

# THE GANDHIDHAM CHAMBER OF COMMERCE & INDUSTRY

(ESTD. 1953)

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No. GCCI / *756*

Date: 12.03.2019

Shri Pawan Kumar Agarwal Chief Executive Officer Food Safety and Standards Authority of India, FDA Bhawan near Bal Bhavan, Kotla Road, New Delhi - 110002 ceo@fssai.gov.in	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 chairperson@fssai.gov.in, secyhw@nic.in	Shri Rakesh Srivastava Secretary, Ministry of Women and Child Development Shastri Bhawan, Dr. Rajendra Prasad Road, New Delhi secy.wcd@nic.in
Dr. Vinod Kumar Paul Member Niti Aayog, C-2/19, AIIMS, Ansari Nagar, New Delhi vinodk.paul@gov.in	Shri Ravikant Secretary (F &D) Ministry of Consumer Affairs, Food and Public Distribution Department of Food & PD Krishi Bhawan, New Delhi - 110001. secy-food@nic.in	Shri Kumar Anil, Advisor (Standards) Food Safety and Standards Authority of India, FDA Bhawan near Bal Bhavan, Kotla Road, New Delhi - 110002 advisor@fssai.gov.in

Sub: Protest for proposed specification of iodized salt

Ref: 1) Notification No. 11/03/Reg/Fortification/2014 Dated 02.08.2018 issued by Ministry of Health and Family Welfare.

2) Our Letter No. GCCI/463 dated 8.10.2018 (copy attached)

Dear Sir,

This has reference to our written submission as referred above on the caption subject followed by our personal meeting at New Delhi. The brief highlights of our submission on the subject matter is 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.
- ❖ 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.

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
- ❖ 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.

In this connection, the implementation of the subject matter was kept in abeyance till June'2019 and the matter was kept on reconsideration after due diligence with the stakeholders. We shall appreciate if you would please update us about the reconsideration status as time limit reaching very fast.

Your immediate response will be highly appreciated.

Thanking you,

Yours faithfully,

  
Dinesh Gupta  
President

*Ed:-a/a*