

Indian Pre-Packaged Food Labelling Regulations Vs Foreign Regulations- A Comparative Study With Special Reference to USA & UK

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Abstract- Indian food industry has played an indispensable part in Indian economy. With the advent of transportation, this sector has shown drastic development. Its scope is not limited to the country alone but has crossed the borders. So a number of regulations were framed to match Indian food labelling standards with international standards. With time various laws were introduced in the number of states to keep a check on the anti social elements. Purity, freshness and health seem to be compromised and adulteration of food stuffs became widespread. For the onslaught of food adulteration, countless Government ministries issued separate orders at different points of time to meet the changing environment and rapid changing lifestyle of the people. Thus history of Indian pre-packaged food labelling has crossed a number of stages. An effort has been made to depict those stages through this study and compare it with the food labelling regulations of US and UK to comprehend its efficiency.

Key Words: Adulteration, Manusamriti, Arthasastra, FSSA, FSSAI, Labelling, Packaging

INTRODUCTION

Pre-packaged food industry is crossing all horizons and is being preferred, these days, in comparison to loose food material available in the market. The reason underlying is not always better quality but the credit goes to the Food labels which when attached to the pre- packaged food serves the basic purpose of information of what exactly we're putting in our mouths. They actually guide us what to intake and what to avoid, the quality of the food we are having, the details about the manufacturers who are actually behind the making and packing of these products. These food labels influence our decision making as it informs us about the nutritional values as to how much exactly our daily fat intake is and how much we can sacrifice if we eat or avoid a particular product (Viviana Viola, G.C., et al, 2016).

The Food labels were not so popular in earlier times. With the passage of time, people started realising their importance. Actually these food labels had gone through various phases of historical development. If we peep into history, most of the food was produced locally and consumed locally, nullifying the usage of food labels and hence their regulation (Moore, M. 2001). It was in the nineteenth century that industrialization of food production took place making consumers more dependent upon food labels as a vital factor in decision making while purchasing. With the advent of these food labels, a need was felt to regulate the food industry. To begin with, these food regulations took the shape of regulatory remarks, which slowly and with time, advanced in the form of adulteration laws and levy of taxes and duties to cope up with the problem of misbranding. In the early twentieth century anti-misbranding statutes were passed. These statutes highlighted the need for more comprehensive labelling requirements. Earlier labelling was confined to barely minimum such as the name of the food, its weight and the address of the manufacturer. However, as consumers became more aware and responsive, food labels took a huge leap with detailed information and strict regulations fulfilling nutritional health disclosures and keeping pace with long term diseases and allergens to satisfy one and all.

Although these food labels are heavily regulated and there are an array of exceptions, nuances and stipulations that govern them but nonetheless, consumer's interest groups will continue to demand more transparency and visibility from manufacturers (Madhvapaty, H. & Gupta,

A.D. 2015). One method isn't enough for all the consumers to digest: it all depends on where you grew up and what you're used to. So, these regulations vary from country to country depending upon how informative and demanding their consumers are (Birol, E. 2009). As such it is quite impossible to have one label for a packaged food that is legally compliant in all the markets. These variances between cultures include the language, word choice, awareness level of the consumers, his education level, his expectation and his nutritional goals which will have an impact on the presentation of this information and so may differ drastically from one country to another (Bhilwar, M. 2018).

