

# Inception Meeting cum Roundtable on **Elimination of Trans-Fats in India**

**30** July 2019  
New Delhi

## Event Report



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## Background and Overview

Since June 2018, CUTS International is partnering with Global Health Advocacy Incubator (GHAi) to mobilise key stakeholders and to support the efforts of Food Safety and Standards Authority of India (FSSAI) to eliminate trans-fats from India. The main objectives of the Inception Meeting-cum-Roundtable, therefore, was to get limited key stakeholders who are instrumental in policymaking to discuss and deliberate on opportunities, gaps and challenges in relation to trans-fats' elimination from India.

The roundtable was organised to set up a platform and initiate a national campaign where all the stakeholders come together and work hand-in-hand with FSSAI and Ministry of Health to form a common action plan to work together and completely eliminate trans-fats from India even before 2022. The meeting was facilitated using participatory approaches: statements by invited guests, presentations, discussions, brainstorming and question sessions. It provided ample time for attendees to contribute to the discussions and the issues presented.

The report summarises the statements of the participants and presentations and the general proceedings of the meetings. The agenda of this event, the list of attendees, Charter of Demands by consumer organisations and the poster released to kick-start the national campaign can be found in the Appendix.

## Proceedings

The meeting started on time and participants self-introduced themselves and shared their expectations of the Inception-cum-Roundtable Meeting. This was followed by the welcome address, statements and presentations from some key meeting representatives.

### Welcome Address



**George Cheriyan**, Director, CUTS International, welcomed the meeting attendees and key speakers and gave brief introductory remarks. He stated the objectives of the meeting and recounted memories of how CUTS has been a pioneer in food safety regulatory initiative developed. After talking about the purpose of this Inception-cum- Small Roundtable on “Elimination of Trans-fat from India”, he declared that through this meeting it officially kick-starts the national campaign to support Food Safety and Standards Authority of India (FSSAI) and work hand-in-hand in achieving the target of

eliminating trans-fats from India even before 2022. He underlined that the main focus of this half-day discussion and deliberation would be on the opportunities, gaps and challenges in achieving the 2022 target.

Later, touching upon a little bit of background to underline the importance of the initiative, George highlighted the increasing burden and threat of non-communicable diseases (NCDs). NCDs constitute a major public health challenge that undermines social and economic development of India. India is experiencing a growing burden of NCDs claiming over 5.87 million lives in a year. The probability of dying between the ages of 30 – 70 because of NCDs is as high as 26 percent. Estimates show that there are almost 64 million people with cardiovascular diseases (CVD), 39 million people with chronic respiratory diseases and 69 million people with diabetes in India and the presence of trans-fats in bakery products and food cooked in vanaspati oils is one of the major factor of such an increase, particularly in CVD. While tobacco and alcohol are popularly advertised as evil goods with high taxes and warning labels, unhealthy food products high in trans-fats have attracted little attention for their irreversible harmful effects on health.

Looking into other country practices, he opined that it was only Denmark that pioneered the banning of industrially produced trans-fats in food in 2003, by introducing a law limiting the amount of trans-fat to 2 grams per 100 grams of fat or oil. Soon many other countries followed. World Health Organisation (WHO) also released in May 2018 REPLACE, a step-by-step guide for the elimination of industrially produced trans-fatty acids from global food supply by 2023.

Looking at national level, he stated that the FSSAI has been the torch bearer in promoting food safety in India. The authority has gradually regulated the trans-fats standards in the country by implementing a mandatory limit of 10 percent trans-fat content in oil/fats in 2013, which was then reduced to 5 percent in 2017. Reference was also made to the recently proposed amendments in Food Safety and Standards (Food Products Standards and Food Additives) Regulations, 2011, where targets have been set to reduce trans-fats to 2 percent by weight by 2022.

While citing the active role of FSSAI, George also expressed a few concerns regarding the lack of will to implement at the State level. While the 5 percent limit was active from 2017, as of now, the country does not have any data on its compliance and is still in the process of testing products to see if the industry has adhered to the regulation. Moreover, in a federal structure, like in most other sectors, national regulators are powerless and do not have the police powers. The implementation is with the States. Therefore, until and unless the States have the political will to implement nothing much can be achieved. He also pointed out that, other than the absence of States willingness to

implement, the lack of infrastructure, testing labs, technology, trained individuals, etc., are acting as a hindrance.

