

Chapter 3

Stakeholders in the Food Safety Regulatory System in India

1. Introduction

3.1 Today, in the twenty-first century, the food supply chain is increasingly global and relies on a complex system involving farmers, growers, ingredients suppliers, food processors, food distributors, food importers, and food retailers in many different regions of the world. To achieve safety of food from farm to fork, and to reduce the frequency, impact, and severity of foodborne illness outbreaks, there have to be effective working partnerships and cooperation throughout the entire food chain (Benson 2011).

3.2 Food safety is a shared responsibility¹⁵. Five pillars of food safety viz., the food industry, government agencies, academia, consumers, and media are dependent on each other and form the basis of ensuring food safety¹⁶. However, it would be useful to broaden the stakeholder base and also include food testing laboratories, civil society. In the Indian context, at the national level Food Safety and Standards Authority of India (FSSAI) established under the FSSA, 2006 is at the center of the food safety regulatory framework working towards ensuring availability of safe and wholesome food for consumers (**Figure 4**). The Food Business Operators (FBOs) including importers are regulated through the issue of licenses/registrations at the central or state level depending upon their turnover and other factors. States also

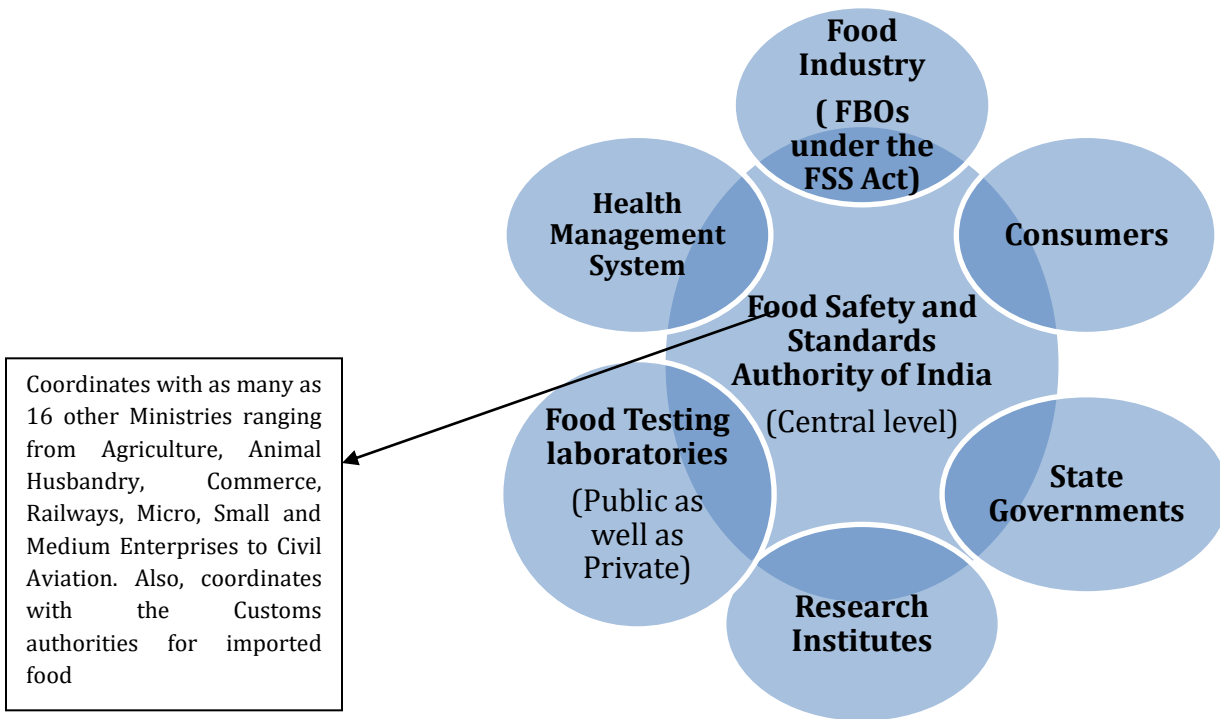
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http://www.searo.who.int/india/mediacentre/events/world_health_day/whd2015_information_leaflet.pdf?ua=1

¹⁶ <http://onlinelibrary.wiley.com/doi/10.1002/9781119238102.ch1/summary>

carry out enforcement and surveillance activities while the Food Testing laboratories play essential function under FSS Act. However, two organizations deal with voluntary standardization and certification system in the country. The Bureau of Indian Standards (BIS) looks after standardization of processed foods and manufacturers complying with standards laid down by BIS can obtain “ISI” mark. Standardization of raw agricultural produce is under the Directorate of Marketing and Inspection. It prescribes “Agmark” standards (Dudeja and Singh 2017).