LITERATURE REVIEW

Fahri Karakaya, et al (2018) conducted a survey of 300 respondents of USA to test their involvement in comprehension of nutritional information. It was assumed that even though nutrition, size and colour information on food labels are displayed as per the standardised instructions laid down by FDA, still consumers find some food labels more confusing. Gaia Claudia Viviana Viola, et al (Dec 2016) have tried to find an answer to the chronic health problems existing in today's era due to unhealthy eating habits not only in the western countries but also the developing countries growing economically. They felt the importance of the

food labels in moulding their unhealthy food habits into wholesome dietary patterns. **Caroline Winter (Nov 2015)** has made an attempt in his research to understand the importance of labelling in helping the consumers in making ethical food choices. **David. Samji (Oct 2015)** in his study has focussed on a very important issue of adulteration bothering the world as a whole. This study has tried to peep in the historical background of the times of ancient India of Manu Samritis and Kautilyas imposing laws against this heinous crime. **Jessie Mandle, et al., (Jan 2015)** have tried to gain insight into the perception of consumers towards nutritional labelling along with the attitude of the food industry towards labelling regulations in Africa, Asia, Middle East and Latin America. **Vinay Vaish, et al., (June 2013)** in their article have tried to highlight that the FSSA has replaced PFA and its objectives go far beyond the objectives of PFA. FSSA tries to harmonise the food laws with the international standards in terms of quality, security, hygiene and safety. **Jones. MM & Benrubi. ID (May 2013)** plunged into the history of how food adulteration of household poisoning made the American govt work on the food labelling to balance the interests of public as well as manufacturers. **CLYMBOL (Sept 2012)** in the research carried out have tried to gain a comprehensive overview of the current scenario of health claims and symbols in the EU. It has tried to investigate the different forms of claims and symbols used and the context in which they appear on the pack. **S.Storcksdieck, et al (2004)** had tried to understand the significance of nutrition food labelling in making healthy dietary choices by the consumers and their shopping behaviour.

PURPOSE OF THE STUDY

Take a glance at Indian Food labelling system. It is covered under Food Safety and Standards Authority of India (FSSAI) which has been created for laying down scientific standards for food articles and to regulate their manufacture, storage, distribution, sale and import so as to ensure availability of safety and hygiene of food for human consumption (**Mitra, S. 2017**). If we try to comprehend Indian labelling scenario, we will realise that definitely FSSAI has made progressive moves (**SME Times News Bureau, 2018**). But to judge whether it is up to the mark, studying it in isolation won't be justified. To have an idea of the advancements made by Indian labelling system, we need to throw light on the labelling systems followed by two highly modernised and advanced countries of USA, and UK so as to make comprehensive comparison in terms of liberalised and globalised era.

OBJECTIVES

This study aims at exploring, assessing and analysing the various aspects of labelling pre-packaged food:

1. To study various aspects of Indian pre-packaged food labelling regulations.
2. To compare and contrast Indian vs foreign regulations for labelling pre-packaged food (with special reference to USA and UK).

RESEARCH METHODOLOGY AND DESIGN

Data Collection- Since the nature of the present study is descriptive, data has been collected from secondary sources.

Research Design- Descriptive research design has been used in this study. This research is qualitative research.

ANALYSIS & FINDINGS

Each country has its own specifications regarding its labelling requirements and may vary from one country to another in a number of aspects. Even the laws governing these labelling requirements vary from country to country in their approach and adherence. In some countries strict adherence and transparency is demanded while other countries may be little lenient in some aspects (**Kent, D.M, et al, 2017**). So to understand and comprehend Indian food labelling, it has been compared with the food labelling regulations of US and UK.

FOOD LABELLING REGULATIONS IN INDIA

Every packaged food product meant for domestic consumption must be labelled according to the Indian Food Law i.e. Food Safety and Standards (Packaging and Labelling) Regulations, 2011. However, exported packaged food must fulfill the food laws of the importing country (**FSSAI Food License, 2018**). Food Safety and Standards (Packaging and Labelling) Regulations, 2011 safeguards the interests of the consumers and provide that every packaged food article has the following information (**Kothari, H., et al, 2017**);

- The name of Food
- List of Ingredients
- Nutritional Information
- Declaration regarding Veg or non-veg

- Declaration regarding Food Additives
- Name and complete address of the manufacturer or packer
- Net Quantity
- Code No./Lot No./Batch No.
- Date of manufacture or packing
- Best Before and Use By Date
- Country of Origin for imported food
- Instructions for use.

