

NUTRITION ADVOCACY IN PUBLIC INTEREST-India (NAPi)

29th May 2023

To,
Dr. Mansukh Mandaviya
Union Minister
Ministry of Health and Family Welfare
Government of India
Nirman Bhawan, New Delhi-110011

SUB: Preventing NCDs: Bill to 1) harmonise Food Safety Regulations with the Consumer Protection Act 2019 and 2) objectively define “Healthy Food”.

Dear Sir,

We write as Nutrition Advocacy in Public Interest(NAPi), a national think tank on nutrition –consisting of independent experts in epidemiology, human nutrition, community nutrition and pediatrics, medical education, administration and management; having decades of experience in respective fields; and have come together to advocate on nutrition policy in public interest. NAPi was chaired by Late Sh. Keshav Desiraju.

India is witnessing a public health crisis of huge proportions. Obesity is increasing rapidly in India in children under -5. In adult men and women obesity increased by almost 25% during the past 5 years. This leads to the consequences of rising burden of non-communicable diseases (NCDs) and deaths in adulthood. It estimated that 5.8 million people die from NCDs every year and the proportion of deaths due to NCDs (among all deaths) increased from 37% in 1990 to 61% in 2016. In India 56% of children between 5 to 19 years of age showed cardio-metabolic risk factors.(CNNS-2016).

One of the main risk factors for the occurrence of obesity and NCDs is the increase in consumption of ultra-processed food products, which are characterised by industrial processing,cosmetic additives, flavouring and colouring agents, high sugar, fat and sodium content that are available as pre-packaged and aggressively marketed, which leads to decrease in consumption of minimally processed or fresh foods.

We would like to bring the following two critical issues to your kind attention to prevent NCDs: one to harmonise the Consumer Laws with Health Laws, and second to objectively define “Healthy Food”.

1. Why is harmonisation of Consumer Laws with Health Laws necessary?

The FSS Act 2006, states in Section 24. Restrictions of advertisement and prohibition as to unfair trade practices.- (1) No advertisement shall be made of any food which is misleading or deceiving or contravenes the provisions of this Act, the rules and regulations made there under.

The Central Consumer Protection Authority issued a notification on 9th June, 2022; for prevention of misleading advertisements. Section 8(1)(i) of which reads as “Children targeted advertisements. – (1) An advertisement that addresses or targets or uses children shall not – (i) “ feature personalities from the field of sports, music or cinema for products **which under any law requires a health warning for such advertisement or cannot be purchased by children**”.

Since both these regulations aim to prevent misleading advertisements, and therefore, NCDs, it would be appropriate to harmonise Health Laws with the Consumer Protection Act.

CONVENER

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2. Why is an objective definition of “healthy food” necessary?

Recent tweet from the Food Regulator itself projected *healthy Pearl Millet Chocolate Nuty Bars* to be ‘healthy’, which is hard to understand given its contents: millets, peanut butter, almonds, walnuts, cashew nuts oil, butter and dark chocolate (which incidentally is 80Gms. of the total weight of 180gms). Nutrition information showed it has 71 grams of carbs, 74 grams of fat, 17 grams of protein and energy value of 1022 kcal. Calculating per100 gms reveals it to be 567 kcal per 100 gms (Annex-1)

Tweet: “Try this healthy Pearl Millet Chocolate Nuty Bars to power your day”. (See Annex Pics)<https://twitter.com/fssaiindia/status/1657622712196694017?s=20> (accessed at 17.40 hours 15-05-23).

It is of deep concerns as this message comes from the Government’s food regulator. It calls for an objective definition, what is a “healthy food”? Furthermore, most of the advertised pre-packaged food products do claim it to be ‘healthy’ even as these contain unhealthy nutrients and cosmetic additives. The WHO’s recent guideline asks to avoid non-sugar sweeteners.

Therefore, a criteria to objectively define what is a “healthy food” is the need of the hour.

In conclusion, considering the necessity and urgency, NAPi requests MOHFW to bring up a Bill to address both these issues.

We will be happy to assist. Needless to say this step will go a long way in preventing the risk of NCDs.

