



India for Safe Food

Safe Food - Our Right! No Chemicals, No GM!

To:

August 7th 2018

Shri Pawan Kumar Agarwal,
Chief Executive Officer,
Food Safety & Standards Authority of India,
FDA Bhawan, near Bal Bhavan,
Kotla Road, New Delhi – 110002

Dear Shri Agarwal,

India For Safe Food is a citizen platform working across India from 2013 onwards, for promoting and ensuring food safety, especially by tackling issues related to unsafe agricultural technologies that end up making our food hazardous (www.indiaforsafefood.in).

We are writing to you about the Centre for Science & Environment's findings from the study published in July 2018, showing how illegal GM foods are being sold in large numbers in Indian food market without FSSAI approval. In the study, the following food products and brands were identified as the GM foods being sold illegally in India:

- a) Canola Oil - Brands - Candrop, Farrell, Hudson, Jivo
- b) Cottonseed Oil - Brands - Ankur, Ginni, Tirupati, Vimal
- c) Crude cottonseed
- d) Corn syrup - Brands - Aunt Jemima, Karo
- e) Pancake syrup – Brand - American Garden
- f) Cereal – Brand - Kellogg's Froot Loops
- g) Snacks - Brands - Bugles corn snacks, American Garden popcorn, Mrs Cubbison's Butter & Garlic Croutons, Trix corn puff, Promplus kernel corn
- h) Pacific Nutritional Foods Mori-Nu silken tofu soybean
- i) Infant food - Abbott Laboratories Similac (Isomil and Alimentum)

We also understand that months ago, a complaint was made by Coalition for GM-Free India on this subject, and that their letter to you mentions other products including Hudson/Sattvic/ Jivo/Wesson/Crisco/ Mazola/Canola Harvest/CanDrop/Alom's canola oil, Haldiram's Bhujia Sev/Moong Dal, Tasty Treat's Navratan Mix, Khatta Meetha, American Garden Popcorn, Jacker Potato Crisps, Betty Crocker Delights Super Moist Cake, Ragu Pasta Sauce as listed here <http://indiagminfo.org/fssai-keeps-mum-on-illegal-gm-foods-flooding-the-indian-market/>. It appears that no action has been taken on this by FSSAI.

Existing scientific evidence clearly points to numerous health risks from GM foods. Experiments from all over the world show clearly that GM foods are not safe. Adverse impacts include effects on growth and development of an organism, organ damage, immune system disorders, cancerous growth, reproductive health problems including infertility, allergies etc., amongst other impacts. There are hundreds of peer-reviewed scientific studies raising concerns on health impacts of GM food listed here <http://indiagminfo.org/wp-content/uploads/2013/11/Sci-ref-complete-book-2nd-edition.pdf> some of which have also been listed by Indian Council of Medical Research earlier too.

We are not satisfied by FSSAI's response here http://www.fssai.gov.in/dam/jcr:46591b56-43c3-428f-9c2c-68cc8c4d20ee/Press_Release_GM_Food_Regulations_26_07_2018.pdf on the CSE study where FSSAI does not suggest that it would take any action on the offending parties responsible for bringing GM food illegally to consumers. We are worried and concerned by the lack of action from FSSAI, the food safety and standards regulator for India. If we cannot obtain any responsible action from FSSAI on such a study with clear-cut findings, who else can we expect to ensure only safe food reaches Indian citizens.

We cannot accept cost of testing to be made reason for the high proposed threshold of 5% on GM foods when it comes to labeling regulations. When lab facility testing allows for testing to 0.01% level of GM detection and countries like France, Germany amongst others apply a threshold of 0.1% for GM detection that too for adventitious/unavoidable presence, there is no reason India cannot adopt those standards too.

Handwritten signature and date: 7th Aug 18

Handwritten signature: Shri Pawan Kumar Agarwal
Food Safety & Standards Authority of India
Ministry of Health & Family Welfare
FDA Bhawan, Kotla Road,
New Delhi-110002

Given that most of the GM foods as found in CSE study are being imported, we also call upon you to strengthen the system to stop illegal GM imported food coming to Indian markets.

We, concerned citizens and representatives of India For Safe Food, have now come to your office to request you to –

- Remove the 21 brands of food products that tested positive for GM presence, from retail outlets as well as warehouses of importers and stockists.
- Initiate penal action against manufacturers, importers and distributors of the food products as per the Food Safety and Standards Act 2006
- Ensure required thresholds on GM food to the tune of 0.01% allowing for only adventitious/unavoidable presence, beyond which labelling has to be mandatory
- Make testing facilities accessible for common public to get GM food testing done for free
- Strengthen the surveillance and detection system with regard to illegal GM imports so as to stop it at its source, and to activate international protocols like the Cartagena Biosafety Protocol.

Kind Regards,

Ajay
7 Aug - 2018

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