



ALLIANCE FOR SUSTAINABLE & HOLISTIC AGRICULTURE (ASHA)

Food • Farmers • Freedom

To:

1. The Chairperson,
Food Safety & Standards Authority of India (FSSAI).
2. The Chief Executive Officer,
Food Safety & Standards Authority of India (FSSAI).

Dear Shri Ashish Bahuguna and Shri Pawan Aggarwal,

Sub: Objection to FSSAI's undue haste in wanting to regulate organic foods but total inaction and abdication of responsibility when it comes to unsafe foods like GMOs – reg.

Greetings!

This is to place on record the objection of many civil society organisations and concerned citizens around the country about the fact that FSSAI is exhibiting undue haste in wanting to bring in regulations with regard to organic foods (which is potentially safer food compared to normal food), but has done nothing to protect citizens' health from unsafe foods like GM foods (which is potentially unsafe food compared to normal food). We understand that the primary mandate of FSSAI is to regulate unsafe food, and not safe food!

We are aware that FSSAI is seeking to notify regulations with regard to organic foods, mainly with the help of APEDA in the Commerce Ministry which has no expertise in food safety matters.

It is reported that FSSAI wants to get into regulation of organic foods so that fake organic produce being passed off as organic can be curbed. While fake organic produce coming into the market with misleading claims is indeed a matter of concern for consumers, **such fake produce is not a matter of food safety *per se*** but a matter of consumer rights being protected against being cheated. Fake organic does not make food any more unsafe than what is already being consumed by citizens of this country in the form of chemical residues and various other harmful additives. Such fake organic is expected to be discovered by the Authority through its routine sampling and testing mechanisms and FSSAI should explain why it thinks more regulation than its inspection systems currently in place are needed for organic.

In fact, we believe that organic food at this stage does not require any extra regulation than what is being applied to normal food, which is supposed to ensure that any kind of food crossing prescribed limit of hazardous chemicals should not be sold in the market. Organic sector will certainly be happy to abide by these regulations.

These other unsafe foods should in fact be regulated and labeled in a manner that all the harmful residues are listed clearly on the product. While failing to regulate such unsafe foods, FSSAI seems to be overly keen on

regulating the nascent organic farming sector in this country. We believe the Food Safety Authority should be actively thinking about how to support the spread of organic farming so that food production itself becomes safer, fulfilling the mandate of the Authority to a substantial extent.

Organic production is getting a little fillip for the very first time at the Union Government level through the introduction of a few large schemes in the recent past. This is a sunrise sector that needs to be encouraged to evolve, and not curbed through unneeded regulation. Meanwhile, a few consumer surveys/polls with regard to GM foods clearly show that consumers, where aware, are concerned about transgenic foods coming into the food chain without their knowledge and informed choices, nor with any long term assessment of safety.

FSSAI has consistently refused to pick up its responsibility with regard to GM foods' regulation in terms of assessment of safety as well as enforcement of labeling. Representatives from our side engaged with FSSAI twice on this matter, including after the Consumer Affairs department which has passed labeling requirement for GM foods under the Legal Metrology Act expressed its implementation constraints and sought the help of FSSAI for sampling and testing. However, we drew a blank with the FSSAI constantly saying that the GEAC is looking into GM regulation. If that is the case with GM foods, the same should apply to organic foods too – there are others who are regulating and promoting and FSSAI should not get involved in this sector either.

FSSAI needs to explain its reasoning as to why it is pushing ahead with organic regulations and not doing anything about regulating unsafe foods like GMOs.

We write to you to urge you to re-order your regulatory priorities and please ensure that you regulate GMOs and products thereof from a food safety perspective thoroughly first, before regulating organic produce. It is important that the Food Safety Authority indicates to citizens that it is serious about ensuring food safety by doing so, rather than get into wrongly prioritized areas of regulation.

Sincerely,



Kavitha Kuruganti
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