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December 3, 2019

Re: Comments on Draft Regulations Safe Food and Healthy Diets for School Children

Thank you for issuing the Draft Notification on Food Safety Standards (Safe Food and Healthy Diets for School Children) Regulations, 2019 and seeking comments. The notification is long overdue since the Delhi High Court ruled in March 2015 to restrict junk food in schools.

We have three primary suggestions to strengthen the draft regulation.

Define HFSS better

Food high in fats, salt, and sugar (HFSS) needs to be much better defined. We require a concise and definitive description of what constitutes HFSS (which would also then define what is nutritious).

There is enough research and literature on the matter of junk food and what constitutes food that is unhealthy for children. FSSAI should incorporate some of these better definitions into the draft regulations so that they are easily understood, and therefore much more effective.

For example, the USDA's [Child and Adult Care Food Program](#) has limits on parameters of fats, sugar and salt to better define junk food, and FSSAI should also spell out how much sugar, salt and fats (per 100 grams) is allowed, and what is not.

Another definition that is rapidly gaining wide acceptance in the nutrition arena is the role of [ultra-processed foods](#), and FSSAI should utilize the recent research on ultra-processed foods to incorporate into the draft regulations.

There should also be a much more exhaustive list of HFSS foods in schedule I.

The regulations to protect our children from unhealthy diets will be meaningless if the people who provide the nutrition in our schools, the food business operators, are unclear as to what, and what is not, unhealthy food.

No Marketing to Schoolchildren

It is worrisome that the draft regulations allow for marketing of food (albeit healthy) to children in our schools. Schools are a place for education, and marketing of products has no place in it. Our schools should be commercial free zones and Section 5, which allows for marketing and advertisement of foods by food business operators to school children should be removed.

Penalties

In addition to Monitoring and Surveillance, there should be a range of penalties laid out for not complying with the regulations.

In general, the draft regulations seems to have been hastily written and ill thought out. There needs to be much more clarity on what is meant by:

Eat Right Campus (Section 4.1)

Nutrition requirements (Section 3.1)

Processed food (Schedule I)

Low-nutrition food (section 5.3)

Thank you

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