

COTTONSEED OIL CONCLAVE 2017

16th December 2017

Hotel Courtyard by Marriott, Ahmedabad,
Gujarat,

Recent Regulatory Updates

Dr Prabodh Halde

President AFST-India

Convener SEA Regulatory Committee

16th Dec 2017

Agenda

- **Evolution of Modern Regulations**
- Recent regulatory changes

Reference of Cotton Seed Oil In History

कार्पासी तुण्डकेरी च समुद्रान्ता च कथ्यते ।
कार्पासकी लघुः कोष्णा मधुरा वातनाशिनी ।
तत्पलाशं समीरघ्नं रक्तकृन्मूत्रवर्धनम् ॥१३०॥
तत्कर्णपीडकानाद पूयास्राव विनाशनम् ।
तद्वीजं स्तन्यदं वृष्यं स्निग्धं कफकरं गुरु ॥१३१॥
भा.प्र
कार्पासी मधुरा शीता स्तन्या पित्तकफापहा ।
तृष्णादाहश्रमभ्रान्ति मूर्छाहृद्वलकारिणी ॥१८९॥
रा.नि.

- Cotton has been cultivated in India from 5000 yr
- Ayurveda has given lots of benefits of Cotton seed & its oil
 - **Cotton seed:**
Quality- Snigdha – Oily, unctuous
Vipaka – Madhura – Undergoes sweet taste conversion after digestion
Veerya – Sheeta – coolant
Kaphakara – increases Kapha Dosha.
Prabhava – Seed – Vrushya – aphrodisiac,
 - improves vigor

Seed is Vatanashini – useful in treating disorders of Vata Dosha imbalance such as neuralgia, paralysis, constipation, bloating, etc
Seeds promote lactation

Birth of Modern Regulations

Tort of Negligence -1932

- *Donoghue vs Stevenson* - 1923
- A fight of brave lady for 9 years against present system to evolve new regulations
- **Mother of all Control Orders & Consumer Protection Law**

