

# INDIA'S CLEAN STREET FOOD HUBS

WORKING WITH VENDORS TO IMPROVE FOOD SAFETY AND  
STRENGTHEN URBAN FOOD SYSTEMS



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## SUMMARY

Street foods—ready-to-eat foods or beverages that are sold by vendors in the street or other public places—play an important role in contributing to daily nutrition and ensuring food security worldwide. India has a rich tradition of street food vending, much of it taking place in urban areas and accessed by people from all socio-economic backgrounds. In 2018, the Food Safety and Standards Authority of India (FSSAI) piloted the Clean Street Food Hub Initiative (CSFHI), seeking to promote food safety and hygiene at popular street food locations across India. The CSFHI forms clusters of up to 50 street food vendors, connecting them to financial and logistical sponsorship from other private-sector partners, market associations, and civil society organisations. These partners organise ‘pre-audits’ for vendors looking to join the hub, facilitate training, and install infrastructure, helping increase health and hygiene. Post-training audits by FSSAI assess whether the hub qualifies for CSFH certification, based on compliance with basic hygiene and sanitary requirements established by the FSSAI through the CSFH initiative.

This working paper examines the initiative as an example of successfully prioritising (urban) governance for nutrition. It details how the initiative went beyond the usual regulatory role and created opportunities to work jointly with key stakeholders to improve food safety and hygiene. This has led to success: the initiative has thus far certified eight locations throughout the country, led to improvements in food safety and hygiene, and begun to include non-hub vendors in training and certification processes. The involvement of private partners has increased the sustainability of the initiative, and street food festivals have brought increased attention to the supported hubs and street foods in general.

### KEY MESSAGES

- Use of a multi-level approach with clusters of vendors has made it possible for the CSFHI to reach a large number of vendors with multiple services.
- The CSFHI encouraged peer leaders to emerge within clusters; these leaders provided a voice to the vendors and helped mobilise them to act and maintain improved food safety and hygiene standards.
- The CSFHI and the implied certifications for vendors contribute to increased consumer trust in street foods, thereby raising the quality and sustainability of street food vending as a livelihood.
- The CSFHI’s public-private partnership, including with the vendors themselves, has been critical in ensuring the safety of street foods.
- Flexibility and a long-term, inclusive vision were also identified as key aspects supporting the success of the CSFHI.

## BACKGROUND AND OBJECTIVE

It is estimated that around 2.5 billion people around the world eat street food on a daily basis (1). While India has a rich tradition of street food vending, with a vast array of culinary options, the high numbers of street food consumers also reflect a trend towards reduced

time spent cooking meals at home and the convenience and low-cost of these foods. From a social and economic point of view, street foods can help maintain country culinary traditions, attract tourists, and provide an important source of income for the street food vendors (SFVs) (2). From a food security perspective, street foods account for a significant proportion of daily urban and rural food consumption for millions of consumers from diverse socio-economic backgrounds (3).

Street foods can represent a large part of a consumer's daily energy and nutrient intake; for example, a global review found them to provide as much as 50% of the recommended daily allowance for protein (3). If the consumer is informed and able to choose an appropriate combination of foods, street foods can make contributions to obtaining nutritionally balanced meals outside the home (4). However, these foods (many of which are fried or heavily salted or sweetened) can also contribute to high intake of fats, sodium, and sugars (4), which are of concern in the face of growing overweight/obesity and related non-communicable diseases in India (2). Moreover, while some street foods have been found to be high in micronutrients, such as iron and vitamin A, many of them are not (3). Indeed, there is a large range in type and quality of raw materials and processes used to produce street foods, which vary according to the socioeconomic area in which the food is sold (3). It is thus difficult to talk about the nutritional value of street foods in general terms, but it is known that they are important components of diets for many consumers in low- and middle-income countries.

Nonetheless, poor sanitary quality control of street foods can pose a risk to consumers' health in terms of foodborne disease. Diarrhoeal diseases are the most common illnesses resulting from the consumption of contaminated food, causing 550 million people to fall ill and 230,000 deaths every year. Children under 5 years of age carry 40% of this foodborne disease burden, with 125,000 deaths every year (5). Foodborne illness also plays an important role in undernutrition, as unsafe food contributes to a vicious cycle of disease and malnutrition, particularly affecting infants, young children, and other vulnerable groups. This is a serious concern in India, where nearly 40% of children under the age of 5 are stunted (i.e., too short for their age) (6).

Food safety risks related to the consumption of street foods are associated with vendors' poor personal hygiene, prolonged food storage, repeated handling, inadequate re-heating, unclear environments, and the use of substandard water and unclean implements (7, 8). Lack of legal control and hygiene audits of street vending sites make it less likely vendors will follow best practices, increasing the risk for physical, chemical, and microbiological contamination (1). Analyses of street food safety have noted several risks to consumers' health, such as the use of illegal food additives, including colours, and microbiological contamination (7). A 2012 study (9) found *Escherichia coli* (*E. coli*) and *Salmonella typhimurium* (*S. typhi*) in more than 70% of three common types of street foods. A similar study in Bangladesh found a total of 74% of tested ready-to-eat foods from SFVs at a university campus to be contaminated with *E. coli*, with contamination being even higher in foods containing vegetables (91%). Moreover, cross-contamination was also found to be present, with the same organisms detected in samples of fish, meat, and cereals (10). Fortunately, improvements in the food safety practices among SFVs are achievable. Studies in India have documented increases in the average knowledge level and the adoption of



hygiene practices (from 24.4% to 66.2% and from 37.5% to 50.8%, respectively) after providing food hygiene training to 80 SFVs (11).

