

## Labelling for alcoholic beverages

- 1 As per the Food Safety and Standards 2006, ingredient is defined under Section 3 (1) (y) "ingredient" means any substance, including a food additive used in the manufacture or preparation of food and present in the final product, possibly in a modified form. This section is aligned with the Codex Alimentarius. Both in Food Safety and Standards Regulations and Codex, alcoholic beverages are not classified as single ingredient food.

As per 2.2.2:2 of FSS (Packaging and Labelling) Regulations 2011,

- except for single ingredient foods, a list of ingredients shall be declared on the label. This is also applicable to alcoholic beverages, if additives including colour, water and preservatives etc are used in the manufacture of alcoholic beverage and are present in the final product.
  - Addition of flavours need not be declared specifically but the statement to this effect shall be given on the label.
  - In case, if the alcoholic beverage is a single ingredient, no ingredient list is required to be declared on the label like any other food product.
- 2 The following specific labelling requirements for alcoholic beverages are exempted as per the FSS (Packaging and Labelling) Regulations 2011, which are in force since 5<sup>th</sup> August 2011:
    - a) Best before date shall not be applicable to :
      - i. Wines and liquors
      - ii. Alcoholic beverages containing 10 percent or more by volume of alcohol
    - b) Declaration of Veg/Non-Veg logo on the label shall not apply in respect of alcoholic drinks.
    - c) Nutritional information is not required in case of Alcoholic beverages.

### **Labelling of Canola Oil:**

Canola Oil is an edible vegetable oil produced from rapeseeds bearing low erucic acid. Canola Oil has been imported into India for the past few years; majority of the import is from Canada. "Canola" is a trademarked name given to rapeseed – low erucic acid oil. The "Can" part stands for Canada and "ola" refers to oil and the other claim is, it stands for "Can(ada)+o(il)+l(ow)+a(cid).

Canola Oil is a trade name given to Rapeseed oil- low erucic acid, which is already specified under 2.2.1 (7) of FSS (Food Product Standards and Food Additives) Regulations, 2011.

Further, Rapeseed oil – low erucic acid is listed in the CODEX Standard for named Vegetable Oils in Descriptions as Rapeseed oil – low erucic acid (canola oil). The Canola Oil labelled and marketed as Canola Oil and sought to be sold in India is not in accordance with the requirements required under the Food Safety and Standards (Packaging and Labelling) Regulations, 2011, mainly because;

**a) The Name of Food** (shall be declared as per the sub regulation 2.4.2.2 of Food Safety and Standards (Packaging and Labelling) Regulations, 2011) - Every container in which solvent-extracted oil is packed for sale shall bear the following: (i) the name, trade name, if any, or description of the solvent-extracted oil.

**Appropriate marking: - Imported Rapeseed - low erucic acid oil. Canola Oil (Additionally Trade Name can be used)**

**b)** Every container of refined vegetable oil shall bear the following label (shall be declared as per the sub regulation 2.4.2.5 of Food Safety and Standards (Packaging and Labelling) Regulations, 2011, namely,— Refined (name of the Oil) Oil; the container of imported edible oil shall also bear the word, "Imported", as prefix. As per the requirements the name shall be,

**Appropriate marking: - Imported Refined Rapeseed - low erucic acid oil. Canola Oil (Additionally Trade Name can be used)**

**c) list of ingredients** – (shall be as per the sub regulation 2.2.2:2 of Food Safety and Standards (Packaging and labelling) Regulations, 2011) Except for single ingredient foods, a list of ingredients shall be declared on the label in the following manner - The list of ingredients shall contain an appropriate title, such as the term "Ingredients" and a specific name shall be used for ingredients in the list of Ingredients. As per the requirements the ingredients shall be,

**Appropriate marking: - Ingredients: - Edible vegetable oil (But not to mention as Canola Oil), other ingredients**

It is also to inform that Imported product should comply with FSS Act 2006, Rules and Regulations made there under before import.

In view of the above, if the imported canola oil is to be marketed in India in accordance with 2.2.1.(7) of Food Safety and Standards (Packaging and labelling) Regulations, 2011 it shall be declared as **Imported Refined Rapeseed Oil - Low Erucic Acid Oil** to ensure protection of the interests of consumers and to provide basis for consumers to make informed choices in relation to the foods they consume as per the Section 18 (2) (e) of Food Safety and Standards Act 2006. The manufacturer may, if desired, write Canola Oil in parenthesis."