

ISSUES/ OPPORTUNITIES IN FOOD SAFETY AND STANDARDS REGULATIONS

Prakash Selvaraj

Regulatory Affairs Department

ITC LIMITED – FOODS BUSINESS DIVISION

Key Topics



- **Limitation of Trans Fat Free in Processed Foods**
- **Tolerance Limit of Micro Nutrients in Fortified Foods**
- **Requirements stipulated for cereal products**
 - ❖ Moisture Content
 - ❖ Alcoholic Acidity
- **Food Additives**
 - ❖ Steviol Glycosides in Bakery Products & Chocolates
 - ❖ Sorbates in Bakery Products
 - ❖ Polyols in coffee/ tea substitutes
 - ❖ Tocopherols in water based flavoured drinks
- **Food Safety Auditing**
- **Processing aids**
- **Gazette Advertising and claims regulations**
- **Draft Labelling and Display regulations**
- **Contaminants, Toxins and Residues Regulations**
- **Spread of malicious/ fake news or rumors**

Limitation of Trans Fat Free in Processed Foods



Food Products in which edible oils and fats are used as an ingredient **the content of trans fat, other than trans-fat naturally occurring in fat of animal origin (e.g. milk fat etc.),** shall not contain trans fatty acids more than 2% by weight of the total oils/fats present in the product, on and from 1st January, 2022.”



- Trans fatty acids (TFA) **occur naturally in dairy products and fats from ruminants** as a result of bacterial bio hydrogenation. In addition, TFA are formed industrially by partial hydrogenation of unsaturated fatty acids from vegetable and marine oils.
- **The proportion of industrially produced trans fats in diets are usually much greater than ruminant trans fat.**
Ref: Eliminating the consumption of trans fats in South-East Asia – An implementation brief, WHO SEARO.
- **Industrially produced trans fatty acids (IP-TFA) can represent up to 60 g per 100 g fat in certain food samples, whereas the level of ruminant trans fatty acids (R-TFA) is only up to 6 g per 100 g fat.**
- **WHO:** Elimination of industrially-produced Trans fatty acids and **use the REPLACE action package to eliminate industrially-produced trans-fatty acids from the food supply by 2023.**
- Globally, the limitation of trans fat content is regulated only on industrially produced trans fatty acids and r-TFAs are excluded from the regulation in various countries such as **Denmark, Austria, Iceland, Hungary, Norway, European Union, Singapore and South Africa.**
- **WHO PAHO:** Eliminate industrially produced trans-fats to reduce NCDs and protect the Region’s health.
- **Industrially produced trans-fatty acids (TFAs) have been conclusively linked to the development of cardiovascular disease, the leading cause of death.**

Tolerance Limit of Micro Nutrients in Fortified Foods



Any manufacturer who fortifies any food shall ensure that the ~~declared value of~~ **level of added** micronutrients ~~on label of~~ **in** such fortified food shall fall within the levels (minimum-maximum) specified in Schedule-I during the declared shelf life of the products.

Provided that tolerance of ~~+/-~~ **(-)** 10 per cent of the declared value of micronutrients on the label may be allowed for the purposes of compliance and analysis at any point in time within declared shelf life of the product.”

Provided, that no regulatory action will be based on a determination of a nutrient value that falls below this level by a factor less than the variability generally recognized for the analytical method used in that food at the level involved.



FORTIFIED
SAMPOORNA POSHAN
SWASTH JEEVAN

- Micronutrient requirements given under regulation relates to level of fortification and not the actual amount of nutrient present in the fortified food.
- Also regulations states about compliance with standards on micronutrient level in fortified food and not about labelling compliance i.e.: declared value of micronutrient on label (NIP).
- Degradation of added micro nutrients in food are inevitable due to heat sensitiveness. To compensate the loss of micro nutrients during processing and shelf life of the product, FBO add appropriate overages around 10% to 25% to meet targeted micronutrient level and for the purposes of compliance and analysis at any point in time within declared shelf life of the product.
- **Example:** Fortified atta standard mandate to add between 2.8 mg to 4.25 mg iron as nutrient per 100 g of atta, in addition, atta as such will contribute around 4.10 ± 0.67 mg inherent iron per 100 g (**Source NIN 2017**) with variation around +/- 16.3%.

