

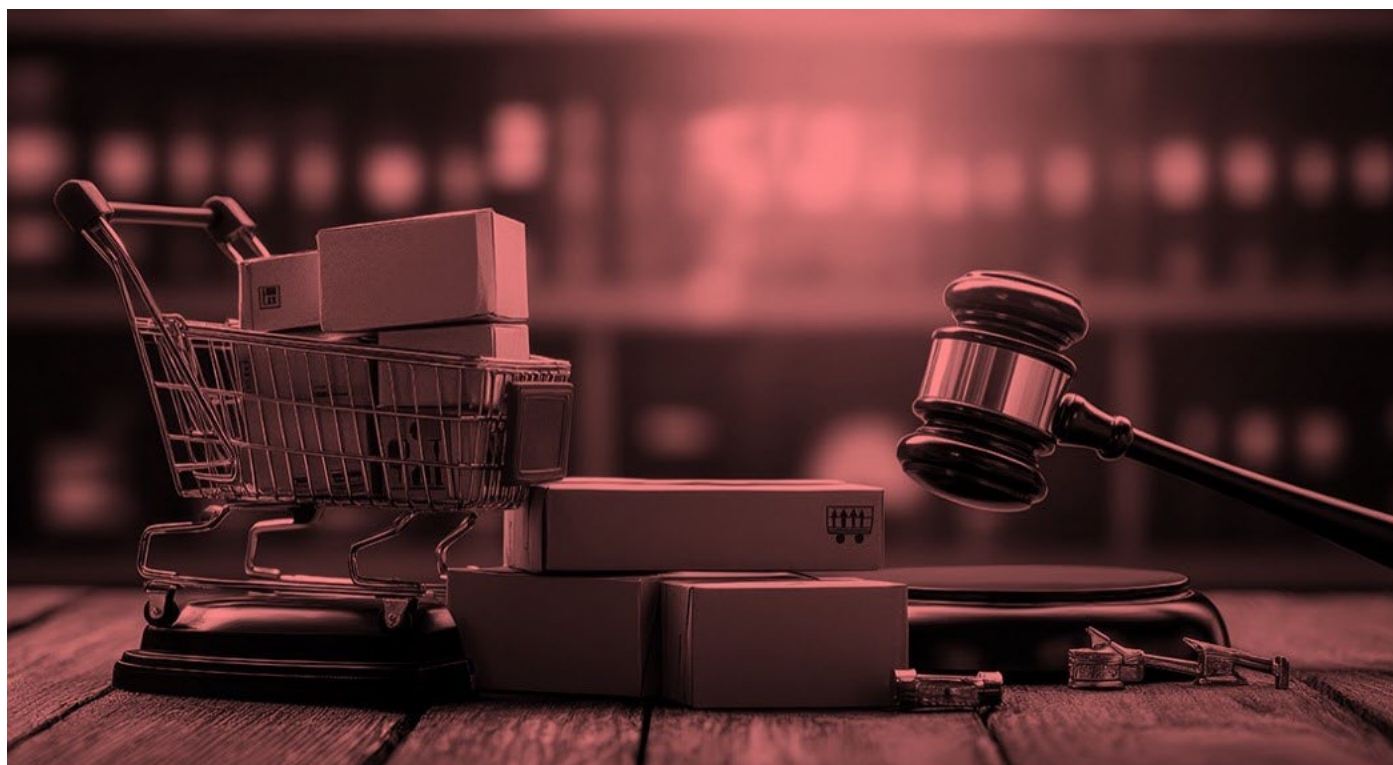


## **Knowledge Management**

### **Semi-Annual Food and Consumer Protection Compendium 2025**

January – June 2025

# Semi-Annual Food and Consumer Protection Compendium 2025



## Introduction

The Budget for 2025-2026 introduced development measures across 10 (ten) broad areas, with a strong focus on the *Garib*, youth, *Annadata* (farmers), and *Nari* (women). The Government announced several initiatives for the farmers, including the launch of the *Prime Minister Dhan-Dhaanya Krishi Yojana* to boost agricultural productivity, promote crop diversification, and improve storage and irrigation facilities, alongside enhanced access to credit. A 6 (six) year mission for self-reliance in pulses, particularly *tur*, *urad*, and *masoor*, will emphasise climate-resilient seeds, higher protein content, and better post-harvest management. Comprehensive programmes were proposed for vegetables and fruits, such as the establishment of a Makhana Board in Bihar, and a national mission on high-yielding seeds, aiming to strengthen research, improve productivity, and ensure remunerative prices for farmers. The loan limit under the Modified Interest Subvention Scheme for Kisan Credit Cards has been raised from INR 3,00,000 (Indian Rupees three lakh) to

INR 5,00,000 (Indian Rupees five lakh), and a National Institute of Food Technology, Entrepreneurship and Management will be set up in Bihar to support food processing and create opportunities for youth. Customs duties have been reduced on key inputs for the food and fisheries sectors, further supporting the industry growth.

India has also introduced significant regulatory changes in the food and consumer sectors, focusing on food safety, labelling transparency, and consumer awareness. The Food Safety and Standards Authority of India (“**FSSAI**”) has proposed amendments to vegan food regulations, requiring clearer certification and production protocols. Under the *Pradhan Mantri Kisan Sampada Yojana*, the Ministry of Food Processing Industries (“**MoFPI**”) is establishing 100 (one hundred) new National Accreditation Board for Testing and Calibration Laboratories (“**NABL**”)-accredited food testing laboratories in 2025-26 to support exports, ensure compliance with global standards, and create jobs for skilled personnel. These



labs will help meet the requirements of both domestic and international regulatory bodies.

To further ensure food safety, the FSSAI directed all States and Union Territories in March 2025 to intensify surveillance on dairy analogues during the festive season, aiming to prevent adulteration and mislabelling. State authorities were instructed to conduct rigorous testing and label checks to protect consumers. On the trade front, India has made notable progress, finalising the United Kingdom –India Free Trade Agreement in May 2025, which will phase out tariffs on various goods, including food and beverages. Parallel negotiations are ongoing with the United States and the European Union to safeguard the food and farm sectors. At the state level, Andhra Pradesh has reduced Urban Development Authority fees for rural food-processing units to encourage investment.

Additionally, the Government has taken steps to control edible oil prices by reducing import duties and ensuring that refiners pass on the benefits to consumers, with early signs of price relief.

This Compendium consolidates the key regulatory updates, notifications, and developments in the food and consumer protection sector, which were circulated as JSA Newsletters/Prisms during the calendar period from January 2025 till June 2025.