With all these specification, FSSAI has tried to make Indian Food Labelling updated, standardized and informative. These regulations are monitored from time to time to serve its purpose of being consumer friendly.

BACKGROUND

Pure, fresh and healthy food is one of the basic amenities for sustenance of healthy lifestyle. We live in a country having different culture and taste, reflected in its different parts. Great emphasis need to be placed on the health and hygiene in a country where prime importance is designated to the food habits of its people. The Indian apex authority which has undertaken this responsibility to regulate and facilitate its 132-crore citizens with safe and hygienic food is the Food Safety and Standards Authority of India (FSSAI). Its prime focus lies on maintaining quality level and safety while formulating laws or standards for ensuring fair trade practices. It also monitors the excessive use of undesirable chemicals, insecticides, pesticides in the food chain to make it safe for human consumption (FSSAI, 2017).

Ancient India

This parasite of adulteration ravaging our society is not of recent origin. If we see the records, it dates back to the times of pre-history. Even eminent scholars like Kautiliya and Manu have dealt with adulteration even in the second century B.C (Nayak, R. 1991). However, with the passage of time, the manner, the devices and the means of deception has considerably changed. Adulteration has always been interpreted as adding something inferior or spurious to the commodity to reduce its purity. If the product is not as per the quality demanded or as per the quality it deems to represent, it is said to be adulterated (Sethi, M. & Malhan, S. 1995). It has been the regular practice of unscrupulous traders to intentionally debase the quality of food by use of some inferior quality substitute. Primitive literature of ancient India hints on the presence of laws to fight adulteration even before the existence of Mohamman Jurisprudence (David, S. 2015).

Protohistory reveals that it was Manu, the pioneer who took the initiative in enlightening the ancient India towards social, political and economic aspects of the ancient society. He emphasised on the ethical trade practices and introduced the evil of adulteration through his writing Manusmriti (Bhattacharyya, R. 2014). His ordinance is recognised as the oldest edict throwing light on adulteration and symbolising the adulterator equivalent to concealed thieves (Muller, M. 1965). According to him, the traders need to follow certain code of conduct and had to bear punishments for boycotting these codes. Manu believed that the king must be in a capacity to handle two things, namely, proper maintenance of the rules of Dharma and Danda i.e., imposing punishment for the ones who violate the rules of Dharma (Kaur, M. 2012). Even Smriti writers like Narada had made an attempt to introduce the doctrine of Caveat Emptor which had rather empowered the unscrupulous traders and on the other hand, abstained the consumers from using their rights (Kumari, M. 2011). But with the passage of time, Manu shouldered the responsibility to tackle this problem by making new amendments and making it more exhaustive.

Abundance of literature gives a vivid picture of anti adulteration laws even in the regime of Maurya Dynasty in the treatise written about 321 B.C. titled Arthashastra of Kautiliya and the credit for these treatises can be given to the role played by Smritis in its development (Gupta,

S. 1990). Kautiliya's public welfare approach (yogaksema) was quite efficient to match with the modernised welfare schemes but even in those times too Kautiliya's yogaksema was highly threatened by the anti social elements of adulterators (Kantaka). It was assumed to be the duty of every king to deal with such culprits by Kantaka Sodhana approach which means to suppress and remove such harmful elements from the society (Devi, S. 2018).

Manusmriti and Arthashastra both belong to the same period and are based on similar moral codes, proving that the effort to blow this evil of adulteration began in the period of protohistory (Rajanikanth, M. 2017).

