

THE GANDHIDHAM CHAMBER OF COMMERCE & INDUSTRY

(ESTD. 1953)

"CHAMBER BHAVAN", Plot No. 71, Sector 8, Post Box No. 58,

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No. GCCI / 463

Date: 08.10.2018

Shri Pawan Kumar Agarwal Chief Executive Officer Food Safety and Standards Authority of India, FDA Bhawan near Bal Bhavan, Kotla Road, New Delhi - 110002	Ms. Preeti Sudan, Secretary (H&FW) Ministry of Health and Family Welfare, Department of Health and Family Welfare, Room No. 156-A, A Wing, Nirman Bhawan, Maulana Azad Road, New Delhi - 110 011	Shri Rakesh Srivastava Secretary, Ministry of Women and Child Development Shastri Bhawan, Dr. Rajendra Prasad Road, New Delhi
Dr. Vinod Kumar Paul Member Niti Aayog, C-2/19, AIIMS, Ansari Nagar, New Delhi	Shri Ravikant Secretary (F &D) Ministry of Consumer Affairs, Food and Public Distribution Department of Food & PD Krishi Bhawan, New Delhi - 110001.	Shri Kumar Anil, Advisor (Standards) Food Safety and Standards Authority of India, FDA Bhawan near Bal Bhavan, Kotla Road, New Delhi - 110002

Sub: Protest for proposed specification of iodized and double fortified salt

Ref: Notification No. 11/03/Reg/Fortification/2014 Dated 02.08.2018 issued by
Ministry of Health and Family Welfare.

Dear Sir,

The Gandhidham Chamber of Commerce & Industry is a pioneer organisation of Kandla – Gandhidham complex in Kachchh District of Gujarat State in India since 1953 with the main objective to serve as a bridge between local trade and industry fraternity and State / Central Govt. for the resolution of problems and to cater supportive service to business community.

As we understand The Indian Salt Manufacturers' Association (ISMA) had called a meeting of its members recently and the caption subject matter was discussed. Nearly 200 members present in the meeting unanimously protested iodine standards notified vide above refer notification. In this connection, our Chamber had studied and discussed the matter with stakeholders. Accordingly, their concerns and valid points are as under:

- ❖ The introduction of iodization started somewhere in 1980 with minimum PPM standard level.
- ❖ Up till now with 30 PPM standards at manufacturing level and 15 PPM at consumer level of iodization process is in progress. However, the iodine content cannot be maintained consistently as generally iodine gets evaporated with different packaging and the movement from manufacturer to consumer.
- ❖ During the manufacturing process the iodine is coated by spraying iodine. There is no availability of any efficient technology to maintain fixed PPM of iodine. Even Tata Salt also use and follow the same technology for the iodization what other salt manufacturer use and follow.
- ❖ Salt is a low price product and iodine further carries cost to ultimate product.

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- ❖ Although we welcome reduction in iodine content from 30 PPM to 20 PPM as minimum level, it may not be possible to maintain upper limit as specified. There should not be any upper limit of iodine and if at all necessary to fix then it may be 80 to 100 PPM for iodine.
- ❖ No incidence of adverse impact on human being of excess iodization has been reported so far. However, if there is any study report of scientific panel for the excess iodization then the same should be shared with salt industry.
- ❖ Iodized salt is being produced by small manufacturer also. Hence, to maintain the level of maximum standards will be difficult and failure will lead to unnecessary harsh penalty and harassment because of non-availability of any effective technology.
- ❖ Proprietary products like "Puro Salt" enjoy non-compliance of iodization standards. Iodization standards should be imposed compulsorily on such products else other manufacturer will switch-over to proprietary product category with necessary licenses thereof.
- ❖ Regarding Iron Fortified Iodized Salt(DFS), the same should not be made compulsory and salt manufacturer will produce DFS if there is demand from public. The Government should encourage and do mandate for distribution of iodized salt under PDS, ICDS, MDM and other Central & State Government schemes.
- ❖ If government has any user efficient technology for iodization then the same should be made available to salt manufacturers and they will follow the new technology. We request you to fix a meeting of Scientific Panel with salt manufacturer delegation to represent their case.
- ❖ Government and Scientific Panel should take ground reality about the quality of salt produced in India for edible purpose and interest of salt industry into consideration before taking any decision on this sensitive issue.

In view of the above, we are of the strong opinion that the government should take note of concerns of salt industry and reconsider the whole matter else the salt manufacturers will be compelled to close down their salt iodization operation.

Your immediate reconsideration followed by revised intimation in this regard is expected.

Thanking you,

Yours faithfully,

Dinesh Gupta

President

Copy to: Prime Minister Office & President, ISMA