

# NUTRITION ADVOCACY IN PUBLIC INTEREST-India (NAP*i*)

February 22, 2022

## MEMBERS

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To,  
**Sh. Narendra Modi,**  
**Hon'ble Prime Minister,**  
**Government of India**  
**New Delhi.**

**SUB:** Withdrawal of the Draft Notification of FSSAI of 17 Nov 21, on Genetically Modified or Engineered Foods

Hon'ble Sh. Modi Ji,

We represent a national think tank on nutrition, Nutrition Advocacy in Public Interest (NAP*i*) that has come together to advocate on nutrition policy in public interest. It consists of independent experts in epidemiology, human nutrition, community nutrition and pediatrics, medical education, administration and management; all having decades of experience in our respective fields.

We like to draw your attention to the Draft FSSAI Notification, dated November 17, 2021, of the FSSAI: the Food Safety and Standards (Genetically Modified or Engineered Foods) Regulations, 2021. This sounds an alarm that GM foods may flood the Indian market. We submit as under:

1. We understand that the Ministry of Environment has the primary responsibility to regulate GMOs[i].
2. The GEAC continues to be the overall regulatory agency for Biosafety, which includes both public health and impact on Biodiversity and the Environment. Mandate of the Ministry of Health and Family Welfare and is to protect the health of the Indian people. To govern biosafety, the Government of India issued these Rules [ii].
3. The FSSAI has a mandate of "food safety" defined in terms of industrial processing, not safety in the public health context. It is not a public health body.
4. We are aware of the ethical concerns that have been raised about GM crops e.g. potential harm to human health, potential damage to the environment, and negative impact on traditional farming practices. It is clear that GM foods could be imported and sold, would likely be "Ultra-processed food products"(UPF). Consumption of UPFs presents several health hazards such as cancers, Type-2 diabetes, Obesity, Cardiac disease, depression, frailty to quote a few. This is because of their nature of processing and additives, The global GMO and processed food industry is looking at India as a big market and they have no concerns when it comes to public health. By paving an easy way for GM foods, this would allow unhealthy foods to flood our food chain.
5. Other than this, 99% of the GMO crops grown in the world are herbicide tolerant, Glyphosate/Roundup resistant. Glyphosate is a possible carcinogen, and causes kidney and liver failure. And the GMOs can escape and potentially introduce the engineered genes into neighboring crops and their persistence after having been harvested.

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Social Worker

6. The FSSAI in its draft proposals recognizes that GM foods are risky to the health of babies saying 'NO GMOs in Infant Foods', why can't we apply the same precautionary principle to the general population? Such ultra-processed foods, when in the market and enter the family basket, will be eaten by children as well as pregnant mothers and breastfeeding mothers, could affect unborn babies and breastfed babies.

7. Given that there is strong association of consumption of ultra- processed foods and obesity and other NCDs<sup>[iii]</sup>, and obesity being associated with higher Covid mortality, it is pertinent that ultra-processed foods and on top of it unhealthy GM foods are not allowed to be made available in India. Current regulations do not protect public health.

8. Deeply concerned, we urge you to use your highest office to withdraw these regulations.

9. We have written to the CEO FSSAI on this issue on 3rd February 2022 (Annex-1)

With thanks and kind regards,

Yours Sincerely,



Dr. Arun Gupta on behalf of the NAPi Team

## **Copy to:**

Sh. Rajiv Gauba, Cabinet Secretary for Necessary Action  
Dr. Mansukh Mandaviya, Minister of Health and Family Welfare, GOI  
Sh. Bhupender Yadav, Minister of Environment, Forest and Climate Change, GOI  
Dr. Jitendra Singh, Minister of Ministry of Science & Technology, GOI  
Sh. Jairam Ramesh MP, Former environment Minister  
Sh. Ghulam Nabi Azad MP Former Health Minister

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[i] [http://www.geacindia.gov.in/resource-documents/13\\_2-Regulatory\\_Framework\\_for\\_GE\\_Plants\\_in\\_India.pdf](http://www.geacindia.gov.in/resource-documents/13_2-Regulatory_Framework_for_GE_Plants_in_India.pdf)

[ii] [https://ibkp.dbtindia.gov.in/DBT\\_Content\\_Test/CMS/Guidelines/20181115121526033\\_Rules-for-the-manufacture-use-import-export-and-storage-1989.pdf](https://ibkp.dbtindia.gov.in/DBT_Content_Test/CMS/Guidelines/20181115121526033_Rules-for-the-manufacture-use-import-export-and-storage-1989.pdf).

