

VOICE OF FICCI



SHAPING THE AGENDA

July 2022



From the
Director General

As India celebrates Azadi ka Amrit Mahotsav, 75 years of independence, it has paved the way to envision 100 Years of Independence - India@2047. The Ministry of Skill Development and Entrepreneurship has drafted the India@2047 vision document that includes the necessary interventions to support the skill development ecosystem. FICCI has shared a few inputs with the Ministry of Skill Development & Entrepreneurship for making the vision document more comprehensive. The suggestions include Convergence of all skill initiatives through MSDE; an Employability-led Skilling Ecosystem; Broaden the scope of entrepreneurship to include Mass Entrepreneurship and Inclusion of Education in the Employment stack.

Further, there is a need to attract additional funding for the higher education sector to meet enhanced GER targets and improve the quality of higher educational institutions. The Chamber has submitted recommendations to the Department of Financial Services, Ministry of Finance, to identify additional/alternate funding for growth of this sector. Also, FICCI has highlighted the need to ease out financing options to institutions.

Over the past decade, the private sector has greatly scaled up both its capability and capacity in defence. Moving further, the industry is keen to participate in R&D projects in partnership with DRDO through the Special Purpose Vehicle (SPV) provision that has been announced in the budget earlier this year. If implemented successfully, this proposed integrated approach will revitalize the defence ecosystem. FICCI has sought input from the industry to prepare a framework for the operation of DRDO-Industry SPV. The recommendations, should they be implemented, would be used as the standard operating procedure for future projects.

Meanwhile, while the worst is behind us, the COVID virus is once again resurfacing, and it is time that we once again gear up for our fight against COVID. I urge all of you to take a step back and switch to the basics of SMS (Sanitization, Mask and Social distancing).

Arun Chawla

Recommendation for Government funded Development by Industry-DRDO SPV

The industry looks forward to participating in R&D projects in partnership with DRDO through the Special Purpose Vehicle (SPV) provision announced in the budget earlier this year. Over the past decade, the private sector has greatly scaled up both its capability and capacity. If implemented successfully, this proposed integrated approach will revitalise the defence ecosystem.

FICCI has sought input from the industry to prepare a framework for the operation of DRDO-Industry SPV. The recommendations, should they be implemented, would be used as the standard operating procedure for future such projects. This was submitted to Secretary, Department of Defence R&D and Chairman, DRDO.

For detailed recommendation, please write to
Mr Vivek Pandit at vivek.pandit@ficci.com

Concern over increase of GST on capital goods used for Petroleum and Coal Bed Methane from 5% to 12% .2) Inclusion of Upstream gas producers under GST

The additional tax burden goes against the contracts signed by domestic E&P companies which assured zero custom duties on imports and local purchases under deemed exports. In order to ensure energy security and investments in the E&P sector, a stable fiscal regime and incentivisation of the sector is paramount to bring in investments.

We strongly urge you to reconsider this increase in the GST rates from 5% to 12% since there is no input tax credit available currently. Also, under the present GST Regime, the finished manufactured products are subjected to levy of GST but natural gas which is used as industrial input is subjected to VAT, for which no input tax credit is available. This has led to a situation where the VAT paid on procurement of natural gas is not available as credit resulting in working capital being blocked in the business cycle, increasing the cost of production and rendering medium and small industries economically unviable. This was submitted to Hon'ble Minister, Ministry of Finance, Government of India.

For detailed recommendation, please write to
Mr Vivek Pandit at vivek.pandit@ficci.com

'Voice of FICCI' is a service to all our members and shared with key policy makers and thought leaders. The document is a compilation of FICCI's views on macro-economic issues. These issues come to us directly from members, or through deliberations in conferences and seminars on sectoral issues, as also through Government notifications.

Impact of Special Additional Excise Duty (SAED) on Domestic Upstream Industry

The imposition of SAED will have adverse repercussions on the domestic E&P industry given that India is a net importer of energy in the background of highly volatile global crude prices. This assumes even more significance, given that India is facing declining domestic production for 8 years in a row and a simultaneously increasing oil import bill. In this context, the complex regulatory environment, including uncertainty over policy changes and changes to contract terms acts as a disincentive for investors particularly to Global E&P operators. Therefore, we are writing to request the government to reconsider this decision of imposition of SAED to mitigate and reverse the adverse impact on the industry. This was submitted to Hon'ble Minister, Ministry of Finance, Government of India.

