities.

UNICEF Argentina has emerged as a key reference point in healthcare discussions, engaging actively with policymakers at the National Health Commission and having frequent meetings with government officials, which was key in the FOPNL advocacy process. Complementarily, UNICEF collaborated with a team of experts to craft the inter-ministerial National Plan aimed at preventing child overweight and obesity - a comprehensive plan which was formally presented to the President

59 *El etiquetado nutricional de México que protege a la infancia*. (n.d.). UNICEF. Retrieved from <https://www.unicef.org/mexico/historias/el-etiquetado-nutricional-de-m%C3%A9xico-que-protege-la-infancia>.

60 *Front-of-package labelling advances in the Americas*. (n.d.). PAHO/WHO | Pan American Health Organization. Retrieved from <https://www.paho.org/en/news/29-9-2020-front-package-labeling-advances-americas>.

61 UNICEF and Instituto Nacional de Salud Pública. (2021). *Experiences in the design and implementation of front-of-pack nutrition warning labels in Latin America and the Caribbean*. Retrieved from: <https://www.unicef.org/lac/en/reports/front-pack-nutrition-warning-labels-in-latin-america-and-caribbean>

62 UNICEF. (2022). *Results Assessment Modules Report*. Retrieved from UNICEF InSight Portal.

63 UNICEF. (2016). *Country Programme Document: Argentina*. Retrieved from [https://sites.unicef.org/about/execboard/files/2016-PL4-Argentina\\_CPD-ODS-EN.pdf?\\_gl=1\\*wkvqoo\\*\\_ga\\*MTM1OTg2OTM2MC4xNjg1NjA2MzY5\\*\\_ga\\_ZEPV2PX-419\\*MTcwMTkyNzc4OS4yOC4xLjE3MDE5Mjg5NTcuMjluMC4w](https://sites.unicef.org/about/execboard/files/2016-PL4-Argentina_CPD-ODS-EN.pdf?_gl=1*wkvqoo*_ga*MTM1OTg2OTM2MC4xNjg1NjA2MzY5*_ga_ZEPV2PX-419*MTcwMTkyNzc4OS4yOC4xLjE3MDE5Mjg5NTcuMjluMC4w).

64 UNICEF. (2020). *Country Programme Document: Mexico*. Retrieved from [https://sites.unicef.org/about/execboard/files/2019-PL6-Mexico\\_CPD-EN-ODS.pdf?\\_gl=1\\*17nsjq8\\*\\_ga\\*MTM1OTg2OTM2MC4xNjg1NjA2MzY5\\*\\_ga\\_ZEPV2PX-419\\*MTcwMTkyNzc4OS4yOC4xLjE3MDE5Mjg5NzEuOC4wLjA](https://sites.unicef.org/about/execboard/files/2019-PL6-Mexico_CPD-EN-ODS.pdf?_gl=1*17nsjq8*_ga*MTM1OTg2OTM2MC4xNjg1NjA2MzY5*_ga_ZEPV2PX-419*MTcwMTkyNzc4OS4yOC4xLjE3MDE5Mjg5NzEuOC4wLjA).

in 2019 and received official approval later that same year.<sup>65</sup>

Furthermore, UNICEF Argentina actively promoted synergy between the Ministry of Health and the former Ministry of Education, particularly around school environments. Similarly, UNICEF collaborated closely with the Ministry of Development, bridging the gap between poverty and malnutrition. This collaborative effort contributed to building bridges for FOPNL implementation, for instance, facilitating actions for supervising the selling of food in schools or coordinating with local producers to implement the labelling. Given UNICEF's close working relationship with the government and its active role in advocacy and evidence generation during the approval phase, the Ministry of Health invited UNICEF to join the FOPNL working group to support its implementation planning and monitoring.

In the case of Mexico, a government transition in 2018 markedly increased the prioritization of overweight and obesity prevention, serving as a vital entry point for change in NOM-051 introducing FOPNL. In recognition of UNICEF's technical expertise, the Ministry of Economy and Ministry of Health extended UNICEF membership to the government-led working group on NOM-051 modification during 2019-2020. After three years of Front-of-Package Labelling (FOPL) implementation, UNICEF continues to provide technical support to the Ministry of Health to undertake legal action to counter appeals by the food and beverage industry and develop guidelines for health authorities to monitor the appropriate implementation of the norm change. Another example of government commitment to the FOPNL and other food environment policies is UNICEF Mexico's collaboration with the Ministry of Health on the public dissemination campaign of the front-of-pack labelling law. The social media campaign *Héroes por la salud*, aimed at influencing behaviour change among all consumers – especially parents and children – by promoting the active use of labels during shopping, has reached more than 18 million social media

users, including children and directly almost 30,000 children in schools. While UNICEF supported the campaign's design and financed some aspects, the national government has led the work, including disseminating among the 32 states, as well as the purchase of Facebook ads.

The adoption of FOPNL varied among countries after its formal introduction but was relatively faster in Argentina and Mexico than in other LAC countries. For instance, while FOPNL policies took approximately five years to be implemented in Chile, three years in Bolivia and Brazil, and two years in Colombia and Peru, the law was approved in only one and a half years in Argentina and six months in Mexico.<sup>66</sup> The relatively short time it took to discuss and approve the policy in both countries is likely associated with government commitment to and prioritization of the obesity prevention agendas, among other factors.



65 UNICEF Argentina. (2019). *Country Office Annual Report*. Retrieved from <https://www.unicef.org/media/90461/file/Argentina-2019-COAR.pdf>.

66 Crosbie E, Gomes FS, Olvera J, Rincón-Gallardo Patiño S, Hoepfer S, and Carriedo A. (2023). *A policy study on front-of-pack nutrition labelling in the Americas: emerging developments and outcomes*. The Lancet Regional Health - Americas, 18, 100400. doi:10.1016/j.lana.2022.100400.

**Finding 3: Coordinated advocacy efforts with development partners and civil society significantly increased the effectiveness, efficiency, and political weight of UNICEF's actions to support FOPNL during the approval process.**

Collaborating closely with development partners and civil society through coordinated advocacy efforts during the policy approval process was critical for increasing support among decisionmakers. The common agenda shared by PAHO, WHO, FAO, national organizations and UNICEF, together with a clear positioning in support of FOPNL policies enabled joint and coordinated advocacy strategies that garnered significant support among decisionmakers during approval processes in both countries.

In Argentina, UNICEF presented strong interagency coordination, collaborating with other international agencies, such as FAO and PAHO, which had been less common in previous years. Through joint efforts, policy briefs were produced, and letters sent to members of congress, among other strategies, all of which were aimed at disseminating evidence supporting the law and emphasizing its public health benefits. The synergy among these agencies, each contributing unique strengths and perspectives, was a key factor in their collective success. UNICEF Argentina, PAHO and FAO formalized a shared matrix of activities in 2021, enabling the design of mass media campaigns on FOPNL.