Before concluding, George also raised the concerns of the industry. Most companies are apprehensive to implement the colour coding for foods and drinks as 90 percent of heritage drinks and traditional foods like rasagullas will be red-labelled, if implemented, and that would create unnecessary panic, etc. Also, regarding elimination of trans-fats, companies and bakery industry is asking for a cost-effective viable alternative.

## Presentation

### Science of Tans-fats, Health Effects, Alternatives and Regulator Aspects

**Dr. Ahamed Ibrahim** delivered the presentation on Science of Tans-fats, Health Effects, Alternatives and Regulator Aspects. He began his presentation with defining trans-fatty acids and identifying their sources. Partially hydrogenated vegetable oils (PHVO) are the major source of trans-fatty acids which are industrially produced, while it is also found naturally in meat and dairy



products. He also pointed out that while trans-fatty acids are also formed due to thermal treatments of vegetable oils like refining, deodorization, cooking and frying, the actual amount of trans-fatty acids in them are very less. He highlight that saturated fatty acid does not affect HDL and is considered harmful and artificial trans-fatty acids, which are hydrogenated vegetable oils, have serious health consequences as it significantly affects the ratio of the LDL and the HDL levels in the blood.

To highlight the risk associated with consuming industrially produced trans-fatty acids, Ibrahim relied on a few of the recent research studies. He pointed out how studies show that a 2-percent increase in intake of trans-fatty acids is associated with 23 percent increase in relative risk of coronary heart diseases (CHD). Meta analysis also show that the intake of industrially produced trans-fatty acids, but not ruminant-trans fatty acids, is positively associated with all causes of mortality, total CHD and CHD mortality. He further opined that New York City is the first city to completely ban trans-fats in 2007 and studies clearly confirm that the ban resulted in 6.2 percent decline in hospital admission for heart attacks and strokes. Besides, compared to saturated fatty acids, industrially produced trans-fatty acids also decrease insulin sensitivity to a greater extent and a pregnant lady consuming industrially produced trans-fatty acids even 1 percent predispose the offspring to insulin resistance in adult life, thereby suggesting



the importance of restricting the intake of trans-fat during pregnancy and lactation. Also, chronic intake of industrially produced trans-fatty acids induced progression of non-alcoholic fatty liver disease (NAFLD).

Focusing on regulation of trans-fats, Ibrahim states that Vanaspati accounts for 10 percent total production of vegetable oils and is used mainly as the substitute for ghee. The trans-fatty acid content of Vanaspati before regulations was somewhere between 10-40 percent. WHO recommends that total TFA intake be limited to less than 1 percent of total energy intake, which translates to less than 2.2 g/day in a 2,000-calorie diet and suggested global phasing out of trans-fats. On these lines, in June 2015, the United States Food and Drug Administration (USFDA) made a final decision to remove the “generally recognized as safe” (GRAS) status from partially hydrogenated oils in the United States, which essentially acts as a countrywide TFA ban.

In India, national consultation on trans-fat regulation was held at National Institute of Nutrition (NIN) on 29th January 2010. The discussion during this consultation resulted in fixing the limit of trans-fatty acids in Vanaspati or partially hydrogenated oils at 10 percent, to be brought down to five percent in three years. Now, the FSSAI proposes to reduce the trans-fat to 2 percent by 2022.

Before concluding, Ibrahim also suggested alternatives for the trans-fatty acids. He primarily suggested using interesterified fats – a type of oil where the fatty acids have been moved from one triglyceride molecule to another. According to studies, trans-fat, but not interesterified fat, significantly raises harmful LDL cholesterol. Another alternative he suggested is that the industry can also use tropical oils like palm oil, palm kernel oil and coconut oil as the replacement of partially hydrogenated vegetable oils. Also, alternatives like the use of trait-enhanced oils that are produced by genetic engineering, like high oleic acid sunflower oil and canola oil, for deep frying are best.

