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Proceedings of the FICCI Conference on

ROLE OF PRE-PACKAGED FOODS IN DIETARY GUIDELINES FOR INDIANS 2024

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Background

The FICCI Conference on the Role of Pre-Packaged Foods in Dietary Guidelines for Indians 2024 was organised in response to the updated ICMR NIN Dietary Guidelines 2024. These guidelines were introduced to address the evolving dietary patterns and nutritional needs in India, with a particular focus on combating the dual challenges of malnutrition and rising obesity rates. The guidelines emphasize the importance of whole grains, fruits, vegetables, and legumes in the Indian diet, alongside the need to reduce the consumption of high-fat, high-sugar, and high-salt (HFSS) foods. They also introduce new concepts such as "My Plate for the Day," which visually represents the recommended proportions of various food groups, and provides nutrient-specific recommendations, including safe upper limits for branched-chain amino acids (BCAAs) and guidelines for food safety.

The conference was a timely event that brought together key stakeholders from the food industry, government, academia, and public health sectors to discuss the implications of these new guidelines, particularly in the context of pre-packaged foods. With the increasing consumption of pre-packaged foods in India, there was a critical need to explore how these products could be aligned with the new dietary recommendations to support public health goals. The event provided a platform for dialogue on how the food industry can innovate to create healthier, more nutritious products while addressing public concerns about food safety and the nutritional quality of pre-packaged foods.

The conference highlighted the importance of public-private partnerships in driving these innovations and ensuring that nutritious, safe, and affordable food options are available to all Indians. Additionally, the event underscored the need for ongoing consumer education to help the public make informed food choices, emphasizing the importance of reading food labels and understanding the nutritional content of pre-packaged foods.

The discussions at the conference generated actionable insights that will inform future policy development, particularly in areas related to food safety, fortification, and labelling standards. The event also touched upon the importance of sustainability in the food industry, such as reducing plastic use in packaging and promoting environmentally friendly food production methods. Overall, the FICCI Conference on Role of Pre-Packaged Foods proved to be a successful attempt in holding an open dialogue on Dietary Guidelines for Indians 2024 involving academia, scientists, experts and stakeholders across.

Inaugural Session

Welcome Address

Mr. Tarun Arora, Chair, FCNE, warmly welcomed distinguished guests at the "FICCI conference on the role of pre-packaged foods in Dietary Guidelines for Indians 2024". He emphasized the need for collaboration among industry, policymakers, and the scientific community to address India's dual challenge of malnutrition and rising obesity rates. He highlighted India's unique dietary landscape, which combines traditional and modern practices. Mr. Arora noted the growing interest in reviving traditional foods and praised the government's millet mission as a key initiative for healthier diets. He also acknowledged the crucial role of FSSAI in ensuring food safety and supporting the nation's health. Mr. Arora stressed the importance of innovation in the packaged food industry to make nutritious food accessible, affordable, and appealing, aligning with ICMR guidelines. He called for a multi-stakeholder approach to developing sustainable food solutions that cater to India's diverse population. In conclusion, he urged the attendees to engage in open dialogue and collaboration throughout the conference to contribute to the achievement of sustainable development goals.

Keynote Address

Dr. Raj Bhandari, MBBS, MD; Senior Paediatrician and Govt. Advisor, delivered an engaging keynote address, sharing his experiences from paediatric care to public health advocacy. He discussed the evolution of nutrition practices in India, emphasizing the transition from therapeutic to preventive nutrition. He called on the food industry to adopt a balanced approach in product development, reducing sugar and fat content while maintaining taste and appeal. Dr. Bhandari also discussed the importance of educating consumers about the health risks associated with high sugar and fat intake. He urged the food industry to explore innovative ways to make healthier foods more palatable to the general public. Furthermore, he emphasized the need for ongoing research into the long-term effects of dietary habits on health. Dr. Bhandari concluded by highlighting the potential of public health initiatives to transform the dietary landscape in India.

Context setting and agenda for the event

Mr. Siraj Hussain, Former Secretary, Ministry of Food Processing Industries and Ministry of Agriculture and Farmers Welfare, GOI & Advisor, Food Processing, FICCI, set the stage for the conference by discussing the complexities of India's dietary habits, shaped by regional, religious, and economic factors. He outlined the dual burden of malnutrition and obesity and the role of the food processing industry in addressing these issues. Mr. Hussain emphasized the importance of the ICMR dietary guidelines in guiding the industry to create healthier food options. He highlighted the significance of public-private partnerships in driving innovation and ensuring that nutritious food is accessible to all sections of society. Mr. Hussain also pointed out the growing urbanization and changing lifestyles in India, which have led to an increased demand for convenience foods. He mentioned that women's participation in work force will result in higher demand for semi processed food. He pointed out long commuting time in big cities due to which women reach home so late that there is not enough time to cook fresh food every day. He called for a balanced approach where the food industry can cater to this demand for nutritious food, low of sugar, fat and salt, while ensuring the nutritional value of their products.

