



C A G

Citizen consumer and civic Action Group

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Tamil Nadu, India
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05 May 2025

To
Shri Jagat Prakash Nadda,
Honourable Minister for Health and Family Welfare,
Government of India,
Room No. 402-D, Nirman Bhawan,
New Delhi – 110 011.

Subject: Concerns regarding using rPET for food packaging and objection to FSSAI's approval of the same

Dear Sir,

Citizen consumer and civic Action Group (CAG), founded in 1985, is a non-profit and non-political organisation working towards protecting citizens' rights in consumer and environmental issues, and promoting good governance processes, including transparency, accountability and participatory decision making.

CAG has an established reputation for undertaking high-quality, independent, objective action research on urban governance, consumer protection, and environmental protection and, based on that, providing recommendations that inform and improve policy and practice.

I am writing to express my deep concern regarding FSSAI's recent decision to amend "Food Safety and Standards (Packaging) First Amendment Regulations, 2025, modifies clause 4(4)(e) of the 2018 Packaging Regulations". Multiple independent scientific studies have established that plastics recycling, particularly of PET, often fails to remove hazardous chemicals and may even increase the concentration of toxic substances in recycled material. Specifically:

- A review published in [Cambridge Prisms: Plastics](#) ("Addressing the toxic chemicals problem in plastics recycling," 2024) shows that recycling processes do not reliably eliminate persistent toxic chemicals such as endocrine-disrupting chemicals, flame retardants, and heavy metals. Instead, recycling can concentrate these hazardous substances in the recycled plastics.
- The [IPEN 2023 report](#) on recycled plastic pellets collected worldwide found widespread contamination with brominated flame retardants, dioxins, bisphenols, and heavy metals, all chemicals linked to cancer, neurological harm, hormone disruption, and reproductive issues.

These findings are deeply alarming because recycled PET intended for direct food contact poses a credible, scientifically supported risk of leaching dangerous substances into food and beverages. This risk is especially unacceptable in India, where recycling supply chains are highly fragmented and contamination controls remain weak. Given these serious, evidence-based health hazards, I humbly request your support and leadership in:

1. Instructing FSSAI to immediately reconsider and suspend the approval of rPET for food packaging.
2. Holding public consultations and involving public health experts, environmental scientists, and consumer groups before implementing any changes that affect food safety standards.

Consumer safety must take precedence over industrial recycling goals, especially when credible, peer-reviewed scientific evidence points to **potential irreversible harm**.

Trustees

Mr. Sriram Panchu (*Senior Advocate*)
Dr. Arjun Rajagopalan (*Surgeon*)
Dr. R. Hema (*Associate Professor*)

Dr. Suchitra Ramkumar (*Doctor and Teacher*)
Dr. George Thomas (*Orthopaedic Surgeon*)
Dr. C. Rammanohar Reddy (*Economist and Editor*)
Mr. Keshav Desiraju (*IAS, ret'd.*)

Advisors

Ms. Tara Murali (*Architect*)
Mr. N.L. Rajah (*Senior Advocate*)



Your intervention at this stage can help prevent long-term public health harm and reinforce trust in India's food safety governance.

I would be grateful if this matter is given the urgent attention it deserves.

Thank you.

Sincerely,

S. Saroja,
Executive Director



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05 May 2025

To

Ms. Punya Salila Srivastava, I.A.S.,
Chairperson,
Food Safety and Standards Authority of India (FSSAI),
FDA Bhawan, Kotla Road,
New Delhi – 110 002.

Mr. G. Kamala Vardhana Rao, I.A.S.,
CEO,
Food Safety and Standards Authority of India (FSSAI),
FDA Bhawan, Kotla Road,
New Delhi – 110 002.

Subject: Concerns regarding using rPET for food packaging and objection to FSSAI's approval of the same

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2. Hold public consultations and involve public health experts, environmental scientists, and consumer groups before implementing any changes that affect food safety standards.

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Consumer safety must take precedence over industrial recycling goals, especially when credible, peer-reviewed scientific evidence point to **potential irreversible harm**.

I trust FSSAI will take these concerns seriously and act prudently to protect public health.

Thank you.

Sincerely,

S. Saroja,
Executive Director