## Regulatory Updates

### Timeline for the compliance of amendments in labelling provisions

The FSSAI, in its 45th meeting, set key timelines for implementing amendments to labelling provisions under the Food Safety and Standards Regulations, 2011 (“**FSS Regulations**”). The enforcement date for amendments related to the Food Safety and Standards

(“**FSS**”) (Labelling and Display) Regulations, 2020 (“**FSSLD**”), as well as any other labelling changes under other FSS Regulations, is set for July 1, 2025, with a minimum compliance window of 180 (one hundred and eighty) days from the date of notification for the amendments related to the FSSLD. Additionally, in case of emergency situations, the implementation and enforcement of these amendments may be decided on a case-by-case basis. These measures aim to facilitate a smooth transition for businesses while upholding food safety standards. Given the timelines at hand, companies would need to calculate backwards for their preparedness, from an operational as well as compliance planning perspective.

### Revised open market sale scheme (domestic) policy

MoCA, *vide* press release, dated January 17, 2025, announced the key revisions in the open market sale scheme (domestic) policy for the year 2024-25. Pursuant to the revisions the reserve price of rice is fixed at INR 2,250 (Indian Rupees two thousand two hundred and fifty) per quintal for sale to State Governments, State Government kitchens and community kitchens, without the requirement to participate in e-auctions. The reserve price of rice for sale to ethanol distilleries for the production of ethanol has also been fixed at INR 2,250 (Indian Rupees two thousand two hundred and fifty) per quintal. It must be noted that viable ethanol production is being viewed as part of the national energy strategy, which has wider ramifications reaching even the automotive and auto-components sectors.

### Expansion in the scope of trade under electronic national agricultural market platform

To increase the coverage of agricultural commodities and offer more opportunities for farmers and traders to benefit from the digital trading platform, MoAFW, *vide* press release dated February 6, 2025, expanded the e-NAM platform to boost agricultural trade with the addition of 10 (ten) new commodities, such as, dried Tulsi leaves, *besan* (chickpea flour), wheat flour, chana *sattu* (roasted chickpea flour) etc., and their tradable parameters. Pursuant to the new inclusions, the number of commodities on e-NAM platform stands at

231 (two hundred and thirty-one) (*previously this was 221 (two hundred and twenty-one)*). While e-NAM has faced some logistical hurdles in the past, the pan-India/inter-state trade made possible by it (and more mandis being linked on an ongoing basis), better price discovery and greater price stability for consumers is expected.

Further, to address logistics challenges in promotion of inter-state and inter-mandi trade under e-NAM, the Ministry of Agriculture & Farmers Welfare (**"MoAFW"**), *vide* PIB release dated March 18, 2025, decided to upgrade e-NAM platform as e-NAM 2.0, which will facilitate the onboarding of various logistic service providers. The objective of this initiative is to overcome logistic gaps and enable faster trade, reduced wastage and better farmer incomes. Further, the existing e-NAM platform will be upgraded to make it more efficient, robust, user-friendly, inclusive, scalable and open-network compliant. The main features of e-NAM 2.0 would be bank account validation, electronic know your customer features using Aadhaar and onboarding of assaying, logistics and other value-added service providers.

### Credit guarantee scheme for electronic Negotiable Warehouse Receipt based pledge financing

The Central Government approved the Credit Guarantee Scheme for electronic - Negotiable Warehouse Receipt (**"e-NWR"**) based pledge financing (**"CGS-NPF"**) as a Central sector scheme for the purpose of providing credit guarantees to loans extended by Eligible Lending Institutions (**"ELIs"**) to finance e-NWR based pledge loans. MoCA, *vide* notification dated February 13, 2025, issued the CGS-NPF scheme operational guidelines, covering the pledge loans extended on the e-NWRs issued against agricultural and horticultural commodities. The credit facilities satisfying the following criteria are eligible for coverage under the CGS-NPF scheme:

1. loans extended by ELI to eligible borrowers against e-NWRs under agriculture credit as per the Reserve Bank of India (**"RBI"**) Master Directions on Priority Sector Lending subject to a maximum amount of INR 75,00,000 (Indian Rupees seventy-five lakh);
2. loans extended by ELI to eligible borrowers against e-NWRs to micro, small and medium enterprises as

per RBI Master Directions on Priority Sector Lending and to farmers including small and marginal farmer, FPOs and other farmer cooperatives, subject to a maximum amount of INR 2,00,00,000 (Indian Rupees two crore);

3. the interest rate charged by the ELIs for loans against e-NWRs covered under CGS-NPF scheme should be maximum up to 3% per annum over and above the Marginal Cost Lending Rate (**"MCLR"**) where it is applicable. For cooperative banks where MCLR is not applicable, the rate of interest may be capped at 1% below the average lending rate to the targeted segment. However, the management committee may revise such ceiling from time to time keeping in view the prevailing interest rate scenario, reference rates of lending institutions and RBI's credit policies; and
4. ELI must not take any collateral other than the goods mentioned in the e-NWR.



### Introduction to Administrator Warehouse Service provider

To offer the administrative overview and facilitate the managerial function in certain circumstances, the MoCA, *vide* notification dated February 17, 2025, issued the Warehousing (Development and Regulation) Registration of Warehouses (Amendment) Rules, 2025, amending the Warehousing (Development and Regulation) Registration of Warehouses Rules, 2017. In line with the amendment the concept of 'Administrator Warehouse Service Provider' (**"AWSP"**) is introduced to mean, an entity or person or warehouseman appointed by the authority under Rule 35 (*power of authority in the event of potential loss to negotiable warehouse receipt holders*) to take control, manage or liquidate goods in specific cases. The AWSPs appointed under Rule 35 are exempted from certain registration requirements under Rule 16 (*fit and proper person*).

## Mandatory update of Form IX nominee details by FBOs

FSSAI, *vide* circular dated February 18, 2025, issued a directive to all FBOs regarding the mandatory update of Form IX nominee details, along with the introduction of an auto-approval provision for certain modifications in the FoSCoS. For context, the nominee in this case is the person in charge of an establishment/branch/unit, having responsibility and liability for food safety and contraventions at such establishment/branch/unit. All FBOs must ensure that the authorities always have accurate and current information regarding their food business, including any changes in the details provided in Form IX. It is reiterated that failure to provide updated information to the authority attracts penalties as per Section 58 of the FSS Act, 2006. This penalty can extend up to INR 2,00,000 (Indian Rupees Two Lacs only). Further, effective from Feb 12, 2025, provision is available in the 'Food Safety Compliance System' ("FoSCoS"), for modifying the details of Non-Form C, including modifying Form IX details without requiring the approval/scrutiny of the concerned authority. The Non-Form C modification can be carried out without fee.

