

Subject: Notification regarding Food Safety and Standards (Labelling & Display) Amendment Regulations, 2022 related to Front of Pack Nutritionla Labelling (FOPNL) and Hugh fat, sugar, salt, (HFSS) etc

COMMENTS AND SUGGESTIONS

S r. N o	Name, Address of the organisation/per son and contact details	Relevant section in the draft notification on which comments are provided	Comment/ suggestion	Rationale	Remarks
1	Kidney Warriors Foundation, Mrs Vasundhara Raghavan, 704, Casa Marina, Hiranandani Estate, Ghodbundar Road, Thane (W) 400607 Tel # 9867030954 Vasundhara.rag havan@gmail.c om	Section1, sub- section 2 The clause suggests that regulation will come into force on the date of the final publication of the Official Gazette. Complaiance shall be voluntary until a period of 48 months of the final notification of these	Shorter period for complaiance	<p>Traditionally Indian food has been centered around healthy practises. With high rise in incidence of non-communicable diseases we need to review food consumption patterns and understand the root cause of problems. The exercise on FOPNL is to correct consumption of foods by kids and youth as a health protection measure.</p> <p>Giving a long time lag to bring the reguation into force will mean more new products will flood the market without time for proper assessment of risks to which people will be exposed. Kindly give a shorter timeframe to bring the regulation into force.</p> <p>Any delay in getting our industry and public to recognise the dangers of HFSS will become a calamity for India.</p>	<p>Decisions on food that has direct impact on health needs to be an educated decision as even the producers families will be impacted over time.</p> <p>Tighter time frames must be considered.</p>

		regulations.			
2		Please refer to -the Section 2 and 14 (1) in Food Safety and Standards (Labelling & Display) Amendment Regulations, 2022	In keeping focus on public health, we need to accept Warning Labels as explained	<p>Common people will understand well displayed“Warning Labels” that will clearly show them foods that should not be consumed due to HIGH FATS, SUGAR and SALT content. The warnings must help them to decide on right foods to consume and must NOT be vague and open for any misrepresentation of facts. High consumption of foods with high salt, sugar and fats could put our population at risk and cause irrevocable damage to their health and impact all the family members.</p> <p>It becomes our dutyto warn public against consumption of UPFs. Appropriate implementation of rules based on scientific information and tested methods used in other countries should be guiding us.</p> <p>India’s additional challenge is higher population without medical insurance and public healthcare. Families will be destroyed due to rise of chronic diseases.</p> <p>For consistency, the definition must be standardised for easy understanding.</p>	<p>From FSSAI’s definition – HFSS it is clear that certain foods will put people at risk.</p> <p>This may be clearly mentioned without ANY ambiguity. Kindly maintain a simple and easy to understand explanation.</p>

