

# How Media Helped Build the Case for Front-of-Package Warning Labels in Brazil



**QUANDO ABRIR A BOCA,  
NÃO FECHER OS OLHOS.**

**EXIJA OS ALERTAS  
DOS TRIÂNGULOS  
NOS ALIMENTOS.**

<b>ALTO EM SÓDIO</b> MIN. SAÚDE	<b>ALTO EM AÇÚCAR</b> MIN. SAÚDE	<b>ALTO EM GORDURAS SATURADAS</b> MIN. SAÚDE
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# Executive Summary

The rapid transition from traditional diets to diets high in ultra-processed foods and beverages has been responsible for a massive increase in obesity rates in Brazil.<sup>1</sup> Almost one in five Brazilians have been affected, with obesity rates up from 11.8% in 2006 to 19.8% in 2018.<sup>1</sup> Against this backdrop—and the corresponding rise in diabetes and heart disease burdening the nation's health systems—Brazil's Health Surveillance Agency (ANVISA) convened stakeholders from civil society and the food industry, among others, to be part of a working group to develop a new food labeling system. This initiative was carried out in response to the results of research by the Brazilian Institute of Consumer Rights (IDEC) highlighting consumers' needs for clearer information to help them make healthier food choices.

Since 2014, when the working group first met, the country's public health officials and civil society partners agreed upon the need for a system that informs the public and warns them about the health risks of processed foods high in salt, fat, and sugar. Yet how to fulfill that need was far less clear. ANVISA, which is an autonomous regulatory branch of Brazil's health ministry, navigated between civil society recommendations—which pressed for strong warning labels—and the food industry, which called for a less effective approach that stopped short of warning the public.

IDEC, in collaboration with partners from the Brazilian Alliance for Healthy and Adequate Food, a coalition of civil society groups, led a series of communication campaigns to promote effective front-of-package labels and maintain the momentum for ANVISA's initiative.

The partners' communication efforts paid off in October 2020, when ANVISA finally approved a model for front-of-package labels. Before that victory, however, IDEC's communication efforts, under the banner of the Alliance, paved the way for a successful public consultation to determine which packaging models would most likely lead to healthier eating habits. In order to drive consumers to the ANVISA website and urge them to participate in the 2019 public consultation, partners conducted targeted digital media campaigns, resulting in an unprecedented volume of responses, and, ultimately, the selection of a warning label model.

Vital Strategies, as part of the Bloomberg Philanthropies Food Policy Program, supported partners to develop these successful communication campaigns that were a critical component of the policy advocacy effort. This case study focuses on the strategies taken to engage public participation, which ultimately led to a positive outcome regarding this pressing public health issue.

<sup>1</sup> Surveillance of Risk Factors and Protection from Chronic Diseases by Telephone Survey (Vigitel)  
– Access: [vigil-brasil-2018.pdf](https://vigil-brasil-2018.pdf) ([saude.gov.br](https://saude.gov.br))

# A Timeline: From Concept to Public Consultation

**June 2014:** ANVISA summoned stakeholders from civil society and the food and beverage industry to be part of a nutrition labeling working group.

**September 2017:** As part of this working group, IDEC collaborated with the Federal University of Paraná to develop a proposal for front-of-package labeling with black warning triangles and the PAHO Nutrient Profile Model.

**October 2017:** After critical research comparing various front-of-package labels, IDEC presented the black triangle models to ANVISA, backed by the Brazilian Alliance for Healthy and Adequate Food.

**November 2017:** The Alliance launched a series of mass media and advocacy campaigns, called [“Right to Know,” which countered misleading information found on food products labels](#). In addition to campaigns targeting the broader public, partners mobilized support among policymakers and the scientific/medical communities for approval of front-of-package labels that included warnings.

**May 2018:** In response to partner advocacy campaigns, ANVISA decided to host a technical labeling consultation for experts to share their perceptions and expectations about proposed labeling regulation.

**July 2018:** Following the ANVISA technical consultation, the Alliance launched a new campaign calling for a public consultation to review the nutrition labeling regulation and to continue promoting the black triangle model.

**November 2018:** The Alliance launched a national media campaign with testimonials from doctors and patients, aiming to increase the sense of urgency for clear information to avoid unhealthy food choices.



Front-of-package label models ANVISA used as reference in the discussions and consultation. Source: IDEC

**October 2019:** ANVISA opened a public consultation about the revision of nutrition labeling regulation, and the Alliance launched digital campaigns to inform consumers and boost participation in the process. The consultation ended with a record 23,400 public contributions.

