



# Labelling & Display 2020

**Effective food labelling: For regulatory compliance & consumer.....**

# About Myself



- ▶ Postgraduate with more than 21 years Techno-Commercial Experience.
- ▶ Native of Himalaya Foothills – Dehradun, Uttarakhand.
- ▶ Vice President – ICMA – Indian Confectionery Manufacturing Association
- ▶ Past Vice chairman – Regulatory Affairs Technical Committee - AIFPA
- ▶ Key Competencies :
  - Regulatory Affairs, QMS & FSMS, QA/Quality Control
  - Manufacturing & Operations
  - Certified QMS/FSMS/ISO 14000 LA Courses – DNV/BVQI



Regulatory Affairs



Regulatory Affairs



QA/QC/QMS/  
FSMS/Manufacturing



QA/QC/RSA/  
Manufacturing

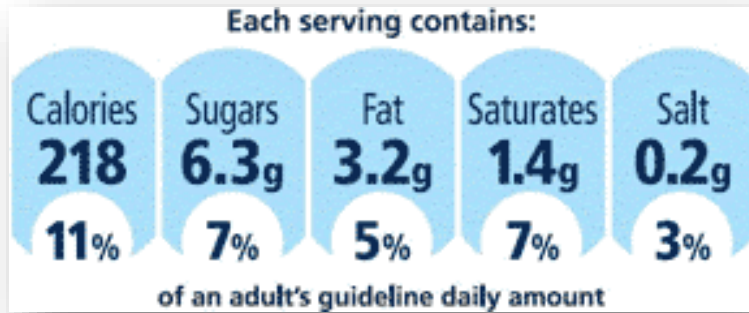


Microbiologist/Chemist/QMS

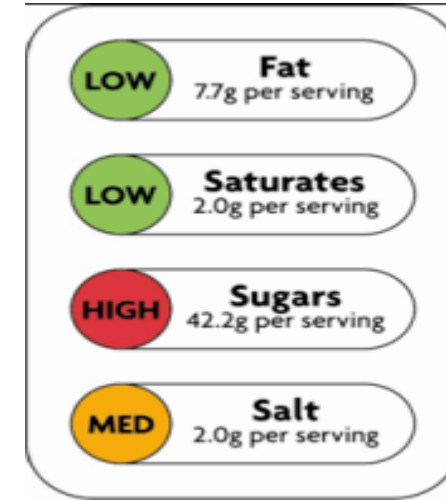
# Impact Of Food Labelling Systems On Food Choices

- FOP labels are more noticeable than the traditional labeling. (GDA and Traffic light schemes )

GDA →



Traffic Light Schemes →



- Claims (Perception of “healthfulness of a product” )



Consumer believe that the product is more healthful (due to fibre claim) than similar kind of products