Medieval Period (1200-1765 AD)

In the period from 1200-1765 AD, India was marked with the entry of Muslims and foreign invaders into the country which brought about notable changes in the tastes and cuisine of India. The country saw the major revolution but the fraudulent practices of the traders did not undergo any change and they continued to exploit the consumers with adulterated goods and unfair trade practices (Sekhar, S. 2018). So, during this period too, protection of the consumers continued to be the prime concern for the rulers. Many changes were brought into account by the Mughal rulers to curb such unjustified practices. Separate shopping centres were established to sell miscellaneous commodities like grain market, oil and butter market, dry fruit market, etc., to keep a control on the market regulations. Sultan Alaudin Khilji, was one of the Mughal ruler who framed a number of regulations in

this regard and expected strict adherence and even minor violations on any ground was not tolerated (**Bakshi, S.R. 2003**). He had secret agents to inform him about the market conditions.

Modern Period

Modern era of food regulations can be better understood by bifurcating it into two phases. This categorisation has been made keeping in mind the administration dealing with the regulations. First phase i.e., Pre-Independence period deals with the advent of British rule in India. The second phase i.e., Post-Independence period with their exit and the application of Indian Constitution in framing the regulations for the food industry.

Pre-Independence Period (1765 – 1947)

With the British rule stepping up on Indian soil, it was a period of complete transition for the Indian legal system. British period, also known as the 'Colonial Era', replaced the old traditional legal system but the best part was instead of completely substituting the original customs and values, it came up with the idea of formation of unified modern legal system. This combination was although a challenge but included consumer protection in its preview designed to protect the interest of the public at a whole because consumers were still having a harrowing time dealing with the unfair trade practices. To administer justice, various rules and regulations were introduced.

- **Indian Penal Code, 1860**
- **Indian Contract Act, 1872**
- **Sale of Goods Act, 1930**

Post- Independence Period (1947- Till Date)

This era can be stated as **Pro- Consumer Era** as India demonstrated more awareness towards the consumers and their rights. Independent India assumed an active role in providing consumers their due. The Preamble of the Constitution, which was enforced on 26th January, 1950, too contained certain articles which were specifically designed keeping in mind the interests of the consumers. It also provided Constitutional remedy to every citizen by giving them the liberty to exercise their fundamental rights (**Rakshit, N.B. 2003**). The Government of India also shouldered the responsibility by enacting plethora of legislations to safeguard and secure the rights of consumers.

Till the beginning of nineteenth century, people did not realise the importance of labelling as most of their food products were locally produced. But with the advent of industrialization, people started living in an era where most of their food was bought with a label. This enabled the consumers to rely more on food labelling as a vital source of information. Various anti-misbranding regulations that came up in early twentieth century were:

- The Prevention of Food Adulteration Act, 1954
- Essential Commodities Act, 1955
- The Fruit Products Order, 1955
- The Solvent Extracted Oil, De-Oiled Meal, and Edible Flour (Control) Order, 1967
- Meat Food Products Order, 1973
- The Standard of Weights and Measures Act, 1976
- The Milk and Milk Products Order of 1992
- The Edible Oils Packaging (Regulation) Order Of 1998
- Food Safety and Standards Act, 2006-This Act authorizes the Government through its agency to regulate and control all the safety measures related to food. The agency that was established two years after the incorporation of this Act under the Ministry of Health & Family Welfare, Government of India on 5th September, 2008, was the Food Safety and Standards Authority of India (**Gera, A.K. 2018**).
- Food Safety and Standards (Packaging and Labelling) Regulation, 2011

5.2 FOOD LABELLING REGULATIONS IN UNITED STATES OF AMERICA

In United States food labelling regulations are covered under "The Food and Drug Administration" (FDA) which is responsible for assuring that foods sold in the United States are safe and properly labelled (**Porter, D.V. 1992**). The Federal laws governing food products under FDA's jurisdiction are The Fair Packaging and Labelling Act and The Federal Food, Drug, and Cosmetic Act (FD&C Act). These laws apply both to domestically produced products as well as to foods from foreign countries.