Against this backdrop, India's Clean Street Food Hub initiative (CSFHI) was developed to upgrade existing Indian streets where street food vending is already present in order to: ensure the health, hygiene, and safety of street foods for all consumers; raise the quality and sustainability of street food vending as a livelihood; ensure social and economic growth of the SFV community by helping them improve the quality of their offerings and attract more customers; enhance the popularity of street food by transforming it into a brand itself (12); and reduce the burden of inspection and regulatory work to a yearly audit upon CSFH recertification (13). The CHSI works by defining Clean Street Food Hubs (CSFHs). A CSFH is a cluster of SFVs in a fixed location that, through sponsorship, undergo a set of trainings and infrastructure upgrades in order to comply with a set of safety and hygiene benchmarks established by the Food Safety and Standards Authority of India (FSSAI).

This working paper provides insight into an example on how multi-level governance is applied and discusses its benefits within the context of (urban) governance for nutrition<sup>1</sup> more broadly, as well as some lessons learned from its application here (14). The paper documents the CSFHI and its pathway to achieving improved food safety, hygiene, and nutrition of street foods. It showcases the important contributions made by the FSSAI and partners, such as the National Association of Street Vendors of India (NASVI). It also examines how the CSFHI is improving food safety practices among SFVs as well as consumer access to safe and nutritious foods; the mechanisms it put in place and their functionality; the challenges and enabling factors encountered in the CSFH implementation; and future considerations for the CSFHI.

## METHODOLOGY

This working paper is based on a qualitative case study of the CSFHI. Data were collected via English-language interviews using Skype, Zoom, and/or WhatsApp. A total of three interviews were carried out with four CSFHI key informants: the FSSAI Leads for Digital Media (Public Relations & Corporate Engagement) and the FSSAI Assistant Director (Tech); the Head of the NASVI; and the Country Director and Project Manager of GAIN India. Interviews took place over the course of three months, between April and June 2019. Respondents were chosen based on advice from the GAIN India Country Director and Project Manager. Interview data were collected using a semi-structured interview tool with variations in questions depending on the role and responsibilities of the person interviewed, and detailed notes were taken during the course of the interview. Email follow-up for clarifications and additional questions were carried out after the initial interview.

As background for the case study, a limited review of the relevant English-language scientific and non-scientific literature (e.g., project reports, presentations, legislation, and websites) on the topic of street food vending, food safety and hygiene and nutrition globally and for India was carried out using databases such as PubMed, PLOS, and ResearchGate. A combination

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<sup>1</sup>GAIN's Urban Governance for Nutrition defines urban governance for nutrition as 'process of making and implementing decisions that shape food systems to deliver better nutrition for people in cities (15)'.

of the following terms was used during searches: 'street food vending', 'street food vendor', 'food safety and hygiene', 'street foods', 'nutrition', 'nutrition governance', 'India', 'Clean Street Food Hubs', 'street food vending hubs', 'governance', 'multisectoral', and 'impact'. Approximately 45 documents were reviewed in-depth. All information collected from interviews and the literature review was collated and inserted into a standardised template capturing information on the initiative, such as background context; triggers for the initiative; aims and objectives; stakeholders involved; local government buy-in; funding; enabling factors; challenges; food environment impact; current state of play and next steps; key messages; and recommendations. This information was further analysed to develop this paper.

## RESULTS

### CONTEXT: INDIA'S STREET FOOD VENDORS

According to data from 2011-2012, the total number of street vendors in India is close to 3.34 million (16). Over 1.6 million of these are in urban areas (16), and an estimated 30% of all street vendors in cities are SFVs (approximately 180,000) (17). Data from NASVI and the Women in Informal Employment: Globalizing and Organizing network indicate that SFVs make up approximately 2-2.5% of the population of major Indian cities (18, 19), with women constituting one-third of these SFVs (20). SFVs may be licensed, making them a legal entity and allowing for them to set up temporary carts in non-intrusive locations. However, their licence does not ensure they have a designated spot from which to sell, and their income and transactions are not tracked. They thus remain part of the informal sector of the economy. Given their informal status, SFVs are often forced to pay bribes and unlawful fees to be able to operate in public spaces (19).

In India, there are two main types of SFVs. The first type is mobile vendors who sell at strategic locations (e.g., near bus stands, metro stations, construction areas, railway stations, colleges, and schools). The second type sell at fixed locations or hubs; clients are often returning customers who know about the street foods available in that specific location (21).

### THE MOTIVATION FOR AND FUNCTION OF THE CSFHI

There is limited knowledge about SFVs and the challenges they face in India. Infrastructure plays an important role in ensuring safe food preparation and personal hygiene, but restricted access to potable water, limited access to toilets, refrigeration, washing, and waste disposal facilities are common for India's SFV (19). Furthermore, many SFVs have poor knowledge of food safety (19). Beyond food safety issues, the right to occupy public space is a delicate issue, since SFVs may be considered a traffic hazard, a parking nuisance, or an obstruction for local businesses (19). In addition, it is difficult to control the large numbers of street food vending operations because of their diversity, mobility, and temporary nature. The fact that SFVs operate as individual enterprises also makes communication of information difficult (17, 19).

Based on the Indian *Street Vendors (Protection of Livelihood and Regulation of Street Vending) Act 2014* (22), which calls for the establishment of central vending zones for SFVs in all Indian cities and guidelines provided by the FSSAI, the CSFHI started in 2018 (13). The CSFHI sought to support SFVs by increasing food safety and hygiene in street food locations across India. Therefore, the CSFHI provides specific clusters of SFVs with a designated space (a hub) from which to operate. Each CSFH can consist of up to 50 SFVs selling popular street foods (80% must be offering local and regional cuisine) (23).