ABC  
Product

No  
Claims



# Impact Of Food Labelling Systems On Food Choices

## Communicator and Communication of the Ad

## Religious Reasons



Halal Logo

Veg Logo

## Origin of the product ( Made in India Vs Made in China )



Made in China



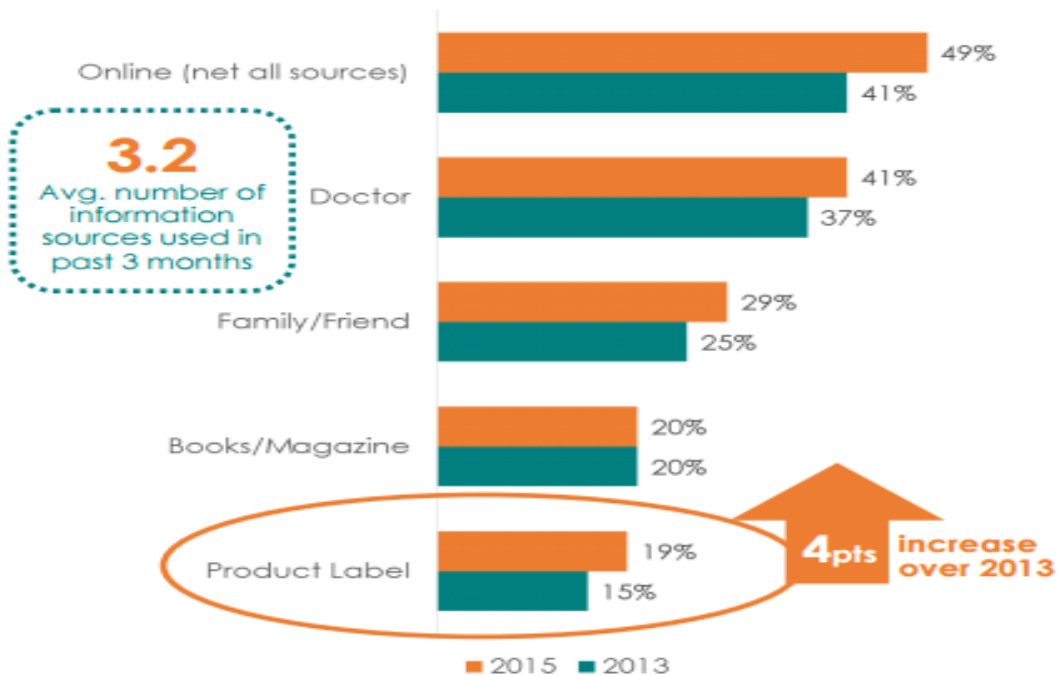
Made in India



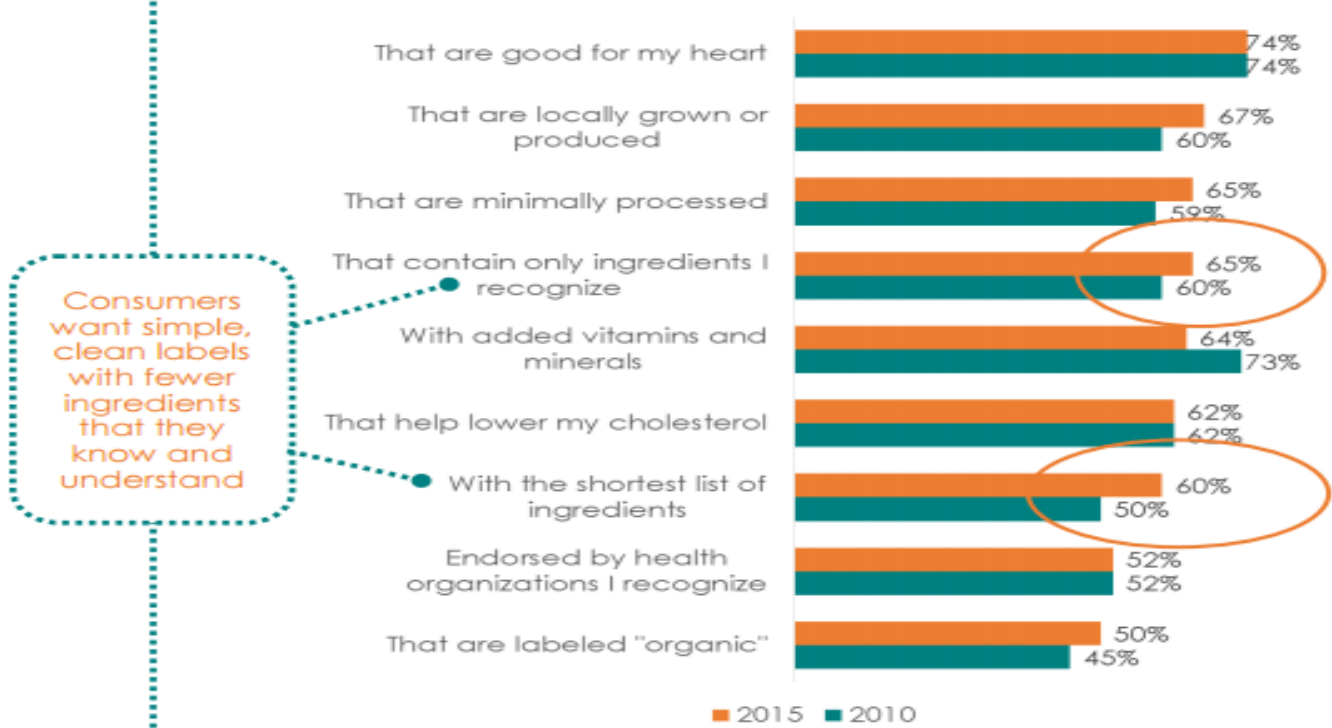
# what consumers want on **FOOD LABELS**

Consumers are paying closer attention to food and beverage labels, scrutinizing what's on the label more today than ever before. While much of the actual label reading occurs at the shelf in a store, the cultural forces behind reading labels are heavily influenced by what is happening in consumers' home lives and where they are positioned in the core, mid-level or periphery in terms of the World of Wellness. A broad range of influences drives consumers to carefully analyze labels that include the effects of the media, consumer life stage, health conditions, food safety and freshness concerns, as well as diet and weight management programs.

## TOP 5 INFORMATION SOURCES CONSUMERS USE TO LEARN ABOUT HEALTH & WELLNESS



## WHEN SHOPPING, I LOOK FOR FOODS AND BEVERAGES:



Source: Health & Wellness 2015 report, The Hartman Group

# Global Food Labelling Regimes

## Original Label

<b>Nutrition Facts</b>	
Serving Size 2/3 cup (55g) Servings Per Container 8	
<b>Amount Per Serving</b>	
<b>Calories</b> 230	Calories from Fat 72
<b>% Daily Value*</b>	
<b>Total Fat</b> 8g	<b>12%</b>
Saturated Fat 1g	<b>5%</b>
Trans Fat 0g	
<b>Cholesterol</b> 0mg	<b>0%</b>
<b>Sodium</b> 160mg	<b>7%</b>
<b>Total Carbohydrate</b> 37g	<b>12%</b>
Dietary Fiber 4g	<b>16%</b>
Sugars 12g	
<b>Protein</b> 3g	
<b>Vitamin A</b> 10%	
<b>Vitamin C</b> 8%	
<b>Calcium</b> 20%	
<b>Iron</b> 45%	
* Percent Daily Values are based on a 2,000 calorie diet. Your daily value may be higher or lower depending on your calorie needs.	
	Calories: 2,000 2,500
Total Fat	Less than 65g 80g
Sat Fat	Less than 20g 25g
Cholesterol	Less than 300mg 300mg
Sodium	Less than 2,400mg 2,400mg
Total Carbohydrate	300g 375g
Dietary Fiber	25g 30g

