

# REGULATIONS ON PACKAGING AND LABELLING OF MILK AND MILK PRODUCTS

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# DEFINITIONS

- ▣ “Label” means any tag, brand, mark, pictorial or other descriptive matter, written, printed, stencilled, marked, embossed, graphic, perforated, stamped or impressed on or attached to container, cover, lid or crown of any food package and includes a product insert (FSSA, 2006)
- ▣ “Package” means a pre-packed box, bottle, casket, tin, barrel, case, pouch, receptacle, sack, bag, wrapper or such other things in which an article of food is packed (FSSA, 2006)

# DEFINITIONS

- ▣ “Prepackaged” or “Pre-packed food”, means food, which is placed in a package of any nature, in such a manner that the contents cannot be changed without tampering it and which is ready for sale to the consumer (FSSR, 2011)

# PACKAGING REGULATIONS

FSSR, 2011

- ▣ Packaging
  - General requirements
  - Specific requirements for milk and milk products
  
- ▣ Aspects dealt with:
  - Integrity of packages. E.g. packages not be rusty, chipped (enamelled) etc.
  - Certain packaging material (aluminum, plastic) to conform to relevant BIS standards
  - Condition for re-use of packages
  - Tamperproof sealing
  - Proper storage of packaged product

# LABELLING

## Purpose of label: Communication with consumer

- ❑ Product identity: Product name, manufacturer, lot no.
- ❑ General characteristics: Ingredients, nutritional information, food additives etc.
- ❑ Metrological: Weight etc.
- ❑ Safety: Best before/ expiry/ use by, allergen, Not for children etc.
- ❑ Informed choice facilitation
  - Claims: Free from cholesterol etc.
  - Religious values: Veg/Non-veg, halal
  - Organic
  - Others
    - Environmental aspects: Carbon footprint, water usage, tree felling etc.
    - Social aspects: Child labour
    - Animal welfare
    - Geographical indicators: E.g. Basmati rice
- ❑ Usage instructions
- ❑ Commercial information

TRANSITION FROM 'FRAUD PREVENTION' (1960s) TO 'CONSUMER INFORMATION' (1990s) AND 'DELIVERING HEALTH POLICY' (CURRENT)

# LABELLING REGULATIONS

FSSR, 2011 related to labelling

Main principle

Pre-packaged food shall not be described or presented on any label or in any labelling manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect



# LABELLING REGULATIONS

Label of pre-packaged food to carry following information

- ▣ Name of food
- ▣ List of ingredient
  - Ingredients solely from milk: Class 'Milk solids'
  - Ingredient of compound ingredient
  - Added water
  - % of ingredient emphasized
- ▣ Nutritional information
  - Energy
  - Protein, carbohydrate (sugar), fat
  - Nutrient for which claim is made
  - Trans fat (definition =?)
  - Saturated fat
  - food claimed to be enriched with nutrients shall give quantity of added nutrients



# LABELLING REGULATIONS

- ▣ Vegetarian and non-vegetarian symbol
- ▣ Food additives
  - Specific name or number with functional class title
  - Colour and/or flavour
- ▣ Name and complete address of manufacturer and manufacturing unit (importer, if applicable)
- ▣ License number
- ▣ Net quantity
- ▣ Lot/code/batch identification
- ▣ Date of manufacture or packing
- ▣ Best before and Use by date (with storage instructions)
- ▣ Country of origin of imported food
- ▣ Instructions for use

# LABELLING REGULATIONS

- ▣ Other requirements
  - Manner of declaration
  - Language (English or Hindi in Devnagri script, Regional)
- ▣ Specific requirements in relation milk and milk products
  - Type of milk (if not, then buffalo milk standards apply)
  - Infant milk substitute and infant food
  - Condensed milks or desiccated (dried) milks
  - UHT processed product
  - Presence of lecithin
  - Low fat paneer / chhana
  - Natamycin
  - Artificial sweeteners

# LABELLING REGULATIONS

## ▣ Restrictions

- Words implying recommendations by medical profession
- Imitations not be marked 'Pure'
- Advertisement which is misleading or contravening FSSR, 2011

## ▣ Exemptions

- Package surface area not more than 100 cm<sup>2</sup>: List of ingredient, batch no., nutritional information, instruction for use; but required on wholesale or multipiece package
- Package surface area less than 30 cm<sup>2</sup> : Date of manufacture or best before date or expiry date; but required on wholesale or multipiece package
- Food with shelf life not more than 7 days: Date of manufacture; but use by date is required
- Wholesale packages: List of ingredients, date of manufacturing/packing, best before, expiry date of irradiated food, and vegetarian/non-vegetarian logo

