



**CAG**

Citizen consumer and civic Action Group



# **THE REUSE OF COOKING OIL IN STREET FOOD VENDING**

**A study on the usage, consumption,  
and awareness of reused cooking oils  
among street vendors in Tamil Nadu**

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**Disclaimer:** The information in this report is based on a study conducted by CAG across thirteen districts of Tamil Nadu. The authors accept no liability whatsoever for any direct or consequential loss arising from the use of this document or its contents.

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# **About CAG**

CAG is a 36-year-old non-profit and non-political organisation that works towards protecting citizens' rights in consumer, civic and environmental issues and promoting good governance processes including transparency, accountability and participatory decision-making.

# **Glossary and abbreviations**

**FSSAI** - Food Safety and Standards Authority of India

**RUCO** - Repurpose Used Cooking Oil

**PHVO** - Partially Hydrogenated Vegetable Oil

**TFA** - Trans fatty acids

**WHO** - World Health Organisation

**REPLACE** - REview Promote Legislate Assess Create awareness Enforce

**TPC** - Total Polar Compounds

**NCDs** - Non-communicable diseases

**FBO** - Food Business Operator

**UCO** - Used Cooking Oil

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# Executive Summary

CAG has been working on implementing trans fat regulations in the state of Tamil Nadu since 2019. It has been frequently reported that used cooking oil from big hotels/restaurants/ sweets & savouries shops finds its way to smaller food establishments like street food vendors, for reuse. A previous audit by CAG also indicated that the knowledge about the risks of re-use of cooking oil among the general public was poor ([A survey to understand trans fats awareness in Tamil Nadu](#)). Considering this and the harmful effects of reheating used cooking oil, CAG undertook a study of street food vendors, to understand their cooking-oil consumption patterns and their awareness of FSSAI's RUCO initiative. Based on the outcome of the study, CAG aims to strategize its approach to implementing the trans fat regulations in the state of Tamil Nadu.

The outcome of the study was as expected on many fronts: the majority of street vendors said that they top up used oil with fresh oil; reused the oil until it got exhausted; used the reused oil for other purposes; were not aware of the RUCO initiative. The study reveals that although usage of PHVOs like vanaspathi is minimal among the vendors, the practice of reusing and reheating oil is high. While there have been several media reports that smaller vendors buy used oil from a larger establishment, to use again, our study does not bear out these findings. If small-scale vendors *are* buying used oil, to reuse, it appears that they are reluctant to admit to it. The findings from this survey is at odds with the information obtained from officials and other sources about the rampant re-sale of used oil amongst food business operators. This disparity raises related questions such as why food vendors are reluctant to share this information; and how we arrive at the real scale of the problem. We need further monitoring and enforcement by food safety authorities to address these issues.

## 1 INTRODUCTION

Tamil Nadu is famous for its varied culture, places of worship, festivals and the assortment of traditional cuisines it provides. Every region in the state has its own distinct flavour and food types. These are prepared and sold by small, medium and big food business operators, in order to meet the needs of the varied sections of society. It's a thriving business and an important source of livelihood for all involved in this trade. Cooking oil is a major component in preparing these food items, several of which are typically fried. Very often, this oil is used multiple times, before it is topped up with fresh oil, and used yet again. Upon the repeated use of the oil for frying,

several key properties of the oil are destroyed and essential properties altered, says the FSSAI. These newly altered properties are toxic to human health. It is scientifically proven that repeated heating of cooking oil produces trans fat and these artificial trans fat are a health hazard to humans, associated with diseases varying from cardiovascular conditions, diabetes, hypertension, atherosclerosis, Alzheimer's disease, to liver and kidney failure.

## **1.1 Background on Trans fats**

Trans fatty acids (TFA), commonly called trans fats, are broadly of two types: naturally occurring and artificially produced. Natural trans fats are found in meat and dairy products. Artificial trans fats are industrially produced by a process called partial hydrogenation of vegetable oils (PHVO). PHVOs are found in vanaspati, margarine, and bakery shortenings. Vanaspati is used in the preparation of Indian traditional sweets (mithais) such as laddoo, imarti, jalebi, and deep-fried foods such as aloo tikki and bhatura. Margarine and bakery shortenings are the most common fats used in bakery products like cakes, pastries, and puffs. It is estimated that the 2017 global market volume of partially hydrogenated oils – the main source of industrially-produced trans-fatty acids in food – was approximately 13.6 million tonnes. ([WHO's REPLACE](#))

TFAs are also produced during the repeated heating of cooking oil, which will be the subject of this report. This is because the process of re-heating of cooking oils creates chemicals known as TPCs. These TPCs (peroxides and hydroperoxides) are known to be directly proportional to the toxicity of the chemical that produces trans fats. The toxicity of these chemicals is implicated in the increased incidence of various non-communicable diseases.