## New Label

<b>Nutrition Facts</b>	
8 servings per container	
<b>Serving size</b>	<b>2/3 cup (55g)</b>
<b>Amount per serving</b>	
<b>Calories</b>	<b>230</b>
<b>% Daily Value*</b>	
<b>Total Fat</b> 8g	<b>10%</b>
Saturated Fat 1g	<b>5%</b>
Trans Fat 0g	
<b>Cholesterol</b> 0mg	<b>0%</b>
<b>Sodium</b> 160mg	<b>7%</b>
<b>Total Carbohydrate</b> 37g	<b>13%</b>
Dietary Fiber 4g	<b>14%</b>
Total Sugars 12g	
Includes 10g Added Sugars	<b>20%</b>
<b>Protein</b> 3g	
<b>Vitamin D</b> 2mcg	<b>10%</b>
<b>Calcium</b> 260mg	<b>20%</b>
<b>Iron</b> 8mg	<b>45%</b>
<b>Potassium</b> 235mg	<b>6%</b>
* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.	

- 1 The serving size now appears in larger, bold font and some serving sizes have been updated.
- 2 Calories are now displayed in larger, bolder font.
- 3 Daily Values have been updated.
- 4 Added sugars, vitamin D, and potassium are now listed. Manufacturers must declare the amount in addition to percent Daily Value for vitamins and minerals.

# Global Food Labelling Regimes

## EUROPE-Amendment 171

European Union: Vegan 'dairy' products face EU ban from using milk cartons and yoghurt pots – and UK could be next



### Reason

- Consumer Protection- To protect the consumer from being misled by words like 'Dairy', 'Milk', 'Yogurt' for Vegan products

**Concerns of Vegan Producers**-Rebranding, Renaming and Rethinking marketing strategies with additional costs

## INDIA

### India- Labelling and Display Regulation 2020



### Key Amendments

- Nutritional Information
- Declaration regarding Food additives
- Non-Veg Log
- FSSAI Logo
- Wholesale package
- Font Size
- Manufacturer Address
- Date Marking

# HOW TO ENSURE KEY COMPLIANCES – BEST PRACTICES

## While reviewing Recipes

1. **Make sure Recipe/Formulation change is identified**
2. **Source of the Ingredients and Additives**
3. **Cross contamination from the shared lines - Allergens**
4. **Identification of Allergen from your suppliers process**
5. **Compound Ingredients and Non Permitted Additives**
6. **Level of Additives (specially Colors < 100ppm all put together)**



# HOW TO ENSURE KEY COMPLIANCES – BEST PRACTICES

## While reviewing Label/Artwork

1. Legibility
2. Prevent Misleading Labelling having deliberate attempts
3. Sometime Producer does not aim to mislead but Consumer makes Misinterpretation.
4. Correct INS numbers
5. Date marking and Its format
6. Values in Nutritional information and Tolerance – More focus of field FSOs.
7. Unapproved ingredients
8. Correctness of Address
9. Veg and non veg source of ingredients including GMOs and Halal
10. Pictorial representations & their %age declaration
11. Claims Specially “Health” & “Non Addition”
12. MoP (Method of Preparation wherever required)
13. Non Standard Sizes, MRP & Mfg Address - Legal Metrology
14. Check in case BIS Mark required
15. Ensure correct License Number
16. Make sure Recipe/Formulation change is identified – Periodical reviews
17. Voluntary Information should be well substantiated and factual
18. Periodical review of Owned and In Market Labels
19. Micronutrients

# Packaging and Labelling Regulations 2011

## **Chapter 1**

1.1.1 Short Title and commencement

2.1.2 Definition (12 Definitions)

## **Chapter 2 Packaging and Labelling**

### **1. Packaging**

1. : General Requirements

2. : Product specific requirements

### **2. Labelling**

1.: General Requirements ( 7 points )

2.2.2: Labelling of Prepackaged foods

1.Name of the food

2.List of ingredients

3.Nutritional information including **definitions for Health claims, Nutrition claims and Disease risk reduction claims**

4.Declarations regarding Veg and Non Veg

5.Declaration regarding Food Additives

6.Name and complete address of the manufacturer

7.Net quantity

8.Lot/Code/Batch identification

9.Date of Manufacture or packing

10.Best Before and Use by date

11.Country of origin for imported foods

12.Instructions for use

# FSS (LABELLING AND DISPLAY) REGULATIONS, 2020

**1. Short Title and Commencement.** -((2) These regulations prescribe the labelling requirements of pre-packaged foods and display of essential information on premises where food is manufactured, processed, served and stored.

