



Knowledge Management

Semi-Annual Food and Consumer Protection Compendium 2025

July – December 2025

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Introduction

The India–United Kingdom (“**UK**”) Comprehensive Economic and Trade Agreement (“**CETA**”) marks an important milestone for India’s agriculture and food processing sector in the second half of 2025. By removing tariffs on a wide range of products, CETA provides duty-free access for Indian exports to boost exports to the UK by nearly 20% over the next 3 (three) years and contribute to India’s broader target of reaching USD 100 billion (US Dollar one hundred billion) in agricultural exports by 2030. India bound tariff barriers are to be lowered for UK exports of whiskeys and some other spirits. CETA protects certain sensitive areas of Indian food-agri sector, ensuring a balance between global trade opportunities and domestic interests. Overall, the CETA should act as a foundation for more cross-border partnerships, collaborations & joint ventures, and business expansion (especially brownfield).

Alongside trade developments, strong regulatory action is being taken to reinforce food safety and consumer protection in the domestic market,

particularly in the growing e-commerce food segment. A high-level meeting between the Food Safety and Standards Authority of India (“**FSSAI**”) and leading online platforms focused on tightening standards across the supply chain. Platforms were directed to clearly display license or registration numbers on all receipts and invoices, update and disclose warehouse information on the Food Safety Compliance System (“**FoSCoS**”) portal, upload photographs to demonstrate hygiene compliance, ensure expiry/use-by dates are visible at the consumer interface, and mandate training and certification for all food handlers through the Food Safety Training and Certification (“**FoSTaC**”) programme. They were also reminded to comply fully with the Food Safety and Standards (“**FSS**”) Act, 2006, and warned of strict action for lapses in adherence.

At the policy level, the Ministry of Agriculture & Farmers Welfare (“**MoAFW**”) rolled out a comprehensive roadmap to ensure sustainable growth in farming. Priorities include improving crop productivity, lowering costs, securing fair prices for farmers, diversifying production, strengthening post-harvest value chains, and enhancing climate resilience

to reduce crop losses. Reflecting these efforts, provisional estimates from the Ministry of Statistics and Programme Implementation through the National Statistics Office indicate that the agriculture and allied sectors are set to grow at 4.6% Gross Value Added in 2024–25, highlighting the sector's stability and potential.

To further strengthen consumer confidence, FSSAI introduced new standards for meat sausages, updated specifications for food additives, and intensified enforcement actions and inspecting more than 8,000 (eight thousand) e-commerce food storage facilities. Collectively, these developments signal a stronger push towards building safer, more transparent, and globally competitive food systems in India.

In September 2025, the Government of India rationalised the Goods and Services Tax (“GST”) slabs, pursuant to which the Indian food sector emerged as a major beneficiary, with most products now falling under the 5% GST slab. The tax rationalisation, among others, facilitated the growth of Indian food and consumer sector. Continuing with sentiment to boost food export, the Agricultural and Processed Food Products Export Development Authority (“APEDA”), *vide* press release dated PIB dated September 2, 2025, launched BHARATI (Bharat's Hub for Agri-tech, Resilience, Advancement and Incubation for Export Enablement), aiming to empower 100 (one hundred) agri-food and agri-tech startups, foster innovation, and create new export opportunities to help achieve APEDA's target of USD 50,000,000,000 (US Dollars fifty billion) in agri-food exports for its ‘Scheduled Products’ by 2030. This was a pilot run for 3 (three) months to serve as a model for a long-term, scalable incubation framework to drive continuous innovation and growth in India's agricultural and processed food exports. Interestingly, aligning with the Finance Minister's budget proposal, the MoAFW *vide* notification dated September 14, 2025, notified the formation of National Makhana Board (“NMB”) in Bihar with the primary objective to improve production, processing, value addition, marketing and export promotion of *makhana*.

On October 14, 2025, FSSAI through a press release, instructed all States and Union Territories (“UTs”) to ensure the efficient utilisation of installed High-End Equipment and to obtain National Accreditation Board for Testing and Calibration Laboratories (“NABL”) accreditation for their food laboratories. This step is

critical for ensuring greater reliability, uniformity, and scientific robustness in food sample testing nationwide.

This Compendium consolidates all the key developments undertaken in the food and consumer protection sector which were circulated as JSA Newsletters/Prisms during the calendar period from July 2025 till December 2025.