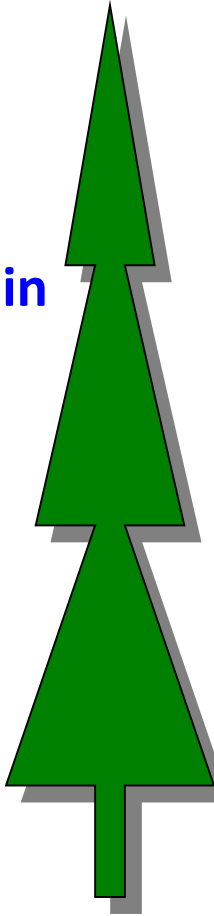


Snail in Ginger Beer

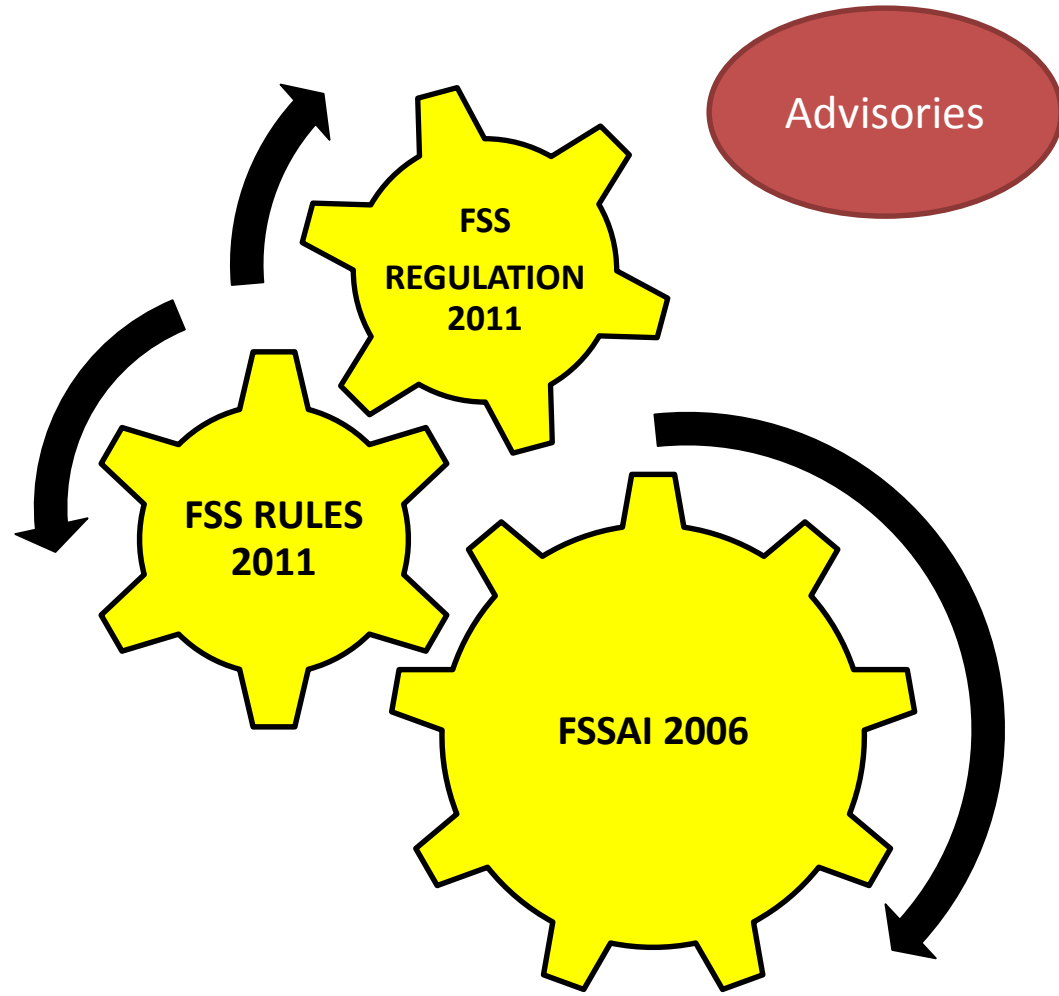
Science behind Regulation

Food Legislation – Milestones in India

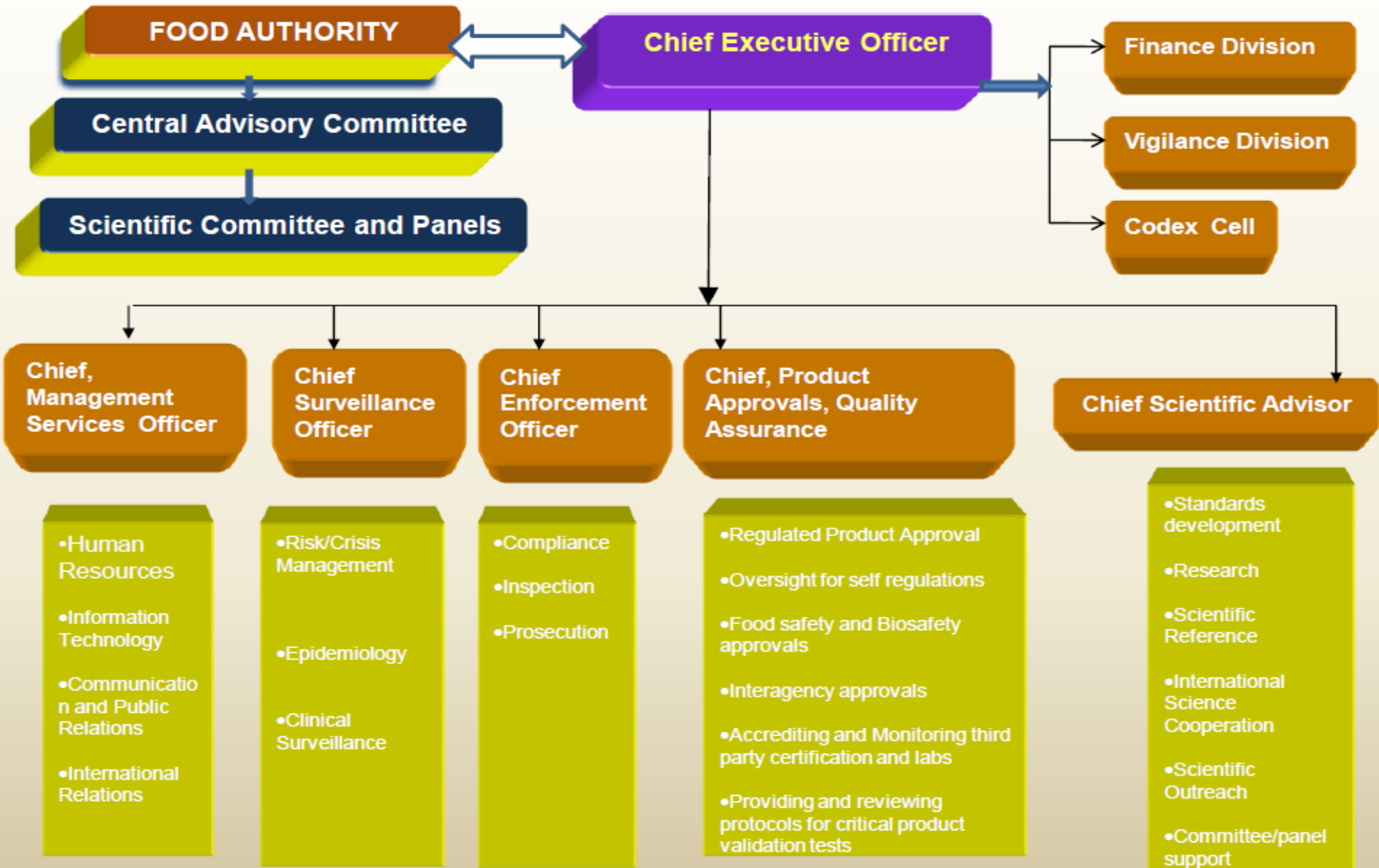
- 1899** : States' / Provinces' own food laws with difference in standards for the same commodity -- Conflicts in inter provincial trade.
- 1943** : Central Advisory Board for Central Legislation that brings in uniformity throughout the country.
- 1954** : Central Legislation – Prevention of Food Adulteration Act, 1954.
Rules and Standards framed under the Act 1955.
- 2006: FOOD SAFETY & STANDARDS ACT – 2006.**
- 2011** : FSSRR 2011
- 2012** – Import Regulation
- 2016-** Nutraceutical Regulations /Product Recall



FSSAI Legislative Frame



FSSAI Structure



FSSAI 'S New Initiatives



FSSAI Is changing

SEA Partnership with FSSAI

- FOSTAC – Training
- Codex Participation
- Vit A/D Fortification in Oils and Fat
- SNF @ Schools
 - Development of e modules for school
- Pink book and Yellow book distribution