**2.1 Definition (22 Definitions)** with changes in existing definitions

**3. The FSSAI may establish an internal mechanism to address the problem arising out of implementation/ interpretation of the regulations.**

## **CHAPTER- 2 LABELLING OF PREPACKAGED FOODS**

**4. General Requirements.**

**5. Labelling Requirements.**

(1) The Name of Food.

(2) List of Ingredients:

(3) Nutritional information.

(4) Declaration regarding Veg or Non veg.-

(5) Declaration regarding Food Additives.

(6) Declaration of name and complete address.

(7)FSSAI logo and license number.

(8) Net quantity, **Retail Sale Price and Consumer Care details.**

(9) Lot/Code/Batch identification.

(10) Date Marking.

(11) Labelling of Imported Foods.

(12) Country of Origin for Imported Foods

(13) Instructions for use.

**(14) Declaration regarding Food allergen:**

**(15) Food material not meant for human consumption**

## Packaging and Labelling Regulations 2011

### 1. : Manner of Declaration

1.: General

Conditions 2.3.2:

Principal Display

Panel

2.3.3: The height of numeral in the declaration

### 4. : Specific Requirements/ Restrictions on manner of labelling

2.4.1:

Labelling of infant milk substitutes and infant foods 2.4.2: Labelling of edible oils and fats

3. : Labelling of permitted food colors

4.: Specific labelling requirements of other products 2.4.5: Specific restriction on product label

### 5.: **Restriction on advertisement**

### 6.: Exemptions from Labelling requirements

## FSS (LABELLING AND DISPLAY) REGULATIONS, 2020

### 6. Principal display panel.

### 7. Mandatory Declarations.

### 8. Exemptions from certain labelling requirements

CHAPTER- 3 9. Display of information in food service establishments

CHAPTER 4 10. Labelling Requirements of non-retail container

CHAPTER 5 LABELLING OF FOOD ADDITIVES WHEN SOLD AS SUCH

11. Labelling of packaged Food Additives for Retail Sale

12. Labelling of Pre-packaged Food Additives Sold other than by Retail

Schedule-I Logo for Fortified foods and organic foods

Schedule-II 1. Mandatory Declarations:

2. Specific requirements/ restrictions on manner of labelling

2.1 Labelling of edible oils and fats

2.2 Coffee-Chicory Mixture

2.3 Labelling of Milk and Milk products

2.4 Labelling prohibitions for drinking water (both packaged and mineral)

2.5 Labelling of 'Gluten Free' products

# Nutritional Information

Existing Regulation 2.2.2.(3)– FSSR (P&L) 2011:  
Nutritional facts **per 100 g or 100 ml or per serving** of the product

ABC Product	
Nutritional Information (Per 100 g)	
Energy (kcal)	556
Protein (g)	8.4
Carbohydrate (g)	50.3
Of which Sugar (g)	1.1
Fat (g)	35.6
Trans fat (g)	0.0
Saturated fat (g)	16.1

No Specific tolerance given for declared nutrients

Amending Regulation 4.2.(3).(b)– FSSR (L&D) 2020:  
Nutritional facts **per 100g or 100ml of the product and per serve percentage (%) contribution to RDA**

ABC Product			
Nutritional Information	Per 100 g	Per Serve	%RDA Contribution Per Serve
Energy (kcal)	556	83	4
Protein (g)	8.4	1.3	-
Carbohydrate (g)	50.3	7.5	-
Sugars (g)	1.1	0.2	-
Added Sugar (g)	0.1	0.01	0.02
Total fat (g)	35.6	5.3	8
Trans fat (g)	0.0	0.0	0
Saturated fat (g)	16.1	2.4	11
Cholesterol (mg)	0.0	0.0	-
Sodium (mg)	991	149	7
One Serving = 15 g.			
Number of servings in the Package = 2 (for a 30 g pack)			

The tolerance of maximum minus 10 percent of the value for that nutrient declared.



# Declaration regarding Food Additives

Before	After
<p data-bbox="122 386 1256 525">Existing Regulation 2.2.2.(5)– FSSR (P&amp;L) 2011: Separate Declaration statement for colour and flavours below the ingredient list.</p> <p data-bbox="122 586 1256 829">Ingredients: Refined wheat flour (Maida), Sugar (26.4%), Refined palm oil, Invert syrup, Milk solids, Starch, Raising agents [INS 503(ii), INS 500(ii), INS 450(i)], Coconut milk powder, Iodized salt, Emulsifiers [INS 322(i), INS 471] and Flour treatment agent (INS 223).</p> <p data-bbox="147 891 1238 1082"><b>CONTAINS PERMITTED NATURAL FOOD COLOUR(S) (INS 150d) AND SYNTHETIC FOOD COLOUR(S) (INS 102) AND ADDED FLAVOUR(S) (NATURE IDENTICAL FLAVOURING SUBSTANCES, ARTIFICIAL FLAVOURING SUBSTANCES - VANILLA)</b></p>	<p data-bbox="1454 386 2288 525">Current 2.5.5 FSSR (L&amp;D) 2020 Both colour and flavour declaration in the list of ingredients</p> <p data-bbox="1294 586 2435 882">Ingredients: Refined wheat flour (Maida), Sugar (26.4%), Refined palm oil, Invert syrup, Milk solids, Starch, Raising agents [INS 503(ii), INS 500(ii), INS 450(i)], Coconut milk powder, Iodized salt, <b>Nature identical flavouring substances</b>, Emulsifiers [INS 322(i), INS 471], <b>Colours (INS 150d, INS 102), Artificial flavouring substances (Vanilla)</b> and Flour treatment agent (INS 223).</p>
<p data-bbox="351 1168 1029 1208">No Specific law for allergen declaration</p>	<p data-bbox="1352 1168 2390 1258">8 listed allergen declaration under 2.5.5.14 FSSR (L&amp;D) 2020 Contain Soy. May contain Milk</p>