In addition to providing the location, the CSFHI connects the hubs with private partners, market associations, and civil society organisations. These partners organise 'pre-audits' for SFVs willing to join the hub, and provide financial and logistical sponsorship facilitating access to water and sanitation infrastructure and to training, helping increase health and hygiene. In a last step, post-training audits by FSSAI assess whether the hub qualifies for CSFH certification, based on compliance with basic hygiene and sanitary requirements established by the FSSAI through the CSFHI (23).

The initiative is voluntary for SFVs to join. While it is expected that designation of a fixed location will help address potentially problematic occupation of public spaces by SFVs, it should be noted that not all vendors may be willing to enter into a hub arrangement. These vendors may remain mobile. Long-term, the FSSAI aspires to ensure that all SFVs (hub and non-hub) are equipped to provide safe and hygienic food, regardless of location (13).

### **CSFHI – A MULTI-LEVEL APPROACH**

The CSFH establishment and renewal process follows a multi-level approach that receives input from the national, state, and city levels and involves several stakeholders (Figure 1). While the mandate for CSFHs originates at the national level, state and city governments play a prominent role in setting up hubs.

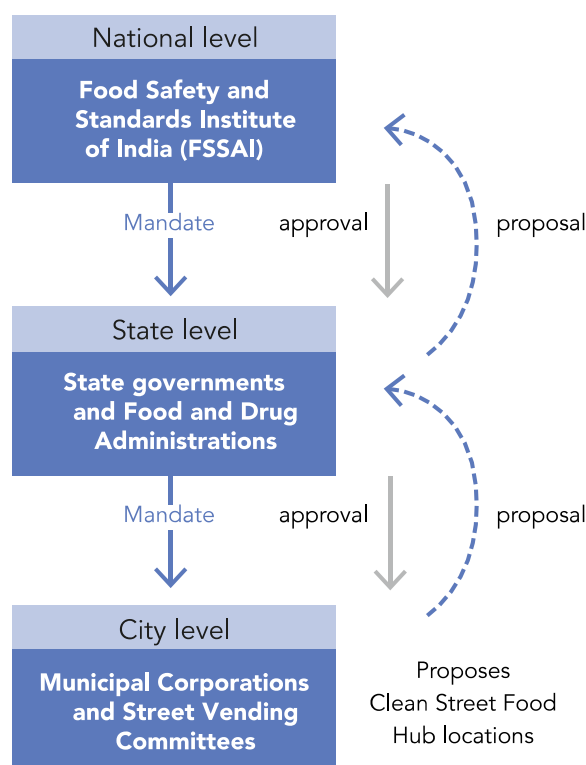


Figure 1. The multi-level approach of the Clean Street Food Hub Initiative (CSFHI). Own illustration

The FSSAI, which created the guidelines for CSFH development, still plays an active role in establishing hubs but has handed over the mandate for day-to-day oversight of the hubs to the state governments (23). The state governments encourage cities (Municipal Corporations and Town Vending Committees) to propose CSFH locations, which are then assessed by the state government and national-level FSSAI. Throughout the process, the national and state governments remain in close contact; FSSAI stays in touch with the state Food and Drug Administration departments, which delegate responsibility for the CSFH to key state personnel. These personnel work with the city and state governments to propose a hub location, while reporting to FSSAI on the progress. City-level Municipal Corporations are part of the town vending committees, which regulate street vendors and are also involved in CSFHs (13, 21).

State governments' support stems from their understanding that the establishment of CSFHs will raise the level of compliance with food safety regulation in the state. As of 13 May 2019, there were 144 recommendations from across the country for locations that could be converted to CSFHs. However, not all states have recommended a potential hub location (13).

Overall, the establishment of an initiative like the CSFH is greatly facilitated by having an existing legislative and institutional framework related to street food vending (see Annex 1 for further details).



## THE PROCESS OF BECOMING A CLEAN STREET FOOD HUB

When setting up a CSFH, the FSSAI recommends looking for already existing physical groupings of SFVs that could be regulated at a single location. If independent vendors exist at that site, they can be encouraged to join the new SFV cluster. This is thought to be more efficient than going to each vendor individually and to allow for better regulation (13). A designated cluster of the SFVs can be upgraded to a food hub once they meet food safety and hygiene requirements.

FSSAI Guidelines for Declaration as a Clean Street Food Hub provide the main benchmarks for a CSFH. The key steps in the process are as follows:

1. The promoter/implementation partner (e.g., state/municipal authority, Panchayat (village council), civil society organisation, or SFV peer leader) submits a CSFH application to the FSSAI online portal (23, 24).
2. FSSAI and the State Food Safety Commissioner carry out an inspection to understand if there is a case for designating the area a potential CSFH. This step is a pre-requisite for CSFH registration. If approval is granted, the process continues (23, 24).
3. The promoter/implementation partner conducts a gap study using FSSAI guidelines and develops an action plan to fill identified gaps (23, 24).
4. The promoter/implementation partner has 6 months to remedy the identified gaps.
5. A formal application for consideration as a CSFH is submitted through the FSSAI portal. Within these 6 months, the following must place:
  - 5.1. Pre-audit of the location, aiming to identify areas requiring improvement so that training can be designed accordingly. A report is prepared shared with the concerned state government, and an FSSAI-approved training partner designs a training course for the potential hub, based on the identified gaps. At the same time, the state government works on addressing identified infrastructural gaps (13, 23, 24).
  - 5.2. Training of SFVs is done by nationwide training partners using an FSSAI-developed curriculum. One half-day training session can reach 50 vendors (13).
  - 5.3. Post-training audit and awarding of CSFH status to cluster. After training and remediation, each SFV in the hub undergoes a post-training audit by the FSSAI to identify compliance with basic hygiene and sanitary requirements based on a scored checklist (23, 24).
6. If the hub achieves a score of 80% or higher on the post-training test, it is certified as a CSFH, valid for a one-year period. If the hub does not pass, it has a chance to attend a refresher training and undergo another post-training audit (13).
7. The CSFH certification is renewed upon passing an annual inspection. If this inspection is not passed, refresher training is offered, and a post-training audit is conducted to see if the hub achieves an 80% or higher score (23, 24).