Recent Updates

LM

Plastic Rules

FSSAI

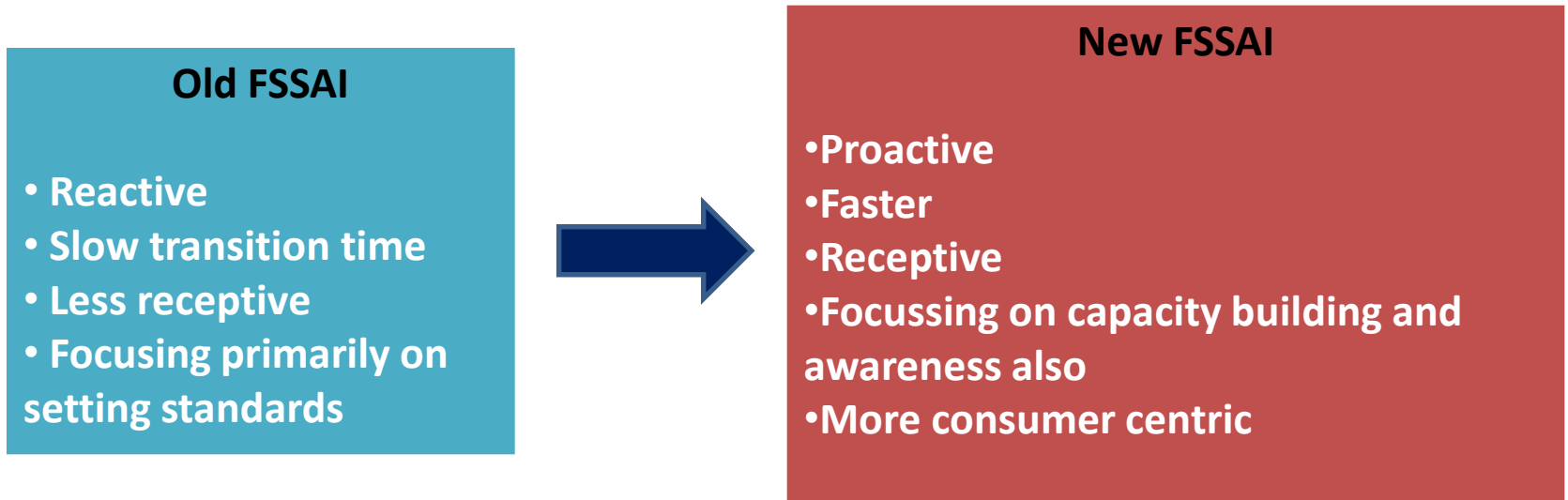
Indian Regulatory System

Regulation for Food:

- Food Safety and Standard Act, 2006
- Legal Metrology Act, 2009 & Packaged Commodities Rules, 2011
- The Essential Commodities Act, 1955
- Bureau of Indian Standards (BIS)
- AGMARK
- Consumer Protection Act
- ASCI

Food Safety and Standards Regulation

Our observations on recent changes in the work dynamics of FSSAI



As a result of which, FSSAI has taken up a lot of new initiatives

Focus areas of FSSAI and the outcomes

New Regulations and Standards

1. Proprietary Food Regulations
2. Nutraceutical Regulations
3. Food not Specified Regulations
4. Organic Foods Regulation
5. Food Fortification Regulation
5. Advertisements and Claims Regulation
6. New Packaging Regulation
7. Food Recall Regulation
8. Additive Harmonization
9. New standards for VCNO, Peanut Butter, Noodles and Seasoning etc
10. New FSMS guidelines

Training, Capacity Building and Awareness

1. Food Fortification Resource Centre
2. FOSTAC initiative
3. Traditional Food initiative
4. Safe Street Food Initiative
5. SNF initiative