For detailed recommendation, please write to
Mr Vivek Pandit at vivek.pandit@ficci.com

Submission on proposed amendments in IT Rules, 2021

Ministry of Electronics and Information Technology (MeiY) issued a draft amendment in the Information Technology Rules, 2021 in the first week of June, 2022 and asked for stakeholders' comments by the first week of July, 2022.

As it was cutting across different sectors, FICCI invited the views of different concerned verticals like Media & Entertainment (Social Media), Retail and FMCG, E-Commerce, Information Technology, etc and worked out a consolidated response based on the industry inputs.

Key points of the representation:

- FICCI supports MEITY's goal to ensure that the Internet is open, safe, trusted and accountable for Internet users in India and also welcome the remarks made to the press by the Hon'ble Minister of State for Electronics and IT, Shri Rajeev Chandrasekhar on industry coming up with a self-regulatory, grievance redressal mechanism. We would also take this opportunity to share industry concerns on the existing provisions under the IT Rules, which can be also addressed via the current amendment process.
- The pre-existing provisions of the IT Rules are sufficient to ensure that non-compliant information is taken down by the intermediary on receiving "actual knowledge". Therefore, the Proposed Amendment should be deleted and should not be considered at all.
- The Proposed Amendments under Rule 3(1)(m) and 3(1)(n) are redundant and should be deleted, as intermediaries already have existing obligations relating to publication and informing users about the intermediaries' terms of service and protect user privacy, ensure procedural transparency by providing notice and appeal mechanism.
- FICCI is grateful that MEITY has welcomed inputs from industry and the legal community to structure the appellate mechanism, including empowering the industry to set up a self-regulatory body. FICCI request a period of at least six months to develop and

adopt a self-regulatory grievance redress mechanism which would replace the GAC.

- The IT Rules already has special categories with stipulated timelines and the blanket approach of having a 72-hour turnaround time for complaints in relation to the blocking or removal of communication links is arbitrary and does not have any basis. Therefore, FICCI recommended that the Proposed Amendments with respect to the 72-hour time are rolled back and clarity is provided by MEITY with respect to the other proposed provisions.
- FICCI requested MEITY to further clarify the Rule on timeframe for grievance redressal and specifically stipulate 15 days as the timeframe for it by the industry.

For detailed recommendation, please write to
Ms Leena Jaisani at leena.jaisani@ficci.com

IBBI Discussion Paper on Streamlining the Liquidation Process

Based on inputs from members, FICCI has submitted its comments to ED, IBBI, on IBBI Discussion Paper on Streamlining the Liquidation Process.

For detailed recommendation, please write to
Ms Abha Seth at abha.seth@ficci.com

IBBI Discussion Paper on Financial Self-sufficiency of IBBI

Based on inputs received from members, FICCI has submitted its comments on IBBI Discussion Paper on Financial Self-sufficiency of IBBI.

For detailed recommendation, please write to
Ms Abha Seth at abha.seth@ficci.com

IBBI Discussion Paper on changes in the CIRP to reduce delays and improve the resolution value

Based on inputs received from members, FICCI has submitted detailed representation on IBBI Discussion Paper on changes in the CIRP to reduce delays and improve the resolution value.

For detailed recommendation, please write to
Ms Abha Seth at abha.seth@ficci.com

Disclosure requirements under Regulation 30 of SEBI LODR Regulations

SEBI is proposing a review of disclosure requirements for listed entities under Regulation 30 of SEBI (LODR) Regulations. Industry views have been submitted on the proposal to introduce threshold limit for disclosure of events specified under Para B of Part A of Schedule III and additional material events to be specified under Part A of Schedule III (Para A and Para B). It has been suggested that the disclosure requirement for the events specified in Para B of Part A of Schedule III should not be made binding by introducing threshold limits and should be left discretionary at the option of company's board as per their disclosure / materiality policy. Further, that Schedule III is fairly exhaustive, and additional list of events should not be prescribed.

For detailed recommendation, please write to
Ms Abha Seth at abha.seth@ficci.com

FICCI representations on RBI's guidelines for CICs relating to Specified User

Pursuant to the RBI Credit Information Companies Amendment Regulations, 2021 which introduced an additional definition/category of “specified users” (“an entity engaged in the processing of information, for the support or benefit of credit institutions and satisfying the criteria laid down by the Reserve Bank from time to time”), the RBI laid down the eligibility criteria for entities to be categorised as the same under clause (j) of Regulation 3 of the Credit Information Companies (Amendment) Regulations, 2021. Basis this development, it was anticipated that Fintech companies who are engaged in the activity of processing information for the support and benefit of credit institutions, pursuant to their respective tie-up arrangements with such credit institutions would be permitted to receive credit information in the capacity of “specified user” subject to fulfilment of the eligibility criteria laid down by the RBI. While industry completely agrees that the fintechs must comply with all such criteria, it is incumbent to highlight that the following criteria (serial no. 4) has raised concerns amidst the fintech industry and needs further clarity:

“4. In case of a company it shall be owned and controlled by resident Indian citizens/Indian company owned and controlled by Indian citizens”.