SFVs in the CSFH are assigned a location and receive a registration number and a Food Safety Display board (FSDB), which they are required to display on their cart or kiosk (Figure 2).


(Please Mention Your License no.)
Street Food

## I Serve Safe Food

### I Follow These 12 Golden Rules

Hygiene Rule Codes		Hygiene Rule Codes	
1	Keep vending premises/cart clean and pest free 		7
2	Use potable water for food preparation 		8
3	Cook food thoroughly. Keep hot food hot and cold food cold 		9
4	Handle and store veg & non veg, raw & cooked food separately 		10
5	Store cold food at cool temperature 		11
6	Use separate chopping boards, knives, etc. for raw/cooked & veg/non veg food 		12

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Figure 2. Food Safety Display Board, Reproduced from (24).

Each qualified vendor is also provided with a Food Safety and Hygiene Kit, including aprons, a cap, disposable plastic gloves, and soap. Box 1 provides further details for the requirements of a Clean Street Food Hub.

### CSFHI - STAKEHOLDERS & FUNDING

Several stakeholders are critical to the CSFHI. The main driver of the CSFHI at the national level is the FSSAI. By establishing this initiative, the FSSAI went beyond their normal regulatory function and put in place a multi-level approach to improve food safety and hygiene and support better working conditions for SFVs. As FSSAI does not have the power to put in place all the elements required to set up CSFHs, they rely on partners (Table 1). These partners from both state and city levels collaborate to ensure each element of the initiative is in place. Some stakeholders, such as corporations, provide funding for CSFHI training when they 'adopt' a hub. Funds go towards covering the cost of training and auditing. The FSSAI is not involved in any of the financial aspects of the CSFHI.

Table 1. CSFH initiative stakeholders

Type	Stakeholder	Role
National	FSSAI	<ul style="list-style-type: none"> <li>responsible for protecting and promoting public health through regulation and supervision of food safety</li> <li>main driver of the CSFHI at the national level</li> <li>created guidelines for the establishment of CSFHs</li> </ul>
National	Ministry of Tourism & Culture	<ul style="list-style-type: none"> <li>promotes Indian food, culture, and tourism</li> </ul>
State	State governments	<ul style="list-style-type: none"> <li>intermediary between the national level (FSSAI) and cities (Municipal Corporations)</li> <li>recommend possible CSFH locations</li> </ul>
State	Food and Drug Administrations	<ul style="list-style-type: none"> <li>state-level arms of the FSSAI; support the implementation of the CSFHI in their states</li> </ul>
City	Housing and Urban Development Department	<ul style="list-style-type: none"> <li>ensures systemised and planned growth of urban areas</li> <li>ensures provision of adequate infrastructure, amenities, and services to citizens</li> </ul>
City	Municipal Corporations	<ul style="list-style-type: none"> <li>responsible for guaranteeing infrastructure, sanitation, and waste disposal</li> <li>propose possible CSFH locations to state governments</li> </ul>
City & non-gov.	Town vending committees	<ul style="list-style-type: none"> <li>involved in making proposals to state for CSFH locations</li> <li>oversee all matters related to street vendors (e.g., certificate issuance, setting vending zones)</li> <li>represent the local authority, the planning authority, traffic police, associations of street vendors, market associations, trade associations, NGOs, community-based organisations, resident welfare associations, banks, and such other interests</li> </ul>
Non-gov. Private	Promoters & Implementation partners (IPs)	<ul style="list-style-type: none"> <li>ensure the long-term sustainability of CSFHs by 'adopting' a CSFH</li> <li>provide human resources and arrange for training or awareness campaigns for vendors and consumers</li> <li>identify peer leaders among the SFVs and mobilise the vendors in an area</li> <li>raise SFVs' awareness on FSSAI registration process and procedures; facilitate licence registration</li> <li>undertake periodic reviews of the CSFH area with peer leaders and arrange for refresher trainings; coordinate with local authorities to recognise SFVs who have adopted clean street food best practices</li> </ul>
Non-gov.	Auditing agencies	<ul style="list-style-type: none"> <li>central to the CSFH certification process</li> <li>carry out pre- and post-training audits to establish a baseline understanding of where the potential hub stands regarding food safety and hygiene practices</li> <li>identify needed improvements in SFV knowledge and practices</li> <li>provide information to training partners on gaps identified during audits</li> </ul>
Non-gov.	Training partners	<ul style="list-style-type: none"> <li>provide food safety and hygiene training to SFVs</li> </ul>
Non-gov.	Media	<ul style="list-style-type: none"> <li>publicise CSFHs and the CSFH certification process</li> <li>facilitate communicate with the public and among CSFH implementation partners (e.g. auditors, training partners, and others)</li> </ul>
NASVI		<ul style="list-style-type: none"> <li>raise vendor awareness on their rights as per the Street Vendors Act, 2014.</li> <li>conduct or organise awareness campaigns for vendors and consumers through street plays, flyers, posters, and Street Food Festivals</li> </ul>

## BOX 1. REQUIREMENTS FOR A CLEAN STREET FOOD HUB

The following should be present in a CSFH:

- adequate space for the orderly placement of vendor stalls for food handling, preparation, storing and service;
- a system allowing for the orderly flow of materials and goods in and out of the hub;
- proper placement of toilets, hand washing, and eating facilities;
- suitable and sufficient areas for waste storage and for cleaning and sanitising cooking utensils;
- a clean and well-maintained food preparation area;
- a smooth cement or glazed tile floor;
- windows covered with shatterproof glass and wire mesh;
- sufficient lighting to facilitate food preparation, handling, storage, and service.

