

# Food Regulations on Edible oil in India - Challenges and Way Forward

Dr Himanish Das, AVP & Head- QA, R&D & Compliance

# FSSAI's ENDEAVOUR - HIGHLY APPLAUDED

- ▶ EMERGENCE OF FSSAI - as umbrella regulations
- ▶ Concept of FOOD ADULTERATION to Focus on Standards and Regulations
- ▶ HARMONISATIONS WITH GLOBAL STANDARDS
- ▶ FOOD FORTIFICATIONS REGULATIONS
- ▶ FOOD ADDITIVES AND STANDARDS REGULATIONS
- ▶ HEALTH SUPPLEMENTS AND NUTRACEUTICAL etc REGULATIONS
- ▶ FSSAI AS AN ORGANISATION- CAPABILITY AND INFRASTRUCTURE BUILDING

## ....AREAS OF IMPROVEMENTS

- ▶ FREQUENT CHANGES ON REGULATIONS - Advt and claims Reg, Blended Oil Reg
- ▶ IMPROVEMENT ON FOOD INDUSTRY AS A PARTNER
- ▶ MORE PRACTICAL APPROACH
- ▶ CONSTRUCTIVE FEEDBACK FROM INDUSTRY WITH DUE CARE
- ▶ TRAINING AND UPGRADATION OF FSO AND PUBLIC ANALYST ABOUT REGULATIONS
- ▶ MORE FOCUS ON FOOD SAFETY, ADULTERATION THAN MISLABELLING/MISBRANDING

## Frequent changes of regulations & ambiguity in clauses

- ❑ Hurriedly brings regulations for which industries faces huge problems.
- ❑ Certain cases , feedback given by industry at draft stage are not considered before final notification.

The comparison table (year wise) for font size (mm) of blended edible oil:

	2019		2021	
	BLENDED EDIBLE VEGETABLE OIL	Name and Nature of edible vegetable oil.....% by weight	MULTI-SOURCED EDIBLE VEGETABLE OIL	Name and Nature of edible vegetable oil.....% by weight
Less than 1 litre	3	2	5	3
1 to 5 Litre	4	2.5	5	3
More than 5 litre	10	3	10	Not clear

- ❑ 4 times of changes in last five years. Involves cost and time and effort to comply. Laminate wastage. Example: One artwork needs 8 cylinder change costing 1.6 Lakh per SKUs.
- ❑ Ambiguity on font size of **Name and Nature of edible vegetable oil.....% by** for 5 litre and above.
- ❑ 8<sup>th</sup> March,2021, it is “Multi Source Edible Vegetable Oil” & previously it was “Multi Sourced Edible Vegetable oil”. Spelling mistake?

# Frequent changes of regulations & ambiguity in clauses

- ❑ FSS (Advertisement and Claims) Reg 2018- ambiguity on several points needs overhaul and changes.

Definition of Health claims -Nutrient Function Claims, other function claims

- ❑ FSS (Advertisement and Claims) AMENDMENT Reg 2019- Certain ambiguity cleared and bring new ambiguity about its enforcement.
- ❑ If it was so urgent in 2018, why there is no final notification so far.

## FSS (Labelling & Display) Reg 2020, 17 Nov 20

### ▶ CHALLENGES:

Expiry/Use by date in DD/MM/YY or JAN 22 - to be coded while doing batch coding during packing

- ❑ Printers are not smart to automatically calculate such date once mfg date is inserted.
- ❑ Manual insertion for each product for everyday- Chances of error.
- ❑ Chances of partial ink erase- will cause havoc.
- ❑ It will be the 4<sup>th</sup> item which to be coded- serious space crunch on pack.
- ❑ Limitations in printing machines for no. of characters and lines. Acute problem for coding on pet bottle.

