

Transforming Food Safety in India

Capacity Building and Behaviour Change for all Stakeholders

Training, education and information campaigns are needed to increase the food safety knowledge and awareness of both consumers and food suppliers.

To enable food businesses in both the organized and unorganised sectors to comply with GMP and GHP as mandated by the law, the Food Safety Training & Certification (FoSTaC) programme has been created. This is a unique, organically growing initiative to train Food Safety Supervisors (FSS), with the objective of ensuring at least one trained and certified FSS in every business premise. At present, there are 143 Training Partners, 1497 Trainers who have conducted 3622 Trainings, training 98774 FSS across the country.

Professionalization of food inspection and surveillance staff is being strengthened through better induction and training programmes. Enforcement staff is being groomed to fill the knowledge gap of food business operators by providing assured advice especially to small and medium sized enterprises, helping the businesses interpret the Act and its requirements and sharing operationally feasible suggestions to implement the various provisions of the Act.

A series of initiatives have been put in place to trigger demand for safe and wholesome food under the 'Eat Right India' movement. The Safe and Nutritious Food (SNF) initiative is focused on promoting safe and healthy diets. The Eating Healthy Campaign is focused on reduction of salt, sugar and fat and elimination of trans-fats in the diet to prevent NCDs.

Consumption of fortified foods to prevent micronutrient malnutrition is also being promoted. Consumer education and advocacy is done through networks of outreach partners such as frontline health workers at the grassroots level and Professional networks (Medical/ Dietetics/ Nutrition Associations) at the community level.

Summary

Overall, India has adopted an approach of “doing more with less”, through strategic utilization of available resources with holistic thinking. Instead of creating a mega-organizational structure with large funding, five simple guiding principles govern the working of India's food authority. Firstly, FSSAI has co-created a shared vision for improved food and nutrition for the country by working with all its key stakeholders as change agents. Secondly, it has developed multiple partnerships with institutions and organizations across the board to benefit from ideas and support from all. Thirdly, most of the processes and practices have been standardized to achieve scale in order cover the entire country as big as India. Fourthly, the FSSAI is leveraging technology to enhance reach, effectiveness and ensure transparency. And, finally, the FSSAI has created a positive work ethos and culture.

This has helped India 'to achieve more with less'. India's Food Authority is a small, yet nimble, modern and effective organization that is building 'New India' enabling citizens to have safe and nutritious food, and live with human dignity as productive members of society. India's model could be instructive in establishing food safety systems in other low and middle-income countries that are looking for suitable replicable models.



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TRANSFORMING Food Safety in India



The Food Safety and Standards Authority of India (FSSAI) was established in 2008 under the Ministry of Health and Family Welfare in pursuance of the Food Safety and Standards (FSS) Act, 2006. This Act consolidated several fragmented legislations and brought them under a single umbrella, making FSSAI the apex authority on all matters of food safety. From a narrow focus on preventing food adulteration, the mandate of FSSAI was expanded to ensuring safe and wholesome food for over 130-crore Indians and across the supply chain right from post-harvest to consumers.

Over the past few years, the Food Authority has redefined institutional roles from adversarial to collaborative. This has been accomplished by enabling self-compliance by providing information, training and capacity building, incentives and interventions to motivate and leverage investments and actions by value chain actors. The enforcement of the Food Safety and Standards (FSS) Act, 2006, has been decentralized to the 36 States and Union Territories (Uts).

The Food Authority is a 23-member body that represents various interest groups including different ministries of the government. To fulfil its huge mandate, FSSAI is guided by a Central Advisory Committee, which has representation from state food authorities, food industry and consumer organizations. Scientific opinion and advice is provided by the Scientific Committee, which in turn is informed by various subject-specific scientific panels.

Being a lower-middle income country in the transitioning phase of the food safety lifecycle, India is experiencing rapid demographic and dietary change, giving rise to dynamic and visible food safety hazards. Because of greater influence of the media, rising incomes and exposure to a wide array of information, consumers have become ever more concerned about food safety. In the backdrop of growing interest about food safety and meeting rising aspirations of the people around healthy diets, the Food Authority in India has adopted the following core principles to safeguard public health:

- Strategic integration of food safety and nutrition into the national agenda
- Risk analysis and independent scientific advice for standards setting
- Harmonization with international standards
- Technology enabled enforcement, inspection and surveillance
- Strict border controls for food imports
- Stronger network of food testing laboratories
- Training and education
- Partnerships and international cooperation

Standards, Regulations & CODEX

Food Safety and Standards Rules and 6 key Regulations were notified in 2011. Since then, FSSAI has notified almost all technical standards and regulations. Robust institutional mechanism for setting standards in the form of 19 Scientific Panels and a Scientific Committee have been established. There are 8 Standards Review Groups and 9 Technical Panels which formulate guidance documents, Code of Practices and Inspection Metrics.

Vertical standards have been developed for more than 130 food products specifying more than 150 quality parameters. Harmonization of horizontal standards with international standards has been completed. For example, Standards for additives have been harmonized with Codex. The process to draft standards to cover new products, ingredients, additives etc (previously not covered) is currently underway: organic foods, alcoholic beverages, amendments related to MRLs of pesticides, tolerance limits for antibiotics and pharmacologically active substances, novel food products or ingredients or those processed with novel technology, new processing aids including enzymes and articles of food and food ingredients consisting of or isolated from microorganisms.

India is a member of Codex since 1964. Within India, FSSAI has been designated as the National Codex Contact Point (NCCP). With its active role in the region, India has also been appointed as current coordinator for Coordinating Committee for Asia till 2020. FSSAI has played an active role in supporting the codex activities through participation in electronic working groups, submission of monitoring and/or occurrence data and providing inputs on standards and guidelines at various stages of development.

