

Research Paper on Food Safety and Standards (Health Supplements, Nutraceuticals, Food for Special Dietary Use, Food for Special Medical Purpose, Functional Foods and Novel Foods) Amendment Regulations, 2020

Government pertaining to amendments made in the **Food Safety and Standards (Health Supplements, Nutraceuticals, Food for Special Dietary Use, Food for Special Medical Purpose, Functional Foods and Novel Foods) Amendment Regulations, 2020**, which is expected to notify anytime soon.

Much of these proposed changes have been incorporated without due process of public consultation. The amendment in question will have important bearings on the manufacturing process of substantial numbers of small manufacturers and the traders who are selling such products, it is requested that the implementation date of the aforesaid notification may be deferred and the trade associations whose members are dealing in such products may be given an opportunity to place their views and as also to evaluate economic impact on the sellers, on the same for your kind consideration.

Several member trade organizations and MSMEs in different States of the Country have informed us that this decision has been taken without adequate consultation especially with MSMEs. In this COVID situation, livelihoods are already precarious, and such a step could lead to further economic stress. Further, these products are sold off the shelf as well by micro-entrepreneurs, and this sudden decision puts their livelihoods at risk, and could involve over 10 lakh livelihoods. Moreover, this step would render daily-use products unavailable for consumers which are relying to fulfill their nutrient requirements and physiological needs.

Given the minimal notice, it would be difficult for small Industries & MSMEs to once again reformulate the products, which would bring business disruption. We understand that this process goes all the way till the farmers, who grow and supply requisite botanicals. They may plant herbs and other organic produce to sell to MSMEs who then make ingredients for use by other industry. The whole supply-chain may get adversely impacted - raw material suppliers, manufacturers, retailers comprising large number of micro-entrepreneurs and MSME.

The extension of date of implementation by at least one year is necessary and we must allow to submit a detailed note on this issue. We would like to make it explicitly clear that there should not be any compromise with the health and welfare of the people of the India but it is equally important that no economic disruptions should take place particularly during the current critical COVID pandemic period when the trade has just began again and striving hard to restore normal business activities.