



INDIAN DRUG MANUFACTURERS' ASSOCIATION

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INDIAN PHARMACEUTICALS FOR GLOBAL HEALTH

19 January 2015

Smt. Anuradha Prasad,
Joint Secretary to the Government of India,
Ministry of Food Processing Industries,
Panchsheel Bhawa, August Kranti Marg,
Khelgaon, New Delhi

Subject: Comprehensive Proposal for amendments in FSS Act 2006

Dear Madam,

This is in reference to our delegation meeting to **Ministry of Health** dated 22 Dec 2014 on behalf of various HealthCare Associations primarily represented by **IDMA** on various issues of policy matter affecting HealthCare sector.

It is to respectfully inform you that **FSSAI (Food Safety & Standards Authority of India)** operations and activities in last 2 and a half years was one such high concern area which has severely disturbed the established operations of FBOs was discussed with **Honourable Health Minister, Shri J.P. Nadda** for whom we have carried a copy of Comprehensive Proposal for amendments in **FSS Act**.

During such representation to respected Health Minister, we were advised to do such submission to related Ministries & Departments like **MOH, MOFPI** subsequently after 2 weeks of this meeting.

It is to inform you that **Indian Drug Manufacturers' Association, Nutraceutical Subcommittee** has intensively put in the efforts has made comprehensive proposal for amendment keeping the balance interest of Indian Population Health & Safety, Stake Holders of Business Operations, Industry Development & Growth and most importantly also to facilitate the prime agenda of our Honourable and Respected Prime Minister, "**Make In India**" Mission for flourishing India with Industrialisation and uplifting the pride of Nation.

It is to keep you informed that our Delhi Office of IDMA, has already submitted such comprehensive proposal on 2nd Jan' 2015 and 12th Jan' 2015 in person and also via e-mail to an office of Director Food, **MOH** is attached herewith the copy of proposal for your reference and intervention during the proceedings of committee meeting to take place.

However, to enlighten you and bring to your notice that the major cause for turmoil in Food Business operations is due to complexity and ambiguous Section 22 (Chapter IV). We understand that you have sent an invitation to various association seeking proposal for amendments in Section 22 (Chapter IV) which can bring halt to unrest such situation.

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We as a largest healthcare association strongly propose keeping the larger interest of Indian population and Stakeholders, Section 22 (Chapter IV) should be restricted to Novel Foods, Irradiated Food and Genetically Modified Food only. In order to do so there should be an appropriate amendment carried out under Section 3 (Chapter 1) for defining such food articles clearly.

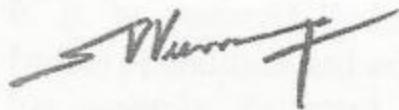
On the otherhand, we propose that Food for Special Dietary Uses, Functional Foods, Nutraceuticals, Health Supplements, Proprietary Foods and such other articles of foods which Central Government may notify in this behalf, can be manufactured as per the regulation of the Act and as deemed appropriate under category 13 of Indian Food Code (IFC).

It would be of high pertinence and significance to consider proposal and representation by a 55 year old and the largest Healthcare Association which will bring harmony between Industry and Government. Also seeking suitable time for your kind appointment for elaborative discussion by our representatives.

We as an Industry look forward to work closely towards "One Mission of our Nation, "Make in India"

Thanking you,

Yours sincerely,



S.V. Veerramani
President

Enclosure-

1. Representation and proposal made to Honourable Health Minister, **Shri J.P. Nadda, MOH** along with acknowledgment letter.
2. Representation proposal made to Mr. **Tarsem Chand**, Director (Food) **MOH**.

Cc: **The Hon'ble Shri J.P. Nadda ji**,
Minister of Health & Family Welfare,
Government of India,
Nirman Bhawan, New Delhi

Shri Lov Verma,
Secretary to the Government of India,
Ministry of Health & Family Welfare,
Nirman Bhawan, New Delhi

Shri Siraj Hussain,
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