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Inaugural Address

Shri G. Kamala Vardhana Rao, IAS, CEO, FSSAI, addressed the regulatory challenges of ensuring food safety and nutritional quality in pre-packaged foods. He underscored the importance of reducing sugar content and addressing pesticide residues in food products. Shri Rao highlighted FSSAI's role in setting standards and guidelines that support public health. He also discussed the need for innovative packaging solutions to reduce the use of plastics and emphasized the significance of consumer education in promoting healthier food choices. He called for stronger collaboration between FSSAI, industry players, and consumers to achieve a safer food system. He also touched upon the importance of fortification in combating micronutrient deficiencies. In closing, Shri Rao expressed hope that the conference would lead to actionable insights that benefit both the industry and public health.

Technical Session: Presentation on
Dietary Guidelines for Indians 2024

Dr. Hemalatha R., Former Director, ICMR - National Institute of Nutrition, presented the updated dietary guidelines for 2024, emphasizing the importance of whole grains, fruits, vegetables, and legumes in the Indian diet. She introduced the "My Plate for the Day" concept, which visually represents the recommended proportions of various food groups. Dr. Hemalatha highlighted the new guidelines on the consumption of high-fat, high-sugar, and high-salt foods, aiming to curb the rising incidence of lifestyle diseases in India.

She stressed the need for a balanced diet that promotes health and well-being across all age groups. Dr. Hemalatha also discussed the significance of dietary diversity and the inclusion of traditional Indian foods in the daily diet. She pointed out the challenges of implementing these guidelines in rural and urban settings, where dietary habits can vary significantly. Furthermore, she emphasized the role of nutrition education in schools and communities to ensure the widespread adoption of these guidelines. Dr. Hemalatha concluded by urging stakeholders to work together to make these dietary guidelines a reality for all Indians.

Question: *Do we have data that shows what people are currently consuming, including the proportions of food consumed at home versus outside, and the intake of processed foods? Specifically, how does the actual consumption of sugar, salt, and fats from these sources compare to the recommendations?*

Answer: Dr. Hemalatha indicated that approximately 70-80% of calories are derived from refined cereals, with vegetable and fruit intake significantly below recommended levels. Ideally, at least 40% of calories should come from vegetables and fruits.

It is important to note that the available data is somewhat outdated, with rural data from 2012 and urban data from 2016. However, the National Institute of Nutrition (NIN) is currently conducting a total diet study across all states and union territories in India. This study includes a 24-hour diet recall to provide a comprehensive overview of food intake, including home-cooked meals, outside food, and processed food consumption. The study also covers specific programs such as ICDS (Integrated Child Development Services) and MDM (Mid-Day Meal) schemes. The survey is expected to be completed in a few months, with the data anticipated to be available by 2025.

Question: *Could you clarify whether the nutrient thresholds for packaged foods are based on specific dietary surveys that explore the cause-and-effect relationship between nutrient intake and health conditions? Additionally, have portion sizes been taken into account in determining these thresholds? For instance, industry data shows that certain processed foods are consumed in very small portion sizes, and the data collected might not represent the broader population but only those who consume that specific product. How have these consumption patterns influenced the threshold setting?*

Answer: The thresholds for macronutrients in packaged foods are indeed based on global dietary recommendations, which suggest that 30% of calories should come from fats, 55% from carbohydrates, and 15-20% from proteins. We also took into consideration the "My Plate for the Day" model, which estimates roughly 170 kilocalories per 100 grams of raw foods and 100 kilocalories per 100 grams of cooked foods. To simplify the application of these guidelines, we set the threshold at 250 kilocalories per 100 grams of cooked food. Although global recommendations often use portion sizes or servings, which can be somewhat confusing, we opted to standardize the thresholds to be per 100 grams of food or per 100 ml of beverages. This approach ensures that the guidelines are straightforward and applicable across various types of packaged foods, with specific limits for fat, sugar, and salt content.

Question: *On one side, branched-chain amino acids (BCAAs) are essential amino acids, but on the other hand, excessive intake of BCAAs can cause insulin resistance. Has NIN established the safe upper limit for BCAAs like leucine, isoleucine, and valine? It is important to provide guidance on what constitutes excessive intake.*

Answer: Yes, NIN has established the upper limits for each essential amino acid, including leucine, isoleucine, and valine. This information is included in the nutrient requirements for Indians and incorporated into the FAO guidelines. The upper limits were first established in the 2007 data and have since been included in the current nutrient requirements.

Question: *The consumption of alcohol is increasing at a fast rate, and state governments are benefiting from excise collections. However, the NIN guidelines do not address alcohol consumption. Additionally, in states like Punjab and Haryana, where about 70% of the population is vegetarian, and in states like Kerala and Tamil Nadu, where over 90% are non-vegetarians, is there any health data that shows a difference in lifestyle diseases, such as diabetes or cardiovascular conditions, between these populations?*

Answer: Regarding alcohol consumption, the guidelines do not categorize alcohol as food; therefore, it is not included in the dietary guidelines for Indians, which are food-based recommendations. While we advise that alcohol is not required, it is ultimately a personal choice.

As for the differences in lifestyle diseases between vegetarian and non-vegetarian populations, NIN is currently collecting health biomarkers and nutrient biomarkers across all states through nationwide surveys. While existing data shows that hypertension and cardiovascular diseases are slightly higher in Kerala, it is difficult to pinpoint specific dietary causes, such as coconut oil intake or flesh food consumption, based on epidemiological studies alone.

