School Canteen Policy: Where do we stand?

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FSSAI’s draft regulation

Food Safety and Standards (Safe and Wholesome Food for School Children) Regulations, 2018 (“the 2018 Draft Regulation”) – released in February, 2018

• Categorises food into: green, yellow, red and seeks to regulate availability (Schedule II)

• Some issues:
  – Not mandatory
  – Categorisation not as per recommendations of expert committee
Roadmap to 2018 draft regulation

• 2010 – PIL filed in Delhi High Court to regulate availability of junk food in and near schools – Uday Foundation
• 2013 – interim order of Court - public health experts be involved in framing guidelines for making available quality and safe food in schools
• February, 2015 - Decision of Delhi High Court
  In the context of guidelines for making available quality and safe food in schools, developed by FSSAI, the court said
  “We therefore direct the FSSAI to within three months herefrom give the said Guidelines the form of Regulations or directions and to further take appropriate steps for ensuring enforcement thereof
  ....
  As far as the schools outside Delhi are concerned and most of which are affiliated to CBSE, we feel that if is possible for CBSE to impose abidance with the Guidelines as a condition for affiliation, the same may also go a long way in ensuring compliance with the said Guidelines.”

Four years later, no regulation in place, only a week draft regulation!
Since Feb, 2015, ball is in FSSAI’s court

- October, 2015- 8 months after the HC decision, FSSAI makes draft guidelines for making available wholesome, nutritious, safe and hygienic food to school children in India
- Over 2 years after Delhi HC judgment - May, 2017 - another report - Report of FSSAI’s expert group on salt, sugar and fat
Meanwhile, some action taken by other stakeholders

- National Commission for Protection of Child Rights - wrote to state boards, secretaries of education, chief secretaries of states and state commissions for protection of child rights
- January, 2016 - CBSE Circular - Promotion of Healthy Snacks in Schools affiliated to CBSE - advised to all the schools affiliated to CBSE to implement the recommendations of the report
- Action taken in some states by education departments or state commission for protection of child rights : Punjab, Manipur, Orissa, Chandigarh, Madhya Pradesh

However, all recommendatory in nature. Voluntary efforts have limited effects.
2018 draft Regulation: Analysis

- Weakest point – not mandatory – defeats the purpose

Schedule II is titled ‘**General guidance** for selection of foods’ & states that “**School authority shall try to ensure that the FBO supplying school meals in the school premise is identifying and selecting foods to be served / sold on the basis of the guidelines given in table 1 of Schedule II**”

- On categorisation of food items

<table>
<thead>
<tr>
<th>Category</th>
<th>What the FSSAI led expert committee had said</th>
<th>What the 2018 draft regulation did</th>
</tr>
</thead>
<tbody>
<tr>
<td>Green Category</td>
<td>Food items which can be eaten regularly without any harm, should always be on the menu and constitute 80 percent of the options</td>
<td>Includes 100 % fruit juices and breakfast cereals</td>
</tr>
<tr>
<td>Yellow Category</td>
<td>Food items that should be eaten sparingly since their regular consumption could be unhealthy</td>
<td>Packaged soups, packaged juices, ice-creams, biscuits (not all ice creams and biscuits can be in this category)</td>
</tr>
<tr>
<td>Red Category</td>
<td>Standardised HFSS packaged food items, which are typically ultra-processed</td>
<td>Fresh non-standardized foods items placed in this category</td>
</tr>
</tbody>
</table>
### Rationale behind expert group guidelines (1/2)

<table>
<thead>
<tr>
<th>Colour</th>
<th>Description</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Green</td>
<td>Always on the menu: fresh foods</td>
<td>Vegetables and legumes, fruits, grain (cereal) foods; mostly wholegrain and/or high in fibre, lean meat, egg, fish etc</td>
</tr>
<tr>
<td>Yellow</td>
<td>Select carefully - Approach should be greening, small portion size and reduced frequency</td>
<td>Baked vegetable based snacks, ice creams, milk-based ices and dairy desserts etc</td>
</tr>
<tr>
<td>Red</td>
<td>Not on the menu - Banned from schools as they are high in fat, salt and sugar</td>
<td>Energy drinks, carbonated and other sweetened beverages, Fried packaged foods, chocolates, potato fries</td>
</tr>
</tbody>
</table>
Rationale behind expert group guidelines (2/2)

• Red category – most common ultra-processed packaged food and fast food
  – Information on ingredients is easily available
  – They are aggressively marketed and targeted at children
  – There is no option to make them green.
• There should be no HFSS food in ‘green category’
• At the similar level of salt or sugar or fat, a fresh food item such as a ‘samosa’ or a ‘nimbu pani’ is a better alternative than an ultra-processed packaged food item such as burger or a soft drink. This is due to absence of several additives and chemicals in fresh foods and presence of higher levels of nutrients and dietary fibre which are otherwise not retained in ultra-processed foods.
The way ahead

• Make 2018 draft regulation the mandatory
• Fix categorization of food items based on expert group recommendations
• Its high time, make it the law!
THANK YOU

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