New 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 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 is not 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 (a) the radio equipments listed for sale do not operate on frequencies which are not exempted by DoT; (b) the frequency bands on such radio equipments are clearly labelled; and (c) 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 (a) the sellers of the radio equipment (exempt from license requirements) verify and certify personally that the test report is not altered from the original report prepared by the accredited test laboratory; and (b) any non-compliant listing is removed from the platform within 24 (twenty-four) hours of receiving directions from DoT.

Enforcement and penalties

Non-compliance 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 DoT, including blacklisting of such persistent defaulters.

Collaboration with regulatory authorities

E-commerce platforms will cooperate with the regulators to ensure: (a) real-time takedowns and enforcement actions; and (b) 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 CCPA aim 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.

Public utility services

To ensure uninterrupted supply of essential goods and maintain industrial harmony, the Central Government *vide* notification dated July 1, 2025, declared the industries engaged in food stuffs which is covered under item 6 of the First Schedule to the Industrial Disputes Act, 1947, to be a public utility service for a further period of 6 (six) months with effect from July 1, 2025.



Amendment made to the food product standards

FSSAI, *vide* notification dated July 14, 2025, issued the FSS (Food Products Standards and Food Additives) First Amendment Regulations, 2025, amending the FSS (Food Products Standards and Food Additives) Regulations, 2011. These will come into force on February 1, 2026. Some of the key amendments are as follows:

1. the refractive index at specified temperatures for several edible oils, such as palm oil, palmolein, palm kernel oil and palm superolein, are modified;
2. Clause 2A is added to Regulation 2.5.2 (meat and meat products - comminuted or restructured meat products), which lays a comprehensive new

standard for meat sausages (fresh or cooked). The clause details the standards, preparation, processing and storage requirements of fresh or cooked meat sausages. Detailed procedures for mincing, emulsification, stuffing, linking, cooking (to 75°C internal temp for cooked sausages), cooling, chilling, and freezing (to -18°C or lower for frozen) are specified. Storage temperatures of 4°C for fresh/chilled and -18°C or lower for frozen sausages are mandated. India has a growing market of frozen, fresh and ready to eat supply of meats by e-commerce entities. These changes would be of interest to them as well as any back-to-back service providers they engage;

3. new standard is inserted for both dehydrated tarragon, whole and dehydrated tarragon, powder. The new clause details the definition, compositional requirements as well as the chromatographic requirements for tarragon;
4. provisions relating to preparation of food colours are amended. The standards for 'food colour – preparation and mixtures' are revised. The new clause specifies that these preparations, containing 1 (one) or more permitted food colours, must conform to prescribed standards and may include specific diluents or filler materials (a comprehensive list of 29 (twenty-nine) permitted diluents/fillers is provided);
5. requirements for solid and liquid preparations, and total dye content declarations on labels, are also detailed; and
6. new enzymes derived from genetically modified microorganisms are added to Table 11A.

Copper limits in hops pellets

On July 14, 2025, FSSAI withdrew their order dated October 28, 2022 ("**2022 Order**"), regarding copper limits in hops pellets, which are used in brewing beers. All imported consignments of hops pellets will follow the copper limits of 'foods not specified' category under the FSS (Contaminants, Toxins and Residues) Regulation, 2011 i.e. 30 (thirty) milli gram/kilo gram; as distinguished from the 1000 (one thousand) parts per million, that was the standard per the European Food Safety Authority, to which the 2022 Order mandated adherence.

Display of food safety connect mobile app Quick Response code/download link at food premises

To strengthen food safety surveillance and consumer empowerment, FSSAI through an advisory dated July 25, 2025, developed a user-friendly platform, called 'Food Safety Connect App', that allows consumers to:

1. lodge complaints regarding food safety and hygiene issues;
2. report misleading claims made on food products;
3. access basic information about licensed/registered Food Business Operators ("FBOs"); and
4. stay informed about food safety initiatives and alerts.

Any complaint lodged through the app, is automatically routed to the concerned jurisdictional authority of the food business, ensuring prompt redressal and minimising delays in addressing food safety grievances.

