Mr. Ashok Sinha Secretary Department of Food Processing Industries Ministry of Food Processing Industries Panchsheel Bhawan Khelgaon, August Kranti Marg New Delhi 110049

Dear Mr. Sinha,

You may have read that the Centre for Science and Environment (CSE) recently released a study on edible oils, checking for trans fats and for other fatty acids. We are deeply concerned by our findings about trans fats and the lack of standards in vanaspati and are sending you a copy of our magazine, *Down To Earth* (February 1-15, 2009). More information and a complete copy of the laboratory study are available on our website: http://www.cseindia.org/oil/index.htm.

We are writing to inform you of our findings and also hope you will intervene in this matter, as it is serious and urgent. The following issues emerge from our study:

1. Lack of standards for trans fats and inadequacy of food labelling requirements:

Our study analysed all major brands in the market. It found trans fats in all samples of vanaspati oils. This is particularly serious as trans fats are accepted to be deadly for our health and especially bad for the heart, as they reduce the amount of good cholesterol (HDL). It is for this reason that all across the world, trans fats in oil are being banned or tightly regulated. After Denmark, most US states have taken the decision to ban or restrict trans fats in restaurants.

CSE's Pollution Monitoring Lab tested 30 samples of branded oil widely available in the market. The total fatty acid profile (saturated and unsaturated) comprising 37 components and nine trans fats was analysed. The samples comprised vegetable oils such as soybean, sunflower, mustard and coconut, partially hydrogenated (vanaspati) oils, desi ghee and butter. They were tested according to the internationally used methodology of the Association of Official Analytical Chemists (AOAC) for fatty acids analysis (Method 969.33 Fatty acids in Oils and Fats). The tests found that in all vanaspati brands, trans fat levels were five to 12 times higher than the world's only standard for trans fats in oil, set in Denmark, at 2 per cent of the total oil.

It is now well understood in the world of food science that trans fats are found in cooking oil because of the industrial process of hydrogenation, which industry prefers because it can sell oils that have longer shelf life and are easier to use.

What is most shocking is that the Union Ministry of Health and Family Welfare's own sub-committee, recommended the urgent setting of standards for trans fats. But as yet, nothing has happened. In 2004, the Union health ministry's Oils and Fats Sub-committee, under the Central Committee for Food Standards, began discussions on a standard for trans fats. In January 2008, the sub-committee forwarded its recommendations to the Central committee for setting the standards on trans fats. But the Central committee is still awaiting more data and information.

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Instead of standards, in September 2008, the Union Health Ministry issued a notification for labelling of trans fats on oil and food. But without a legal binding standard, this notification of labelling is meaningless. So today, oil companies get away by giving the composition in a range: Rath vanaspati, for instance, says its package has 8-33 per cent trans fats. This would mean that the product has 15 times higher trans fats than the Danish standard. Another oil company says, it has trans fats in the range of 15-55 per cent. This makes a complete mockery of the science of food regulations. And clearly cannot be acceptable.

2. Lack of regulatory control in advertisements on nutritional claims

The CSE laboratory also tested other brands of edible vegetable refined oil available in the market. The other brands tested did not have trans fats but were still very far from the 'perfect healthcare solution' that most of them claimed to be. In fact, the study has found that it is impossible to say with certainty which oil is the best. Manufacturers claim advantages, which just cannot be adequately cross-checked and verified.

In this existing climate of misinformation and half-baked information, nutritionists recommend, "the best oil is one used in moderation and switched frequently to get the maximum nutrition value."

Our recommendations are as follows:

- The Ministry of Health and Family Welfare must set stringent standards for trans fats in vanaspati urgently, based on the recommendations of its own subcommittee.
- 2. The government must have an ongoing programme to fund research on cooking oils in the country, in particular to study the oil and diet combination and to undertake research on Indian oils.
- 3. As the quality of oil is critical for our health, we should bring oil certification under mandatory provisions and all efforts must be made to regulate the 'business' of nutrition claims.

We do believe food safety issues are important for the future health and wellbeing of the country. But most importantly, we have to build the credibility and integrity of our food safety institutions, which are today seen weak in the face of growing industry presence in our food. We must realize that like the US, we are beginning to see large and consolidated interests in our food, which if not managed through a strong regulator, could be disastrous for our health.

We will look forward to your comments and your help to address these urgent health issues.

With warm regards,

Yours cordially,

Sunita Narain

Encl: As above