**September 2020:** The Alliance launched an advocacy campaign to put pressure on ANVISA to finalize its decision and encourage the best possible outcome for the front-of-package label regulations.

**October 2020:** ANVISA's Board of Directors announced the selection of the magnifying glass model, to be printed on food packaging labels. The new regulation comes into force October 2022, 24 months after publication.

# A Strategic Media Campaign to Promote the Public Consultation

This section highlights the details of the partners' media strategy— an intersection of digital media, traditional media and earned media. The communication campaign started in 2014 and the partners' communication efforts finally paid off in October 2020, when ANVISA finally approved a model for front-of-package labels featuring a magnifying glass with text to warn consumers about products high in sugar, saturated fat or sodium.

While research showed the magnifying glass had greater impact than some other proposed labels—including the traffic light model proposed by the food and beverage industry—partners still consider the black triangles model to be the one that would have the greatest impact on consumer behavior. Nonetheless, after seven years of consultations, the partners welcomed the adoption of this “high in...” label as a positive step and celebrated the communication campaigns that played a major role in this victory.

## How digital media was used to build the case for front-of-package labels

After several years of campaigning using traditional media to set the agenda and highlight the need for front-of-package warning labels for the Brazilian public, partners relied more on digital media during ANVISA's public consultation to stimulate participation and drive traffic to ANVISA's website, where the feedback process was hosted. The first step in the media strategy was identifying the audience.

### Understanding the audience

Since ANVISA's public consultations usually have a complex format that demand a certain level of education and expertise, partners agreed to focus on target audiences more likely to contribute, namely:

- a. Parents: middle to high socio-economic status and educational level (known in Brazil as “AB socioeconomic status”); male and female; 30-45 years old;
- b. Adults interested in health: health professionals; healthy people; those who search for health subjects online; middle to high socio-economic status and educational level (known in Brazil as “AB socioeconomic status”); male and female; 25-60 years old;
- c. Youth: young people engaged in social issues; middle to high socio-economic status and educational level (known in Brazil as “AB socioeconomic status”); male and female; 20-30 years old.



### Developing the concepts

Based on these target audiences, partners then commissioned a creative agency to develop three main concepts to test via digital media in live A/B testing, real-world research that allows one to test small variations in marketing materials to determine which is most effective with the target audience. The concepts reflected three different approaches:

- Concept A: Based on testimonials of real people showing negative health consequences of poor nutritional information, the main call to action was: “Everything could have been different if I had been warned before eating.”
- Concept B: Based on a common saying in Brazil, “open your mouth and close your eyes,” this concept revised the phrase into a warning: “When you open your mouth, don’t close your eyes.”
- Concept C: “Don’t swallow this” is another phrase commonly used in Brazil to motivate people not to accept things without questioning; in this case, the literal meaning of the phrase was implied—do not swallow processed food without knowing if it is unhealthy.



From left to right, concepts A, B, and C.

### Using target audiences to inform messaging

Among the main target audiences (parents, adults interested in health and youth), 600,000 people were selected according to their preferences, search history and interests; careful attention was paid to maintain equal representation among the audience groups.

The media users were then segmented into groups of 200,000, and then divided further into three subgroups, each containing 66,000 people. Each subgroup was shown one of the three concepts.

Half of each subgroup, approximately 33,000 people, saw the full concept (call to action and creative art), while the other half received just the call-to-action text with no accompanying art. This was done to isolate and measure the impact of the call to action.

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Each concept was evaluated by the number of impressions, views, clicks, visits to the campaign website and time spent viewing. Concept B, “When you open your mouth, don’t close your eyes,” achieved the highest number of impressions, showing its relevance to a broader audience, as well as the highest number of clicks and website visits across multiple pages, not only the homepage.

Concept B was therefore selected for the digital media campaign, and visuals were adapted according to the different target groups: health professionals and parents. The concept was also adapted to be used across several formats, including digital banners, social media posts and videos. The basic idea was to show a person whose eyes are covered by the hand of a man in a suit. This hand was intended to represent the food and beverage industry—the implication being that these corporations have a vested interest in preventing consumers from being aware of the health risks of products high in sugar, saturated fat and salt. The accompanying text reads: “When you open your mouth...” In the next frame, the eyes of the person are open and uncovered and the text reads: “Don’t close your eyes.” In the end frame, the call to action asks people to support the black triangles in the public consultation and to learn more at the Alliance [website](#).