For ease of access, FSSAI introduced the Quick Response ("QR") code of the Food Safety Connect App available on the front page of the FSSAI licence and registration. All FBOs, including restaurants, *dhabas*, cafes, eateries and other food service establishments ("Relevant FBOs"), are advised to:

1. prominently display the license/registration copy containing the QR code to download the Food Safety Connect App at customer-visible areas within the premises for being in compliance with Condition of License number 1 (one) of the FSS (Licensing and Registration of Food Businesses) Regulations, 2011. This requirement is further reiterated *vide* press release on August 1, 2025; and
2. feature the QR code/link to download the Food Safety Connect App on digital assets of the food business, such as websites or online ordering platforms, wherever applicable.

This measure is aimed at empowering consumers by providing them with a direct and user-friendly platform for grievance redressal. The Relevant FBOs have also been asked to feature the QR code or a direct download link for the Food Safety Connect App on their

digital assets, including websites and online ordering platforms, wherever applicable.

It remains to be seen how proactively Relevant FBOs comply with this requirement as, with the QR Code already made available in the public domain, it does not require significant infrastructural investment or business model modification by them. At the same time, it would be interesting to note how strictly FSSAI tracks this compliance.



Ayurveda Aahara covered under FSS (Ayurveda Aahara) Regulations, 2022

To offer clarity, standardisation, and consumer safety, FSSAI (under collaboration with the Ministry of Ayush), through an order dated July 25, 2025, provided a list of *Ayurveda Aahara* covered under Category A under the FSS (*Ayurveda Aahara*) Regulations, 2022 ("2022 Regulations").

In a novel approach, FBOs can rely on the ingredients and mode of preparation for the Category A products from the 2022 Regulations, which would lend authenticity to their products for end consumers. Further, FBOs have an ongoing option of requesting the FSSAI to include additional *Ayurveda Aahara* not presently listed in Category A, by providing suitable information and supporting documents on the authenticity of the requested inclusion.

Reports suggest that the Indian *ayurvedic* products market (that includes *ayurvedic* foods but is larger set) was at INR 875.9 billion last year and projected to grow at a compound annual growth rate (CAGR) of over 16% for the next several years. This presents robust opportunities for FBOs to leverage the credibility and certainty that the amended 2022 Regulations present.

Vegetable Oil Products Production and Availability (Regulation) Amendment Order, 2025

The Ministry of Consumer Affairs, Food and Public Distribution (“**MoCA**”), *vide* notification dated August 1, 2025, amended the Vegetable Oil Products Production and Availability (Regulation) Order, 2011. Some of the key amendments are as follows:

1. new definitions of terms such as ‘adjudicating officer’, ‘appellate authority’, ‘director’, ‘nodal officer’ are inserted;
2. a producer who intends to produce, stock for sale or offer for sale vegetable oil, vegetable oil product, solvent extracted oil, must make an application to the director as specified. The director may after making necessary enquiries, issue the registration certificate;
3. every producer must furnish monthly return by the 15th (fifteenth) day of the succeeding month to the director in respect of:
 - a) each vegetable oil received and used by the processing unit as raw material and each vegetable oil product manufactured, sold/imported/exported during the past 1 (one) month in a form specified by the director;
 - b) the stocks held and the quantities and varieties of solvent extracted oil, produced/dispatched by him during the preceding one month; and
 - c) the stocks held and the quantities and varieties of oil-bearing material used during the preceding one month.
4. the director/nodal officer/their appointed representative may inspect any premises, records, vehicles, or vessels related to the production/supply/distribution/import/export of vegetable oil products. The related stocks may be seized if they have reason to believe that the actual production or sales do not match the reported data. All producers are required to provide the necessary information to the director; and
5. every producer must comply with the order or direction given to them.

Enhancement of financial assistance under National Mission on Edible Oils

MoAFW, *vide* press release dated August 1, 2025, extended financial assistance to oil palm farmers across the country under the National Mission on Edible Oils – Oil Palm (“**NMEO-OP**”), for various components such as planting material, maintenance/management, intercropping in oil palm fields, installation of drip irrigation systems, machinery support, and replanting of old gardens. In addition, a price assurance mechanism in the form of Viability Gap Payment is introduced to safeguard farmers against price fluctuations and ensure remunerative returns. Some of the rate of assistance of the components under NMEO-OP, are:

1. for purchasing of planting material, INR 20,000 (Indian Rupees twenty thousand) per hectare for indigenous and INR 29,000 (Indian Rupees twenty-nine thousand) per hectare for imported seedlings (including transport cost) will be provided to the farmers for entire land holding for the 1st (first) year;
2. for maintenance/management, intercropping in oil palm fields (gestation of 4 (four) years), INR 42,000 (Indian Rupees forty-two thousand) per hectare will be provided to farmers in General States and INR 50,000 (Indian Rupees fifty thousand) for Indian States in the northeast region; and
3. for installation of drip irrigation systems as per *Pradhan Mantri Krishi Sinchayee Yojana* norms.



