

National Consultation on
‘Food Labelling Regulations for Safe and Healthy Food’
August 17, 2018, New Delhi

Background Note

Introduction

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 The fact that India is sadly known for its highest heart patient mortality rates and Indians experience heart attacks 8-10 years earlier than others² calls for an immediate attention to look into responsible reasons. It is predicted that India will be burdened with approximately 25% of cardiovascular-related deaths and would serve as a home to more than 50% 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 & fried street food available at streets, restaurants and also as packed food in stores.

In 2015, FSSAI revised the limits of trans-fatty acids to be not more than 5% in the Vegetable Fat/Oil, Margarine and Fat Spreads and Hydrogenated Vegetable Oils 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 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% and deaths by 28%.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 calls for an inclusive approach to fight the menace of HFSS and trans-fats in our food. The National Dietary Guidelines of Nordic Countries have shown to prove how policy can drive the change in food habits of citizens. Several other countries like Denmark, Iran, Chile, Norway, Singapore, South Africa and Ecuador have started their fight against TFAs and India doesn’t want to be left behind. There is important role of Government, Food Industry of India, Health Experts and Academia, CSOs and most importantly, the Consumers, who need to demand for healthier and safer options when it comes to their 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 Food Safety and Standards Authority of India (FSSAI) under Ministry of Health and Family Welfare, Government of India is 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 5% in certain oils by 2017 and further committing to reduce the same to 2% by 2022.

Very 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 want to consume. In a significant move, the new regulation requires food high in sodium, sugar and fat to carry front-of-package warning labels.

Front-of-package label (FoPL) designs, which are clear and impactful, play an important role in increasing awareness and shifting food-eating norms. Mandatory FoPL are considered by governments around the globe as an effective and evidence-based way to improve diets. At least 16 FoPL systems are operating in 23 countries, with another 14 schemes proposed.

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. The major concerns are raised by stakeholders from Industry, Health Experts and CSOs with their own set of suggestions and recommendations on how these regulations should come out finally.

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 the leading public health universities across the globe.

To bring all the relevant stakeholders on single platform CUTS in partnership with FSSAI is organising a National Consultation on August 17, 2018 in Delhi. The consultation aims 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.