

# THE GANDHIDHAM CHAMBER OF COMMERCE & INDUSTRY

(ESTD. 1953)

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

GANDHIDHAM - Kachchh - 370 201.

Phone : +91-02836-220977, 220735 • Mobile : 99250 37814 • Fax : 220888

e-mail : info@gccikandla.com • Website : www.gccikandla.com

No. GCCI / 629

Date: 02.01.2019

Madam Dipika,  
Joint Director,  
Food and Drugs Control Administration (FDCA),  
Block No. 8, 1st Floor, Dr. Jivraj Mehta Bhavan,  
Gandhi Nagar- 382010, Gujarat

## Sub: Various matters pertaining to Salt

Respected Madam,

We, 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.

We take an opportunity to draw your attention towards the following matters pertaining to salt.

### ➤ TO ABOLISH MAXIMUM IODINE LIMIT

The introduction of iodization started somewhere in 1980 with minimum PPM standard level. Up till now with 30 PPM Iodine minimum standards at manufacturing level and 15 PPM Iodine minimum 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 at manufacturing 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.



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➤ EXEMPTION TO ASCERTAIN LED PERCENTAGE

It has been made compulsory to ascertain Led Percentage in Iodine Salt. To ascertain led percentage, Potassium Cyanide is required which is not available freely being a poison. Hence, exemption should be granted for the ascertainment of led percentage.

➤ IODIZATION OF ROCK SALT

In case of rock salt, there is no clarity for iodization resulting dilemma among all. Hence, iodization for rock salt should be made compulsory.

➤ MISBRANDING

We understand from salt manufacturing fraternity that due to some minor mistakes of statutory declaration and design aspect of the label on packaging of salt, the salt manufacturers are becoming victim of misbranding cases and have to undergo unnecessary harassment and legal proceedings. In light of the above, we suggest to decide & appoint a local agency with authorization to approve text and design of label on salt packaging. This will help to reduce the work load of misbranding cases and in turn the undue harassment will be avoided to the salt manufacturers.

We hope, our above submission will get positive consideration from your end and in the larger interest of salt manufacturers of Gujarat State.

Thanking you.

Yours faithfully,

  
Dinesh Gupta  
President