



Wheat Products Promotion Society

(A BODY SUPPORTED BY NATIONAL TRADE AND TECHNICAL ORGANISATIONS OF WHEAT FOOD INDUSTRIES)
(REGISTERED UNDER THE SOCIETIES REGISTRATION ACT XXI OF 1860)

Industry Representation - Wheat and Wheat Products

Ref.: WPPS/FSSAI/2026/17

Date: 21 August 2026

To,

Ms. Punya Salila Srivastava, IAS

Chairperson, Food Safety and Standards Authority of India (FSSAI)

03rd & 04th Floor, FDA Bhawan, Kotla Road near Bal Bhawan, New Delhi - 110002

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And

Shri Rajit Punhani, IAS

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Subject: Request for a risk-based, supply-chain-aligned compliance and enforcement framework for pesticide residues, mycotoxins and infestation in wheat and wheat flour

Respected Madam/Sir,

The Wheat Products Promotion Society (WPPS) respectfully submits this representation to support stronger food-safety outcomes through a practical, science-based and auditable framework for wheat and wheat flour. WPPS is not seeking dilution of any health-based standard. Our request is that sampling, testing, traceability, due diligence and enforcement recognise how agricultural wheat is actually produced, aggregated, stored and processed in India, while maintaining full consumer protection.

1. Why wheat requires a supply-chain-aligned approach

India's grain supply originates from a highly fragmented farm base. Government agricultural statistics for 2015-16 record an average operational holding of 1.08 hectares. By the time wheat reaches a flour mill, a commercial lot may have been aggregated from many farms through mandis, traders, warehouses, public procurement or storage systems. Consequently, the identity of every farm sub-lot may no longer be practically separable for laboratory testing.

The principal hazards also arise at different points in the chain. Pesticide residues may result from field use or post-harvest/storage treatment. Mycotoxins are biological hazards influenced by crop stress, moisture, temperature, insects and storage duration. Infestation may develop during storage or transit. A finished-product result establishes the level found in the tested sample; by itself it does not establish the stage at which the condition entered the chain.

2. The Food Safety and Standards Act supports risk-based administration and documented due diligence

Section 18 of the Food Safety and Standards Act, 2006 requires risk management and, while standards are framed, consideration of prevalent Indian agricultural, handling, storage and



transport conditions as well as relevant international standards and practices. Section 26 makes every food business operator responsible for compliance at stages within the business under its control, while Section 27 separately allocates liability among manufacturers, packers, wholesalers, distributors and sellers.

Section 80 provides a statutory defence of due diligence where reasonable precautions and checks have been taken and, in appropriate circumstances, recognises reasonable reliance on information or checks from another person in the supply chain. Sections 46 and 47 provide statutory mechanisms for appeal, split samples, accredited-laboratory analysis and referral-laboratory determination. These provisions support a compliance system that is health-protective, evidence-based, traceable and procedurally fair.

3. Current regulatory position demonstrates the need for clear commodity mapping

FSSAI's current Contaminants, Toxins and Residues Compendium (Version IX, 3 February 2026) prescribes a maximum of 15 µg/kg for Total Aflatoxins and 10 µg/kg for Aflatoxin B1 in cereal and cereal products. Separately, FSSAI licence conditions require each category/type of finished food product to be tested against applicable FSS standards at least once in six months through an NABL-accredited or FSSAI-notified laboratory. This provides an important finished-product compliance baseline, but it is not a commodity-specific sampling plan for every incoming wheat vehicle or every underlying farm lot.

For Chlorpyrifos, the notified regulation text available through FSSAI/India Code lists 0.05 mg/kg for 'Foodgrains' and 0.01 mg/kg for 'Milled foodgrains'. FSSAI's September 2024 draft comprehensive pesticide-MRL revision, however, proposed commodity-specific limits of 0.5 mg/kg for wheat and 0.1 mg/kg for wheat flour. FSSAI's e-comment portal shows that the comment period on that draft has closed, while FSSAI continues to list the comprehensive pesticide-MRL revision as a draft. WPPS therefore requests a single, authoritative and continuously updated commodity-pesticide MRL map that clearly identifies the currently enforceable limit, the source notification, registration status, any applicable tolerance/default rule and effective date.

4. Illustrative industry case - pesticide residue, not aflatoxin

As per a July 2025 Food Analyst report furnished to WPPS by a member mill, a pre-packed fortified wheat flour sample was reported with Chlorpyrifos at 0.024 mg/kg against a maximum of 0.01 mg/kg applied by the laboratory and was consequently reported non-conforming/unsafe. In the same report, Total Aflatoxins were below the reporting/quantification level of 1.0 µg/kg against the applicable maximum of 15 µg/kg, and dead/living insects were reported absent. The case therefore relates to pesticide residue, not an aflatoxin exceedance or infestation finding.

WPPS does not rely on this case to suggest that the laboratory applied an incorrect legal limit. Rather, it illustrates why processors, laboratories and enforcement authorities would benefit from one authoritative current MRL mapping and a clearly documented confirmatory/referral pathway. The underlying analyst report can be furnished to FSSAI confidentially for technical review.



5. International practice supports representative sampling and risk-based monitoring

Codex CXC 51-2003 recognises that complete prevention of pre- and post-harvest toxigenic fungal dissemination is not practically achievable even when GAP and GMP are followed, and therefore stresses diligent monitoring and proper sampling plans. Its aflatoxin annex further notes that aflatoxins rarely occur in small grains except in sorghum and as a result of poor storage practices.