Question: *The previous guidelines, specify the portion guidance, such as 30 grams for cereals. International guidelines, like those from Australia, also provide portion guidance for different food groups. However, while reviewing the new guidelines, it seems that portion guidance has been removed or eliminated. Was this done for a specific reason?*

Answer: The portion guidance has not been removed; rather, it has been clarified and included in the guidelines for different age groups. The guidelines also provided detailed portion recommendations in the annexes, specifying what individuals should consume during breakfast, lunch, and dinner based on their age, including the recommended intake of fruits and vegetables. The previous guidelines were found to be somewhat confusing, leading to numerous queries from nutritionists and dietitians.

Question: *The same threshold has been applied across all kinds of foods, but the portion sizes consumed are often much less than the 100 grams used to define the criteria. How do we apply the same nutrient density threshold to all foods, considering these variations?*

Answer: The threshold is defined for nutrients, not for the food itself. The food labelling is also based on nutrient content rather than the food as a whole. For example, a particular food should contain a specified amount of fat, sugar, and salt that is the threshold. These thresholds are applied to the nutrients. fats, sugar, and salt, not to the food item in its entirety. Once these thresholds are established for nutrients, consumers can know that a food does not exceed those

limits and is safe to consume. However, if a food contains refined carbohydrates or other ingredients, consumers should be informed and aware of consuming such foods in limited quantities.

Question: *On one hand, there is a strong emphasis on reducing sugar intake, whether through food or direct consumption. On the other hand, the guidelines mention studies that highlight the harmful effects of sugar substitutes. This creates a dilemma for food companies that are trying to reduce sugar in products by using low-sugar alternatives. How should this balance be managed?*

Answer: The recommendations are not contradictory but rather complementary. While the guidelines emphasize reducing sugar intake, this does not mean that one should excessively rely on sugar substitutes. There must be control and caution with sugar substitutes as well. Food companies should exercise extra caution and choose sugar substitutes that are less harmful or do not have adverse effects. The intent is to encourage moderation in both sugar and sugar substitutes to ensure overall health and safety. Limiting sugar does not imply that it is acceptable to overconsume sugar substitutes.

Question: *How do we define complex carbohydrates? Is it based on the glycemic index, or are there other analytical parameters that we should consider?*

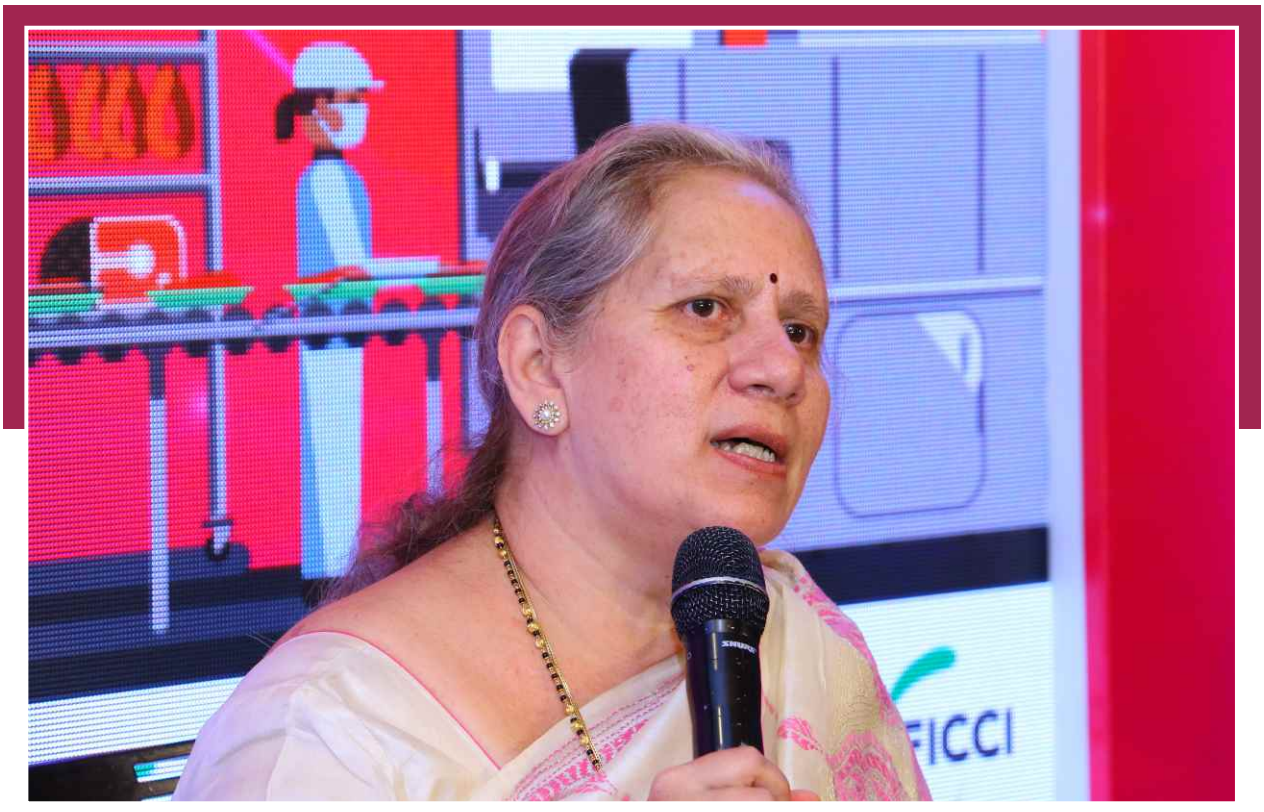
Answer: When defining complex carbohydrates, it's important not to focus solely on the glycemic index (GI). The glycemic index is a scientifically recognized measure, but it shouldn't be overemphasized because we don't typically consume single foods in isolation; we eat a variety of foods together. When we follow dietary diversity as recommended, our overall glycemic index and glycemic load will generally be well-managed. For example, fructose has a low glycemic index, but that doesn't necessarily make it healthful. Conversely, watermelon has a high GI, but the glycemic load is low, making it less concerning.