Consumption of trans fats is associated with an increased risk of heart disease. Eliminating industrially-produced trans-fatty acids can save 17 million lives over the next 25 years. According to 2017 estimates, India has the highest burden of heart disease deaths due to high trans fat intake out of all countries in the world. There are more than 1.5 million deaths each year due to coronary heart disease, and nearly 5% of these deaths each year (71,000) can be attributed to trans fat intake ([WHO's REPLACE](#))

## **1.2 Policy Framework**

Recognising the ill-effects of trans fat and to regulate it, the government of India notified the “*Food Safety and Standards (Food Products Standards and Food Additives) Regulation, 2011 (FSSR)*” which mandated for trans fatty acids to be not more than 10% by weight in interesterified vegetable fats, margarine, *vanaspathi* and bakery shortenings ([FSSR, 2011](#)). In 2015, the FSSAI amended the regulations to reduce trans fat limit to 5% by weight. Later, in 2020, the FSSAI amended the regulations further to reduce trans fat in oils and fats to be less than 3% by weight effective January 2021 and less than 2% from January 2022. ([FSSAI notification dated 29/12/2020](#)).

In addition, by amending the Food Safety and Standards (Prohibition and Restrictions on Sales) Regulations, 2011, the FSSAI has said that food products that use edible oils and fats as an ingredient should not contain industrial trans fatty acids more than 2% by mass of the total oils/fats present in the product, starting January 1, 2022. ([FSSAI notification dated 02/02/2021](#)).

Globally, WHO launched REPLACE in May 2018, an action package to eliminate industrially-produced trans fat from the global food supply by 2023. WHO recommends that the total trans fat intake be limited to less than 1% of total energy intake by 2023. According to WHO’s REPLACE third annual report released in December 2021, around 40 countries have enacted best practice policies to eliminate trans fats and around 18% of the global population benefit from it. These best practice policies limit industrially produced levels of trans fats to 2% or less of total fats in all foods ([Countdown to 2023: WHO report on global trans-fat elimination 2021](#)).

It is scientifically proven that repeated heating of cooking oil produces trans fats. Hence, in 2017, FSSAI introduced a program called ‘*Repurpose Used Cooking Oil (RUCO)*’. The aim of the program was to limit the repeated use of cooking oil within the food supply chain ([RUCO](#)). As per the direction under Section 16 (5) of *Food Safety and Standards Act, 2006* on disposal and collection of used cooking oil, FBOs whose consumption of edible oil for frying is more than 50 litres /per day, should dispose of the used cooking oil to agencies authorised by the FSSAI or Commissioner of Food Safety of States/UTs effective since 2019. According to the FSSAI all FBOs regularly monitor the quality of oil during the process of frying in order to avoid the consumption of degraded oil that has turned toxic ([RUCO](#)).

The oils thus collected are used in the production of biofuels. According to the National Policy on Biofuels 2018, biofuels are fuels derived from renewable resources that are used in place of or blended with diesel, petrol, or other fossil fuels for



transportation, stationary, portable, and other applications. The main goal of the RUCO program is to ensure that biofuels produced from local feedstock are made available as fuel. According to the FSSAI policy, biodiesel is defined as a biofuel made from non-edible vegetable oils, acid oil, UCO, or animal fat and bio-oil. The policy targets a blend of 5% biodiesel in regular diesel by 2030. FSSAI's EEE strategy - Education, Enforcement, and Ecosystem plans to redirect UCO from the food value chain to the biodiesel manufacturing units, recognising that UCO is a potential feedstock for biodiesel and stands as an end to supply chain mechanism.

## **2 Rationale of the study**

The link between re-used cooking oil and the production of trans-fats is well established; as is the link between trans-fats and the incidence of NCDs. What remains poorly understood though is the prevalence of the practice of re-use of cooking oil among commercial food vendors. RUCO offers a take-back mechanism among the bigger food vendors (whose daily consumption of oil exceeds 50 litres), therefore curtailing the practice of re-use of cooking oil among them to an extent. However, there are thousands of small-scale food vendors who also re-use cooking oil on a regular basis. This has been reported in the past, by the press. These vendors, however, do not come under the purview of the RUCO scheme, but their practices continue to be a public health hazard. This survey, therefore, aims to understand how prevalent the practise of re-use of cooking oil is among small-scale street food vendors.

