

INDIA'S MASSIVE FOOD FORTIFICATION PROGRAMME RIDDEN WITH CONFLICT OF INTEREST



Context and Background

- **Government of India's big policy push makes iron-fortified rice near-mandatory for the poor who are dependent on public food schemes in the country** - PDS (Public Distribution System), ICDS (Integrated Child Development Scheme), PMGKAY (Pradhan Mantri Garib Kalyan Anna Yojana, a covid-pandemic related food scheme) and MDMS (Mid Day Meal Scheme) – all food schemes to have iron-fortified rice supplies by 2024 (Ref.: [PIB PR from CCEA on 8/4/22](#))
- **Safety of Iron-Fortified Rice in Public Food Schemes:** Health risks for those suffering from infections like Malaria and Tuberculosis, or haemoglobinopathies like Thalassemia and Sick Cell Anemia
- **Statutory warning mandated as per Food Safety and Standards (Fortification of Foods) Regulations, 2018** : [Compendium_Food_Fortification_Regulations_30_09_2021.pdf \(fssai.gov.in\)](#)

Regulation 7 (“Packaging and Labeling Requirements”)(4): Every package of food, fortified with Iron shall carry a statement “People with Thalassemia may take under medical supervision and persons with Sick Cell Anaemia are advised not to consume iron fortified food products”
- **Fact Finding Visits to Jharkhand and Chhattisgarh:** Several issues surfaced which were shared with the authorities concerned and with media too.

OUR REPORT BEING RELEASED TODAY IS ON “FOOD FORTIFICATION RESOURCE CENTRE (FFRC)” HOUSED IN THE FSSAI, INDIA’S STATUTORY REGULATOR FOR FOOD SAFETY

- i. On [5th November 2020](#), ASHA wrote to FSSAI expressing its concerns about mandatory fortification in India
- ii. On [19th November 2020](#), “Food Fortification Resource Centre (FFRC)” wrote a reply from [fortification@fssai.gov.in!](mailto:fortification@fssai.gov.in)
- iii. ASHA responded back to FFRC on 2/8/2021 with 168 other signatories, without really questioning what FFRC is...Ironically, in that letter, we pointed out to conflict of interest, and need for independent studies

ONLY LATER DID WE LOOK INTO FFRC and realised that some “non-regulatory” entity was responding to our letter....

Govt departments in RTI replies said “matters on rice fortification are being looked at by the *FFRC cell FSSAI*”










Response to “Regarding FSSAI planned mandatory fortification of Edible Oil with Vitamin A and Vitamin D and Rice with Vitamin B12, Iron and Folic Acid” ➤

FSSAI Fortification <fortification@fssai.gov.in>

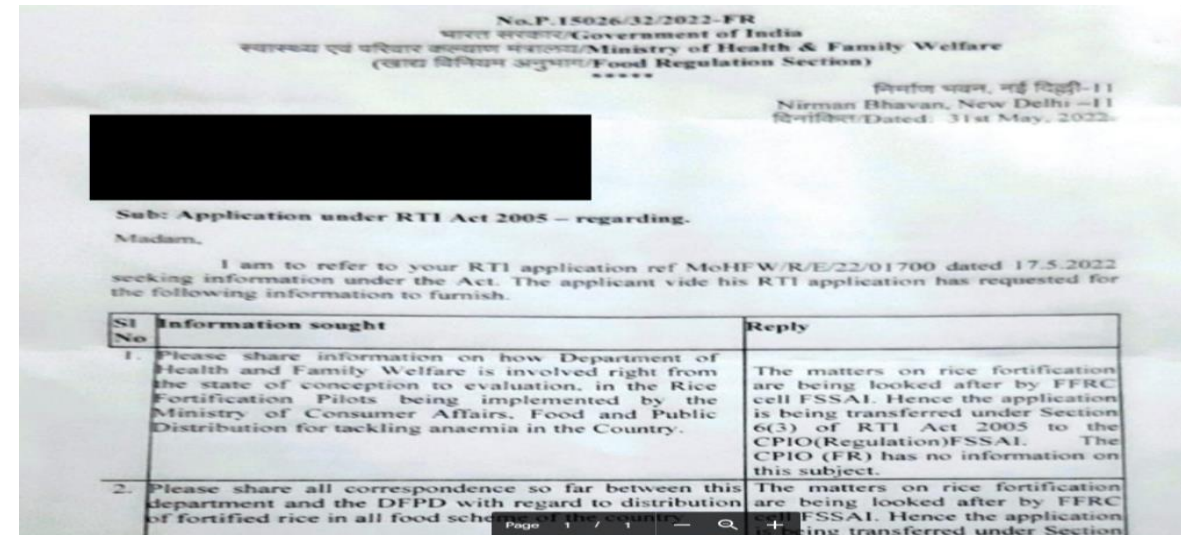
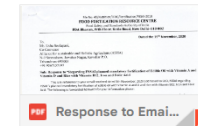
to me, Alok, Minister, secy.wcd, Vice-, DR, Narendra, Sanjay, Shri, Mr, Mr, FSSAI, directorfssai, Ashok, rohini ▾