## Operational guidelines for the scheme for creation/expansion of food processing and preservation capacities under PMKSY

MoFPI updated the operational guidelines, for creation/expansion of food processing and preservation capacities and expansion of existing food processing units ("**Scheme**"), which were last issued in 2022. The objective of these guidelines is to facilitate the implementation of PMKSY, in the field of food processing and preservation by setting up new units and enhancing the capacities of the existing units.

The Scheme is applicable to fruits and vegetables processing, milk processing, meat/ poultry/ fish processing, ready to eat/ ready to cook food products/ breakfast cereals/ snacks/ bakery and other food products including nutritional health foods, food grains/ pulses, oil seed milling and processing based on modern technology, other agri-horti products including spices and condiments, mushroom processing and honey processing. Activities related to manufacturing of packaged drinking water and farming activities such as dairy farming, poultry

farming, mushroom farming, hatcheries etc., will not be considered for financial assistance under the Scheme.

Under the Scheme, the entities applying for financial assistance are required to submit a non-refundable fee of INR 20,000 (Indian Rupees twenty thousand) and INR 15,000 (Indian Rupees fifteen thousand) for applications from Scheduled Caste and Scheduled Tribe respectively.



## Clarification regarding production of ethanol from sugarcane juice/syrup by standalone distilleries

MoCA, *vide* circular dated February 25, 2025, clarified that distilleries including standalone distilleries are allowed to produce ethanol from sugarcane juice/syrup purchased from sugar mills only (i.e. which are producing sugar from vacuum pan process) for supplying to Oil Marketing Companies ("**OMCs**") under ethanol blended with petrol programme. Distilleries/standalone distilleries are not allowed to procure sugarcane juice/syrup from any jaggery unit to produce ethanol for supplying to OMCs under ethanol blended with petrol programme as jaggery units are not covered under the Sugarcane (Control) Order, 1966.

## Applications for approval of rapid analytical food testing kit by FSSAI

To further outline a streamlined process for manufacturers and method developers to apply for the approval of Rapid Analytical Food Testing ("**RAFT**") kits, equipment, and methods, the FSSAI issued new guidelines dated February 28, 2025, superseding its previous guidelines (*dated October 31, 2023*). Some of the key aspects are as follows:



1. applications can only be submitted through online RAFT portal;
2. In case of incomplete or insufficient data, the applicant will be granted 2 (two) chances for submission or correction of the required data or any rectifications/clarifications in the application. The applicant must submit the information sought for within a period of 30 (thirty) days for technical queries e.g., validation data and 7 (seven) days for non-technical/administrative queries, subject to certain conditions;
3. international manufacturers are encouraged to apply directly. Applications from Indian importers/distributors must include an authorisation letter;
4. in case an overseas manufacturer has an Indian subsidiary, the application will be accepted from the Indian subsidiary only. (Since applications submitted otherwise would get rejected, there is an implication that the Indian entity would have to be ready for the responsibilities associated with this initiative as well;
5. applicants should submit separate application for each kit/equipment/method and each application should be accompanied by separate application processing fee (at INR 2000 (Indian Rupees two thousand) plus goods and service tax at 18% for single rapid food testing kit/equipment/method in a single application form). The fee will be accepted through online RAFT portal only;
6. in case of renewal of RAFT certificate, the applicants must apply for renewal on the online RAFT Portal not less than 60 (sixty) days prior to the expiration date on the certificate (as per the guidelines of renewal procedure); and
7. under the RAFT scheme, application only from commercial manufacturers of the rapid kit/equipment/method will be accepted. In certain circumstances, if the technology is transferred and the kit is manufactured commercially, the manufacturer will have to validate the kit again as per the guidelines and apply to FSSAI.



### Scheme for extending financial assistance to co-operative sugar mills

With the objective to boost the ethanol production capacity, MoCAFPD, *vide* notification dated March 6, 2025, notified a scheme for Cooperative Sugar Mills (“CSMs”) under modified Ethanol Interest Subvention Scheme (“**Ethanol Scheme**”). This Ethanol Scheme proposed for conversion of existing sugarcane-based feedstock ethanol plants into multi-feedstock-based plants to use grains like maize and Damaged Food Grains (“**DFG**”). Under the Ethanol Scheme, a new assistance window is introduced exclusively for CSMs. The support is aimed at helping them convert their existing sugarcane-based ethanol plants into multi-feedstock units capable of processing grains such as maize and DFG. To qualify, mills must already operate an ethanol plant with valid Consent to Operate and a license from the Petroleum and Explosives Safety Organization.

The Central Government will provide an interest subvention at 6% per annum or 50% of the interest rate (whichever is lower) charged by eligible banks/financial institutions for 5 (five) years, including a 1 (one) year moratorium against the loans availed by project proponents, for converting distilleries to multi-feedstock plants. This benefit applies only to loans sanctioned and disbursed for projects approved in principle by the Department of Food and Public Distribution (“**DFPD**”). Interest subvention is available exclusively to CSMs that supply at least 75% of the ethanol produced from the converted distillation capacity into multi-feed plants to oil marketing companies for blending with petrol. The Ethanol Scheme will not be applicable to those CSMs, which have availed benefits under any other scheme of Central Government for the same project.

## Quality control orders for ethylene dichloride, vinyl chloride monomer and polycarbonate

The Ministry of Chemicals and Fertilizers, through separate notifications on March 11, 2025, amended the quality control orders for ethylene dichloride, vinyl chloride monomer, and polycarbonate, extending their implementation date to September 12, 2025 (*previously it was March 12, 2025*). These amendments, made under the Bureau of Indian Standards (“BIS”) Act, 2016, aim to ensure compliance with BIS standards and safeguard public interest by strengthening product quality.

## Clarification on testing standards for in-shell nuts

FSSAI through an office order dated March 13, 2025, clarified that in-shell nuts (like almonds) must be tested by notified food testing laboratories against the standards prescribed for dry fruits and nuts under sub-regulation 2.3.47(5) of the FSS (Food Products Standards and Food Additives) Regulations, 2011. This clarification aims to eliminate ambiguity among stakeholders and ensure consistent application of standards. Some uptick in activity and engagement of companies in the food testing business could be expected as a result.