### **Global Perspectives and Practices on Trans-Fatty Acids**



Vandana Shah, Regional Director, GHAI, began by giving a brief overview of her organisation and their work area. In terms of World Health Organisation (WHO) policy recommendation, WHO really prioritises the issue of elimination of trans-fats and thereby released the REPLACE action package. For India, it is very important to move towards the 2 percent but

enforcement is a challenge. Many states are lagging behind in enforcement, except a few like Kerala that began to show some progress. Enforcement powers being with the food safety commissioners of the States, nothing much can be achieved unless States take initiatives.

As seen, most of the trans-fats policies are largely implemented in developed world and as developing countries now begin to look at eliminating trans-fat, the REPLACE package is a great framework action that the countries can rely upon. As a part of this package, there are two options, either strict limits that cap the percentage of industrially produced trans-fatty acids across all foods or complete ban of partially hydrogenated oils. In case of India, legally binding trans-fatty acids limit is most suitable rather than a complete ban of partially hydrogenated oil, as it can be tested at all levels from oils to food. She also underlined the need for having supportive policies like labelling, as it helps consumers to make an informed choice. Labelling also allows monitoring of industry compliance with legally binding trans-fatty acids limits, as well as tracking of trans-fatty acids levels before and after regulations are implemented.

She also highlighted the concern and the need for unique capacity to test trans-fatty acids which are significantly absent in most states. There are no sufficient accredited labs to carry out tests. There is a need to develop some sort of roadmap to address this before moving forward. Another challenge is with regards to low income populations who can be left vulnerable. She also said that, when there are lot of producers in the market, it is hard to regulate from the top of the food chains. It can be regulated if we have a trans-fatty acids limit. So, these reasons point out that, for India, trans-fat limit type of policy is the best.

In terms of partially hydrogenated oil ban that is present in smaller group of countries, it targets only the oil supply and it does not ban foods. This can be particularly advantageous for countries that have a limited number of processing plants, by making implementation and enforcement of the ban more manageable and highly cost-effective. If partially hydrogenated oil containing products are mostly domestic in origin, the process of partial hydrogenation can probably be easily identified and regulated by designated inspectors at processing plants.

Therefore, focusing on 2 percent limit, she pointed that five examples relevant to India are Denmark, Argentina, Slovenia, Europe and South Africa. Understanding the overall experience and challenges faced by these countries can be of much significance while implementing the national policy, though each country has its own unique and conducive environment. Likewise, she also quoted three examples for partial hydrogenated oil ban – Thailand, United States of America and Canada.

Before concluding, she highlighted that a major advocacy point at FSSAI is that the proposed legislation that extends to 2 percent of oils and fats does not extend to foods and this needs to be pushed. All stakeholders need to come forward and take a common stand regarding this. Another important area is that, in India, informal markets are quite large in number that have informal sources of oils, street vendors, bakeries, restaurants and so hopefully the state machineries need to be well-equipped to test even such smaller outlets.

## Open Discussion



After concluding the presentations, an open discussion between the participants and the panel experts was held. During this discussion, participants also got a chance to share their views as well as to clear their doubts with the panel experts.

Questions were raised regarding the health impact of the alternatives like palm oil and high oleic acid oils suggested by him at the end of his presentation. Responding to these queries, Ibrahim stated that palm oil, or any vegetable, oil when consumed as part of a balanced diet, does not have incremental risk for cardiovascular disease. In fact, the whole controversy surrounding palm oil is due to related environmental hazards in the process of cultivation and a subsequent EU ban of import of palm oils to be used as biofuels.

Questions to **Vandana Shah** were regarding the hesitance to adopting policy supporting PHO ban in India when there are only 150 plus manufacturers of PHO. The reason stated by Shah and Ibrahim for this was the presence of huge number of unorganised manufacturers in this sector.



During these discussions, **Dr. Meenu Singh**, Consultant (Nutrition), FSSAI, said that the regulation of 2 percent on all fats and oil by 2022 is about to be finalised and the legal department is in the process of finalising the drafts which would later be sent to the Ministry for final approval. Regarding the front-of-package label (FoPL) regulation, Singh claimed that the draft is currently open for public comments, whereas the draft of trans-fat in foods regulation is ready and would soon be released for public comments.

Regarding the trans-fat-free logo that was released a week before, she explained that the logo 'trans-fat free' can be used provided the food establishments use trans-fat free fats oils and do not have industrial trans-fat more than 0.2 gram per 100 gram of the food. However, participants were apprehensive about the effective implementation of this logo, due to the inability of most accredited labs to test trans-fats that require sophisticated facilities.

