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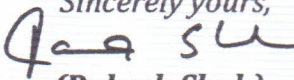
Dear Shri Agarwal,

The Chamber is happy that the FSSAI has compiled 'The Pink Book' as a guide on 'Safe and Nutritious Food at Home'. The initiative taken in this regard is laudable and has made a good beginning.

Having studied the contents of The Pink Book, we feel that there is a lot of room for improvement in case the publication is in a draft mode. The suggestions of our Chamber on further improvement on the text of the publication have been outlined in the attached Note for your kind consideration. In case the FSSAI requires any further clarifications on the Chamber's observations, we would be pleased to provide the same.

The receipt of the attached Note may please be acknowledged.

With best regards,

Sincerely yours,

(Rakesh Shah)
President

Encl. As above.

Shri Pawan Kumar Agarwal
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OBSERVATIONS ON THE PINK BOOK :

1. INTRODUCTION :

- 1.1. In order to make the publication more attractive a lot of coloured photographs have been incorporated in each page. In some pages, the reading matter is quite insignificant compared to the space occupied by the pictures and mascots. It would be perhaps better if the reading matter is given a larger display by minimising the general pictures. Each page should have one mascot with a 'Message' to take home.
- 1.2. The Contents of the 'Pink Book' have laid greater emphasis on nutrition than food safety. The Chamber is of the view that it would be more appropriate if The Pink Book could stress on daily issues concerning hygiene and highlight all the basic issues concerning contamination and cross contamination. The only chapter on hygiene and sanitation is on page 28 which is cramped with a lot of information. These needs to be classified in terms of the sources of bacterial and fungal contamination and thereafter, the care required for hygiene and sanitation could be explained. The steps for sanitation in cleaning refrigerator, gas burners, kitchen tables, etc. should be added wherever possible.
- 1.3. Similarly, nutrition facts have been covered on page 6. Even without pictures, the reading matter on this page is heavily cramped. It would be worthwhile to devote at least half page to cover each item of nutrition like carbohydrates, vitamins, energy, etc.

- 1.4. Besides, a chapter needs to be devoted on nutraceuticals and functional foods, novel foods and health supplements. Often consumers are being misguided in respect of these new terminologies.
- 1.5. Considering that the 'Pink Book' is a guide for safe and nutritious food at home, 'Exercise' on page 23 seems to be out of place.
- 1.6. References (page 34) provides a list of 10 publications without having a linkage with the text. If web linkages to each reference is provided, the publication would be more informative and helpful. This would also add scientific value to the publication.

2. SELECTING AND PURCHASING FOOD :

- 2.1. The elaborate information provided on 'Dos' and 'Don't Dos' regarding purchase of food items in most of the pages appears to be mostly of common knowledge. It is suggested that to make the presentation more focused, the 'Don't Dos' should only be listed. Besides, at present even in local shops packaged branded groceries are available. Most of the information listed appear to be somewhat rudimentary. Even a child would not accept rice or grains infected with fungus or bacteria. Such instructions should be avoided. For example, it is not feasible to purchase eggs after the "float test" as no shop selling eggs with other items would provide water to check eggs. Further, it is not clear if poultry produced eggs require such testing. Besides, quality controlled eggs beautifully packed are sold at Super Markets and at even local shops. In the circumstances, what is the feasibility of providing information, which is rudimentary.

- 2.2. With regard to cheese, it has been stated on page 2 that cheese or paneer that slimy to touch, has creamy yellowish discolouration should not be purchased. It is not feasible to have a touch of the cheese or paneer in the store before purchase. Secondly, most of the packages are coloured and colour of cheese is not visible. If 'expiry date' or 'best before' date has lapsed, it has been advised that the product should not be purchased. This is a rudimentary knowledge and all purchasers check this before buying any food material. Such rudimentary suggestions dilute the importance of the 'Pink Book'.
- 2.3. The information on selection of fats, oils and pulses that have been provided are of common knowledge and does not add to the wisdom or consumers. Instead, information on 'what to check' on the label of fats, oils, etc., like undesirable stabilisers, colouring materials, etc. should be provided. Secondly, the oils need to be classified in terms of 'saturated', 'unsaturated', transfat, etc. Most of the people do not know what these signify and what are transfats.
- 2.4. It has been stated that packets having contents with putrid smell, brine/syrup or which look cloudy, bubbly should not be purchased. Most of the packaged foods do not use transparent packaging material. It is also not possible for packaged food to emit smell. Besides, it is not clear what is meant by brine/syrup. It has been further suggested that spices which contain insects and the whole spices which contain powders should not be purchased. It is feared that such type of information may dilute the importance of The Pink Book and needs to be avoided.
- 2.5. There are a number of issues concerning misleading 'Labels' on packages which have been outlined under 'Claims and Clarifications'. These are indeed valuable information. It would, however, be more appropriate if the use of

misleading labels could be controlled by FSSAI at the point of production. For example, if a packed loaf of bread carries FSSAI logo and prints 'brown bread', how the consumer would know whether it is made of whole wheat or some natural colour has been added to make it look brown ? In fact, use of 'brown bread' should be prohibited. Instead 'atta' or 'whole wheat' bread should be stipulated by FSSAI.

- 2.6. Similarly, the 'cholesterol free label' is also important. The limit for saturated fats and transfats should be stipulated and controlled by FSSAI. Products having fats in excess of these limits should be prohibited in using 'cholesterol free' labels.
- 2.7. Further, the 'sugar free' label is also misleading consumers. Cream Cracker biscuits are being labelled 'sugar free'. It is not clear if these contain refined flour, starch, transfats, etc. and if so, sugar free is meaningless. These labels should also come under the scrutiny and stipulation of FSSAI.
- 2.8. There is a need to incorporate 'HACCP' and ISO-22000 on packaged and processed foods on page 5.

3. EATING HEALTHY FOOD :

- 3.1. The pyramid on page 19 conveys the basis issues concerning healthy food. The information provided, thereafter, is cramped and most of the suggestions are rudimentary. Instead, a few bullet points with user friendly language should be provided.