[iii] <https://www.mdpi.com/2072-6643/14/1/23>

To:

February 3rd, 2022

**The Chief Executive Officer,  
Food Safety & Standards Authority of India (FSSAI)**

Dear Sir,

**Sub:** Draft Regulations on GM Foods put out by FSSAI for public feedback - reg.

This is with regard to FSSAI's proposals for regulating GM foods in India, as per Section 22 of the Food Safety and Standards Act 2006. We are a group of medical professionals from all over India, with different specialisations and expertise, writing to you on this subject. As you are aware, food safety is one of the key determinants of health of ordinary citizens apart from various other factors, and we therefore understand the importance of the statutory mandate you have with regard to ensuring safe and wholesome food.

GM foods, created out of deployment of modern biotechnology, are risky and therefore, the need for regulation. In India, the biosafety dossier of Bt brinjal and detailed analysis by numerous independent experts of the results of different health safety studies pointed to how it cannot be concluded to be safe for human health. In fact, the conclusions veered towards how it could be toxic as human food. Bt brinjal's release in India was put on an indefinite moratorium in 2010. Herbicide Tolerant Mustard was the next GM food crop, which was hastily cleared by the regulators without the biosafety dossier even put out in the public domain. Tests that ought to have been done were not even done, just like in the case of Bt brinjal too. It appears that independent scientific scrutiny of the developers' own data is being feared now. However, citizens once again resisted and opposed this, and commercial cultivation approval has been put on hold. While two GM food crops were stopped for cultivation in India through the presentation of scientific rationale that challenged any regulatory compromises, with citizens and state governments taking a firm stand against GM technology in our food and farming systems, FSSAI has now come up with these draft regulations.

It appears that these proposed regulations are actually a way to circumvent the fact that risky GM technology can be brought in only if regulations are compromised, and not by a rigorous biosafety assessment and protection regime (because any rigorous regime will reflect the inherently unsafe nature of this technology). These regulations have nothing about independent, long term, comprehensive, multi-generational biosafety assessment and seem to be ready to accept regulatory approvals for GM foods elsewhere, to allow them in India too. Such an approach obviously puts a question mark on the very purpose of notifying any regulations in the first instance. It is clear that India's unique food cultures, our consumption and malnutrition situation, our poor state of public health and weak public healthcare systems, and our citizens' preferences have all been set aside somewhat irresponsibly, as important considerations for framing these regulations. It is a matter of additional concern that unknown and possibly toxic effects in undernourished children have been ignored in these draft regulations. State governments and their policy positions on the matter also do not seem to matter, even though Public Health is a state subject.

Meanwhile, there is a body of scientific evidence to show the health risks that GM foods present. It appears to be from genes used in this technology and their toxic nature, from the genetic engineering process itself and the unpredictable, unstable changes that happen at the molecular level, from potential horizontal gene transfer and also from the toxic chemicals

that usually accompany GM crops (the largest grown GM crops in the world, herbicide tolerant GM crops, have increased use and absorption of deadly herbicides by the crop, while insect resistance crops like Bt crops have toxins newly produced inside the plant even as pesticide usage increases in these crops too). From a perusal of published literature, it appears like organ damage, reproductive health problems, immunity compromise, effects on growth and development of an organism, allergies and so on can be the adverse health impacts from GM foods. Studies also show altered nutritional composition of foods. In such a context, it is but natural that citizens expect utmost responsibility and commitment from FSSAI to fulfil its primary mandate related to food safety. However, the draft regulations do not reflect this.

Further, it is clear that GM foods, especially in the case of imported GM foods, will be in the form of Ultra Processed Foods, consumption of which, by their nature of processing, presents several health hazards such as cancers, Type-2 diabetes, Obesity, Cardiac disease, depression, frailty to quote a few . By paving an easy way for GM foods, FSSAI would also be allowing unhealthy UPFs to flood our food chain.

We are aware of the fact that for far too long, the Food Safety Authority has been reluctant to regulate GM foods, for reasons unclear to us, even though it was ready to regulate recommended foods like organic foods, which are highly in demand. FSSAI did not take stringent and deterrent action against sale of GM foods even though they were illegal and unpermitted. Now, it is seeking to formally pave the way for easier entry of all kinds of GM foods.


Through this letter, we want to let you know, as medical professionals, that the draft regulations are unacceptable in terms of their ability to uphold food safety. Today, the reality is that no GM foods have been permitted to be imported into, or sold in India. This *de jure* regulatory reality should be implemented, with penal action taken against anyone selling GM foods. This is what we seek from FSSAI. It should essentially ensure that GM foods do not enter our food chain, and that its regulatory tools and mechanisms (of sampling, inspection, testing etc.) ensure that no GM foods are sold in India.

