

National Consultation on
**Food Labelling Regulations
for Safe and Healthy Food**



**August 17, 2018
New Delhi**

Background

Health and nutrition are the fundamental aspects of a healthy life. It is often said that health builds a relationship between soul and body. But with the changing scenario, this relationship is being interfered by the degrading eating habits and obliviousness of the people. The industrially produced trans-fatty acids (TFAs) resulting in cardiovascular disease (CVD), is responsible for more than 500,000 deaths per year globally.¹ Sadly, India is known for its highest heart patient mortality rates and Indians experiences heart attacks 8-10 years earlier than others,² which calls for an immediate attention to look into responsible reasons.

It is predicted that India will be burdened with approximately 25 percent of cardiovascular-related deaths and would serve as a home to more than 50 percent of the patients with heart ailments worldwide by 2023³. One of the major reasons for this is high prevalence of trans-fats and High Fat, Salt and Sugar (HFSS) in the form of easily available *Vanaspati* oil; reuse of oil for frying; baked and fried street food; food at, restaurants; and packed food in stores.

In 2015, Food Safety and Standards Authority of India (FSSAI) revised the limits of trans-fatty acids to be not more than five percent in the vegetable fat/oil, margarine and fat spreads and hydrogenated vegetable oils with deadline of compliance till 2017. In May, 2018, the World Health Organisation (WHO) released Review, Promote, Legislate, Assess, Create and Enforce (REPLACE), a step-by-step guide for the elimination of industrially-produced trans-fatty acids from the global food supply by 2023 as the first global initiative to eliminate a risk factor for CVD. Diets high in trans-fat increase heart risk by 21 percent and deaths by 28 percent.⁴

Very recently, the food industry has adopted a strategic approach of tagging packed food items like biscuits, wafers, cookies and other snacks as 'Trans-fat free' or 'Zero trans-fat'. Promoting these HFSS food items as healthier options without trans-fats is a deceptive approach. The harmful impacts of high content of fats, sugar and salt do not get proper attention of consumers to make informed choice in this business marketing. All these factors not just highlight the gravity of the subject but also call for an inclusive approach to fight the menace of HFSS and trans-fats in our food.

¹ <http://www.who.int/nutrition/topics/replace-transfat>

² <https://fit.thequint.com/health-news/trans-fat-ban-in-food-who>

³ Gupta, R., Joshi, P., Mohan, V., Reddy, K. S., & Yusuf, S. (2008). Epidemiology and causation of coronary heart disease and stroke in India. *Heart*, 94(1), 16-26.

⁴ <http://www.who.int/news-room/detail/14-05-2018-who-plan-to-eliminate-industrially-produced-trans-fatty-acids-from-global-food-supply>

Food Safety and Standards (Labelling and Display) Regulations, 2018

The FSSAI under the Ministry of Health and Family Welfare, Government of India is the concerned single reference point body acting as a regulator for food related issues in India. FSSAI has time and again given considerable importance to subject through 2015 order limiting trans-fats to five percent in certain oils by 2017 and further committing to reduce the same to two percent by 2022.

Recently, FSSAI has come out with India's first Draft Food Safety and Standards (Labelling and Display) Regulations, 2018 which significantly improves on the present gaps when it comes to helping consumers to make an informed choice on what products they wish to consume. In a significant move, the new regulation requires food high in sodium, sugar and fat to carry front-of-package warning labels.

While the move to bring in a regulation on labelling and display is very much appreciated, there are many issues and concerns related to the Draft Food Safety and Standards (Labelling & Display) Regulations 2018, which can be further improved. If done properly, this regulation can have a major, long-term impact both in encouraging industry reformulation and in changing food norms.

FSSAI has already offered a fair opportunity to relevant stakeholders to participate in framing a strong set of regulations in the best interest of all through submission of objections or suggestions. Some of these suggestions coming from a totally exclusive set of stakeholders might be overlapping or in total contradiction to each other.

National Consultation

Consumer Unity and Trust Society (CUTS International) is working in the area of food safety since its beginning to safeguard the interest of common consumers. CUTS also represents the voice of common consumers in the Central Advisory Committee of FSSAI, being its member. CUTS has already submitted its comments on the draft regulation



after gathering the best practices and experts' views from health professionals from leading public health universities across the globe.

To bring all the relevant stakeholders on a common platform, CUTS in partnership with FSSAI organised a National Consultation on August 17, 2018 in Delhi. The Consultation aimed to ignite a constructive discussion where everybody gets a chance to express their thoughts on the proposed draft regulations to understand the relevant issues from everyone's perspective and get to a consensus, which will definitely contribute in strengthening the draft Food Safety and Standards (Labelling and Display) Regulations, 2018 for greater welfare of common consumers in India. Various representatives from the government, industry, civil society organisations (CSOs), and public health experts came to a single platform and discussed the relevant issues, challenges and opportunities to move forward in this regard.

Proceedings

Inaugural Session

George Cheriyan, Director CUTS International, started the proceedings for the day remembering former Prime Minister of India, Shri Atal Bihari Vajpayee who passed away on August 16, 2018 and extended condolence to the departed soul. He welcomed all the participants from the government, industries, consumer organisations and other CSOs, public health experts and representatives from medical fraternity and the media.



Cheriyan said there is an increasing concern about the quality and safety of food being consumed. Collectively, Non-Communicable Disease (NCD) result in 70 percent of deaths globally and out of this cardiovascular disease is the major cause of death in all regions. According to WHO, in 2015, 17.7mn people died due to CVD which is 31 percent of the total global fatalities. Also, as per Global Burden of

Disease Report (2017), 1.7 million people died due to CVD in 2016 making it highest in the world with heart disease mortality.