On these lines, **George** recalled a scheme that was announced few years back that supported the modernisation of state-owned labs by FSSAI for which 75 percent of the total fund were provided by FSSAI. In spite of this, many of the states have not submitted the proposal, like in Rajasthan which has 6 food-testing labs that are in very pathetic condition and not even NABL accredited. This lack of interest by the states is a major roadblock in ensuring food safety. Adding to this, **Saroja**, Director, Citizen Action Group, claimed that Tamil Nadu is currently in the process of upgrading its labs and for the same almost INR 20 million has been received from FSSAI.

**Ashim Sanyal, COO, Consumer Voice**, applauded the latest initiative by FSSAI which enables the states with a lack of NABL accredited labs to send samples for testing to private labs and the cost of the testing will be paid by FSSAI directly.

During the discussions, participants also expressed concern regarding the limited awareness among the food inspectors in India. While these inspectors are well aware about food adulteration and relevant issues, most of them lacked knowledge on nutritional components. If not addressed, this ignorance can pose a greater threat to the effective implementation of the 2022 target. Also, participants were apprehensive regarding the absence of any provision in the regulations regarding punitive action when requirement like 5 percent are not met by the manufacturers. They stressed that this needs to be put forward in the advocacy along with the 2-percent request. The current trend is more generic in nature and not specific.

According to WHO perspective, until and unless FSSAI comes up with the regulation nothing concrete can happen. WHO cannot pressurise a government but can only provide technical support and assistance to the nation to adopt and implement a policy.

## Presentation of 'Charter of Consumer Demands' & National Campaign



In a bid to make food safer and healthier, organisations such as CUTS International, Citizen Consumer and Civic Action Group (CAG), Consumer VOICE, Generation Saviour Association (GSA) and DISHA Foundation, presented an eight-point Charter of Demands to the Food Safety and Standards Authority of India (FSSAI). **George Cheriyan**, formally presented the **Charter of Consumer Demands** to **Dr. Meenu Singh, Consultant, FSSAI**.

As read out by **Akansha Choudhary**, Program Associate, CUTS International, this Charter highlighted immediate steps to be taken for elimination of trans-fats from the Indian food system by 2022 and specifically demanded for earliest notification of regulations with 2% limit of trans-fats for oils, fats and all food products. The Charter also demands an earliest notification of Food Safety and Standards (Labelling and Display) Regulations, 2019. It also requests making the current regulation of 5-percent limit measurable with regular surveillance tests and ensure transparency in implementation process by making testing data at national and state level available in the public domain.

The Charter of demands submitted also includes the need for strict implementation at state level, including setting-up of required infrastructure mechanisms (labs, technicians, etc.), institutional mechanisms, mandatory assessment report, sensitisation and capacity building of State Food Commissioners and Food Safety Officers on implementation of Trans-Fats regulations. The organisations announced that they will

be working as a coalition to create nation-wide awareness and demand for healthier and safer foods free of trans-fats.

National campaign was then kick-started through a poster release to support FSSAI and work hand-in-hand in achieving the target of eliminating trans-fats from India even before 2022.

### **Vote of Thanks**

**Madhu Sudan Sharma**, Senior Programme Officer, CUTS International, provided a quick overview of the various issues discussed at the event. He expressed his gratitude on behalf of the organisation to all the eminent guests, speakers and participants for making the event a success.

It is expected that the outcomes of this meeting will motivate all stakeholders to collectively work harder in a more consented, integrated and coordinated manner to achieve the 2022 target.

### Charter of Consumer Demands on Behalf of Consumer Organisations



## Eliminate Trans-fats from India

### Charter of Consumer Demands

1. Immediate notification of Food Safety and Standards (Food Product Standards and Additives) Regulations, 2011 with amendments made for trans fats limits on fats and oils.
2. Amendment of Food Safety and Standards (Food Product Standards and Additives) Regulations, 2011 to include 2% limit on trans fats for fats, oils and “all food products”.
3. Earliest notification of Food Safety and Standards (Labelling and Display) Regulations, 2019.
4. Make the current regulation of 5% limit measurable with regular surveillance tests and ensure transparency in implementation process by making testing data (5%, 3% and 2% limit) at national and state level available in the public domain.
5. New logo for Trans Fat Free (2%) products and restriction on misleading 'No Trans Fats' claims on packaged food products.
6. Strict monitoring of marketing methods and advertisements of packaged food items with all kinds of misleading claims.
7. Strict implementation at state level including setting up of required infrastructure mechanisms (labs, technicians etc.), institutional mechanisms and mandatory assessment reports.
8. Sensitisation and capacity building of State Food Commissioners and Food Safety Officers on implementation of Trans Fats regulations.

