

Frequently Asked Questions (FAQs) on FSS (Labelling & Display) Regulations, 2020

1. What 'name of food' is to be used under clause 5(1) of these regulations?

The identical name of food provided under FSSR, other than the main category/sub category name. In the absence of such name, either a common or usual name or an accompanying description of true nature of food shall be used. It may additionally have a "coined", "fanciful", "brand" or "trade name" subject to compliance of Food Safety & Standards (Advertising and Claims) Regulation 2018.

2. Whether FSSAI logo shall be displayed in colored format only?

FSSAI logo & license No shall be displayed on label of the food package in contrast colour to the background. For example-black color with white background.

3. In what manner, FBO can declare date of manufacture or packaging/Expiry/Use by/Best Before, for products with shelf life of more than three months?

FBO may declare the dates in any one of the following formats:

- The month and the year in un-coded numerical sequence- the month shall be indicated by capital letters and abbreviations (at least first three letters of the month) may be used.
Example: "Mfg.date: MAY 2021"
- The day, month and year using the DD/MM/YY format
Example: "Mfg.date: 21/05/21"

4. What is the meaning of "Class Name" referred to in labeling of flavors or flavoring agents under regulation 5(5)?

The term "Class Name" refer to the types of flavoring agents mentioned under sub-regulation 3.3.1 of FSS (Food Products Standards and Food Additives) Regulations,2011. Hence in declaration of flavors on food products i.e. Natural Flavors and Natural Flavoring Substances, Nature-Identical Flavoring Substances, the class names should be either "Natural Flavors or Natural Flavoring Substances" or "Nature-Identical Flavoring substances", as the case may be.

5. Examples of raw agriculture commodities exempted from Allergen Labelling?

Products which are not processed and sold in supply chain in raw form like peanuts, pulses, cereals like rice, pulses, fruits and vegetables including dry fruits, spices and herbs

6. Whether Sucralose as Sweeteners are now permitted for Children as well, as there are no warning statement requirements in the directions issued by FSSAI dated 29th Jun 2021 vs. Sucralose that was not permitted for children under existing labelling Regulations?

Sucralose is a permitted sweetener as per FSS (FPS & FA) Regulations, 2011 and it does not require any warning statement now.

7. Please clarify “accompanying documents” provided under labelling requirements of non-retail container?

Any document other than the invoice - that provides information regarding list of ingredients, declaration of veg or non-veg, net quantity - would account for an accompanying document.

8. Whether colors and flavors may be declared separately from the ingredient list declaration on the packs of toffee and candies?

Yes, colors and flavors may be declared separately from the ingredient list declaration or within the ingredient list on the packs of toffee and candies where color and flavor are the only variance.

9. Whether labelling requirement on front of pack like veg/non-veg logo and name of the food in packages with surface area up to 100 cm² exempted?

No, declaration regarding veg/non-veg logo cannot be exempted as this is culturally sensitive issue for informed choice.

10. What are the labelling requirements for Wholesale packages?

The concept of wholesale packages has been subsumed in the provision of Non Retail Container (Refer direction dated 17.06.2022). The FBO need to comply with requirements of Non Retail containers.

11. Whether product name (within box) and veg logo may be written on the back panel or any other panel except Front panel, wherein all regulatory requirements are grouped together?

No, Product Name and Veg/Non-veg logo need to be declared on front-of-pack only as per the norms.

12. Whether oil will be single ingredient product if it is fortified or enriched or added with vitamin or minerals or approved additives, any other healthy ingredients?

No, such products are not single ingredient products. Therefore, they won't be exempted from declaration of Nutritional information.

13. Whether number of servings and %contribution RDA needs to be declared in case of fortified single ingredient foods such as oil, flours etc.?

No, fortified single ingredient foods such as oil, flours etc. are exempted from declaring number of servings and %contribution to RDA.

14. With respect to clause 2 (1) (q) – relating to definition of Recommended dietary allowances (RDA), which RDA values FBO needs to refer for labelling purposes?

FBO needs to refer to the list of RDAs published by ICMR and FSSAI from time to time. In absence of RDA values, the values of Codex & WHO can be referred.