He also highlighted that by 2023, it is estimated that 25 percent of total of heart related deaths and 50 percent of CVD will be India. The diet with HFSS and trans-fats is one the major risk factors in CVD. Diets high in trans-fat increase heart risks by 21 percent and deaths by 28 percent. Several initiatives were taken in the past to tackle the issue of HFSS and Trans-fat comprising: In 2015, FSSAI revised the limits of TFAs to be not more than five percent in the vegetable fat/oil, margarine and fat spreads and hydrogenated vegetable oil with deadline of compliance till 2017.

In May, 2018 WHO released REPLACE (Review, Promote, Legislate, Assess, Create and Enforce), a step-by-step guide for the elimination of industrially-produced TFAs from the global food supply by 2023 as the first global initiative to eliminate a risk factor for CVD. However, going one step ahead, FSSAI came with Food Standards & Safety (Labelling and Display) Regulations, 2018 aiming to reduce HFSS and eliminate trans-fats (upper limit of 2 percent) by 2022 itself i.e., a year before the WHO target.

One key aspect of these regulations is Front of Package (FoP) labels to help consumers make healthy informed choice. There are several examples across the world where Nordic countries are using Keyhole Labels, Iran with Apple Tree Model, and Traffic Light labels etc. He said, one needs to take into consideration several factors like regional diversity, literacy levels, simplicity etc. to come up with labels suitable for India. Denmark introduced elimination of trans-fats in 2003 itself resulting in drastic reduction in CVD cases followed by New York in 2008.

Cheriyian highlighted the main purpose of the Consultation where all the stakeholders from all sectors were brought together to discuss jointly on the draft regulations and comparing it to previous several such attempts which were sector-specific. He also expressed gratitude to FSSAI for partnering with CUTS for the Consultation and briefed the audience about CUTS and its work.

Pawan Agarwal, Secretary to Government of India and CEO, FSSAI started his keynote address paying respect and homage to former Prime Minister –Vajpayee. He further stated that in the past two and half years, an agenda high on agenda for FSSAI was ‘Food Labelling’. One thing FSSAI has been successful is work on building consensus but with these regulations, consensus has been evading. People need to know about what they are eating but no manufacturer intends to label a product which gives negative impact about the same. Awareness building which could have followed after release of draft regulations in April 2018 is initiated but much still needs to be done. Impact of labelling on choice of consumers has different perspective as per different studies.



There is broad consensus that there should be some kind of marking on the front side packing to inform consumers whether the food is healthy or not so healthy or whether one should have food in moderation, occasionally or regularly. The issue of labelling and threshold which will define whether the food is to be taken moderately has to be determined some day or the other. He said that there is no

aspiration to build complete consensus and FSSAI will go ahead with regulations and examine how it works on ground as already three years have passed discussing the theme. FSSAI is open to little bit of tweaking here and there but without compromising the basic direction of regulations. Having regards to large scale concerns by different stakeholders, Agarwal announced that for the time being, the regulations will be kept on hold and an expert panel from nutrition and health sector will be established to look at the entire issue of labelling again.

Industry does not want the food to be labelled as 'Red' which represent danger and some other concerns, so the expert group will inform FSSAI about concerns and best available options. The expert group will be headed by Dr. Sesikaran, Former Director, National Institute of Nutrition (NIN) along with Dr. Hemlatha, Director, NIN; and Dr. Nikhil Tandon, HoD, Department of Endocrinology, All India Institute of Medical Sciences (AIIMS). All the stakeholders present in the consultation, and particularly industry should articulate and bring forward the concerns and views to the panel as early as possible. He said, it is high time to move forward and finalise the regulations as this issue is holding on some other regulations like regulations for Schools which regulate what should be allowed to be sold in campus.

Thus, by nudging citizens to eat will not only promote healthy lifestyle, but will also save a huge cost being spent on upkeep of public health. He said India has done something unique from the perspective of fighting NCD through dietary choices by looking at the issue from both supply side and demand side. Through *Eat Right Movement*, FSSAI has persuaded large number businesses to make voluntary commitments making India the only developing country to do so. The food industry, manufacturers, hotel industry and edible oil industry have also started being proactive. Agarwal said, now a monitoring system will also be put in place to push industry to reduce HFSS in food products from the supply side itself. On the demand, *AajSeThodaKam* has been launched where FSSAI is working with IMA with aspiration to rope in doctors who have very important impact on citizens when it comes to choice of food.



Rajeev Kumar, Director (NCD), Ministry of Health and Family Welfare, Government of India, started his special address by pointing at Goal 3 of Sustainable Development Goals (SDG) which talks about reducing common NCDs by 25 percent by 2025 but the prevalence of mortality due to these diseases is increasing. He stressed how the chronic disease like Cancer, Diabetes and Hypertension is leading the burden of diseases in India. "Cancer kills 7 lakh people per year,

there is around 7.1 crore diabetic population and one out of five Indians suffer from Hypertension”. The main issue is about behaviour and when it comes to use of high salt, sugar and fat, people adapt to change in taste if they start practicing the same. The government is doing its part to address the issues through regulatory interventions like Cigarette and Other Tobacco Product Act (COTPA), initiatives by the Ministry of Sports and Youth Affairs to promote active population, and very recently by *Ayushman Bharat* endeavour.