Licensing, Enforcement & Compliance

FSSAI ensures enforcement through a network of Food Safety Commissioners and Food Safety Officers in the states. Transparency is ensured through an online licensing and registration system, a digital metrics-based inspection system and by streamlining processes to reduce the burden on food businesses. By leveraging technology, FSSAI has ensured ease of doing business.

Adoption of digital/e-governance initiatives such as FLRS (Food Licensing & Registration System), FoSCoRIS (Food Safety Compliance through Regular Inspection and Sampling) have enhanced the efficiency and effectiveness of the licensing, registration and surveillance process.

This has also led to a dynamic database of licensed and registered FBOs. Rationalization of documentation requirements for licensing & registration has been undertaken with a view to address operational redundancies.

Inclusion of e-commerce operators under the ambit of licensing regulations has been a much-welcomed initiative. Risk-based inspection approach (including metrics) has been adopted for intelligent and targeted utilization of resources. 24 audit agencies have been recognized to supplement the field enforcement staff and conduct third party audits of FBOs.

Food Testing and Surveillance

As an integral part of the food regulatory set-up, the food testing ecosystem has to serve the following major functions -

- 📌 **Analyse and test foods/food commodities (domestic as well as imported) against the prescribed quality and safety parameters and enable enforcement of food laws/regulations**
- 📌 **Assist in market surveillance activities to ensure that the food products are sold in compliance with the standards prescribed**
- 📌 **Be a part of the risk assessment framework including those during food related incidences and in turn aid in development of food standards or guidance documents**
- 📌 **Be an integral part of the network to harmonize, develop or validate testing methods**
- 📌 **Create awareness about food testing and food standards, especially among the consumers**

Regulatory provisions have been put in place for recognition and notification of laboratories which has encouraged the network of labs to reach 266 labs as of date. There is effective geographical coverage and the private sector has been involved to augment the testing facilities. 13 National Reference Laboratories have been identified for the purpose of method development and validation, training, capacity building and R&D.

Laboratory information management system (INFoLNET) has been institutionalized for the purpose of knowledge management, traceability and efficient communication across labs.

To address data accuracy, validity and reliability, effective mechanisms have been put in place for method harmonization and verification for e.g., method review group, scientific panel; approval system for conventional and rapid methods; commodity specific methods manual(s); collaboration with method setting bodies like AOAC.

Analytical sciences being a highly technical field requires periodic capacity building programs. Several capacity building programmes have been conducted to cover basic, intermediate and advanced analysis requirements. 45 training programmes conducted so far with 1109 participants trained. Of these, 143 participants were trained on NABL awareness, 692 participants on Good Laboratory Practices, 274 in Specialized areas such as Mycotoxins, Pesticide Residues, Veterinary Drug Residues etc. Strengthening of analytical workforce is being done through regular conduct of Food Analyst Examination (FAE) and Junior Analyst Examination (JAE). 5 FAEs conducted so far and 391 Food Analysts have been certified. 2 JAEs conducted so far and 184 Junior Analysts have been certified

Over the last few years, FSSAI has undertaken strategic and sustainable investments in the laboratory ecosystem. FSSAI's own laboratories, National Food Laboratory (Ghaziabad) and National Food Laboratory (Kolkata) have been renovated to be world class facilities. State food laboratories have also been upgraded with infrastructure as well as technical manpower.

Partnerships and scientific cooperation are being utilized to set up world class facilities for laboratory training, R&D and to aid in surveillance activities. Some of the partners include GFSP, Thermofischer & Merck involvement in setting up training facilities (ITC-FSAN, Food Safety Solution Centre & C-MAT)

Large scale-commodity surveillance activities have been undertaken for the purpose of risk assessment; e.g. Milk survey 2018 and survey of packaging materials. Consumer engagement initiatives such as Detect Adulteration with Rapid Test (DART) & Food Safety Magic Box have been taken up to drive the core philosophy of food safety being a shared responsibility.

An innovative concept of a mobile food-testing laboratory called 'Food Safety on Wheels' has been introduced for the purpose of testing, training and awareness generation.

Apart from conducting simple tests for common adulterants in milk, water, edible oil and other items of food of daily consumption, these mobile units are also being used for awareness building around food safety, hygiene and promoting healthy eating habits in citizens at large and for conducting training and certification programmes for food handlers and supervisors in food businesses. About 41 mobile labs have been provided to states and another 19 would soon be commissioned.

Safety of Imported Food

Facilitating trade while ensuring the safety of agri-food imports requires adhering to practices and principles that are consistent with Codex Alimentarius Commission guidelines. FSSAI has initiated a risk-based management system (RMS) for food imports. Based on the compliance history of importers, only 5% low risk items and 25% high risk food items are referred by Customs to FSSAI for examination and clearance.

Growing agri-food imports pose new challenges for the effective management of food safety in LMICs, especially when these imports are from other LMICs that themselves have weak food safety management systems or whose trade is carried out through informal channels. FSSAI has therefore strengthened its presence in 20 locations including 6 ports for stricter border controls and clearance of food imports. An IT-enabled system has been built, called the Food Imports Clearance System (FICS) which is regularly benchmarked with learnings from international best practices.

For imports clearance, there is risk-based inspection, sampling and testing and rectification of labelling defects. A provisional NOC is given for perishables and packaged food items. There is a Single Window Clearance for Imports for ease of doing business. Testing of samples is done in food labs near the Points of Entry (PoE). Food labs in neighbouring countries of Bhutan and Bangladesh have been recognised to facilitate imports. There is a provision for review and appeal in respect of rejected consignments. Further, the surveillance of imported food in the market is also undertaken.