சாலையோர துரித உணவகங்களில் பயன்படுத்தப்படும்

# தரமற்ற எண்ணெய், மசாலாக்களால் பொதுமக்களுக்கு கல்லீரல் பாதிப்பு

டாக்டர்கள் எச்சரிக்கை



சென்னை, ஜன. 10: ஸ்டார் மற்றும் பிரபல ஓட்டல்களில் ஒரு முறை பயன்படுத்தப்படும் சமையல் எண்ணெய்யை வாங்கி, பயன்படுத்தும் சில சாலையோர உணவகங்களால், அந்த உணவை சாப்பிடும் பொது மக்களுக்கு வயிறு மற்றும் கல்லீரல் பாதிப்பு ஏற்படும் ஆபத்து இருப்பதாக மருத்துவர்கள் எச்சரித்துள்ளனர்.

தமிழகத்தின் பல்வேறு மாவட்டங்கள் மற்றும் வெளி மாநிலங்களை சேர்ந்த பல்லாயிரக்கணக்கானோர் கல்வி, வேலைவாய்ப்பு உள்ளிட்ட காரணங்களுக்காக சென்னையில் தங்கியுள்ளனர். இவ்வாறு வாடகை வீட்டில் தங்கியுள்ள பலர், சமைக்க வசதியின்றியும், நேரமின்மை காரணமாகவும் துரித உணவகங்கள் மற்றும் ஓட்டல்களை நம்பி உள்ளனர். இவர்களை குறிவைத்து விதிக்கு விதி ஓட்டல்கள் துரித உணவகங்கள் பெருக்கெடுத்தள்ளன. அதுமட்டுமின்றி, ஒரே நேரத்தில் 5 ஓட்டல்கள், 10க்கும் மேற்பட்ட துரித உணவகங்களையும் காண முடிகிறது.

இந்த துரித உணவகங்களில் தொடர்ந்து உணவுகளை வாங்கி சாப்பிடும் பொதுமக்கள், அடுத்த சில ஆண்டுகளில் அதன் பக்கவிளைவுகளை அனுபவிக்க தொடங்குகின்றனர். பொதுவாக உணவகங்களில் ஒருமுறை பயன்படுத்தப்படும் எண்ணெயை மறுமுறை பயன்படுத்தக் கூடாது என்ற விதி உள்ளது. ஆனால், பெரும்பாலான கடைகளில் அதை மீறி ஒருமுறை பயன்படுத்திய எண்ணெயை, பலமுறை பயன்படுத்தப்படுவதால், வயிறு உபாதைகளுக்கு பொதுமக்கள் பெரிதும் பாதிக்கப்பட்டு வருகின்றனர்.

பெரியவர்கள் மட்டுமின்றி சிறியவர்கள் உட்பட அனைவரும்



இந்த துரித உணவுகளுக்கு அடிமையாகி விட்டதால், அவர்களின் கல்லீரல் வெகுவாக பாதிக்கப்படுகிறது. தற்போது சென்னையில் பெண்கள் உட்பட குழந்தைகளுக்கு கூட கல்லீரல் பிரச்சனை ஏற்பட்டு வருவது பெரிதும் கவலை அடைய வைத்துள்ளது. இதற்கு காரணம் துரித உணவகங்களில் பயன்படுத்தப்படும் எண்ணெய் மற்றும் மசாலா கலந்த உணவுகள் என மருத்துவர்கள் எச்சரிக்கை விடுகின்றனர்.

உடனடி பாதிப்பு இல்லாததால், பலர் இதை பெரிதுபடுத்துவதில்லை. நமது உடல் மிகவும் சோசமாகி மருத்துவமனையில் சேரும்போது தான் இது குறித்து பொதுமக்கள் நினைக்க தொடங்குகின்றனர். அதற்கு முன்பு வரை இவர்கள் உடலில் உள்ள உறுப்புகளை பற்றி சிந்திப்பதே கிடையாது. முக்கியமாக மது, சிகரெட் போன்ற பொருட்களால் தான் உடல்நலம் கெட்டுப் போகிறது என பொதுமக்கள் நினைத்துக் கொண்டு உள்ளனர். அதற்கு இணையாக தரமற்ற எண்ணெய், மசாலா போன்ற பொருட்களும் தற்போது