With our kind regards,

Sincerely yours,

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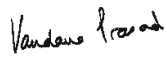
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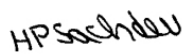
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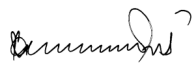
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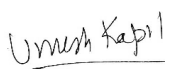
Dr. J.P. Dadhich
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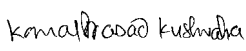
Ms. Nupur Bidla
Social Worker

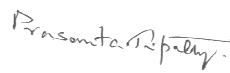

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Cc for advance copy for necessary and appropriate action
Shri. Rajesh Bhushan, Secretary Health and Chairperson FSSAI
Shri. Shri. S Gopalakrishnan, Special Secretary, MoHFW
Shri Vishal Chauhan, Joint Secretary MOHFW (NCDs)
CEO, FSSAI
Chairperson Consumer Protection Authority

Annex-1



For you

Following

↻ ↺ Poshan Abhiyaan Retweeted



FSSAI @fssaiindia · 19h



Try this healthy Pearl Millet Chocolate Nutty Bars to power up your day.

[#RecipeRavivaar](#)

[#PearlMillets](#)

[#IYM2023](#)

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RecipeRavivaar

PEARL MILLET CHOCOLATE NUTTY BARS

NUTRITION VALUES

Energy	1022 Kcal
Protein	7 Gram
Fat	72 Gram
Carbohydrate	71 Gram

Ingredients

- Pearl Millet Flour- 25 g
- Almonds- 10 g
- Peanut Butter- 25 g
- Cashew Nuts- 10 g
- Walnuts-10 g
- Oil- 10 ml
- Butter- 10 g
- Dark Chocolate- 80 g

Instruction

- Melt the dark chocolate; to this add peanut butter, pearl millet flour, oil and mix thoroughly.
- Now bake almonds, cashew and walnuts in butter for 10 minutes at 150 °C.
- Let the nuts cool and crush them coarsely.
- Take a tray lined with butter paper, pour the chocolate mix, and decorate with coarse nuts.
- Freeze the above mixture in refrigerator for 15 minutes and cut into bar shape.
- Enjoy the sweet nutty bar.



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#RecipeRavivaar

PEARL MILLET CHOCOLATE NUTTY BARS

SWIPE LEFT

to see the recipe

NUTRITION VALUES

Energy	1022 Kcal
Protein	17 Gram
Fat	74 Gram
Carbohydrate	71 Gram

Source- NVIF, 1989; IFCT 2017



Source: Millets International Recipes; Nutrihub, ICAR - IIMR, MoAFW

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Pearl Millet Chocolate Nutty Bars

 For 4 persons  10 minute  40 minute

Ingredients

- Pearl Millet Flour- 25 g
- Almonds- 10 g
- Peanut Butter- 25 g
- Cashew Nuts- 10 g
- Walnuts-10 g
- Oil- 10 ml
- Butter- 10 g
- Dark Chocolate- 80 g

Instruction

- Melt the dark chocolate; to this add peanut butter, pearl millet flour, oil and mix thoroughly.
- Now bake almonds, cashew and walnuts in butter for 10 minutes at 150 °C.
- Let the nuts cool and crush them coarsely. • Take a tray lined with butter paper, pour the chocolate mix, and decorate with coarse nuts.
- Freeze the above mixture in refrigerator for 15 minutes and cut into bar shape.
- Enjoy the sweet nutty bar.



Source: Millets International Recipes; Nutrihub, ICAR -IIMR, MoAFW

INGREDIENTS:

SUGAR, COCOA SOLIDS, COCOA BUTTER,
PERMITTED EMULSIFIERS (E322, E476).
CONTAINS ADDED FLAVOURS (ARTIFICIAL
FLAVOURING SUBSTANCES - COCOA & VANILLA).

NUTRITIONAL INFORMATION*

Amount per 100 g

Energy, kcal	557
Total Fat, g	33.7
Saturated Fat, g	20.4
Trans Fat, g	0
Total Carbohydrate, g	57.3
Added Sugar, g	43.0
Protein, g	6.0

*Approx. values