5.3 FOOD LABELLING REGULATIONS IN UNITED KINGDOM(UK)

The Food Standards Agency (FSA) is a non-ministerial government department of the Government of the United Kingdom which works with local authorities to enforce food safety regulations and is responsible for protecting public health in relation to food safety and hygiene across the UK (**Lund, V., et al, 2007**). It works for food safety, food standards, nutrition, food labelling in England, Wales and Northern Ireland. The Food Standards Agency had its national office in Scotland until April 2015 but

shifted to Wales and Northern Ireland with its headquarters in London (**Food Standard Agency, et al, 2016**). FSA had its headquarters in Scotland but after the establishment of Food Standards Scotland in 2015 who took over the responsibilities of the Food Standards Agency, it shifted its headquarters.

USA and UK are considered to be well developed economies (**Shafaeddin, M. 1998**) and but if we have a look on their food labelling regulations we will be surprised to see a remarkable difference between them as well (**Kliemann, N (July 2018)**). Their laws, their history, their cultural gaps have an impact on their labelling regulations. If these well developed countries do not match in various aspects of labelling, we cannot expect India which is still in its developing phase to catch up with them. An effort has been made to understand and compare India with these developed nations.

5.5 POLICY COMPARISON

	India	USA	UK
Food Authority	Food Safety and Standards Authority of India (FSSAI)	The Food and Drug Administration" (FDA)	The Food Standards Agency (FSA)

Food Applicable Laws	Food Safety and Standards Act	The Fair Packaging and Labelling Act and The Federal Food, Drug, and Cosmetic Act (FD&C Act).	The European Food Information to Consumers Regulation (FIC) 1169/2011
Historical Background			
Origin	The history of Indian Food Labelling dates back to the times of pre- history . Even eminent scholars like Kautilya and Manu through his writing Manu Smriti have dealt with adulteration even in the 2nd century B.C.	The history of food labelling in USA dates back to colonial times (1646)	The history of UK food labelling regulations dates back to 6000 BC
First law	In the regime of Maurya Dynasty in the treatise about 321 B.C. titled Arthashastra of Kautilya	In 1745	In 1266
13th-17th century	Sultan Alaudin Khilji , was one of the Mughal ruler who framed a number of regulations	-	The Assize of Bread and Ale was adopted. Became the first food regulatory law of British in 1266 . Enacted The Statute of the Pillory and Tumbrel . Replaced by the seal in the fourteenth and fifteenth century .
17th- 18th century	This era framed food policies for the protection of consumer against their exploitation .	In 1646 , Assize of Bread was recorded in colonial America. Virginia passed a law in 1745 regulating the flour	In 1649 , every butter packer was required to mark his initials. In 1662 , every butter pack to be marked with full surname of the

		barrels. In 1772, the law required every flour to be stamped with owner's name, name of his mill, the quantity of flour, SF for superfine and F for fine.	butter packer also. In 1749 every baker was to mark large Roman WH upon every loaf of wheaten bread and a large Roman H on every loaf of household bread .
19 th century	In 1860, The Indian Penal Code. Indian Contract Act, 1872 gave the consumers the liberty to cancel the contract in case they feel deceived or if they have been induced to enter into contract by misrepresentation.	Dr. Lewis C. Beck, published work in 1846. Lemuel Shattuck, report in 1850. Pure Foods Movement of 1870s and "Pure Food and Drugs Act of 1906"	The first Food Adulteration Act in 1860, then revised in 1872. Sale of Food and Drugs Act, 1875 was passed. Introduction of Margarine Act of 1885 and The Food adulteration Act of 1899 .
20 th century	The Sale of Goods Act 1930 The Drugs and Cosmetics Act, 1940 The Prevention of Food Adulteration Act of 1954 and The Essential Commodities Act, 1955 The Fruit Products Order 1955 The Solvent Extracted Oil, De-oiled Meal and Edible Flour (Control) Order, 1967 Meat Food Products Order, 1973 The Standard of	Pure Food and Drugs Act of 1906 was replaced by The Federal Food, Drug and Cosmetic (FD&C) Act in 1938. In 1958, new Food Additives Amendment was enacted. Consumer Bill of Rights by President Kennedy in 1962 Fair Packaging and Labelling Act in 1965 Nutrition Labelling and	Nutritional labelling , a major breakthrough in 1991. Organic Products Regulations 1992 , Food Additives Labelling Regulations 1992 , Flavourings in Food Regulations 1992 , Colours in Food Regulations 1995 , Sweeteners in Food Regulations 1995 Bread and Flour Regulations 1995 Food Labelling