According to a study, India is going to lose roughly about US\$4.5tn in between 2012-2030 because of chronic disease, making it more urgent to move at fast pace. He expressed happiness that industry has come up with voluntary pledge to reduce HFSS as this is an important subject where all the stakeholders have to join and work together. At the same time, there are stakeholders who are left out in voluntary pledges and there is where the role of these regulations by FSSAI plays a very important role. FoP can address the issue of capacity building of consumers in an effective way as they can understand what they are eating and opt for healthier choices.

Technical Session-I: Food Safety and Standards (Labelling & Display) Regulations

Dr. Satish Kulkarni, Former Head, National Dairy Research Institute, Bengaluru chaired the first technical session for the day. There were three presentations on the themes: Food Safety and Standards (Labelling and Display) Regulations, 2018; Strengthening Labelling Regulations: Consumer Perspective; and International Best Practices on Labelling and Display.



1. Food Safety and Standard (Labelling & Display) Regulations, 2018



Kumar Anil, Advisor (Standards), FSSAI, provided a brief and informative presentation on highlights of proposed draft regulations. The existing Packing and Labelling Regulations, 2011 were revised and split into three parts: Draft Packaging Regulations, Draft Advertisement and Claims Regulations and third one being, Draft Labelling Regulations. The major changes and

proposed inclusions in the labelling regulations are given as following:

- i. Nutritional information at Back of Pack with mandatory declaration of: Saturated fat (gm), transfat (gm) and cholesterol (mg); salt (gm) per served percent contribution of nutrients to Recommended Dietary Allowance (RDA) and number of servings per pack and per serving size
- ii. Mandatory declaration of Energy, total fat, total sugar and salt along with their percentage calculation to RDA on Front of Pack Label
- iii. For HFSS Food, food label shall be considered RED if: Energy (kcal) from total sugar is more than 10 percent of energy provided by the 100gm/100ml of the product; Energy (kcal) from trans-fat is more than one percent of energy provided by the 100g/100ml of the product; and Total fat and sodium content: more than the threshold values as specified in Schedule – I of regulations
- iv. Other than this, Allergen information, declaration of vegetarian, non-vegetarian and food not meant for human consumption, and mandatory expiry date shall also be mentioned on labels
- v. Regulations also take into consideration prepared food served for immediate consumption in hotels for minimum display of information. In addition , there are separate logos by FSSAI for fortified and organic food

2. Strengthening Labelling Regulations: Consumer Perspective



Aakansha Choudhary, Programme Associate, CUTS International made a brief presentation on suggestions and recommendations that can be included in final regulations to strengthen the Labelling Regulations. A compiled set of these recommendations prepared by CUTS International along with 28 global experts from well-known universities was submitted by CUTS to FSSAI in June 2018.

Some of the suggestions proposed to strengthen the regulations from the perspective of consumers are:

- i. Simple, interpretive labels that incorporate uncomplicated formats, warning labels and icons that best facilitate consumer comprehension and discrimination between healthy and less healthy products.
- ii. Warning labels should be required for products containing any level of artificial trans-fats.
- iii. Discontinued use of serving size which is arbitrary and does not contribute to standardisation that inculcates nutritional awareness among consumers.
- iv. Use of the RDAs or GDAs which are difficult to interpret should not be part of this proposal.
- v. Rigorous testing of labels and the various design features of the FOP component of the proposal should be ensured before finalisation.
- vi. Labelling paradigm should apply broadly to all food items that contribute materially to sodium (and other nutrients of concern) consumption. The exempted products should be as minimum as possible.
- vii. In designation of some foods with red labels, other colors (yellow and green) should not be added. Avoid “traffic light” model.
- viii. In case where packaged foods are sold in stores, and not ‘served’, will the message on healthy eating be displayed?
- ix. Provide details of contents wherever possible.

3. International Best Practices on Labelling and Display

Vandana Shah, Director of South Asia Programmes for the Campaign for Tobacco Free Kids presented on behalf of Professor Barry M Popkin, University of North Carolina and strongly proposed for Warning Labels. She explained how dozens of random controlled studies have compared FoP labels with other approaches and found a much greater impact from the warning label than from other approaches. The retail food

sector in India is still small but it is growing very rapidly with estimates of 18-35 percent annual growth. Buying of the most unhealthy non-essential foods and beverages is increasingly found among the poor in India and is used by about 33 percent of mothers to feed their infants.



Shah talked about various models of FoP Labelling in different countries like: Chile, Peru/Ecuador, Colombia and Brazil having Warning Labels with clear warning to refrain consumers from buying unhealthy products; Traffic lights model which is voluntary in many countries and acceptable to industry but not considered as effective and positive for consumers; and countries Nordic region, Belgium, Czech

Republic, Poland, Thailand, Singapore and Australia with positive logos looking at which consumers can pick healthy products.

The highlight of the presentation for global best practice was Chilean Law where mandatory labelling on unhealthy food is required. The 'Stop sign' label covers 10 percent of the surface of the package and number of labels/seals is proportional to number of high critical nutrients i.e., sugar, saturated fat, sodium, or calories. If all four are present above threshold value than four labels/seals adjacent to each other are displayed on the food package implying food with no or less seals are recommended. Shah also recommended the GDAs are not an effective tool and are hardest to understand and least effective in helping consumers make healthy choices.

Open Discussion

Dr. Satish Kulkarni, Chair for the session thanked all the panellists for their presentations and open the session for discussion and queries from participants. Following were the main issues of discussion:

- Concerns were raised about use of words like Nutri, Healthy, Natural, real, etc. without warning labels which gives a wrong impression about the safety of the product.
- FoP labels have worked well for Tobacco products. But complicated labels for Food products can be a jargon for people. Food labelling and tobacco labels are a totally different as any level of tobacco is dangerous to health but all food products are not dangerous.
- Genetically Modified (GM) Food Labelling Status: as of now there are no regulations but are in process.
- Low Gluten and Gluten Free Foods: What does Low Gluten mean? Only labelling for Gluten Free is incorporated in the regulations.
- Display of only relevant information: Regulators need to focus on safety so companies should rationalise information on labels and make it clutter free.

