

November 9, 2022

The Chief Executive Officer (CEO)
Food Safety and Standards Authority of India
FDA Bhawan
Kotla Road, New Delhi: 110 002
Email: regulation@fssai.gov.in
CC: ceo@fssai.gov.in

Sub: Objection and Suggestion regarding Official FoPNL gazette Draft notification.

Sir,

I write on behalf of the Obesity Surgery Society of India (OSSI) which is committed towards reducing obesity, diabetes and metabolic disorders in the Indian population.

In India, the prevalence of both diabetes and obesity is increasing. Despite the fact that pre-packaged food goods are unhealthy and bad for one's health over time, the marketing and health claims made by big businesses on their products tend to persuade consumers to buy them.

We recently read the FSSAI's draft notification on food labelling and display, and I would like to express my objection with it as well as a suggestion.

We object to the section 14. (2). (b) which says -

(b) The INR system rates the overall nutritional profile for packaged food by 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. The format of logo for INR is as indicated below:

Regulation, in our opinion, should emphasise "High fat, sugar, and salt (HFSS) food." In order to have a healthy life, consumer must be able to focus on diets based on fresh or minimally processed meals, so it is critical to identify unhealthy food products based on what is high/excessive. Increasing public knowledge can help people consume less of those unhealthy pre-packaged food items, which in turn helps to reduce childhood obesity and improve circumstances for adult illnesses including heart disease, diabetes, and hypertension. Therefore, the front of the package label must draw greater attention to the high/excessive content of the food product in order to educate and empower the general public to select a product that is excellent for their health. Star ratings are therefore should not be favoured; warning labels should.

The inclusion of WHO cut-offs for the food risk factors coupled with warning labels is therefore a preferable choice than star ratings. Furthermore, we object to adding a few pieces of fruit etc into unhealthy food and then marketing it as food that contains actual fruits,

We would like to thank the FSSAI for giving this opportunity to express any concern or suggestion on this draft notification.

Thanking you,

Yours sincerely,

Dr Arun Prasad,
Former President – Obesity Surgery Society of India and authorised representative
India