All digital traffic was directed to the Alliance website, where people were instructed on how to participate in ANVISA’s public consultation and were asked to support the black triangle model. From there, a link took participants directly to ANVISA’s website. By driving people to the Alliance website, partners were able to monitor who clicked through to ANVISA webpage and who didn’t clicked.



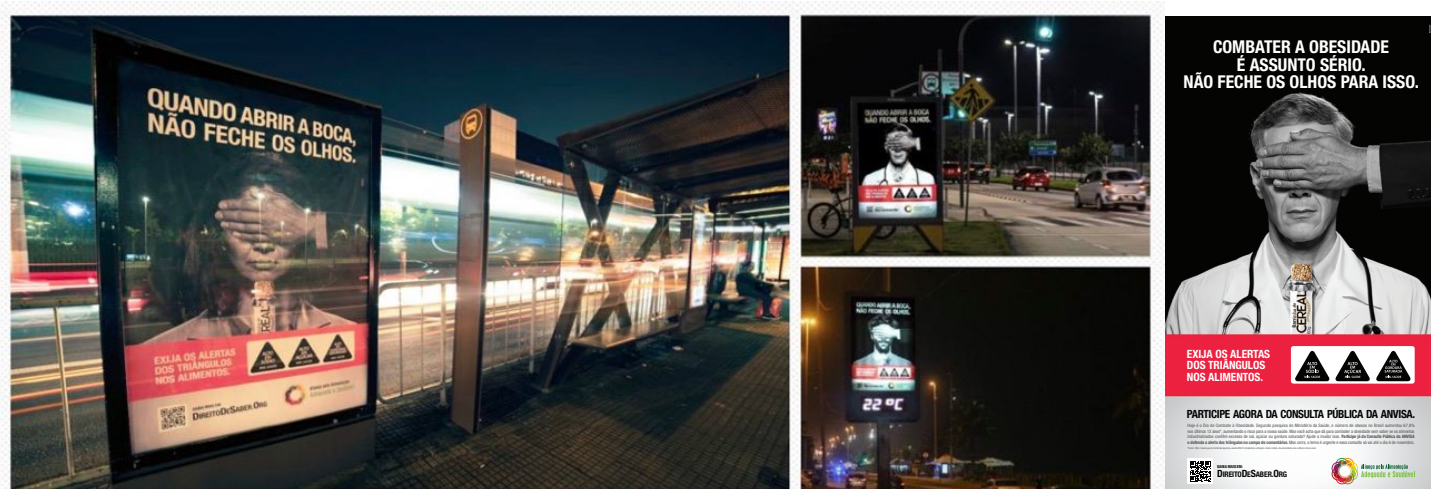
Visuals of the four frames of concept B. Source: Idec

### Critical components of the campaign

The campaign had three components:

- Focus on need for front-of-package labeling: Prior to the beginning of the consultation, partners used mainstream, offline and digital media to highlight the need for front-of-package labeling among decision-makers, and to prepare audiences for the upcoming consultation.
- Build online support: After the public consultation was launched, partners dramatically increased digital campaign visibility to maximize impact and build support for their proposed model for front-of-package labels.
- Optimize support for the public consultation: The ultimate goal of the campaign was to drive traffic to ANVISA's public consultation website to generate participation and support for the black triangles.

The goal of the offline media component was to raise the campaign's profile among decision-makers in critical cities—Rio de Janeiro, São Paulo and Brasília—and increase the decision-makers' receptivity to the campaign once it was launched on digital media. Offline media investments for this stage were therefore small.



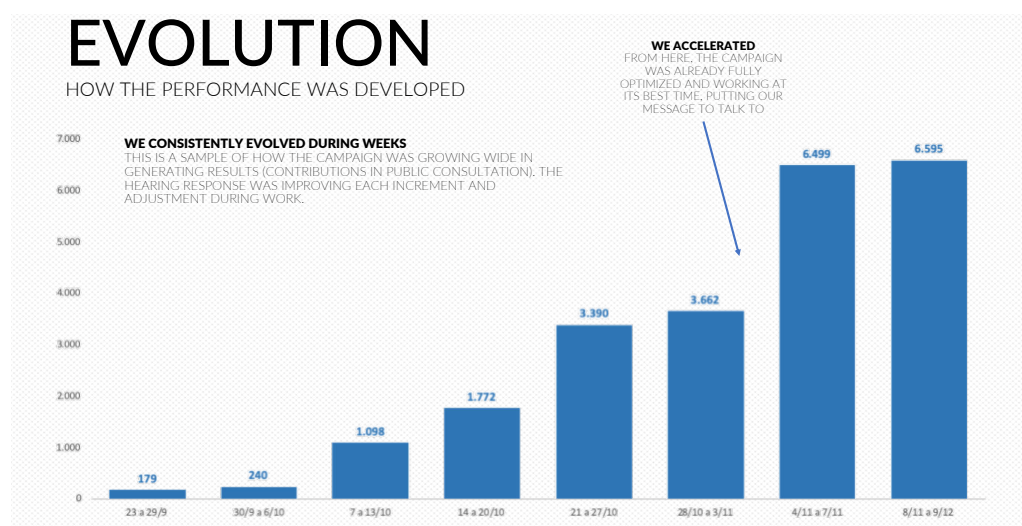
Newspaper and out-of-home components of the campaign. Source: Idec

