



4th August, 2020

Ms. Rita Teotia
Chairperson, FSSAI
New Delhi

Sub: Request to redraft the order directing Food Business Operators to display certain details on container/tray holding sweets

Ref: FSSAI order dated 24th February 2020 (copy enclosed herewith)

Respected Madam,

Greetings from Gujarat Chamber of Commerce and Industry (GCCI).

Gujarat Chamber of Commerce and Industry (GCCI) is the apex trade and industry body representing the interests of the entire business fraternity of the state of Gujarat.

We request you to kindly refer to the order dated 24th February, 2020 issued by your good office, regarding display of “Date of Manufacturing” and “Best Before Date” by Food Business Operators (FBOs) on the container/tray used for holding the sweets.

Madam, while we appreciate and strongly stand by you for taking initiatives aimed at ensuing consumer protection, we are concerned that this order will have significant unintended and adverse consequences for the FBOs as they are finding it practically difficult to implement this order.

We have received several inputs from the food industry questioning the feasibility of the order and its possible implementation. One such representation made by Shree Gujarat Rajya Mithai Farsan Utpadak Vepari Mahamandal is enclosed herewith for your kind perusal.

Madam, we understand that this order was actually intended to protect consumers and provide an opportunity to modernize the regulatory structure, however in reality the order is only adding to the already stringent regulations without doing much good for the consumers, the economy or the Food Business Operators who are facing genuine difficulties in its implementation.

Durgesh V. Buch
President

Natubhai Patel
Sr. Vice President

Bhargav Thakkar
Vice President

Sanjeev Chhajer
Secretary

Dilip M. Padhya
Secretary (R)

Pathik S. Patwari
Treasurer



We therefore request you to consider redrafting this order so that the Food Business Operators do not have to face undue hardships and can sustain their industry in these challenging times.

We look forward to your early positive intervention in the matter.

With Regards,

Sincerely,

Durgesh Buch
President

Encl: As above

CC:

1. Shri Nitinbhai Patel, Deputy Chief Minister, GoG
2. Dr. Harsh Vardhan, Minister of Health and Family Welfare, GoI
3. Shri Arun Singhal, IAS, CEO, FSSAI
4. Dr. Shobhit Jain, Executive Director, FSSAI
5. Shri Hemant Koshia, Commissioner, FDCA, Gujarat

Durgesh V. Buch
President

Natubhai Patel
Sr. Vice President

Bhargav Thakkar
Vice President

Sanjeev Chhajer
Secretary

Dilip M. Padhya
Secretary (R)

Pathik S. Patwari
Treasurer

Shree Gujarat Rajya Mithai Farsan Utpadak Vepari Mahamandal



Correspondance Address : C/o. Kandoi Bhogilal Mulchand
2715, Kandoi Ole, Manek Chowk, Ahmedabad - 380 001 Gujarat (India) • E-mail : gujaratsweetfarsan@gmail.com

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Treasurer
BHARATBHAI PUROHIT
98790 31801

To,
Shri Durgesh Buch
President ,
Gujarat Chamber Of Commerce and Industries,
Shri Ambica Mills,
Gujarat Chamber Building,
Ashram Road,
Ahmedabad, Gujarat 380009

Date:27/07/2020

Sub: Making a representation to FSSAI order dated 24/02/20

Dear sir,

We are writing to you regarding raising a voice against the new order passed by FSSAI dated 24th February 2020 related to Direction regarding display of "Date of Manufacturing" and Best Before Date" in case of loose sweets, FSSAI has ordered FBO To display such dates on the container/tray holding loose sweets.(the order is attached).

The order was going to be implemented on 01/06/20 and was delayed first upto 01/08/20 and now delayed upto 01/10/20 .

They haven't taken into amount the practical impossibility of implementation of this order.

Regarding putting the date of manufacturing and best before on the display trays it's not feasible. Various associations have made their representation. We also

: Vice Presidents :

V. P. VAISHNAV
99099 99199

JAYANTILAL SHETH
98250 36146

RAJESHBHAI SUKHMEDIA
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Shree Gujarat Rajya Mithai Farsan Utpadak Vepari Mahamandal



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98790 31801

have made a strong representation to FSSAI. Herewith we are attaching the document no 4, letter from Shree Gujarat Rajya Mithai Farsan Utpadak Vepari Mahamandal to Fssai, it is a technical representation made covering all major points

Even various Associations from across India have made representation few are attached for reference.

We urge the Gujarat Chamber Of Commerce and Industries, to make a representation for the Traditional sweets industry.

Thank You,

Kamlesh Kandoi ,
President

Baiju Mehta,
Vice President

Letter cc to:

Hiren Gandhi, Chairman, Food Committee, GCCI.

Please find attached the following

- 1) FSSAI order dated 24/2/20 for display of date of mfg and best before
- 2) extension order 1
- 3) extension order 2
- 4) Letter by Shree Gujarat Rajya Mithai Farsan Udyog Vepari Mahamandal
- 5) Letter by Shree Mumbai mishtan bhandar vyvsai Sahakri mandal ltd
- 6) Letter by Halwai Associatoon Punjab
- 7) Letter by Bruhat Bangalore hotels Association
- 8) Guidance note no.13/2019
- 9) Guidance note no 14/2020

: Vice Presidents :

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98242 14861

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File No.13(29)2019/Milk /RCD/FSSAI
Food Safety and Standards Authority of India
(A Statutory Authority established under the Food Safety and Standards Act, 2006)
Regulatory Compliance Division
FDA Bhawan, Kotla Road, New Delhi-110002

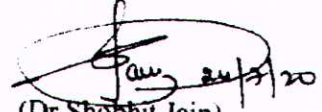
Dated: 24th July, 2020

ORDER

Subject: Directions regarding display of "Date of Manufacturing" and "Best before Date" in case of sweets - reg.