## FSS (Packaging) First Amendment Regulations, 2025

FSSAI *vide* notification dated March 28, 2025, amended the FSS (Packaging) Regulations, 2018, to permit the use of products made of recycled polyethylene terephthalate for packaging, storing, carrying or dispensing of food products, subject to compliance with notified standards and guidelines (*previously products made of recycled plastics including carry bags was not to be used for packaging, storing, carrying or dispensing articles of food under Regulation 4 (plastic materials intended to come in contact with food products)*).

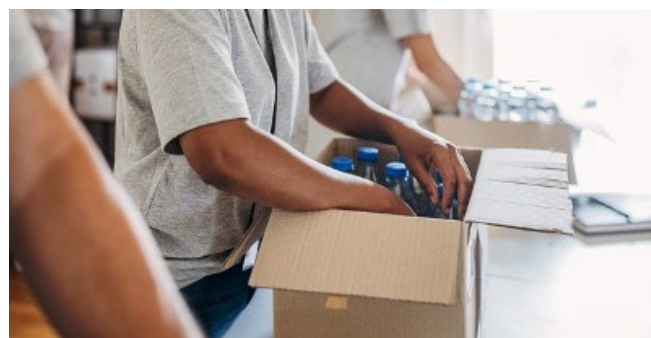
## Use of chloramphenicol and nitrofurans is prohibited in food-producing animals

The Ministry of Health and Family Welfare (“MoHFW”), *vide* notification dated March 12, 2025,

prohibits the import, manufacture, sale and distribution of chloramphenicol as well as nitrofurans and its formulations drugs, for use in any food producing animal rearing system, with immediate effect, to protect public health by preventing potential health risks associated with these drugs and their residues in the food chain. Further, it was determined that the use of drug formulations containing chloramphenicol or nitrofurans in food-producing animals poses a risk and that safer alternatives are available.

Subsequently, on April 2, 2025, the MoHFW directed all the State/Union Territories drugs controllers to sensitise their inspectorate staff to keep strict vigil on manufacture, sale and distribution of chloramphenicol and its formulations as well as nitrofurans and its formulations, to prevent use in any food producing animal rearing system and to take necessary action under the provisions of the Drugs and Cosmetics Act 1940 and the rules thereunder.

While both chloramphenicol and nitrofurans are cost effective options as antibiotic and anti-microbial, and the latter even doubling in some cases as growth enhancers, there are human health risks associated. For context, both of these got prohibited for animal feed use in the USA a few decades back. Dairy and meat producers (a segment that has seen traction in recent years, especially because of quick commerce), would have to pivot to alternate options.



## Reclassification of point related to ‘food grade packaging material’ as ‘critical to food safety’ under inspection checklist

Considering the critical role of food grade packaging material in ensuring food safety, FSSAI, *vide* circular dated April 3, 2025, decided to reclassify the point related to food packaging material as critical in the inspection checklist related to general manufacturing, milk and milk product processing, meat processing, fish and fish products processing and catering. The

packaging material used must be food grade, in sound condition and must have a certificate of conformity issued by an NABL accredited laboratory against the FSS (Packaging) Regulations, 2018 (*previously the criteria for packaging materials was, that they must be of food grade and in sound condition*). The revised scoring is 4 (four) (*previously the scoring was 2*) for all items.



### Jute packaging mandates

The Ministry of Textiles, *vide* notification dated April 22, 2025, directed that the commodities such as foodgrains (including rice, paddy and wheat) and sugar must be packed in jute packaging material for supply or distribution. From April 22, 2025, till June 30, 2025, 100% of the total produced foodgrains and 20% of the total produced sugar are required to be packed in jute packaging material manufactured in India from raw jute produced in India. The following may be kept out of the purview of reservation under the Jute Packaging Materials (Compulsory Use in Packing Commodities) Act, 1987, such as:

1. sugar fortified with vitamins;
2. packaging for export of commodities;
3. small consumer packs of ten kilograms and below for foodgrains and twenty-five kilograms and below for sugar;
4. bulk packaging of more than 100 kg (one hundred kilograms); and
5. sugar packed for export but which could not be exported based on an assessment and recommendation by the DFPD.

The DFPD must communicate in advance the month-wise projection of required quantity of jute bags for packing of foodgrains and in case of any shortage or disruption in supply of new jute packaging material or

in other contingency or exigency, the Ministry of Textiles may, in consultation with the prescribed committees, relax these provisions up to a maximum of 30% (foodgrains are at 100% and sugar is at 20%, therefore, 30% of 100% and 30% of 20%, respectively). The jute mills benefitting from the above arrangements are required to implement the relevant provisions of labour laws and regulations on the subject to the satisfaction of the State Governments concerned and must certify prompt payment to jute farmers and balers on production of raw jute.

### Operational guidelines for creation of infrastructure for agro processing clusters

To provide integrated and complete preservation infrastructure facilities from farm gate to the consumer, the MoFPI, issued a circular dated April 25, 2025, to update the previous operational guidelines of the Scheme for Creation of Infrastructure ("**Infrastructure Scheme**") for agro processing clusters under the PMKSY. The Infrastructure Scheme aims to create modern infrastructure for food processing closer to production areas and to provide effective linkages by linking groups of producers/farmers to food processors and markets through well-equipped supply chain. It is implemented in the areas of horticulture/agriculture production identified through a mapping exercise. These clusters aim to reduce the loss of surplus produce and add value to the horticultural/agricultural produce which will result in increase of income of the farmers and create employment at the local level.

A plan that has been in the build for 3 (three) years, and presents an opportunity for players in the agri-business, food processing tech, as well as supply chain and logistics management companies.

### FSSAI empowers consumers to report misleading claims on food products

Empowering the consumers, the FSSAI, through a press release dated April 30, 2025, introduced a new digital utility that enables consumers to directly report misleading claims made on food product labels. Consumers can now lodge complaints regarding misleading or false claims displayed on packaged food items through the 'Food Safety Connect' mobile



application or *via* FoSCoS. The new reporting mechanism strengthens ground-level vigilance by encouraging consumers to act as the eyes and ears of the food safety authority. FSSAI encourages all citizens to actively participate in this initiative to ensure honesty in food labelling and contribute to building a healthier and well-informed India.

### Recognition of National Food and Feed Reference Laboratory

The FSSAI recognises the National Food and Feed Reference Laboratory (“**NFFRL**”), Kathmandu, Nepal, for the analysis of food samples under the FSS Regulations, till the period of approved by NABL. The analysis certificates issued by NFFRL will be accepted in India dealing with food imports. The food products included are - juice, jam, jelly, pickles, candies, ginger, fresh fruits, fresh vegetables and instant noodles.



