



Indian Association of Preventive & Social Medicine

Founded in 1974

(Registered Under Societies Act XXI of 1860 in 1984, New Delhi, Registration No. 14240)

National President

Dr. Harivansh Chopra

Secretary General

Dr. Purushottam Giri

President Elect

Dr. A. M. Kadri

Immediate Past President

Dr. Suneela Garg

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Dr. Parul Sharma

Dr. Ankit M. Sheth

No. IAPSM/GC/2022/10

Date: - 10/11/ 2022

To,
The Chief Executive Officer (CEO)
Food Safety and Standards Authority of India
FDA Bhawan
Kotla Road, New Delhi: 110 002

Sub: Concerns and suggestions regarding the official FoPNL Gazette:

Sir,

The Indian Association of Preventive and Social Medicine (IAPSM), founded in 1974, is a National level Professional body in the field of Community Medicine/Public health. It is a "not for profit" organization of Preventive & Social Medicine/ Community Medicine/Public Health specialists. The IAPSM works with the vision of contributing to the overall development of country by improving the health of people through collective wisdom of its members.

Pre-packaged and junk food consumption is increasing more swiftly now. Having kids at home, we know how difficult it is to get them to eat a balanced diet.

We recently read the Amendment Regulation on Food Labelling and want to propose our concerns and recommendations in response to what the FSSAI is requesting. We express our discontent with the following section, which was included in the notification published in the Official Gazette:

Section 1. (2) (2) "They shall come into force on the date of their final publication in the Official Gazette. Compliance shall be voluntary until a period of 48 months from the date of final notification of these regulations and mandatory thereafter".

1. This indicates that adherence is initially voluntary and then becomes obligatory after 48 months from the date of the regulations' final publication. On the other hand, we contend that the government need to move swiftly to change the labelling.

If this does not happen than there is a possibility that the many food industries would take undue advantage of this. Precisely, just the labels need to be updated keeping the production procedure unaffected.



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2. It is unacceptable to assign a star rating to unhealthy foods. Also, there are many health concerns associated with eating ultra-processed food products. Following are the most recent evidences for your kind perusal:

A. Premature Deaths attributable to the Consumption of Ultra processed Foods in Brazil concludes:

"The consumption of ultra-processed foods represents a significant cause of premature death in Brazil. Reducing ultra-processed food intake would promote substantial health gains for the population and should be a food policy priority to reduce premature mortality".

Am J Prev Med 2022;000(000):1-8. © 2022 American Journal of Preventive Medicine.

[https://www.ajpmonline.org/article/S0749-3797\(22\)00429-9/pdf](https://www.ajpmonline.org/article/S0749-3797(22)00429-9/pdf)

B. Ultra-processed food consumption and type 2 diabetes incidence: A prospective cohort study.

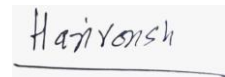
The study to show prospective association between high UPF intake at baseline and T2Diabetes risk. This time in Quebec, Ca (40-69 y-old, 7y follow-up, HR 1.47; 1.07-2.03). Higher risk for the co-occurrence of high UPF and depression (HR 1.62; 1.02-2.57) Authors concluded: Our findings demonstrate that a diet high in UPFs is associated with a clinically important increased risk of T2D. Identifying and implementing effective public health actions to reduce UPF consumption in the UK and globally are urgently required.

<https://pubmed.ncbi.nlm.nih.gov/33388205/>

As a response, we suggest that FSSAI should concentrate on alerting consumers to such health concerns and provide them with information about foods that are high in sugar, salt, or saturated fats in accordance with the WHO dietary intake recommendations for preventing non-communicable diseases.

<https://www.who.int/news-room/fact-sheets/detail/healthy-diet>

Once again, we would like to thank FSSAI for giving us the opportunity to voice our concerns about this proposed notification.



Dr. Harivansh Chopra
President IAPSM



Dr. Purushottam Giri
Secretary General