Reference is invited to FSSAI Orders of even no. dated 24.02.2020 and 21.05.2020 on the subject mentioned above. In view of disruption and lockdown due to Covid 19 pandemic and representations received from sweets associations and stakeholders, it has been decided to give a final extension to the date of enforcement for display of "Date of Manufacturing" and "Best before Date" of non-packaged/loose sweets on their container/tray at the outlet for sale from 1st August, 2020 to 1st October, 2020. During this period, sweets associations are advised to sensitize and build capacity of their members to implement the Order from 1st October, 2020.

2. This issues with the approval of the competent authority in exercise of powers vested under Section 16(5) of the Food Safety and Standards Act, 2006.


(Dr. Shobhit Jain)
Executive Director (RCD)

To,

1. Commissioner of Food Safety of All States/UTs
2. All Central Licensing Authorities
3. CITO, FSSAI: For uploading this order on FSSAI website

Shree Mumbai Mishtann Vyavasai Sahakari Mandal Ltd.

श्री मुम्बई मिष्टान व्यवसाई सहकारी मण्डल लिमिटेड

(Consumer Co-op. Society : Registration No. C. 912-1947)

E-mail : pradeepjain36@hotmail.com

Office : 1-2, Piroja Mansion, Grant Road Station (East), MUMBAI - 400 007.

Date : _____

Address C/o : A/304, Navneelam Society, 108 Dr. R G Thadani Marg, Worli, Mumbai 400018

12th July 2020

To,
Ms Rita Teatota,
Chairperson,
FSSAI,
FDA Bhavan,
Kotala Road, New Delhi.110002

Sub:- Display of "Date of Manufacturing "and "Best Before" in case of Sweets offered to sale in loose form.

Ref: File No13 (29)2019/Milk/RCD/FSSAI dated: 24th Feb. 2020

Respected Madam,

We are an association of manufacturers and sellers of Indian Sweets and Namkeen of Mumbai. We would like to represent before your kind self about our (with other sister associations of Maharashtra) views and feedback on above referred matter, for your kind consideration and review of the same.

Our humble submissions are as under:

1. Firstly, FSSAI declared the date of implementation of this order from 1st June, 2020 (which now stands extended to 1st August 2020) without calling for the suggestions and comments from the stakeholders in this regards. Also, in the guidance note no: 14/2020 and guidance note no: 13/2020 it only asks to display "Best before or Use before" and not the manufacturing date.
2. As per Rule-2.2of Chapter -2 sub Rule-2.2.1. clause-1 the intention of the legislature is clear which reads as-"Every PRE-PACKAGED FOOD SHALL CARRY A LABEL CONTAINING INFORMATION as required hereunder ". Therefore there is no requirements of labeling for non-packed foods or loose foods. For example fresh fruits and vegetables or prepared fresh foods like sandwiches. By trying to implement such a rule the administration is going beyond the mandate given by the legislature. Also, it's a gross discrimination with our trade when thousands of loose food items are

SHREE MUMBAI MISHTHAN VYAVSAI SAHAKARI MANDAL LIMITED... Continuation sheet.

Being allowed to sell without labelling then why deliberately only loose sweets are considered for this regulation?

3. Even as per Rule-2.6 Sub Rule 2.6.1.(4) of FSSAI FOOD SAFETY AND STANDARDS (PACKING AND LABELLING) REGULATIONS, 2011 provides the exemption from labelling- in case of food with shelf-life of not more than seven days, the "Date of manufacture" may not be required to be mentioned on the label of packaged food article, but the "use by date" shall be mentioned on the label by manufacturer or packer. Why such order for unpacked sweets if such exemptions are provided to packed food items. As most of the sweets have short shelf life.
4. Clerically it is very difficult to mention and display the "Date of Manufacturing" and "Best Before" periodically on Sweet display tray. There may be a chance of typographic mistake, without any intention. It is also not specified in order how to put such declaration like date on tray/container, permanent solution like inkjet printing is not possible. (Labeller gun or any other temporary solution to change it regularly would conflict with the FSSAI FOOD SAFETY AND STANDARDS (PACKING AND LABELLING) REGULATIONS, 2011, general requirement that "Label in PRE-PACKED foods shall be applied in such a manner that they will not become separated from the container.")
5. In festival times, the sales of these items grow exponentially, and in those times of rush it is not humanly possible to label the loose trays, as desired by the authorities. Even in regular days changing label is quite cumbersome job and chances of errors are too many.
6. In many cases the manufacturer and retail establishments are different entities. The manufacturing units send the bulk Sweets and the retail units transfer it to the presentable tray/ containers holding the sweet for customers display. The retail unit not being a manufacturer cannot put the date of manufacturing as it would be against the letter and spirit of the law.
7. As far as our information goes: None of the developed countries like USA, Australia, Canada, U.K, Countries of European Union etc. have such a legislation/regulation.
8. Due to this provision, small FBOs may be tempted to falsify the dates. It will also encourage nothing but corruption.
9. Psychologically, if the customer knows that the sweet is two or more days old then he will hesitate to purchase even though sweets will have shelf life AS PER THEIR STORAGE CONDITIONS, AND will be safe, edible and fit for consumption.
10. Mithai – Farsan FBOs range from big to small FBOs. Majority are small and illiterate/semi-literate businessmen. They cannot afford to comply with such provision, if it is so implemented in its present form then small FBOs dealing in sweets would be very badly affected & some of them even may have to wind up.