Since the majority of the prominent players in the country’s fintech industry have foreign investment in some form or the other, the above said condition appears to be a road-block in fulfilling the regulatory intent of uplifting the Indian fintech industry and providing a level-playing field with the traditional players.

In light of the foregoing, it is submitted that the regulator takes a pragmatic approach in interpreting/clarifying the aforesaid criterion keeping in tune with the regulatory intent and the growing needs of the industry. It may be borne in mind that for the Fintech industry, the majority of whom are start-ups, it is not easy to raise capital from domestic sources. Further, in the financial sector, even the biggest of the private sector banks and NBFCs have substantial foreign ownership and control and are yet not regarded as foreign companies in India. Hence, it is suggested that the following parameters are considered to signify the meaning and connotation of the words “owned” and “controlled” in terms of the said guidelines -

1. The company should be incorporated in India under the Companies Act, 2013.
2. The company’s day-to-day administration and operations should be delegated to and managed by professionals who are Indian residents highly qualified and experienced in their respective areas of expertise.
3. Further, the company should be subject to the supervision of the Ministry of Corporate Affairs (MCA) and the registrar of companies (Registrar) that administer the Companies Act 2013 and the relevant rules.
4. All offices of the company shall be physically located in India and all the members of management must operate from India.

In this context, it could be an added advantage if the company is already subject to the regulatory supervision of any other regulator like the SEBI or the PFRDA.

Further, it is also pertinent to mention that the industry is aware of and agrees with the regulatory concern of sensitive data being transferred to foreign nations and is fully open to comply with any safeguards (apart from the above) that may be needed to protect data sensitivity. The industry members stand ready to take all measures as advised by the regulator to ensure data localisation as per regulations and laws of the land.

On behalf of members of the Fintech industry, FICCI hence make this representation to you to kindly consider the above arising out of the RBI’s guidelines to CICs and as stated above, within the framework of rules and regulations in place to ensure compliance and strict safeguards for data security and consent we seek a fair level playing field between the FinTechs who have invested immense resources and banks and NBFCs regarding credit information and storage. This will help in better information processing and offer of better services to ultimate consumers. We also request a meeting with our members from the Fintech industry so that we can adequately make our representations regarding the more substantive portion of guidelines for the best interest of all stakeholders involved. This was submitted to Secretary, Department of Economic Affairs, Ministry of Finance & Secretary, Department of Financial Services, Ministry of Finance.

For detailed recommendation, please write to

Mr Anshuman Khanna at anshuman.khanna@ficci.com

NCVET DRAFT Guidelines for Blended Learning & Assessment for Vocational Education, Training and Skill Ecosystem

FICCI commends the initiative of NCVET to formalize the much-needed blended learning & assessment for the VE, Training, and Skill ecosystem. There are certain areas that could be looked into, which going forward would help in making the guideline more comprehensive. These were submitted to Chairperson, NCVET.

1. Inclusion of Design thinking concepts for students
2. Focus on the reinforcement and assessment of soft skills
3. Separate guidelines for IT and software-related job roles
4. Manufacturing-related job roles, and the job roles related to services
5. Inclusion of Cloud-based LMSs and eLearning
6. Elaboration on the concept of assessment on demand

For detailed recommendation, please write to

Mr Rajesh Pankaj at rajesh.pankaj@ficci.com

India@2047 – Vision for Skill Development and Entrepreneurship - Draft

The Ministry of Skill Development and Entrepreneurship has taken the revolutionary step by drafting the India@2047 vision document. The document includes the necessary interventions to support the skill development ecosystem.

FICCI is delighted to share with the Ministry of Skill Development & Entrepreneurship a few inputs for making the vision document more comprehensive.

1. Convergence of all skill initiatives through MSDE
2. Employability led Skilling Ecosystem
3. Broaden the scope of entrepreneurship to include Mass Entrepreneurship
4. Inclusion of Education to Employment stack

These were submitted to Under Secretary, Ministry of Skill Development and Entrepreneurship and Under Secretary, Ministry of Heavy Industries, Government of India.