Moisture Content in Cereal Products

Food Product Standard	Current/Previous Regulation	Amendment Regulation	Industry Proposal
2.4.2.(1) Refined wheat flour (Maida)	14%	13%	14%
2.4.18.(1) Sorghum flour	11%	11%	13%
2.4.6.(4) Sorghum grains	16%	13%	16%
2.4.6.(23) Pearl millet grains	16%	13%	16%
2.4.6.(20) Ragi grains	16%	12%	16%

- ❑ Moisture content in grains is entirely dependent upon the good agricultural practices, maturity of the grains, climatic conditions, farming practices including harvesting period, post-harvest handling & storage of the grains, etc.
- ❑ Decreasing the moisture requirement will force FBOs to do selective procurement of grains from farmers or Mandi (who are equipped with modern technologies) and this will lead to economy loss to Indian farmers.
- ❑ Cereal grains are generally used as an ingredient in various food products such as bakery wares, breakfast cereals, ready to eat products, ready to cook products etc. In India, the food preferences vary every five meters. With the diversified regional preferences, it is very hard for FBOs to satisfy their requirements.

Alcoholic Acidity in Cereal Products



Food Product Standard	Current/Previous Regulation	Amendment Regulation	Industry Proposal
2.4.18.(1) Sorghum flour	No Requirement	Not more than 0.15% expressed as H ₂ SO ₄ , % on dry weight basis	Option 1 – Omit the parameter (or) Option 2 – Revision of limit as 0.7%
2.4.17.(1) Pearl millet flour	No Requirement	Not more than 0.15% expressed as H ₂ SO ₄ , % on dry weight basis	Option 1 – Omit the parameter (or) Option 2 – Revision of limit as 1%

- ❑ No requisite historical data available with FBOs to arrive at particular limits for this parameter. In fact, globally there is no requirements of compliance to ‘Alcoholic acidity’ as is being stipulated in this standard (CODEX and EAST AFRICA).
- ❑ Most of the products available in the market will not be able to meet the FSSAI proposed specification (of NMT 0.15%) till shelf life, which will discourage FBOs to exit from this millet commercialization fearing non-compliance. This will not only place FBOs at undue disadvantage but also deprive consumers on availability of such healthy food and also subject farmers to unfair trade price.
- ❑ FBOs adheres FSS (Contaminants, Toxins and residues) Regulations strictly which mandates all food products to comply specified requirements throughout the shelf life of the product, in particular Aflatoxin limit of Maximum 15 ppb for cereals and cereal products and product specify moisture requirements under food product standards regulations.

FOOD ADDITIVES

Proposal for use of Steviol Glycosides in Bakery Products & Chocolates



Food Category system	Recommended maximum level	NOTE
7.0 – Bakery Wares	550 mg/kg	26 – As steviol equivalents
5.1.3 – Cocoa and chocolate products	1000 mg/kg	26 – As steviol equivalents

- ❑ The importance and the need for **sugar free and/or low calorie products** has been on the rise for quite some time now.
- ❑ The **measures and initiatives undertaken by FSSAI** viz., Eat Right India Movement, SNF @ Workplace etc. are commendable and have been able to create enough awareness among the public on the need for a low sugar or sugar free food consumption.
- ❑ The proposed change for inclusion of stevia would allow manufacturers to create more **innovative products with reduced sugar and comparable palatability**.
- ❑ In line with **reformulation strategy to reduce sugar intake**, steviol glycosides shall be considered as there is **no advisory effects** associated and declaration to that effect.