FSS (Labelling and Display) First Amendment Regulations, 2025

FSSAI, *vide* notification dated August 12, 2025, amended the FSS (Labelling and Display) Regulations, 2020, by providing a specific label declaration for every package containing a mixture of coffee and chicory (blended) and instant coffee-chicory mixture to be

placed on the front of the package. The label will provide the percentage of coffee and chicory separately. The amendments will come to effect on July 1, 2026. With several new coffee brands emerging successfully in recent years, this change next year allows businesses to pivot their business model and create a differentiator for themselves in the eyes of the consumer, especially from a premiumisation perspective.



Introduction of new kind of business for 'Ayurveda Aahara' under FoSCoS for license/registration

FSSAI, *vide* order dated September 1, 2025, introduced a new Kind of Business ("KoB") category, 'Ayurveda Aahara', on the FoSCoS portal aligning traditional recipes with contemporary food safety and quality standards. This allows manufacturers to obtain a license or registration for producing and marketing traditional Ayurvedic foods. The new category enables manufacturers across India to apply for such licenses seamlessly. Businesses having a central license can make a payment of payment of annual fee of INR 7,500 (Indian Rupees seven thousand five hundred) plus GST. 'Ayurveda Aahara' refers to food prepared according to recipes and processes from authoritative Ayurvedic texts. It excludes medicinal products and narcotics. The order outlines the requirements and procedures for businesses to apply for KoB. FSSAI published a list of 91 (ninety-one) approved 'Ayurveda Aahara' recipes to provide FBOs with a clear, pre-approved reference for manufacturing products under KoB, ensuring both authenticity and regulatory compliance and help facilitate a smooth transition for the industry.

Permission to manufacturers or packers or importers of pre-packaged commodities to declare the revised retail sale price on the unsold stock

Following the GST rate rationalisation, MoCA *vide* circular dated September 9, 2025, permitted manufacturers/packers/importers of pre-packaged commodities to declare the revised retail sale price ("MRP") on existing stock. The revision may reflect an increase or decrease in tax due to the changes in GST rates. This relaxation applies to unsold stock as on September 22, 2025, upto December 31, 2025, or till such date the stock is exhausted, whichever is earlier, under the Legal Metrology (Packed Commodities) Rules, 2011. Declaration of the changed MRP is proposed to be made by way of stamping or putting stickers or online printing, after complying with certain conditions, such as:

1. the original MRP continue to be displayed, and the revised price must not overwrite on it;
2. the difference between the MRP originally printed on the package and the revised MRP must not, in any case, be higher than the extent of increase in the tax, if any, or in the case of imposition of fresh tax, such fresh tax, on account of implementation of the GST Act, 2017 and rules. In the case of reduction of tax, the revised MRP must not be higher than the extent of price after reduction of tax, if any; and
3. manufacturers/packer/importers must make atleast 2 (two) advertisements in 1 (one) or more newspapers in this regard and also by circulation of notices to the dealers and to the Director of Legal Metrology in the Central Government and Controllers of Legal Metrology in the States and UTs, indicating the change in the price of such packages.

Subsequently, MoCA, *vide* letter dated September 18, 2025, decided that the declaration of the revised MRP on unsold pre-packaged commodities/unused packaging material/wrapper bearing a pre-printed MRP is not mandatory. However, if the manufacturers/packers/importers/their representatives who may like to voluntarily affix additional revised MRP sticker, on unsold packages can do so if they desire. Further, the Central Government,

decided to waive off the requirement to issue advertisement about the revised MRP. The manufactures/packers/importers are required to only circulate the revised price list to wholesale dealers and retailers, with copies endorsed to the Director, Legal Metrology in Central Government and Controllers of Legal Metrology in States/ UTs, about the revised MRP. The advisory also permits use of old packaging material or wrappers printed before the GST revision, up to 31st March 2026 or until such stock is exhausted, whichever is earlier.