SHREE MUMBAI MISHTHAN VYAVSAI SAHAKARI MANDAL LIMITED... Continuation sheet.

11. It is difficult to calculate the BEST BEFORE DATE of any unpacked Food items. Unpacked sweets aren't in controlled environment thus a best before date isn't justifiable. We can tell suggestive shelf life of unpacked sweets to the customers, we can guide them but we cannot take responsibility as there are various factors affecting shelf life of sweets like storage temperature, weather, humidity, hygiene etc.

To sum up

Considering all the foregoing points and also this present times of pandemic which has caused huge losses to our trade; due to spoilage of perishable items due to sudden announcement of lockdown and the losses are still continuing due to extension of lockdown and/or partial lockdown, it is not the appropriate time to burden our trade with such an impractical regulation. More so when our Honourable Prime Minister has given the call for "Vocal for Local" and expects us that we should all be supporting traditional Indian products, this trade needs all round support from FSSAI too.

We therefore request the authorities to keep this regulation in abeyance, at least for a period of one year. Start this process from zero, get all the stake holders on board and make the way forward in a systematic and practical way. Also, we would like to study and analyse the complaints/feedbacks etc. received by your office and other state FDAs, about the quality and sub-standard/expired and stale sweets being sold by the sweets manufacturers/sellers (which necessitated the introduction of this regulation). Please order the department to make them available to us and all other stake holders.

Before we conclude, we would like to assure your learned self that our members are equally (if not more) concerned, as your good self are, for the health and well-being of their consumers as they are the source of bread and butter for them and it's a question of their livelihood and therefore our members, even in their dreams, cannot afford to play with the health/lives of their customers.

It would be an honour to interact with your team as we wish to assist them with our inputs and feedbacks; Kindly consider our Submissions with a humble request and do not implement the order till a final and just decision is taken by your noble self, after verifying all the facts/details and ground realities.

Kindly do the needful and oblige.

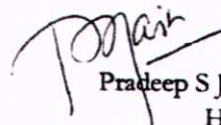
With regards,

Thanking you,

We remain,

Yours sincerely,

For Shree Mumbai Mishthann Vyavasai
Sahakari Mandal Limited



Pradeep S Jain

Hon. Secretary

(9820222441); pradeepjain36@hotmail.com)



ಸ್ಥಾಪನೆ : 1936

ಬೃಹತ್ ಬೆಂಗಳೂರು ಹೋಟೆಲುಗಳ ಸಂಘ (ರಿ.) BRUHAT BANGALORE HOTELS ASSOCIATION (REGD.)

ನಂ. 87, ಶ್ರೇಷ್ಠ ಭೂಮಿ ಸಂಕೀರ್ಣ, ಯೂನಿಟ್ ನಂ. 307, 3ನೇ ಮಹಡಿ, ಕೆ.ಆರ್. ರಸ್ತೆ, ಬಿ.ಬಿ. ಪುರಂ, ಬೆಂಗಳೂರು-560 004

No. 87, Shresta Bhoomi, Unit No. 307, 3rd Floor, K.R. Road, V.V. Puram, Bangalore - 560 004

Phone & Fax : 080-26509314, Mobile : 96060 76487

e-mail : bangalorehotelsassn@gmail.com, website : www.bangalorehotelsassn.com

To,
Smt. Manjushree Narasimhaiah,
The Commissioner,
Food Safety and Standards Authority of India
Bangalore.

Date:07/07/2020

Subject: With reference to the order dtd: 24/2/2020 regarding display of
"Date of manufacturing" and "Best before date".

Dear Madam,

With reference to the order: File no13(29)2019/Milk/RCD/FSSAI dated:24th Feb 2020, these are the few practical problems enlisted after collaborative discussion among the few sweet manufacturers. They are as follows:

1. We regret to state that FSSAI has not invited the suggestions and comments in this regards and finally declared the date of implementation of this order from 1st June 2020 as it is extended up to 1st Aug 2020. Also the guidance note: 14/2020 and guidance note no: 13/2020 it only asks to display 'Best before or Use before' and not the "Manufacturing date".
2. As per Rule-2.2 of chapter-2 sub rule-2.2.1 clause-1 the intention of the legislature is clear which reads as "Every PRE-PACKAGED FOOD SHALL CARRY A LABEL CONTAINING INFORMATION as required hereunder.....". So there is no requirements of labeling for non-packed foods or loose foods. For example, fresh fruits and vegetables or prepared fresh foods like sandwiches. Then why INTENTIONALLY only loose sweets are considered for this regulation only.
3. Even as per Rule-2.6 Sub Rule 2.6.1(4) of FSSAI FOOD SAFETY AND STANDARDS (PACKING AND LABELLING) REGULATIONS, 2011 provides the exemption from labelling- in case of food with shelf life of not more than seven days, the "Date of manufacture" may not be required to be mentioned on the label of packaged food article, but the "Use by date" shall be

mentioned on the label by manufacturer or packer. Why such order for unpacked sweets if such exemptions are provided to packed food items. As most of the sweets have short shelf life.

