Product Development - Concerns & Expectations

24th January 2015
World Trade Center

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Regulations is about balancing food diversity and safety
### India . . A leading producer

<table>
<thead>
<tr>
<th>No</th>
<th>Commodity</th>
<th>Production/Yr (m MT)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Milk</td>
<td>105</td>
</tr>
<tr>
<td>2</td>
<td>Tea</td>
<td>0.9</td>
</tr>
<tr>
<td>2</td>
<td>Rice</td>
<td>104</td>
</tr>
<tr>
<td>2</td>
<td>Fruits &amp; Vegetables</td>
<td>150</td>
</tr>
<tr>
<td>3</td>
<td>Food grains</td>
<td>230</td>
</tr>
<tr>
<td>3</td>
<td>Fish</td>
<td>7</td>
</tr>
</tbody>
</table>

**ABUNDANTLY BLESSED . . .**

- 52% cultivable land (11% world average)
- 15 major climates
- 46 of 60 soil types exist

**No. 1 Growth Sector - 7.5% annual**

**300 billion US$ (2013).**

And yet

Innovation is a Challenge
Indian Food Acts

Prevention of Food Adulteration Act, 1954
Adulteration Framework

Food Safety & Standards Act Act 2006
Risk Framework
**ADULTERATION FRAMEWORK**

Innovation restricted

**Technological Challenge**

- Tomato soup - creamy texture
- Adjust pH - prevent curdling
- Add: Sodium bicarbonate (cooking soda)

- Permit based V/s Risk based
- ADI NOT LIMITED (GMP)
- India - Product wise approval
ADULTERATION FRAMEWORK

*Innovation Restricted*

Consumer Choice:

- **Codex Stan 160-1987:** Mango Chutney
- **FSSR 2011: 2.3.42:** Mango Chutney (TSS 50%)

- Healthy choice vs Adherence to Standard
  - Cannot use the name ‘chutney’
  - Forces the use of ‘excess sugar’
  - Even when sugar is declared
PROPRIETARY FOODS.

• It is not a ‘category of foods’ sharing certain attributes e.g.
  o Food Supplements
  o Foods for Special Dietary Uses

• It represents an enabling ‘provision’ in food law
  o to develop and market food products
  o in an unencumbered manner
  o Within the applicable regulations.
Product Approval

- Reversed this provision in law
- Removes ‘free access’ to the market - even if product is safe

FAQ: In case where the product is already approved under the product approval system, for minor compositional changes of ingredients e.g. Glucose is changed from 25% to 20%, 2% salt reduction, do a FBO need to apply for product approval again?
  - Yes, except where FSS Regulations have been defined.

Procedure is
- Adulteration framework (PFA) and not
- Risk Framework (FSSA)
Freedom to innovate

- Innovate with ‘Predictability’
- FSSA 2006 promises this . . .
  - Science based *(Evidence)*
  - Transparent Process

Thank you