

NUTRITION ADVOCACY IN PUBLIC INTEREST-India (NAPi)

November 7, 2022

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

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Dear Sir,

Greetings from Nutrition Advocacy in Public Interest (NAPi)

Ref. to PMOPG/D/2022/0081191 dated 12.04.2022: (Annex-1) and the Draft Notification regarding Food Safety and Standards (Labelling & Display) Amendment Regulations, 2022 related to Front of Pack Nutritional Labelling (FOPNL) and High fat, sugar, salt (HFSS) etc.

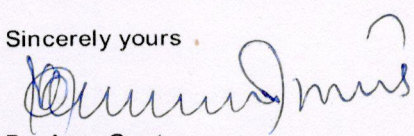
In addition to our earlier submission in the above mentioned letter, NAPi is pleased to submit comments and suggestions on the draft notification along with substantiating evidence/studies on the same as desired. Attached is a document with detailed Para wise comments for your kind consideration. (Annex-2 NAPi Comments.docx.) In a nutshell, NAPi makes the following recommendations from its comments:

1. FSSAI has identified the definition of High Fat/Salt/Sugar Foods (HFSS) and health risk increasing food factors i.e. energy, sugar, sodium and saturated fats. This is a commendable step. The regulation may be constructed around these factors without complicating with a scoring system and assignment of 'Stars'. This means describing which food is HIGH IN any one or more risk factors. It would also make it easy for the FSSAI to communicate effectively what is it that people should reduce from their diets as well. Not only it will tremendously benefit the population of India to understand what to avoid, It would also impact the rising non-communicable diseases the fact that is a core element for having such a policy.
2. Reference value of Food risk factors may be used from WHO guidelines of SEARO and PAHO regions.
3. Delete any reference to positive nutrients or factors as these don't stand any scientific test to reduce the unhealthiness of a pre-packaged food product.
4. FoPNL may be made mandatory after 12 months (maximum) of its notification.
5. Israel example may also be used to define 'healthy food' and provide green label. Criteria may be developed independently. The Israel model of governance of food labelling may be studied and adapted for India as it removes the bias and conflicts of Interest.

NAPi would be happy to clarify and discuss any of the issues mentioned in the letter and comments attached.

Looking forward to a favourable response to a public health policy,

Sincerely yours


Dr. Arun Gupta
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