### Building and optimizing support for the public consultation

#### DRIVING PUBLIC ENGAGEMENT VIA DIGITAL DISPLAY:

Once the public consultation was launched, campaign messaging focused mostly on driving public engagement and response via digital media: banners, search engines and social media (Instagram and Facebook). By employing precise segmentation to pinpoint audience, and digital media that was target-oriented using cookies, this approach allowed for rapid responses to the live results of the campaign.





Evolution of the campaign's performance. Source: Repense

### TAILORING MEDIA RESPONSE TO INDIVIDUAL AUDIENCE PROFILES:

Partners were able to understand which segments of the audience were responding, and to which materials on which media. Consequently, we could adjust the media strategy whenever a certain media was not performing as expected. For example, through monitoring we learned that investment on Facebook and Instagram was not as effective as investment in digital banners on media portals to achieve clicks through to ANVISA's consultation website. This discovery led to a shift in the strategy to ensure a better return on investment.

Using digital re-targeting tools, partners were able to identify those who responded to the campaign and clicked to access ANVISA's website to complete the consultation, as well as those who didn't click. Those who did not click to access ANVISA's website were targeted with additional campaign messages to increase the response rate.

As indicated in the graphic above, as the campaign strengthened its investment, the number of weekly contributions to the public consultation increased.

### Boosting the campaign through influencers and community actions

To lend extra credibility and generate more contributions supporting the black triangles, partners worked closely with influencers throughout the campaign period, fostering connections and briefing key journalists and influencers to boost campaign awareness. To reach diverse audiences, we approached public figures—such as celebrity chefs and actors—who were aligned with the cause. Many of these influencers shared the campaign on their social media platforms, which in turn boosted consultation participation.

For instance, celebrity chefs Bela Gil, Janaina Rueda, Rita Lobo and other important influencers shared the campaign material on social media. Rita Lobo streamed a live video with IDEC's Rafael Arantes one week before the close of the

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consultation, explaining how to fill in the ANVISA form. Other important influencers, including actors, celebrity doctors and news presenters, also posted about the consultation on their social media platforms.

Partners conducted community-level activities to boost the campaign's profile and generate media coverage. Two such actions involved campaign “tents” and a video mapping. The campaign tents were street actions that demonstrated to the public how the black triangle warning labels would appear on products, should they be approved by ANVISA. This made it easier for people to visualize what products high in salt, sugar and fat would look like. These tents, which were supported by local Alliance members, were held in public places with a great deal of pedestrian traffic in major cities across the country.



Campaign tent in the city of Salvador demonstrates how the black triangle warning labels would appear on products. Source: Idec

## Strategic Adjustments Made During the Campaign

### Real time concerns

Leading up to and throughout the course of the consultation, partners had to make some strategic adjustments to respond to concerns in real times. For example, when the partners were testing concepts among the target audiences, it became clear through metrics evaluation and discussions with technical and advocacy specialists that we needed to address the medical community as a separate group. A new specific target was created within the health audience, along with tailored creative messaging.



Video Mapping along a main street in São Paulo. Source: Idec

### Monitoring new bills

During the campaign period, six new bills on food labeling were presented in the National Congress. Partners continuously monitored these bills. While this process was highly influenced by the food industry, the introduction of new bills showed that the campaign had an impact on politicians; they wanted to demonstrate to their electoral base that they were engaged in a subject that had relevance in the national agenda.

### Preparing the public for a user-unfriendly website

Aware that ANVISA's website was not user-friendly, partners also created a [tutorial video](#) with step-by-step instructions on how to complete the consultation form; this was developed and shared extensively via partners' social media channels and on the "Right to Know" website. Partners also realized that more people were participating in the consultation through desktop or laptop computers. This was attributed to ANVISA's website being particularly hard to navigate via mobile phone, so the partners adjusted their investments accordingly.