	<p>Weights and Measures Act, 1976 Milk and Milk Products Order, 1992 Edible Oils Packaging (Regulation) Order, 1998</p>	<p>Education Act (NLEA) in 1990</p>	<p>Regulations of 1996 and Food Standard Act of 1999</p>
21 st century	<p>Food Safety and standards Act, 2006 was passed. The Food Safety and Standards Authority of India (FSSAI) was established in 2008. The Standards were established under Food Safety and Standards (Packaging and Labelling) Regulation, 2011.</p> <p>FSSAI Drafts New Labelling and Display Regulations 2018 was also drafted.</p>	<p>The Food Allergy Labelling and Consumer Protection Act (FALCPA) in 2004. In October 2010 four nutrients (Calories, Saturated Fat, Trans-Fat and Sodium) were specified for front of pack labels.</p>	<p>The Food Standards Agency (FSA) came into existence in 2000. Identified 14 most common allergens in “Allergen Labelling”. In 2005, back-of-pack GDA scheme was introduced, The Food Hygiene Regulations 2006 was applied on all the four countries of UK.</p> <p>New law was introduced in 2009 on the labelling of glutenfree foods.</p> <p>In 2013, The Food Safety and Hygiene Regulations.</p> <p>In 2013 "traffic light" nutrition labels was introduced.</p> <p>FIR with general labelling requirements in force from 2014 & nutritional labelling from 2016.</p> <p>In 2016, strict adherence of ‘Organic food labelling’.</p> <p>In 2017, QUID was</p>

			adopted.
Present Food Regulations			
Name of the food	Every pre-packaged product needs to carry the name of the product as the statement of its identity on the package. It must appear on the front side of the package in bold font, bold type print with at least 1/2 the size of the largest print on the label.	This information must appear on the front label or Principal Display Panel (PDP) with at least 1/2 the size of the largest print on the label	This legislation requires every food item to declare its legal name. No fixed size.
Manufacturers' or distributors' name and address	Needs to declare the details of the manufacturer and the name and complete address of the packing or bottling unit as well. If the products are imported the name and address of the importer.	The name and address of the manufacturer, packer or distributor on the label of the product for the requisite information.	The name or the business name and address of the food business operator (FBO).
Net Quantity	Net quantity in weight, volume or in number. The weight of the wrappers and packaging materials not to be included. If not feasible, the total weight of the wrapper should not exceed eight per cent.	Be in weight or measure, the amount needs to be expressed both in US (inches/pounds/fluid ounces) units and metric versions (grams/litres).	The net quantity for liquid products in litres, centilitres, millilitres and in kilograms or grams for other products except on products with quantity less than 5g or 5m.
Ingredients	The ingredients are to be listed in the descending order of their weight and volume.	Ingredients are listed in this ingredient list in descending order by weight. Spices, natural flavor, artificial flavors, chemical preservatives must	All the ingredients with their generic names in descending order of its weight. Food Additives, Flavouring agents, compound ingredients, Food enzymes (preferably with the use

