

ALL ODISHA RICE MILLERS ASSOCIATION

S-3/36 , Sec-A, Zone-B, Mancheswar Indl. Estate, Bhubaneswar-751010

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BY EMAIL

Dt-27.08.2018

To,
The Chief Executive Officer,
Food & Safety and Standards Authority of India,
FDA Bhawan, Kotla Road,
New Delhi – 110002.

Sub:- Objection & Suggestions related to Food Products and Food Additives Amendment Regulations, 2018.

Sl No	Name of Organisation, Address & Contact Details	Relevant Section in the draft notification on which comments / suggestions are being provided	Comments / Suggestions	Justification
(i)	All Odisha Rice Miller's Association. Santosh Agarwal, General Secretary, All Odisha Rice Millers Association. Mob-9437028933	(b) In regulation 2.4 (i) In Sub-regulation 2.4.6 24 Rice 24.2.(i) Moisture by mass Not more than 12% in milled Rice & 13% in Milled Parboiled Rice.	Original Limit of 15% should be retained both for Milled Rice & Milled Parboiled Rice.	About 45 to 50 Lakh MT Paddy is procured in Odisha by State Govt & it's agencies as per specifications determined by GOI wherein the moisture of Paddy is allowed @ 17%. The same paddy is being handed over to Rice Mills of the State for Job Work where they Mill the paddy and deliver the resultant rice to State Govt / FCI with a moisture of 14% & with a value cut upto 15%. Millers have to deliver CMR @ 68 % OTR with 14% moisture when they are delivered with paddy @ 17% Moisture. But Milling Rice @ 13% is simply impractical as it will further reduce the OTR by 1% & increased the broken levels.

contd... Pg 2 .

		<p>24.2 (ii)(b) inorganic extraneous matter (% by mass)</p> <p>0.1% in Milled Rice/Milled Parboiled Rice.</p>	<p>Original Limit of 0.25% with respect to inorganic extraneous matter (% by mass)</p>	<p>Before coming into a conclusion the authorities in FSSAI should adopt a field test & take a judicious decision thereafter to safe guard the interest of the farmers & the agro based industry.</p> <p>The inorganic extraneous matter is more in paddy harvested through combine harvester. Therefore, 0.1% limit is not justified and rather it should stay as old limit @ 0.25%.</p>
(iii)		<p>24.2 (vi) & (vii) Damaged Kernels (%m/m) and pin point damaged kernels (%m/m)</p> <p>Damaged Kernels-3% in milled rice/milled Parboiled Rice</p> <p>Pin point Damaged Kernels-2 % in milled rice/milled parboiled rice.</p>	<p>Damaged Kernels- 5 % in milled rice/parboiled milled rice</p> <p>Pin Point Damaged Kernels-5 % in milled rice/milled parboiled rice is suggested.</p>	<p>The earlier limit of separate damaged grain in FSSAI (PFA) standards i.e. 5 % should be retained. In addition to this, separate limit of pin point point damaged kernels to the tune of 5% in milled rice/milled parboiled rice are suggested. Since pin point damage is a result of climatic condition, hence it must be kept at 5%.</p>

Thanking You,
Yours faithfully,
For All Odisha Rice Millers Association


(Santosh Agarwal)
General Secretary.