Dear Ms. Usha Soolapani,

Please find attached response to your email received dated 5th November, 2020 addressed to CEO, FSSAI regarding FSSAI's planned mandatory fortification of edible oil with Vitamin A and D and Rice with Vitamin B12, Iron and Folic Acid. This is for your kind information please.

Thanks and Regards
Ashok Kumar Mishra
Assistant Director (FFRC)

One attachment • Scanned by Gmail



So, what is FFRC?

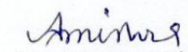
“The Food Fortification Resource Centre was created to address the concerns and provide support to the States/UTs and the industry. There are many experts that provide technical know-how to both however, for smooth operations and grievance redressal, FFRC works with multiple stakeholders and all the concerned ministries, NITI Aayog, industry, scientific experts, nutritionists, doctors, food technologists, media, States/UTs, industry, consumer research groups, national and international NGOs like the POSHTIK network to align and map the supply and demand of fortified foods”.

— as per FFRC's letter to ASHA dated 19/11/2020

10. The Food Fortification Resource Centre was created to address the concerns and provide support to the States/UTs and the industry. There are many experts that provide technical know-how to both however, for smooth operations and grievance redressal, FFRC works with multiple stakeholders and all the concerned ministries, NITI Aayog, industry, scientific experts, nutritionists, doctors, food technologists media, States/UTs, industry, consumer research groups, national and international NGOs like the POSHTIK network to align and map the supply and demand of fortified foods.

11. Under the Eat Right India initiative of FSSAI, promotion of local, seasonal and fresh produce is already being stressed on and a lot of awareness content has already been created for the same. You may like to visit the website <https://eatrightindia.gov.in/EatRightIndia/index.jsp> for more details. ERM is a PAN India focussed campaign which promotes food safety, healthy and sustainability.

Thanks,


Ashok Kumar Mishra
(Assistant Director, FFRC) 19/11/2020



GAIN Global Alliance for Improved Nutrition;

FFI: Food Fortification Initiative

GCNF: Global Child Nutrition Foundation

N: Nutrition International

PATH formerly Program for Appropriate Technology in Health

"FSSAI has also established a Food Fortification Resource Centre (FFRC) to facilitate and support food businesses in their fortification efforts. I am reasonably optimistic that fortified staple food will soon be available in the open market and most states will soon switch over to using fortified foods in the government programmes."

