

NUTRITION ADVOCACY IN PUBLIC INTEREST-India (NAPi)

June 10, 2021

To,

Shri Arun Singhal, IAS
Chief Executive Officer
Food Safety Standards Authority of India (FSSAI)
Government of India, New Delhi.

Subject: Front of Pack Labelling Regulations, our submissions

Dear Mr. Singhal,

We write to you on behalf of Nutrition Advocacy in Public Interest (NAPi), a think tank consisting on technical experts, academicians, administration, medical and public health professionals working on nutrition policy in public interest for the past five years. NAPi has been working on policy issues related to ultra -processed foods and we had submitted our suggestions regarding policy interventions, FSSAI had acknowledged vide its letter F.No.1/Miscellaneous/SBCD/FSSAI-2020-21 on 16.9.20.

In continuation of this work, NAPi on 4 June, 2021, organised a webinar with partners including Breastfeeding Promotion Network of India (BPNI), Paediatric and Adolescent Nutrition Society (PAN) of the Indian Academy of Pediatrics , and Epidemiology Foundation of India (EFI) on Future of “Strong Nutrition Profile Modelling (NPM)” for Healthy Food System in India to prevent NCD burden. Scientific experts were concerned about the recent national evidence from the Comprehensive National Nutrition Survey data revealing that among children between 5 to 19 years of age, 56% of them had cardiometabolic risk factors, with similar prevalence in those who are believed to be undernourished: thin-54% and stunted-59%.¹ If these alarming signals are ignored now, India will pay heavily with a very large wave of Non Communicable Diseases (NCDs) that will attack this generation of children as they grow into adults. Front of the Pack Labelling is one of the recommended core interventions to mitigate this alarming situation. Several countries including Brazil and Mexico have utilized the World Health Organization’s (WHO)recommended ‘cut offs’ for nutrient profiling to come up with easily understandable front of pack labelling for packaged food with high fat, sugar, and/or salt (HFSS) content. It is understood that the FSSAI is also in the process of formulating front of pack labelling for HFSS content after consultations with civil society, food industry and nutrition experts for a viable model for India.

¹Sachdev HS, Porwal A, Sarna A, Acharya R, Ramesh S, Kapil U, Kurpad AV. Intraindividual double-burden of anthropometric undernutrition and “metabolic obesity” in Indian children: a paradox that needs action. *Eur J Clin Nutr.* 2021; Published Online April 23, 2021 <https://doi.org/10.1038/s41430-021-00916-3>

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NAPi believes that extensive research regarding the appropriate 'cut offs' for nutrients of concern has already taken place, and WHO has recommended evidence-based thresholds for HFSS products. NAPi also believes that the food safety for the consumers of packaged foods should be assured through appropriate packaged information based on relevant evidence instead of marketing-based influence of the food industry. Therefore, we submit the following requests for consideration.

1. Front of pack labels on packaged foods with more than one ingredient should be based on the WHO recommended thresholds as these are being used worldwide.
2. NAPi humbly requests you to allow us to be a part of the stakeholders consultation and the working group, as we bring in the public health and nutrition concerns with decades long expertise in health policy work.

A line of response from your side would be appreciated.

Thanking you,

Yours Sincerely,

NAPi Members

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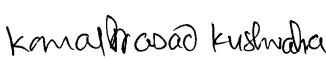
Prof. HPS Sachdev



Prof. Umesh Kapil



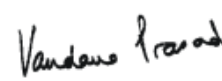
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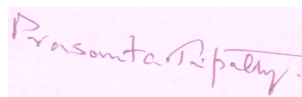
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