



August 2025

Recently, India has made significant progress in global trade negotiations and policy frameworks impacting the food and agriculture sectors. Notably, in May 2025 India and the United Kingdom finalised the landmark UK-India Free Trade Agreement, which propose to phase out tariffs on several goods, including food and beverages. India is also holding parallel discussions on trade deals with other jurisdictions, such as the United States and the European Union, to safeguard the food and farm sectors. In June, state-level regulatory supports were also introduced, with Andhra Pradesh reducing Urban Development Authority fees for rural food-processing units, bringing them in line with village-level charges to ease establishment costs.

To promote the deployment of hi-tech sophisticated technology in the farm sector, Government of Maharashtra introduced 'MahaAgri-AI Policy 2025-29' ("**MAIP**"). This is an ambitious comprehensive Artificial Intelligence ("**AI**") strategy for agriculture, marking India's first such policy, with an initial budget of INR 500 crore (Indian Rupees five hundred crore) and additional funds will be made available as per the requirements. A special budget line is proposed for the capacity-building initiatives to be taken for the farmers and extension functionaries of the Agriculture Department for use of Artificial Intelligence powered tools and solutions. MAIP aims to integrate AI, drones, robotics, and advanced analytics to address challenges like climate change and low productivity by focusing on creating AI-powered platforms for real-time advisories, yield prediction, and precision farming. It aims to promote real-time advisory systems, precision farming tools, and end-to-end traceability platforms to deliver better outcomes for both farmers and consumers.

Some of the key features of the MAIP are:

1. deploy context-specific GenAI and emerging technology enabled tools for crop planning, disease and pest prediction, irrigation management, supply chain optimisation, postharvest handling, and market access;
2. build digital public infrastructure for agriculture;
3. deploy a unified, AI-enabled 'Remote Sensing Intelligence Engine' to serve as a shared digital public good across multiple departments. This engine will process satellite imagery, drone feeds, and Geographic Information System datasets to generate high-resolution insights on land use, crop health, water availability, soil moisture, vegetation indices, and disaster risk;
4. Develop and deploy a statewide food traceability and quality certification platform as part of digital public infrastructure; and
5. promote farmer centric design and adoption.

In recent months, the Government of India has taken measures to curb the price of edible oils including cut on import duties and conducting the inspections to ensure companies pass on the benefits¹. Most refiners have lowered their prices, and early signs indicate that consumers are beginning to see the benefit.

This edition of the JSA Foods and Consumer Newsletter highlights recent (June 2025) regulatory developments focused on consumer protection and the food businesses in India.

Advisory on self-audit by e-commerce platforms for detecting dark patterns on their platforms and ensure its resolution²

The Central Consumer Protection Authority has issued guidelines to ensure that no one engages in deceptive and unfair trade practice which are in the nature of dark patterns. The Consumer Protection (E-Commerce) Rules, 2020 stipulates under Rule 4(9) that every e-commerce entity must only record the consent of a consumer for the purchase of any good or service offered on its platform where such consent is expressed through an explicit and affirmative action, and no such entity must record such consent automatically, including in the form of pre-ticked checkboxes. Therefore, all e-commerce platforms, industry associations, voluntary consumer organisation and academic institutions, are advised to take necessary steps to ensure that their platforms do not engage in such deceptive and unfair trade practice which are in the nature of dark patterns. Inter-alia, all e-commerce platforms are advised (a) to conduct self-audits to identify dark patterns, within 3 (three) months from June 5, 2025, and take necessary steps to ensure that their platforms are free from such dark patterns; and (b) to refrain from deploying deceptive design interfaces that mislead consumers or manipulate their decision-making. The e-commerce platforms, based on the self-audit reports, are also encouraged to give self-declarations that their platform is not indulging in any dark patterns. The self-declarations by the platforms will enable fair digital ecosystem along with building trust between consumers and e-commerce platforms.