UNICEF Argentina, FAO, and PAHO were also partners in co-hosting technical workshops for knowledge sharing.<sup>67</sup> Complementarily, the combination of UNICEF's child and adolescent rights perspective with PAHO's health vision and FAO's food security and nutrition viewpoint represented an opportunity to establish a robust foundation of

support for regulations targeting obesogenic environments, including front-of-package food labelling.<sup>68</sup> This complementarity, integration, and alignment also existed in UNICEF Mexico's work, exemplified by the joint notice released by UNICEF, FAO, and PAHO on the need for an urgent front warning label in 2019.<sup>69</sup>

UNICEF's support for FOPNL aligns with civil society objectives. In both countries, continued dialogue, coordination, and advocacy with CSOs strengthened decisionmakers' support for FOPNL by underscoring the public support base for the policy. Moreover, CSOs had a key role in contributing substantially to disseminating important evidence and messages produced by UNICEF and its partners. One notable effort was the establishment of the National Coalition for the Prevention of Child and Adolescent Obesity (Coalición Nacional para Prevenir la Obesidad en Niños, Niñas y Adolescentes) by UNICEF in partnership with FIC in 2017.<sup>70</sup> Initially comprising 30 stakeholders and esteemed nutritionists, the coalition played a pivotal role in advocating for the chapters of the *Law on Promotion of Healthy Eating*, initially focusing on enhancing school environments. Over time, the coalition transitioned into a proactive force, generating vital evidence, advocating for front-of-package labelling, and facilitating capacity building initiatives for nutritionists at the local level so that they could advocate in support of the law. UNICEF's continued funding and active participation underscored the coalition's enduring relevance. UNICEF organized capacity building meetings for coalition members on communications and political advocacy and actively supported the addition of 20 more members by the end of 2021. Fundación para el desarrollo de políticas sustentables (FUNDEPS), a non-profit advocacy group, currently acts as the secretariat for the coalition. UNICEF Argentina

67 UNICEF Argentina. (2021). *Argentina Country Office Annual Report*. Retrieved from <https://www.unicef.org/media/115806/file/Argentina-2021-COAR.pdf>.

68 UNICEF Argentina. (2020). *Argentina Country Office Annual Report*. Retrieved from <https://www.unicef.org/media/100466/file/Argentina-2020-COAR.pdf>.

69 *Organización de las Naciones Unidas para la Alimentación y la Agricultura: Etiquetado frontal de advertencia, un paso urgente para enfrentar epidemia de sobrepeso y obesidad en México | FAO en México | Food and Agriculture Organization of the United Nations*. (n.d.). Retrieved from <https://www.fao.org/mexico/noticias/detail-events/en/c/1235765/>.

70 » *Pronunciamiento de la Coalición Nacional para Prevenir la Obesidad Infantil sobre etiquetado de alimentos*. (n.d.). Retrieved from <https://www.ficargentina.org/pronunciamiento-de-la-coalicion-nacional-para-prevenir-la-obesidad-infantil-sobre-etiquetado-de-alimentos/#:~:text=los%20est%C3%A1ndares%20recomendados.,La%20Coalici%C3%B3n%20Nacional%20para%20Prevenir%20la%20Obesidad%20en%20Ni%C3%B1os%2C%20Ni%C3%B1as,organizaciones%20de%20todo%20el%20pa%C3%ADs.>

actively participated in debates on FOPNL in forums, webinars, conferences, and congresses organized by CSOs such as the Argentine Federation of Nutrition Graduates (FAGRAN) and FUNDEPS.

In Mexico, the CO collaborated closely with the consumer rights organization, El Poder del Consumidor, and CSOs like Alianza por la Salud Alimentaria and Coalición ContraPESO to coordinate advocacy efforts, including joint public positioning, lessons sharing and dissemination of briefs on FOPNL norm modification. UNICEF's collaboration with El Poder del Consumidor, FAO and PAHO extended to advocacy on related legislation like the approval of a modification to the General Education Law for healthier school food environments and regulations promoting breastfeeding. However, UNICEF Mexico's collaboration with civil society on FOPNL is less varied due to the difficulty of finding partners that do not present a conflict of interest. Notably, all evidence generation exercises commissioned by UNICEF Mexico have been undertaken with the support of INSP, leaving some scope for new collaboration with other academic organizations. The CO will continue collaborating with external organizations in the implementation stages to support the harmonization of school norms regarding food environments with the new regulatory framework stipulated by the educational reform and national school guidelines.

UNICEF's messaging that focused on preventing child overweight and obesity was vital among broader advocacy for introducing FOPNL policies in both countries. Although support for FOPNL policies is generally framed from a public health perspective, other areas include children's rights, consumer rights, the right to information, and concerns for non-communicable diseases. Leading strategic efforts in overweight and obesity prevention in the region, PAHO, WHO, and certain CSOs focused on messages oriented to public health; FAO focused on food security, and some CSOs advocated for the right to information. Under its unique mandate to support the realization of children's rights, UNICEF mobilized strong messages on the relevance of FOPNL policies to prevent overweight and obesity among children. Consulted stakeholders agree that UNICEF's child-focused messaging strengthened the initiative's legitimacy considering the alarming prevalence of child obesity in both countries.

**Finding 4: Senior management support was critical throughout the policy discussion and approval stages. UNICEF's next steps in both countries will focus on FOPNL implementation, requiring greater resource investments.**

In both Argentina and Mexico, senior leadership in UNICEF played an important role in strengthening advocacy and positioning of country offices on FOPNL legislation. In Mexico, the social policy team, led by the section chief, initiated work on FOPNL in recognition of high government and civil society interest. Subsequently, the nutrition team took over and engaged management within the country office (representative and deputy representative) to publicly affirm UNICEF's position in favour of FOPNL and to participate in high-level policy discussions with the government. Both strongly supported the country office's decision to disengage with companies that either produce ultra-processed foods and beverages or have a history of interfering in public policymaking processes. This move helped UNICEF to establish credibility with the government and actively provide technical assistance to the government during the policy design and implementation stages. Before joining UNICEF Argentina in 2018, the representative acted as one of the coordinators and technical advisors for a 2016 LACRO-commissioned regional review of labelling practices. With a background in child survival and development, the representative strongly supported the CO's chief of nutrition to engage in discussion, approval, and implementation processes for the Law on Promotion of Healthy Eating.

UNICEF has had an active role in informing advocacy and policy design during the law's approval and elaboration. Now that it has succeeded in both goals, both COs have emphasized the importance of not only monitoring the implementation of FOPNL policies, but also supporting governments in developing capacities and willingness to do so. In Argentina and Mexico, implementation efforts are closely aligned with regulating school food environments and the restrictions on the marketing of foods and beverages with warning labels in schools.

Moreover, while the initial stages of ensuring approval of the FOPNL law relied heavily on intense policy advocacy which in turn required relatively modest financial commitments, supporting implementation requires greater investments. This is attributable to the fact that during advocacy and policy design, costs were primarily concentrated on staff salaries, with expenses for evidence generation mitigated through partnerships with civil society. In contrast, providing implementation support necessitates more efforts to engage with diverse subnational stakeholders, particularly in federal and decentralized countries such as Argentina. Hence, the financial and human resources needed for implementation are higher than in the previous stages.

Considering Argentina's highly decentralized federal structure, in which the implementation of national laws depends on the engagement and capacity of all 23 provinces, UNICEF plans to intensify its efforts in building the capacity of provincial and municipal bodies to implement the Healthy Eating Promotion Law, including FOPNL, food and beverage marketing regulations, and healthier school environments.' Currently, through the *Municipio Unido por la Niñez y la Adolescencia* (Municipality united by children and adolescents) initiative (MUNA), UNICEF is providing guidance and training to municipal staff and supporting them in the design, implementation and monitoring of action plans for children and adolescents to create healthy environments in children's settings, such as schools, early childhood development centres, etc.<sup>71</sup> In 2022, UNICEF trained technical teams from 20 municipalities in five provinces on the provision of healthy foods in schools in line with the FOPNL law.<sup>72</sup> The CO intends to expand this initiative to other municipalities and provinces to support policies included in the Healthy Eating Promotion Law.