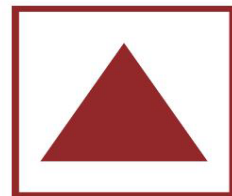
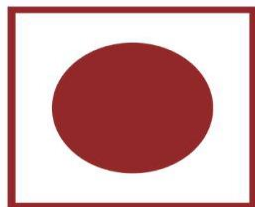
# Declaration regarding Food Additives

Before	After
Onion Powder [Anticaking Agent (INS 551)]	Onion Powder (Only those additive having Technical function in final product)
<b>Carry over additives – A DECADE ISSUE</b>	
Ingredients of Compound Ingredients- Needed to be separately declared in bracket in the list of Ingredients	Ingredients of Compound Ingredients- They can be declared as individual ingredients in the list of ingredients
Seasoning was not declared as a flavor ingredient	Seasoning can be declared as a flavor ingredient

# FSS (P&L) 2011

# FSS (L&D) 2020

## 1. NON VEG Logo



## 2. FSSAI Logo



Lic. No. XXXXXXXXXXXXXXXX



Lic. No. XXXXXXXXXXXXXXXX

## 3. Wholesale Package



- (1) The Name of Food
- (2) The name and address
- (3) Total number of retail package or number of the commodity



- (1) The Name of Food.
- \*(2) List of Ingredients:**
- \*(3) Nutritional information.**
- \*(4) Declaration regarding Veg or Non veg.-**
- (5) NOT FOR RETAIL SALE
- ^(6) Declaration of name and complete address.**
- ^(7) FSSAI logo and license number.**
- (8) Net quantity.
- (9) Lot/Code/Batch identification.
- (10) Date Marking.

Are that much information is required for a pack meant only for **transportation purposes.**

FSS (P&L) 2011 didn't stipulated requirements for wholesale however same is given under legal metrology

**\* In the accompanying documents**

**^ In a Barcode/Global Trade Identification Number (GTIN)**

## FONT SIZE - A big Problem

No	Weight / Volume	Min height of numeral in mm	
		Normal case	Blown, formed, . .
1	Up to 50 g/ml	1	2
2	Above 50 g/ml up to 200 g/ml	2	4
3	Above 200 g/ml up to 1 kg/L	4	6
4	Above 1 kg/L	6	8

No	Area of Principal Display Panel	Min height of numeral in mm	
		Normal case	Blown, formed, . .
1	Up to 100 cm sq.	1	2
2	Above 100 cm sq. up to 500 cm sq.	2	4
3	Above 500 cm sq. up to 2500 cm sq.	4	6
4	Above 2500 cm sq.	6	8

### As per FSSR (P&L) 2011



### As per FSSR (P&L) FSSR (L&D) 2020





## DECLARATION OF NAME AND COMPLETE ADDRESS.



Lic.No.10012031000430

Brand Owned by XXX Limited, XXXXXXXXXXXXX,  
55, TLC Road, Kolkata-700071.

Manufactured By: **XXX LIMITED, Plot No 1, Sector  
11, IIE, Banras, UPDIC, Uttara Pradesh  
(UP),249403.Lic.No-10012012000165**



Lic.No.10012031000430

Brand Owned by XXX Limited, XXXXXXXXXXXXX,  
55, TLC Road, Kolkata-700071.

Manufactured By: **Lic.No-10012012000165**

## DATE MARKING

**Existing Regulation 2.2.2. (10)– FSSR (P&L)  
2011:**

**BEST BEFORE DECLARATION**

**BEST BEFORE: 31/12/2019**

**BEST BEFORE SIX MONTHS FROM MANUFACTURE**

**Amending Regulation 4.2.(10)– FSSR (L&D) 2019:**

**EXPIRY/ USE BY**

**EXPIRY (or) USE BY: 31/07/19**  
*(shelf life less than 3 months)*

**EXPIRY (or) USE BY: AUG 2019**  
*(shelf life more than 3 months)*

# Expectation of Consumer From Industries



Transparency (Veg. vs Non Veg)