## ▣ Claims

- Trans fat free (<0.2 g/serving)
- Saturate fat free (0.1 g/100 g or ml)
- Health claims: Nutrition claims, Risk reduction claims defined

# DRAFT REGULATIONS

## Draft Regulation on Labelling (Claims): December 2012

- ▣ Existing provisions
- ▣ General Principles for making claims on pre-packaged foods
- ▣ Use of terms: Natural, Pure, Fresh, Premium, Traditional, original etc.
- ▣ Conditions for 'comparative' claims: 'High' or 'Low' or 'Reduced' or 'Increased' in particular nutrients
- ▣ Conditions for 'Source' of particular nutrient claim: E.g. Source of Calcium; includes claims for probiotics and prebiotics
- ▣ Conditions for 'Free' from particular nutrient claim: E.g. Free from trans fatty acids
- ▣ Conditions for 'No added' claims: E.g. No added salt
- ▣ Conditions for 'Disease risk reduction' claims
- ▣ Process for authorization of claims (Scientific substantiation and evidence necessary to support a claim)

# CODEX ALIMENTARIUS

- ❑ General Standard for the Labelling of Prepackaged Foods (Codex/Stan 1-1985)
- ❑ General Standard for the Use of Dairy Terms (Codex Stan 206-1999)-GSUDT
- ❑ General Standard for the Labelling of and Claims for Prepackaged Foods for Special Dietary Uses (Codex Stan 146-1985)
- ❑ Standard for the Labelling of and Claims for Foods for Special Medical Purposes (Codex Stan 180-1991)
- ❑ General Guidelines on Claims (CAC/GL 1-1979)
- ❑ Guidelines for Nutrition Labelling (CAC/GL 2-1985)
- ❑ Guidelines for the Use of Health and Nutrition Claims (CAC/GL 23-1997)
- ❑ General Standard for the Labelling of Food Additives when Sold as Such (Codex Stan 107-1981)
- ❑ Guidelines for the Production, Processing, Marketing and Labelling of Organically Produced Foods (CAC/GL 32-1999)
- ❑ Compilation of Codex Texts Relevant to the Labelling of Foods Derived from Modern Biotechnology (CAC/GL 76-2011)
- ❑ General Guidelines for the Use of the Terms 'Halal' (CAC/GL 24-1997)



# CODEX ALIMENTARIUS: GSUDT

- ▣ *Milk* is the normal mammary secretion of milking animals obtained from one or more milkings without either addition to it or extraction from it, intended for consumption as liquid milk or for further processing
- ▣ Only product complying with definition of milk can be called milk
- ▣ Milk with adjusted fat/protein content can be called milk if such adjustment is allowed in country of retail sale
- ▣ Modified milks can use the term 'milk' with clear description of the modification made

# CODEX ALIMENTARIUS: GSUDT

- ▣ *Dairy terms* means names, designations, symbols, pictorial or other devices which refer to or are suggestive, directly or indirectly, of milk or milk products
- ▣ Can be used as per commodity standards
- ▣ For composite milk products: Can be used provided clear description of characterizing ingredient is given
- ▣ For other (read non-dairy) foods: Cannot be used but may be used in the name of a product the exact nature of which is clear from traditional usage or when the name is clearly used to describe a characteristic quality of the non-milk product. E.g. Coconut milk in India; Soybean \_\_\_\_\_ (?)
- ▣ Substitutes of milk/milk product/composite milk product: Cannot be used



# DISCUSSIONS UNDER CODEX ALIMENTARIUS

- ▣ Date marking
  - E.g. 02/04/2014 = ?
  - All three elements or fewer
  - All in numeral or month in letter
  - Specific format: E.g. dd/mm/yyyy
  - Only best before/use by date or also date of manufacturing/date of packing
- ▣ Labelling of non-retail containers of food
- ▣ Conditions for 'Trans fatty acid free' claim
- ▣ Organic food labelling

# CONTROVERSIAL ISSUES

- ▣ Geographical indicators
- ▣ Environmental issues
- ▣ Social issues
- ▣ Animal welfare issues

# ISSUES NEEDING ATTENTION

## FSSAI

- ▣ Use of the dairy terms including use of the term 'milk'
- ▣ Labelling of non-retail containers
- ▣ Allergen labelling

## FSSAI plus other relevant agencies

- ▣ Approval system of 'probiotic' claim
- ▣ Approval system for 'organic' claim

**THANK YOU**