Young girl at the supermarket, Ciudad de México.  
© UNICEF/UN0567913/Carrillo

71 *Municipio unido por la niñez y la adolescencia (MUNA)*. (n.d.). UNICEF. Retrieved from <https://www.unicef.org/argentina/muna>.

72 UNICEF. (2022). *Education, Health and Nutrition Case Study*. Retrieved from <https://www.unicef.org/media/131296/file/Improving%20child%20and%20adolescent%20health%20and%20nutrition%20through%20policy>.

UNICEF Mexico acknowledges the strategic importance of the child obesity and overweight agenda. For the next stages of implementation, the country office supported the reform to the General Education Law regulating the food environments in schools, including regulating foods with front-of-pack labels. UNICEF participated in policy dialogue and joint positioning with FAO and INSP, communicating support for the reform,<sup>73</sup> which was approved in November 2023. Furthermore, UNICEF plans to implement nutrition mobile units to encourage healthier diets among children and caregivers through cooking and recreational activities related to the campaign *Heroes for Health* in impoverished neighbourhoods of Mexico City and Merida. The prioritization of FOPNL in UNICEF Mexico is strengthened by the recognition of the prevention of overweight and obesity agenda as a top priority by the government and UNICEF HQ, providing both funding and technical support. For instance, HQ played a pivotal role by offering legal advice during the concluding stages of FOPNL negotiations, when the CO encountered challenges in advocating for the inclusion of artificial sweeteners in labels due to a lack of evidence on their harmful effects. On that occasion, the HQ legal team provided guidance on how to approach this issue from a preventative perspective.

## Factors impeding the progress of UNICEF's work on front-of-pack nutrition labelling

**Finding 5: Interference from the food and beverages industry during the policy discussion process caused delays in FOPNL approval in both countries. UNICEF Argentina and Mexico have terminated associations with these companies to avoid conflict of interest that may undermine their advocacy position.**

In both countries the food and beverage industry emerged as a strong opponent to the approval of FOPNL policies, employing strategic tactics to impede progress across the different stages of policy establishment. In Argentina, specific examples highlight attempts by the food and beverage industries to influence the policy discussion and approval processes. Notably, Coca-Cola directly contacted senators, proposing amendments to the Healthy Eating Promotion Law.<sup>74</sup> In response, UNICEF terminated all fundraising affiliations with Coca-Cola to mitigate a potential conflict of interest. Termination of partnerships with the ultra-processed food industry was prescribed in 2023 as an organization-wide norm guidance on engaging with the food and beverage industry. Complementing these efforts, UNICEF Argentina maintained a constant presence in mass media through opinion articles, reinforcing advocacy for health-oriented policies.

In Mexico, food and beverage industries engaged in advocacy, lobbying and legal action at different stages of the norm change, particularly during the approval by the Chamber of Deputies and before its official publication. During the approval and discussion phases, UNICEF countered misinformation tactics by actively generating evidence and sharing information booklets with legislators. There are indications that the industry also attempted to deflect blame by denying and counter-arguing evidence presented in the proposed norm during

73 SNDIF and CENAPRECE. (2023). *Posicionamiento conjunto para proteger el principio del interés superior de la niñez, para gozar de una alimentación saludable*. Retrieved from: <https://www.gob.mx/difnacional/documentos/posicionamiento-conjunto-para-protger-el-principio-del-interes-superior-de-la-ninez-para-gozar-de-una-alimentacion-saludable?idiom=es>.

74 INSP and UNICEF. (2021). *Experiences in the design and implementation of front-of-pack nutrition warning labels in Latin America and the Caribbean*. Retrieved from <https://www.unicef.org/lac/media/29541/file/Labeling-regional-experiences.pdf>.

the open consultation stage. Some industry stakeholders intensified lobbying with decisionmakers during the period before its official publication. UNICEF increased advocacy activities at this time, including publishing press releases highlighting the ‘best-in-world’ nature of the new norm.<sup>75</sup> Countries hosting some of the world’s largest food corporations, including the United States, European Union, Canada, and Switzerland, pressured Mexico to delay the law’s approval. The significant opposition was further fuelled by Mexico’s standing as the primary consumer of processed food in Latin America<sup>76</sup> and the fourth largest globally.<sup>77</sup>

Following the official norm change, the industry undertook legal action - namely, “amparo trials”<sup>78</sup> to impose exceptions to the norm enforcement, which can pose precedents that hinder its validity in the long term. Approximately 40 big companies, including Coca-Cola, presented amparo trials, arguing that there was no clear evidence that labelling has a positive impact. UNICEF Mexico intended to prevent the positive resolution of amparo trials and therefore partnered with civil society and the Ombudsman for Children and Adolescents to serve as the official legal representation of Mexican children and adolescents in court during the trials. Moreover, UNICEF coordinated efforts, along with PAHO and CSOs, to disseminate key messages among ministries and judges involved and facilitated dialogue among legal teams from the Ministry of Health and the Ombudsman for Children and Adolescents in the judiciary, joining efforts against the positive resolution of these trials.

The judiciary has yet to state the negative outcome of the trials and declare the constitutionality of the front-of-pack warning labelling and its implementation. Certain amparo trials, referred to in the Plenary of the Supreme Court, remain unresolved. UNICEF

Mexico anticipates slow resolution of the ongoing trials and expects new appeals from the food and beverage industry in 2024. The CO has assigned staff time for defending the labelling law in its 2024 workplan.

In both countries, UNICEF took action to avoid and eliminate conflict of interest while commencing policy advocacy for introducing FOPNL. After initiating support for FOPNL, UNICEF Argentina adhered to guidelines avoiding participation in events sponsored by these entities and refrained from engagements that could give rise to a conflict of interest. Notably, the senior leadership at UNICEF Mexico pioneered the decision to terminate all collaborations and funding partnerships with the ultra-processed food and beverage industry and inspired action at the HQ level to publish new programming guidance on engagement with the food and beverage industry in 2023 to consolidate their position to remove all conflict of interest before initiating policy action.<sup>79</sup> This strategic positioning by the country office representative, played a vital role in enhancing UNICEF’s legitimacy for promoting FOPNL.

75 UNICEF. (2020). *Front Labelling of food and beverages approved in Mexico, “one of the best in the world”*. Retrieved from <https://www.unicef.org/mexico/comunicados-prensa/unicef-el-etiquetado-frontal-de-alimentos-y-bebidas-aprobado-en-m%C3%A9xico-de-los#:~:text=Ciudad%20de%20M%C3%A9xico%2C%205%20de,consumidores%20sobre%20el%20exceso%20de>

76 *What are we waiting for?* (n.d.). UNICEF. Retrieved from <https://www.unicef.org/stories/what-are-we-waiting-for-obesity-mexico>.

77 Busby, M. (2022, November 4). *Sugar rush: how Mexico’s addiction to fizzy drinks fuelled its health crisis*. The Guardian. <https://www.theguardian.com/global-development/2022/nov/04/sugar-rush-how-mexico-addiction-to-fizzy-drinks-fuelled-its-health-crisis-acc>.

78 Judicial action in Mexican law to protect individuals against authorities’ actions that violate the Mexican Constitution.

79 UNICEF. (2023). *Engaging with the Food and Beverage Industry: UNICEF Programme Guidance*. Retrieved from [https://www.unicef.org/media/142056/file/Programme Guidance on Engagement with the Food and Beverage Industry.pdf](https://www.unicef.org/media/142056/file/Programme%20Guidance%20on%20Engagement%20with%20the%20Food%20and%20Beverage%20Industry.pdf).