**“Legibility” Studies show that easy legibility is an important element**

## Top 5 ingredients consumers **DO NOT PREFER**

### Baking Bread

- Artificial colors
- Mono and di glycerides
- Modified cellulose
- Sucrose
- Sodium Stearoyl lactylate

### Cooking Sauces

- Artificial colors
- High-Fructose corn syrup
- Artificial flavors
- Sodium phosphate
- Xanthan gum

### Ready-to-Drink Bottled Tea

- High-fructose corn syrup
- Artificial color
- Potassium sorbate
- Malic acid
- Corn syrup

### Sweet Baked Goods

- High Fructose corn syrup
- Artificial colors
- Artificial flavors
- Propylene glycol monoesters
- Sodium Benzoate

### Ready-to-drink bottled coffee

- Disodium phosphate
- Artificial flavors
- Potassium hydroxide
- Potassium phosphate dibasic
- Potassium carbonate

### Frozen Chicken Appetizers

- Artificial flavor
- Artificial color
- Sodium phosphate
- Maltodextrin
- Dextrose

# Expectation Of Consumer From Industries



Clean Label

Nutrition Facts		Amount/serving	%DV*	Amount/serving	%DV*
Serv. Size 6 2/25 oz (172g)		<b>Total Fat</b> 18g	<b>28%</b>	<b>Total Carb.</b> 31g	<b>10%</b>
Serv. Per Cont. 3		Sat. Fat 8g	40%	Fiber 2g	6%
Calories 370		Trans Fat 0g		Sugars 4g	
Fat Cal. 160		<b>Cholest.</b> 40mg	<b>14%</b>	<b>Protein</b> 20g	
		<b>Sodium</b> 1040mg	<b>43%</b>		
		*Percent Daily Values (DV) are based on a 2,000 calorie diet.			
		Vitamin A 10% • Vitamin C 6% • Calcium 35% • Iron 15%			

INGREDIENTS: Pizza Crust (Wheat Flour, Water, Soybean Oil, Yeast, Sugar, Salt, Calcium, Propionate, L-cysteine.), Low Moisture Part Skim Mozzarella Cheese (pasteurized part skim milk, cheese culture, salt, enzymes), powdered cellulose (to prevent caking) potassium sorbate and natamycin (preservatives), Tomato Sauce (Tomato Concentrate Made From Red Ripe Tomatoes, Salt, Citric Acid, Red Bell Pepper Powder, Natural Flavoring, Spice.), Beef Sausage Crumbles (beef, water, salt, spice, sugar, monosodium glutamate, sodium phosphate, BHA, propyl gallate, citric acid), Water, Tomato Paste (tomatos, citric acid), Pork Pizza Topping (pork, water, textured vegetable protein (soy flour, isolated soy protein, caramel coloring) spices, salt, sodium phosphate, sugar, garlic powder, monosodium glutamate), Canadian Style Bacon water added (cured with water, salt, dextrose, corn syrup, sodium phosphate, sodium erythorbate, sodium nitrite), Pepperoni (pork, beef, salt, contains 2% or less of water, dextrose, natural flavorings, natural smoke flavoring, sodium ascorbate, garlic powder, oleoresin of paprika, lactic acid starter culture, sodium nitrite, citric acid, BHA, BHT.), Pizza Sauce Seasoning (salt, spices, onion, garlic, natural flavors, parsley)

CONTAINS: MILK, SOYBEANS, WHEAT

Labels with a short list of ingredients, and easy to pronounce ingredients familiar to the purchaser

Health Focus International findings show that 67% of global shoppers believe it is important on a food ingredient label that most of the ingredients are things they recognize and would use at home, and nearly half think a food or beverage is more natural if there are fewer ingredients on the label.



# Expectation of Consumer From Regulators - Basis Consumer Queries

- High Fines/ Penalties



- Workshops and seminars



- Appropriate policies & Easy Access to Policies

**Empowering Consumers**

**5 Priority Areas**

- Promote food safety and hygiene to prevent foodborne illnesses
- Promote healthy diets to prevent NCDs
- Combat food adulteration and food fraud
- Promote fortified foods to prevent micronutrient deficiencies
- Prevent food waste and fight hunger

**FSSAI's Smart Approach**

- S** Social and behavioural change
- M** Multistakeholder partnerships
- A** Available policy and regulatory support
- R** Robust consumer complaint handling system
- T** Triggering

**Social and Behavioural Change**

**Engage:** Engage with consumers wherever they are in interesting and interesting ways.  
**Excite:** Excite them about the benefits of safe food and healthy diets.  
**Enable:** Enable and support them to change habits of food and demand safe and healthy food.

**Nudging** all 130-core Indians to demand safe food and healthy diets is the most powerful tool to build a culture of food safety. Social and behaviour change interventions have been designed to engage, excite and enable consumers to become partners in driving this change.