Focus areas of FSSAI and the outcomes

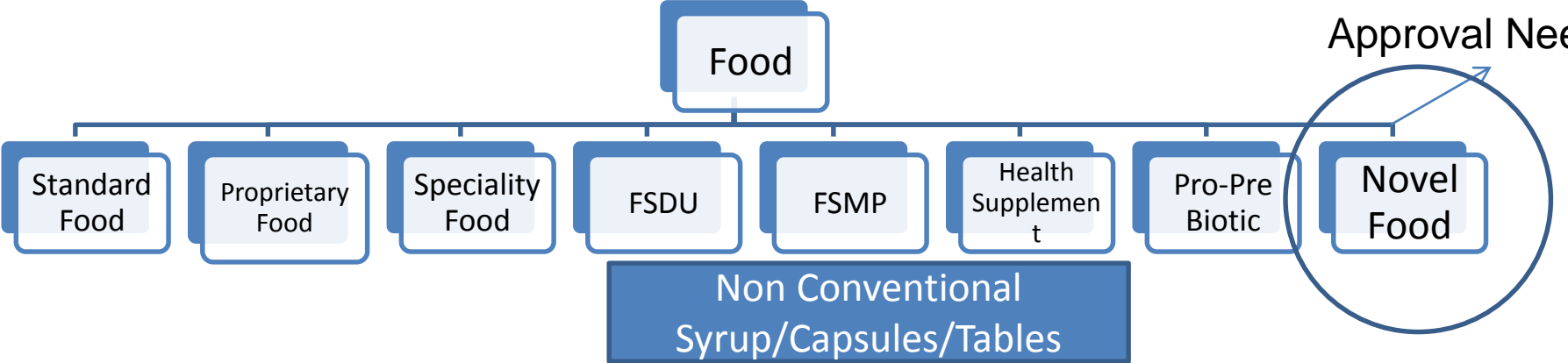
Industrial Representation

1. Standard Review Groups for different categories of products
2. FSMS consultation groups
3. SNF partnerships
4. FOSTAC partnerships
5. Invitation of comments on notices and drafts
6. Industrial representation in Authority Meetings