For official mycotoxin controls, Commission Implementing Regulation (EU) 2023/2782 applies defined commercial lots/sublots, incremental samples and aggregate samples, including specific cereal sampling plans based on lot weight. This illustrates a representative-lot architecture rather than treating every underlying farm parcel as a separate laboratory lot.

For infestation/filth terminology, the US FDA wheat-flour enforcement framework separately addresses microscopic insect fragments in representative subsamples. WPPS is not proposing adoption of the US numerical threshold; we request an Indian scientific review of whether measurable terminology should distinguish active/gross infestation from unavoidable microscopic remnants where supported by evidence.

6. WPPS requests

1. Constitute a joint technical working group comprising FSSAI (Science & Standards, Regulatory Compliance and Quality Assurance), DFPD/FCI, Department of Agriculture & Farmers Welfare/CIB&RC, Ministry of Food Processing Industries, FSSAI-notified/NABL-accredited laboratories, grain scientists and WPPS.
2. Issue a wheat-specific, risk-based sampling and testing guideline defining commercial lot/sublot, incremental and aggregate/composite sampling, sample retention, risk tiers, testing frequency and escalation triggers for wheat and wheat flour.
3. Publish an operational due-diligence checklist aligned with Section 80 for grain processors, covering approved suppliers, traceability, storage and moisture control, fumigation/pest-control records, representative testing, corrective and preventive action (CAPA), and reasonable reliance on upstream checks where appropriate.
4. Publish and maintain one consolidated commodity-pesticide MRL map for wheat and wheat flour, with the applicable legal notification, MRL, pesticide registration status, any tolerance/default rule and effective date; and specifically clarify the current enforceable Chlorpyrifos MRL for wheat and wheat flour.
5. Develop a standardised “Wheat Safety Data Passport” / minimum data set through which organised suppliers, warehouses, mandis/FPOs and public agencies can pass source, moisture/storage, fumigation/pest-control and relevant test information downstream.
6. In coordination with DFPD/FCI, clarify contaminant-surveillance, storage and pest-control protocols applicable to publicly procured/stored wheat and consider a standardised safety/quality declaration when such wheat is released downstream.
7. Reinforce timely use of the statutory split-sample, accredited-laboratory and referral-laboratory mechanisms under Sections 46-47 and the Rules, particularly where a result is marginal or disputed, so that enforcement decisions rest on representative and confirmatory evidence.



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8. Adopt a risk-based aflatoxin surveillance framework for wheat: intensified testing where storage/climatic indicators, damaged grain or prior history indicate higher risk, supported by periodic representative composite surveillance for standard-risk supply.
9. Undertake a scientific review of infestation terminology and measurable categories in wheat flour, distinguishing active/gross infestation from microscopic remnants where scientifically justified.
10. Support validated rapid-screening and shared/cluster testing capacity at major procurement centres and mandis, with confirmatory analysis through FSSAI-notified/NABL-accredited laboratories.
11. Undertake a two-season national wheat surveillance pilot covering major producing regions, storage systems and supply channels before considering any numerical revision of pesticide or mycotoxin limits.
12. Consider recognition/development of a WPPS Wheat Safety Due-Diligence Code of Practice aligned with Codex, FSSAI food-safety management requirements and Section 80.

Our central submission

Health-based food-safety standards should remain fully protective. The reform requested is in the control and enforcement architecture: representative sampling, risk-based frequency, clear MRL status, shared upstream information, statutory confirmatory/referral testing and a practical documented due-diligence framework for an inherently aggregated agricultural supply chain.

WPPS would be grateful for an opportunity to make a technical presentation and to participate in a joint working group. We are prepared to compile anonymised member incident data and support a national surveillance pilot so that any future regulatory refinement is based on Indian evidence and measured risk.

We request your kind consideration.

Yours faithfully,

For Wheat Products Promotion Society (WPPS)

Ajay Goyal

Chairman - WPPS

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Copy for kind consideration / coordination:

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3. Secretary, Department of Food & Public Distribution

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4. Chairman & Managing Director, Food Corporation of India

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5. Secretary, Department of Agriculture & Farmers Welfare

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6. Secretary, Ministry of Food Processing Industries

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Annexure A - Regulatory & Technical References

1. Food Safety and Standards Act, 2006

Sections 18, 26-27, 46-47 and 80 - risk analysis, responsibility of food business operators, statutory sampling/referral mechanisms and due-diligence defence. (India Code / Government of India)

2. Food Safety and Standards (Contaminants, Toxins and Residues) Regulations, 2011

Current FSSAI Compendium, Version IX dated 03.02.2026, read with the applicable Gazette notifications/amendments - including contaminant and pesticide-residue requirements relevant to cereals and cereal products. (FSSAI)

3. Draft Food Safety and Standards (Contaminants, Toxins and Residues) Amendment Regulations, 2024

Comprehensive proposed revision of pesticide MRLs, published by FSSAI on 23.09.2024, together with the FSSAI e-comment status record. The draft is cited only as a proposal and not as an enforceable standard. (FSSAI)

4. Codex Alimentarius CXC 51-2003

Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals - relevant to prevention, monitoring, storage controls and representative sampling principles. (Codex Alimentarius Commission)

5. Commission Implementing Regulation (EU) 2023/2782

Methods of sampling and analysis for the control of mycotoxins in food - cited as an international comparator for lot/sublot, incremental and aggregate sampling architecture. (European Union)

Regulatory note: FSSAI compendia are used for ready reference; in case of any inconsistency, the original Gazette notifications and amendments prevail. WPPS therefore seeks written clarification of the currently enforceable commodity-pesticide MRL mapping where ambiguity exists.