Figure 4: Stakeholders in the Food Regulatory System in India



Source: Modified from FSSAI Coffee Table Book (2016), "Inspiring Trust: Assuring Safe and Nutritious Food"¹⁷

¹⁷ <http://www.nuffoodsspectrum.in/fssaidecade/pdf/FSSAI-Coffee-Table-Book.pdf>

3.2 Stakeholders

3.3 FSS Act, 2006, rules and the various regulations notified under the Act lay down the legal and regulatory framework for food safety in the country. The regulatory mechanism includes mandating licensing and registration of FBOs; setting standards; and compliance framework including monitoring and surveillance, testing of food samples, inspection and audit, training and awareness generation. A brief description of the stakeholders in the Indian Food Regulatory system is given in following sections.

A. Food Safety and Standards Authority of India (FSSAI)¹⁸

3.4 As per Section 4 of the FSSA, 2006, the Food Safety and Standards Authority of India (FSSAI) has been established in 2008 for laying down science based standards for articles of food and to regulate their manufacture, storage, distribution, sale and import to ensure availability of safe and wholesome food for human consumption. The FSSA, 2006 was operationalised with the notification of Food Safety and Standards Rules, 2011 and six Regulations w.e.f. 5th August 2011. The duties and functions of the Food Authority have been prescribed under Section 16 of the Act.

3.5 The Food Authority consists of a Chairperson and twenty-two members out of which one – third shall be women. The members of the Authority are drawn from seven Central Ministries (Agriculture, Health & Family welfare, Consumer Affairs, Commerce, Legal, Food processing, Small scale Industries); five members from State governments (to be appointed every three years, on rotation, one each in seriatim

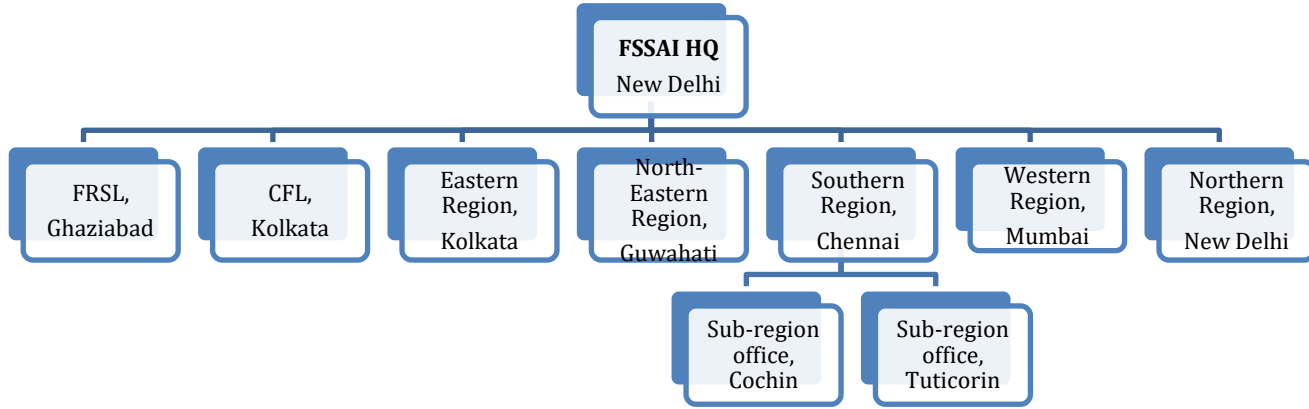
¹⁸ Information in this section is primarily drawn from the Annual Report of FSSAI (2016-17)

from the Zones as specified in the First Schedule to represent the States and the Union territories on rotational basis); two representatives from the food industry of which one shall be from small scale industries; two representatives from consumer organizations; three eminent food technologists or scientists; two persons to represent farmers' organizations; and one person to represent retailers' organizations.

3.6 Chief Executive Officer (CEO) of FSSAI is the Member Secretary of the Authority and is the legal representative of the Authority. CEO also exercises the powers of the Commissioner of food safety while dealing with matters relating to the safety of such articles. FSSAI works through 11 Divisions: Standards Division, Regulation/Codex Division, Regulatory Compliance, Quality Assurance /Surveillance Division, Imports Division, Risk Assessment and R&D Division, Food Safety and Management System (FSMS) Division, Human Resource, Vigilance and Training Division, Legal Division, Finance Division, and General Administration Division.