Clarification regarding withdrawal of permissions for use of the term 'ORS' along with brand names

FSSAI, *vide* order dated October 15, 2025, superseded and withdrew the earlier orders dated July 14, 2022, and February 2, 2024. These earlier orders had permitted the use of the term Oral Rehydration Solution ("ORS") on food labels as part of the trademark with prefix or suffix in the product name, subject to a declaration requirement.

Subsequently, it is clarified that the use of the term 'ORS' in the trademarked name or in the naming of any food product, whether fruit-based, non-carbonated, or ready-to-drink beverages, is not permitted. Even when used with a prefix or suffix, such usage constitutes a violation of the provisions of the FSS Act, 2006 and the regulations made thereunder. All FBOs are directed to remove the word 'ORS' from their food products whether used as a standalone term or in combination with any prefix/suffix or as part of the trademark with prefix/suffix in the product name and to ensure strict compliance with the labelling and advertisement requirements prescribed under the FSS Act, 2006 and the regulations framed thereunder. The use of the term 'ORS' is misleading to consumers by way of false,

deceptive, ambiguous, and erroneous names/label declarations. It is also in contravention of many sections of the FSS Act, 2006 and the FSS (Labelling and Display) Regulations, 2020.

Provision for granting registration certificate for seasonal food businesses

A provision in the FoSCoS for granting registration certificate for seasonal food business during short events such as religious fairs and food festivals is created through an order dated October 15, 2025, under the window of 'Registering Authority' subject to prescribed conditions. Some of these conditions are:

1. registering authorities are required to fill Form A of the FSS (Licensing and Registration of Food Businesses) Regulation, 2011 on behalf of FBOs;
2. KoBs such as retailers, food vending agencies, petty retailer of snacks/tea shops, hawker and food vending establishment are allowed to register;
3. the validity of such registration will be upto 3 (three) months and is non-renewable; and
4. a fee of INR 100 (Indian Rupees one hundred) will be charged. However, hawkers are exempted from registration fee.

Further, a user manual detailing the procedure of granting registration certificate on the FoSCoS portal by registering authorities is prescribed. This provision is implemented in FoSCoS with effect from August 1, 2025.

Legal Metrology (Packaged Commodities) Amendment Rules, 2025

Amendments are made to the Legal Metrology (Packaged Commodities) Rules, 2011 ("**Packaged Commodities Rules**"), *vide* notification dated October 24, 2025, that aligns packaging and labelling rules for medical devices with the Medical Devices Rules, 2017. These include making declarations for the height of any numeral and letter, and for the width of any numeral and letter. Further, in case where the Medical Devices Rules, 2017 are applicable, the relaxation

given under Rule 33 of the Packaged Commodities Rules, will not apply.

Legal Metrology (Government Approved Test Centre) Amendment Rules, 2025

The Legal Metrology (Government Approved Test Centre ("GATC")) Rules, 2013 are amended pursuant to the Legal Metrology (GATC) Amendment Rules, 2025, *vide* notification dated October 24, 2025. Some of the key amendments are as follows:

1. the weights and measures specified in the First Schedule will either be verified by a GATC or by the legal metrology officers;
2. any person desirous of obtaining recognition for carrying out verification of weights or measures must submit an application to the Joint Secretary, Department of Consumer Affairs in the specified format;
3. the legal metrology officers of the concerned State Government, can inspect the premises of the test centre prior to making any recommendation for its approval, including the specification of its area of operation;
4. the test centre can issue separate certificate of verification for each weight or measure, such that the certificate conforms to individual instrument;
5. the test centre will undertake verification of weight or measure either in its authorised premises or within the territorial limits of the district, and may extend such verification to any part of the State in which the GATC operates; and
6. the fee payable to the test centre for verification or re-verification of weights or measures will be as specified in the Fifth Schedule.