4. Clerically it is very difficult to mention and display the "Date of Manufacturing" and "Best before" periodically on sweets display tray. There may be a chances of topographical error without any intention. It is also not specified in order how to put such date on tray/ container, permanent solution like inkjet printing is not possible. Labeler gun or any other temporary solution to change it regularly would conflict with the FSSAI FOOD SAFETY AND STANDARDS (PACKING AND LABELLING) REGULATIONS, 2011, general requirement that "Label in PRE-PACKED foods shall be applied in such a manner that they will not become separated from the container.
5. Labelling of loose sweets with a manufacturing date & time would change the very essence of selling process of traditional sweets, because it will create a shift in the mindset of buyers by raising credibility on the freshness and hygienic storage condition of the products they had been consuming trustfully over so many years.
6. Traditional sweets are being prepared without adding any preservatives, hence no specific date of expiry can be given as it depends on many extrinsic factors.
7. Shelf life of any loose product would vary greatly on climatic and weather conditions of the geographical area and location of the stores.
8. Unpacked sweets aren't in controlled environment thus a best before date isn't justifiable. Shelf life of each product varies from one another. Therefore, in mixed sweets packing box, shelf life can't be fixed due to its physical and chemical properties (moisture content, method of preparation etc.) of the product packed inside.
9. Packing material also greatly impacts the shelf life of the product.
10. Product shelf life also depends on the storage condition and handling by the customers.



11. Many of the manufacturing and retail concern of sweets FBO's are different entity. The manufacturing unit send the bulk sweets and retail unit transfers it to presentable tray/ container holding the sweet for customers display.

12. Mithai-FBO's range from big to small. Majority are small and illiterate / semi-literate businessmen. They cannot afford to comply with such provision, if it is so implemented then small FBO may be badly affected and there will be a rise in unemployment.

13. Due to this provision, small FBOs may be attracted to falsify the dates.

14. In foreign developed countries like America, Australia, Canada, U.K., there is no such provision.

In addition to these challenges, we perceive our industry navigating through a complex environment of regulatory support, solutions availability and stricter controls in order to protect our very existence.

Hence, it is our humble request if you could spare your precious time to discuss these pressing issues for the sweet industry and help us sail safely through this situation with meaningful solutions. Kindly refer the matter with central FSSAI commissioner also and do the needful

Thanking You,
Yours Sincerely,



P.C Rao
President
9844494630

Copy to: Mr. Pawan Kumar Agarwal,
Central Commissioner FSSAI,
New Delhi

Guidance Note on Traditional Milk Products

Summary

This Document seeks to help Food Business Operators ensure basic hygiene and sanitation in manufacturing and sale of milk products particularly sweets. It also suggests a line of action to the food safety regulatory authorities to prevent adulteration in milk products and ensure effective regulatory compliance for food safety in milk products. It focuses on enhanced declaration by sellers [Shelf Life, made of ghee/vanaspati], guide test for detection of adulteration, quality assessment by observation of flavours, body texture, colour and appearance etc. It will increase consumer awareness about food safety and empower them with knowledge and grievance redressal avenues available to them.

Key Takeaways

- Food Business Operators should comply with FSS Act, Rules and Regulations. Food Business Operators should ensure hygiene and sanitation.
- Food Business Operators should indicate the shelf life of pre-packaged as well as non-packaged milk products.
- Food Safety Authorities should have regular surveillance and enforcement activities on milk products.
- Consumers may ascertain about the freshness and probability of adulteration by observing the colour, texture and flavour of milk products. They can also carry out simple tests to identify adulteration in milk products.



This Guidance Note has been prepared by Mr Parveen Jargar, Joint Director at FSSAI based on FSSAI resources including Regulations, Standards and DART Book. This note contains information collected and compiled by the author from various sources and does not have any force of law. Errors and omissions, if any can be kindly brought to our notice.

1. Introduction

Traditional/indigenous dairy products such as khoa, chhana, paneer and khoa/chhana based sweets have been produced and marketed in India for centuries. The manufacture and trading of these products is largely confined to Halwais. Such dairy products are more susceptible to adulteration during festive season particularly due to mismatch in demand and supply. To avoid adulteration and to ensure food safety requires concerted efforts by Food Safety Regulatory Authorities, Food Business Operators and Consumers, are required.

Challenges in Traditional milkproduct sector

- Use of non-permitted colour, flavour or other ingredients.
- Use of Raw Materials of poor quality for sweet manufacturing
- Repeated use of oil in cooking/preparation , leading to increased level of trans fat
- People involved in manufacture of traditional dairy products (Halwais) lack adequate knowledge of good hygienic practices.
- Lack of packaging and labelling systems that severely limit the shelf life.
- Lack of quality/ legal standards and quality assurance systems.
- Lack of training sessions and audits in place.

Responsibilities of Food Business Operators

- The general hygiene and sanitary requirements as specified under Schedule IV of FSS (Licensing and Registration of Food Businesses) Regulations 2011 should be scrupulously complied with.
- In case of pre-packaged milk products, the list of ingredients and the date of manufacturing and best before or use by date should invariably be mentioned as prescribed under the FSS (Packaging and Labelling) Regulations, 2011.
- In case of non-packaged/loose sweets, the container/tray holding the items at the outlet should display the following information:
 - i. Best before or use by date.
 - ii. Whether Oil/ghee/Vanaspati used
- The record of source of dairy based products should be maintained.
- FSSAI License/Registration should be prominently displayed at the unit.
- Use of non permitted colors and repeated use of oil should be avoided.
- For sale of savouries, sweets or other articles of food, the notice board should indicate whether articles which have been cooked in ghee, edible oil, vanaspati and other fats for the information of the consumers.