Stevia has **unique advantages**:

- ❖ **Non-caloric**
- ❖ **Non-fermentable**
- ❖ **Do not cause dental caries**
- ❖ **Increase the palatability**
- ❖ **Improve flavors and smells**
- ❖ **Heat-stable up to 200°C & Acid-stable**

Global Regulatory Status: Stevia is allowed for use in various countries Canada, USA, Australia, New Zealand, European Union, Singapore and Malaysia.

FOOD ADDITIVES

Proposal for revision in level of SORBATES in Bakery Products

Food Category system	Recommended maximum level	NOTE
7.0 – Bakery Wares	1000 mg/kg	42 – As Sorbic Acid <u>New Note: 2000 ppm for products with water activity of the product is more than 0.65</u>

- The proposal is made in alignment with **European Union (Regulation EC 1333/2008)**.
- ADI established by EFSA: **11 mg/kg bw/day**.
- As per opinion from Scientific Panel of EFSA: Basis the toxicology data and dietary assessments carried out, at the proposed level it does not pose any health harms in individuals belonging to different age groups.

FSSAI's Restriction for use of preservative in combination:

- Preservatives may be used in combination with one or more alternatives, provided the **quantity of each preservative so used does not exceed such number of parts** out of those specified for that preservative on the basis of the proportion in which such preservatives are combined.

FOOD ADDITIVES

Proposal for use of POLYOLS in Food Category 14.1.5

(Coffee, Coffee substitutes, tea, herbal infusions, and other hot cereal beverages, excluding cocoa)



Food Additives	Recommended maximum level	NOTE
Sorbitol (INS 420(i)), Sorbitol Syrup (INS 420(ii)), Mannitol (INS 421), Isomalt (INS 953), Maltitol (INS 965(i)), Maltitol Syrup (INS 965(ii)), Lactitol (INS 966), Xylitol (INS 967), Erythritol (INS 968)	GMP	Note 160 – For use in ready-to-drink products and pre-mixes for ready-to-drink products only

- ❑ Polyols are a group of **reduced-calorie, low-digestible, low-glycaemic carbohydrates**.
- ❑ Polyols are in a unique position to assist with reduced-sugar or sugar-free reformulations since they **can reduce calories and complement sugar's functionality** in many food and beverage applications.
- ❑ Polyols are considered **bulk sweeteners** because they can be used volume-for volume in place of sucrose.

❑ JECFA ADI : Not Specified.

- ❖ ADI 'not specified' refer to a food substance of very low toxicity.
- ❖ Does not represent a hazard to health in the opinion of the Committee.

- ❑ Global Regulatory status: **POLYOLS are allowed for use in various countries Canada, Australia, New Zealand, Singapore and Malaysia.**

FOOD ADDITIVES

Proposal for use of TOCOPHEROLS in Food Category 14.1.4

(Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks)



Food Category system	Food Additives	Recommended maximum level	NOTE
14.1.4	TOCOPHEROLS	200 mg/kg	Note 434 – Carry-over from use as an antioxidant in flavours, colours, juice ingredients and nutrient preparations.

CODEX ALIMENTARIUS

- ❖ The additive (TOCOPHEROLS) along with the note (434) have been adopted in CODEX since 2018. The proposal is made in alignment with CODEX General Standards for Food Additives (**CODEX STAN 192-2005; Revised in 2018**).

EUROPEAN UNION

- ❖ The additives (Tocopherol-rich extract **E306**, Tocopherol-rich extract **E307**, Gamma-tocopherol **E308**, Delta-tocopherol **E309**) are included under **GROUP-I** additives with a maximum level as **quantum satis (GMP)**.
- ❖ **GROUP-I** additives (including Tocopherols) are permitted for use in flavoured drinks under Food Category 14.1.4.