- Former FSSAI CEO Mr Pawan Aggarwal, quoted in a media article on 10/4/2017

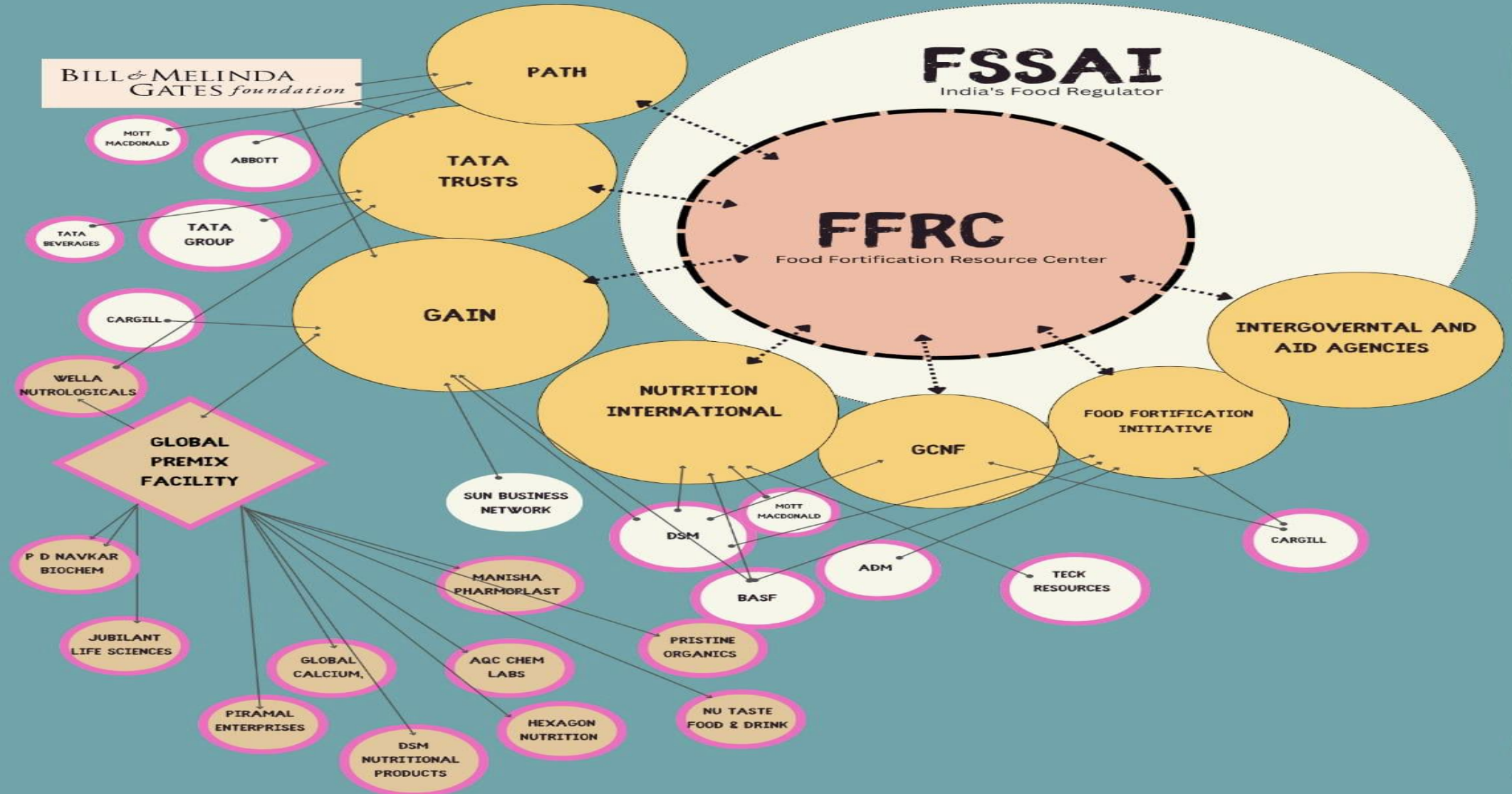
Conflict of Interest

- Conflict of Interest can be broadly defined as a situation where an entity's integrity, independence and impartiality with regard to its designated duties get compromised due to the interference of other interests.
- The “other interest” may or may not be financial, may be actual or perceived/potential, and can be institutional or individual.
- In addition to the above, in the [WHO's draft framework](#) on “Safeguarding against possible conflicts of interest in nutrition programmes” (December 2017), an “*outcome-based conflict of interest*” is described as that CoI which arises when a vested interest involved in policy-making or policy-implementation process, seeks outcomes that are inconsistent with the demonstrable public interest.
- “*Conflict represents an interest that would influence Member's judgement and situations where member's impartiality may be compromised*”. FSSAI [talks](#) about the “managing” conflict of interest through disclosure of general interest, and disclosure of interest specific to agenda items placed for discussion (draft guidelines of 2010). FSSAI identifies *Personal Interest, Business Interest and Professional Interest* under ‘nature of CoI’.
- Draft guidelines issued by FSSAI on Working with the Private Sector (2019), specifically seek to ensure “independent” scientific expertise in its Scientific Committee and Scientific Panels however.
- [ASHA's response](#) to FSSAI's draft sought avoidance of conflict of interest, and not management.