3.7 FSSAI also has five regional offices in Kolkata, Chennai, Guwahati, Mumbai and New Delhi. Southern office at Chennai has two sub-regional offices at Cochin and Tuticorin. Food Research and Standardization Laboratory (FRSL), Ghaziabad and Central Food Laboratory (CFL), Kolkata are under the administrative control of FSSAI. The organizational structure is as per **Figure 5**.

Figure 5: Organizational Structure of FSSAI



Source: Annual Report of FSSAI (2016-17)

(i) Central Advisory Committee (CAC) of the FSSAI

3.8 Section 11 of the FSS Act, 2006 provides for the establishment of the Central Advisory Committee (CAC), and Section 12 delineates the functions of the CAC. The primary mandate of the Committee is to advise the Authority on the work programme, prioritization of work, identifying potential risks and pooling of knowledge. The Central Advisory Committee ensures close cooperation among the Food Authority and the enforcement agencies and organizations operating in the field of food.

3.9 The Central Advisory Committee consists of two members each to represent the interests of the food industry, agriculture, consumers, relevant research bodies and food laboratories. Also, all the Commissioners of Food Safety and the Chairperson of the Scientific Committee are ex-officio Members. The Chief Executive Officer is the Chairperson of the Central Advisory Committee ex-officio. The representatives of the concerned Ministries/ Departments of the Central Government in Agriculture,

Animal Husbandry and Dairying, Biotechnology, Commerce and Industry, Consumer Affairs, Environment and Forests, Food Processing Industries, Health, Panchayati Raj, Small Scale Industries and Food and Public Distribution or government institutes or organizations and government recognised farmers' organizations are invitees to the deliberations of the Central Advisory Committee.

(ii) Scientific Committee of the FSSAI

3.10 Section 14 of the FSS Act, 2006 provides for the constitution of the Scientific Committee comprising of the Chairpersons of the Scientific Panels and six independent scientific experts not belonging to any of the Scientific Panels. The Committee is responsible for providing the scientific opinion to the Food Authority, general coordination necessary to ensure consistency of the scientific opinion and in particular with regards to the adoption of working procedures and harmonisation of working methods of the Scientific Panels. The Scientific Committee provides opinion on multi-sectoral issues falling within the competence of more than one Scientific Panels and on setting up working groups on issues which do not fall within the competence of any of the Scientific Panels. The Scientific Committee chooses a Chairperson from amongst its members.

(iii) Scientific Panels of the FSSAI

3.11 Section 13 of the FSS Act, 2006 provides for the establishment of subject-specific Scientific Panels which consist of independent scientific experts to act as the risk assessment bodies and to give their considered scientific opinion.

3.12 The following seventeen Scientific Panels were functional during the year 2016-17: (i) Panel on Functional Foods, Nutraceuticals, Dietetic Products and Other Similar Products (ii) Panel on Method of Sampling and Analysis (iii) Panel on Food additives, Flavorings, Processing Aids and Materials in Contact with Food (iv) Panel on Contaminants in Food Chain (v) Panel on Biological Hazards (vi) Panel on Pesticides and Antibiotic Residues (vii) Panel on Labelling and claims/Advertisements (viii) Panel on Genetically Modified Organisms and Foods (ix) Panel on Fish and Fisheries Products (x) Panel on Sweets, Confectionery, Sweeteners, Sugar & Honey (xi) Panel on Water (including flavoured water) & Beverages (alcoholic non-alcoholic) (xii) Panel on Oils & Fats (xiii) Panel on Milk and Milk Products (xiv) Panel on Meat and Meat Products including Poultry (xv) Panel on Cereals, Pulses & Legume and their Products (Including Bakery) (xvi) Panel on Fruits & Vegetables and their Products (Including Dried Fruits and Nuts, Salt, Spices and Condiments) (xvii) Panel on Nutrition and Fortification.

(iv) Standards Review Groups in the FSSAI

3.13 Food standards are very dynamic and keep on changing and evolving depending on various factors. There is, therefore, need to review the same continually. Keeping in view the above facts, FSSAI has constituted eight Standards Review Groups for various group of commodities viz. Oils & Fats; Milk & Milk Products; Cereals & Cereals Products; Fruits, Vegetables & their Products; Sweets & Confectionery; Meat & Fish Products; Beverages, including Alcoholic Beverages; and Nutraceuticals vide order dated 8th December 2016.