We therefore request you to withdraw the proposed unacceptable regulations completely, and revise the proposals drastically to ensure that the regulatory regime is mainly to keep GM foods out of the diets of Indians.

**For your information, 162 doctors have endorsed this letter.( List Attached)**

With regards,

Sincerely,



**Dr. Arun Gupta MD FIAP**  
**Paediatrician and Public Health and Nutrition Expert ,**

**Copy to:** Dr Mansukh Mandaviya, Union Minister for Health & Family Welfare, Govt of India

### List of endorsers

S. No	Full Name (Dr)	Affiliation	Location (State And Place)
1.	Dr. K Karthikeyan	Pediatrics	Pondicherry, Pondicherry
2.	Dr. Vijay Ahuja	Pediatrics	Punjab
3.	Dr. S. N. Basu	Obstetrics And Gynaecology	Delhi, Delhi
4.	Dr. Veena Shatrugna Md	Clinical Nutrition And Biochemistry	Bengaluru, Karnataka
5.	Dr. Divya Sriharan	Lactation Consultant; Iycf ;Miyen	Tamil Nadu; Chennai
6.	Dr. Balbir Singh	Ophthalmology	Punjab
7.	Dr. Jayalakshmi Rajesh	Pediatrics	Tamil Nadu
8.	Dr. Rakesh Kumar	Pediatrician,	Bihar, Patna
9.	Dr. Sreelatha.B	Public Health	Kerala
10.	Dr. Selvan Rathinasamy	Child Specialist	Erode, Tamilnadu
11.	Dr. Randall Sequeira	MD Medicine	Odisha, Kalahandi
12.	Dr. Bharat Shah	Paediatrics	Gujarat
13.	Dr. Prem Kumar Singla	Pediatrics	Panipat, Haryana
14.	Dr. Abdul Ghafur	Infectious Diseases	Chennai
15.	Dr. Shacchee Baweja	Paediatrics	New Delhi
16.	Dr. Suchitra Ramkumar	GP	Chennai Tamil Nadu
17.	Dr. Pradeep Kumar Agarwal	Pediatrics	Delhi
18.	Dr. Mallikarjuna Hb	Pediatrics	Karnataka-Bangalore
19.	Dr K V Raghunath	Pediatrician	Adoni Ap
20.	Dr. Pankaj Nagindas Mehta	Family Medicine	Kandivali West Mumbai Maharashtra
21.	Dr. Rupal M Dalal	Pediatrics	Maharashtra
22.	Dr. Aathisha	Women's Health Physiotherapist	Coimbatore, Tamil Nadu
23.	Dr Manish Dhuri	Anorectal Surgeon, Piles Fissure Distula Specialist	Maharashtra Mumbai
24.	Dr. Meera Ragavan	Gynaecology	Chennai India
25.	Dr. Athisha Mb	MBBS	Karnataka, Bangalore
26.	Dr. Subodh Nadkarni	Family Physician	Maharashtra
27.	Dr. Tribhuvanesh Yadav	MD (Pediatrics)	Uttar Pradesh
28.	Dr Jesal Sanghavi	MBBS	Mumbai
29.	Dr. Arun Kumar	MBBS, MD Community Medicine	Haryana
30.	Dr. Milinda M B	General Practitioner	Karnataka
31.	Dr. Sanchita Bhattacharya	Physician	Delhi