### Depot Darpan portal and mobile application

Launched by the MoCAFPD on May 20, 2025, the Depot Darpan Portal (“**DDP**”) and mobile application aim to create a seamless digital monitoring ecosystem which will include closed-circuit television (CCTV) surveillance and internet of things (IoT) sensors, monitoring key parameters such as carbon dioxide levels, phosphine levels, fire hazards, humidity, unauthorised entry and temperature of the food grain storage/warehouse.

The DDP mobile app is designed to offer easy and real time track of the performance of a registered warehouse to the supervisory officials these reports may facilitate to improve infrastructure and efficiency of warehouses. At present, the focus is on warehouses that are owned by Food Corporation of India, Central Warehousing Corporation (being central government)

along with warehouses hired by the MoCAFPD from states and from private parties.

### Streamlining the regulatory framework for the sugar sector

MoCAFPD through a notification dated May 1, 2025, issued the Sugar (Control) Order, 2025, replacing the Sugar (Control) Order, 1966, and the Sugar Price (Control) Order, 2018. The new framework modernises and consolidates regulations governing the sugar sector. It introduces clear classifications for various types of sugar and related products, updates quality standards, and provides a structured approach to the categorisation of molasses. Significantly, the order enhances the regulatory powers of the Central Government, including control over production, diversion, sale, and storage of sugar, as well as the use of sugar-based feedstock for ethanol and other products. This is expected to bring greater transparency, standardisation, and oversight across the sugar supply chain.

### Mandatory submission of closure report on expiry of FSSAI license/registration

As a part of efforts to strengthen regulatory compliance, transparency and traceability in the licensing framework, the FSSAI, through order dated May 16, 2025, directed all FBOs, whose FSSAI license/registration is expired during financial year 2024-25, to mandatorily submit a closure report.

This report must confirm that no food business activity is being conducted at the respective premises on the expired FSSAI license/registration number or else, food businesses must confirm whether new license/registration is obtained. FBOs are also required to provide specific reasons for non-renewal of the FSSAI License. Further, for all future cases, when FSSAI license/registration gets expired, the FBO is directed to submit the reasons for closure of business/non-renewal of license/registration, through the FoSCoS portal. Further, operating a food business on expired FSSAI license/registration is a violation of Section 31 of the FSS Act, 2006, that attracts a penalty of INR 10,00,000 (Indian Rupees ten lakh). Therefore, FBOs must maintain a valid email ID registered with the FoSCoS portal, to receive the ‘notice for closure of food business’ in case of expiry of FSSAI license/registration. The order also prescribes the procedure to be followed by the FBOs for filing the

reasons of non-renewal of license/registration on the FoSCoS portal.



### Monitoring the sale of fresh fruits for use of unauthorised or prohibited artificial ripening agents

To accelerate the ripening process and meet growing consumer demand of fruits, especially mangoes, papayas and bananas, some FBOs are resorting to using unauthorised or prohibited chemical agents such as calcium carbide (commonly referred to as '*masala*')/ acetylene gas etc., for artificial ripening. The use of calcium carbide for ripening poses serious health hazards to consumers such as - mouth ulcers, gastric irritation and even cancer due to its carcinogenic properties. The use of '*masala*' as a ripening agent is prohibited under Regulation 2.3.5 of the FSS (Prohibition and Restrictions on Sales) Regulations, 2011.

FSSAI after identifying cases where FBOs were using ethephon solution to artificially ripen bananas and other fruits by dipping them directly into the chemical and have issued a comprehensive guidance dated February 10, 2020, titled 'Guidance note on Artificial Ripening of Fruits –Ethylene Gas: A Safe Fruit Ripener' ("**SOP Guidelines**"), which clearly states that ethephon may be used as a source for generating ethylene gas only if used in accordance with the prescribed SOP Guidelines. The SOP Guidelines strictly prohibits any direct contact between ethylene (in powder or liquid form) and the fruits/vegetables. The prevalence of other malpractices such as colouring or coating of fruits with synthetic colours or non-permitted wax is also been observed by FSSAI.

Therefore, to curb and check the illegal use of calcium carbide or other non-permitted ripening and unsafe

practices followed by certain FBOs, FSSAI, *vide* circular dated May 16, 2025, directed the commissioner of food safety of all States/Union Territories and all Regional Directors of FSSAI to intensify inspections and maintain strict vigilance over fruit markets/mandis and conduct special enforcement drives within their respective jurisdictions. The special enforcement drives will cover godown where seasonal fruits are stored and are suspected to be using '*masala*' for ripening. The enforcement official may also use strip paper tests to detect the presence of acetylene in godowns or ripening chambers for the artificial ripening of fruits.

Thereafter, on May 18, 2025, the MoHFW through a press release alerted traders/fruits handlers/FBOs operating ripening chambers to strictly ensure compliance with the prohibition on calcium carbide for artificial ripening of fruits, particularly during the mango season. To help eradicate the extensive use of banned calcium carbide, FSSAI permitted the use of ethylene gas as a safer alternative for fruit ripening in India through the SOP Guidelines. According to the SOP Guidelines, ethylene gas can be used at concentrations up to 100 ppm (one hundred parts per million) (100 µl/L (one hundred micro liter per liter)), depending upon the crop, variety and maturity.

Subsequently, on May 20, 2025, FSSAI by a press release urged all States and Union Territories to intensify inspections and carry out special enforcement drives to curb the illegal use of non-permitted fruit ripening agents, as well as colouring and coating of fruits with synthetic colours or non-permitted wax. All FBOs must adhere to the SOP Guidelines to ensure safe and compliant ripening practices. Any violation of these norms will attract strict penal action under the FSS 2006.

### Use of recycled plastics in food packaging

FSSAI, *vide* notification dated May 23, 2025, issued the guidelines for acceptance of recycled Polyethylene terephthalate ("**PET**") as Food Contact Material ("**FCM-rPET**") ("**FCM Guidelines**"). The FCM Guidelines outlines the definitions, process requirements, acceptance criteria for FCM-rPET resin in FCM, marking and labelling of FCM, documentation, and authorisation procedures for transforming post-consumer PET into FCM-rPET resins suitable for FCM.