FSANZ

- ❖ The additives (Tocopherol, d-alpha-, concentrate **INS 307**, Synthetic gamma-tocopherol **INS 308**, and Synthetic delta-tocopherol **INS 309**) are included with a maximum level as **GMP** for the **preparation of food additives**.

Food Safety Auditing



- FSSAI has granted Provisional Recognition as Food Safety Auditing Agencies under draft Food Safety and Standards (Food Safety Auditing) Regulations, 2017 for **24 auditing agencies**.
- Category/type of food businesses that will be subject to mandatory audits are:
 - **FBOs with central licensing under Dairy, Eggs, Meat, Fish, Special Foods & and Prepared foods.**
- Initial Phase **only for manufacturers and processing units** of aforementioned categories.
- First mandatory audit to be completed by **31st December 2019**.
- Frequency of further audits based on audit score.
 - ❖ One in 12 months : For score between 81 – 100.
 - ❖ Once in 9 months : For score between 51 – 80.
 - ❖ Once in 6 months : For score below 50.

Challenges/ Ambiguities:

✓ Selection of auditing agency:

- ❑ An agency or its auditor should not have provided any training, guidance, food safety certification or consultancy or **not carried out internal audits to the food business or its parent or subsidiary for last two years**.

✓ Mandatory auditing of an **integrated facility** wherein both low risk (e.g. Breakfast cereals, Cereal based desserts) and high risk food categories (e.g.: Prepared foods) are operated:

- ❑ Will mandatory audit to be done **only for manufacturing operations of high risk food categories** in an integrated facility or the audit to be done for **entire manufacturing operations** of an integrated facility (including low risk food category)? In this case, how to decide **audit frequency** of the integrated facility?

Regulations on Processing Aids

Draft FSSAI Notification: Mandatory labelling of processing aids
Global Regulations: No Requirement to label except allergic ingredients

Other industrially used processing aids missed in FSSAI draft

- **Table 4 - Lubricants, Release and Antistick agents:**

- Talc in confectionery & gums,
- Cocoa powder dusting in chocolates,
- Ca/Mg/Na salts of stearic acid in all foods.

- **Table 1 - Antifoaming agents:**

- Poly alkylene glycols and esters in oils & oil fried foods

- **Table 3 - Filtration aids:**

- Extension of use of Diatomaceous earth to all foods;
- Magnesium silicate in oils & oil fried foods.

- **Table 7 - Bleaching agents:**

- Lime (CaO) in spices and Benz alkonium chloride in eggs

- **Table 12 - Generally permitted PA:**

- Salt in paneer,
- Carnauba wax in confectionery & gums,
- Raising agents in flour mixes,
- Calcium chloride in extruded foods,
- TBHQ in oils & oil fried foods,
- Lecithin & PGPR in chocolates,
- Citric acid in invert sugar,
- Nitrogen as packaging gas,
- Extension of use of silica as lubricant, release and Antistick agents.

FSS (Advertising and Claims) Regulations



Key Challenges

- Claims should not encourage or condone excess consumption of a particular food.
- Claims shall specify the number of servings of the food per day for the claimed benefit (**for DRR Claims only**)
- For nutrient content claim meeting the criteria per 100g, issues of smaller SKUs or defining serving sizes.
- A disclaimer ≥ 3 mm/ ≥ 1.5 mm at the appropriate place on label where adjectives like "natural", "fresh" etc. are used as brand name or trademark. "This is only a brand name or trade mark and does not represent its true nature."
- No advertisements and/or claims that undermines the products of any other manufacturer for the purpose of promoting their products or influencing consumer behavior.
- No health claims shall be made for foods that contain nutrients or constituents in amounts that increase the risk of disease or an adverse health related condition.
- If the advertisement is found to be in violation of these regulations, the concerned FBO/advertiser shall stop it immediately and to issue corrective advertisement(s) within thirty days through the same medium.