For detailed recommendation, please write to
Mr Rajesh Pankaj at rajesh.pankaj@ficci.com

Working Group No. 4 (Healthcare & Education) - Constitution of Working Groups based on the deliberations during the Conference on 'Creating Synergies for Seamless Credit Flow and Economics Growth'

There is a need to attract additional funding to the higher education sector to meet enhanced GER targets and improve quality of higher educational institutions. The FICCI recommendations were submitted to Dept of Financial Services, Ministry of Finance, to identify additional/alternate funding for growth of the sector include specific inputs on:

- Long Term Financing Option for Education Sector
- Priority sector lending for Education
- Need to ease out financing options to institutions

For detailed recommendation, please write to
Mr Rajesh Pankaj at rajesh.pankaj@ficci.com

Appeal: Airconditioned Schools to be exempted from following Revised Schedule

FICCI ARISE submitted a recommendation basis a recent directive for Schools in Haryana to shut at 12pm given the heat conditions and keeping in view student's health and safety. The representation requested for the Govt. of Haryana to exempt schools that do have infrastructure like air-conditioning. This was submitted to Additional Chief Secretary (School Education), Government of Haryana.

For detailed recommendation, please write to
Mr Rajesh Pankaj at rajesh.pankaj@ficci.com

Submission of agenda specific representation post FICCI's Interactive meeting with Shri Arun Singhal, CEO, FSSAI

In the submitted representation, FICCI thanked CEO FSSAI for his valuable time and interaction with FICCI members on 21st April 2022. During the meeting many regulatory agendas were discussed and deliberated. FICCI submitted representations on the following agendas which were discussed during the meeting for your kind reference:

1. FSS (Fortification of Foods) Amendment Regulations: Increase the iodine limit for double fortified salt in comparison to regular iodized salt (as range 15 to 50 ppm).
2. FSS (Food Product Standards & Food Additives) Regulations: Allow the addition of steviol glycosides in bakery products (Food Category 07.2.1).
3. Frequently asked questions (FAQs) on Food Safety and Standards (Contaminants, Toxins, and Residues) Regulation, 2011.

For detailed recommendation, please write to
Mr Abhinav Singh at abhinav.singh@ficci.com

CIFTI-FICCI representation on "Malt Extract" standards specified under IS 2404:1993

In the submitted representation to BIS, FICCI shared comments on malt extract as:

1. We propose to add option for malted and / or unmalted grains of cereals as the end product of both is similar in nutritional aspects, under the clause 4.1.1.
2. We propose to add "requirement for malt Extract" parameter to align with FSSAI malt extract standard requirement.

For detailed recommendation, please write to
Mr Abhinav Singh at abhinav.singh@ficci.com

Request for nominations for EWG CCFH-Safe use and Reuse of water

FICCI submitted NCCP a list of officials for the EWG on CCFH-Safe use and Reuse of water.

For detailed recommendation, please write to
Mr Abhinav Singh at abhinav.singh@ficci.com

RESPONSE FORM: Codex Committee on Food Labelling Electronic Working Group on Allergen Labelling

In the submitted representation to NCCP, FICCI submitted response on questions asked on the "Codex Committee on Food Labelling Electronic Working Group on Allergen Labelling": 1st Consultation Paper.

For detailed recommendation, please write to
Mr Abhinav Singh at abhinav.singh@ficci.com

CIFTI – FICCI representation on amendment of FSS (Labelling and Display) Regulation 2022: Clause 5.2 (d) (1) and clause 7

In the submitted representation to FSSAI, FICCI proposed an amendment of the below mentioned clause:

- Clause 5.2 (d) 1: Labelling requirements: Provided that for ingredients falling in the respective classes, the following class titles may be used, namely: - Edible vegetable oil, where we proposed below mentioned option:

Option 1: The use of more than one oils may be grouped together under the designation 'Edible Vegetable Oil' immediately followed by list of all oils used in brackets with a phrase 'in varying proportion'.

Illustration 1:

..., Edible Vegetable Oil (__, __, __ in varying proportion)

Illustration 2:

..., Edible Vegetable Oil (__, __, __ and/or __ in varying proportion)

- Clause 7: Mandatory declarations, where we proposed an inclusion of below mentioned clause: “and for the food package with surface area up above 30 and up to 100 cm², the size of numerals and letters for such declarations shall not be less than 1.5 mm.”