INDUSTRY PLAYERS AND THEIR LINKAGES TO THE FFRC



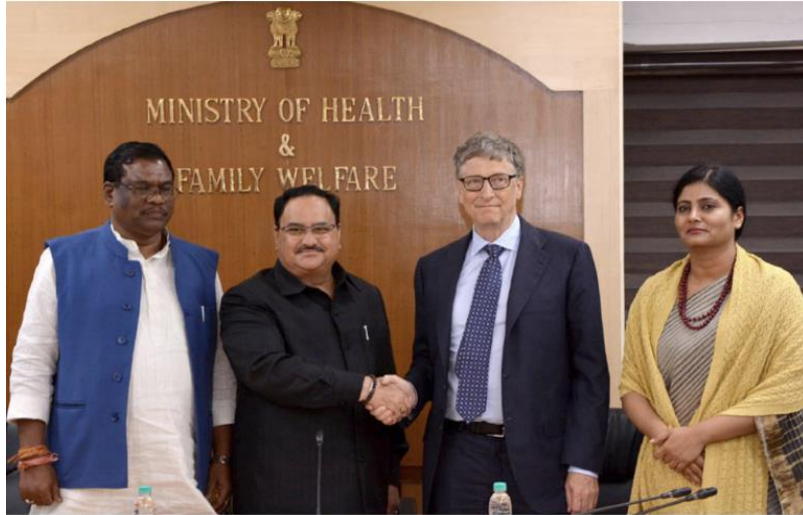
Entities highlighted with a pink circle are those that either produce nutraceuticals or market fortified products, thus having a direct profit interest in fortification policies



Industry partners of FFRC members

Name of the FFRC partner NGO	Associated Corporate entities (micronutrient producers and ultra-processed food manufacturers) that could profit from gaining market access via fortification policies
Tata Trusts	Tata Group, Wella Nutrologicals, Tata Global Beverages
GAIN	Sun Business Network is a multi-stakeholder platform facilitated by GAIN with several corporate entities involved including micronutrient producers- such as BASF, Royal DSM, Cargill. Indian corporations that the GAIN Premix Facility is certifying and purchasing in bulk to sell to institutional buyers across the world from include: AQC Chem Labs, DSM Nutritional Products, Hexagon Nutrition Global Calcium Manisha Pharmoplast, Nu Taste Food & Drink, P D Navkar Biochem, Piramal Enterprises, Pristine Organics, Wella Nutrologicals. Jubilant Life Sciences
PATH	Mott MacDonald, PATH and Abbott created a proprietary technology called Ultra Rice, [®] a rice fortification technology that they have been promoting within India.
Nutrition International (formerly Micronutrient Initiative)	DSM, Teck Resources Limited
<u>The Food Fortification Initiative (FFI)</u>	BASF, DSM, Cargill
The Global Child Nutrition Foundation (GCNF)	Cargill, DSM

The Gates Foundation



- FFRC launched in presence of Bill Gates
- Several of the FFRC members funded by BMGF for fortification work. Few Examples:
 - Nutrition International 37.5 crore INR in 2022, 11.9 cr in 2021
 - GAIN: 128 crore INR in 2021
 - PATH: 40.1 crore INR in 2021
 - Tata Trusts: multiple grants from 2015 onwards for Fortification/Nutrition work including a 50-crore grant
- BMGF has launched lobby groups like GAIN with a 50 million USD investment to create markets for food companies

THE WALL STREET JOURNAL.

In exchange, the consortium, called the Global Alliance for Improved Nutrition, or GAIN would offer companies assistance in lobbying for favorable tariffs and tax rates and speedier regulatory review of new products in targeted countries. The consortium also would give local governments money for initiatives to help create demand for fortified foods, including large-scale public relations campaigns or a governmental "seal of approval."

Same formula being applied in India now.....

Examples of Policy Influence & Col

Lobbying + laying of standards

- Tata Trusts founded the The India Nutrition Initiative (TINI) which has worked closely with the FSSAI to define and notify the standards of fortification for wheat, oil, milk, double fortified salt and rice. TINI was also part of the setting up of FFRC in 2018.
- GAIN: *“It is widely agreed that GAIN played a key role in engaging with FSSAI and convincing various levels of government in certain states to include the mandatory use of fortified edible oil in their national social protection schemes ... importantly, the success of this program has reportedly primed India to adopt mandatory fortification of edible oil.”*
- PATH: *“PATH also supported India’s Food Safety and Standards Authority in formulating staple food fortification standards.”*

Implementation and evaluation of pilots

- Pilot program by Tata Trusts in Maharashtra
- Nutrition International providing technical support to the governments of Gujarat and Madhya Pradesh
- WFP in UP

Selling equipment and nutraceuticals

- PATHs Ultra Rice® + Akshay Patra in Karnataka + selling equipment
- WFP + General Mills in UP

Producing Premix + nutraceuticals

- GAIN premix facility
- Tata through Wella Nutrologicals

CONCLUSIONS & CONCERNS WITH THE FFRC BEING HOUSED IN THE FSSAI

- Conflict of interest
- One sided portrayal of fortification
- Divergent Mandates of FSSAI and FFRC



**We ask for FFRC to be removed from FSSAI –
We demand that FSSAI purge itself of conflict of interest**

For more information, you can write to asha.kisanswaraj@gmail.com