



FOOD INDUSTRIES WELFARE ASSOCIATION (Regd.)

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To,

**People's Vigilance Committee on Human Rights
(PVCHR)**

SA 4/2A, Daulatpur,

Varanasi – 221 002

(Uttar Pradesh)

Respected Sir,

Greetings from FIWA

In India, under nutrition and obesity coexist as classic case of double burden of Malnutrition. Both under nutrition and over nutrition are two faces of same coin i.e. Malnutrition. India is home to around 15 million obese children. This is second largest number after China. On average 15% of Indian children are facing some form of obesity. On the other hand, more than 45 million children in India is stunted or under-growth, which is third of world's total stunted children. Nearly half of all under – 5 child mortality in India is attributable to under nutrition.

A study conducted by Lancet Commission on comparison of Indian Diet, found out that Ultra-processed package food accounts for nearly 10% of the average total caloric intake in both rural and urban India. Urban households in high economic affluence consume almost 30% of their total daily calories from processed food. Further, Center of Science & Environment (CSE), a well-known civil society voice in India, in its survey "Know your Diet" found out high Burden of Packaged Food on the School children. The survey indicates that more than 50% children at least twice in a week consumed ultra-processed package food laced with high salt, sugar and fat like Chips, instant noodles, chocolates, ice-creams, sweetened carbonated beverages.

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The adverse health effect of unregulated ultra-processed food and drinks in under-nutrition or stunted children, who received inadequate nutrition early in their life, are more pronounced compared to such children who received adequate nutrition, due to their weak immune system. The stunted children, later in the life, if consume regularly unregulated ultra-processed food and drinks laced with high fat, salt and sugar, as replacement of common nutritious cook food, are more susceptible to obesity and later may face one or other form of non-communicable Cardio-vascular diseases like hypertension, diabetes and heart ailments.

There is general perception that prevalence of high consumption of ultra-processed food and drinks are largely among rich, urban and affluent class. It is true to some extent but scope of consumption of ultra-processed food and drinks among economically poor, rural and under-privilege section of society is growing rapidly.

There are **four factors** which are contributing high prevalence of unregulated ultra-processed food & drinks consumption in economically poor, rural and under – privilege section of society where maximum number of stunted or undernourished children belongs to. These are 1) Increasing urbanization or urban functions in smaller town and rural areas, 2) Rising income among all strata of the society 3) Less time for food preparation due to high work-stress environment and 4) lucrative marketing strategies of Food and beverage industry. These four factors contribute significantly to the food transition where affordable, convenient and hyper palatable Ultra-processed food & drinks that are ready to eat or ready to heat, take major share of daily diet of larger population in the country including economically weaker sections and migrant workforce.

In nutshell, unhealthy diet choices, often dominated by unregulated ultra-processed foods and drinks coupled with fast-paced urban lifestyle are main risk factor for growing NCDs and accelerated double burden of malnutrition among Indian children.

Front of Packet labeling (FOPL) is one such policy instrument which facilitate and in fact empower consumers taking healthier choice while purchasing package food products from the store. Often, a consumer takes less than 10 seconds to select package food products from store-not enough time to read and interpret many complicated nutrition facts panels.

Therefore, an effective **FOPL** should be:

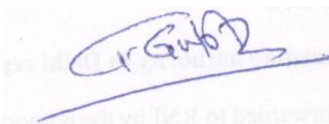
- a) Easy to understand simple warning symbol which even uneducated consumers can understand about the presence nutrient of concerns i.e. fat, salt and sugar in the product, if it is higher than threshold defined under Nutrient Profile Model which in turned prepared by Indian food scientist without any conflict of interest, on the basis of global best practices and WHO recommendation.

- b) Presented on the front of food packages (in the principal field of vision) and can be applied across the packaged retail food supply, and
- c) Have an underpinning nutrient profile model that considers presence of the nutrients of concern in the products for its NCD's impact.

A science based effective FOPL regulation shouldn't be seen against development of vibrant food processing industry. We firmly believe that food processing industry is important, in-fact critical cog in the wheel needed for strong economic growth of the country. The food processing industry is very much important for nation's economy by creating employment opportunities, generating more foreign reserve and supporting farmer's income. We believe FOPL will significantly help food processing industry in the country as market or demand shift toward healthy food, this will be **unique opportunity created in the India which help leapfrogging Indian food processing industry** and attract more foreign investment.

Since FOPL is a very new issue confronting the health and nutritional rights of children, pregnant women and lactating mothers and has its importance in realization of fundamental rights of vulnerable and marginalized section of the society, through this engaging and informative public dialogue, we are expecting to sensitize all stakeholders, particularly representatives of Political parties on the need for mandatory nutrient standards having science based threshold for fats, salt and sugar standards and food labeling regulation for protection of the nutritional right of children who are often facing double burden of malnutrition. Further, through this public dialogue, we would like to release a charter of demand on FOPL and mandatory Nutrition Standards in order to communicate the same to all relevant and important stakeholders across the country.

With regards,
Food Industries Welfare Association



(Dr.GIRISH GUPTA)
National – President
FIWA