For detailed recommendation, please write to
Mr Abhinav Singh at abhinav.singh@ficci.com

FICCI codex cell representation on CL 2022/12-FL: Request for information on sustainability labelling

FICCI submitted comments to NCCP, on the CL 2022/12-FL entitled “Request for information on sustainability labelling”. FICCI Codex Cell supports Codex establishing key sustainability labelling principles which start from the basis of the UN guidelines for providing sustainability labelling and specific recommendations, and additionally utilize the following 3 other principles:

- Be voluntary to implement, with harmonised rules if a company decides to label products
- Be practical to implement for companies
- Be harmonised across regions and ideally globally

We recommended consideration of the World Business Council for Sustainable Development (WBCSD) study on labelling, published in November 2021.

(Link enclosed: <https://www.wbcsd.org/q4zau>)

We proposed to consider, which aspects of sustainability labelling fall within the Codex Committee on Food Labelling mandate as well as the degree of maturity of the different sustainability aspects. Environmental information is generally more common, widespread, and understood, while economic and social aspects are not yet widely used, and experience is limited. The proliferation of environmental labelling, in particular, is a cause of concern as it can lead to consumer confusion and complexities for companies. We propose the need for overarching principles on environmental labelling being established by recognised authorities and therefore welcome this initiative by Codex.

For detailed recommendation, please write to
Mr Abhinav Singh at abhinav.singh@ficci.com

Request for comments to circular letter CL 2022/24/OCS-NFSDU (Standard for follow-up formula)-CCNFSDU-Reg

In the representation, FICCI CODEX Cell submitted comments to NCCP on review of the Standard for follow-up formula as:

- FICCI Codex Cell supports option a) One standard with two parts: Part A covering Follow-up Formula for Older Infants and Part B covering Product for Young Children as a more pragmatic way forward. This option is in line with the way the Standard had been developed and elaborated with a clear distinction between the two products emphasized by the clear separation between part A and part B. The current format establishes numerous cross

references between parts A and B and that having both parts under one Standard facilitates the reading of the respective requirements.

- FICCI Codex Cell is of the opinion that the Standard does not require a preamble.

For detailed recommendation, please write to
Mr Abhinav Singh at abhinav.singh@ficci.com

CIFTI – FICCI representation on “FSSAI Direction dated 17th June 2022 regarding operationalization of FSS (Labelling and Display) Amendment Regulations 2022”

FICCI submitted comments on “FSSAI direction dated 17th June 2022 regarding the operationalization of FSS (Labelling and Display) Amendment Regulations 2022.”, where we had requested for a specific note as stipulated in parentheses below for allowing the use of interchangeable phrases “pregnant and lactating mothers” or “pregnant or lactating women” since this does not waiver the overall intent of this specific labelling; whereas the latest direction issued on 17th June 2022 has changed the phrase to “pregnant or lactating women”.

(The phrase “pregnant and lactating mothers” may interchangeably be used as “pregnant or lactating women” regarding mandatory declarations for sweeteners as above.)

To address the practical challenge of implementation of the revised declaration within such a short time, we requested that the new sweetener declaration is not enforced till such direction dated 17th June 2022 is issued as a final notification.

We also addressed the challenges in complying with the tolerance limit of $\pm 20\%$ for the declared nutrients as per the Direction dated 17th June 2022. As per the Labelling and Display regulation, tolerance was first proposed to be -10% . Basis multiple industry representations on the difficulties faced by industry in complying with the tolerance limit, the Authority had kindly agreed to issue a Direction dated 22nd Oct 2021 giving relief on the matter of tolerances and Nutritional information. In this order, tolerance was based on “established practices” per details given in the existing Food Safety and Standards (Packaging and Labelling) Regulations (Order copy attached). Now as per the 17th June 2022 order, clause (c) thereunder industry is in a precarious situation, since Nutritional information based on the interpretation of erstwhile Oct 2021 Directions becomes redundant and currently running products in the market may become non-compliant in many cases if $\pm 20\%$ is enforced on ground by food safety inspectors.

Hence, we requested the authority to maintain the status quo of the tolerance limit as per the Direction dated 22nd Oct 2021 and request to remove clause (c) from the 17th June 2022 Direction.