Draft FSS (Labelling & Display) Regulations

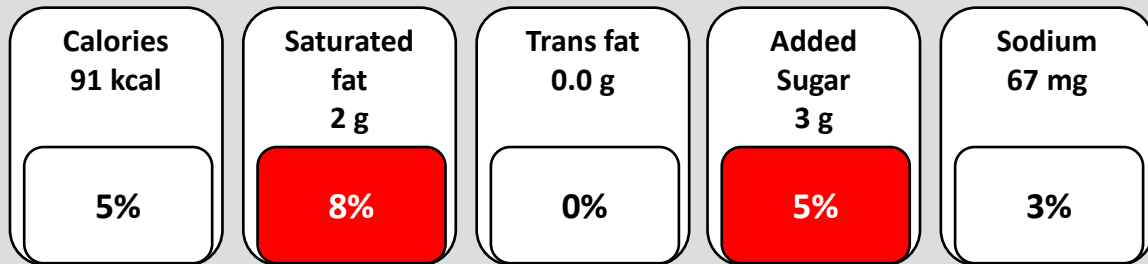
New Regulation: Red Colour Coded HFSS Labelling



“high fat, sugar, salt (HFSS) food” means a processed food product which has high levels of saturated fat or trans fat or added sugar or sodium.

Added sugar less than 10 % of total energy; Trans fat less than 1 % of total energy; Saturated fat (2.6 g in 100 g); Sodium (250 mg in 100 g)

Illustration: Typical example of a Biscuit
Serve Size = 18 g (2 Biscuits)



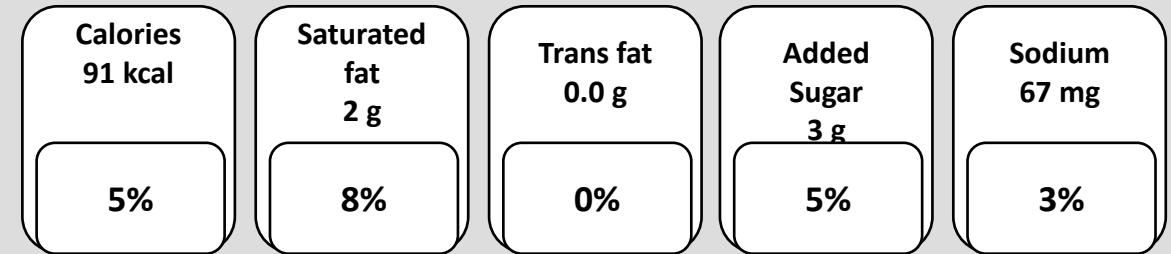
Calculated based on reference daily energy intake value of 2000 kcal;

- ❖ Any beverage provides energy less than 80 Kcal/ per serve is exempted from colour coding.
- ❖ HFSS foods **shall not be advertised to children** in any form.

INDUSTRY PROPOSAL

- ❖ FBOs proposed to delete the definition of HFSS.
- ❖ FBOs proposed to implement monochrome GDA as first step towards Front-Of-Pack Nutrient Labelling (FOP NL).

Illustration: Typical example of a Biscuit
Serve Size = 18 g (2 Biscuits)



Calculated based on reference daily energy intake value of 2000 kcal;

- ❖ Any **food/beverage** provides energy less than **100 Kcal/ per serve** is exempted from colour coding or any other nutrient profiling model.
- ❖ Advertisement to children to be removed as the definition of HFSS foods is proposed for removal.