B. State Governments

3.14 India is a vast country with a population well over a billion; food safety enforcement is a herculean task. As per section 29 of the FSSA, 2006, State Food Authorities along with the Food Authority will be responsible for the enforcement of the Act. The responsibility for compliance with food standards as per Food Safety and Standards Act, 2006 and Rules and Regulation framed there under rests primarily with the State and UT Governments.

(i) State Food Safety Commissioners

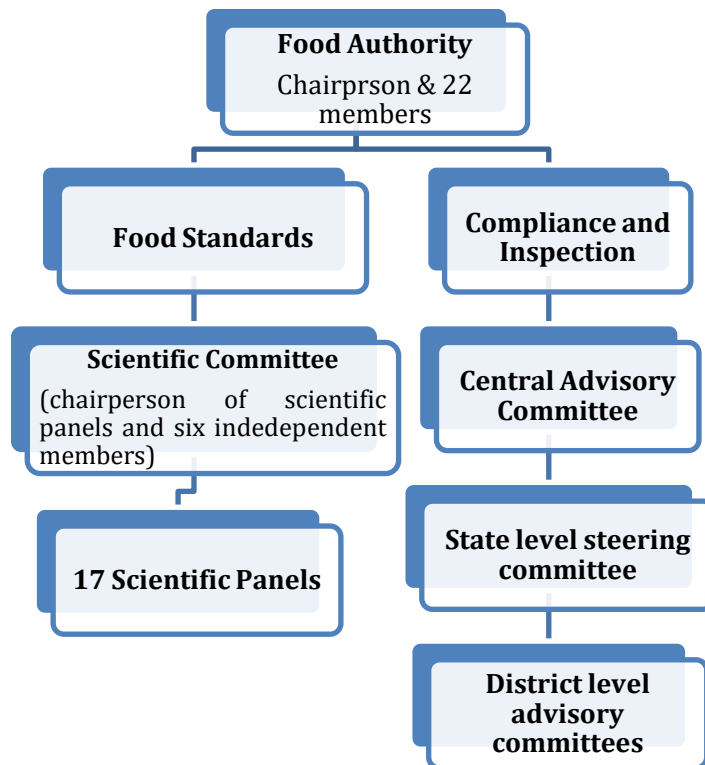
3.15 As per Section 30 of the FSSA, 2006 the state governments shall appoint Commissioner of Food Safety who is responsible for the enforcement of the Act and activities connected therein. The State/UTs are responsible for the creation and filling up of necessary posts required for the purpose. FSSAI is, however, providing some support in the form of imparting essential training and capacity building of enforcement staff of States/UTs.

3.16 All 36 States/UTs have appointed Food Safety Commissioners (FSCs). There are 680, 651 and 3031, Adjudicating Officers (AOs), Designated Officers (DOs) and Food Safety Officers (FSOs) respectively across all the States/UTs. The differentiation among States/UTs regarding size, population, food culture, languages, industry penetration, manufacturing capability, and location has its level of maturity regarding enforcement capability.

(ii) State/District level Steering Committees

3.17 State/District level Steering Committees assist, aid or advice on any matter concerning food safety in a State/UT. Most of the States/UTs have constituted the steering committees,

Figure 6: Pictorial representation of the structure of FSSAI



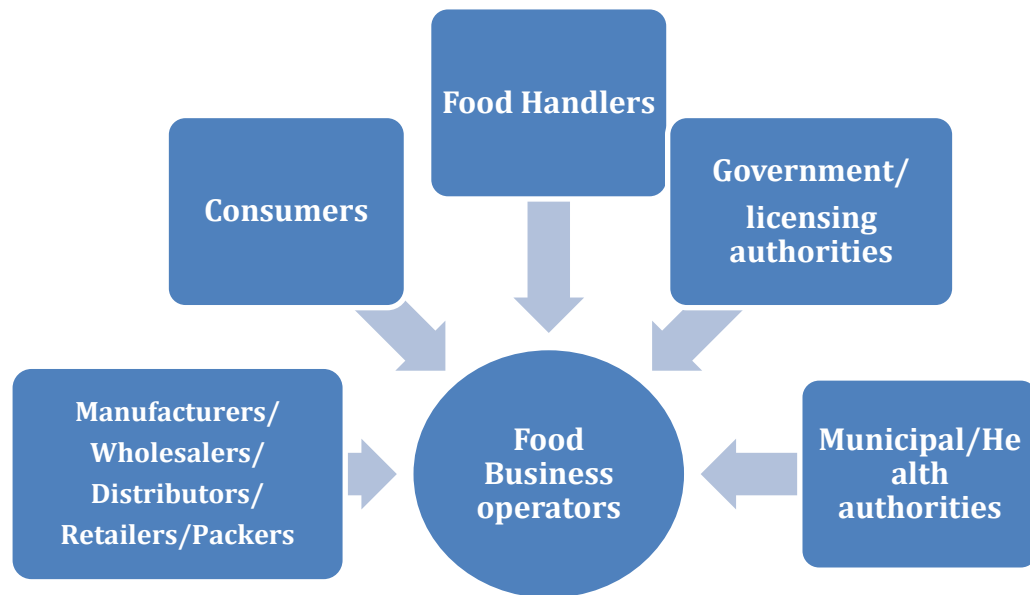
Source: Annual Report of FSSAI (2016-17)