Technical Session-II: Eliminating Trans Fats and Reducing HFSS – Concerns and the Way Forward

The second technical session of the national consultation was dedicated to the topic 'Eliminating Trans Fats and Reducing HFSS: Concerns and the Way Forward' where perspectives of different stakeholders were presented. The session was chaired by Dr. N Bhaskar, Advisor (QA), FSSAI. The lead speakers in the session were: Raj Kapoor, Managing Director, Assocom Institute of Bakery Technology & Management (AIBTM), Dr. Nikhil Tandon, HoD, AIIMS; Amit Khurana, Programme Director, Centre for Science & Environment (CSE); Kanchan Zutshi, Secretary, Federation of Biscuit Manufacturers

of India (FBMI); and Dr. G M Subba Rao, Scientist-E, Deputy Director, National Institute of India (ICMR), MoHFW, Government of India.



Raj Kapoor, Managing Director, AIBTM made a presentation on Bakery Industry in India, focussing particularly on the status of the Trans Fats in the market. Bakery is a largest food processing industry and second largest revenue generating industry in India. He said that US FDA has already mandated to remove Partially Hydrogenated Oils (PHOs) from food products. Some European countries like Denmark and Switzerland, have set the

maximum limit for TFA at two percent of the total fat content in oils and fats, either consumed alone or as part of processed foods.

Kapoor also shared key learnings from various studies conducted across the world which show removing PHOs does not mean that trans-fat will be removed from all foods. Naturally, occurring trans-fat will still be found in small quantities coming from animal products and dairy products. He also discussed the global plan of WHO, banning of a food ingredient that causes 500,000 premature deaths worldwide each year, and eliminating artificial trans fats from the global food supply.

From the industry point of view, Kapoor shared some concerns raised by the industry: Inadequate supplies of trans-fat replacements might pose challenges to reformulation though the four- year compliance period will prove adequate; and packaging changes with requisite labelling might be an issue with micro/small food processors. He suggested that it is important to make available training/research support for Bakers/Food Processors for reformulation of their products, packaging and labelling.

Dr. Nikhil Tandon, HoD, Department of Endocrinology, AIIMS, Delhi made remarks from the perspective of a clinician dealing with area of Non Communicable Diseases (NCD) in particular. He pointed out two important aspects in relation to the issue:



- National level data released in November 2017 highlights two cluster of disorders i.e., One being communicable diseases and other dealing NCD. As recent as 1990, if one looks at the causes the mortality in states, only two States of Kerala and Goa dominated with NCD above communicable diseases. In 2016, every state of India had dominance of NCD indicating the transition in a very short span of time in comparison to countries which took centuries for that change. This is harbinger of what will continue to happen in coming years and also points to model of healthcare in India which looks more on finite and short term diseases and requires a change now.
- It sometimes takes a much longer period of time to identify the risk between nutritional factor and a disease outcome. There is scarcity of correct data available and also dependence of how the data mining is done without suiting the needs of individual. It is difficult for biomedical experts to come to a conclusion on any ingredient but one fat that remains consistently harmful for consumption and leads to metabolic disease like diabetes is Trans Fat. He said that as in the case of Tobacco, with Trans Fats, the message is clear.

Amit Khurana, Programme Director, CSE focussed on Food Labelling Regulations which he expressed, is going in the right direction, reducing the trans-fat limit to two percent. CSE has also submitted their comments of draft regulations to FSSAI and Khurana talked about the suggestions that can be incorporated in proposed regulations. Main highlights of the recommendations are as following:



- Nutritional labels should include Added Sugar along with Salt. Cap for added sugar should be less or max 25 gm. The display should be in following order: Carbohydrates-> Total Sugar-> Added Sugar.
- Dietary Fibre should be added in nutritional label.
- Standardise the serving size, so that nobody gets a chance to misguide consumers. Small serving size does not reduce the consumption. It is used as a marketing strategy to increase sales.

- Entire Fast Food Labelling is missed. Display of information on billboard, menu labels or point of purchase labelling can be thought of and included.
- Inclusion of trans fat on FoP labelling along with sugar, salt, etc. gives a wrong impression that it is required nutrient. Remove trans fats and instead add calorie value to utilise space appropriately.
- Exemptions are given based on 100 sq. cm size criteria. It is recommended that even small candies should include such information.
- At present, there is an exemption for reusable glass bottles. However, glass bottles are here to stay and should stay, therefore, shall not be exempted.
- Requirement of three pronged approach: Celebrity endorsement of junk food should not be allowed; No food endorsement of Sugar Sweetened Beverages (SSB) as restricted in some countries; and develop broadcasting regulations.
- GM Food labelling: Five percent threshold limit by weight is very relaxed and also not a practical approach. Instead in principle all products using GM crops should be labelled and one percent should be the limit.
- Fortified Food: Logo gives a health claim which is not a good approach.
- India is largely a Non-English speaking country and has its several regional languages. FSSAI should select at least few languages in which labels can display information.



Kanchan Zutshi, Secretary, FBMI represented Biscuits manufacturers of India through her presentation assured that FBMI has committed to reduce the Trans Fat content in all biscuits to less than 0.2 percent by 2022 in a phased manner. Industry is continuously working on to reduce Fat and Sugar further in the coming years through Recipe and Technology Innovation and Biscuit Industry is committed in their Endeavour to offer healthy products to improve the

nutritional status of biscuits through Fortifying biscuits, with the addition of minerals like Iron and Zinc, Vitamin A, B, and C which the Indian population consumes inadequately.

