



FSSAI notice seeks comments on amended children's supplement regulations

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FSSAI has issued a notice seeking suggestions and comments on the amended regulations related to supplements for children in the age group of two or three.

“Called the Food Safety and Standards (Food Products Standards and Food Additives) Amendment Regulations, 2018, the regulations, relating to standards of formulated supplements for children (the draft has been notified as complementary foods for older infants and young children) is aimed at additional energy and nutrients to complement the family foods derived from local diets by providing those nutrients that are either lacking or are present in insufficient quantities,” it stated.

The suitable raw materials prescribed under the draft include cereals, legumes, pulses, oil seed flours and oil seed protein products, animal source foods, fats and oils, fruits and vegetables, milk and milk products and other ingredients like digestive carbohydrates, protein isolates, probiotic ingredients, etc.

Under the essential requirements prescribed in the draft,

- Energy density shall be at least 4kcal per g on a dry basis;
- Protein digestibility corrected amino acid score (PDCAAS) shall not be less than 70 per cent of the World Health Organization (WHO) amino acid pattern for children between the ages of two and five. Protein shall be minimum 15 per cent with protein efficiency ratio (PER) of two or minimum 20 per cent with PER of 1.75
- Moisture: Maximum per cent by weight is eight;
- Fat: Maximum per cent by weight is 7.5;
- Total ash: Maximum per cent by weight is 7.5, and
- The product shall conform to the microbiological requirements of the follow-up formula given in Appendix B of the Food Safety and Standards (Food Products Standards and Food Additives) Regulations, 2011

The draft also listed out the additives that can be used for the formulated supplement.

Vaibhav Kulkarni, chairman, technical and regulatory committee, Health and Dietary Supplement Association (HADSA), said, “Presently, there is no specific formula or

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standard food for the age group (between two and three), and these standards would fill the gap. This could be complementary to the normal foods.”

However, he pointed out that the draft was not a well-thought-out one and needed considerable improvement.

“The nutrient requirements are based on per 100g basis, whereas it should have been per 100kcal basis to take into account the reconstitution. This is important, as the product is likely to be reconstituted in milk or water prior to consumption. I cannot understand the basis of setting up the standards,” Kulkarni added.

The draft stated that vitamins and minerals may be added, making it optional. Looking at the age group, a few key nutrients, like Vitamins A, C, B1 and B12, calcium, iron, zinc, iodine, etc., should be made mandatory.

Zinc is still treated as a metal contaminant. The upper limit will be 12mg, which is one recommended dietary allowance (RDA).

The standard for fat is 7.5 per cent maximum. That means it can be even zero, which will make the food imbalanced. Thought should be given to the distribution of energy among protein, carbohydrates (CHO) and fats in line with the recommendations of the National Institute of Nutrition (NIN), Hyderabad.

The product should not contain both partially- and fully-hydrogenated oil.

Products with cereals and pulses is not likely to taste great. Flavours will be required. Only vanilla is permitted. Other flavours too must be permitted. Presently, there are no restrictions on the use of flavours in products meant for children over the age of two. The same should be applicable to this product too.

Kulkarni added that the envisaged could be a concentrated source of nutrients, which could take care of a significant percentage of RDA and the rest can be taken care of by other normal foods.

“It would serve a better purpose if the product is a part of the mid-day meal (MDM) programme in schools, etc. The government should buy such supplements from companies [who could manufacture such products at a nominal profit as a part of their corporate social responsibility (CSR) initiatives and distribute it to schools,” he suggested.