கடும் தண்டனை அவசியம்

சென்னையில் ஸ்டார் ஓட்டல்களில் ஒருமுறை பயன்படுத்தப்படும் எண்ணெயை சில புரோக்கர்கள் வாங்கி, சாலையோர துரித உணவகங்களில் குறைந்த விலைக்கு விற்கின்றனர். அதை துரித உணவகங்கள் பலமுறை தொடர்ந்து பயன்படுத்துவதால், இதில் தயாரித்த உணவுகளை சாப்பிடும் பொதுமக்களுக்கு கெடுதல் ஏற்படுகிறது. எனவே, இதையோன்று செயல்படும் துரித உணவகங்களுக்கு அபராதம் விதிப்பதை நவீகப்படுத்தி, கடுமையான தண்டனைகளை விதிக்க அதிகாரிகள் நுவலுக்க வேண்டும்.

அதிகாரிகள் பற்றாக்குறை

சென்னை மாவட்ட உணவு பாதுகாப்பு துறையில் போதிய அதிகாரிகள் மற்றும் ஊழியர்கள் இல்லாததால், சென்னையில் உள்ள அனைத்து உணவகங்கள் மற்றும் துரித உணவுகளை கண்காணிப்பது சவாலான காரியம். எனவே வருங்கால சந்ததியினரை மனதில் வைத்து சென்னையிலுள்ள துரித உணவுகளுக்கு கடினமான போடும் வகையில், உணவு பாதுகாப்பு துறையில் போதிய அதிகாரிகள் மற்றும் ஊழியர்களை நியமிக்க வேண்டும், என சமூக ஆர்வலர்கள் கோரிக்கை விடுகின்றனர்.

தடை விதிக்கப்படுமா?

சென்னையில் பெரும்பாலான துரித உணவகங்கள் சாலை நடைபாதைகளில் இயங்கி வருகின்றன. இதனை மாநகராட்சி அதிகாரிகளும் கண்டுகொள்வதில்லை. இதனால் நடைபாதைகளை பொதுமக்கள் பயன்படுத்த முடியாத நிலை ஏற்படுகிறது. மேலும் நடைபாதைகளில் மசாலா பொருட்களை கொண்டு சமையல் செய்வதால் பொதுமக்களுக்கு கண் எரிச்சல் மற்றும் கவச கோளாறு உள்ளிட்ட பிரச்சனைகளும் ஏற்படுகின்றன. இதனை தடுக்க நடைபாதைகளில் துரித உணவகங்கள் செயல்பட தடை விதிக்க வேண்டும்.

பொதுமக்களின் உயிரை குடிப்பதாக மருத்துவர்கள் தெரிவிக்கின்றனர்.

இது குறித்து பெரம்புளூர் சேர்ந்த வயிறு மற்றும் குடல் அறுவை சிகிச்சை நிபுணர் டாக்டர் வெங்கடேஷ் கூறுகையில், "கடந்த 10 வருடங்களில் குழந்தைகளுக்கு அருந்துபவர்கள் மட்டுமே கல்லீரல் பிரச்சனை சம்பந்தமாக மருத்துவமனைக்கு வந்தனர். ஆனால் தற்போது பெண்கள், குழந்தைகள் என பலரும் இந்த பிரச்சனையால் மருத்துவமனைக்கு வர ஆரம்பித்துள்ளனர்."

கல்லீரல் பிரச்சனைகள் 6 வகையாக பிரிக்கப்படுகிறது. இதில் 5வது நிலை கல்லீரல் பழுதடைந்து அதை மாற்ற வேண்டிய சூழ்நிலை ஏற்படும். அடுத்த நிலை கல்லீரல் புற்றுநோய் ஏற்படும் அபாயம் உள்ளது. ஒரு காலத்தில் மது அருந்துவதால் மட்டுமே வந்த இப்பிரச்சனை, தற்போது தரமற்ற எண்ணெய் மற்றும் மசாலா பொருட்களால் சமைக்கப்பட்ட உணவை சாப்பிடும் மக்களுக்கும் வர தொடங்கி உள்ளது. குறிப்பாக துரித உணவகங்களில் ஒருமுறை

பயன்படுத்திய எண்ணெயை மீண்டும் மீண்டும் பயன்படுத்துவதால் கல்லீரல் அருகே கொழுப்பு அதிகமாக படர்கிறது. சராசரியாக ஒரு மனிதனுக்கு 10% முதல் 20% வரை கொழுப்புகள் இருக்கும். ஆனால் தற்போது லிவர் பரிசோதனை செய்தால் 50 சதவீதத்துக்கு மேல் கல்லீரல் பகுதியில் கொழுப்பு படர்ந்து இருப்பது தெரியவந்துள்ளது.