Extension of validity of the no objection certificate for the alcoholic beverages bottled in origin and in bulk³

The Food Safety and Standards Authority of India ("FSSAI") has revised the validity of No Objection Certificate ("NOC") issued as per the FSS (Import) Regulations, 2017 for alcoholic beverages, to facilitate ease of doing business while ensuring the safety of food imported into India. Therefore, the NOC for imported consignments of alcoholic beverages bottled in origin and in bulk, containing more than 10% alcohol, which does not have an expiry date, will have a validity of 365 (three hundred and sixty-five) days. For consignments lying at ports customs area beyond 365 (three hundred and sixty-five) days, on payment of visual inspection fee, visual inspection may be carried out for revalidation.

Food Safety and Standards (Alcoholic Beverages) first Amendment Regulations, 2025⁴

FSSAI, has amended the Food Safety and Standards (Alcoholic Beverages) Regulations, 2018 ("Principal Rules"). Some of the key amendments are as follows:

1. the term 'alcoholic ready-to-drink beverages' is inserted to mean, flavored beverages having more than 0.5 and up to 15.0% of alcohol by volume, made from spirit or the mixture of spirit or any alcoholic beverage as base by adding natural or nature identical or artificial flavors and food additives permitted under the Food Safety and Standards (Food Product Standards and Food Additives) Regulations, 2011, or a combination thereof, and fruit or

¹ PIB, Release ID: 2137428, dated June 18, 2025.

² Circular no. - CCPA-1 /1 /2023-CCPA, dated June 5, 2025, and PIB, Release ID: 2134765, dated June 07, 2025

³ File no. - TIC-B05/1/2021-IMPORTS-FSSAI, dated June 13, 2025.

⁴ Notification no. - CG-DL-E-24062025-264085, dated June 23, 2025.

vegetable juice or herbs or spices, or a combination thereof, with or without added sugar or caloric sweeteners or salt and with or without carbonation. In case of carbonated alcoholic ready-to-drink beverages, they must be carbonated with carbon dioxide, which must have a minimum of one volume of carbon dioxide and must conform to the requirements of TABLE-4 of the Principal Rules;

2. alcoholic beverage containing more than 0.5% abv and up to 15.0% abv will be called as alcoholic ready-to-drink beverage and it must conform to the definition provided under regulation 1.2 and the requirements of TABLE-4 of the Principal Rules;
3. Country Liquors and Indian Liquors related provisions along with distinction between 'Plain country liquor or Plain Indian liquor' and 'Blended country liquor or Blended Indian liquor' has been provided; and
4. the term 'Honey wine or Mead' is inserted to mean a wine produced from the fermentation of an aqueous solution of honey by yeasts without addition of any other carbohydrate source. It may contain herbs, spices or natural flavourings and must conform to the requirements provided under Table-2 of the Principal Rules except ethyl alcohol content which may vary between 4% to 15.5%.

These regulations will come into force on January 1, 2026.

Food and Consumer Sector

The food and consumer practice at JSA has vast expertise across the entire value chain, offering guidance on all aspects of operations, from farm to table (for food and beverages), and origin to end use (for consumer space). Our work in this sector covers a wide range of areas, including both domestic and international investments, mergers and acquisitions, initial public offerings, joint ventures, litigation, corporate matters, real estate issues, and technology licensing, among others.

We advise a diverse range of industry participants, such as companies in food and beverage production, processing, and distribution, manufacturers of agrichemicals, agricultural commodity processors, producers of precision farming equipment, as well as banking and financial institutions.

With offices across India, our team delivers a seamless, comprehensive service to clients navigating the growing challenges in the food and beverages sector, such as increasingly complex regulatory requirements, supply chain issues, ESG concerns, and the enforcement and protection of trade secrets and other intellectual property.

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18 Practices and
41 Ranked Lawyers



7 Ranked Practices,
21 Ranked Lawyers



14 Practices and
12 Ranked Lawyers



12 Practices and 50 Ranked
Lawyers



20 Practices and
22 Ranked Lawyers



8 Practices and
10 Ranked Lawyers
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competition practices of 2025



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14 Ranked Practices



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