32.	Dr. Meeta .Adhiya.	Family Physician	Maharashtra,Mumbai
33.	Dr. R P Ilango	Respiratory Medicine	Tamilnadu
34.	Dr Shaihla Ansari	Public Health Consultant	Maharashtra
35.	Dr. Sharad Mehta.	Family Physician.	Mumbai-Maharashtra..
36.	Dr. Sapna	Physiology	Kerala
37.	Dr. Sivasubramaniam	Cardiology	Dharmapuri Tamilnadu
38.	Dr. Ritu Priya	Social Medicine And Community Health	New Delhi, Delhi
39.	Dr. Shailaja Mane	Pediatrician	Maharashtra
40.	Dr Sameer Tuteja	Pediatrics	Haryana (Fatehabad)
41.	Dr. H S Sabharwal	Pediatrician	Haryana Ambala
42.	Dr. Jayant Mehta	Family Physician	Maharashtra Mumbai
43.	Dr. S P Kakarmath	Family Physician	Maharashtra. Kalyan. 421301
44.	Dr. Kumuda Praful Dalal	Family Physician	Mumbai
45.	Dr. Priti Bhargava	Family Physician	Maharashtra Mumbai
46.	Dr. B.M Nayak	GP	Mumbai
47.	Dr. Sharmeinbarmare	Obesity Consultant	Maharashtra Mumbai
48.	Dr. Sailakshmi Sivaram	Pediatrics	Tamil Nadu
49.	Dr Smita Jnanesh Thacker	Family Physician	Mumbai , Maharashtra
50.	Dr. Preeti Lata Rai	Pediatrics	Uttar Pradesh ,Bareilly
51.	Dr. Tapasvi Puwar	Preventive And Social Medicine	Ahmedabad Gujarat
52.	Dr. Komal Prasad Kushwaha	Pediatrics	Gorakhpur, Up
53.	Dr. M Devi	Obstetrician And Gynecologist	Tamil Nadu
54.	Dr.Lakshmiudayshanker	MBBS	Telangana
55.	Dr Bhairavi Shukla	Family Physician	Maharashtra
56.	Dr Anurag Singh	Paediatrics	Rajasthan
57.	Dr S Vadivel Md	Physiology	Tamil Nadu
58.	Dr. Kumaradevinamasivayam	Paediatrics	Tamil Nadu
59.	Dr Geetha R	Anaesthesiology	Tamil Nadu, Chennai
60.	Dr. Pawan Kumar	Pediatrics	Haryana
61.	Dr. Mita	B.H.M.S	Maharashtra Mumbai
62.	Dr. Maulin Shah	Nephrologist	Anand,Gujarat
63.	Dr. Apashchimsuganchandbaranth	M.D. Ayurved	Malegaon , Maharashtra
64.	Dr. Satish Dharurkar	Intensivist, Anaesthesia	Maharashtra
65.	Dr. Tanna Jitendra Arvindbhai	Forensic Medicine	Gujarat
66.	Dr Ila Thakrar	Pathology	Gujarat Surat
67.	Dr. Shylaja Devi Purushothaman	Obstetrician	Tamil Nadu
68.	Dr. Prathima Kini	Pathologist	Karnataka
69.	Dr. Sushama Vale	Public Health	Maharashtra
70.	Dr Umesh Kapil	Public Health Nutrition	New Delhi

71.	Dr Hansa K Bheda	MD (Obg)	Maharashtra And Mumbai
72.	Dr. Vipin Roach	Paediatrics	Himachal Pradesh
73.	Dr. Mohan Rao	Public Health	Karnataka, Bangalore
74.	Dr Regi George	Anaesthesiology	Sittilingi, Tamil Nadu
75.	Dr Lalitha Regi	Gyneacology	Sittilingi, Tamil Nadu
76.	Dr. Jerry George	General Surgery	Kerala
77.	Dr. Kamlesh	MD	Gujarat
78.	Dr. Darshana Chheda	Sonologist	Miraroadthane, Maharashtra
79.	Dr. Venketesan.R	Ophthalmology	Tamil Nadu
80.	Dr.S.Anand	Anaesthesiology	Tamilnadu.Tiruchirapalli
81.	Dr. Shivanand Nayak	Family Practitioner	Girgaon, Mumbai, Maharashtra
82.	Dr. Kishore Jumani	General Practitioner	Maharashtra
83.	Dr Alpa Thakkar	Family Physician	Mumbai, Maharashtra
84.	Dr. Hemali Soni	D. H.M.S	Dahisar Mumbai Maharashtra
85.	Dr. Malathi V	Radiologist	Tamil Nadu
86.	Dr. Hemali Soni	Family Physician	Maharashtra Mumbai
87.	Dr. Sumalatha Naitham	General Medicine	Thelangana
88.	Dr. Rekha A Patel	Family Physcian	Maharashtra, Mumbai
89.	Dr. Vimochana K	Pediatrics	Karnataka
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91.	Dr Nikhil Kharod	Pediatrics	Gujarat
92.	Dr. Zainee Chowdhary	Obg	Mumbai, Maharashtra
93.	Dr Naveen Kini	Pediatrician	Bengaluru, Karnataka
94.	Dr. Prakash Vaishnav	MD Ped	Gujarat
95.	Dr. Sangeeta Rani	Paediatric	Delhi
96.	Dr. Omesh Khurana	Paediatrics	Bhilai : Chhattisgarh
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100.	Dr Jeethan Bendoor	General Practitioner	Maharashtra, Thane
101.	Dr. Mili Joshi	Paediatrics	Maharashtra, Mumbai
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103.	Dr. Namita Zaveri	MBBS, FCGP	Maharashtra
104.	Dr Rajwant Singh Viridi	General Practitioner	Maharashtra Mumbai
105.	Dr. Nimish Shukla	Family Practice	Maharashtra
106.	Dr. Rajadurai R	MBBS	Tamil Nadu
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108.	Dr. Suryakant Pandit	Diabetic Care Physician	Vasai Road West
109.	Dr. Himanshu Kodyatar	MBBS	Gujarat Junagadh
110.	Dr. Modi Vijay Jivanlal	Family Physician	Maharashtra
111.	Dr Shubha Badami	Pediatrics	Bangalore Karnataka
112.	Dr. Asha Doddamane	Child Specialist	Bangalore