WAY FORWARD

Compilation of nutritional data from market available products → Reformulation strategy → Determination of thresholds basis extent of reformulation possible → FOP NL

Draft FSS (Labelling & Display) Regulations

Height of Numeral & Letters



Existing Regulation 2.3.3 FSSR (P&L) 2011

The height of **any numeral** required under these regulations, on the principal display panel shall not be less than (**basis net weight of the product**)

- 1 mm (< 50 g/ml);
- 2 mm (50 – 200 g/ml);
- 4 mm (200 g/ml – 1 kg/L);
- 6 mm (> 1 kg/L)

Height of Letters – 1 mm (except mandatory declarations at 3 mm)

Draft Regulation 5 (3) – FSSR (L&D) 2019:

The height of **any numeral and LETTER** required under these regulations, on the principal display panel shall not be less than (**basis PDP area**)

- 1 mm (PDP Area < 100 sq.cm);
- 2 mm (PDP Area 100 – 500 sq. cm);
- 4 mm (PDP Area 500 – 2500 sq. cm);
- 6 mm (PDP Area > 2500 sq. cm)

Rectangular Pack – 40% of Area of Largest side

Cylindrical/ Nearly Cylindrical Pack – 40% of product of height & circumference

Other shaped pack – 20% of total surface area

INDUSTRY PROPOSAL

FBOs proposed to revise the height determining criteria as follows:

- 1 mm (PDP Area < 200 sq.cm);
- 1.5 mm (PDP Area 200 – 500 sq. cm);
- 2 mm (PDP Area > 500 sq. cm)

Rectangular Pack – 40% of Area of Largest side

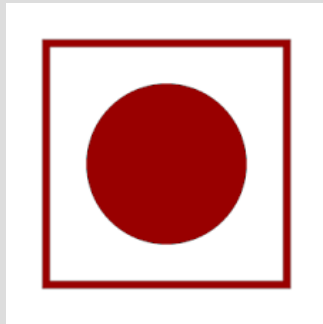
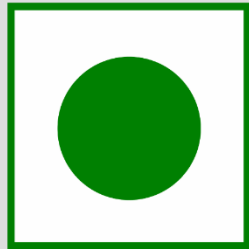
Cylindrical/ Nearly Cylindrical Pack – 20% of product of height & circumference

Other shaped pack – 20% of total surface area

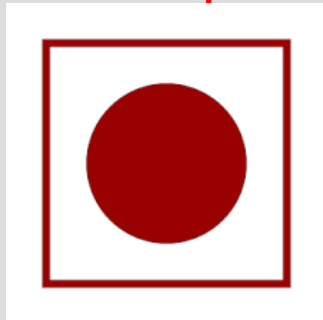
RATIONALE & CHALLENGES

Draft FSS (Labelling & Display) Regulations Declaration regarding Veg or Non veg

Existing Regulation 2.2.2.(4)– FSSR (P&L) 2011:
Vegetarian Logo – **Green Dot and Square Outline**
Non-Vegetarian Logo – **Brown Dot and Square Outline**

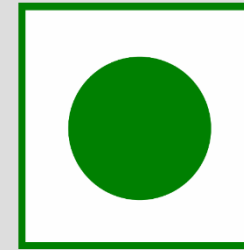


Draft Regulation 4.2.(4).(b)– FSSR (L&D) 2019:
Vegetarian Logo – **Green Triangle and Square Outline**
Non-Vegetarian Logo – **Brown Dot and Square Outline**



INDUSTRY PROPOSAL:

Vegetarian Logo – **Green Dot and Square Outline**
Non-Vegetarian Logo – **Brown Triangle and Square Outline**



Rationale:

- Green Dot & Square is one of the widely and easily recognized symbol for vegetarian foods.
- Nearly **70% - 80% of packaged foods available in Indian market are vegetarian.**

(Data Source: Mintel; Products Evaluated – 119799).

- Changing the Non-Veg symbol as Brown Triangle and Square will address the **issue of colour blindness** as highlighted by Food Authority.

Draft FSS (Labelling & Display) Regulations Nutritional Information



INDUSTRY PROPOSAL

- FBOs proposal is to retain the existing option of 100 g or 100 ml or per serve.
- Per pack is also added as an option for the case of single consumption pack.
- FBOs shall be given option to choose as per their product construct, claims, target group etc.
- The per serve percentage contribution shall be considered as Front-of-Pack information of monochrome GDA.