FSS (Import) First Amendment Regulations, 2025

The FSS (Import) Regulations, 2017 are amended *vide* notification dated October 28, 2025, to include the manuals of the method of analysis, adopted by FSSAI, to be used for analysing the samples of food articles. However, in case the method for analysing any parameter is not available in these manuals, the food

laboratory may adopt a validated method of analysis prescribed by AOAC/ISO/Pearson's/Jacob/IUPAC/Food Chemicals CODEX/BIS/Codex Alimentarius/Woodmen/Winton-Winton/Joslyn or any other internationally recognised regulatory agencies (earlier the agencies were not prescribed). Further, for the purposes of analysis of samples of imported articles of food, the notified laboratory or referral laboratory must provide the laboratory analysis report duly signed by its food analyst or director, within 5 (five) days from the date of receipt of the sample (earlier the report had to be signed by food analysts only). These amendments will come into force on May 1, 2026.



Advisory on environmentally compliant disposal of seized, rejected and expired food

FSSAI, *vide* advisory dated November 3, 2025, reiterated on the directives dated December 21, 2020, outlining the procedure for proper disposal of perishable, seized and rejected food items. All the designated officers, food safety officers, and enforcement teams are directed to follow the prescribed procedure to prevent improper disposal and maintain full compliance with the prescribed norms

Hydroxymethylfurfural to be considered as a quality parameter in honey

On November 7, 2025, FSSAI clarified that any honey sample found to be non-compliant with the prescribed limit of 80 (eighty) milligram per kilogram ("**mg/kg**") for Hydroxymethylfurfural will be categorised as 'Substandard' according to the FSS (Food Products

Standards and Food Additives) Regulations, 2011. For context, it must be noted that jurisdictions such as European Union, United Kingdom and United States of America have a safety limit range that typically falls between 40 (forty) mg/kg to 80 (eighty) mg/kg. To that end, setting an upper limit as prescribed by FSSAI should not only be a positive for the domestic consumer but also spur the Indian honey export segment.



SWIFT 2.0 streamlines food import processing, championing 'Ease of Doing'

FSSAI, *vide* press release dated November 12, 2025, integrated its Food Import Clearance System with the Central Board of Indirect Taxes and Customs through the ICEGATE platform under the advanced SWIFT 2.0 initiative. This major digital integration is a significant milestone in promoting the Government's vision of 'Ease of Doing Business' and trade facilitation. It is designed to (a) further streamline the import clearance process by enhancing transparency; (b) promoting efficiency across the system; (c) significantly reduce human interface; (d) minimises delays; and (e) ensures greater objectivity and accountability.

Advisory for milk vending kiosk

To ensure food safety, consumer confidence and interests, transparency and to encourage participatory food safety culture, FSSAI, through an advisory dated November 19, 2025, directed all dairy manufacturers who are involved in sale of milk/milk products through vending/kiosk machine to keep or make available FSSAI-approved/validated rapid test kits at the vending/kiosk location for basic detection of common adulterants in milk/milk products. The dairy units are required to ensure the following:

1. display simple instructions on how to use the rapid test kit;
2. facilitate consumer self-checking, by either allowing consumers to use kits at the kiosk area or keeping the kits for demonstration by trained staff;
3. ensure that kits used are within validity period and stored as per manufacturer's guidelines; and
4. monitor and record the results and utilisation of testing kits.

FSS (Alcoholic Beverages) Second Amendment Regulations, 2025

Amendments are made to the FSS (Alcoholic Beverages) Regulations, 2018, *vide* notification dated November 19, 2025, which will come into effect from June 1, 2026. Accordingly, the maximum permissible limit of esters (as ethyl acetate) in alcoholic beverages is revised from 0.2 (point two) per gram per liter ("g/l") to 3.0 (three) g/l of absolute alcohol. These limits are typically higher than limits set in other major jurisdictions such as the EU. The substantial increase in ester levels is also likely to increase marketability of alcoholic beverages through newer brands, flavours and varieties.

Extension of date of enforcement for labelling provisions

The enforcement date of some provisions relating to labelling for mead (honey wine), craft beer, Indian liquors, wine-based beverages, alcoholic ready-to-drink (RTD) products and Indian liquors, under the FSS (Alcoholic Beverages) First Amendment Regulations, 2025 ("Amendment Regulations") was specified as January 1, 2026. Pursuant to the release of the Amendment Regulations, representations were received from various stakeholders expressing the operational difficulties that mid-year change in labelling requirements would create. Therefore, to omit such difficulties, on November 27, 2025, extensions were provided in the date of enforcement up to July 1, 2026, for provisions relating to labelling under the Amendment Regulations.