Source: (24)

## IMPACT OF THE CLEAN STREET FOOD HUBS INITIATIVE

The CSFHI has not been formally evaluated, and there are no publicly available reports on food safety performance. However, based on statements by an FSSAI representative, positive changes have been noted anecdotally since the initiative began in 2018. As of May 2019, there were eight certified hubs in India, all of which were reported to perform well in terms of food safety and hygiene. Hub re-certification suggests sustained improvements, and audits indicate improved food safety and hygiene knowledge among SFVs in hubs. Post-training audit reports show that vendors generally comply with CSFH guidelines with regard to appropriate attire, acceptable materials for cleaning utensils and surfaces, and appropriate packaging for prepared foods. Hygiene is also improved due to the availability of antibacterial soap, disposable gloves, and lavatories (13). The FSSAI also reports indications of increased consumer trust in the street foods sold in the hubs; this could eventually lead to improved incomes for SFVs, but this has not been formally documented or assessed (13).

A CSFH online portal is available as a repository of resources and guidance for future CSFH promoters or implementation partners. Current promoters or implementation partners can periodically provide documentation of hub implementation for FSSAI assessment and annual recognition of the best implemented locations (25).

## CSFHI ENABLING FACTORS, CHALLENGES, AND FUTURE PROSPECTS

### ENABLING FACTORS

Several factors facilitated the development of the CSFH initiative. First was the existence of a legislative structure. The existing legislative framework (the Street Vendors Act 2014) enabled establishing a governance mechanism to improve the safety and hygiene of street foods (22). Second, organised civil society groups, such as NASVI, helped ensure that the 2014 SVLP Act

was being implemented. These groups also raised awareness among national, state, and local government actors and the public of the importance and value of street foods through the organisation of street food festivals, which now take place in India annually (Box 2) and are often attended by key political figures. Third, political support from FSSAI has been invaluable; they went beyond their routine regulatory role to bring together key stakeholders to work towards improved food safety and hygiene. The FSSAI plans to expand these efforts in the future by including fortified foods within the CSFHI.

Finally, the initiative involved numerous stakeholders, including SFVs, the media, state and

#### BOX 2. STREET FOOD FESTIVALS BRING ATTENTION TO CSFH AND STREET FOOD

An important supporter of SFVs and CSFHI training partner is the National Association of Street Vendors of India (NASVI), established in 1998 and advocating for the protection of the livelihood rights of thousands of street vendors across India. NASVI works with trade unions, community-based organisations, non-governmental organisations, and professionals. It has over 1,000 organisational members and 600,000 individual members.

NASVI has been organising street food festivals since 2009, aiming to celebrate Indian food and culture. The festivals also play a role in combatting the stereotypical view of street food as unhealthy and unhygienic and help show SFVs in a positive light. This is intended to help them obtain space in cities and gain respect from the public. Street food festivals bring together food vendors from different parts of the country. One is organised in New Delhi annually, followed by smaller multi-city festivals. Starting in 2017, FSSAI became a co-partner in organising these festivals. The 2018 festival benefitted from major government support. As these festivals are ticketed, they also generate revenue, 60% of which goes to the Street Vendors and 40% to NASVI (17, 26).

city governments, FDAs, and NGOs, ensuring a shared understanding and gaining widespread support and commitment. This partnership has provided opportunities to innovate, facilitate, and expand the initiative. FSSAI, as the driving force, helps facilitate implementation, and the involvement of the private sector as a long-term partner in supporting hubs helps improve the CSFHI's long-term sustainability.

### CHALLENGES AND BARRIERS

Several challenges exist regarding the CSFHs. One is related to the regulation and governance of SFVs and how to make systems fully functional and ensure political will exists to implement this initiative nationwide. As of 2018, only nine states have crossed a 50% benchmark with regard to implementation of the 2014 SVLP Act (22). A monitoring and incentive system needs to be put in place to increase compliance with the Act and thus



support CSFHI implementation. It is particularly important to legitimise and regulate vendors to comply with the standards called for by the CSFHI. As SFVs tend to be dispersed and afraid of being licensed due to the potential enforcement consequences (17), there is a need to assure SFVs that training and certification will not translate into additional costs but rather benefits, in terms of more regular customers.

As the CSFHI is in the early stages of implementation, it lacks consistently available and reliable data; better monitoring and evaluation of food safety and hygiene over a sustained period are necessary. While the yearly recertification process guarantees that SFVs are trained, more routine checks and supervision are needed to ensure that food safety and hygiene standards are upheld continuously.

Identification of areas to be considered for the CSFVI remains a challenge. Many SFVs do not want to leave a given area where they are known, so mapping of possible hub locations should consider SFVs' history and needs. Funding and coordination of the initiative also needs continued support. While the CSFHI was born in New Delhi through the FSSAI, more implementation partners are needed to take the initiative to other cities. The yearly CSFH certificate renewal process and associated trainings require sustained funding; non-corporate funding mechanisms should be explored, in case the focus of corporate social responsibility agendas changes.