Zutshi also raised concerns from the side of Biscuit Industry on draft regulations as listed below:

- Normally two or three biscuits are consumed in a day which forms a serve size and it is not practical to convert it in 100 gm quantity.
- The principle of portion size, consumption of food and calculation of fat, sugar, salt, etc. as a percentage of RDA is recommended by WHO also. Hence, the threshold limit for fat as specified in Schedule I which is 8 gm per 100 gm of

biscuits and stipulation on value of energy from sugar not more than 10 percent of energy provided per 100 gm of biscuits will lead to unpalatable biscuits.

- The current proposed limit of total fat 8 gm/100g for biscuits will essentially deprive a person of fat requirement 34 g (306 Kcal) of daily fat requirement. The RDA for fat is 67 gm and generally 25 gm of fat is delivered through daily meals, the balance quantity of fat i.e. 42 gm which is required for the body functioning, is required to be fulfilled through snacking options.
- At a threshold limit of sugar not more than 10 percent of total energy provided by 100 gm of the product, it is not possible to make biscuits.
- US FDA Dietary Guidelines, WHO and FSSAI appointed expert committee recommend up to 10 percent of the energy value per day from *added* sugars, which is up to 50 gm/day.

Dr. G M Subba Rao, Scientist – E Deputy Director, NIN (ICMR), MoHFW, Government of India presented the perspective from a Nutrition Communication field. He said, labels are seen as a key way to provide nutrition information and promoting healthy food choices. From consumer perspective, if labels have to be successful there are some prerequisites like: First, consumers have to buy prepackaged foods; Second, in the current form, labels are text intensive and mostly in English, so people are to be literate and specifically nutrient literates.



Today, nutrition is seen as major factor in development of nation which projects historic opportunity. There are some constraints for consumers to use labels:

- Understanding labels without nutrition literacy or basic awareness
- Taste which is priority to choose food over labels.
- Assumption that big brands take care of safety of consumers- implying importance of industry to be part of this initiative and take a lead

Subba Rao projected some recommendations to strengthen the regulations:

- School-based introduction of 'Nutrition' as a skill based activity telling children what is there on the label and how to read the information.
- FoP is a decisive and very welcome step at this initial level and needs strong industry participation. It is a continuous process and needs attention every now and then.
- He shared the thoughts with other panelists regarding the use of simple symbols and options for use of regional languages.
- All the labelling formats are to be pre-tested or tested with consumers thoroughly and FSSAI should also consider this seriously.

- Promoting Nutrition Literacy through initiatives like *Eat Right Movement* and use of E-portals and social media.

Also, NIN is also working to modify the present form of labelling into more visual intensive thing through different ideas:

- Use of acronyms like '*BACHNA-Be Aware of Certain Health and Nutrition Affects of Fats, Sugar and Salt*' and '*KHANA-Key Health and Nutrition Attributes*' mentioning fibre and protein clearly.
- Use of *emoticons* and *smileys* at places but this is still research in progress.

The major concerns raised are as following:

- Present labels are text-intensive which need to be reworked.
- Hesitation of industry is natural but they can still lead the back and be harbingers.
- The issue of empty calories needs to be taken into consideration.
- Lack of nutrition literacy can act as a barrier and should be taken care of from the initial level only.
- Models which were successful in different countries might not be best for India, so proper research should be done before finalising regulations.
- Places like restaurants and *Halwai* shops (sweet shops) should not just provide nutrition book on demand but it should be visible and made mandatory. If possible, where food products are displayed, a nutrition card should be placed adjacently.
- With regard to REPLACE package of WHO, along with proper review and promotion of legislation, intense enforcement, assessment and awareness should also be taken into consideration.
- There should be some amount of rationality for allowing the use of Fortification logo because the tagline attached to it, unknowingly displays a health claim.

Open Discussion

Dr. Bhaskar indicated in the open discussion session that FSSAI takes pride being one of regulators with keeps pace in comparison to any of the regulatory agencies of developed countries which have taken years and years to come up with regulations. It was not easy and will not be easy but FSSAI has always been open and transparent regarding their work.

Highlights

- Fortified Food Labels can create confusion and industry can misuse it
- Artificial sweeteners: Not Harmful? Clarify the real pictures
- Nutritional Literacy should be imparted to children

- Alternatives to trans-fat and sugars are available. Is there is need to take permission by FSSAI to use them?
- Labelling has to be very simple for consumer to understand them
- Discussion on RDAs, Added Sugar and Fortified Food Labels

Dr. Satish Kulkarni along with other panellists present in the consultation clarified the queries of the audience and assured that all the comments/suggestions/recommendations shared in the Consultation will not only be submitted to FSSAI but also be taken into consideration step by step.

Summing Up and Way Forward



Dr. Bhaskar in his concluding remarks assured that FSSAI is a responsible regulator and standards/rules/regulations are always open for change according to need and changing times. He said, people need to move from trans-fats to trans-food and it is important to know what they eat is right and healthy.

Directing the Consultation day towards a positive end, **George Cheriyan** summarised the proceedings and said that since April 2018 when the draft regulations were put in public domain for comments till last month, when everyone believed that there is stagnation due to opposition from some stakeholders, CUTS stepped into make a positive impact. The idea was to initiate a dialogue between various stakeholders where one can put forward views and today it was successfully executed.