### Timeline extensions

Another adjustment was made near the end of the public consultation after ANVISA decided to extend the deadline another 30 days. At that point, the partners felt that social media outlets were already saturated with messaging. Instead, partners decided to project a video on the side of a 30-foot building along São Paulo's main avenue, Avenida Paulista. The projection lasted three hours, playing a selection of campaign videos and reaching thousands of people who passed by during a busy weekday. It also generated more than 30 stories on national and local media.

## Conclusion

The campaign was able to set the public agenda for food labels, highlighting the lack of information available to consumers and the relationship between ultra-processed food and diseases; this messaging was expressed in the media, broadening the public's knowledge and participation in the consultation. Despite lobbying on the part of the food industry to prevent further legislation, new bills on food labeling were introduced in Congress during the campaign. This shows that policy makers were impacted by the campaign and wanted to demonstrate to their constituents that they were engaged in a subject relevant to the national agenda.

Although partners believe that the selected magnifying glass label is not as effective as the black triangle model proposed, we were pleased that ANVISA moved forward with the “high in...” front-of-package labels. Partners believe they played a significant role in this victory.

The collective effort that began in 2014 with the nutrition labeling working group achieved important results that demonstrate the success of a carefully thought out and tested campaign strategy.

The campaign achieved its aim of informing the public about the labeling process and getting them involved. As a result, Brazil witnessed an unprecedented number of contributions from individuals during the public consultation. The campaign was also able to persevere through adverse political conditions, such as a change in administrations at the federal level and in ANVISA's leadership. By shedding light on the labeling process conducted by the regulatory agency, the partners made it hard for the food and beverage industry to interfere in the process, as both government regulators and industry representatives were under scrutiny.

IDEC and Alliance partners managed not only to attract 27,400 people to its “Right to Know” website, but they were responsible for the majority of the 23,400 participants who completed ANVISA's public consultation—a national record. Notably, 63% of those contributions showed a preference for the Alliance's black triangle model. Other positive metrics of the campaign include:

- Campaign materials were seen 741.4 million times.
- 153 news stories were generated about the campaign, equivalent to approximately R\$2.2 million in earned media (around US\$ 550,000 at that period's currency exchange rate).
- Digital media has delivered 95% of the campaign results, that is, it was responsible for the vast majority of our website accesses and, therefore, contributions in the consultation.

Finally, while this case study focuses specifically on food labeling in Brazil, the media strategies used—in addition to the direct advocacy and public actions of partners—can be adapted for other public health campaigns that seek to generate public engagement and behavior change, whether the focus is on food policy, epidemic prevention or some other health issue.



## Annex – Links and Images

### MASS MEDIA CAMPAIGN ON FRONT OF PACKAGE LABELING 2017

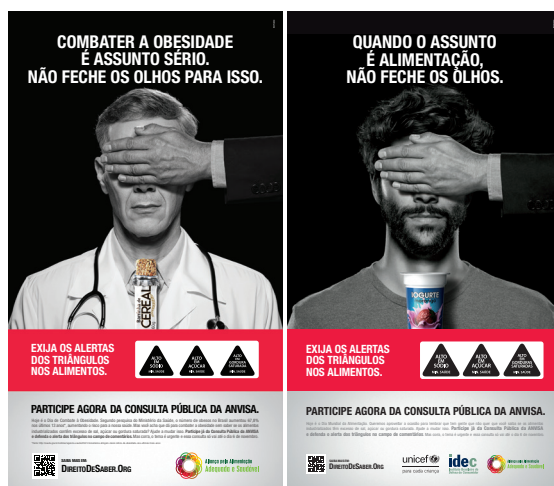
TV ad - <https://www.youtube.com/watch?v=To0k46n4Lqc>

### MASS MEDIA CAMPAIGN ON FRONT OF PACKAGE LABELING 2018

TV ads - <https://www.youtube.com/watch?v=qkYAMsFocwQ>, <https://www.youtube.com/watch?v=J9OcZJFvN50>

### MASS MEDIA CAMPAIGN ON FRONT OF PACKAGE LABELING 2019

Newspaper ad:



### MASS MEDIA CAMPAIGN ON FRONT OF PACKAGE LABELING 2020

Campaign microsite: <https://direitodesaber.org/>

Below three peanut candy fake packages with the three most important proposals in discussion in 2020:



Source: LabDsi - UFPR