இதனால் கல்லீரல் பாதிக்கப்படும் போது அதனுடன் சேர்ந்து இணை நோய்களும் பொதுமக்களை தாக்குகின்றன. சென்னையில் மட்டும் தற்போது 15 ஆயிரத்துக்கும் மேற்பட்ட பொதுமக்கள் கல்லீரல் மாற்று சிகிச்சைக்காக காத்திருக்கின்றனர். குறைந்தபட்சம் தனியார் மருத்துவமனைகளில் ₹50 லட்சம் வரை இதற்காக செலவிட வேண்டிய உள்ளது. இதற்கு முழு காரணம் தரமற்ற எண்ணெய் மற்றும் மசாலா வகைகள் என்பதை பொதுமக்கள் உணர்ந்து, தரமான உணவுகளை சாப்பிட வேண்டும், என்றார்.



## 3 Study Methodology

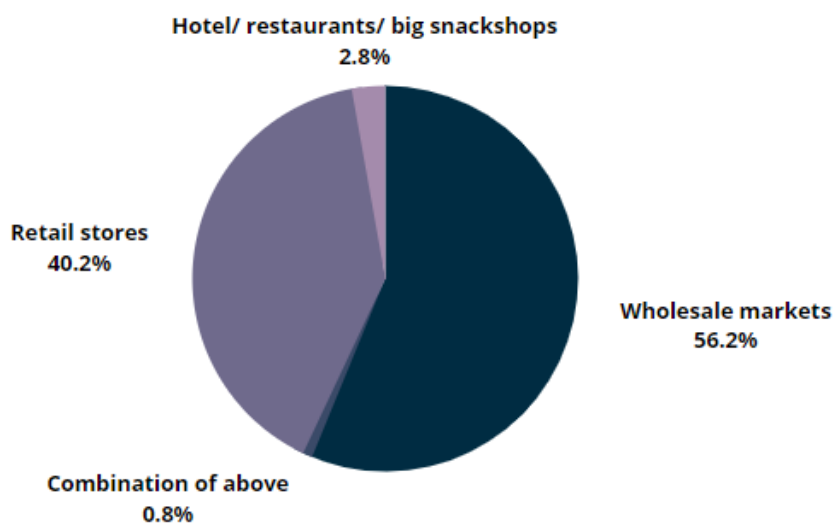
### 3.1 Data collection

Survey questionnaires were developed and administered, targeting the street vendors of Tamil Nadu in the districts of Nagapattinam, Madurai, Virudhunagar, Nilgiris, Erode, Thiruvanamalai, Karur, Dharmapuri, Dindigul, Cuddalore, Thiruvarur, Namakkal and Mayiladudurai. A random sampling technique, with open and close-ended questions was followed and a total number of 2333 samples were studied.

## 4 Findings from the study

### 4.1 Place of purchase of cooking oil

Almost 56.2% of vendors purchase cooking oil from wholesale markets, closely followed by 40.2% in retail stores. Few vendors (around 4%) buy used oil from hotels, restaurants and big snack shops.



*Fig 1: Place of purchase of cooking oil*

### 4.2 Kind of oil/s used for cooking purposes

Palm oil usage ranks highest with 76.2% and is considered a commonly used oil for cooking purposes by the respondents of the survey. Apart from this, 12.5% of respondents use groundnut oil, followed by gingelly oil. Vanaspathi and other oils like sunflower, rice bran, sesame, etc are used among 9.6% of the respondents.