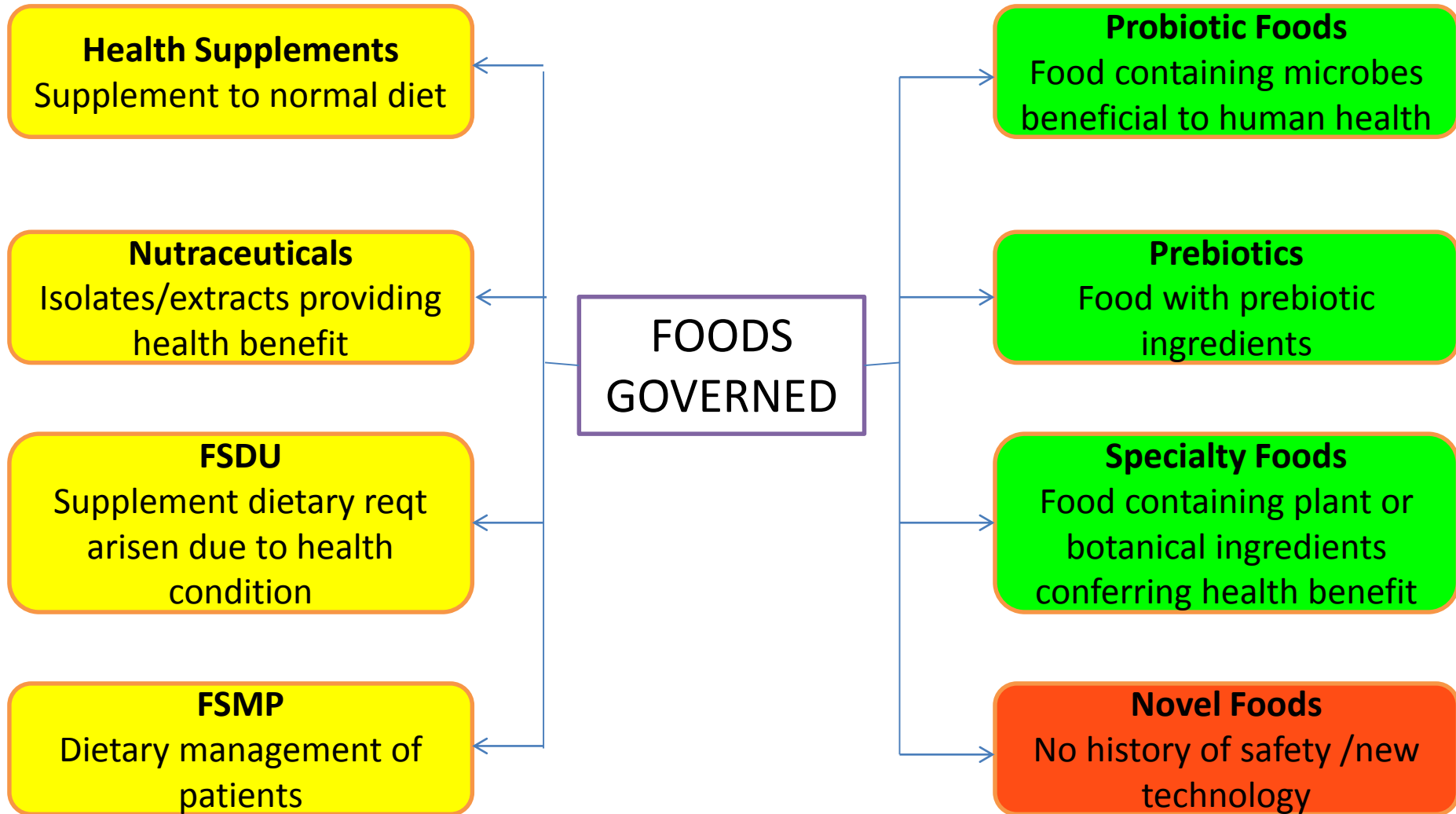
Consumer Centric Approach

1. Consumer Grievance Mechanism initiated and industries urged to designate a Nodal Officer
2. Food Safety Connect, whatsapp number, email id and helpline number initiated

New Nutraceuticals Regulation



Food categories



Fostac

- SEA is approved partner with FSSAI as Training partner
- Technical trained person is compulsory for FBOs
- We trained over 35 Master trainers so far
- Conducted over 7 trainings all across India
- Request if all partners to conduct such training

Food Safety Training and Certification

TO START

REGISTER HERE



SEA

FBO



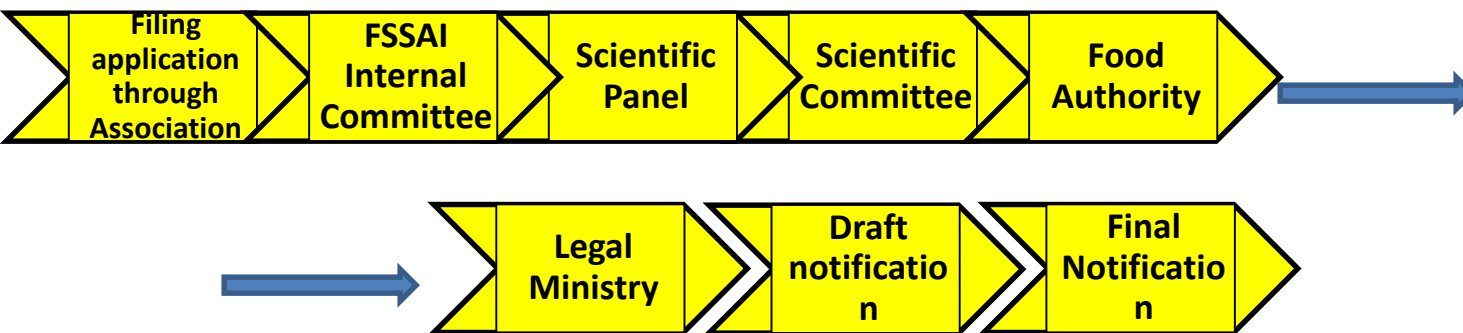
<https://fostac.fssai.gov.in>

Regulatory Changes - Flow

Flow of Regulatory Process at FSSAI

8 step process at different levels of Authority once application is filed

Timeline required for any regulatory process : Any thing from 1 year to 4 years




Legislative LM Amendment-2017

LM Amendment – GSR 629 (E)-June 2017

Highlights:

- Legal Metrology (Packaged Commodities) Rules amendment proposed to implementation by Jan-2018
- Most proposed amendments are industry friendly with clarification for interpretation of rules and applicability
- Impact of the new GSR is mainly in areas of Labelling, PDP area, e-commerce Products specs, and compounding fees.
- Total Permissible error in net qty. and samples size consideration for the determination of error in net qty.
- Representation of the numericals associated with Net qty, MRP, Use before date clarified

Old PFA Cases



F. No. P. 15017/120/2016-FSSAI/Legal
Food Safety and Standards Authority of India
FDA Bhawan, Kotla Road, New Delhi – 110002

Dated, the 8th December 2017

ORDER

Subject: Cases against FBOs for violation of old standards of food products even though they are in conformity with the new/revised standards-reg.


All food articles manufactured and / or sold in India are required to be in conformity with the provisions of the Food Safety and Standards Act, 2006 (FSS Act) and its various regulations. Before the FSS Act came into operation, food products were required to be in conformity with the provisions of the Prevention of Food Adulteration Act, 1954 and Rules & Regulations framed thereunder. Accordingly, food products for which standards and/ or other such provisions do not exist, are not allowed to be manufactured, imported or sold.

During the last few years, a large number of new standards have been framed by the Food Safety and Standards Authority of India. It has also amended standards for several food products, keeping in view the scientific evidence for ensuring an appropriate level of safety. While the standards have become more rigorous in respect of some food products, in some other cases these have become less stringent and/ or with relaxed norms in comparison to standards/ norms prescribed earlier.

The field machinery tasked with the responsibility of ensuring food safety may have lodged cases against some FBOs for violation of the old standards even though the impugned products may now be in conformity with the new/ revised standards. It may be appreciated that such revision of standards has taken place after taking into account all scientific evidence required to ensure appropriate level of protection of human life and health. Engaging of State machinery in pursuing such cases not only diverts the scarce resources of the government but also burdens the judicial system.

Accordingly, Commissioners of Food Safety, are advised to withdraw, or, at least, not pursue, cases for violation of old norms and standards unless these are still not in conformity with the new/ revised standards so that avoidable harassment of FBOs could be prevented. The result of this exercise may please be appraised to FSSAI from time to time.

This issues with the approval of the Competent Authority.


(Raj) Singh
Head (Legal)
Tel no.- 011- 23220997


To,
Commissioners of Food Safety,
All States/ UTs.

- FSSAI has taken initiative to close the old PFA cases
- All misbranding and sub standard cases to be compounded
- Gujarath FDA has compounded 1500 cases so far
- Kindly use this opportunity

Recent Amendments

- **Inclusion of Alkali Blue indicator for the determination of Acid Value of rice bran oil in place of phenolphthalein**
- **Revision of iodine value of cottonseed oil from 98-112 to 98 to 123**
- To increase the Unsaponifiable value of Blended edible vegetable oils blended with physical refined rice bran oil up to 4% (Not more than 4.0 percent by weight; provided that oryzanol content be minimum of 0.20% (by weight) with rice bran oil at 20% level and with an increment of 0.05% with every 5% rise in rice bran oil content in the blend.”)
- Maximum pack size permitted for blended edible vegetable oils to be changed from 15 litres to 15 kg

Recent Amendments

- Palm stearin as edible fat and permitted to use in the manufacture of vanaspati and interesterified fats
- To redefine Interestified Vegetable Fat into Interestified Vegetable Fat/Oil
- To include Enzymatic degumming process in the refining process
- Removal of BR reading for IE- fat
- Voluntary Fortification of Edible Oil with Vitamin A & D – 4.5 /25IU
- Exemption from refining for Expelled/Pressed coconut oil imported in India 

Recent Amendments

- Operationalization of HS, SMP, NF and Nutraceutical draft Regulation
- Operationalisation of import guidelines
- Operationalisation of Proprietary food regulations
- **Guidelines for operations of e-commerce food business operators**
- **Palm and Palm kernel Oil Standards: FFA Not more than 10**
- Exception of imported raw coconut oil for refining
- **Enforcement notice w.r.t repeated use of edible oil**
- **Organic food standards**

Important

- Palm and Palm kernel Oil Standards: FFA Not more than 10.
Standards for Virgin coconut oils
- Standard for peanut butter
- **Draft**
- The oils and fats covered under the regulation 2.2 shall comply with the fatty acid composition of the respective oils and fats given in the tables
- Claim guidelines
- New Labelling regulations.