**Finding 6. Decentralized regulatory frameworks and unequal implementing capacities across provinces in Argentina, and insufficient policy harmonization in Mexico pose challenges to FOPNL implementation.**

The federal structure in Argentina is decentralized and presents significant challenges to the implementation of FOPNL in provinces, as the execution of national laws depends on the commitment and capabilities of all 23 provincial governments. Consequently, challenges in implementation vary considerably across provinces, requiring different levels of support to address specific complexities unique to their contexts. Upon request from the Ministry of Health, UNICEF currently engages with four provinces (Salta, Chaco, Santa Fe, and Jujuy) in efforts to harmonize initiatives related to school environments.

Varying levels of commitment across provincial governments, with differing perceptions on the importance of the Healthy Eating Promotion Law pose a significant challenge for implementation in Argentina. The heterogeneity of bureaucratic

processes across provinces for FOPNL harmonization, including sourcing food for schools, poses a challenge to ensuring standardized local implementation. For instance, one major challenge concerns support and coordination with local producers to facilitate the adoption of labelling in locally produced foods and an effort to reformulate unhealthy products to fit into the Law on Promotion of Healthy Eating norms and be suitable for sale at school kiosks. Fragmented political commitment at subnational level requires engagement with several different ministries across provinces, creating a greater burden for UNICEF. Moreover, funding for FOPNL implementation differs across provinces, with the national government, provincial governments, and schools making different contributions. Notably, the FOPNL law does not include clear guidelines for subnational implementation and may require complementary regulations at provincial level to ensure compliance.<sup>80</sup> UNICEF has already initiated steps to formalize guidance so that regional and local governments can create healthier food environments in schools and communities for children and adolescents. In 2022, UNICEF Argentina commissioned FAGRAN to map and analyse successful experiences of the promotion of healthy food environments at the municipal level with the aim of sharing best practices with local authorities and



In the rural community of Juil, Guatemala, a woman teaches children the importance of a healthy diet.  
© UNICEF/UNI465682/Flores

80 *Labeling law: Córdoba can move towards the best standard.* (2023, October 24). Retrieved from <https://fundeps.org/en/labeling-law-cordoba/>.

decisionmakers, in line with the MUNA framework.<sup>81</sup> Similarly, UNICEF provided financial and technical support to the National Coalition to Prevent Obesity in Children and Adolescents to develop a guidance tool on the supply and provision of healthy foods in line with the provisions of the Law on Promotion of Healthy Eating.<sup>82</sup> The 2023 document, published earlier this year, clearly prescribes the exclusion of food and beverage products with warning labels from school food environments.

In Mexico, the scope of the norm modification did not include considerations for implementing FOPNL in schools by mandating restrictions to labelled food without warnings. The recently approved Education Reform<sup>83</sup> presents a milestone in improving the harmonization of FOPNL in school environments, prohibiting the sale of foods with low nutritional value and high caloric content in the vicinity of schools, and promoting healthy and local food sourcing. UNICEF Mexico plans to leverage the opportunity provided by the Education Reform's to engage with the Ministry of Human Capital (formerly the Ministry of Education which has been integrated into this new ministry) and reopen previously unsuccessful discussions to modify national guidelines for the sale and distribution of food in schools and mandate exclusion of marketing and sale of ultra-processed foods and beverages with warning labels. The CO is also contemplating assigning a dedicated budget to disseminate the new guidelines once developed to schools across the country to support the harmonization of FOPNL and the new Education Law's implementation sub nationally. A 2022 study by UNICEF LACRO of urban food environments in Mexico City found that despite the adoption of FOPNL, restrictions on marketing of unhealthy foods to children and

sugar-sweetened beverage taxes at the federal level, children's exposure to unhealthy foods in the city was still very high in 2021, albeit only one year after the law's passage. The same 2021 data showed that while labelling appeared to have a positive effect on families' preference at points of sale, it was not enough on its own to prevent childhood overweight and obesity.<sup>84</sup> Notably, UNICEF provided financial and technical support to the revision of Mexico's FBDGs earlier in 2023. The revised FBDGs are harmonized with the FOPNL law, recommending that the Mexican population avoid ultra-processed foods and choose homemade food or options that are low in saturated fat, salt, and sugar by carefully reading nutrition labels.<sup>85</sup> The FBDGs also introduced a new 'empty' 'Plato del bien comer' (plate of good eating) provision that allows states to regionalize their plate recommendation based on geographically available healthy food alternatives. UNICEF Mexico also initiated a subnational partnership with the Congress of Yucatan to strengthen regional regulations to improve food environments, including in schools.<sup>86</sup> Another important challenge related to FOPNL is the implementation of mandatory and clear labelling of baby foods.

- 
- 81 UNICEF Argentina. (2022). *Mapeo y análisis de experiencias exitosas y actores que faciliten la promoción de entornos saludables para niños, niñas y adolescentes a nivel municipal*. Retrieved from [https://www.unicef.org/argentina/media/17566/file/Mapeo\\_y\\_an%C3%A1lisis\\_de\\_experiencias\\_exitosas\\_y\\_actores\\_que\\_faciliten\\_la\\_promoci%C3%B3n\\_de\\_entornos\\_saludables\\_para\\_ni%C3%B1os,\\_ni%C3%B1as\\_y\\_adolescentes\\_a\\_nivel\\_municipal.pdf](https://www.unicef.org/argentina/media/17566/file/Mapeo_y_an%C3%A1lisis_de_experiencias_exitosas_y_actores_que_faciliten_la_promoci%C3%B3n_de_entornos_saludables_para_ni%C3%B1os,_ni%C3%B1as_y_adolescentes_a_nivel_municipal.pdf).
- 82 National Coalition to Prevent Obesity in Children and Adolescents and UNICEF Argentina. (2023). *ENTORNO ESCOLAR SALUDABLE: Herramientas prácticas para su implementación*. Retrieved from <https://www.prevenirobesidadinfantil.org/>.
- 83 Araujo, M. S. R. (2023, February 9). *Coordinación de Comunicación Social - Aprueba Senado reformas que fomentan consumo de alimentos saludables en escuelas*. Retrieved from <https://comunicacionsocial.senado.gob.mx/informacion/comunicados/4951-aprueba-senado-reformas-que-fomentan-consumo-de-alimentos-saludables-en-escuelas>.
- 84 UNICEF. (2022). *Improving School Food Environments to Prevent Childhood Overweight and Obesity in Latin America and the Caribbean: Diagnosis and Recommendations*. Retrieved from <https://www.unicef.org/lac/en/media/40631/file/UNICEF-Improving-urban-food-environments.pdf>.
- 85 SSA, INSP, GISAMAC and UNICEF. (2023). *Guías alimentarias saludables y sostenibles para la población mexicana 2023*. Retrieved from [https://movendi.ngo/wp-content/uploads/2023/05/Gu%C3%ADas\\_Alimentarias\\_2023\\_para\\_la\\_poblaci%C3%B3n\\_mexicana.pdf](https://movendi.ngo/wp-content/uploads/2023/05/Gu%C3%ADas_Alimentarias_2023_para_la_poblaci%C3%B3n_mexicana.pdf).
- 86 UNICEF. (2022). *Results Assessment Modules Report*. Retrieved from UNICEF InSight Portal.



UNICEF Brazil organized a meeting aimed at promoting citizen participation and awareness around the relationship between food systems and climate crisis. © UNICEF/UNI542122/Marques

## Learnings and Recommendations

### Learnings

UNICEF country offices and National Committees aiming to support the formulation, approval, and implementation of FOPNL legislation can gain valuable insights from the good practices observed in UNICEF's Argentina and Mexico.