Enforcement action against use of industrial dye auramine in food products such as roasted chana and other products

The Commissioners of food safety of all States/UTs and Central Licensing Authorities (“**Licensing Authorities**”), *vide* circular dated November 28, 2025, are directed to conduct targeted enforcement actions including inspections, sampling, testing and subsequent actions of roasted *chana*, and other similar food products which are vulnerable to adulteration through Auramine (an industrial dye used for textiles and leather). Further, the Licensing Authorities are directed to initiate appropriate actions against the defaulting FBOs, under their respective jurisdictions and submit a consolidated action-taken report within 15 (fifteen) days.

Auramine, being a yellow dye, is used in chana, turmeric, yellow sweets and similar food items. FBOs (not just makers/manufacturers) will now be obligated to comply with the exclusion obligation in this regard.

Legal Metrology (Packaged Commodities) Second (Amendment) Rules, 2025

With effect from February 1, 2026, the rule of exemption in respect of packages where the net weight or measure of the commodity is 10 (ten) gram or 10 (ten) milli litre or less, if sold by weight or measure, will not apply to pan masala, as specified in the notification dated December 2, 2025. Rule 26(a) of the Packaged Commodities Rules describes the exemptions in respect of certain packages, whereby the Packaged Commodities Rules will not be applicable to any package containing a commodity with the net weight of 10 (ten) gram or 10 (ten) milli litre or less, or any package containing fast food items packed by restaurant, or agricultural form produces in packages of above 50 (fifty) kilo gram etc.

Compliance of scheme of testing for packaged drinking water and mineral water

FSSAI, *vide* circular dated December 17, 2025, specified that the mandatory Bureau of Indian Standards (“**BIS**”)

certification mark is no longer required for packaged drinking water and mineral water. Pursuant to the omission of the provision for mandatory BIS certification under the FSS (Prohibition and Restriction of Sales) Regulation, 2011, the scheme of testing of ‘Packaged Drinking Water’ and ‘Mineral Water’ is made to ensure safety and compliance of packaged drinking water and mineral water in the Indian market. Therefore, all FBOs are directed to strictly comply with the prescribed scheme of testing. Further, the mandatory BIS certification mark is no longer required for packaged drinking water and mineral water. The prescribed scheme of testing for packaged drinking water outlines *inter alia* the following:

1. packing provisions;
2. the levels of control;
3. microbiological requirements;
4. parameters of the source water;
5. types of containers; and
6. hygienic conditions



Implementation of standardised format for submission of representation seeking risk assessment

To ensure smooth management, tracking, and transparency by FSSAI, a standardised format for submission of representation is implemented for compliance through an office order dated December 24, 2025. This aims to enable the scientific panels and scientific committee to conduct risk assessments in alignment with the FSSAI (Transaction of Business and Procedure for the Scientific Committee and Scientific Panel) Regulations, 2016. Therefore, all stakeholders including FBOs, industry associations, research

institutions, professionals, and citizens are invited to voluntarily share data generated through monitoring, internal assessments, or research & development relevant to food safety and nutrition, in the prescribed format.

Bureau of Energy Efficiency (Appliance Labeling and Compliance) Regulations, 2026

The Bureau of Energy Efficiency, *vide* notification dated December 29, 2025, issued a comprehensive framework governing the display of essential information on labels, including their particulars, manner and time-limits, to establish the process for applying for and granting permission to affix such labels. These regulations outline the process of the following:

1. appliance labelling and registration, including the process, particulars, time-limit, fee of label display along with process of refund of label security deposit and acceptable modes of payment;
2. the process of label and compliance verification by the bureau, testing to ensure that the appliances or equipment conforms to the energy performance standards and norms as prescribed, conduct the failure check test for appliance or equipment; and
3. publishing the operational manual consistent with the Energy Conservation Act, 2001, for the implementation of the Standards and Labelling Programme, including the procedure for undertaking the market surveillance activity or any other similar activity by the bureau or State designated agency and check testing.



Food and Consumer Protection 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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Partner



19 Practices and
40 Ranked Lawyers



7 Ranked Practices,
21 Ranked Lawyers



15 Practices and
20 Ranked Lawyers



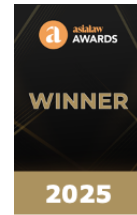
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