		also be declared.	of E number) must be mentioned.
Lot/Code/ Batch identification	The batch number, code number or lot number must be compulsorily displayed.		
QUID	Percentage of the ingredient (QUID) only if its omission may mislead the consumers.		QUID indication as a percentage, beside the name of the respective ingredient.
Declaration of Food Additives & colours or Flavours	Has a separate provision to disclose all the food additives, colours or flavours added.	Included in the provisions of Ingredients.	Included in the provisions of Ingredients.
Nutritional labelling	To be stated in numerical terms as per 100g or 100ml or per serving. The energy value in terms of kcal; protein, carbohydrate and fat present in terms of gram (g) or ml. Extra nutrients like vitamins, proteins, minerals, metals, amino acids or enzymes to specify their quantities.	"Nutrition Facts" in 3 bars: Serving size, Nutrients, Vitamins & minerals with Calories, fat, sodium, carbohydrate, protein. The format of calorie count changed to a much larger font size for obesity control. Other key nutrients into two main groups: " Limit these Nutrients " in yellow & " Get Enough of these Nutrients " in blue.	Nutrient content of Fat, saturates, trans fat, mono-unsaturates, polyunsaturates, carbohydrate, sugars, polyols, protein, salt and fibre in a clear format and if feasible in a tabular format. The values for the nutrients on per portion and/or per consumption unit basis only but for energy, both per 100 g/ml and per portion or per consumption unit.
Product Dates / Lot Codes	Best Before/ Use By Date or Expiry date needs to be specified. The time of manufacturing and packing of the product in terms of date, month and year if the shelf life is less than three months and only in month and	"Open Dating" and "Closed Dating" is normally specified. The various phrases used are " Best if Used By/Before Date ", " Sell-By date ", " Use-By Date ", " Expiration	Highly perishable and likely to constitute an immediate danger needs to mention a 'use by' date and for other foods, the minimum durability. Special storage conditions or conditions of use or time limit for consumption may also

	year if the shelf life is more than three months.	Date".	be required.
Veg/ Non-Veg declaration	Required to indicate whether non-vegetarian or vegetarian with the specified symbol and its size has also been specified.	---	---
Allergen Labelling	Under consideration as per the FSSAI Drafts New Labelling and Display Regulations 2018 in which Cereals containing gluten; i.e., wheat, rye, barley, oats, spelt or their hybridized strains and products of Milk; Fish; Eggs; Soybeans; Peanuts & tree; Crustacean; Sulphite of 10mg/kg or more have been recognized as allergens.	FALCPA identified milk, egg, fish, Crustacean shellfish, tree nuts, wheat, peanuts & soybeans as allergens and need to be specified. Declaration through advisory statements like "may contain" is not required under the act in USA.	Cereals containing gluten, rye, barley, oats or their hybridised strains, and products thereof; Crustaceans; Eggs; Fish; Peanuts; Soybeans; Milk; Nuts; Celery; Mustard; Sesame seeds; Sulphur dioxide and sulphites; Lupin and Molluscs are identified as allergens. Use of 'May contain' labelling is also recommended.
Country of origin / place of provenance	Compulsory requirement to disclose the country of its origin.	Food products covered by the law include muscle cut and ground meats: lamb, goat, and chicken; wild and farm-raised fish and shellfish; fresh and frozen fruits and vegetables; peanuts, pecans, macadamia nuts; and ginseng	The food product must specify the 'place of provenance'. Food products covered by the law include beef, veal, lamb, mutton, pork, goat and poultry; fish and shellfish; honey; olive oil; wine; fruit and vegetables imported from outside the EU
Instructions for use	Need to be declared if necessary.	Need to be declared if necessary.	Need to be declared if necessary.
Alcoholic strength	---	Department of Treasury regulate the alcohol industry.	Beverages containing more than 1.2% by volume of alcohol must indicate the alcoholic strength by volume.

Additional mandatory requirements	---	---	Certain food items must provide additional information like 'packaged in a protective atmosphere', 'with sweetener(s)', 'with sugar(s)', etc
Genetically Modified Organisms (GMO) Foods	Under consideration	To be effective from 2020.	The growth as well as sale of GMOs are permitted subject to an intensive authorization process. Food labels must specify genetically modified organisms as well as ingredients produced from GMOs.

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