*On behalf of Consumer Organisations of India*  
CUTS International

D-217, Bhaskar Marg, Bani Park, Jaipur-302016, India | Ph: +91.141.2282821, Fx: +91.141.2282485, Email: [cart@cuts.org](mailto:cart@cuts.org)



Poster Released to Kick-start National Campaign



**TRANS-FAT  
FREE  
INDIA**

**CUTS<sup>®</sup>**  
International

**Consumer Unity & Trust Society**  
D-217, Bhaskar Marg, Bani Park, Jaipur 302 016, India  
Ph: +91.141.228 2821, Fx: +91.141.228 2733  
Email: [cart@cuts.org](mailto:cart@cuts.org), [www.cuts-international.org](http://www.cuts-international.org)



### List of Participants

S.No.	Name	Organisation's Name and Address
1.	Ashim Sanyal	Consumer Voice, New Delhi
2.	Arshdeep Singh	Generation Saviour Association
3.	Lopa Ghosh	CTFK- GHAI
4.	Ms. Nirupama Sharma	Infant and Young Children Nutrition Council of India, New Delhi
5.	Om Prakash Bera	CTFK- GHAI
6.	Roopa Shivshankar	RESOLVE TO SAVE LIVES, Haryana India
7.	Dr. S. Ahamed Ibrahim	NIN, Hyderabad
8.	Dr Suparna Ghosh	Public Health Foundation of India (PHFI)
9.	S. Saroja	Consumer Advisory and Outreach Citizen consumer and civic Action Group (CAG)
10.	Dr. Subhojit Dey	Disha Foundation
11.	Vandana Shah	CTFK- GHAI
12.	Simi TB	CUTS International
13.	George Cheriyan	CUTS International
14.	Madhu Sudan Sharma	CUTS International
15.	Aakansha Choudhary	CUTS International
16.	Satyapal Singh	CUTS International
17.	Vijay Singh	DRC, Delhi
18.	Ram Saran	DRC, Delhi
19.	Gaurav Gupta	CTFK, Delhi
20.	Ms. Rachita Gupta	WHO
21.	Sagri Negi	RTSL, Vital Strategies
22.	Dr. Meenu Singh	FSSAI, New Delhi

## Programme Schedule of the Event

10.30-11 AM	<b>Registration, Tea &amp; Informal Interactions</b>	
11-11:15AM	Welcome & Opening Remarks	<b>George Cheriyan</b> Director, CUTS International
	Global Perspectives and Practices on Trans-Fatty Acids(TFAs) (15 mins)	<b>Vandana Shah</b> Regional Director, GHAI
	Science of Trans-fats, Health Effects, Alternatives and Regulatory Aspects (15 mins)	<b>Dr. Ahamed Ibrahim</b> Scientist F & Head, Lipid Chemistry Division, National Institute of Nutrition(NIN) Member, Oils & Fats Scientific Panel, FSSAI
	Policy Status and Progress in India- Initiatives by Government of India	<b>Dr. Meenu Singh</b> Consultant , (Nutrition) Food Safety & Standards Authority of India(FSSAI)
	<ul style="list-style-type: none"> <li>Harmful Effects of Trans-fat Consumption</li> <li>Perspective from Industry- Initiatives to achieve 2022 deadline.</li> <li>Concerns, Suggestions and Way Forward</li> </ul>	<b>Health Experts</b>  <b>Industry Representatives</b>  <b>All Stakeholders</b>
	Presentation of Charter of Consumer Demands on behalf of Consumer Organisations	CUTS International
	Trans-fat free India	
	Summing Up and Vote of Thanks	<b>Madhu Sudan Sharma</b> , Senior Programme Officer, CUTS International
1:30PM onwards	<b>Lunch</b>	