

Product Development - Concerns & Expectations

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Dr. Joseph Lewis



**Regulations is about balancing
food diversity and safety**

India . . A leading producer

No	Commodity	Production/Yr (m MT)
1	Milk	105
2	Tea	0.9
2	Rice	104
2	Fruits & Vegetables	150
3	Food grains	230
3	Fish	7

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 2006

Risk Framework

ADULTERATION FRAMEWORK

Innovation restricted



Tomato Soup

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



Tomato Chutney

Consumer Choice:

Codex Stan 160-1987: Mango Chutney

FSSR 2011: 2.3.42 : Mango Chutney (TSS 50%)

Healthy choice V/s 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.**
 - Food Supplements
 - Foods for Special Dietary Uses
- **It represents an enabling ‘provision’ in food law**
 - to develop and market food products
 - in an unencumbered manner
 - 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