	Benakappa		
113.	Dr. Priya Shivalli	Pediatrics	Karnataka, Bangalore
114.	Dr. Gopalakrishna Mithra	Paediatrician	Hubli,Karnataka
115.	Dr Sunita S Vernekar	Pathology	Karnataka
116.	Dr. Chiranjeevi Y A	Peadiatrician	Karnataka
117.	Dr. Praveen G	Surgeon	Karnataka And Bengaluru
118.	Dr. Rashmin Patel	MBBS	Malad Maharashtra
119.	Dr. Kanniahgari Kesavulu	Child Health	Hindupur,Andhra Pradesh
120.	Dr. Dinesh Khosla	Pediatrics	Haryana
121.	Dr. Geeta Karambelkar	Pediatrics	Pune, Maharashtra
122.	Dr Neetika Jain	Pediatrician	Chhattisgarh, Raipur
123.	Dr. Sudhindra Mokashi	Pediatrician	Karnataka
124.	Dr Jayant Shah	Pediatrics	Nandurbar, Maharashtra
125.	Dr Ajay Kumar Saraf	Pediatrics	Jabalpur Mp
126.	Dr Shaila Bhattacharyya	Paed Endocrinologist	Bangalore Karnataka
127.	Dr Ravishankara M	Pediatrician	Karnataka
128.	Dr. Shashibhushan	Pediatrics	Karnataka &Bangalore
129.	Dr. Sneharoopa Pujar	Pediatrician	Karnataka
130.	Dr. Femine Rajiah	Pediatrics	Karnataka
131.	Dr. Jagdish Chinnappa	Pediatrics	Bangalore
132.	Dr. Purushotham Dr	Pediatrics	Karnataka, Madikeri
133.	Dr Bageshreedekar	Pediatrician	Ravet, Pune, Maharashtra
134.	Dr. Prakash Krishnamurthy	MD(Paediatric)	Karnataka
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138.	Dr. Prasanna Kumar	Pediatrician	Karnataka And Chintamani
139.	Dr. T Satish Murthi	MBBS	Tamilnadu
140.	Dr. Rajan Babu P K	Anaesthesiology	Kerala
141.	Dr. R Geetha	Anatomy	Thiruvananthapuram
142.	Dr. Savitha Mahesh	Infertility	Karnataka
143.	Dr Mb Ramamurthy	Community Medicine	Bangalore
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145.	Dr. Karthik K H	MBBS	Karnataka, Davanagere
146.	Dr. Nitin Gandbhir	Family Practitioner	Mumbai Maharashtra
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148.	Dr. Sanket P. Sheth	M.D. (Internal Medicine)	Anand, Gujarat
149.	Dr. P.Vijayan	Anaesthesia	Tamil Nadu
150.	Dr. Sgraveendranath	Paediatrics	Kerala, Attingal
151.	Dr. Bagavathy Murugan	ENT	Tamil Nadu
152.	Dr. R.S.Dahiya	Surgery	Haryana, Rohtak



153.	Dr. G.V.Sivslingam	Surgery	Salem Tamilnadu
154.	Dr. Sunita Manglik	Family Physician	Maharashtra, . Mumbai
155.	Dr. Adithya Pradyumna	Community Health	Karnataka
156.	Dr. Anthony Desa	Internal Medicine	Maharashtra
157.	Dr. Sukumar Arulprakasam	Ortho	Tamil Nadu
158.	Dr. Srinivasa Raghavan R	Pediatrics	Tamil Nadu, Vellore
159.	Dr. R Virudhagiri	Paediatrician	Kumbakonam Tamil Nadu
160.	Dr. Maria Bukelo	Pathology	Karnataka - Bangalore
161.	Dr. K P Pradeep Kumar	Anaesthesiology	Tamil Nadu Chennai
162.	Dr. Jayasree Satish.	Family Medicine	Mumbai