C. Food Business Operators (FBOs) or the Food Industry

3.18 The Indian food processing Industry ranges from sophisticated state-of-art facilities to small enterprise operations producing traditional foods for the local community. In fact, the size and scalability of these processing units are also

variable. While there are many large plants, the point is that the Indian food processing sector is primarily driven by small and cottage scale units with insufficient resources¹⁹. Under the FSSA, 2006 the industry is represented by the FBOs that are defined "in relation to food business means a person by whom the business is carried on or owned and is responsible for ensuring compliance of the Act, rules, and regulations made thereunder."Chapter VI of the Act lays down the special responsibilities of FBOs, and a FBO who is accountable for food safety at any stage interacts with various agencies (**Figure 7**). As on 31st March 2017, 30,430 FBOs were issued Central and 2, 62,564 were issued State licenses.

Figure 7: Interface of FBOs with stakeholders



Source: Modified from Chapter 20 - Role of food business operators in food safety. Food Safety in the 21st Century

¹⁹ <http://www.nuffoodsspectrum.in/fssaidecade/pdf/FSSAI-Coffee-Table-Book.pdf>

D. Food Testing Laboratories

3.19 Chapter VIII of the FSSA, 2006 deals with the analysis of food and as per Section 43 of the Act, the Food Authority has to foster an ecosystem of food testing laboratories for compliance with food safety standards. In accordance with the FSS (Laboratory & Sample Analysis) Regulation, 2011, the Food Authority notifies food laboratories and research institutions accredited by National Accreditation Board for Testing and Calibration Laboratories (NABL) or any other accreditation agency to carry out analysis of food samples by the food analysts under the Act. Accreditation is a hallmark of competence and quality assurance. When a laboratory is accredited, it means that it has demonstrated technical competence in a specific area of testing and the analytical data generated from the laboratory is accurate, traceable as well as reproducible. It is of paramount importance when critical decisions have to be taken by regulatory agencies. With food testing laboratories adopting the most cutting-edge technologies and systems, regulators will have confidence in the data from an accredited laboratory and can make informed decisions based on that data.

3.20 Another vital beneficiary of accreditation is the food manufacturer himself. When a manufacturer gets his food product analyzed from an accredited laboratory, he/she is assured that the data generated is reliable, enabling him/her to comply with national and international food standards. It prevents retesting of samples and facilitates access to global markets.

3.21 Apart from notifying food laboratories, the Food Authority also finalizes manuals for methods of analysis for various food products. It has finalized 13 manuals of methods covering various food items from milk and milk products to water. Manuals for analysis of food additives, mycotoxins, pesticide residues, metals, etc. also have been finalized.

3.22 Currently, there are 232²⁰ food testing laboratories in the country under the FSSA, 2006. Following is the classification of these laboratories:

- 72 State/Public Food testing laboratories that are used for primary analysis of food samples by food analysts
- 142 accredited primary food-testing laboratories from both government and private sphere
- 18 referral laboratories notified by the Food Authority, out of which two are under the direct control of FSSAI, viz., FRSL, Ghaziabad, and CFL, Kolkata

3.23 FSSAI has also launched a scheme called “Food Safety on Wheels” (FSW), under which mobile units for food testing will be provided for reaching out to the consumers. The scheme envisages the establishment of 62 FSWs in States/UTs across the country. As on 28th January 2018, 20 States/UTs are at different stages of implementation while two state/UT(s) have not responded including the state of Uttar Pradesh²¹. Eight state/UT(s) have not provided complete information, and six could not be provided due to different reasons. Apart from conducting simple tests for common adulterants in milk, water, edible oil and other items of food of daily

²⁰ <http://foodregulatory.fssai.gov.in/food-testing>

²¹ [file:///C:/Users/agneshwar%20sen/Downloads/Food_Safety_on_Wheels_Status_25_01_2018%20\(1\).pdf](file:///C:/Users/agneshwar%20sen/Downloads/Food_Safety_on_Wheels_Status_25_01_2018%20(1).pdf)

consumption, these mobile units would also be used for awareness building around food safety, hygiene and promoting healthy eating habits in citizens at large and for conducting training and certification programme for food handlers and supervisors in food businesses, particularly petty food businesses. Also, these mobile units would help the field functionaries in the States to enhance their outreach and conduct surveillance activities even in far-flung areas²².