### **THE WAY FORWARD FOR THE CSFHI**

FSSAI currently plans on expanding the CSFHI to more states is, building on the success and lessons learned of the initiative thus far. FSSAI attests that use of a multi-level approach with clusters of SFVs successfully draws more consumers to these fixed locations, thanks to the assurance of food safety (13). FSSAI is also acting to ensure that SFVs not in hubs also receive the benefits arising from the training and certification process and can take part in street food festivals. Non-hub SFVs are offered training under the Food Safety Training and Certification scheme. Around 50,000 SFVs have been trained, and efforts focus on trying to raise their awareness of the importance of maintaining proper food safety and hygiene. As the CSFHI expands, more SFVs may be willing to join hubs, allowing them to access facilities and perhaps increasing consumer trust in street food safety and hygiene (13).

While the CSFHI's primary focus is food safety and hygiene, there is scope to use the mechanism to also improve the nutritional quality of street foods. As a first idea, FSSAI is currently seeking to promote the use of fortified staples among SFVs. A potential next step is placing a broader focus on nutritional quality by inviting key stakeholders to help raise awareness of the nutritional content of various street foods and identify a mechanism to supply fortified staples at reasonable prices. At present, SFVs generally do not use fortified foods due to low awareness and availability barriers. A CSFH may be an ideal platform through which to trial the creation of a platform to enable SFVs to purchase fortified staples such as oil, wheat, and salt in bulk at reasonable prices (13).

### **CONCLUSION**

This working paper has described India's Clean Street Food Hub Initiative approach and its pathway to achieving improved food safety and hygiene of street foods. It examined how the

CSFHI has successfully engaged clusters of vendors through a multi-level approach involving all levels of government, right down to the municipality level. The initial focus on clustering of SFVs suggests that this governance mechanism, and its food safety and hygiene benefits, could potentially strengthen the food system in India due to the fact that it reaches a large part of the urban population who consume street foods. The contributions of FSSAI and NASVI are highlighted in the paper – the former taking the lead in the initiative and the latter actively creating opportunities to underline the important role of street vendors in Indian society through street food festivals. The challenge of reaching all SFVs remains, since many may not want to work in a fixed location. This limits the full potential of the CSFHI. For this reason, making training available to all SFVs, regardless of location, is a positive step towards improving food safety and hygiene of street foods throughout the country, both within and outside of the hubs.

It should be noted that this case study documents just one approach to the complex issue of improving street food safety in India; it does not intend to provide universal recommendations for the management of SFVs but seeks to give insights on elements that could be useful elsewhere. The growing evidence available suggests that the CSFHI can be an effective governance mechanism to support urban governance for nutrition more broadly and improve food safety specifically. Creating similar governance structures and processes will be integral to further promoting such an initiative in other areas and countries.

## REFERENCES

1. Singh AK, Singh NP, Chaturvedani AK. Food Safety and Hygiene Practices among Street Food Vendors in Noida, Uttar Pradesh, India. *Int.J.Curr.Microbiol.App.Sci.* 2018; 7(9): 2340-2347. Available from: <https://doi.org/10.20546/ijcmas.2018.709.291>.
2. Abrahale K, Sousa S, Albuquerque G, Padrão, P, Lunet N. Street food research worldwide: a scoping review. *J Hum Nutr. Diet.* 2019; 32, 152–174. Available from: <https://doi.org/10.1111/jhn.12604>.
3. Steyn NP, Mchiza Z, Hill J, Davids YD, Venter I, Hinrichsen E, et al. Nutritional contribution of street foods to the diet of people in developing countries: a systematic review. *Public Health Nutrition.* 2012; 17(6), 1363–1374. Available from: <https://doi.org/10.1017/S1368980013001158>.
4. Nonato IL, Minussi LOA, Pascoal GB, et al. Nutritional Issues Concerning Street Foods. *J Clin Nutr Diet.* 2016; 2:1. Available from: <http://dx.doi.org/10.4172/2472-1921.100014>
5. World Health Organization. Food Safety Key Facts. Geneva: World Health Organization, 2019. Available from: <https://www.who.int/news-room/fact-sheets/detail/food-safety> [Accessed 17 February 2020].
6. UNICEF. Reducing Stunting in Children Under Five Years of Age: A Comprehensive Evaluation of UNICEF's Strategies and Programme Performance – India Country Case Study. New York: United Nations Children's Fund, 2017. Available from: [https://www.unicef.org/evaldatabase/files/Stunting\\_Evaluation\\_India\\_Case\\_Study\\_final\\_report\\_2017-001.pdf](https://www.unicef.org/evaldatabase/files/Stunting_Evaluation_India_Case_Study_final_report_2017-001.pdf) [Accessed 05 April 2020].
7. Sezgin A, Sanlier N. Street food consumption in terms of the food safety and health. *Journal of Human Sciences.* 2016;13, 4072. Available from: [https://www.researchgate.net/publication/309198074\\_Street\\_food\\_consumption\\_in\\_terms\\_of\\_the\\_food\\_safety\\_and\\_health/citations](https://www.researchgate.net/publication/309198074_Street_food_consumption_in_terms_of_the_food_safety_and_health/citations) [Accessed 8 June 2019].
8. te Lintelo Dolf JH. The spatial politics of food hygiene: Regulating small-scale retail in Delhi. *European Journal of Development Research.* 2009; 21, 63–80. Available from: <https://doi.org/10.1057/ejdr.2008.10>.
9. Garode AM, Waghode, SM. Bacteriological status of Street-Vended foods and Public Health Significance, A Case study of Buldana District, MS, India. *ISCA Journal of Biological Sciences.* 2012; ISSN 2278-3202, 1(3): 69-71. Available from: <http://www.iufn.org/wp-content/uploads/2014/02/Garode-and-Waghode-2012-Bacteriological-status-of-Street-Vended-foods-and-Public-Health-Significance.pdf> [Accessed 6 June 2019].
10. Biswas, S, Parvez MAK, Shafiquzzaman M, Nahar S, Rahman MN. Isolation and characterization of *Escherichia coli* in ready-to-eat foods vended in Islamic University, Kushtia. *Journal of Bio-Science.* 2010;18(1): 99-103. Available from <https://doi.org/10.3329/jbs.v18i0.8783>.
11. Choudhury, M, Mahanta, LB, Goswami, JS, Mazumder MD. Will capacity building training interventions given to street food vendors give us safer food? A cross-sectional study from India. *Food Control.* 2011; 22(8):1233-1239. Available from: <https://doi.org/10.1016/j.foodcont.2011.01.023>.
12. Food Safety and Standards Authority of India (FSSAI). Clean Street Food Hubs Available from: <https://fssai.gov.in/CleanStreetFood/indexhome>.

