



**FOOD SAFETY AND STANDARDS AUTHORITY OF INDIA (FSSAI) NEW  
REQUIREMENTS FOR ANIMAL FEED, FOOD SAFETY AND  
STANDARDS ACT 2006 (DATED 27 JANUARY 2020) –  
SPECIFIC TRADE CONCERN 479**

SUBMISSION BY THE UNITED STATES

The following submission, received on 30 March 2021, is being circulated at the request of the Delegation of the United States.

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1.1. The United States remains concerned with India's new directive on animal feed, issued on 27 January 2020. We anticipate that the directive will have a significant impact on trade in feed ingredients, and possibly on meat and dairy products from livestock fed in other countries and imported by India.

1.2. The directive contains two parts. Part one of the directive makes mandatory the formerly voluntary guidance for animal feed, to implement the Bureau of Indian Standards (BIS) specifications for Compounded Feeds for Cattle. Part one has not been notified to the WTO SPS Committee and, to date, WTO Members have not had an opportunity to comment on this regulation.

1.3. As we noted during the June and November 2020 SPS Committee meetings, according to the directive, India only allows import of those feed types listed in the directive, and this list omits several feed ingredients commonly used around the world, such as distillers' dried grains with solubles (DDGS), alfalfa, timothy hay, and several types of vitamin and mineral feed supplements.

1.4. India noted in the November SPS Committee meeting that it was willing to work with the United States to clarify the process by which feed ingredients may be added to the official list, and we thank the Government of India for this offer of cooperation.

1.5. While we have received an informal response from India regarding this list, we wish to reiterate that guidance on this issue must be in writing and outline predictable, non-discriminatory, and scientifically sound methodology for adding new feed ingredients. Thus far we have received no such guidance. We also request for India to submit a notification on part one to the SPS Committee.

1.6. Part two of the directive was notified to the SPS Committee as [G/SPS/N/IND/249](#) on 26 February 2020. Part two of the directive includes language that amends requirements for meat and meat products as detailed in the 2011 FSSAI Food Product Standards and Food Additives regulations.

1.7. This text appears to link feed and the acceptability of meat and meat products from cattle fed with certain types of feed. It is our understanding that meat-producing animals must be fed only the 49 feed ingredients approved in the BIS standard. We ask that India please confirm this understanding, and provide the scientific basis for such a requirement.

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