The key is to focus on dietary diversity and consuming wholesome foods. Complex carbohydrates primarily refer to polysaccharides, which include starches and non-starch polysaccharides (NSPs). Starches can break down quickly into glucose, similar to sugar, especially if they are highly refined. On the other hand, NSPs, which include soluble and insoluble fibers, are very beneficial for health. These fibers are abundant in whole grains, pulses, and beans, which are integral to the diet. Therefore, consuming a variety of whole grains and pulses will provide a good intake of fiber and NSPs, contributing to overall health.

Question: *The Recommended Dietary Allowance (RDA) for protein, as per ICMR, is 0.8 to 1 gram per kilogram of ideal body weight. However, studies indicate that the actual protein consumption among the Indian population is only around 6 grams, highlighting a significant gap. Given that Indian dietary practices often neglect protein, and considering the lifestyle changes discussed, should we consider completely excluding external sources of protein, such as protein powders, from the diet? There are also concerns about fake protein powders, but the industry is ready to collaborate with NIN and government bodies to educate consumers on proper protein consumption.*

Answer: If we adhere to a balanced diet that includes dietary diversity, with adequate intake of cereals, pulses, beans, fermented milk, and moderate amounts of flesh foods, all our protein requirements should be met naturally. For most individuals, especially non-vegetarians who consume the recommended amounts of flesh foods per week, there is generally no need for external protein sources. However, there may be specific conditions or situations where dietary sources alone may not be sufficient, but these would primarily affect micronutrients rather than protein or amino acids. In general, for those following a balanced and diverse diet, external protein supplements should not be necessary.

Technical Session:
Food Processing for Food and Nutrition Security in India

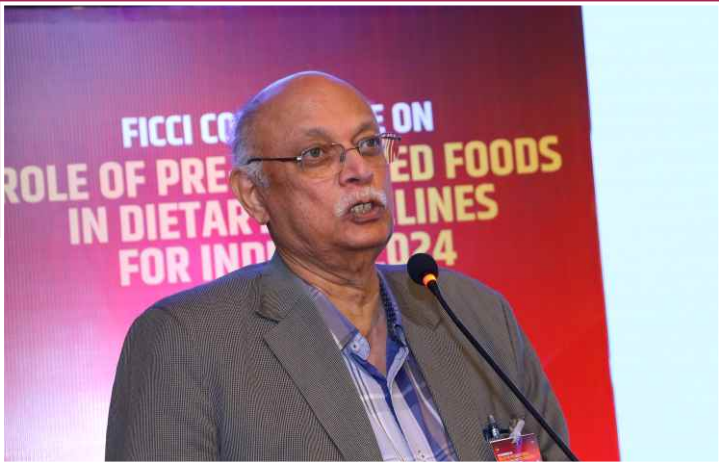


Dr. Sridevi Annapurna Singh, Director, CFTRI, focused on the role of food processing in enhancing food security and nutrition in India. She discussed the importance of innovations in food processing that retain the nutritional quality of foods while addressing issues of food safety and shelf life. Dr. Sridevi highlighted the potential of food fortification in addressing micronutrient deficiencies, particularly in vulnerable populations. She called on the industry to embrace technological advancements that can help produce healthier and more nutritious pre-packaged foods. Dr. Sridevi also addressed the challenges of scaling these innovations to reach a broader population, especially in rural areas. She discussed the importance of government support and policy frameworks that encourage innovation in food processing. Additionally, Dr. Sridevi emphasized the need for continuous research to keep pace with changing consumer preferences and health needs. She also encouraged food industry to find solution to improve the organoleptics of high-nutrition foods (e.g. Seaweeds) which otherwise is not popular due to undesirable taste. She concluded by encouraging the food industry to view these challenges as opportunities for growth and contribution to public health.

