

1 June 2022

**Shri. Arun Singhal**  
**Chief Executive Director,**  
**Food Safety & Standards Authority of India**  
**Government of India**

**Subject: RAI Appeal to include Category 8 and 9 in FSSAI Licence for retail/trade of pre-packed non-veg products without demanding NOC/license from respective Municipal Corporation.**

**Honorable CEO,**  
**Greetings from RAI!**

Retailers Association of India (RAI) is the unified voice of Indian retailers working with all the stakeholders for creating the right environment for the growth of the modern retail industry in India. RAI is the premier body of Retailers in India, having around 13667 member establishments, including large and small retailers in the country, having approximately 500,000 stores providing Direct and Indirect employment to 50 million Indians.

RAI represents all Supermarkets and Hypermarkets across the country including Spencers, More Retail Private Ltd, Reliance Retail etc. provide food, grocery and other essential services to citizens of country.

Sir, RAI member retailers are also engaged in retailing across the States of Haryana, Uttar Pradesh and Delhi and other States in India. They are **intended to sell** pre-packaged frozen and pre-packaged fresh non-veg products from their respective retail stores. These retailers are **not processing** the non-veg at their respective retail stores but only selling pre-packaged non-veg products, still they are facing great difficulty in getting trade/Retail licence including category no. 8 and 9 products. Moreover, our members have been asked by your respective officials to submit with them No -Objection Certificate/licence from concerned Municipal Corporation.

We, humbly submit that our members do not carry any manufacturing or packaging activity at their respective retail stores but they are procuring the pre-packaged non-veg products from vendors and selling it to customers. Still your respective officials are insisting them to submit No Objection Certificate ("NOC") issued by concerned Municipal Corporations which in our view is not mandatory and it entails lot of time due to cumbersome processes involved. Even in the circular dated 19th March 2021, it has been mentioned that only in case of processing of meat, NOC from Municipal Corporations is required beside source of raw material. Still most of your officials in the state of Haryana, Uttar Pradesh and Delhi are insisting our members to submit NOC from Municipal Corporation.

We would like to submit here that our members are complying with the FSSAI Norms including but not limited to maintaining high standard of hygiene in their respective stores, maintaining desired temperature at the storage facilities etc.



This is also to bring to your kind notice that our members are operating in other states as well but are not facing any such concern of this kind and are also getting the licence with category 8 & 9 without Non-Veg NOC.

In view of above, your good-self is requested to examine the matter and accordingly **give appropriate directions or issue appropriate circular/notification to concerned Commissioners to issue FSSAI licence including category 8 & 9 without demanding NOC/license from respective Municipal Corporation.**

In light of this, we would be grateful if your good offices could issue a clarification in this regard at the earliest.

Warm Regards,  
For and on Behalf of Retailers Association of India,

Gautam Jain, Director – Advocacy, RAI