**Partnering with national research institutions to produce and mobilize evidence was a key enabler during the policy approval process by strengthening the credibility of UNICEF evidence.**

In 2021, governments in only 12 countries globally had mandated FOPNL on industrially processed foods and beverages. With most legislation having been introduced less than a decade ago, there is a limited evidence base to demonstrate the efficacy of FOPNL in reducing the consumption of unhealthy foods and beverages. UNICEF is key in mobilizing global evidence on FOPNL's effectiveness, sharing best practices related to its formulation and implementation, and generating local evidence on the existing voluntary, often industry-led, labelling systems and gaps. Given the centrality of FOPNL in UNICEF's overweight and obesity prevention agenda and mandate, partnering with national academic and research organizations to contextualize global evidence and conduct replicable local

studies is useful to strengthen the credibility of its advocacy efforts with governments, policymakers, and the public.

**Building capacity of UNICEF staff on common industry interference tactics and potential counter-responses by governments and international organizations can help COs support approval processes for food environment policies like FOPNL.**

Misinformation tactics used by the food and beverage industry often question the effectiveness of food environment policies in improving health outcomes and frame them as threats to economic growth and jobs. This also creates a narrative of FOPNL policies being anti-poor and costly for the government and the public. One means of countering this and other industry tactics (4D-Delay, Divide, Deny and Deflect) is through knowledge sharing events with experts and technocrats from experienced countries without conflict of interest (like the workshop organized by UNICEF Mexico where the Argentina country office also participated). Such events can help build the capacity of UNICEF staff and their partners in the government and CSOs to adequately prepare for direct (press releases, court cases) and indirect (sponsored social media content) pushback by the food and beverage industry. UNICEF has published multiple guidance documents on this topic that COs

can disseminate and discuss with staff and partners. Eliminating partnerships with ultra-processed food and beverage industries is a crucial precursor to undertaking effective political advocacy against industry interference.

**Undertaking engagement at the executive and legislative level of government is critical for UNICEF to support the achievement of meaningful food environment policy changes.**

Both country offices in Argentina and Mexico undertook extensive engagement at the executive (in the form of participation in roundtables, provision of direct technical support, evidence sharing) and legislative (in letters to the Senate, organizing parliamentary debate, generating policy briefs targeting policymakers, etc.) levels to support evidence-based policymaking and timely approval of the FOPNL legislation. This approach contributed to successful policy advancements by both COs.

**Clear policy implementation guidelines are critical to facilitate timely and consistent implementation of FOPNL standards at national and subnational level.**

A critical and practical aspect of UNICEF's technical assistance to Ministries of Health and associated agencies during policy design stages is guiding the government to extensively deliberate on and develop clear implementation timelines and plans as part of the legislation document (policy or norm modification notes). Delays or barriers to policy implementation are overcome, in part, by clarifying the roles and responsibilities of different stakeholders for effective coordination and accountability and reducing scope for private sector lobbying at the sub-national level. An independent review of early-stage implementation in Mexico found evidence of high compliance and reformulation of unhealthy products by some companies.<sup>87</sup> This can be attributed to the clear instructions in the norm modification notice

regarding the phase-wise implementation plan over five years. On the other hand, Argentina's policy is unclear on subnational implementation, given its decentralized nature, and has led to considerable delays in provincial and municipal level implementation of the Healthy Eating Promotion Law, including FOPNL, food and beverage marketing regulations, and healthier school environments.

**UNICEF country office senior leadership must lend strategic support to staff on food environment policy actions by taking steps to remove any existing or potential conflict of interest to strengthen credibility.**

There is evidence from both UNICEF Argentina and Mexico of the enabling role senior leadership (representatives, deputy representatives, section chiefs) can play in undertaking successful and credible advocacy with the government on regulatory policies. Taking an unwavering stance to align the CO's actions and partnerships with the UNICEF HQ guidance on engagement with the food and beverage industry is critical to eliminate conflict of interest and avoid reputational risks for UNICEF. Leadership can also support staff in advocacy processes by actively engaging in policy dialogues with high-level political leaders and policymakers.

**Prioritizing the establishment of a clear FOPNL policy can lay the groundwork for effective conceptualization and implementation of related food environment regulatory policies (increasing taxes on sugar-sweetened beverages, restricting marketing of unhealthy foods and beverages directed to children, improving school food environments).**

Establishing comprehensive standards to determine products requiring front-of-pack nutrition labels is powerful in easily identifying unhealthy foods and beverages detrimental to children's diets and health. The objective of a standardized identification process can significantly help harmonize other food environment policies. Subsequent laws can clearly delineate

87 Crosbie, E., Otero Alvarez, M. G., Cao, M., Vejar Renteria, L. S., Rodriguez, E., Larrañaga Flota, A., & Carriedo, A. (2023). *Implementing front-of-pack nutrition warning labels in Mexico: Important lessons for low- and middle-income countries*. Retrieved from <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10564596/>.

which products cannot be marketed to children, promoted, and sold in schools, and require increased taxation by the government.

**Public awareness and demand creation campaigns on FOPNL use should complement policy approval and implementation to influence consumer behaviour change on consuming unhealthy foods and beverages.**

UNICEF guidance clearly outlines the importance of public education campaigns to promote long term consumer behaviour change. In Argentina and Mexico, UNICEF has undertaken activities to raise public awareness about the importance and use of front-of-pack nutrition labels to make informed and healthy food purchasing decisions. In Argentina, UNICEF, PAHO and FAO launched a social media campaign during the law's discussion in the Chamber of Deputies to enhance public awareness and support for the FOPNL law. The campaign used hashtags like #EyesClosed and #LabellingLawNow to highlight the lack of information available to consumers to avoid unhealthy foods and the urgent need for mandatory FOPNL standards. In addition to reaching 250,000 social media users, the initiative also included calls to action for legislators to pass the pending legislation. Upon the law's approval, UNICEF posted blogs to debunk myths related to FOPNL. UNICEF Argentina is also working towards including information on FOPNL in school nutrition education.

In Mexico, UNICEF's support for government-led action in education includes support for the Ministry of Health in producing audio-visual content with story-telling elements to publish on social media for the Heroes for Health campaign. The campaign reached millions, and the ministry and UNICEF will continue its implementation for the next two years. The CO also supported the inclusion of FOPNL use in the 2023 Food-based Dietary Guidelines, a document which will act as a reference for all government nutrition education programmes and materials in the country.

## Recommendations

The findings support four recommendations for the UNICEF country offices in Argentina and Mexico to strengthen their ongoing work on FOPNL initiatives.

**Maintain national dialogue and policy research support with government officials on the relevance of FOPNL as an overweight and obesity prevention and healthy diets promotion measure.**

While both COs have effectively achieved the medium-term goals of FOPNL policy advances, institutionalizing and sustaining these results requires continued efforts during an extended implementation phase and ongoing compliance efforts. The findings motivate the recommendation that UNICEF COs continue to support government and legislative counterparts on FOPNL policies, particularly by mobilizing and sharing evidence on childhood overweight and NCD rates and the ongoing urgent need for adherence to FOPNL standards by all relevant stakeholders. Country offices can also support the generation of monitoring reports to inform government action on expediting implementation. UNICEF should continue to engage in extensive public advocacy to forward the FOPNL and overweight and obesity agenda and build pressure and political will among the newly elected legislative members and newly appointed executives.

