

Annex

Sr. No	Name and Address of the organisation/person contact number, E-mail	Relevant section in the draft notification on which comments are being provided	Comments/suggestion	Rationale	Remarks
1	Organised Medicine Academic Guild – OMAG , Dr Ishwar Gilada 9820081566 gilada@usa.net	Section 1 (2) Compliance shall be voluntary until a period of 48 months from the date of final notification of these regulations and mandatory thereafter	<u>OMAG recommends</u> that regulation compliance be done as soon as possible within a period of 1 year. It works only if it is mandatory	There is no need to wait for 4 years to allow increasing non-communicable diseases. And change in labelling does not need more than 6-12 months' time .	Voluntary regulations don't work any where in the world.
2		Section 2.(1) (ib) Definition of HFSS: "High fat, sugar, salt (HFSS) food means a processed food product which has high levels of saturated Fat or total sugar or sodium. The declared values of these ingredients are such that the product; does not satisfy the value of energy (kcal) from total sugar less than 10 percent of total energy, or from saturated fat 10 percent of total.	<u>Please use this</u> definition for defining which foods are healthy or unhealthy, high in any of the unwanted nutrients. This information may be put up right up in the Front of the pack.(FOPL)	This will be a true expression of the contents of the food product , which may be high in any of the nutrients of concern. WHO guidelines are reflected accurately here to prevent NCDs.	In the present form the regulation may be misleading for the citizens to see "Stars" on junk food and call these healthy, therefore unlikely to reduce consumption.
3.		Section 14(1) Para 2 , 4 th line onwards: The baseline reference values for food risk factors and minimum percentage of positive factors; INR baseline points for Category-I; INR baseline points for Category-II; capping of positive points; formula to calculate star rating and associated interpretation are provided in Table 1, 2, 3, 4, 5 & 6 of Schedule- III, respectively. The list of solid foods/liquid foods under Category-III (exempted from FOPNL) are provided in Schedule-IV."	There is no need to calculate star rating based on positive nutrients as science does not support this. Simple proposition as above may be taken up to inform people about HFSS foods through FOPL .	This suggestion is in harmony with the definition of HFSS and WHO guidance for Population Nutrient Intake to prevent NCDs.	One of the key reasons for NCDs is increased consumption of pre-packaged food products, (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.