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

BISCUITS	
Nutritional Information (Per 100 g)	
Energy (kcal)	473
Protein (g)	7.5
Carbohydrate (g)	72.8
Of which Sugar (g)	31.7
Fat (g)	16.9
Trans fat (g)	0.1
Saturated fat (g)	9.9

Draft Regulation 4.2.(3).(b)– FSSR (L&D) 2019:
Nutritional facts **per 100g or 100ml of the product and per serve percentage (%) contribution to RDA**

BISCUITS			
Nutritional Information	Per 100 g	Per Serve	%RDA
			Contribution Per Serve
Energy (kcal)	473	95	5
Protein (g)	7.5	1.5	-
Carbohydrate (g)	72.8	14.6	-
Sugars (g)	31.7	6.3	-
Added Sugar (g)	28.0	5.6	11
Total fat (g)	16.9	3.4	5
Trans fat (g)	0.1	0.0	1
Saturated fat (g)	9.9	2.0	9
Cholesterol (mg)	0.0	0.0	-
Sodium (mg)	250.0	50.0	3
One Serving = 20 g.			
Number of servings in the Package = 5 (for a 100 g pack)			

Draft FSS (Labelling & Display) Regulations Date Marking



Existing Regulation 2.2.2. (10)– FSSR (P&L) 2011:
BEST BEFORE DECLARATION

BEST BEFORE SIX MONTHS FROM PACKAGING

BEST BEFORE SIX MONTHS FROM MANUFACTURE

BEST BEFORE: 31/12/2019

Draft 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)

Expression “Best before” may also be used as optional or additional information.

“Date of manufacture or packaging” and “Expiry /Use by” shall be grouped together and given at one place.

INDUSTRY PROPOSAL

- FBOs propose to **retain the existing FSS (Packaging and Labelling) Regulations.**
- “**Expiry/ Use by date**” denotes the time after which food becomes “**unsafe**” for consumption and “**best before**” connotes the time period after which the **quality parameters may be at variance or diminished but food is not unsafe.** Thus it means providing “best before” information on label gives **safety margin** to the consumer which is better practice than the putting expiry date on the food labels. In fact, in common parlance manufacturers have regular practices to remove the product from the market after the best before date.
- The formats has become a common practice in the industry globally, any movement away from such provision would generate significant waste and loss to industries.

Draft FSS (Labelling & Display) Regulations

New Regulation: Labelling of non-retail container



Existing Regulation – No Regulation

Draft Regulation (9) of FSSR (L&D) 2019

Mandatory information either **on the container or on the label** attached thereto:

- Name of the food;
- Net Quantity;
- FSSAI Logo and License number;
- Date marking;
- Lot No.

Information in the **accompanying documents** (if not in label):

- List of ingredient along with their source as Veg or Non-Veg
- Nutritional information
- List of food additives
- Name and address of the manufacturer or packer (including country of origin for imported packages)

Every package meant for non- retail sale shall bear a statement **“NOT FOR RETAIL SALE”**.

INDUSTRY PROPOSAL

Mandatory information for non-retail container (**except wholesale packages**) either **on the container or on the label** attached thereto:

- Name of the food;
- Net Quantity;
- Lot No.

Information in the **accompanying documents** (if not in label of non-retail container):

- List of ingredient (including food additives)
- Name and address of the manufacturer or packer (including country of origin for imported packages)

Mandatory information for **wholesale packages (as per Legal Metrology)**:

- Name of the food;
- Net Quantity/ Contents;
- Name and address of the manufacturer.

Every package meant for non- retail sale shall bear a statement **“NOT FOR RETAIL SALE”**.

Contaminants, Toxins and Residues Regulations



- **Pesticide Residues:**

- Tolerance limit of 0.01 mg/kg shall apply in cases of pesticides for which MRL have not been fixed.
- It is not very clearly mentioned in the regulation that the tolerance limit of 0.01mg/kg is applicable only to the 213 residues listed under Clause 2.3.1 (3) of FSSR (Contaminants, Toxins & Residues) or to all the 939 residues defined under Insecticides Act.