The FCM Guidelines pertain only to the recycling process/operation of transforming post-consumer PET used for food applications into FCM-rPET resins suitable for making FCM. Some of the key provisions of the FCM Guidelines are:

1. the FCM Guidelines are only applicable to recycling technology approved by FSSAI and does not apply to production of resins for non-food grade consumer applications;
2. it outlines 4 (four) different process of recycling – ‘Super-Clean Recycling Process’, ‘Melt-in Recycling Process’, ‘Paste-in Recycling Process’ and ‘Chemical Recycling Process’, which are capable of producing recycled PET as FCM, and any 1 (one) of them can be adopted. The recycling process adopted must have a decontamination step capable of removing contaminants to a level of purity suitable for food contact; and
3. the process input will be sourced in accordance with the minimum quality standard on FCM-rPET resin. Input materials must be controlled based on process validation criteria as identified by performance of the challenge test.



### Guidelines to control illegal listing and sale of radio equipment on e-commerce platforms

On May 27, 2025, the Central Consumer Protection Authority (“CCPA”) issued the Guidelines for Prevention and Regulation of Illegal Listing and Sale of Radio Equipment including Walkie Talkies on E-Commerce Platforms, 2025 (“Guidelines”). These Guidelines are intended to reinforce compliance with existing telecom laws and ensure that radio frequency

devices sold online conform to the licensing and technical requirements laid down by the Wireless Planning and Coordination (WPC) wing.

### Compliance requirements for e-commerce platforms and sellers

E-commerce platforms are prohibited from listing or selling radio equipment that requires a frequency assignment from the Department of Telecommunications (“DoT”) for lawful use. Such equipment can only be purchased from DoT-authorized dealer possession authorisation holders listed on the Saral Sanchar portal. Online platforms will also strictly prohibit the listing or sale of mobile signal boosters and wireless jammers.

### Product listing regulations

Product listings must include the below mentioned technical specifications, such as operating frequency ranges, and provide proof of regulatory approval, including Equipment Type Approval (“ETA”). All listings must clearly state the operating frequency range and include valid regulatory approvals, particularly the ETA issued by DoT:

1. for equipment operating only in unlicensed frequency bands (e.g. wi-fi, bluetooth), listings must, (a) mention the ETA details; (b) provide a downloadable copy of the ETA; and (c) include a test report from an accredited lab;
2. for equipment using licensed bands but exempt from individual user licences (e.g. broadcast receivers), listings must show the relevant DoT or Directorate General of Foreign Trade notification number and date; and
3. for dual-band devices (e.g. mobile phones, point of sale machines), both sets of requirements under para 1 and b must be met.

Sellers of license-exempt equipment must certify that:

1. the device has not been altered to operate beyond ETA parameters; and
2. the test report is genuine and unaltered from the original report prepared by the accredited test laboratory.

Any listing which does not comply with the conditions or the required certification as set out above will be taken down.



## Monitoring and reporting”:

There will be an automated keyword and frequency-based scanning implemented by the platforms to detect non-compliant listings. A user-friendly reporting mechanism for public to report illegal or suspicious listings must be provided.

## Responsibilities of sellers:

Sellers registered with the e-commerce platforms will ensure that the radio equipments listed for sale do not operate on frequencies which are not exempted by DoT; the frequency bands on such radio equipments are clearly labelled; and the laws of wireless communication equipments are complied with in relation to their import, possession, and distribution within the country.

## Responsibilities of e-commerce platforms:

E-commerce platforms will ensure that the sellers of the radio equipment (exempt from license requirements) verify and certify personally that the test report has not been altered from the original report prepared by the accredited test laboratory; and any non-compliant listing are removed from the platform within 24 (twenty-four) hours of receiving directions from the DoT.

## Enforcement and penalties:

Non-compliance of these regulations by such e-commerce platforms or sellers will attract consequences and penalties as per Consumer Protection Act, 2019 and other applicable laws and authorities such as the DoT, including blacklisting of such persistent defaulters.

## Collaboration with regulatory authorities:

E-commerce platforms will cooperate with the regulators to ensure, real-time takedowns and enforcement actions; and regular audits and compliance reports are submitted to the authorities as may be required by law in force.

## Public awareness:

E-commerce platforms will display notices on the risks and legal implications of purchasing unauthorised walkie-talkies and encourage informed consumer behaviour by educating users on frequency compliance.

## Conclusion

The Guidelines issued by the CCPA aims to safeguard consumers and uphold telecom regulations by curbing the unauthorised sale of radio equipment on e-commerce platforms. By mandating strict compliance with licensing, technical approvals, and transparent product listings, the Guidelines reinforce accountability for both sellers and platforms.



## Discontinuation of the term ‘100%’ on food product labels and related promotional materials

FSSAI observed a growing trend in the use of the term ‘100%’ on food, product labels and across various promotional platforms. This terminology is ambiguous, misleading within the current regulatory framework, and is prone to misinterpretation. Consequently, the FSSAI through an advisory dated May 28, 2025, directed all the FBOs to discontinue the usage of the term ‘100%’ on food product labels packaging, and promotional content.

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

CCPA, *vide* circular dated June 5, 2025, issued guidelines to ensure that no one engages in deceptive and unfair trade practice which are in the nature of dark patterns<sup>1</sup>. 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 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 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 bulk

FSSAI, *vide* circular dated June 13, 2025, 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.

## MahaAgri-AI Policy 2025-29

To promote the deployment of hi-tech sophisticated technology in the farm sector, Government of Maharashtra, *vide* PIB dated June 18, 2025, 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 AI 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;

<sup>1</sup> PIB dated June 7, 2025

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 benefits<sup>2</sup>. Most refiners have lowered their prices, and early signs indicate that consumers are beginning to see the benefit.

### FSS (Alcoholic Beverages) first Amendment Regulations, 2025

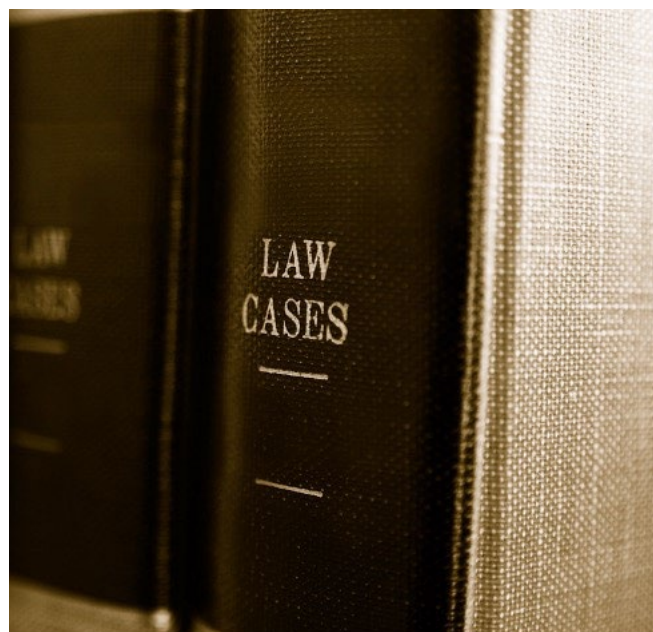
FSSAI, *vide* notification dated June 23, 2025, amended the FSS (Alcoholic Beverages) Regulations, 2018 ("Principal Rules"). Some of the key amendments are as follows:

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 FSS (Food Product Standards and Food Additives) Regulations, 2011, or a combination thereof, and fruit or 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% alcohol by volume ("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' is 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.