**Increase the allocation of funding and human resources to scale FOPNL-related work across provinces in Argentina and broaden partnerships with civil society organizations with potential subnational reach in Mexico.**

Despite UNICEF Argentina's strategic establishment, financing, and coordination of the National Coalition to Prevent Children's Obesity (comprising multiple organizations with a strong subnational presence) the federal structure of the country requires more human resources and financial investment from UNICEF to ensure effective implementation of the FOPNL law in all provinces. The team recommends that UNICEF Argentina explore options with the Ministry of Health to publish a follow-up implementation plan for the Healthy Eating Promotion Law adoption by provincial and municipal governments. As demonstrated in the case of Mexico (phased implementation between October 2020 and October 2025), specifying a clear and realistic timeline for enforcement of the FOPNL law may help streamline implementation and aid effective monitoring and accountability.

The team recommends that UNICEF Mexico diversifies its partnerships with academic institutions and CSOs to strengthen its support to the government on policy harmonization and implementation at subnational level. While INSP and UNICEF have successfully partnered on multiple reports related to FOPNL, soliciting the participation of other research institutions may help further strengthen the credibility of evidence. Learning from the Argentine experience, UNICEF Mexico can join existing or establish new coalitions and advocacy groups by identifying organizations with a substantial local presence. Such collaborations can help the CO scale up regional government partnerships for the improvement of food environment-related subnational laws in other regions (like the model implemented in Yucatan).

**Maintain senior leadership's support for continued non-negotiable conflict of interest positioning of UNICEF COs in both countries.**

Nutrition staff in both country offices should continue to internally advocate with UNICEF senior leadership on avoiding financial and non-financial engagement with food and beverage companies that produce unhealthy products or interfere in policy processes



Two women compare different types of product in a supermarket in Lima, Peru.  
© UNICEF/UN0845376/Goupil

that aim to improve the country's food environment for children. The termination of credibility-threatening partnerships must extend to all programmatic and non-programmatic sections, and strong buy-in from leadership is key to achieving that goal and best practice. Country offices can organize meetings and workshops to sensitize and capacitate all staff on the official principles of engagement with the food and beverage industry and discuss examples or cases that may directly or less obviously jeopardize UNICEF's positioning in policy processes.

**Strengthen support for policy harmonization of FOPNL with other laws and frameworks and monitor law enforcement and subsequent product reformulations in Argentina and Mexico.**

UNICEF Argentina's recent report on the food situation of children highlighted the persisting high rates of unhealthy food consumption and emphasized the importance of improving school food environments by restricting the distribution, marketing and sale of food with warning labels in educational settings.<sup>88</sup> Despite the Healthy Eating Promotion Law's comprehensive harmonization of FOPNL mandates with restrictions on marketing to children and improving school food environments, efforts by UNICEF to undertake regional advocacy and technical support for municipal and provincial governments can address the law's unclear provisions and instructions for subnational governments and implementation agencies. UNICEF Argentina can support, learn, and help replicate the project being led by city legislators and FUNDEPS in Córdoba to support the passage of complementary local legislation in support of the national FOPNL law.<sup>89</sup> The proposed local bill in Córdoba which prohibits the offer, sale and advertising of products with warning labels in all schools aims to establish a precedent for local complementary legislation to aid subnational implementation, and if successful, could be replicated with the support of UNICEF in other cities and regions. UNICEF's ongoing capacity

building efforts to strengthen the work of coalition partners at subnational level can help expedite the scale-up in coming years.

In contrast to Argentina's law, Mexico's FOPNL legislation does not harmonize its application with initiatives to improve school food environments. With the recent passage of norm modifications and reforms on healthy school environments and restrictions on the marketing of unhealthy foods and beverages to children in Mexico, UNICEF should utilize the opportunity to support governments at national and local level to implement and monitor bans on the sale of foods with warning labels in schools. UNICEF should support the scale up of the innovative monitoring system of school food standards developed for Yucatan (in collaboration with the Ministry of Health, Ministry of Education, and additional partners) to other regions. Furthermore, the country office should initiate dialogue with and provide technical support to the Ministry of Health to expand FOPNL and related legislation to cover baby foods (formulated for infants and children aged under two) and digital marketing by the food and beverage industry.

Both country offices should closely monitor the ultra-processed food and beverage industry's food reformulation response to the FOPNL mandates. Recent experience in Chile shows that some companies are reformulating their products marginally below the sugar, salt, fat, etc., thresholds (above which the legislation enforces mandatory labels) and marketing them as 'healthy' by virtue of not having a label.

88 UNICEF and FIC (2023). Situación alimentaria de niños, niñas y adolescentes en Argentina. Retrieved from: <https://www.unicef.org/argentina/informes/situacion-alimentaria-de-ninos-ninias-y-adolescentes>.

89 *Labeling law: Córdoba can move towards the best standard.* (2023, October 24). Retrieved from <https://fundeps.org/en/labeling-law-cordoba/>.



Children from the Early Childhood Center of the Municipality of Guatemala receive food in the center's dining room.  
© UNICEF/UNI569427/Willocoq

## Annex 1: List of Key Informants Interviewed

Name of Key Informant	Position	Organization
<b>Mexico</b>		
Fiorella Espinosa	Nutrition Officer - Mexico	UNICEF
Mauro Brero	Chief Nutrition - Mexico	UNICEF
Catalina Gomez	Chief Social Policy - Mexico	UNICEF
Karina Sánchez Bazán	Food and Development Policy Consultant	Ex-FAO
Simon Barquera	Director of the Nutrition Policies and Programs Research Area, Nutrition and Health Research Center	Instituto Nacional de Salud Pública
Paulina Magaña	Food Policy Campaign Coordinator	El Poder del Consumidor
Alejandro Calvillo	President	El Poder del Consumidor
<b>Argentina</b>		
Verónica Risso Patrón	Nutrition Officer - Argentina	UNICEF
Luisa Brumana	Representative - Argentina	UNICEF
Victoria Tiscornia	Nutrition Researcher	FIC
Luciana Castronuovo	Project Coordinator	FIC
Carolina Tamagnini	Executive Director	FUNDEPS
Ana Caceres	President	FAGRAN
Malena Giai	Coordinator of the National Healthy Eating and Obesity Prevention Program	Ministerio de Salud



A child runs past a billboard for fast food on his way, Santiago, Chile.  
© UNICEF/UN0805425/Goupil

## Annex 2: Key Informant Interview Protocols (Including Informed Consent)

### For UNICEF Staff

#### Introduction:

Hello, thank you for joining us for this interview. I am <insert name>, a researcher with the Economic Policy Research Institute, a social policy think-tank based out of South Africa specialising in research, evaluation, capacity building and policy advisory. UNICEF has commissioned EPRI to examine UNICEF's Work on Overweight and Obesity Prevention Among Children and Adolescents. As part of this study, EPRI is conducting interviews to evaluate the results of specific programmes/policy actions at the country level. We have identified your country as a relevant example for a case study on 'front-of-pack nutrition labelling'. For this reason, we are interested in getting information from key stakeholders willing to share their experiences and knowledge with us. Please note that there are no 'right' or 'wrong' answers. We would like to hear about your experiences and opinions so please feel free to share these with us as openly and honestly as possible. The interview will be one hour long.

#### Consent for Recording and Use of Transcripts:

In order to maximise the utilisation of insights generated during this interview, we would like to record the interview and use its transcripts for direct and

indirect reference while drafting the reports. Kindly note that you will not be personally identified in any reporting of the findings. The data from this interview will be kept confidential and will only be shared with EPRI team and relevant UNICEF members who are also bound by confidentiality requirements. Your name will only appear in the list of key informants in the annex of the reports. Do you give consent to this interview being recorded?