### ▶ PROPOSAL:

- ▶ "BEST BEFORE XXXX MONTHS.....MANUFACTURE" in existing format for long shelf life products.  
Preprinted and no chances of manual error or ink erase.
- ▶ Expiry or Use by date in DD/MM/YY can be implemented for shorter shelf life products

### ▶ REASON:

- ▶ No additional benefit over existing regulation.
- ▶ As FFA and PV are 2 chemical parameters are for safety determination for oils, Best before is good enough.

## FSS (Labelling & Display) Reg 2020, 17 Nov 20

### ► CHALLENGES:

Font size reqt of Multi-sourced Edible Vegetable Oil- 10 mm for 5 lit and above pack- unrealistic

Space crunch on pack label as front panel needs to declare many items such as:

- Agmark logo with grade and Multisourced Edible veg Oil
- Name of oil- MULTISOURCED EDIBLE VEGETABLE OIL ...in 10 mm size
- Blend composition- REFINED SOYABEAN OIL- 50%, REFINED SUNFLOWER OIL-47%, REFINED FLAXSEED OIL-3%.
- NOT TO BE SOLD LOOSE
- Brand name: xyz
- Marketing communication: few words product features/benefits
- Veg Logo & Fortification logo

Clarity not there for Font size of % composition of oil- for 5 lit and above.

### ► PROPOSAL:

- Font size of product name and composition- 3- 4 mm is sufficient.
- NOT TO BE SOLD LOOSE.... Can be placed on back panel

### ► REASON:

- Will give clarity to consumer about name of oil, composition and product features/benefits.
- 10 mm height is illogically unrealistic.

## FSS (Labelling & Display) Reg 2020, 17 Nov 20

### ▶ CHALLENGES:

1. Nutrient declaration must for Sprinkler masala/direct consumption masala whereas other spices and seasonings are exempted.
2. Declaration for sodium can't be must for some products like oil.

### ▶ PROPOSAL:

- ▶ Nutrient declaration for Sprinkler- to be removed.
- ▶ Sodium for oil to be removed

### ▶ REASON:

- ▶ Has no nutritional significance for sprinkler over other spices.
- ▶ Sodium in oil has no significance



# Til oil addition in Vegetable fat-to detect adulteration of ghee

## RELEVANT CLAUSE :

Sub-reg 2.2.2 (Interesterified vegetable fat), 2.2.5(Margarine & fat spread), 2.2.6 (1 & 2) (Vanaspati) & bakery shortening) of reg 2.2 of FSS (Food Products Standards and Food Additives) Reg, 2011.

## PROPOSAL :

- Removal of Sesame oil (Til oil) addition from Vanaspati & other vegetable fat.
- For inter-esterified fat, til oil dose is 5% whereas for others it is to give 2 BT colour.

## REASON & WAY FORWARD:

1. Non availability of good quality Til oil throughout the year.
2. The cost of Til oil addition to Vanaspati & vegetable fats to comply is approx. Rs.750 per MT.
3. Fatty Acid profile of ghee (21<sup>st</sup> July,2020) is long pending for finalisation. It is high time to gazette the notification.

## ISSUE :

Edible refined oils, Vanaspati, bakery shortening, margarines, vegetable fat spreads and mixed fat spreads may only contain 3 per cent or less trans fats by January 2021 and 2 per cent or less trans fats by January 2022.

### ▶ REGULATION :

F. No. 1-116/Scientific Committee/Notif./2010-FSSAI , published on 29<sup>th</sup> December,2020.

### ▶ PROPOSAL :

Trans fat of edible refined oil can be not more than 2% but for Vanaspati, bakery shortening, margarines, vegetable fat spreads and mixed fat spreads , it should be not more than 3%.

### ▶ REASON & WAY FORWARD:

1. As per WHO daily intake of TFA is 1% of total energy. So 6.2% TFA in Vanaspati is safe. Refined Oils always contains less amount of trans fat than hydrogenated vegetable oils.
2. TFA can be 3 g per 100 g/ml.

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