**Convergence with Government Programmes**

The best way to achieve scale and to sustain consumer awareness and educational activities is through convergence with established government programmes. Five relevant programmes include (1) National Health Mission with renewed focus on wellness under 'Aarogya Bharat Yojana', (2) Integrated Child Development Services (ICDS) scheme for children under 6 years of age and their mothers, (3) Mid-Day Meal (MDM) scheme for school children, (4) Multi-ministerial POSHAN Abhiyan for a malnutrition-free India by 2022 and (5) Anand-Bharat to reduce anaemia by one-third by 2022.

**The Eat Right Toolkit**

The Eat Right Toolkit and an online video course on food safety and nutrition have been developed for the frontline workers namely Auxiliary Nurse Midwives (ANMs), Accredited Social Health Activists (ASHAs), Anganwadi Workers (AWWs - supervisors for rural child care centre) and Mid-Day Meal supervisors. Through 22,000 ANMs, 87,000 ASHAs workers under the Ministry of Health and Family Welfare and 12,93,000 AWWs under the Ministry of Women and Child Development, a very extensive reach of eat-right messaging across the country is possible. Over 2000 frontline workers have already been trained to maintain the Eat Right Toolkit for community education and outreach. Eventually, this toolkit would be mainstreamed in all the 1,50,000 Health and Wellness Centres under Aarogya Bharat Yojana.

- Quick Adulteration Test Methods



- Regular/Periodic Surveillance Mechanisms



Legibility Didn't Identified as a problem

- Easy Access to Labs/ Testing







# Responsible Businesses and Hand holding of SMSE

Plant Training



Help in Interpreting the Law



Regulatory Awareness Program



**TOGETHER  
WE CAN**

Advocacy



# New Initiatives by FSSAI

## Impact :

- May lead industries to change their product formulation and manufacturing processes
- Correct the Advertisements
- Change in Labels

### FoSCoS

FSSAI launched Food Safety Compliance System (FoSCoS) wef **01st June 2020** replacing existing Food Licensing and Registration System.

### FSS (Auditing)

FSSAI has envisaged audits of FBO through Private Auditing Agencies. This will strengthen food safety surveillance system and encourage self compliance.

### Hygiene Rating

Hygiene rating is a voluntary scheme applicable to food businesses supplying food directly to consumers, food businesses are rated on the basis of food hygiene and safety conditions

### FoSCoRIS

FSSAI has launched 'FoSCoRIS', a nationwide online platform to bring in transparency in food safety inspection and sampling.

### Trans Fat

1. To eliminate trans fat from the diets of the consumers.
2. Till 2022 target for 2 % trans fat

### Repurpose of used cooking oil (RUCO)

Ensuring food safety across food value chain including repurpose of used cooking oil (RUCO) **1. Maximum limit for Total Polar Compounds for cooking oil at 25%**  
**2. Under this reused oil can only be handed to registered collecting agency and data need to maintained**

### Culture of Self compliance

Self compliance culture – Fostac is mandatory in nature (One trainer for 25 every food handlers to ensure food safety. **FSSAI started issues notice regarding for mandatory training**







# FSS BILL 2020

## Significant Changes



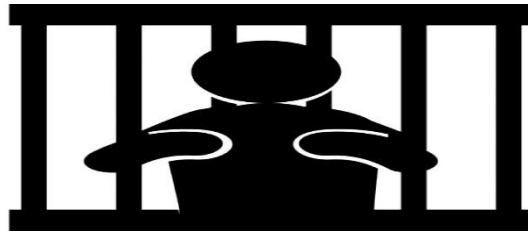
Animal feed



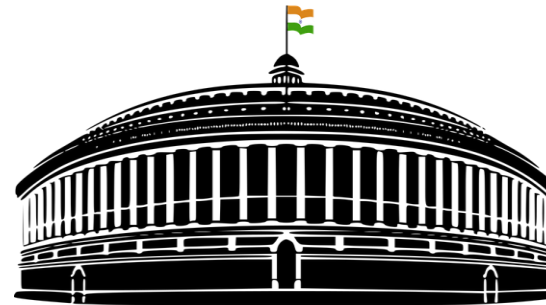
Food contact material



export



significant increase in penalties



— PARLIAMENT OF INDIA —

In Emergencies FSSAI is Empowered to make law without consulting the parliament. **More holistic approach is required to execute these powers.**



Additional powers given to FSOs

# Consumer Protection Act 2019

- ❖ **Consumer Protection Bill, 2018** was introduced by Hon'ble Consumer Affairs Minister Ram Vilas Paswan in the Lower House and it seeks to replace the 31-year-old law.
- ❖ **Enforce from 9th August, 2019**
  - Central Consumer protection authority (CCPA) can - issue safety notices, pass orders to recall goods, prevent unfair practices, and reimburse purchase price paid.
  - As per new law CCPA can make new rule . (Previously there is no provision for making rule)
  - Misleading Advertisements will attract series penalty ( Rs 50 lakh and imprisonment upto 5 years)
  - Against adulteration, fine up to Rs 10 lakh and life term imprisonment.
  - New Liability Clauses will have serious impact on Companies (provisions for product liability action on account of harm caused to consumers due to a defective product and deficiency in services.)
  - Courts Can work towards settlement through mediation cells. (No provision in 1986 ACT )
  - **As per new Pecuniary jurisdiction of Commissions**
    - District: Up to Rs one crore. (Previously 20 Lakhs )
    - State: Between Rs one crore and up to Rs 10 crore. (20 lakhs – 1 Crore )
    - National: Above Rs 10 Crore. (above 1 Crore)uniary