**Consent for Participation:** Thank you for sharing your consent to record the interview. Now we would like to take your consent to participate in the interview. Please note that your participation is voluntary, and you may choose to not respond to any or all questions or may withdraw any time without consequences. Do you give your consent to participate in the interview?

Thank you for your consent to participate in the interview. Before we start, I want to highlight that in case of queries or concerns after this interview, you can contact Sonia Jose, senior researcher from EPRI at [sjose@unicef.org](mailto:sjose@unicef.org). In case you would like to keep the query within UNICEF, please reach out to Beth Ann Plowman, the Evaluation Manager at UNICEF EO at [baplowman@unicef.org](mailto:baplowman@unicef.org).

We would now like to start the interview by asking you a few questions. Please feel free to venture

beyond the scope of our questions if you deem it necessary and useful. These questions are only guiding.

### Questions on overall work by the UNICEF CO/NC on overweight and obesity prevention work

1. To what extent is childhood and adolescence obesity prevention a priority for your CO/NC?
2. What factors led to the CO/NC initiating work that is specific to addressing this issue?
3. In what ways is the CO/NC working to address childhood and adolescent obesity prevention in your country?
4. How has the CO/NC mobilised evidence on childhood overweight and obesity in the country context? How has this evidence shaped NC's approach on this issue?
5. What has UNICEF CO/NC done to raise the interests of the government and partners to address this issue?
  - ▶ To what extent has this been effective?
6. How does the CO/NC view the efficacy and feasibility of 'increasing taxes on unhealthy foods and beverages' as a policy action in the country's context? Is it a priority in the CO's work on overweight and obesity prevention? Why/why not?

### Overview of questions focusing on the case study topic

Based on desk review and inception interviews, we have identified 'Front-of-Pack Nutrition Labelling' as the focus area for your CO/NC. For the remainder of the interview, we would ask you to reflect on this main programme area i.e., 'front-of-pack nutrition labelling'.

1. When did the CO/NC begin its work on this programme/policy action? How did the CO/NC determine this programme/policy action as a focus area for UNICEF's work in the country? What are the factors that contributed towards this decision?
2. What were the main objectives of this programme/policy action?
3. What are the main activities undertaken under this programme/policy action?

4. Who are the key UNICEF staff working on this programme/policy action?

### Relevance/Appropriateness

1. To what extent are the activities appropriate to achieve the intended results? How did the CO/NC mobilise and utilise evidence to determine the approach/activities?
2. How have external factors like political issues, shocks etc., impacted the action's design, planning and/or implementation? How did the CO/NC adapt to these changes?

### Coherence

1. To what extent does the programme/policy action align with the government's national priorities and plans?
2. How does this programme/policy action build on or complement UNICEF's work in nutrition and other sections? In what ways does it compete with UNICEF's work in nutrition and other sections?
3. Is this programme/policy action also a priority of other UN organisations/international organisations/NGOs or coalitions etc.? In what ways is UNICEF leveraging partnerships to implement this programme/policy action?

### Effectiveness

1. To what extent has the programme/policy action made progress in achieving its objectives? Is the progress satisfactory/faster/slower than planned? (Probe: understand factors accelerating or impeding progress)
2. In what ways are the progress/results achieved attributable to UNICEF's efforts? (Probe: what they think is UNICEF's comparative advantage/unique contribution)
3. Please discuss some of the main challenges UNICEF has faced/is facing in the design/implementation stages? *ask if relevant to policy action/programme*

### Efficiency

1. How well is the programme/policy action funded and staffed to achieve its intended outcome and impact? What cost-effectiveness measures, if any, has the programme implemented?

2. How is UNICEF implementing their programme/policy action activities as per the planned time frame?

### Sustainability

1. How is UNICEF working to build local capacity to support this policy action/programme in the long term? *(if relevant)*
2. In what ways is the policy action/programme equipping the government and strengthening government systems to scale up and sustain the programme? *if relevant*

### Comprehensiveness

1. What additional areas could UNICEF CO/NC focus on to address overweight and obesity prevention more comprehensively?
2. What plans does the CO/NC have to increase its impact in this country?

### UNICEF positioning and leadership

1. In your opinion, how has HQ's strategic and programming guidance (via guiding documents, evidence, direct technical assistance etc.) supported the design and implementation at the country level? Are there any gaps or emerging needs the HQ can fulfil?
2. What was/is the support provided by UNICEF RO in designing and implementing this and other programmes/policy actions? Are there any gaps or emerging needs the RO can fulfil?
3. What conflicts of interest, if any, does UNICEF potentially face for the implementation of overweight and obesity prevention and management? And how is HQ/RO helping COs/NCs to manage conflicts of interest in this policy agenda?

### Learning

1. What are the key lessons learned from your experience in working on this case study area that other countries may benefit from? (success factors, impeding factors, preparatory steps etc.)
2. Are there any documents you could share with us that highlight your work on this issue?
3. Would you like for us to speak to any other internal or external stakeholder for this study?

## For Government Stakeholders

**Introduction:** Hello, thank you for joining us for this inter-view. I am <insert name>, a researcher with the Economic Policy Research Institute, a social policy think-tank based out of South Africa specialising in research, evaluation, capacity building and policy advisory. UNICEF has commissioned EPRI to examine UNICEF's Work on Overweight and Obesity Prevention Among Children and Adolescents. As part of this study, EPRI is conducting interviews to evaluate the results of specific programmes/policy actions at the country level. We have identified your country as a relevant example for a case study on 'front-of-pack nutri-tion labelling'. For this reason, we are interested in getting information from key stakeholders willing to share their experiences and knowledge with us. Please note that there are no 'right' or 'wrong' answers. We would like to hear about your experiences and opinions so please feel free to share these with us as openly and honestly as possible. The interview will be one hour long.

### Consent for Recording and Use of Transcripts:

In order to maximise the utilisation of insights gener-ated during this interview, we would like to record the interview and use its transcripts for direct and indirect reference while drafting the evaluation reports. Kindly note that you will not be personally identified in any reporting of evaluation's findings. Your name will only appear in the annex of the eval-uation reports. The data from this interview will be kept confidential and will only be shared with EPRI team and relevant UNICEF members who are also bound by confidentiality requirements. Do you give consent to this inter-view being recorded?

**Consent for Participation:** Thank you for sharing your consent to record the interview. Now we would like to take your consent to participate in the interview. Please note that your participation is voluntary, and you may choose to not respond to any or all questions or may withdraw any time without conse-quences. Do you give your consent to participate in the interview?

Thank you for your consent to participate in the interview. If you have any queries or concerns after this interview, please contact Sonia Jose, senior researcher from EPRI at [sonia@epri.org.za](mailto:sonia@epri.org.za). In case you would like to direct the query to UNICEF, please reach out to Beth Ann Plowman, the Evaluation Manager at UNICEF EO at [baplowman@unicef.org](mailto:baplowman@unicef.org).

We would now like to start the interview by asking you a few questions. Please feel free to venture beyond the scope of our questions if you deem it necessary and useful. These questions are only guiding.

### **Questions on UNICEF's support for overall work on preventing childhood and adolescence overweight and obesity**

1. How has UNICEF generated or used quality evidence to inform government programme and policy work on preventing childhood and adolescence overweight and obesity?
2. In what ways has UNICEF been successful in elevating priority for childhood and adolescence overweight and obesity prevention as an issue in this country? (examples include integration into national development plans, health or education policy, increase in funding, engagement of political champions, high level forums, media etc)
3. What areas of overweight and obesity prevention and management is UNICEF supporting the most in this country?
4. How does the national government *view the effectiveness and feasibility of 'increasing taxes on unhealthy foods and beverages' as a policy action to prevent childhood and adolescence overweight and obesity? Is it a current priority for the government?*
5. Which areas of overweight and obesity prevention and management could UNICEF do more to support in the future?