The expert panel constituted by CEO will have a second responsibility of reaching at a consensus in the coming days, and expect a strong set of regulations even if it requires more time. Cheriyan thanked Pawan Agarwal and his team along with all the participants present in the Consultation for sparing their valuable time and putting efforts to initiate the discussion on the subject and thereby taking a step forward.

Vote of Thanks

Madhu Sudan Sharma, Senior Programme Officer, CUTS extended vote of thanks on behalf of CUTS International to the participants. He thanked Pawan Agarwal, Kumar Anil, N Bhaskar, Sunil Kulkarni, AC Mishra, Chirag and Mallika from FSSAI for their benign presence and dedicated efforts to help CUTS team to



make the consultation interactive and meaningful. Sharma also thanked all the panellists Vanadana Shah, Aakansha Choudhary, Dr. Nikhil Tandon, Kanchan Zutshi, Raj Kapoor, Dr. SubbaRao and Amit Khurana for their informative presentations, valuable thoughts and suggestions on the theme to strengthen the draft regulations. Moreover, other participants from different states and from Delhi were also thanked for their valuable contribution.

Programme Schedule

9.30-10.30 am	Registration, Tea & Informal Interactions	
10:30-11:30 am	Inaugural Session	
	Welcome & Opening Remarks	Shri George Cheriyan Director, CUTS International
	Keynote Address	Shri Pawan Agarwal Secretary to Government of India & CEO, FSSAI
	Special Address	Shri Rajeev Kumar Director (NCD), Ministry of Health & Family Welfare, Government of India
11.30-11.45 am	Tea Break	
	Technical Session-I	
11.45 am -1:00 pm	Chair: Dr. Satish Kulkarni , Former Head, National Dairy Research Institute, Bengaluru <ul style="list-style-type: none"> • Food Safety & standard (Labelling & Display) Regulation, 2018 • Strengthening Labelling Regulations: Consumer Perspective • International Best Practices on Labelling & Display Open Discussion	Panellists Presentations(15 min each) <ul style="list-style-type: none"> • Shri Kumar Anil, Advisor (Standards), FSSAI • Ms. Aakansha Choudhary, CUTS International • Prof. Barry M. Popkin W.R Kenan, Jr. Distinguished Professor, University of North Carolina at Chapel Hill
1:00-2:00 pm	Lunch	
2:00-3:30 pm	Technical Session - II	
	Eliminating Trans fats and Reducing HFSS: Concerns & the Way Forward Chair: Dr. N. Bhaskar , Advisor(QA), FSSAI	Panellists <ul style="list-style-type: none"> • Dr. Nikhil Tandon, HoD, Dept. of Endocrinology, AIIMS, Delhi • Dr. G.M. Subba Rao, Scientist-E Deputy Director, NIN(ICMR), MoHFW, GoI • Ms. Rachita Gupta National Professional Officer, Nutrition, WHO • Ms. Kanchan Zutshi Secretary, Federation of Biscuit Manufacturers of India (FBMI) • Mr. Amit Khurana Programme Director, Centre for Science & Environment • Mr. Raj Kapoor Managing Director, Assocom Institute of Bakery Technology & Management (AIBTM)
3:30-4:00 pm	Summing Up & Way Forward	Shri Pawan Agarwal , FSSAI Shri George Cheriyan , CUTS International
	Vote of Thanks	Mr. Madhu Sudan Sharma Senior Programme Officer, CUTS International
4:00-4:30 pm	High-Tea & Departure	

List of Participants

S.No.	Name	Designation	Institutes/Organisation
Representatives from Government Bodies			
1	Mr. Rajeev Kumar	Director, NCD	Ministry of Health and Family Welfare New Delhi
2	Dr. Prabha Arora	Deputy Director General (DDG), Non Communicable Disease (NCD)	Directorate General of Health Services, Ministry of Health & Family Welfare, Govt. of India, New Delhi
3	Mr. Gyanendra Kumar	President	Voluntary Health Association of India (VHAI), Delhi
4	Dr. Deepika Saraf	Scientist- D, Division RMPPC	Indian Council of Medical Research (ICMR), New Delhi
Clinicians & Public Health Experts			
5	Dr. Nikhil Tandon	Head of the Department of Endocrinology	All India Institute of Medical Sciences (AIIMS), New Delhi
6	Dr. Nandita Murukutla	Vice President, Global Policy and Research, Policy Advocacy and Communication	Vital Strategies, Gurugram, Haryana
7	Dr. Roopa Shivashakar	Senior Consultant, Cardiovascular Health	RESOLVE TO SAVE LIVES, Gurgaon Road, Gurgaon, Haryana
8	Dr. Mohan Bairwa, MBBS, MD	Assistant Professor (Public Health & Epidemiology)	IIHMR University, Jaipur, Rajasthan
9	Dr. Sreejith N Kumar	Consultant in Diabetes, Medicine Chairman Indian Diabetes Education Association National Secretary IMA MSN	Diabetes Care Centre, Kochar Road, Sasthamangalam, Trivandrum, Kerala
Scientists/Academicians/Technical Experts			
10	Dr. S.N. Naik	Professor, Centre for Rural Development and Technology (CRDT)	Indian Institute of Technology (IIT), Hauz Khas, Delhi
11	Prof. Raman Puri	Founder & Chairman & Senior Interventional Cardiologist, Apollo Hospital, Delhi	Lipid Association of India (LAI), Delhi
12	Dr. G.M. Subba Rao,	Scientist-E, ICMR	ICMR- National Institute of Nutrition, Hyderabad
Consumer/ Policy Advocacy Groups/ CSOs Representatives			
13	Mr. Sunil Prakash	President	Consumers' Forum Suryashraye, 13 PalmWood, Malibu Towne, Sohna Road, Gurgaon
14	Ms. Reeta Nayak	Consumer Activist	New Delhi
15	Ms. Neetu Chauhan		Consumer Coordination Council, New Delhi
16	Mr Nalin Sinha	India Coordinator	GHAI
17	Ms. Radhika Shrivastav	Director- Health Promotion	HRIDAY (Health Related Information Dissemination Amongst Youth) New Delhi

