

Top three issues under Food Safety Standard Act faced by the industry are:

- I. Lack of Testing Facilities / Infrastructures,**
- ii. Less Trade and Industry Representation and**
- iii. Lack of Transparency.**

1. Confederation of all India Traders opines that every Association, Business Chambers, Food-grains Merchants Association, Mahila Bachat Gat, Kutir Udyog etc. Ought to take strong exception to the implementation Food Safety and Standards Act 2006.
2. According to confederation the Act has been a death blow to Indian food industry and many of the clauses are not appropriate to the prevailing trade situation and are ambiguous. Unless changes are effected in the Act.
- 3- Lakhs of workers will be rendered jobless. That we have to demand, among other things, referral laboratories in every district and analysis of products at minimal cost, single license system for food business operator and enough time to adopt announced change in labeling. The penalty levied, if any, should be a maximum of Rs 25,000 only, it said and sought enough representation for trade in Central advisory committee on FSSAI.
The Act is stringent and the small traders would be affected severely. According to us the Sec 63, dealing with punishment for carrying out a business without license — six months imprisonment and a fine up to Rs 5 lakh is extremely harsh and should be reconsidered
4. The stringent standards prescribed in the Food Safety and Standards Act will adversely affect small manufacturers and traders of food products.
That many villages in the country were yet to have easy access to potable drinking water. After implementing the stringent standards immediately IT would result in small traders in rural areas losing out to multinationals.
5. Need For awareness- That adequate levels of awareness should be created and food business operators educated to raise their business to the standards expected by the Food Standards and Safety Authority. For an initial period of three years, no prosecution should be initiated for contravening the norms of registration, licensing, and hygiene standards.
6. One accredited food analysis laboratory should be established in all districts before the Act is enforced as, at present, the number of such laboratories was insufficient.
7. The Agro Chamber also called for dropping the provision requiring the food business operator to obtain all documents prescribed. This provision is “expensive and time-consuming,” and will greatly affect the small players.
That for reducing the licensing fee from its present levels of Rs.5,000 for petty traders and street vendors and Rs.10,000 for others.
8. There is an urgent need to upgrade the current infrastructure and to create more to meet the needs of the growing sector,” suggesting that quality assurance labs should be upgraded with all scientific instruments for the proper testing of raw and finished products.
9. That the new act has several clauses which are not practically possible to implement in Indian context.
10. That according to CONFEDERATION in the event of enforcement of this Act in the present form, it will lead to the closure of over 17 lakh Indian food industries and will force unemployment on over 20 million people.
11. That while there can be no controversial opinions in punishing severely those found guilty of adulteration, at the same time, the honest traders should not be punished. The proposed FSSA 2006 imposes fine over 100 times when compared to the existing PFA Act. Such a hike is

unheard of anywhere in the world. There is a clear difference between deficiency to follow an act and committing wilful offences. The law should give opportunity to set right the deficiency as well as to correct the mistakes. The maximum penalty should be Rs 25,000 instead of proposed Rs 10 lakhs. There are a number of such anomalies.

12. To rectify the anomalies in the FSSA, we have to have an effective steps at the earliest. The Food Security Bill has been tabled in Parliament without adequately taking into consideration the reforms required in agriculture production, marketing and public distribution.