(i) Central Food Technological Research Institute (CFTRI)

3.24 Right from its inception in 1950, the Council of Scientific & Industrial Research (CSIR)-Central Food Technological Research Institute (CFTRI), Mysore, (a constituent laboratory of Council of Scientific and Industrial Research, New Delhi), has played a key role in using science-based systems of food analysis and quality control for improving the quality and safety of foods. The institute is currently functioning as an FSSAI notified referral food laboratory. As an appellate laboratory, it contributes to development and implementation of national food standards and regulations for domestic food business as well as imports²³.

3.25 CSIR-CFTRI is a leading laboratory for the scientific investigation related to food analysis, serving small, medium and large food industries, regulatory and academic organizations and society at large and has been certified by ISO systems of 9001, 14000 and 17025:2005. The Institute is accredited with the National Accreditation Board for Testing and Calibration Laboratories (NABL), New Delhi,

²² <http://www.fssai.gov.in/home/food-testing/Food-Safety-on-Wheels.html>

²³ <http://www.nuffoodsspectrum.in/fssaidecade/pdf/FSSAI-Coffee-Table-Book.pdf>

and there are more than 300 chemical and biological tests for foods and food products under the scope of accreditation.

E. Research Institutes

3.26 Apart from being shared responsibility, food safety is also a complex area spanning across various disciplines of primary production and use of pesticides/insecticides/veterinary drugs therein; nutrition; microbiology; public health; toxicology; packaging and storage, etc. The knowledge repository of various institutes both in the public as well as private sector, independent researchers/food scientists can contribute a lot to improving the food safety landscape in the country. There is a need to focus on research activities to keep at the forefront of emerging areas of food risks and their mitigation. Few important public research institutes/networks/information systems that have implications for food safety are as follows:

(i) All India Network Project on Pesticide Residues

3.27 The Indian Council of Agricultural Research initiated an All India Coordinated Research Project on Pesticide Residues, re-named as All India Network Project on Pesticide Residues (AINPPR), during the year 1984-85. Subsequently, the Ministry of Agriculture had initiated a Central Sector Scheme of “Monitoring of Pesticide Residues” at the national level in 2005 and 2006 with a network of 23 laboratories²⁴ across the country. These laboratories collect the samples from the nearby

²⁴<http://agricoop.nic.in/sites/default/files/Guidelines%20for%20the%20Central%20Sector%20Scheme%20Monitoring%20of%20Pesticide%20residue%20at%20National%20Level.pdf>

Agriculture Produce Marketing Corporation (APMC) markets and analyze for the possible residues of the pesticide and since 2007-8, and till about 2016 about more than 1 lakh samples of various food commodities have been analyzed.

3.28 The main aim of the project is to "To develop protocols for the safe use of pesticides by recommending good agricultural practices, based on multi-location supervised field trials" so that the residues in the food commodities remain well within the prescribed safe limits, i.e., Maximum Residue Levels (MRLs). The data thus generated is used for "Fixing MRLs" by FSSAI. Once the data is generated by supervised field trial persistence and residue data, the information is submitted to the Central Insecticide Board (CIB) and the Registration Committee, Ministry of Agriculture for evaluation. Once the data is evaluated, then it is put for the consideration of the Registration Committee. Once the Registration Committee approves the data it then goes to the FSSAI, Ministry of Health for risk assessment and fixation of the MRL. The FSSAI scientific panel on pesticide residue examines the data, and then it put up to the Scientific Committee and the Food Authority for fixation of MRLs.