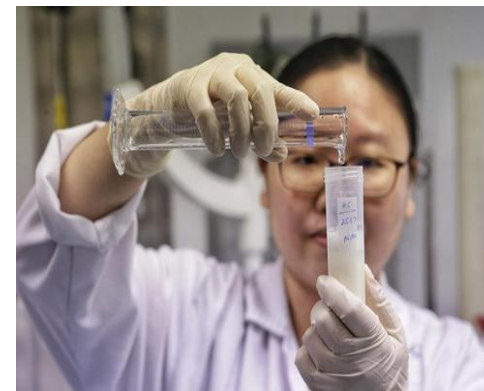
## **Abolition for Sanitary Import Permit (SIP) for import of Milk Powder and other Dairy Products:**

- (i) SIP is valid only for **3 months from the date of issue**
- (ii) There is duplication of work for the FBO's

### **Export of Milk and Milk Products (Rule & Order) 2020**

Milk and milk products must be subjected to quality control or inspection or both prior to export in cases

- Competent Authority will be carrying out Quality Control Inspection
- Ambiguity related to definition of milk products and composite milk products
- Validity of certification: Three Years (previously One year)



# Changing FSMA-The way Food Industry Works



## Focus-

Change from responding to contamination to preventing it

## IMPORTING FOOD PRODUCTS INTO THE U.S.

### 1. International Cooperation on Food Safety

- Systems Recognition
- Equivalence-



### 3. Accredited Third-Party Certification



### 2. Foreign Supplier Verification Program (FSVP)



### 4. Firm/Supplier Evaluation Resources for FSMA Rules



# Challenges of FSMA

## 1. Supply chain Management

- Ensure rigorous supply chain management
- Focus on Foreign Supplier Verification Program (FSVP)
- Focus on written assurances required by Preventive controls rule

## 2. To meet the documentation requirement for Preventive Controls Rule

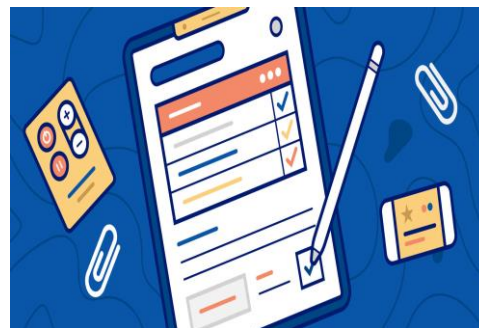
- Proper documentation of Food safety requirement
- Things that have to be written down and the details to be included
- Manage the documentation

## 3. To Manage the inspections of FDA's new Authority

- Give the best of what is expected from your company
- To be prepared for stringent inspections

## 4. Building a Food safety Plan

- Thinking more about prevention
- HACCP- limited scope (Things we can measure)
- Migration from HACCP to HARPC
- HARPC-Risks we can control



# Collaboration between regulators & organizations for food safety capacity building

## 1. Proactive Approach

- Regulatory bodies need to approach stakeholders (Farmers, FBOs, WTOs, Private firms) before notifying regulations to know the concerns.
- Example- Pesticide MRL
- Pesticide in chilli- Ethion-10 ppm (Draft notification)



## 2. Statutory limits based on Data

- Limits should be set based on data worked upon by the regulatory body or the stakeholders.
- Example- Moisture limit in Atta
- If the regulatory body wants to reduce the moisture limit in Atta from 14% to 13%- The possibility of the same should be considered.



## 3. Transparency

- Transparency should be there between regulators and stakeholders in recording decisions and discussions



# Collaboration between regulators & organizations for food safety capacity building

## Risk Assessment and Management

### 1. Cost and Benefit Relationship

- The benefit of the new regulation with respect to cost should be considered.
- The effect on trade should be considered
- Plastic Ban in India- Plastic Bag which is below 50 microns is banned to be used by any manufacturer or vendor



### 2. Cause and Effect Relationship

- While setting up the limits the following things need to be considered
  - Food Safety Concern
  - Impact on Trade
  - Feasibility



### 3. Impact on International Trade

- Significance of the change in regulation on international trade should be considered.
- A particular change in regulation –How big the impact on international trade will be



# Collaboration between regulators & organizations for food safety capacity building

## Risk Assessment and Management

### 4. Field Level data

- Field Level data should be considered before releasing or amending an existing regulation.
- Data from Agricultural authority, National Institute of Nutrition, ICMR should be considered

### 5. Sufficient Time for Deliberation/discussion

- Enough time should be given for discussion between the regulatory body and the stakeholders.
- Specially Small scale industries need to be given time ( Say 1 to 2 years) for implementing the change.

### 6. Effect on environment

- The impact of a particular new regulation on the environment should also be considered



**THANK-YOU**