15. Whether a food additive carried over into final food (from raw material or ingredients or compound ingredients) in an amount not performing a technological function in the finished product needs to be declared on label?

No, such food additives are not required to be declared on labelled.

16. Whether processing aids are required to be declared on the label under list of ingredients?

No, Processing Aids are not required to be declared on the label under list of ingredients.

17. Is it mandatory to give trans-fat in NI table & % RDA for the products containing only naturally occurring trans fats like milk fat, animal fat etc.?

No, for products containing only naturally occurring trans-fat, the 'trans-fat' declaration & % RDA is not mandatory.

18. As per clause 5.3.b, can %RDA value be read as %Daily Value where applicable.

No, the terminology is only Recommended Daily Allowance (RDA) as mentioned in section 22 of FSS Act, 2006 which cannot be read as %Daily Value.

19. What abbreviations can be used in case of date marking, for the particulars on “Date of manufacture or packaging”, “Expiry/Use by”, ‘Best Before date’?

Yes, any unique identification marks may be used. Illustrations,

- (i) For “Date of manufacture”: Mfg. date, Mfd., Mfg. dt., MFD may be used
- (ii) For “Date of Packaging”: Pkg. date, Pkd., Pkg. dt., Pkd, PKD. by may be used
- (iii) For “Expiry date”: Exp. Date, ED, Exp. dt., EXD. or Exd, EXP or Exp or E or Ex may be used
- (iv) For “Best Before date”: BBD, BB date, BB dt., Best before dt. may be used. Alternatively, the erstwhile format of ‘Best Before..... months from manufacture/packaging (as applicable)’ may be used.
- (v) For “Use By”: Use By, Use By date, Use by dt., U. By, UB date, UB dt, UB, UBD may be use

20. Is there any flexibility in the manner of declaration of date marking as DD/MM/YY?

Yes, this may also be given as DD/MM/YYYY or DD/MMM/YY or DD/MMM/YYYY, where MMM is alpha, first three letters of the month. For example, August is AUG or Aug.

21. What is the meaning of "Class Name" referred to in labelling of flavours or flavouring agents under regulation 5 (5) (a) (ii) in the FSS (Labelling & Display) Regulations, 2020 and how can flavours be declared according to it?

The term "Class name" mentioned under regulation 5 (5) (a) (ii) in the FSS (Labelling & Display) Regulations, 2020 refer to the types of flavoring agents mentioned under sub-regulation 3.3.1 of FSS (FPS & FA) Regulations, 2011. Hence in declaration of flavour on food products i.e. Natural flavour(s) and Natural flavouring substances, Nature identical flavouring substances, Artificial flavouring substances the class names should be either "Natural flavour(s) or Natural flavouring substances" or "Nature-identical flavouring substances" or "Artificial flavouring substances" (with common name), as the case may be. Illustration below:

Product A: Ingredient A, Ingredient B, Natural flavour,

Product B: Ingredient A, Ingredient B, Natural flavouring substances,

Product C: Ingredient A, Ingredient B, Natural flavour & Nature Identical flavouring substances,
...

Product D: Ingredient A, Ingredient B, Flavour (s) (Natural, Nature Identical & Artificial (vanilla) flavouring substances) ...

Product E: Ingredient A, Natural flavour, Ingredient B, Nature Identical flavouring substances, ...

Product F: Ingredient A, Ingredient B, Flavor(s) (Nature identical & Artificial (vanilla) flavouring substances),..... ’

22. How to display the FSSAI Logo mentioned under sub-clause (5) (7) (a) of Chapter-2?

The FSSAI Logo should be in contrast to the background of the label. For e.g., it can be given in black, white or any colour(s).

23. What is the requirement for labelling Sulphite as an allergen under clause 5 (14) (viii)?

Sulphite as an allergen needs to be declared only when sulphite is in concentrations of 10mg/kg or more. Concentration of 10 mg/kg is specifically for Sulphur dioxide content as an allergenic compound.

24. Under regulation 8(1), what do the word ‘surface area’ of the package mean?

The surface area includes all the visible area of the package excluding the (vertical / horizontal) seal areas. The area thus calculated shall be within the area as is provided in regulation 8(1) so as to be eligible for exemption provided as are stipulated.