Question: *Certain processing technologies are beneficial for enriching food products, such as the utilization of oil seed waste. However, technologies like extrusion, used in producing soy chunks, a high-protein product are labelled as ultra-processed food technology in the new dietary guidelines, which is indirectly associated with unhealthy products. Could you clarify this apparent contradiction?*

Answer: Soybean is unique among pulses due to its high oil content, around 40%, making it suitable for both oil extraction and as a protein source. The extrusion process used to produce soy chunks involves several steps, including dehulling, flaking, solvent extraction, and powdering of the defatted flour, resulting in a product with less than 1% residual oil. While the process might be labelled as ultra-processed due to the reduction in fibre content and the number of processing steps involved, soy chunks remain a good source of protein, particularly for adults, with a protein digestibility-corrected amino acid score (PDCAAS) similar to reference proteins. The categorization of this technology as ultra-processed likely stems from its extensive processing rather than its nutritional value as a protein source.

Technical Session:
Diversity of Food Choices to Balance Lifestyle Needs and Health and Nutrition



Dr. B. Sesikeran, Former Director, ICMR - National Institute of Nutrition, emphasized the importance of dietary diversity in maintaining health and well-being. He discussed how traditional Indian foods can be integrated into modern diets to meet nutritional needs while accommodating the demands of contemporary lifestyles. Dr. Sesikeran highlighted the role of diverse food choices in preventing chronic diseases and improving overall health outcomes. He also discussed strategies for balancing convenience and nutrition, particularly in urban settings where fast food and processed foods are increasingly prevalent. Dr. Sesikeran underscored the value of local, seasonal produce in ensuring a nutrient-rich diet. He advocated for a return to traditional eating patterns that prioritize whole foods over processed options. Furthermore, Dr. Sesikeran pointed out the environmental benefits of choosing locally sourced foods, which can reduce the carbon footprint associated with long-distance food transport. He concluded by encouraging individuals to make mindful food choices that benefit both their health and the environment. He also suggested to the Industry to prepare a document on "Guidance for Consumers of Processed Foods" which will be useful for future discussions.

Question: *Indian ruling elites often promote vegetarian diets, as evidenced by instances such as schools in Noida asking children not to bring non-vegetarian food and Karnataka not serving eggs in the midday meal scheme. Currently, only five or six states include eggs in their midday meal programs. As a policy interventionist, how should the country proceed to ensure that poor children, particularly from tribal families, receive eggs and other nutritious foods in the midday meal scheme?*

Answer: The recommendation from the National Institute of Nutrition (NIN) has always included eggs as part of the dietary guidelines for school children, particularly in regions without cultural restrictions against eating eggs. However, the implementation of these recommendations is subject to the policies of the individual states running the midday meal program. While some states have chosen not to include eggs, our guidelines do recommend the inclusion of lean meats, fish, and eggs, except for red meat. In terms of protein quality and amino acid availability, soy is the only legume that matches animal protein sources. However, both vegetarian and non-vegetarian diets can meet the same protein requirements. For example, 300 ml of milk and 50 grams of dal or legumes can provide equivalent protein without relying on non-vegetarian sources. The debate between the benefits of vegetarian versus non-vegetarian diets is ongoing and often subjective, but our guidelines ensure that there are nutritious options available for both dietary preferences. Ultimately, it is an individual's choice.

Technical Session:
Perspective of Global Dietary Guidelines

Mr. Matt Kovac, Chief Executive Officer, Food Industry Asia, Singapore, provided an international perspective on dietary guidelines, discussing global trends in nutrition and their relevance to the Indian context. He highlighted the role of global dietary guidelines in shaping local food policies and industry practices. Mr. Matt emphasized the need for the Indian food industry to engage with global standards while considering local dietary habits and preferences. He also discussed the potential for cross-country collaboration in promoting healthy eating habits and improving public health outcomes. Mr. Matt pointed out that many global dietary trends, such as the reduction of sugar and salt, are gaining traction in India and could help align local practices with international standards. He also highlighted the role of technology and data in creating more personalized dietary recommendations. Additionally, Mr. Kovac discussed the importance of public awareness campaigns in driving the adoption of healthier eating habits globally. He concluded by expressing optimism about the potential for India to lead the way in adopting and promoting global best practices in nutrition.

Question: *How does the public consultation process, as mentioned in the case of the Australian dietary guidelines, work? How are the inputs from all stakeholders factored in, especially considering the role of the public in shaping these guidelines? Additionally, from your experience with various dietary guidelines, could you highlight factors where they typically converge and diverge, particularly within the Asia region?*

Answer: Regarding the Australian system, has a mandate to ensure a very transparent process. This transparency allows consumers to participate in public consultations, where they can submit their comments. There are several types of consultations, allowing a broad range of stakeholders, including consumer groups and individual consumers, to provide input. However, the process does involve filtering through many comments, some of which may not be relevant. Despite this challenge, the Australian system sets a strong precedent for inclusivity, ensuring that a wide array of voices are heard, not just a select few groups.

About dietary guidelines across the Asia region, a common principle across countries like Malaysia, Singapore, Thailand, the Philippines, Indonesia, and China is the involvement of industry associations in the consultation process. While not all countries open their consultations entirely to the public, they do engage various trade associations, nutrition societies, and consumer groups to represent diverse views. This approach ensures a level of openness and transparency, allowing for balanced input from different sectors while recognizing the unique cultural and dietary needs of each country.