Shelf life of sweets

The Indian sweets use a variety of ingredients such as khoya, ghee, flours, dry fruits, sugar etc. The shelf life of sweets depends upon the ingredients used. For example, the Khoya Burfi has shorter shelf life than Boondi Ladoo. In this regard, an illustrative list of sweets with their shelf life is given below:

Shelf-Life	Item
To be kept at room temperature and consumed on the same day	Kalakand and its variants like Butterscotch Kalakand, Rose Kalakand, Chocolate Kalakand.
To be kept in refrigerator and consumed within 2 days from date of manufacturing	Milk Products and Bengali Sweets such as Badam milk, Rasgulla, Rasamalai, RasMalai, RabriRasmalai, ShahiToast, Rajbhog, Cham Cham, Sandesh, Malai Roll, Bengali Rabri, Hiramani, Gur Sandesh, Hari bhog, Anurodh, Anarkali, madhuri, Pakiza, Raskadam, Gur Kaccha Gola Sandesh, RasKatta, KheerMohan, GurRasmalai, Gur Rabri, GurRasgulla.
To be consumed within 4 days from date of manufacturing	Ladoo and Khoya Sweets such as Milk Cake, Mathura Peda, Plain Burfi, Milk Burfi, Pista Burfi, coconut burfi, chocolate burfi, Safed Pede, BoondiLadoo, Coconut Ladoo, Lal Ladoo, Motichor Modak, KhoyaBadam, MewaBatti, Fruit Cake, KhoyaTil Fruit Cake, kesar coconut ladoo, SmallMalaiGhewar, VratKesaria Coconut Ladoo, Small mewaLadoo, pink burfi ,sevbadam burfi ,TilBugga, Rewari burfi, Dry Fruit Tilbugga, ShahiGhewar, KhoyaKesarBadam Roll, TilBati, Kheer Kadam, Kheera Beej burfi, Khoya Coconut Burfi, MotiPak.
To be consumed within 7 days from date of manufacturing	Sweets with ghee and dry fruits such as Dry fruit ladoo, KajuKatli, Ghewar, Sakkar Para, Gur Para, ShahiLadoo, Moong Burfi, Aataladoo, BesanLadoo, Dry fruit Gujia, MotiBoondiLadoo, KajuKaser Burfi, Kaju Baked Gujia, BadamLaung, Balusahi, badam burfi, KajuAnjeer Roll, Kesar Big Malai , Chandrakala, ChhakMitthi, KesarGujia, Maida Gujia, Kajukhazoor, PistaLaung, Small KesarGhewar, KesarChandrakala, Anjeer Cake, Kaju apple, KajuGujia, Kaju Honey Dew, KajuKalash, kajuKesar, KajuLadoo, Kaju Roll, Kaju Samosa, DilKhushal Burfi, Kaju Rose Katli, kaju Baked gujia , kajuladoo, Besan Burfi, Kaju Rose Katli.

Quality Check

The consumers should observe the flavour, body and texture, colour and appearance of milk products and decide the quality and freshness of the product. In this regard, indicative flavour, body and texture etc. of certain items is given below for guidance:

Product	Flavour	Body and texture	Colour and appearance
Khoa	A typical mildly cooked flavor similar to that of boiled milk is most acceptable. The taste is preferably sweet.	Soft and uniform body with granular texture is most desirable. Pindikhoahas smooth, compact, homogenous texture with very fine grains. Dhapkhoahas granular texture and slightly soft body. In Danedarkhoa, presence of big grains with brown colour is desirable.	Cow milk khoais pale yellow with a tinge of brown having moist surface, whereas buffalo milk khoais white with a tinge of brown having slightly greasy/oily surface.
Peda	Cooked to slightly heated flavour with sweet taste.	Soft, greasy to dry body with grainy texture.	White to brown colour with absence of burnt particle
Burfi	Mildly caramelised and pleasant flavour with sweet taste.	The body characteristics of burfi may range from very loosely compacted to close-knit body. The texture could also vary from smooth to granular and crisp to chewy.	The colour may range from off white to creamy or light caramel, depending upon the type of milk solids used as base material and also the extent of heat desiccation during preparation. It should be free from burnt particles,
Kalakand	Fresh, clean, pleasant caramel sweet flavour.	Cohesive body with granular close knit texture.	Off white to light brown with absence of burnt particles.
GulabJamun	Typical heated fresh aroma, tastes moderately sweet, free from doughy feel and	Soft and thin crust, smooth granular texture, soft and spongy, free from lumps and hard central core.	Lightly to yellowish brown, uniform, round/ elongated shape, smooth, glossy,

	fully saturated from syrup.		moderate size.
Basundi	Pleasant caramelized flavour	Creamy consistency and viscous body with soft textured flakes uniformly suspended throughout the product.	Cream to light caramel colour.
Rabdi/Rabri	Pleasant caramelized flavour	Creamy consistency and viscous body containing several layers of clotted cream with a chewy texture.	Creamy white to light caramel in colour.
Kheer	Sweet, nutty, pleasant flavour	Thick, viscous mass with uniformly distributed rice.	White to slightly brownish. A rich creamy shade is preferred.
Chhana	Mildly acidic smell and pleasant sweetish taste are considered desirable.	Moderately soft body and uniform texture, with slight springiness. It should yield round ball of even surface and no cracks. It should not release fat on kneading/working.	Uniform yellow (from cow milk) to whitish colour (from buffalo milk). Slightly moist surface. Absence of burnt particles.
Paneer	A characteristic blend of flavour of heated milk and acid, that is pleasant, mildly acidic and sweet (nutty).	It should be sufficiently firm to hold its shape during cutting yet tender enough not to resist during mastication/chewing. Compact, smooth, velvety and close-knit texture.	Uniform yellow (from cow milk) to whitish colour (from buffalo milk).
Sandesh	Typically cooked and heated aroma; sweet, fresh, creamy taste.	Soft grade is cohesive, smooth and little grainy. Hard grade is crumbly, smooth and has fine grains.	White colour, round shape, smooth moderate size.
Rasogolla	Pleasant flavour, moderately sweet, free from doughy feel and	Soft body and maximum sponginess, free from lumps and hard centre.	White colour, round shape, smooth moderate size.