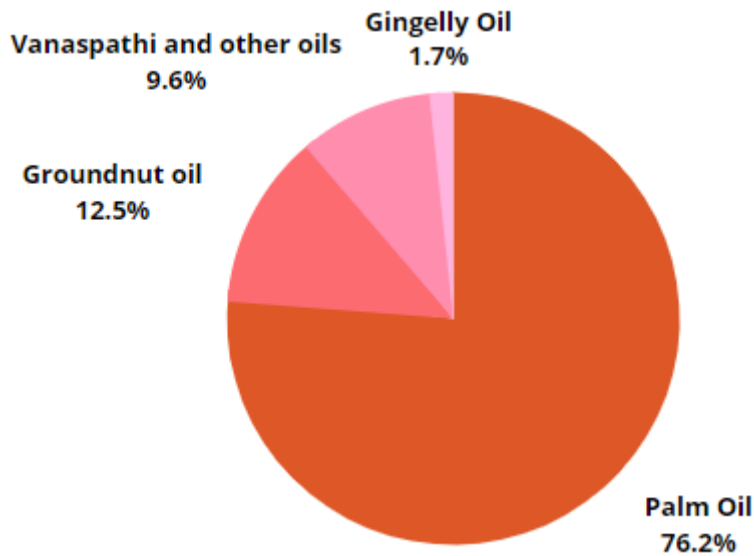


Fig 2: Kind of oil/s used for cooking purposes

### 4.3 Reason for using a particular oil type

Cost factor turned out to be an important aspect in choosing a particular oil type. About 39.6% of the respondents bought their respective oils because they were cheaper. Around 36.6% felt the taste of food was better using that oil and 16.3% chose the oil for its quality.

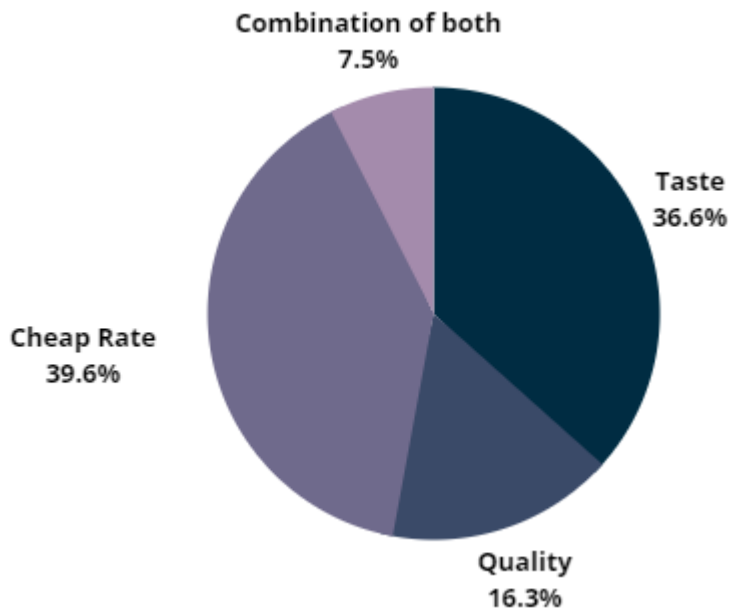


Fig 3: Reason for using a particular oil type

## 4.4 Cost per litre of oil

The price of the oil differed based on the type and brand. 71% of the respondents said that their oil costs between Rs.100 and Rs.150/-per litre; 24% said that their oil costs between Rs.80 and Rs.100/-per litre; and around 5% said that they pay around Rs.250 per litre.

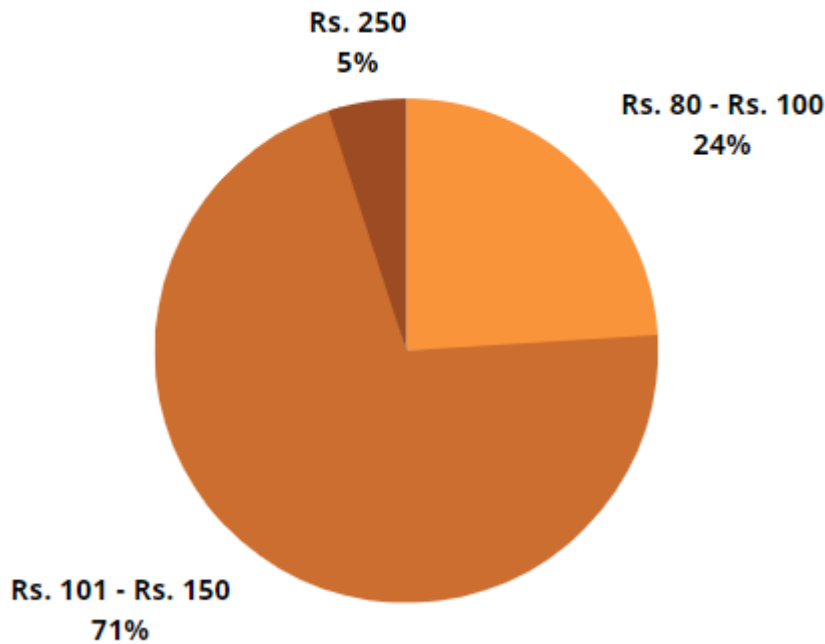
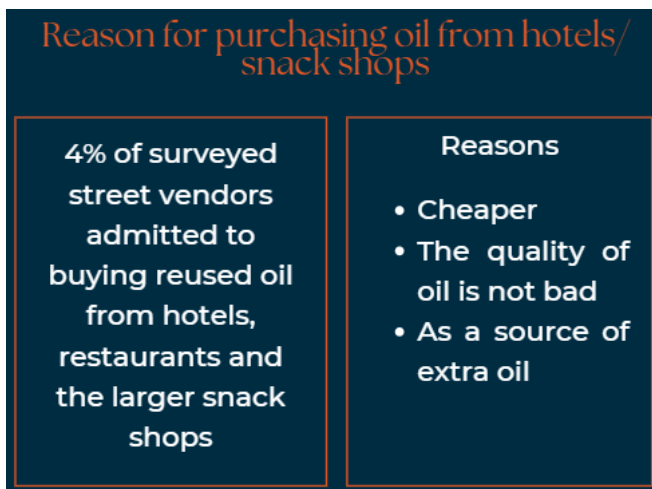