Panel Discussion:
Relevance of Pre-packaged Foods in Indian Dietary Guidelines

Moderator:
Dr. Rashida Vapiwala, Founder LabelBlind

Panellist:
Dr. Subhaprada Nishtala, Vice President AFSTI (I)

Question: *Dr. Shuba, could you set the tone for this panel by highlighting the role of pre-packaged food in economic development and sustainability? How is this industry impacting consumption?*

Answer: We are at a stage where approximately 50% of our health food consumption is happening through packaged foods, though this figure might vary slightly. Despite this, there is a common perception that processing or packaged food is a necessary evil. This perception is disconnected from the reality that processing and packaged foods have played a significant role in food security and improving life expectancy in India-from 35 years in the 1950s to 74 years in 2023.

Packaged foods have been instrumental in achieving micronutrient sufficiency, which wouldn't have been possible without them. Furthermore, in terms of sustainability, the scale of manufacturing in the packaged food industry has contributed to job creation, reduction in food waste, and energy consumption efficiency.

However, the real issue we need to address is the extent of processing. The term "ultra-

processed" often carries a negative connotation, but processing itself should not be the determinant of a food's healthfulness. It is the outcomes of processing whether they enhance or diminish the nutritional value of food, that should be the focus. The narrative that processing is inherently bad is too simplistic and does not address the current concerns of malnutrition and overnutrition. As a group, we need to rethink how we discuss processing in the context of dietary guidance.

Question: *There is a lot of vilification of packaged foods on social media from voices that aren't necessarily scientific. How can we, as a fraternity, ensure that the right information is communicated to consumers, and how can we contextualize the guidelines effectively for their success?*

Answer: The first step is achieving parity among us in accepting and understanding these guidelines. The concern within the fraternity is that since this document comes from the ICMR, it carries significant weight and influences policymaking. A small misinterpretation could have far reaching consequences. From a food technologist's perspective, processing is often misunderstood. For example, while the guidelines might state that ultra-processed foods are typically deficient in fiber, this doesn't mean that all processing reduces fiber content. Such nuances need to be communicated clearly to avoid misinterpretation by policymakers who may not have the same background.

Regarding additives, these are often misunderstood as well. Many additives are salts that serve specific purposes within food products, and the process of deciding which additives are permissible is extremely robust, following guidelines from WHO and other authorities. It's crucial that we educate consumers positively about what healthfulness means, rather than focusing on negatives. For instance, while cold-pressed oils are often promoted as better, food safety in such products can be a concern if not handled properly. To communicate effectively with consumers, we need to establish a common understanding within the fraternity and focus on positive education. Consumers are intelligent and capable of making informed decisions if given the right information. Our role as scientists, policymakers, and industry representatives is to be honest and transparent in our communication. The industry also has a role in promoting healthful products, and many companies already have nutrition policies in place aimed at improving the healthfulness of their offerings. The goal should be to support consumers in making informed choices that contribute to their long-term health.

Panellist:
Dr. Avula Laxmaiah, Former Scientist G and Head, Public Health Nutrition, ICMR - National Institute of Nutrition

Question: *Dr. Avula, could you provide some India level consumption patterns and statistics specifically regarding the consumption of packaged foods? Do we have any data on this?*

Answer: We have conducted studies at the request of FSSAI around 2012-2013, examining the consumption of processed and non-processed foods across different regions of India. The data, which is about ten years old, indicates that the consumption of calories from processed foods in rural, urban, and semi-urban areas ranges from 8% to 12%. While we initially expected the percentage of calories from processed foods to be higher, it remains relatively low compared to other countries like Singapore, Canada, and the USA, where processed foods contribute to almost 46% to 50% of calorie intake. This report has been submitted to FSSAI and is accessible.

Question: *In your research, have you found instances where packaged food has been relied upon to address core issues like food losses, designing low-fat, low-sugar, low-salt foods, or fortification for micronutrient deficiencies?*

Answer: Yes, packaged foods play a crucial role in nutrition sustainability and security. While energy and protein sufficiency were once the primary focus, the increased prevalence of non-communicable diseases has shifted attention to nutrition security, emphasizing balanced intake of vitamins and minerals. Despite efforts to promote dietary diversity, some nutrients like riboflavin and vitamin A cannot always be obtained in sufficient amounts without fortification, making the consumption of processed foods essential in certain contexts.

For example, government programs like ICDS (Integrated Child Development Services) and MDM (Mid-Day Meal) often rely on processed and fortified foods, especially for children aged 6 months to 3 years who do not attend Anganwadi centres. In these cases, ready-to-eat foods, which are processed and fortified with various micronutrients, are necessary. One such product, "Balam," is distributed to 75-80 lakh children daily in Andhra Pradesh and Telangana, with similar programs in other states. Processed foods also become critical during emergencies, disasters, or in remote military areas where fresh food is not accessible. The key is to ensure that processed foods are developed with a focus on health, by reducing salt and sugar, retaining nutrients, and following healthy processing concepts to make them as beneficial as possible.