	fully saturated with syrup.		
Dahi	Pleasant sweetish aroma of diacetyl and clean acid taste.	A weak gel like junket, a creamy layer of fat if whole milk is used. Homogenous body, while cut surface is trim and free from cracks and gas bubbles.	Creamy yellow for cow milk and creamish white for buffalo. It should have smooth and glossy surface with no whey separation.
Shrikhand	A clean, pleasant, sweet-sour flavour representing blend of sugar and fermented milk solids.	Typical semi-solid uniform consistency showing a characteristic firmness and shall show a smooth texture and no graininess.	Uniform colour and glossy appearance and devoid of free fat and syrup separation.
Mishtidoi	Pleasant sweet fermented flavor.	Firm consistency with smooth texture.	Uniform cream to light brown colour.
Ghee	A natural sweet, pleasant, nutty, slightly cooked/caramelised aroma and an agreeable taste.	A good textured ghee requires large and uniform grains with very little liquid fat. A greasy texture is objectionable.	When melted, it should be clear; transparent and free from sediment and uniform throughout. It should be bright yellow for cow and white with greenish tinge for buffalo milk.
Lassi	Sweetish rich, aroma and mild to high acidic taste, flavoured either with salt or sugar depending on regional preference.	Homogenous and viscous liquid.	White to creamy white.

Quick Tests

Consumers can test common adulterants in the milk products using Quick Tests as given below.

Name of Food Article	Adulterant	Simple Method for detection of Common Adulterants
Ghee, cottage cheese, condensed milk, khoa, milk powder etc.	Coal Tar Dyes	Add 5 ml of dil. H_2SO_4 or conc. HCl to one teaspoon full of melted sample in a test tube. Shake well. Pink colour (in case of H_2SO_4) or crimson colour (in case of HCl) indicates coal tar dyes. If HCl does not give colour repeat once after dilution with water.
Sweet Curd	Vanaspati	Take a teaspoon of curd in a test tube. Add 10 drops of hydrochloric acid. Mix the contents by shaking the test tube gently. After 5 minutes, examine the mixture. Red colouration indicates the presence of Vanaspati in the curd.
Rabri	Blotting paper	Take a teaspoon of rabri in a test tube. Add 3 ml of hydrochloric acid and 3 ml of distilled water. Stir the content with a glass rod. Remove the rod and examine. Presence of fine fibres on the glass rod will indicate the presence of blotting paper in rabri.
Khoa and its products	Starch	Boil a small quantity of sample with some water, cool and add few drops of Iodine solution. Formation of blue colour indicates the presence of starch
Chhana or Paneer	Starch	Boil a small quantity of sample with some water, cool and add a few drops of Iodine solution. Formation of blue colour indicates the presence of starch.
Ghee or butter	Vanaspati or Margarine	Take one tea spoon full of melted sample of Ghee or butter with equal quantity of concentrated Hydrochloric acid in a stoppered test tube and add to it a pinch of sugar. Shake for one minute and let it undisturbed for five minutes. Appearance of crimson colour in lower (acid) of Vanaspati or Margarine. Remarks: The test is specific for sesame oil which is compulsorily added to vanaspati and margarine. Some coal tar colours also give a positive test. If the test is positive i.e. red colour develops only by adding strong Hydrochloric acid (without adding crystals of sugar) then the sample can be

		deduced to be is adulterated with coal tar dye. If the crimson or red colour develops after adding and shaking with sugar, then alone vanaspati or margarine is present
Ghee	Mashed Potatoes, Sweet Potatoes and other starches.	The presence of mashed potatoes and sweet potatoes in a sample of ghee can easily be detected by adding a few drops of Iodine, which is brownish in colour turns to blue if mashed potatoes/sweet potatoes/other starches are present.

Responsibilities of Food Safety Regulatory Authorities

Food Safety Commissioners of States/UTs should ensure compliance and food safety for milk products. Special drive should be conducted frequently to ensure freshness and quality of sweets sold in retails including sweets shops, halwai shops etc.

- A vigil should be maintained on sweet shops to eliminate the chances of adulteration particularly in milk products. In case any violation is found, stringent action should be taken as per the provisions of FSS Act, 2006 and Rules/Regulations made there under.
- Surveillance activities should be undertaken regularly, and the data so obtained should be analysed to identify the hot spots which should be intensely targeted.
- Intensify surveillance during festive seasons when demand of milk and milk products increase.
- The prolonged tenure of FSOs at the same or nearby stations as well as any conflict of interest, with self or family business of sweets shops/halwais, should be avoided. States may follow a policy of periodic transfers.
- Generate local intelligence regarding the malpractices. The supervising officer must take action to ensure neutrality.
- Consumer awareness programme should be conducted to apprise consumers about common malpractices, train them in performing quick tests, inform about avenues to file their grievances
- They should also reassure public in case of any panic.

Consumer Grievance Redressal

FSSAI has various interfaces where, in case consumers have grievance against FBOs, they can register their grievances. The details of these interfaces are listed below:

- e-mail - compliance@fssai.gov.in
- Whatsapp - 9868686868

- Facebook Page - FSSAI
- Twitter - @fssaiindia
- FSSAI concern web portal –Food Safety Connect <https://foodlicensing.fssai.gov.in/cmsweb/>
- SMS- 9868686868
- Toll- Free No. –1800112100
- Application – Food Safety Connect (android)

8. References

- FSSAI Regulations and Standards
- FSSAI Resources
- www.fssai.gov.in

Shree Gujarat Rajya Mithai Farsan Utpadak Vepari Mahamandal



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To,
Ms Rita Teatiam,
Chairperson,
FSSAI,
FDA Bhavan,
Kotala Road, New Delhi.110002

Sub:- Display of "Date of Manufacturing "and "Best Before" in case of Sweets sale in a loose form.