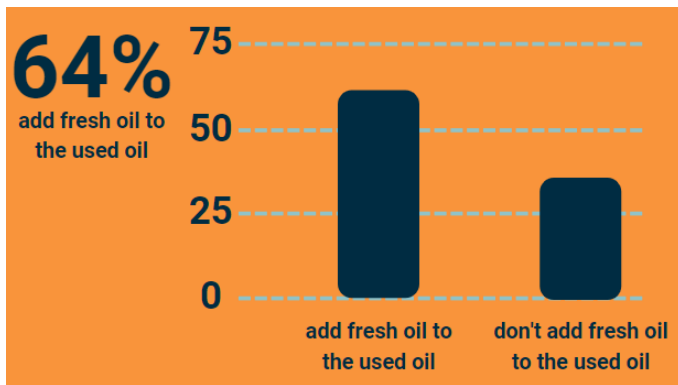
Fig 4: Cost per litre of oil

## 4.5 Reason for purchasing oil from hotels/snack shops



Only a limited number of surveyed street vendors (about 4%) admitted to buying reused oil from hotels, restaurants and the larger snack shops. They said that it was mainly because of low prices; some claimed that the quality of the oil is not bad and others purchased it as a source of extra oil.

## 4.6 Topping up with fresh oil



64% of the respondents said that they add fresh oil to the used oil.

Among the respondents who add fresh oil to the used oil, 30% of them said that they added it only once; 27 % of them added fresh oil to the used oil twice; 22% of

them added it three times. Around 9% of the respondents reuse the same oil throughout the day.

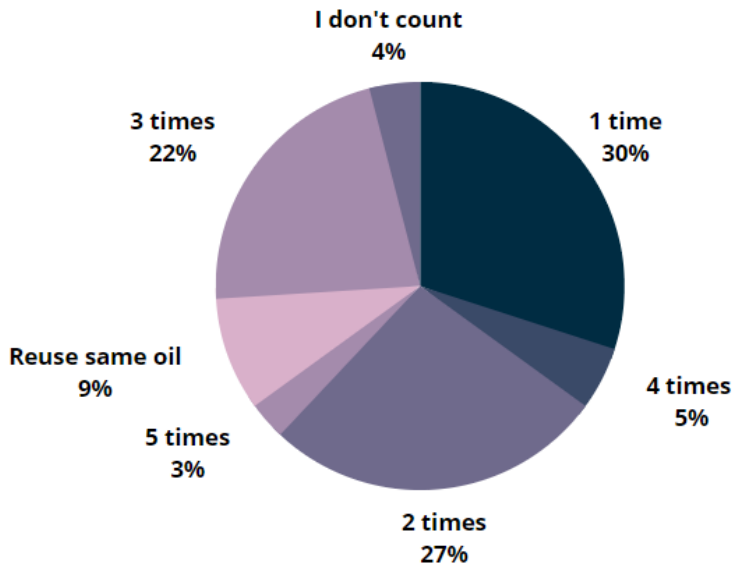


Fig 5: Topping up with fresh oil

## 4.7 Disposing off used cooking oil

The majority of street vendors 54.7% dispose of (throw away) used oil, while others find alternate uses for the oil like such as using it for other cooking purposes at home - 24.2%. 2.5% report that there won't be any used oil left.



## 4.8 Methods of disposal

Most vendors dispose off used oil into the environment, while only about 5% avail of the services of RUCO. Throwing away used oil is detrimental to the environment. Apart from the aforementioned disposal methods, some other, although not widely practised methods, include selling the used oil to others and even as a lubricant for machinery.