18	Ms Somya Tewari	Senior Project Associate	Global Alliance for Improved Nutrition (GAIN)
19	Ms Veena Sharma	Joint Secretary	Roller Flour Millers Federation of India Roller Federation
20	Ms. Surbhi Negi	Research Officer	World Food Programme, New Delhi
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25	Mr. Pramod Deodhar	Advisor, Food Technologist and former member on FSSAI, Food labelling committee	Mumbai Grahak Panchayat, Grahak Bhavan, Sant Dnyaneshwar Marg, Behind Cooper Hospital, Vile Parle West, Mumbai, Maharashtra 400056
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31	Ms Nandni Verma	Consultant	CTFK
32	Mr. Narendra Kumar		CTFK
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35	Mr. Varun Kumar	Sr. Advisor	CPHFS
36	Ms. Laxmi		PTI, New Delhi
37	Mr. Rajat Singh		CTFK
38	Ms. Vaidehi		Vital Strategies
39	Mr. Gaurav		CTFK
40	Mr. Anil Kumar Singh		Multi Vision Foundation, Delhi
41	Mr. Himanshi Singh		Multi Vision Foundation, Delhi
42	Mr. Amit Khurana	Programme Director	Centre for Science and Environment, New Delhi
43	Ms. Shruti Sharma		VANI, Delhi
44	Yolonda Richardson	Executive Vice President, Global Programs	GHAI
FSSAI			
45	Shri Pawan Kumar Agarwal	Chief Executive Officer	FSSAI, New Delhi
46	Shri Kumar Anil	Advisor (Standards)	FSSAI, New Delhi
47	Mr. Bhaskar N.	Advisor (Quality Assurance)	FSSAI
48	Shri Satish kulkarni	Former Head	National Dairy Research Institute, Bengaluru

49	Dr. A.C. Mishra	Joint Direct (Standards)	FSSAI, New Delhi
50	Chirag Gadi		FSSAI, New Delhi
Association/Industry Representatives			
51	Mr. Raj Kapoor	Managing Director	Assocom Institute of Bakery Technology & Management (AIBTM) Delhi
52	Ms. Kanchan Zutshi	Secretary	Federation of Biscuit Manufacturers of India (FBMI) New Delhi
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54	Mr. Guru Murti	Executive Director	The Vanaspati Manufacturer's Association of India New Delhi
55	Mr. Shakeel Ahmed		VMAI, New Delhi
56	Mr. Atul Joshi		Patanjali Ayurved Limited, Haridwar
57	Ms. Sangeeta Chadha	Associate Director, Regulatory Affairs, HUL	Delhi Jaipur Highway, Gurgaon
58	Mr. Abhinav Singh	Deputy Director, Food Processing, CIFTI	Federation of Indian Chambers of Commerce and Industry (FICCI), New Delhi
CUTS Staff			
59	Vijay Singh		CUTS DRC, Delhi
60	Ram Sharan		CUTS DRC, Delhi
61	George Cheriyan	Director	CUTS International, Jaipur
62	Madhu Sudan Sharma	Senior Programme Officer	CUTS International, Jaipur
63	Satya Pal Singh	Programme Associate	CUTS International, Jaipur
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FSSAI ropes in expert panel to review food labelling standards

BY PTI | AUG 17, 2018, 02:39 PM IST

NEW DELHI: The government has put on hold the draft that proposes red-labelling of packaged food products containing high levels of fat, sugar and salt, FSSAI CEO Pawan Kumar Agarwal said today.

In April, food safety regulator FSSAI had come out with the draft of Food Safety and Standards (Labelling and Display) Regulations 2018 that propose mandatory red-label marking on such packaged food products.

"Our pre-draft was ready and sent to the Health Ministry. Since there were concerns expressed by some stakeholders, we have kept it on hold for time being and a group of experts from health and nutrition background has been set up to look into the issue of

Expert panel reviewing food labelling standards: FSSAI

Government puts on hold the draft that proposes red-labelling of packaged food products containing high levels of fat, sugar and salt

Last Published: Fri, Aug 17 2018, 04:02 PM IST



FSSAI sets up expert panel to look into draft labelling regulations

OUR BUREAU



NEW DELHI, AUGUST 17

The Food Safety and Standards Authority of India (FSSAI) has decided to form a three-member committee to look into the draft food labelling and display regulations. The regulations have proposed making red colour-coded labels mandatory on packaged food products which are high in fat, sugar and salt contents.

Pawan Agarwal, CEO, FSSAI, said, "The pre-draft was earlier sent to the Health Ministry for finalisation. However, industry stakeholders have expressed concerns. So we have decided to set up a panel of experts with health and nutrition background to look into the draft regulations." He said that front-of-the-pack labels are required to make consumers more aware about healthy and unhealthy food products. The expert panel will be led by B Sesikeran, former director of National Institute of Nutrition (NIN), and comprise current NIN director Hemalatha and AIMS' Nikhil Tandon.

Agarwal was speaking at a national consultation on food labelling regulations for safe and healthy food organised by CUTS International in collaboration with FSSAI.