13. FSSAI interview with staff from with Food Fortification Resource Centre (FFRC), Food Safety Management System (FSMS) and Digital Media, Public Relations & Corporate Engagement (FSSAI). Personal Communication. 8 May 2019.
14. Platenkamp L, Polack S, Mbuya MNN, Demmler KM, Kushitor SB, Moragues-Faus, A, et al. Urban governance for nutrition: Implications for enabling better nutrition for cities. Discussion Paper Series #4. Geneva: Global Alliance for Improved Nutrition (GAIN), 2020. Available from: <https://doi.org/10.36072/dp.4>
15. Ruel MT, Alderman H. Nutrition-sensitive interventions and programmes: how can they help to accelerate progress in improving maternal and child nutrition? *Lancet*. 2013; 382, 536–551.
16. Jha R. Strengthening Urban India's Informal Economy: The Case of Street Vending. New Delhi: Observer Research Foundation, July 2018; Issue 249. Available from: [https://www.orfonline.org/wp-content/uploads/2018/07/ORF\\_IssueBrief\\_249\\_StreetVending\\_FinalForUpload.pdf](https://www.orfonline.org/wp-content/uploads/2018/07/ORF_IssueBrief_249_StreetVending_FinalForUpload.pdf) [Accessed 7 July 2019].
17. Singh S. Head, NASVI Street Food Programme, National Association of Street Vendors of India (NASVI). Personal communication. 15 May 2019.
18. Self-Employed Women's Association (SEWA). Street Vendors' Laws and Legal Issues in India. WIEGO Law and Informality Resources. Cambridge: WIEGO; 2014. Available from: <https://www.wiego.org/sites/default/files/resources/files/Street%20Vendors%E2%80%9999%20Laws%20and%20Legal%20Issues%20in%20India.pdf> [accessed on 5 April 2020].
19. National Association of Street Food Vendors of India (NASVI). Street Food Vendors Food Safety Regulation, [presentation]. New Delhi: NASVI. 2019. Available from: [https://cdn.cseindia.org/userfiles/NASVI\\_presentation\\_final.pdf](https://cdn.cseindia.org/userfiles/NASVI_presentation_final.pdf) [Accessed 6 June 2019].
20. Roever S, Skinner C. Street vendors and cities. *Environment and Urbanization*. 2016; Vol 28, No. 2. Manchester: Women in Informal Employment: Globalizing and Organizing (WIEGO). Available from: <https://www.wiego.org/sites/default/files/migrated/publications/files/Roever-Skinner-streetvendors-cities-2016.pdf> [Accessed 15 October 2019].
21. Gorla, I. Project Manager, GAIN India. Personal Communication. 5 May 2019.
22. Government of India. The Street Vendors (Protection of Livelihood and Regulation of Street Vending) Act, 2014. New Delhi: The Gazette of India Extraordinary, 2014. Available from: <http://www.egazette.nic.in/WriteReadData/2014/158427.pdf> [Accessed 11 November 2019].
23. Food Safety and Standards Authority of India (FSSAI). Guidelines for Declaration as a Clean Street Food Hub. New Delhi: Ministry of Health and Family Welfare India, 2018. Available from: [https://fssai.gov.in/foodculture/doc/Fssai\\_Clean%20Street%20Food%20Hub-Declaration.pdf](https://fssai.gov.in/foodculture/doc/Fssai_Clean%20Street%20Food%20Hub-Declaration.pdf) [Accessed 24 April 2019].
24. Food Safety and Standards Authority of India (FSSAI). Clean Street Food Hub, Resources [website], [https://fssai.gov.in/CleanStreetFood/assets/docs/Guidance%20Document\\_Clean%20Street%20Food%20Hub.pdf](https://fssai.gov.in/CleanStreetFood/assets/docs/Guidance%20Document_Clean%20Street%20Food%20Hub.pdf) [Accessed 12 November 2019].