Panellist:
Ms. Naaznin Husein, Founder Director, Freedom Wellness Management and Ex-President, Indian Dietetic Association (Mumbai Chapter)

Question: *Considering the lifestyles that many people lead today, how practical is it for consumers to maintain a balance between avoiding or consuming ultra-processed food in moderation while still managing to cook enough food at home? How can we realistically achieve this balance?*

Answer: While people certainly want to eat healthy, it's not always feasible in today's fast-paced environment to cook fresh food all the time. Even fruits and vegetables can lose their freshness by the time they are consumed later in the day. Additionally, some schools have a nut-free policy, which limits the types of snacks that can be packed. Given these circumstances, it's clear that we cannot completely eliminate our dependence on processed foods, regardless of income level. However, we can make these foods healthier. The latest dietary guidelines might provide more scope for incorporating healthy options, but it's important to acknowledge that many modern households don't have full kitchens, often just a kettle and a hot plate These are challenging situations, but our goal as nutritionists is to help people eat healthy despite these realities, which inevitably means relying on some processed foods.

Question: *Snacking has become a significant trend in India, particularly among Gen Z and Millennials, who prefer snacking over having three full meals. Considering the new guidelines and definitions, it's likely that many snack products could fall under the HFSS (high fat, sugar, and salt) category. How should we address this trend?*

Answer: Snacking is indeed one of the biggest trends in India today, and it plays a crucial role in our diets. Snacking offers an important opportunity to incorporate essential micronutrients, fiber, and protein into our diet elements that might not be adequately covered in our main meals.

However, portion control is key. Snacks should be carefully portioned to serve as a stopgap between meals, ensuring they provide enough nutrients to keep you satiated until the next meal. By focusing on incorporating good fats, proteins, and micronutrients into snacks, they can contribute to overall nutritional security, not just food security. This makes snacking a valuable and vital part of our dietary habits in today's fast-paced lifestyle.

Panellist:
Dr. Subbarao M. G, Scientist – F & Head, Nutrition Information, Communication & Health Education (NICHE), ICMR - National Institute of Nutrition

Question: *The ICMR has undertaken the challenging task of defining ultra-processed foods (UPF) and high-fat, sugar, and salt (HFSS) foods in the 2024 dietary guidelines. Considering that there is no consistent definition globally, what criteria and methodology has the ICMR used to establish these definitions?*

Answer: Dr Subbarao dispel the myth that dietary guidelines treat packaged or processed foods as inherently harmful. In fact, the guidelines recognize that today's diets are incomplete without them, which is why processed foods are addressed in detail across different chapters. Specifically, Chapter 15 deals with ultra-processed foods and HFSS, and Chapter 17 emphasizes the importance of food label reading as a skill.

Globally, there is no universally accepted definition of ultra-processed foods, and most guidelines rely on the NOVA classification, which is based on the extent of processing and the types of ingredients used. The 2011 guidelines in India broadly categorized all processed foods as unhealthy, but the 2024 guidelines mark a shift by recognizing different levels of processing.

Chapter 15 of the guidelines attempts to define both the extent of processing and the impact on nutritional quality, such as the loss of desirable nutrients or the presence of excess nutrients of concern. The HFSS categorization, depletion of fiber, and loss of micronutrients are all addressed in this chapter.

The categorization into groups A, B, and C, was a topic of extensive debate within the committee. For example, even a minimally processed food can be classified as HFSS if it exceeds the threshold of 250 calories per 100 grams, which was established based on "My Plate" balance diet and global norms. This means that a food item could have good amounts of protein and fiber, but if it surpasses 250 calories per 100 grams, it still falls into the HFSS category.

We also consider traditional foods. For instance, nimbu pani (lemonade) may seem healthy, but if the majority of its calories come from sugar, consumers should be cautious. Similarly, homemade gulab jamun is as high in calories and sugar as commercially prepared ones, so the concern isn't about who makes it but the nutritional content.

An operational definition for ultra-processed foods has been provided in the guidelines, taking into account the NOVA classification and HFSS categorization. The concept of "ultra-processed" is still under debate globally, and the World Health Organization (WHO) is currently constituting an expert committee to better define the term. This indicates that the ICMR's guidelines are aligned with international discussions, and comprehensive checks and balances have been considered in the development of these definitions.

Panellist:
Dr. Alka Rao, Advisor, Regulations, Science and Standards, FSSAI

Question: *Despite the extensive research and scientific evidence supporting the use of food additives, they are often viewed negatively by consumers, who perceive all additives as harmful chemicals. What is your scientific perspective on this issue, and how can the guidelines balance the role of packaged foods with additives while ensuring they are seen as an important source of nutrition?*

Answer: First, it is important to acknowledge that additives play a crucial role in packaged foods, and sometimes even in cooked foods, particularly when it comes to extending shelf life, improving presentation, and enhancing taste and sensory qualities. Additives such as colors, salts, sugars, and various botanical extracts serve specific purposes, and their technological use is essential. From a national perspective, food needs to address both food security and nutritional needs. Additives help prevent food waste, ensure food safety, and maintain nutritional value, especially in harsh climates, during long supply chains, or in situations like military deployments where food must remain viable over extended periods.