For detailed recommendation, please write to
Mr Abhinav Singh at abhinav.singh@ficci.com

Review of Indian Standard for Papad- IS 2639: 1999

FICCI submitted comments to BIS, on the Review of Indian Standard for Papad - Specification as per IS 2639: 1999, as:

- The nomenclature of Papad shall include Papadam and Appalam. The terminologies are very common in different parts of the country.
- The scope of ingredients allowed to be used must be expanded by revising individual enlisted flours and sago as cereal and cereal products like cereals flours, pulse flours, millet flours, processed soya flour, sago. Further, in market various varieties of papad (Lahsun papad, Lal mirch papad, Garam masala papad etc.) are present. Herein, fruits and vegetables, spices, herbs and condiments are used, hence, the list of ingredients must allow addition of these as well.
- Commonly available papads in market have food colourants obtained from the fruits, vegetables, spices and herbs. We propose to include these as additional colouring foods. To omit redundant quality parameters like Total ash, Alkalinity of ash as sodium carbonate, pH of water extract, Fat and Crude fiber which are non-relevant for a finished cereal product and only increase compliance burden. They also restrict innovation and decrease consumer palatability.
- To increase effectiveness of the standard, while the scope of essential composition be increased, the quality parameters must be restricted to parameters relevant for finished food products. Having irrelevant/large number of standards will not only affect the innovation in the industry in terms of both processes and products but will also adversely impact the livelihood of many women who are engaged in papad manufacturing while working from their homes.

For detailed recommendation, please write to
Mr Abhinav Singh at abhinav.singh@ficci.com

CIFTI - FICCI representation on FSSAI draft notification: FSS (Alcoholic Beverages) Regulations, 2018

FICCI submitted comments to FSSAI, on "Draft Food Safety and Standards (Alcoholic Beverages) Amendment Regulations, 2022", as:

We proposed the inclusion of Column Still under the clause Part 2, in regulation 2.8, in sub-regulation 2.8.1, for clause (i) Single malt or Single grain whisky, based on the following:

1. Grain whisky distillation in pot still is not feasible due to its high dissolved solids.
2. Column still is widely used to distill alcohol produced from grain mash.
3. All Grain Scotch Whisky industry and American Whiskey industries follow column still for Grain Spirit production for blending Grain Whisky.
4. Production process for Malt Whisky and Grain Whisky is different from wort preparation step itself hence distillation options of Pot and Column shall be made available.

For detailed recommendation, please write to
Mr Abhinav Singh at abhinav.singh@ficci.com

CIFTI-FICCI representation on 39th Agenda Number 39.3 (Food Safety Compliance)

FICCI submitted comments to FSSAI, on the 39th Food Authority agenda item number 39.3 (Food Safety Compliance). We also stated that many changes have been made live in the FoSCoS portal like document requirements and selection of closest category for proprietary food, mapping of Category 99 etc, which are still under discussion and has not been finalised as a regulation or guidance document. This at times is leading to enormous confusion at FBOs or even at the enforcement level. Hence our humble submission in this regard was that we should put in place a system by which industry will be informed through a draft notification about the forthcoming changes in FOSCOs before making it live for an open consultation.

For detailed recommendation, please write to
Mr Abhinav Singh at abhinav.singh@ficci.com

First meeting of CCG3 (Foods of Plant Origin) Subgroup on Spices and Culinary Herbs for CCSC6 - reg.

FICCI CODEX Cell submitted comments to NCCP, on various agendas of CCSC6 such as: Draft standard on Saffron, Nutmeg, Cardamom, etc.

For detailed recommendation, please write to
Mr Abhinav Singh at abhinav.singh@ficci.com

CIFTI - FICCI representation on FSSAI Draft Notification on FSS (Food Products Standards and Food Additives) Amendment Regulations, 2022 dated 31st May 2022

FICCI submitted representation to FSSAI, on the "Draft Notification on FSS (Food Products Standards and Food Additives) Amendment Regulations, 2022 dated 31st May 2022" as:

- We proposed to revise the description of Peanut Butter.
- We proposed to revise the protein parameter of Peanut Butter.
- We proposed to revise the value of the parameter "Moisture and insoluble impurities (% by wt. Max)" of Corn Oil.
- We proposed to revise the value of the parameter "Acid Value" of Corn Oil.
- We proposed to delete Uric Acid, Yeast and Mould, and Aerobic Plate Count as parameters from clause 24(a) Rice Flour for preparation of Fortified Rice Kernel (FRK).
- We proposed that Micronized D50 (1-3 µm) should also be permitted as a particle size parameter under the clause 24(b)(5) Vitamin-Mineral Premix for Preparation of Fortified Rice Kernel (FRK).
- We proposed to revise the food category 3.3.3: Oligofructose.

For detailed recommendation, please write to
Mr Abhinav Singh at abhinav.singh@ficci.com



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