Based on initial desk review and interviews, we have identified <country name> as an important example to understand the work being done on the case study topic: 'front-of-pack nutrition labelling'. For the remainder of the interview, we would ask you to reflect on this one main policy action.

1. What are the key objectives of the programmes/policy actions? How will they contribute towards preventing childhood and adolescence overweight and obesity in the country?
2. How has UNICEF generated or used evidence to inform programme and policy work on both case study areas?
3. How has UNICEF supported the planning/design/implementation/M&E of case study areas? What, if any, was UNICEF's unique contribution towards this work?
4. How has UNICEF worked with different government sectors to advance efforts on both case study areas?
5. What ways has UNICEF built the capacity of policymakers and government staff to plan/design/implement work on both case study areas?
6. How has UNICEF used their available financial and human resources efficiently in supporting the case study areas?
7. How has UNICEF ensured coherence and integration of the case study areas into the country's other policy priorities?

### **Way forward:**

1. What more can UNICEF do to support advancing the agenda on overweight and obesity prevention in the country? Are there any gaps in UNICEF's current support that could be further improved upon?

## For Non-government Stakeholders

**Introduction:** Hello, thank you for joining us for this interview. I am <insert name>, a researcher with the Economic Policy Research Institute, a social policy think-tank based out of South Africa specialising in research, capacity building and policy advisory. UNICEF has commissioned EPRI to examine UNICEF's Work on Overweight and Obesity Prevention Among Children and Adolescents. As part of this study, EPRI is conducting interviews to evaluate the results of specific programmes/policy actions at the country level. We have identified UNICEF's work in <country name> as a relevant sample for a case

study on ‘front-of-pack nutrition labelling’. For this reason, we are interested in getting information from key stakeholders willing to share their experiences and knowledge with us. We want to understand from your perspective, the work and contributions made by UNICEF on these case study topics and what they can do to further improve their work. Please note that there are no ‘right’ or ‘wrong’ answers. We would like to hear about your experiences and opinions so please feel free to share these with us as openly and honestly as possible. The interview will be one hour long.

**Consent for Recording and Use of Transcripts:**

In order to maximise the utilisation of insights generated during this interview, we would like to record the interview and use its transcripts for direct and indirect reference while drafting the reports. Kindly note that you will not be personally identified in any reporting of the findings. Your name will be mentioned only in the annex of the reports. The data from this interview will be kept confidential and will only be shared with EPRI team and relevant UNICEF members who are also bound by confidentiality requirements. Do you give consent to this interview being recorded?

**Consent for Participation:** Thank you for sharing your consent to record the interview. Now we would like to take your consent to participate in the interview. Please note that your participation is voluntary, and you may choose to not respond to any or all questions or may withdraw any time without consequences. Do you give your consent to participate in the interview?

Thank you for your consent to participate in the interview. If you have any queries or concerns after this interview, please contact Sonia Jose, senior researcher from EPRI at [sonia@epri.org.za](mailto:sonia@epri.org.za). In case you would like to direct the query to UNICEF, please reach out to Beth Ann Plowman, the Evaluation Manager at UNICEF EO at [baplowman@unicef.org](mailto:baplowman@unicef.org).

We would now like to start the interview by asking you a few questions. Please feel free to venture beyond the scope of our questions if you deem it necessary and useful. These questions are only guiding.

**Questions on UNICEF’s support for overall work on preventing childhood and adolescence overweight and obesity**

1. How has UNICEF generated or used quality evidence to inform government programme and policy work on preventing childhood and adolescence overweight and obesity?
2. In what ways has UNICEF been successful in elevating priority for childhood and adolescence overweight and obesity prevention as an issue in this country? (examples include integration into national development plans, health, or education policy, increase in funding, engagement of political champions, high level forums, media etc)
3. How has UNICEF contributed towards coordinating actions across government and non-government stakeholders to maximise impact on this issue? (for ex: convening stakeholder meetings, supporting building of alliances/steering committees etc.)
4. What areas of overweight and obesity prevention and management is UNICEF supporting the most in this country?
5. How do you view the effectiveness and feasibility of ‘increasing taxes on unhealthy foods and beverages’ as a policy action to prevent childhood and adolescence overweight and obesity? Is it a current priority for your organisation?
6. Which areas of overweight and obesity prevention and management could UNICEF do more to support in the future?

Based on initial desk review and interviews, we have identified <country name> as an important example to understand the work being done on the case study topic “front-of-pack nutrition labelling”. For the remainder of the interview, we would ask you to reflect on this main programme.

1. What are the key objectives of UNICEF’s policy action/programme? How will the policy action/programme contribute towards preventing childhood and adolescence overweight and obesity in the country?
2. How has UNICEF generated or used evidence to inform programme and policy work on this case study topic?

3. How has UNICEF supported the planning/design/implementation/M&E of this case study topic? What, if any, was UNICEF's unique contribution towards this work?
4. How has UNICEF worked with collaborating partners (like NGOs, other UN agencies) to advance efforts on the case study topic?
5. How has UNICEF ensured coherence of their work on the case study topic with the plans and priorities of yours and other organisations working on this issue?
6. How has UNICEF built capacities of other NGOs, UN agencies etc. to plan/design/implement the work on the case study topic?
7. How has UNICEF used their available financial and human resources efficiently in supporting the work on the case study topic?

#### Way forward:

1. What more can UNICEF do to support advancing the agenda on overweight and obesity prevention in the country? Are there any gaps in UNICEF's current support that could be further improved upon?

## Informed Consent: Online Survey

**Introduction:** This online survey is being shared with you to gather insights for UNICEF's current work and future plans for action on overweight and obesity prevention among children and adolescents. The survey aims to assess early-stage results of UNICEF's work in prevention of childhood overweight and obesity and identify factors that will help inform future work.

This survey can be taken by staff from COs/Multi-COs/National Committee Offices that:

1. Are working on overweight and obesity prevention among children and adolescents already

2. Have not yet started work on overweight and obesity prevention among children and adolescents

Based on your type of work (1 or 2), different sets of questions will be asked to you in this online survey. This survey should take approximately 15-25 minutes to complete. While the beginning sections may seem long, the later sections are much shorter and quicker to complete. If you need to break from filling the form, you can choose the 'edit later' option which will generate a new survey link with saved responses. You can choose the option to email this link to yourself for your easy reference later. Please open this new link later when convenient to resume filling the survey from where you left off. Note: Opening the old link again will cause loss of saved data.

We request you to please complete the survey as soon as possible, latest before the deadline- Friday, 22 September 2023.

In case of queries or concerns, please contact Sonia Jose, senior researcher from Economic Policy Research Institute at [sonia@epri.org.za](mailto:sonia@epri.org.za) or Beth Ann Plowman, the Evaluation Manager at UNICEF EO at [baplowman@unicef.org](mailto:baplowman@unicef.org)

Your response will be kept confidential, and you will not be identified when the survey findings are reported. Individual responses will not be shared with anyone outside EPRI and the UNICEF staff who are also bound by confidentiality requirements. Your participation is voluntary, and you may choose to not answer any or all questions or withdraw without consequences. However, your response is highly encouraged as it will help improve UNICEF's future work. Do you give your consent to participate?



**For further information, please contact:**

**UNICEF**

3 United Nations Plaza  
New York, NY 10017  
USA

© United Nations Children's Fund (UNICEF)

**December 2024**