The perception that additives are harmful often arises from misuse, such as excessive use of colors, which can lead to a negative view among consumers. This is why it's critical to establish and adhere to a code of practice that dictates how much of an additive should be used and when it is necessary. In terms of guidelines, the best approach is to create a clear code of practice or guideline document on the use of additives. This would help address concerns about misuse and provide clarity on when and how additives should be used. It's not about eliminating additives but ensuring they are used appropriately and safely.

Question: *With the new dietary guidelines of India and the ongoing digital scrutiny of products, what can we expect from FSSAI in terms of policy and regulation, especially concerning labelling and consumer information?*

Answer: As a consumer and citizen, I believe that our labels should be more valuable and easier to understand. While our current labels are rich in information, we need to simplify them to ensure they are user-friendly. The implementation of QR codes is a step in the right direction, and we should focus on making these QR codes more easily readable with simple mobile phones. Given the high level of digital penetration in India, mobile-based interventions are likely to be effective. However, it's important to strike a balance-providing enough information without overwhelming the consumer. Labels should highlight the most important information so that consumers can easily pick up what matters most. FSSAI has already done significant work on labelling provisions, and we expect to see further developments in this area within the next year.

Question: *With the emphasis on reducing high fat, salt, and sugar (HFSS) in food products, reformulation becomes key. Do we have an effective implementation plan for this, and beyond the recent regulations on highlighting fat, sugar, and salt on nutrition labels in bold, can we expect any further actions?*

Answer: The decision to highlight fat, sugar, and salt content in bold on nutrition labels was a significant and swift action taken by our scientific panels, including the labelling panel, the scientific committee, and the authority. This decision was well-received by all stakeholders, demonstrating our commitment to implementing meaningful interventions. We are actively working on further interventions, although some larger initiatives may be challenging to implement due to their scale. However, you can expect to see continuous, smaller interventions as we meet regularly with the authority to ensure that labels effectively communicate information to consumers. Regarding HFSS, India is leading the way by proposing a definition for these foods in our draft regulations. This draft is currently under review, and we are optimistic about being one of the first countries to provide such a definition. While the dietary guidelines have already simplified some aspects, establishing a globally accepted and implementable definition for HFSS remains a complex task, as discussed during recent meetings at the FAO in Rome. This challenge is acknowledged internationally, and we are proud to be at the forefront of this effort.

Additionally, we are continuously updating our nutritional regulations, including fortification standards. We are working diligently, relying on robust and reliable data, to enhance these standards. Although the regulatory process takes time, we are committed to making progress and welcome input from industry, academia, and the media as valued stakeholders in this ongoing work.

Panellist:
Dr. Shiny Surendran, Sports Dietitian, Founder Partner, Art of Eating LLP, Chennai

Question: *There has been a lot of discussion around protein consumption, particularly following the release of the NIN guidelines, which mention the utility of sports supplements. Could you share your thoughts on the guidelines, the ground reality of protein consumption, especially for athletic and active adults, and the role of protein supplements?*

Answer: While many people aspire to eat healthily, various factors such as allergies, lifestyle constraints, and religious practices make it challenging. For example, some people are allergic to nuts or face digestive issues with certain foods like dals, making it difficult to meet their protein needs through diet alone. Protein supplements have become an essential tool, particularly for individuals with busy lifestyles, frequent travellers, or those with specific dietary restrictions. The importance of protein in managing conditions like PCOS, non-alcoholic fatty liver disease (NAFLD), and pre-diabetes is also well-recognized. With the rising number of young people at risk of these conditions.

Protein supplements are particularly useful for those who cannot consume certain foods due to religious reasons, fasting rituals, or other constraints. They also offer convenience for individuals who travel frequently and may not have access to balanced meals. Social media plays a role in this, and while it has its advantages and disadvantages, a structured approach to public education would be truly beneficial.

Question: *The guidelines suggest that whether food is packaged, unpackaged, home-cooked, or processed, if the nutritional value is the same, they should all be considered equivalent. However, the guidelines also mention that street foods are generally wholesome and fresh. How does this align with the food safety record of street foods in a country like India?*

Answer: The statement regarding street foods being wholesome and fresh refers to the fact that street foods are typically hot-cooked and freshly prepared, which can be beneficial from a nutritional standpoint. However, it is important to differentiate between safety and nutrition. Not

all foods that are safe are necessarily nutritious, and vice versa. The guidelines emphasize three key takeaways:

1. **Understanding Healthy vs. Unhealthy:** Consumers should learn to distinguish between what is healthy and what is not.
2. **Diet Diversity:** No single food provides all necessary nutrients, so it is crucial to maintain a diverse diet, preferably composed of locally available and traditionally consumed foods
3. **Reading Labels:** Given the current food consumption scenario in India, it is important to read and understand food labels to make informed choices.

These points aim to guide consumers in making healthier and safer food choices, whether the food is street food, packaged, or otherwise.

CONTACT US

Prerna Sethi
Research Associate, FICCI
Email: prerna.sethi@ficci.com

Varsha Yadav
Research Associate, FICCI
Email: varsha.yadav@ficci.com

Email ID: cifti@ficci.com | Website: www.ficci.in