### Case Laws

#### The Supreme Court reiterates that in the absence of privity of contract, a complainant cannot be a 'consumer' under the Consumer Protection Act, 1986

The Hon'ble Supreme Court of India ("Supreme Court") in the matter of *M/s. Citicorp Finance (India) Limited vs. Snehasis Nanda*<sup>3</sup> reiterated that without privity of contract between a complainant and respondent, the complainant will not qualify as a

<sup>2</sup>.

<sup>3</sup> 2025 SCC OnLine SC 594



‘consumer’ under the Consumer Protection Act, 1986 (“**CP Act**”). While arriving at its findings, the Hon’ble Supreme Court also reiterated that the mere presence of an arbitration agreement in a contract would not oust the jurisdiction of a consumer court.

### Brief facts

In 2006, the respondent/complainant, Snehasis Nanda (“**Nanda**”) purchased a flat in Navi Mumbai (“**Flat**”) with a housing loan of INR 17,64,664 (Indian Rupees seventeen lakh sixty-four thousand six hundred and sixty-four) from ICICI Bank (“**Bank**”). In 2008, Mr. Mubarak Wahid Patel, the borrower (“**Mubarak**”) approached Nanda to purchase the Flat for INR 32,00,000 (Indian Rupees thirty-two lakh). Nanda and Mubarak entered a memorandum of understanding and agreement for sale for the Flat. On the same day, a purported Tripartite Agreement dated February 9, 2008 (“**Tripartite Agreement**”) which also contained an arbitration clause, was allegedly entered into between Nanda, Mubarak and Citicorp Finance India Limited, the appellant (“**Citicorp Finance**”). Citicorp Finance denied the existence of the Tripartite Agreement. Mubarak approached Citicorp Finance for a housing loan. By a home loan agreement, Citicorp Finance agreed to grant Mubarak a loan amounting to INR 23,40,000 (Indian Rupees twenty-three lakh forty thousand). Since the Flat was already mortgaged with the Bank, Citicorp Finance disbursed an amount of INR 17,80,000 (Indian Rupees seventeen lakh eighty thousand) directly to Nanda’s loan account to secure release of the Flat. For the remaining amount of INR 5,09,311 (Indian Rupees five lakh nine thousand three hundred and eleven), Citicorp Finance issued a cheque in favour of Mubarak which was not encashed by him. Eventually, the loan account of Nanda was closed.

In 2018, Nanda filed a consumer complaint before the National Consumer Disputes Redressal Commission (“**NCDRC**”) *inter alia* seeking compensation from Citicorp Finance for alleged non-payment of INR 13,20,000 (Indian Rupees thirteen lakh twenty thousand) of the purchase price of INR 32,00,000 (Indian Rupees thirty-two lakh) under the alleged Tripartite Agreement. The NCDRC dismissed the complaint at the pre-admission stage, observing that Nanda could not be termed as a ‘consumer’ within the

meaning of the CP Act. A review application filed by Nanda was also dismissed by the NCDRC. Nanda then approached the Hon’ble Supreme Court which set aside the order of dismissal passed by the NCDRC and remanded the matter back to the NCDRC to be decided on merits.

The NCDRC considered the matter on merits and by an order dated January 19, 2023, directed Citicorp Finance to refund INR 13,20,000 (Indian Rupees thirteen lakh twenty thousand) with interest @ 12% per annum along with INR 1,00,000 (Indian Rupees one lakh) towards litigation costs to Nanda (“**Impugned Order**”). Being aggrieved by the Impugned Order, Citicorp Finance preferred an appeal before the Hon’ble Supreme Court (“**Appeal**”).

### Issue

Whether the complainant would come under the definition of ‘consumer’ in terms of the CP Act?

### Findings and analysis

The Supreme Court allowed the Appeal and *inter alia* held as follows:

1. the transaction for the sale of the Flat was solely between Nanda and Mubarak. As such, there was no privity of contract between Nanda and Citicorp Finance. Considering the same, Nanda was not a ‘consumer’ under the CP Act;
2. as held in *India Oil Corporation vs. Consumer Protection Council, Kerala*<sup>4</sup>, and *Janpriya Buildestate Private Limited vs. Amit Soni*<sup>5</sup>, the Hon’ble Supreme Court reiterated that in the absence of privity of contact between the parties, no deficiency of service could be established against Citicorp Finance; and
3. as held earlier in *M Hemalatha Devi vs. B Udayasri*<sup>6</sup> and *Emaar MGF Land Limited vs. Aftab Singh*<sup>7</sup>, even in a consumer dispute under the CP Act or under the Consumer Protection Act, 2019, arbitration as provided under an agreement may be resorted to. However, the exclusive choice of forum would be that of the consumer alone.

<sup>4</sup> (1994) 1 SCC 397

<sup>5</sup> 2021 SCC OnLine SC 1269

<sup>6</sup> (2024) 4 SCC 255

<sup>7</sup> (2019) 12 SCC 751

## Conclusion

The findings in this judgment, particularly, on the issue of privity of contract, would be useful in cases where a party is summarily subjected to proceedings without having any contractual relationship with the complainant. While the judgment was delivered in the context of the CP Act, its import would equally apply to matters under the Consumer Protection Act, 2019.



## Delhi High Court holds mandatory service charges by restaurants to be unlawful

On March 28, 2025, the Delhi High Court (“Dehi HC”) in the significant case of ***National Restaurant Association of India and Ors. vs. Union of India & Anr.***<sup>8</sup> and ***Federation of Hotel and Restaurant Associations of India and Ors.***<sup>9</sup>, in which the main point of contention was whether the collection of mandatory service charges by restaurants and other establishments is permissible under the Consumer Protection Act, 2019 (“CPA 2019”). The dispute stemmed from petitions filed by the National Restaurants Association of India (“NRAI”) and the Federation of Hotels and Restaurants Association of India (“FHRAI”)<sup>10</sup> challenging a set of guidelines issued by the CCPA on July 4, 2022 (hereinafter, the “CCPA Guidelines”).

