THE COMMENTS AND SUGGESTIONSon the draft notification Food Safety and Standards (Labelling & Display) Amendment Regulations, 2022.

Sr. 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	*As below	1 (2) Compliance shall be voluntary until a period of 48 months from the date of final notification of these regulations and mandatory thereafter	Compliance shall be as soon as possible but mandatory within a period of 6 months from the date of final notification of these regulations	To change over to new packaging and labelling till the current stock exhausts from the sale rack and godowns, 6 months' time limit is more than necessary.	Voluntary stipulation will not work. 4 years initiation period for a new law is never heard of
2	*As below	Chapter 14 (2) (b) ….assigning it a rating from ½ 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.	Assigning it a rating from 0 or No star (least healthy) to 5 stars (healthiest).	In any rating or valuation, the scale applied is 0-to any positive value 5 or 10 or 100. Here the assumption of any least healthy food has "de facto" half Star eligibility does not sound logic.	
3	*As below	Chapter 14 (2) (b) …….food business operators may give optionally additional interpretive information as per serve percentage contribution to RDA of energy, total sugars, saturated fats and sodium expressed as salt equivalent, along with the INR logo	food business operators must give interpretive information as per serve percentage contribution to RDA of energy, total sugars, saturated fats and sodium expressed as salt equivalent	Text information of percentage contribution of minimum required food component per day for the money the Consumer spend is important to them. That information is quantified and simple. Star rating is a background computation whose steps and logic common citizen will not know.	No option to be given to FBO but a must to do.
4	*As below	4. Table1. under Schedule-III	Baseline Reference Values for Food Risk Factors	**Baseline Reference Values for Food Risk Factors are not consistent with WHO recommended values**.**	Why do we have higher values for

			needs to be brought down except for Fat.		Indian population?
5	*As below	Table 2,3,4,5,6 INR Baseline Points& Positive Points for FVNLM, Dietary fibre and Protien	Capping of positive points in INR in calculator has been derived on the principle that weightage of positive nutrients should not outweigh the negatives	Whole of this complicated calculation and algorithm has to be deleted from the HSR. A simple warning label on the HFSS status should replace HSR label. _One good feature cannot neutralise the fundamental and predominant negative feature of a product. In any Good Manufacturing Process (GMP) rating any negative feature detected leads to the rejection of the whole lot (Lot Quality Assessment). The aim of Nutrition labelling or HSR is to warn the consumer about the inherent danger in a packaged food by the regulator_.	_The regulator need not justify to consumer about the negative feature by showcasing the Positive points as a compensation. That is the responsibility of the marketing division of the FBO._
	*As below				

**Baseline Reference Values for Food Risk Factors FSSAI 2022 and WHO-SEARO(in parenthesis)

Food Risk Factors	Solid Foods	Liquid Foods
Energy,kcal	400 (230)	30
Total Sugars, gm	21 (6)	6(2)
Saturated Fat, gm	5 (8)	3
Sodium, mg	450 (250)	100 (300)

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