Draft Standards

- Draft notification Standards of Kachi Ghani Mustard Oil
 - The oil shall be labelled as Kachi Ghani if the content of Natural essential oil as allyl isothiocyanate is in the range of 0.25-0.60%.”
- Palm oil with regard to melting point
 - Melting point (capillary slip method) : Not more than 39° C
- New Standards of Palm Stearin; Palm Kernel Olein; Palm Kernel Stearin; Superolein; Avocado Oil;
- Inclusion of Peroxide Value in standards of all vegetable oils

Free Fatty acid

- Draft notification regarding removal of 'Boudouin test' requirement for Blended edible Vegetable Oil and revision of special provisions relating to sale of Vanaspati
- Draft related to inclusion of fatty acid composition in the standards for Edible Oils

Fatty acid	Cotton- it seed oil
C6:0	ND
C8:0	ND
C10:0	ND
C12:0	ND-0.2
C14:0	0.6-1.0
C16:0	21.4-26.4
C16:1	ND-1.2
C17:0	ND-0.1
C17:1	ND-0.1
C18:0	2.1-3.3
C18:1	14.7-21.7
C18:2	46.7-58.2)
C18:3	ND-0.4
C20:0	0.2-0.5
C20:1	ND-0.1
C20:2	ND-0.1
C22:0	ND-0.6
C22:1	ND-0.3
C22:2	ND-0.1
C24:0	ND-0.1
C24:1	ND

Recent Updates

- **Notice for Food Safety and Standards (Third Party Food Safety Auditing) Regulations, 2017.**
 - **Monitoring of food safety through third party audit**
- The Authority has allowed the sale of Edible Oil through automated tamper proof vending machines, which will be packed in sealed, tamper proof packaging material complying to the FSS (Packaging and Labeling) Regulation
 - To control the loose oil

Proposed Changes

The Food Authority in its 23rd meeting held on 25th May proposed the new draft regulations for Packaging and Labeling which mandates the following declaration on front of pack

- a) The amount of total fat, sugars and sodium per serve size
- b) The percentage (%) contribution to RDA by the above mentioned components

Front of Pack Labeling

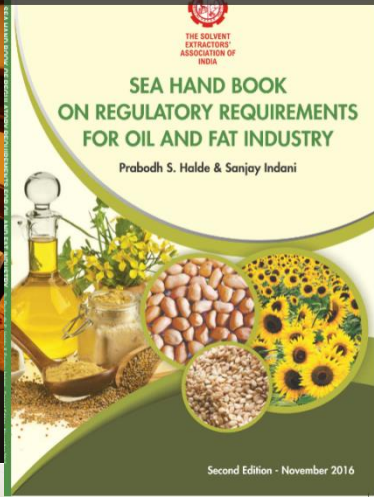
The format to be followed is

Fat 4.9 g	Sugars 3.6 g	Sodium 0.05 g	} Part 1 } Part 2
7%	4%	3%	

Future Regulatory Trends

- Harmonization & Equalization
- Clean Label
- Transparency
- Traceability
- Consumer Engagement
- Structural Enforcement
- Vulnerability Assessments
- Non GMO Claim
- Environment issues : Plastic Ban

Advocacy @ SEA/AFST



Codex participation
Leadership position in association
Partnership with regulator
4 Books
10 seminars

Conclusion

- Regulatory changes are dynamic
- Need to engage with regulators to understand the changes
- Consumers are empowered through social media
- Compliance is hygiene
- Cost of regulatory (non compliance) will be high



Thank You Any Query.....

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