Respected Sir,

With reference to your order: File No13 (29)2019/Milk/RCD/FSSAI dated: 24 th Feb. 2020, we would like to represent the comments and suggestions on behalf of Shree Gujarat Rajya Mithai Farsan Utpadak Vepari Mahamandal.

1. We regret to state that FSSAI has not invited the suggestions and comments in this regards and finally declared the date of implementation of this order from 1st , Jun , 2020 as it is extended up to 1 St August 2020. Also in the guidance note no: 14/2020 and guidance note no: 13/2020 it only asks to display "Best before or Use before" and not the manufacturing date.
2. As per Rule-2.2of Chapter -2 sub Rule-2.2.1. clause-1 the intention of the legislature is clear which reads as-"Every PRE-PACKAGED FOOD SHALL CARRY A LABEL CONTAINING INFORMATION as required hereunder ". So there is no requirements of labeling for non packed foods or loose foods. For example fresh fruits and vegetables or prepared fresh foods like sandwiches. Then why INTENTIONALLY only loose sweets are considered for this regulation only.
3. Even as per Rule-2.6 Sub Rule 2.6.1.(4) of FSSAI FOOD SAFETY AND STANDARDS (PACKING AND LABELLING) REGULATIONS, 2011 provides the exemption from labelling- in case of food with shelf-life of not more than seven days, the "Date of manufacture" may not be required to be mentioned on the label of packaged food article, but the "use by date" shall be mentioned on the label by manufacturer or packer. Why such order for unpacked sweets if such exemptions are provided to packed food items. As most of the sweets have short shelf life.

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4. Clerically it is very difficult to mention and display the "Date of Manufacturing" and "Best Before" periodically on Sweet display tray. There may be a chances of mistake topographically without any intention. It is also not specified in order how to put such date on tray/container, permanent solution like inkjet printing is not possible. Labeller gun or any other temporary solution to change it regularly would conflict with the FSSAI FOOD SAFETY AND STANDARDS (PACKING AND LABELLING) REGULATIONS, 2011, general requirement that "Label in PRE-PACKED foods shall be applied in such a manner that they will not become separated from the container."
5. Many of the manufacturing and retail concern of sweets FBO's are different entity. The manufacturing unit send the bulk Sweets and the retail unit transfers it to presentable tray/container holding the sweet for customers display. The retails unit not being a manufacturer cannot put the date of manufacturing as it would be against the law.
6. In Foreign developed countries like America, Australia, Canada, U.K, there is no such provision.
7. Due to this provision, small FBOs may be attracted to falsify the dates. It will also encourage nothing but corruption.
8. Psychologically, if the customer knows that the sweet is two or more days old then he will hesitates to purchase even though sweets will have shelf life AS PER THEIR STORAGE CONDITIONS, AND will be safe and edible for consumption.
9. Mithai – Farsan FBO's range from big to small FBO's. Majority are small and illiterate/semi-literate businessmen. They cannot afford to comply with such provision, if it is so implemented then small FBO may be badly affected & their will be a rise in unemployment.
10. It is difficult to calculate the BEST BEFORE DATE of any unpacked Food items. Unpacked sweets aren't in controlled environment thus a best before date isn't justifiable. We can tell suggestive shelf life of unpacked sweets to the customers, we can guide them but we Cannot take responsibility as there are various factors affecting shelf life of sweets like storage temperature, weather, humidity, hygiene etc. This becomes binding on seller, even though it's not UNDER THEIR CONTROL AS IT IS DEPENDING UPON THE SEASON, ATMOSPHERE AND STORAGE CONDITIONS WHICH ALL ARE DIFFERENT FROM PLACE TO PLACE END PERSON TO PERSON.

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For example consider this scenario, in this monsoon season a customer purchases 2 identical packs of khoya burfi. He opens one immediately after purchase, and frequently keeps opening the pack or transfers the burfi to a container that permits air circulation then burfi may stay good for 5-8 days and may be more again depending on ambient condition. The other pack customer doesn't open, the Burfi will spoil in 2-3 day (fungus). If customer had kept the burfi in Freezer(-18 degree) or refrigerated(0-4 degree) then the burfi would last long 3-1 months (deepening upon storage) Thus there are many variables that affect the shelf life.

11. At present due to the long lockdown of the Nation, the abundance number of people including FBO facing many crises including financial and social. We request the authorities to redraft above order and not to implement this order Compulsory/mandatory.

We would like to interact with your team and wish to make representation in person but due to COVID -19 travelling at this time is difficult, also many of our member are senior citizen so a face to face representation would be DIFFICULT. Please consider our comments and a humble request and do not implement the order.

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- Cc to: (1) Shree Arun Singhal, CEO, FSSAI, New Delhi
(2) Shree Shobhit Jain, Executive Director (compliance strategy), FSSAI, New Delhi
(3) Shree H.G Koshia, Food safety Commissioner, Gujarat State, Gandhinagar.

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PB/HAP/20-21/27
Ref. No.

23th July 2020

Dated

To
Ms Rita Teatonia
Chairperson,
FSSAI,
FDA Bhavan,
Kotla Road, New Delhi. 110002

Sub:- Display of "Date of Manufacturing "and "Best Before" in case of
Sweets offered to sale in loose form.

Ref: File NO13 (29)2019/Milk/RCD/FSSAI dated: 24th Feb. 2020

Respected Madam,

We are an association of manufacturers and sellers of Indian Sweets and Namkeen of Punjab. We would like to represent before your kind self about our views and feedback on above referred matter, for your kind consideration and review of the same.