(ii) Indian Institute of Toxicology Research

3.29 Indian Institute of Toxicology Research (IITR), Lucknow, a constituent laboratory of CSIR was established in 1965. It is a multidisciplinary research institute with Good Laboratory Practices (GLP) compliance certification from National Good Laboratory Practice Compliance Monitoring Authority (NGCMA), Government of India, issued concerning toxicity & mutagenicity studies

and NABL accredited facilities for biological and chemical testing. It researches in niche areas of toxicology; and food, drug, and chemical toxicology are one of the thrust areas of research & development (R&D). This group is working on: development and/or establishment of methodologies to quantify the potential toxic agent in different matrices; identification of phytochemicals/herbal preparations, which can mitigate the toxicity of above chemical moieties; to understand the mechanism of toxicity of new chemical entities; detection of GM food/crop and their safety/allergenic assessment; and establishment of guidelines for food and chemical safety for regulatory agencies.

3.30 Efforts are being made to develop novel, specific and sensitive technologies and methods for detection of food contaminants, adulterants, and microbial toxins. Scientists are also conducting toxicokinetic studies to establish a correlation between the exposures of a particular chemical entity through food and environment and resulting in lifestyle diseases like diabetes, obesity, strokes, etc²⁵.

3.31 Scientists of the Institutes have carried out studies on use of “Benzoate and synthetic color risk assessment for fast food sauces served at street food joints of Lucknow, India” (Dixit, Mishra, et al. 2008); “Usage pattern and exposure assessment of food colours in different age groups of consumers in the State of Uttar Pradesh, India” (Dixit, Purshottam, et al. 2010); Usage pattern of synthetic food colours in different states of India and exposure assessment through commodities preferentially consumed by children” (Dixit, Purshottam, et al. 2011), etc.

²⁵. <http://iitrindia.org/En/CSIR-IITR.pdf>

(iii) National Institute of Nutrition

3.32 National Institute of Nutrition (NIN) was founded by Sir Robert McCarrison in the year 1918 as 'Beri-Beri' Enquiry Unit in a single room laboratory at the Pasteur Institute, Coonoor, Tamil Nadu. Within a short span of seven years, it was converted into a "Deficiency Disease Enquiry" and later in 1928, as full-fledged "Nutrition Research Laboratories" (NRL) with Dr. McCarrison as its first Director. It was shifted to Hyderabad in 1958. At the time of its golden jubilee in 1969, it was renamed as National Institute of Nutrition (NIN). The following centers also started functioning at NIN in later years:

- Food And Drug Toxicology Research Centre (FDTRC) in 1971
- National Nutrition Monitoring Bureau (NNMB) in 1972 and
- National Centre for Laboratory Animal Sciences (NCLAS) in 1976

3.33 FDTRC is engaged in research involving food safety, drug toxicity, and safety, dietary management of chronic diseases, preclinical toxicology of drugs, biotech products developed indigenously. Total Diet Study sponsored by WHO was carried out in Andhra Pradesh to assess the risk due to exposure to contaminants through food. The focus areas of the center are: Food borne illness, Chemical contaminants in foods, Mycotoxins, Fluorosis, Lathyrism, Pesticides toxicology, Dietary management of chronic diseases, Diet and disease, Lead toxicity, Herbal medicine, Preclinical toxicology testing²⁶. Various other divisions of the Institute like the Food

²⁶ <http://ninindia.org/fdtrc.htm>

Chemistry, Micronutrient research, Lipid research, etc. are also working in the areas that have a close association with food safety.

3.34 Scientists from the Institute have worked in different areas of food safety ranging from risk assessment of synthetic colours (Rao and Sudershan 2008), FBD(Bhat and Rao 1987) to food labeling(Vemula, Gavaravarapu et al. 2014).

(iv)Health Management System in India²⁷

3.35 A number of health management systems are working in India and can be categorized into:

Performance reporting portal

- National Health Mission launched Health Management Information System (HMIS)
- National and State Health Programme portals

Disease Surveillance portal

- Integrated Disease Surveillance Programme (IDSP)
- National Vector Borne Disease Control Programme (NVBDCP)

Electronic Medical Record

- Mother Child Tracking System
- Reproductive Child Health Register

Clinical Decision Support System (CDSS)

- Radio-diagnostics and laboratories

Computerized Physician Order Entry

- Secondary and tertiary care private institutions

²⁷ Based on the lecture given by Dr. Sanjay M Mehendale, ADG, ICMR in 43rd APPPA

- Few government institutions

3.36 Several of these systems like the IDSP, HMIS, and CDSS can be a useful source of information for the disease landscape in the country, mainly foodborne diseases.

