



**Breastfeeding
Promotion Network of India**
(Registered Under Societies Registration
Act XXI of 1860, Delhi R.No. S-23144)
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BPNI/2018/015

January 31, 2018

To,
Shri Pawan Kumar Agarwal,
Chief Executive Officer (CEO),
Food Safety Standards Authority of India (FSSAI)
FDA Bhawan, Near Bal Bhavan, Kotla Road, New Delhi, Delhi 110002

Sub: FSSAI & IYNCI partnership "Diet4Life" posing threat to the health of million babies by undermining IMS Act.

Dear Shri Pawan Kumar Agarwal,

Greetings from Breastfeeding Promotion Network of India (BPNI) !

1. BPNI is a 26-year-old organisation that works to protect, promote and support breastfeeding and infant and young child feeding in India in particular on the policy. BPNI is notified in the gazette of India to check with compliance with the *Infant Milk Substitutes Feeding Bottles, and Infant Foods (Regulation of Production, Supply and Distribution) Act 1992, and Amendment Act 2003(IMS Act)* and initiate legal action where necessary.

2. The IMS Act aims to regulate production, supply and distribution of all foods for consumption of children under the age 2. This law was enacted to control marketing of baby foods in India with a spirit to protect millions of mothers and babies from commercial influence of these very companies which leads to inappropriate feeding practices contributing to child malnutrition, disease and death.

3. This is with reference to FSSAI's partnership project "Diet 4 Life" with Infant and Young Child Nutrition Council of India (IYNCI), which is a front organization of 4 leading baby food manufacturers Abbott, Danone, Mead Johnson and Nestle.

4. Under this project FSSAI has undermined the IMS Act, a central Act of Parliament by allowing the above said manufacturers under this project to be exempt from provisions of IMS Act. FSSAI has also issued a notice for public comments proposing such exemption to foods for special medical purposes (FSMP). (Annexure-1)

5. Ironically, under the disguise of this partnership baby food manufacturers who are meant be regulated are being provided government platform as well as given a free hand to promote their products/sponsorship of health workers conferences, and contact parents directly which is banned under the IMS Act.

As a policy, BPNI does not accept funds of any kind from the companies manufacturing baby foods, feeding bottles etc. and from organization/industry having conflicts of interest.



6. Unsurprisingly, these baby food manufactures have already been involved in sponsorship of doctors and gifts to Hospitals. (Annexure -2), which blatantly violates section 9 of the IMS Act.

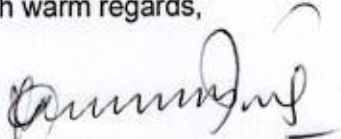
Therefore,

7. BPNI requests you to withdraw the exemption given to these foods through "Diet 4 Life" or the proposal in the notice issued to uphold the sanctity of IMS Act and not to undermine it.

8. BPNI also wishes to draw your attention to the guiding principles of the National Nutrition Strategy of Government of India launched last August by the VC, Niti Aayog. Recognising this project to be a serious institutional conflicts of interest, BPNI calls upon FSSAI to call off this partnership with IYNCI.(Annexure-3)

BPNI thanks you for your attention and time to discuss this issue.

With warm regards,



Dr. Arun Gupta
Central Coordinator BPNI
Regional Coordinator IBFAN Asia

Cc: - Dr. Rajiv Kumar, Vice chairman, NITI Aayog, Chairperson, National Council on India's Nutrition Challenges,

Cc: - Ms. Preeti Sudan, Secretary, Ministry of Health & Family Welfare

Cc: - Shri Rakesh Srivastava, Secretary, Ministry of Woman and Child Development.