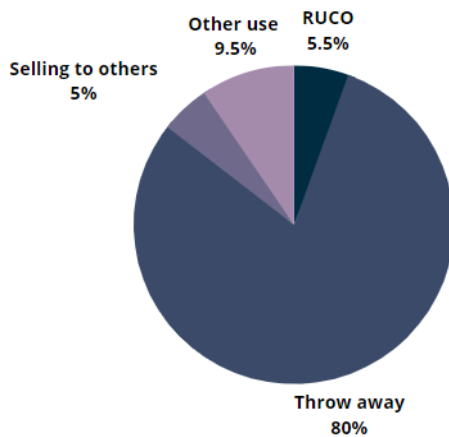


Fig 6: Methods of disposal

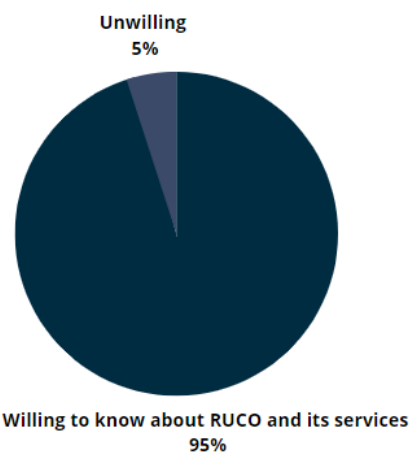
## 4.9 Frequency of oil procurement

While a majority of the shops reuse procured oil once or twice, it must be noted that 60% of the vendors procure oil 3-4 times per week while the others change the oil once in 2 days.

**60% of vendors procure oil 3 - 4 times a week**

40% of the vendors change the oil once in two days

## 4.10 RUCO



Very few of the respondents (10.5%) have heard about RUCO and the services it offers. Most of them (around 89.5%) are not aware of RUCO. 95% of the respondents are ready to know and use the services provided under the RUCO scheme.

Fig 7: RUCO

## **5 Opinions from officials and industries**

Designated Officer of Tamil Nadu Food Safety Department, Mr. Ramakrishnan said that the Tamil Nadu government has been working to enforce the RUCO program, especially over the last few years. The last year has particularly seen efforts to build mandatory monitoring and compliance with the program. Monthly, as well as quarterly reports of hoteliers and restaurant owners (consumers of 50 L and more oil per day) who deposit their used cooking oil to the RUCO collecting agencies are also being recorded with these records reviewed monthly. The officer added that the RUCO program is run as the Food Safety department's priority program and it is already effective in 32 districts of Tamil Nadu. Another official, who preferred anonymity, said that upon a recent analysis, the requirement for used cooking oil in industries that manufacture soap and detergent is very minimal, and therefore not all used cooking oil makes it there. As a result, large quantities of used cooking oil are either repeatedly reused by hotels, restaurants and small-scale local vendors and/or disposed of in the natural environment because the amount of used oil received by the RUCO collecting agencies continues to be less, he said. Food Safety Officer, Mr. Vijayarajan, said that RUCO compliance among FBOs who consume 50 litres of cooking oil per day is effective, while a few other FBOs who consume 30 litres of cooking oil per day voluntarily deposit the UCO in collecting agencies nearby.

An established oil manufacturer from Chennai opined that it is an age-old practice for street vendors to buy used cooking oil from big hotels/savouries/sweet shops and use it to produce things in their own shops. He also explained that they might not readily admit to doing this.

## **6 Inferences from the study**

The following are the key observations from the study:

- Awareness of the harmful effects of consuming food prepared from reused cooking oil can be inferred to be low (from the large proportions of vendors who admitted to re-using cooking oil.) We need more awareness building exercises both among the vendors and the consumer, highlighting the risks of trans fats.



- The RUCO initiative of FSSAI mandates only those food business operators, who consume more than 50 litres of oil in a day, to maintain records and dispose of the used oil to authorised collection agencies. This leaves behind a large number of other food business operators who consume less than 50 litres per day. Hence, rules should be in place for all food business operators irrespective of their consumption capacity.
- In order to facilitate this, there is a need to establish more RUCO collection agencies that will enable easy disposal.
- While the report shows otherwise, there are several media reports and instances where we hear that the bigger food business operators sell used cooking oil to smaller ones and street vendors. Small food establishments buy these oils because they are inexpensive. Therefore, close monitoring and stringent enforcement by the food authorities are necessary to curtail this practice which causes great harm to human health.

## **7 Appendix**

Please find here the survey form used to gather information:

<https://www.cag.org.in/database/reusing-cooking-oil-survey-street-vendors>



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