25. Food Safety and Standards Authority of India (FSSAI). Clean Street Food - Strategy and approach. New Delhi: FSSAI. Available from: <https://fssai.gov.in/> [Accessed 12 November 2019].
26. Food Safety and Standards Authority of India (FSSAI). Report on 1st National Eat Right Mela at IGNCA. New Delhi: FSSAI; 2018. Available from: [https://fssai.gov.in/upload/knowledge\\_hub/928225ca1fec22dfedReport\\_NERM\\_25\\_02\\_2019\\_compressed\\_compressed.pdf](https://fssai.gov.in/upload/knowledge_hub/928225ca1fec22dfedReport_NERM_25_02_2019_compressed_compressed.pdf) [Accessed 11 November 2019].
27. Narang P, Goyal Y. Street Vendors Act 2014. State Compliance Index 2017. New Delhi: Centre for Civil Society, 2017. Available from: [https://ccs.in/sites/all/books/com\\_books/street-vendor-act-compliance-report2017.pdf](https://ccs.in/sites/all/books/com_books/street-vendor-act-compliance-report2017.pdf) [Accessed 11 November 2019].
28. Government of India. Food Safety and Standards Act, 2006. New Delhi, 2006. Available from: <http://nasvinet.org/newsite/wp-content/uploads/2018/05/FOOD-SAFETY-AND-STANDARDS-ACT-2006.pdf> [Accessed 11 November 2019].
29. Government of India. National Policy on Urban Street Vendors, 2005. New Delhi, 2005. Available from: [https://www.prsindia.org/uploads/media/1167478283/bill82\\_2006123082\\_National\\_Policy\\_for\\_Urban\\_Street\\_Vendors.pdf](https://www.prsindia.org/uploads/media/1167478283/bill82_2006123082_National_Policy_for_Urban_Street_Vendors.pdf) [Accessed 11 November 2019].
30. Government of India. National Policy on Urban Street Vendors, 2009. New Delhi, 2009. Available from: <https://casi.sas.upenn.edu/sites/default/files/iit/National%20Policy%20on%20Urban%20Street%20Vendors%2C%202009.pdf> [Accessed 11 November 2019].
31. Food Safety and Standards Authority of India (FSSAI). Food Safety and Standards Rule, 2011, New Delhi: FSSAI, 2011. Available from: <https://www.fssai.gov.in/cms/food-safety-and-standards-rules--2011.php> [Accessed 11 November 2019].



## ANNEX

### A1. LEGISLATIVE AND INSTITUTIONAL FRAMEWORK SUPPORTING THE CSFH INITIATIVE

Establishment of an initiative like the CSFH is greatly facilitated by having an existing legislative and institutional framework related to street food vending. In India, this was Section 3.2 of the *Street Vendors (Protection of Livelihood and Regulation of Street Vending) Act 2014* (25), which calls for the establishment of central vending zones for SFVs in all Indian cities.<sup>2</sup> The Street Vendors Act 2014 calls for: establishment of town vending committees; demarcation of central vending zone; rules for SFVs (specific conditions for and restrictions on street vending); and licensing and renewal of street vendor certificates after a one-year period. Furthermore, the Act supports the right to vend, the creation of a town vending committee, the prevention of harassment, and the creation of a redress mechanism (25). As of 2018, only nine states out of 29 had achieved at least 50% compliance with implementing the Street Vendors Act 2014. This reflects the need to further strengthen the Act's implementation (31).

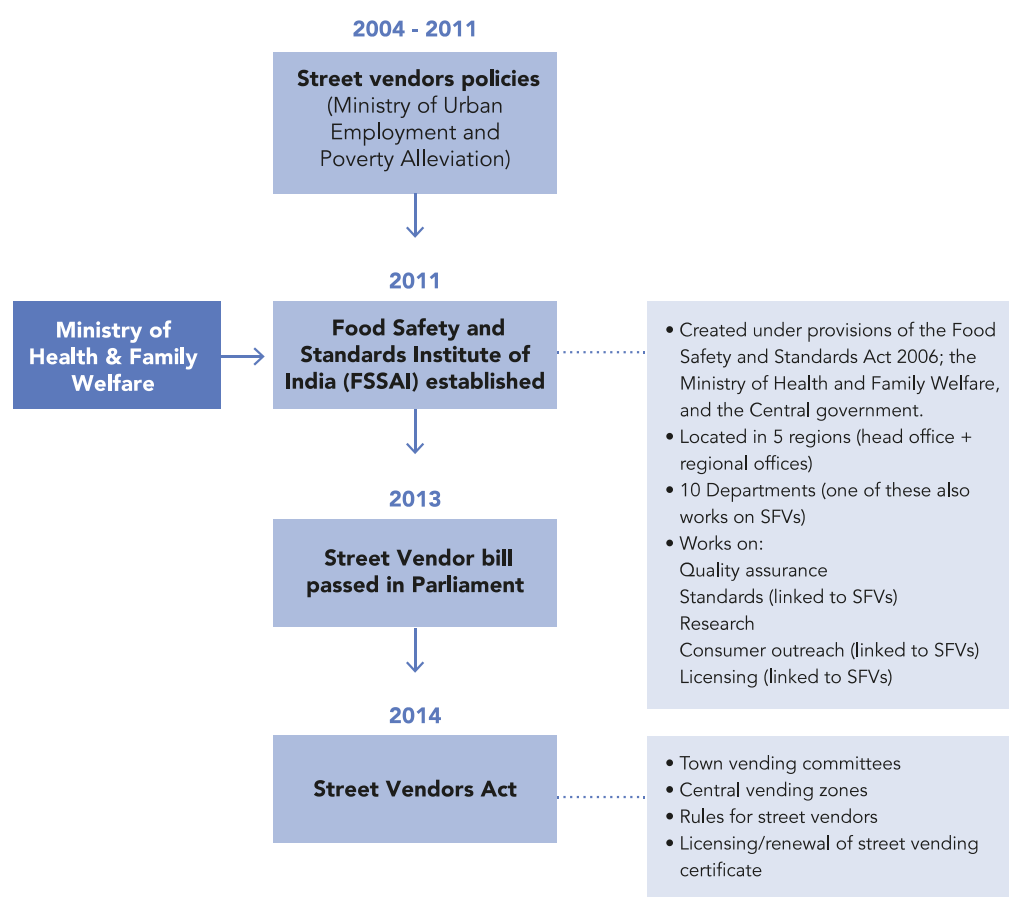


Figure 1A. Legislative and institutional framework for the Clean Street Food Hub Initiative (CSFH). Own illustration.

<sup>2</sup> The *Food Safety and Standards Act 2006* (27), which was implemented in 2011, and a series of street vendor policies (28, 29 30) also paved the way for The Street Vendors Act 2014.