DRAFT -2: 28 th October 2022 Subject: Draft Notification regarding Food Safety and Standards (Labelling & Display) Amendment Regulations, 2022 related to Front of Pack Nutritional Labelling (FOPNL) and High fat, sugar, salt (HFSS) etc.

FORMAT FOR SENDING THE COMMENTS AND SUGGESTIONS

S No.	Name and Address of the organisation/ person, contact number and E-mail	Relevant section in the draft notification on which comments are being provided	Comments/ suggestion	Rationale	Remarks
1	Association of Physicians of India (Malwa Branch), Kishori Ram Hospital Building, Kishori Ram Road, Basant Vihar Bathinda-151001, Punjab. 9417020903, vitullgupta2000@yahoo.com	Food Safety and Standards (Labelling & Display) Amendment Regulations, 2022. Section 2 and 14(1)	Public health is most important so FSSAI should consider 'Warning labels' instead of Front-of-Package Labels (FoPNL).	We feel that the regulation should helps in curbing unhealthy food consumption use warning signs to promote healthy foods. Several scientific studies in favour of 'Warning Label' as available as https://www.bpni.org/wpcontent/uploads/2022/03/EVIDENCE-OF-FOPL.pdf https://www.mdpi.com/2072-6643/14/15/3128 Nutrients 2022, 14(15), 3128; https://doi.org/10.3390/nu14153128).	Government has defined HFSS – foods high in fat, sugar and salt in draft, so it will be effective if food products are labelled according to risk factors warnings
2		Secion 1.(2) (2) They shall come into force on the date of their final publication in the Official Gazette. Compliance shall be voluntary until a period of 48 months from the	Implement the regulations in 12 months instead of 48 months.	Since many countries have implemented such regulations in less time and more over the regulations just not force change in production process but only display the warning labels so why it should be implemented in 48 months why not in 12 months.	Food industry can change such warning labels in a very short time if there is will to do.

		date of final notification of these regulations and mandatory thereafter			
3		14.(2).(b) (b) The INR system rates the overall nutritional profile for packaged food by assigning it a rating from ó star (least healthy) to 5 stars (healthiest). More stars indicate that the food product is better positioned to provide for daily human need of nutrients. The format of logo for INR is as indicated below:	Replace the INR Stars design by the designs to show the risk of food displaying warning labels for food High in Sugar, Energy , Sodium and or Saturated Fats.	Star design does not inform the true picture of healthy/ unhealthy food products and it very important to identify unhealthy foods by identifying food risk factors. Evidence exists to shows that warning labels can effectively alert people about unhealthy food products and thereby decreasing its consumption.	
4		Section 14(1) Para 3 Provided that any beverage/carbon ated beverage without energy and/or sugar	The statement that "unless these contain artificial sweeteners, stabilisers, emulsifiers or	Evidence shows that artificial sweeteners and other additives are linked to NCDs and make the food products as ultra-processed. BMJ 2022; 378 doi: https://doi.org/10.1136/bmj.o1972 (P ublished 31 August 2022)Cite this as:	Scientific evidence should be considered while developing the food policy of the country that will affect the health of whole population

		shall not be eligible for declaring Star Rating (INR).	taste/flavour enhancers or the likes" should be added to complete the sentence after declearing star ratinf (INR)	BMJ 2022;378:o1972 Consumption of ultra-processed foods and health outcomes: a systematic review of epidemiological studies Chen et al. Nutrition Journal (2020) 19:86 https://doi.org/10.1186/s12937-020-00604-1 Artificial sweeteners and cancer risk in a network of case–control studies S.Gallus1L.Scotti1E.Negri1R.Talamini2S.Franceschi3M.Monte lla4A.Giacosa5L.Dal Maso2C.La Vecchia16 https://doi.org/10.1093/annonc/mdl346	

Date:

The Chief Executive Officer (CEO)

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Sub: Front-of-pack labels on unhealthy food products

Sir,

IFSSAI has sought comments and suggestions regarding draft regulations on Front of the Package labeling for food products and I as health and human rights activist would like to suggest suggestions/objections on the Draft Amendment Regulation Labelling and Display.

Scientific data suggests that Non- communicable diseases like obesity, diabetes, hypertension, cancers, kidney and heart diseases are increasing and have become a serious public health problem affecting even the children. As health and human rights activist and researcher I am sure that increasing consumption of unhealthy food along with sedentary lifestyle are import risk factors, that is why government is seriously thinking of regulations on Front of the Package labeling for food products.

Important are ultra-processed foods like Regular soft drinks, sport drinks, sweet biscuits, breakfast cereals, chocolate, and savory and sweet biscuits, chips etc with very high in sugar/salt or fats.

I feel that Draft Amendment Regulation seems to me that giving "Stars" to junk food and brand these healthy is misleading for most of the common people and the public at large. This means that by adding fruits or nuts to foods with high fat, sugar, or salt foods (HFSS) and mostly unhealthy food will becomes healthy which is very misleading and flawed without any scientific basis. So 'star rating' will surely hide a number of dangerous effects of these unhealthy products and will surely convey the wrong message to the common people.

I think the best way to inform people about the unhealthy foods will be truthful and simple an alert or a warning label rather than misleading star ratings.

I think besides other objections, the STAR Ratings is most important to be scraped and a WARNING labels should be implemented that too within 12 months instead of 48 months.