- **Aflatoxin Limit:**

- FSSAI Draft Notification: For Spices, Total Aflatoxin 30 ppb and Aflatoxin B1 15 ppb.
- Indian spices at raw stage have Aflatoxin B1 limit ranges between 20 ppb to 30 ppb. And also it is to be noted that the contribution of Aflatoxin B1 in total Aflatoxin will be around 90%. While the existing requirement of total Aflatoxin is Maximum 30 ppb, Aflatoxin B1 itself will contribute around 27 ppb in Indian spices.

Spread of malicious/ fake news or rumors

Fake news is an existential crisis for social media



- First **ascertain the scientific facts** of Malicious Videos and News.
- Reach out to the affected person or organization/**avoid bulk messaging**.
- Avoid/ **Control Spread of malicious/ fake news or rumors**.
- Judicious use of social platform is a key responsibility.
- Address the issue at the very entry point.
- Refer regulations stipulated under **FSS Act to ascertain the facts**.
- FSSAI releases technical notes: **GET FOOD FACTS RIGHT**.
- Additionally it may **PUSH viruses** to your communication system (because its fast reach/speed and number of customer/Bulk messaging).
- **Like jacking** is the act of tricking users to post a Facebook status update for a certain site without the user's prior knowledge or intent.

THANK YOU

Draft FSS (Labelling & Display) Regulations

Height of Numeral & Letters

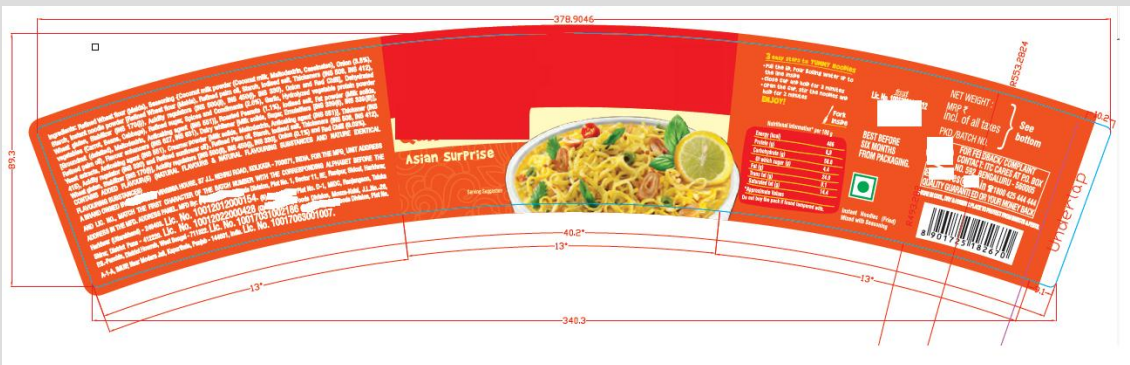
Type of package	Nearly Cylindrical
Net Weight	70 g
PDP Area	40% x Height x Circumference
Height = 6.8 cm; Diameter = 20 cm; Calculation: 40% x 6.8 x (3.14 x 20) = 170 sq.cm	

Particulars	Existing Pack	Modified Pack
Text (FSSR)	1 mm	2 mm
Numeral (FSSR)	2 mm	2 mm
Text & Numeral (LM)	2.5 mm	2.5 mm



Existing Pack

Modified Pack



Information not accommodated within a pack.

CHALLENGES:

- Current mandated information itself is not accommodated within pack.
- Further new information as detailed below is yet to be introduced in the pack:
 - Nutritional information table with new inclusion of “Cholesterol, Added Sugar, Sodium”.
 - Front-of-pack nutrition labelling.
 - Allergen Information.