FSSAI has, in the past, said it is open to suggestions from industry stakeholders and it will look at labelling regulations adopted by other countries across the world. The draft labelling regulations were released in April. Industry stakeholders believe these may have an adverse impact on the evolving packaged food industry.

George Cheriyan, Director, CUTS International, said India can learn from the best practices from the other countries and

PTI



FSSAI CEO Pawan Kumar Agarwal. Photo: Mint

New Delhi: The government has put on hold the draft that proposes red labelling of packaged food products containing high levels of fat, sugar and salt, FSSAI CEO Pawan Kumar Agarwal said today. In April, food safety regulator FSSAI had come out with the draft of Food Safety and Standards (Labelling and Display) Regulations 2018 that propose mandatory red-label marking on such packaged food products.

"Our pre-draft was ready and sent to the health ministry. Since there were concerns expressed by some stakeholders, we have kept it on hold for time being and a group of experts from health and nutrition background has been set up to look into the issue of labelling once again," Agarwal said.

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खाद्य लेबलिंग मानदंडों की होगी समीक्षा

Publish on August 18, 2018

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नई दिल्ली : भारतीय खाद्य सुरक्षा एवं मानक प्राधिकरण (एफएसएसआई) के मुख्य कार्यपालक अधिकारी (सीईओ) पवन कुमार अग्रवाल ने कहा कि सरकार ने अधिक वसा, चीनी एवं नमक वाले डिब्बा बंद खाद्य उत्पादों पर लाल 'लेबल' लगाने के प्रस्ताव वाले मसौदे को फिलहाल रोक कर दिया है। खाद्य सुरक्षा नियामक एफएसएसआई इस संबंध में खाद्य सुरक्षा एवं मानक (लेबलिंग एवं डिस्प्ले) नियमन 2018 का मसौदा में लेकर आया। इसमें ऐसे डिब्बा बंद खाद्य उत्पादों पर लाल लेबल लगाना अनिवार्य करने का प्रस्ताव किया गया है। अग्रवाल ने कहा कि मसौदा पूर्व की रूपरेखा तैयार है और इसे स्वास्थ्य मंत्रालय के भेजा गया है। चूंकि कुछ पक्षों ने इसको लेकर चिंता जतायी है, अतः हमने इसे मय के लिये स्थगित रखा है और स्वास्थ्य तथा पोषण से जुड़े विशेषज्ञों का समूह गठित किया गया है जो एक बार फिर लेबल लगाने के मुद्दे पर करेगा।

स इंटरनेशनल हेल्थ मिनी (एनआर) खाद्य उद्योग की चिंता है। राष्ट्रीय परामर्श कार्यक्रम को संबोधित कर रहे थे। विशेषज्ञ समिति की अध्यक्षता राष्ट्रीय निदेशक हेमलता के अलावा डाक्टर निखिल टंडन भी हैं। अग्रवाल ने कहा कि

FSSAI ropes in expert panel to review food labelling standards

PTI | Aug 17, 2018, 02:21 PM IST

New Delhi, Aug 17 (I) The government has put on hold the draft that proposes red-labelling of packaged food products containing high levels of fat, sugar and salt, FSSAI CEO Pawan Kumar Agarwal said today.

In April, food safety regulator FSSAI had come out with the draft of Food Safety and Standards (Labelling and Display) Regulations 2018 that propose mandatory red-label marking on such packaged food products.

"Our pre-draft was ready and sent to the Health Ministry. Since there were concerns expressed by some stakeholders, we have kept it on hold for time being and a group of experts from health and nutrition background has been set up to look into the issue of labelling once again," Agarwal said.

He was addressing a national consultation on the draft regulation organised by the CUTS International. The expert panel will be headed by B Sesikeran, former director of National Institute of Nutrition (NIN) as also the current director Hemalatha, besides doctor Nikhil Tandon, he said.

The labelling regulations have remained the major contentious issue in the food industry which sees it as an impediment to their sales.

Agarwal said the panel will study in detail the concerns of the industry and make recommendations, he added. "May be a little bit of tweaking (to the draft regulations) is required. We are open to it without compromising the basic direction of the labelling regulations," Agarwal said.

Pitching for bringing in strong labelling norms at the earliest, the FSSAI CEO said it is difficult to ask consumers to change eating habits as some eat mindlessly, while some cannot differentiate between healthy and unhealthy food products.

"In this situation, I feel we can make a dent if we can address it at the supply side by asking companies to adhere to the labelling norms," he added.

Agarwal also made it clear that Food Safety and Standards Authority of India (FSSAI) will go ahead with the labelling norms even if there is no full consensus on the matter after the panel's suggestions.

FSSAI ropes in expert panel to review food labelling standards

PRESS TRUST OF INDIA
New Delhi, August 17

THE GOVERNMENT HAS put on hold the draft that proposes red-labelling of packaged food products containing high levels of fat, sugar and salt, Food Safety and Standards Authority of India (FSSAI)'s chief executive officer Pawan Kumar Agarwal said on Friday.

In April, the food safety regulator had come out with the draft of Food Safety and Standards (Labelling and Display) Regulations, 2018, that proposes mandatory red-label marking on such packaged food products.

"Our pre-draft was ready and sent to the health ministry. Since there were concerns expressed by some stakeholders, we have kept it on hold for time being and a group of experts from health and nutrition back-

The labelling regulations have remained the major contentious issue in the industry which sees it as an impediment to their sales

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Media Coverage Please visit: <http://cuts-international.org/cart/ssflr/Media-Food Labelling Regulations for Safe and Healthy Food-August17-2018.htm>