25. What is a single consumption pack?

Single consumption pack is a package of pre-packaged food which is normally eaten by a consumer in one eating occasion.

26. Can number of servings be an approximate value?

Yes, number of servings could be an approximate value, which could be an integer or decimal.

27. Is serving measure and number of servings in package required to be declared for food where NI is exempted?

No, ‘serving measure’ and ‘number of servings in package’ are not required for food where NI is exempted.

28. For the clause 1. 1 (1) of Schedule II relating to mandatory declaration of Polyols, which all polyols are to be considered?

For the declaration of Polyols, following polyols shall be considered Lactitol, Maltitol, Mannitol, Xylitol, Erythritol, isomalt, sorbitol.

29. For declaration of allergens which arise due to cross contamination, the illustration format ‘May contain.... (Name of allergen) as specified in clause 5(14) shall only be used?’

No, the format given there in is for illustration purpose. Any other format that conveys similar meaning may be provided e.g., ‘May Contain traces of _____ (name of allergen)’, ‘Manufactured in the same facility which processes _____ (name of allergen)’ etc. may be used.

30. Whether nutritional information (NI) needs to be declared on products such as sugar, jaggery, cereals, pulses?

To bring clarity in concerned clause in FSS (Labelling & Display) Regulations, 2020, Authority has approved to exempt Raw agricultural minimally processed products and/or products that comprise a single ingredient from declaration of Nutritional Information.

Explanation: Minimally processed foods are the ones that are slightly altered for the main purpose of preservation but which do not substantially change the nutritional content of the food. This may involve cleaning and removing inedible or unwanted parts, grinding, refrigeration, pasteurization, fermentation, freezing, and vacuum-packaging.”

31. What are single ingredients foods?

Any food having only one ingredient which do not have any food additives are termed as single ingredients foods.

32. Is ingredient list mandatory for non - retail containers?

Yes, it is to be provided in the accompanying documents. However, it is not required, if the same is provided on the label of the non-retail container or pre-packaged foods within the non-retail container.

33. Is Nutritional Information mandatory for non - retail containers (NRC)?

No, Nutritional information is not mandatory for non – retail containers as per the revised provision for NRC (Refer direction dated 17.06.2022).

34. Whether the name and complete address of all manufacturing units along with licence number is to be declared on label?

Sub-regulation 5 (6)(a) of Food Safety and Standards (Labelling and Display) Regulations, 2020 stipulates the requirement of the name and complete address of the brand owner only, on the label whether or not, he himself is the manufacturer, marketer, packer or bottler, as the case may be. Also, as stipulated in sub-regulation 5 (7)(b) of the said Regulations, the FSSAI logo and license number of the brand owner along with the license number of the manufacturer or marketer or packer or bottler, as the case may be, if different from the brand owner, shall also be displayed on the label.

35. Whether labelling requirement of Address of brand owner, license number, etc. under the Regulations can also be given through QR code apart from Bar Code/ GTIN on the label?

Yes, labelling requirement of Address of brand owner, license number, etc. under the Regulations can also be given through QR code apart from Bar Code/ GTIN on the label.

36. As per clause 5.3.b, is it %RDA as ADDED SUGAR to be provided by considering per serve value of all ADDED SUGARS or just for “Sucrose” part.

50g RDA shall be considered for Added Sugars.

37. What is the application of the ‘Principal Display Panel’ (PDP) area calculation as stipulated under regulation 6 (2), 6(3) of these regulations?

The PDP area calculation is as given in regulation 6 (2) of these regulations. Accordingly, the height of any numeral and letter as required in table 1 of column 6(3) shall be arrived at. Further, this PDP area shall be used to arrive at the dimensions of veg or non-veg logo as per the table given in regulation 5 (4) (c) of these regulations.

38. Is ‘+F’ logo required for both Iodized Salt (fortified with Iodine only) and Double Fortified Salt?

Since the Iodization of common salt is mandatory since 2005, the product does not require any promotion as a fortified commodity. Hence the requirement of carrying “+F” logo on label in case of Iodized Salt (fortified with Iodine only) shall not be applicable.