(a) IDSP under National Centre for Disease Control

3.37 The National Centre for Disease Control (NCDC) had its origin in Central Malaria Bureau, established at Kasauli (Himachal Pradesh) in 1909, which after the expansion was renamed in 1927 as the Malaria Survey of India to cater the need for malaria control in British India. The organization was shifted to Delhi at its present location at 22-Shamnath Marg; Civil Lines in 1938 and called the Malaria Institute of India (MII). The Directorate of National Vector Borne Disease Control Programme (NVBDCP) is also located on the same campus. The erstwhile MII was renamed as National Institute of Communicable Diseases (NICD) on drastic reduction achieved in the incidence of malaria in independent India. The function of the Institute included the control, elimination and eradication of the communicable diseases using multi-disciplinary integrated approach through capacity building of health workforce and operational research in various aspects of infectious diseases with the help of States and Union Territories. Surveillance of communicable diseases also formed a part of its activities.

3.38 With the growing need to work for prevention and control of non-communicable diseases and to work on health implications of environmental factors, climate change and occupational exposure, the scope of NICD has been

expanded and has been renamed as National Centre for Disease Control (NCDC) on the occasion of its 100 years existence in 2009²⁸.

3.39 Integrated Disease Surveillance Programme (IDSP) of NCDC was launched with World Bank assistance in November 2004. The programme continues under National Health Mission with the objective to strengthen/ maintain decentralized laboratory-based IT-enabled disease surveillance system for the epidemic-prone disease to monitor disease trends and to detect and respond to outbreaks in early rising phase through trained Rapid Response Teams (RRTs). Under the programme, surveillance units have been established in all districts of the country. More than 2000 outbreaks are detected and responded to by district/States annually. Aggregate analysis of IDSP data from 2011-15 shows food-borne outbreaks together with acute diarrhoeal diseases constitute nearly half of all reported outbreaks under IDSP for the period 2011-16. NCDC is also designated for International Health Regulation (IHR) implementation²⁹ as the National focal point of Govt of India. It convenes the meeting of IHR stakeholders including FSSAI annually to update India's status of IHR core capacities implementation.

(b) Health Management Information System (HMIS)

3.40 Health Management Information System (HMIS) is defined as “a tool which helps in gathering, aggregating, analyzing and then using the information generated by taking actions to improve the performance of health systems.” HMIS Portal was launched on 21 October 2008, and it is an initiative undertaken within the National

²⁸ <http://www.ncdc.gov.in/writereaddata/mainlinkfile/NCDCIntroduction2017.pdf>
<http://www.ncdc.gov.in/writereaddata/linkimages/NewsletterVolume7Issue35835187131.pdf>²⁹

Rural Health Mission (NRHM). It helps to convert local health data into useful real-time information, management indicators and trends which can be displayed graphically in the reports. It is primarily a tool for policy and strategy making. It is useful for assessing the progress of national health programmes and the information can be used in the food regulatory system too for risk assessment and management.

F. Consumers

3.41 According to FSSA, 2006, a consumer means "persons and families purchasing and receiving food in order to meet their personal needs." In the food safety ecosystem, the consumers are the most vulnerable as they repose trust and faith in the system³⁰. All they know is that there's a regulatory body and they put faith in that body expecting it to ensure food safety for all. In the present scenario, there has been a phenomenal growth in processed packaged foods, and the consumer is looking for healthy, hygienic and nutritious food. Today a consumer has the "right to choice" but the "right to safety" is yet to be safeguarded³¹.

3.42 FSSAI has launched a number of initiatives to address consumer concerns including development of FSSAI App; web-based portal for lodging consumer concerns; and a number of booklets targeting: safe food at home (pink book),

³⁰ http://www.nuffoodsspectrum.in/fssaidecade/article-page/NFS_57ceca82a96b61.05989969/5/fssai-panel-discussion-1-food-safety-a-shared-responsibility

³¹ *ibid*

parents/teachers/students (yellow book) and for testing adulteration (Detect adulteration with rapid tests)³².

3.43 It is mandatory that every package of food intended for sale should carry a label that bears all the information required under FSS (Packaging and Labelling) Regulation, 2011. Food package must carry a label with the information on Common name of the Product, Name, and address of the product's Manufacturer, Date of Manufacture, Ingredient List with additives, Nutrition Facts, Best before/ Expires on, Net contents in terms of weight, measure or count, Packing codes/Batch number, declaration regarding vegetarian or non-vegetarian, and country of origin for imported food.

3.44 For consumers to assert their right to the safe food, they will have to shed the culture of silence, be proactive, demand safe food from the FBOs sometimes even at the cost of paying a little higher. Along with good agricultural practices, good hygienic practices, there should also be good consumer practices.

³²<http://www.fssai.gov.in/home/capacity-building/FSSAI-Books.html>