



Indian Academy of Pediatrics

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Date: Nov 10th 2022

To,
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: Front-of-pack labels on unhealthy food products.

Sir,

Greetings from Indian Academy of Pediatrics!

We learn that the FSSAI has sought comments regarding its proposed regulations on Front of the Package labeling for food products. In this regard, we would like to subscribe to the following statements in response to invited comments (suggestions/objections) on the Draft Amendment Regulation Labelling and Display:

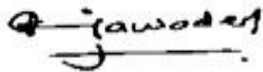
1. As reported, India is facing a public health crisis of so-called Non- communicable diseases like obesity, diabetes, hypertension, cancers, kidney and heart diseases. It is said to begin as early as 5 years of age. Our thoughts go out to our near and dear ones whom we have lost early. Our thoughts go out to the future of our children.
2. One of the key reasons for this situation is the increased consumption of pre-packaged food products also known as ultra-processed foods. These products are such as Regular soft drinks, sport drinks, sweet biscuits, breakfast cereals, chocolate, and savory and sweet biscuits, chips etc. These are usually high in sugar/salt or fats.
3. FSSAI has put up a draft notification in this direction and invited public comments, which is a welcome step. A Front of package labeling of foods (FOPL) should be implemented at the earliest so that consumers can make an informed choice. It is also perceivable that vested interests might try to delay the notification due to their commercial interests.
4. However, The Amendment Regulation as of now may be a little misleading for the public at large as it plans to give “Stars” to junk food and call these healthy. This is even though the regulation has defined high fat, sugar, or salt foods (HFSS) as, if a product contains total sugar or saturated fat that provides more than 10% of total calories is considered High; as per WHO guidelines. These cut-offs may be used for FOPL.
5. The concept that unhealthy food becomes healthy by adding fruits or nuts is flawed and has no basis in science. The Stars are assigned by a complex scoring system, that values positive factors such as fruit or nuts. This ‘star rating’ might mask many deleterious effects of these products and might convey the wrong message to the public.

6. In the best interest of public health, it would be appropriate for the FSSAI to inform people about which foods are high in food risk factors going by its definition and drop the idea of a star rating. An alert or a warning label is due where it is due to prevent the spread of these socially communicated diseases by curtailing consumption of such foods mentioned above. This would be simple and truthful.
7. Also, the FSSAI proposal to allow 4 years to comply with the regulation is too liberal and should have been 6-12 months at the most given the urgency of action to reduce the consumption of unhealthy junk food products.

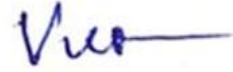
We seek your indulgence in factoring in public health over the commercial interests of a few. This is the least I can do in the interest of the health of India.



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President, IAP 2022



Dr Upendra Kinjawadekar
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