Our humble submissions are as under:

1. Firstly, FSSAI declared the date of implementation of this order from 1st June, 2020 (which now stands extended to 1st August 2020) without calling for the suggestions and comments from the stakeholders in this regards. Also, in the guidance note no: 14/2020 and guidance note no: 13/2020 it only asks to display "Best before or Use before" and not the manufacturing date.
2. As per Rule-2.20f Chapter -2 sub Rule-2.2.1. clause-I the intention of the legislature is clear which reads as-"Every PRE-PACKAGED FOOD SHALL CARRY A LABEL CONTAINING INFORMATION as required hereunder ". Therefore there is no requirements of labeling for non-packed foods or loose foods. For example fresh fruits and vegetables or prepared fresh foods like sandwiches. By trying to implement such a rule the administration is going beyond the mandate given by the legislature. Also, it's a gross discrimination with our trade when thousands of loose food items are Being allowed to sell without labelling then why deliberately only loose sweets are considered for this regulation?
3. Even as per Rule-2.6 sub Rule 2.6.1.(4) of FSSAI FOOD SAFETY AND STANDARDS (PACKING AND LABELLING) REGULATIONS, 2011 provides the exemption from labelling- in case of food with shelf-life of not more than seven days, the "Date of manufacture" may not be required to be mentioned on the label of packaged food article, but the "use by date" shall be mentioned on the label by manufacturer or packer. Why such order for unpacked sweets if such exemptions are provided to packed food items. As most of the sweets have short shelf life.



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Dated

4. Clerically it is very difficult to mention and display the "Date of Manufacturing" and "Best Before" periodically on Sweet display tray. There may be a chance of typographic mistake, without any intention. It is also not specified in order how to put such declaration like date on tray/container, permanent solution like inkjet printing is not possible. (Labeller gun or any other temporary solution to change it regularly would conflict with the FSSAI FOOD SAFETY AND STANDARDS (PACKING AND LABELING) REGULATIONS, 2011, general requirement that "Label in PRE-PACKED foods shall be applied in such a manner that they will not become separated from the container.")

5. In festival times, the sales of these items grow exponentially, and in those times of rush it is not humanly possible to label the loose trays, as desired by the authorities. Even in regular days changing label is quite cumbersome job and chances of errors are too many.

6. In many cases the manufacturer and retail establishments are different entities. The manufacturing units send the bulk Sweets and the retail units transfer it to the presentable tray/containers holding the sweet for customers display. The retail unit not being a manufacturer cannot put the date of manufacturing as it would be against the letter and spirit of the law.

7. As far as our information goes: None of the developed countries like USA, Australia, Canada, U.K., Countries of European Union etc. have such a legislation/regulation.

8. Due to this provision, small FBOs may be tempted to falsify the dates. It will also encourage nothing but corruption.

9. Psychologically, if the customer knows that the sweet is two or more days old then he will hesitate to purchase even though sweets will have shelf life AS PER THEIR STORAGE CONDITIONS, AND will be safe, edible and fit for consumption.

10. Mithai — Farsan FBOs range from big to small FBOs. Majority are small and illiterate/semi-literate businessmen. They cannot afford to comply with such provision, if it is so implemented in its present form then small FBOs dealing in sweets would be very badly affected & some of them even may have to wind up.

11. It is difficult to calculate the BEST BEFORE DATE of any unpacked Food items. Unpacked sweets aren't in controlled environment thus a best before date isn't justifiable. We can tell suggestive shelf life of



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Ph. : 01834 222002 M. 99880 03800

EDITOR

RAVINDER SACHDEVA
Metro Corner
Near Bus Stand, Bhatinda.
Ph. : 0184 2215238, 99148 24665

Ref. No.

Dated

unpacked sweets to the customers, we can guide them but we cannot take responsibility as there are various factors affecting shelf life of sweets like storage temperature, weather, humidity, hygiene etc.

To sum up

Considering all the foregoing points and also this present times of pandemic which has caused huge losses to our trade; due to spoilage of perishable items due to sudden announcement of lockdown and the losses are still continuing due to extension of lockdown and/or partial lockdown, it is not the appropriate time to burden our trade with such an impractical regulation. More so when our Honourable Prime Minister has given the call for "Vocal for Local" and expects us that we should all be supporting traditional Indian products, this trade needs all round support from FSSAI too.

We therefore request the authorities to keep this regulation in abeyance, at least for a period of one year. Start this process from zero, get all the stake holders on board and make the way forward in a systematic and practical way. Also, we would like to study and analyze the complaints/feedbacks etc. received by your office and other state FDAs, about the quality and substandard/expired and stale sweets being sold by the sweets manufacturers/sellers (which necessitated the introduction of this regulation). Please order the department to make them available to us and all other stake holders.

Before we conclude, we would like to assure your learned self that our members are equally, (if not more) concerned, as your good self are, for the health and well-being of their consumers as they are the source of bread and butter for them and it's a question of their livelihood and therefore our members, even in their dreams, cannot afford to play with the health/lives of their customers.

It would be an honour to interact with your team as we wish to assist them with our inputs and feedbacks; Kindly consider our Submissions with a humble request and do not implement the order till a final and just decision is taken by your noble self, after verifying all the facts/details and ground realities.

Kindly do the needful and oblige.

With regards,

Thanking You

Yours sincerely,

Halwai Association Punjab (Regd.)

Narinder Pal Singh
Narinder Pal Singh
(President)

Bipan Jain
Bipan Jain
(Gen. Secretary)