## Brief facts

1. The CCPA issued the CCPA Guidelines in response to several complaints regarding the levy of service charges by restaurants over and above the cost of food items. The CCPA Guidelines prescribe *inter alia*:
  - a) restaurants or hotels cannot automatically add service charges to a consumer’s bill;
  - b) any service charge must be optional;
  - c) service charge cannot be collected under any other name;
  - d) restrictions cannot be imposed for entry or provision of services based on collection of service charge; and
  - e) Goods and Services Tax (“GST”) cannot be collected on the service charge amount.
2. It should be noted that prior to the issuance of the CCPA Guidelines, several notifications and advisories are issued by the Department of Consumer Affairs and Ministry of Consumer Affairs, Food and Public Distribution to the effect that the levy of service charge is discretionary in nature and that the same must be waived by the restaurants if prompted by the consumer.
3. The Petitioners, claiming to represent the interests of a substantial number of restaurant establishments across the country, have approached the Delhi HC challenging the CCPA Guidelines, praying for issuance of an appropriate writ under Article 226 of the Constitution of India (“Constitution”) and for quashing or setting aside of the CCPA Guidelines.

## Issue

Whether the collection of mandatory service charge by restaurants and other establishments is permissible under the CPA 2019?

## Findings and analysis

The Delhi HC adopted a multi-faceted approach when deciding the issue, examining *inter alia* the jurisdiction

<sup>8</sup> W.P.(C) 10683/2022 & CM APPLs.31033/2022, 45891/2023

<sup>9</sup> W.P.(C) 10867/2022 & CM APPLs.31645/2022, 38599/2022, 23175/2024

<sup>10</sup> The NRAI and FHRAI are collectively referred to as the “Petitioners”.

and authority of the CCPA to issue the CCPA Guidelines; whether the CCPA Guidelines violate the Petitioners' rights under Article 19(1)(g) of the Constitution which recognises the right to practise any profession, trade or business without restriction; and determining the enforceability of mandatory service charges by restaurants and other establishments.

In particular, the following aspects are relevant:

1. the CCPA is the authority fully empowered and has the jurisdiction to pass the guidelines under the CPA, 2019. In fact, issuing guidelines in consumer interest is an essential function of CCPA under Section 18(2)(l) of the CPA, 2019. The said guidelines would have to be mandatorily complied with as the scheme of the CCPA Act clearly provides for enforcement of guidelines. It was also observed that the CCPA dons three hats as designated under the CPA 2019 as a guardian of consumer rights; as an enforcer of consumers' rights; and as an expert body to represent the voice of consumers before consumer commissions;
2. the guidelines issued by the CCPA would not curtail fundamental right to conduct business under Article 19(1)(g) of the Constitution in any manner as the guidelines are in the larger interest of the consumers and are issued in accordance with law. It was clarified that in this case the role of the Delhi HC was to balance the right of restaurant establishments to conduct their business and also the rights of consumers, who are entitled to know the price being charged. As such, the larger interest of the consumer cannot be ignored or stifled in a manner contrary to law;
3. service charge or 'TIP' as is colloquially referred, was a voluntary payment by the customer. It could not be compulsory or mandatory. The practice undertaken by the restaurant establishments of collecting service charge that too on a mandatory basis, in a coercive manner, would be contrary to consumer interest and is violative of consumer rights. Mandatory levy was viewed as a sovereign function in matters such as taxation and service charge by a private party such as a restaurant establishment should not be given the same standing. In particular, where the service charge is double whammy on the consumer as there is a GST amount that the customer is compelled to pay on the service charge;
4. the collection of service charge and use of different terminologies for the said charge is misleading and deceptive in nature. The camouflage and coercive manner of charging service charge demonstrates the unlawful nature of service charge. As such, the same constitutes an 'unfair trade practice' under Section 2(47) of the CPA, 2019;
5. the justification posited on behalf of the Petitioners for collection of service charge, being that they are part of labour settlements and agreements with staff, was not supported by any material on record. Accordingly, the same stood rejected;
6. the fact that service charge can be collected as it is part of a voluntary contract/agreement made by the consumer who enters the establishment and avails of the services after seeing the chargeability of service charge on the menu card is an argument which was also considered as not tenable. It was, instead, deemed to constitute 'unfair contract' under Section 2(46) of the CPA, 2019;
7. consumer rights could not be subjugated to an argument that a contract is being entered into by the consumer while entering the establishment to pay service charge as the payment and collection of service charge is itself contrary to law;
8. if consumers wish to pay any voluntary *tip* for services which they had enjoyed, the same would not be barred. The amount, however, ought not to be added by default in the bill/invoice and should be left to the customer's discretion; and
9. the CCPA may consider permitting change in the nomenclature for service charge which is nothing but a 'tip or a gratuity or a voluntary contribution'. Terminology such as 'voluntary contribution', 'staff contribution', 'staff welfare fund' or similar terminology could be permitted. The use of the word 'service charge' is misleading as consumers tend to confuse the same with service tax or GST or some other tax which is imposed and collected by the government.

Eventually, the writ petitions along with applications by the Petitioners was dismissed, with costs of INR 1,00,000 (Indian Rupees one lakh) each to be deposited with CCPA to be utilised for consumer welfare.

## Conclusion

While in the coming days and months it will be seen if the CCPA takes the route of renaming 'service charge'



as suggested by the Delhi HC, the current implications of this detailed decision by the Delhi HC would be widespread. In the first instance, a common practice by many establishments that have a notice or equivalent within the premises regarding levy or service charge may not be sufficient notice, especially if the invoice automatically includes the same. Given that the Delhi HC has frowned upon this practice, the practice of omitting the service charge and submitting a revised invoice after the customer has requested exclusion of

service charge may also not be compliant action. Enforcement of the positions taken by the Delhi HC remains the biggest challenge for the CCPA of course, even as some restaurant establishments may revise prices in their menu card upwards in lieu of excluding the service charge component. In any event, it will also have to be seen if the CCPA focuses on implementing this position in Delhi in the first instance because of the Delhi HC's order, though the CCPA Guidelines are applicable across India.



## 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  
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14 Practices and  
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