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**A RESEARCH ON FOOD SECURITY AND CONSUMER PROTECTION IN INDIA****Author** - JAYA MAHATY MANDALAPARTHY, ALLIANCE SCHOOL OF LAW, ALLIANCE UNIVERSITY, BANGALORE**Best Citation** - JAYA MAHATY MANDALAPARTHY, A RESEARCH ON FOOD SECURITY AND CONSUMER PROTECTION IN INDIA, *ILE Consumer Protection Law and Review*, 1 (1) of 2023, Pg. 18-24, ISBN - 978-81-961120-4-2.**ABSTRACT**

FSSAI, short for Food and Safety Standards Authority of India, is the statutory body for ensuring the safety and quality of food in India. It authorizes licenses for manufacturers, distributors, and sellers of food products, promotes public awareness about food safety, and punishes those who violate its quality standards. The Consumer Protection Act is another statute that helps deal with circumstances detrimental to the health and welfare of a consumer. With food being the primary form of nutrition provided to us, it ought to be of good quality to provide proper nutrition. Food protection is essential to prevent illnesses, protect consumer health, and maintain quality. Since supermarkets and grocery stores are the primary sources of food products, keeping them clean and ensuring quality produce becomes paramount. Also, ensuring that means of production, the process and the distribution is without the inclusion of hazardous substances is important. However, due to people being corrupt, there has been a fall in food quality and the nourishment it provides to the human body. Countries like the United States, Canada, European Union, and Australia are known for having strong food protection laws, which reduces the rate of adulterated food and provides their people with nutritive food. This paper provides an analysis of the Consumer Protection Act of 2019 and its impact on the food industry. It also aims to inform the reader about food fraud and food protection laws in India alongside The Food Safety and Standards Act with the help of case laws and judgments over time.

**Keywords:** food protection, Consumer Protection Act, safety standards, nutrition, Food Safety and Standards Act, adulteration.

**INTRODUCTION**

India ranks sixth in the list of food and grocery markets. The food sector alone is responsible for around 12.2% of employment and around 14% of the GDP generated per year.<sup>73</sup> The agricultural sector contributes to 20.19% of the nation's GDP and has almost 152 million people working in the sector. Combined, we can say that the production, manufacture and distribution of goods in India is a major contributor to its economy and provides millions with employment. With food being the obvious source to provide our bodies with the supplements it needs, it is crucial that this sector works to produce pure, healthy and nutritious food. It is, however, observed, that majority of food available in the market are, in some sort, not as healthy or pure as we would wish.

Eva Maria Hanson, a digital food safety specialist defines food safety as 'the practices that are observed during the handling, processing and distribution of food to ensure that contaminants that can cause foodborne illnesses are not present.' Simply put, it is the precautions a food producer must take while manufacturing and distributing his products. This is to prevent the chances of diseases being spread through food. The quality of food produced and released into the market for the general consumer is a major concern. The most

<sup>73</sup> <https://pib.gov.in/PressReleaseIframePage.aspx?PRID=1885037>

common concerns with regard to food safety include adulteration, misleading marketing, faulty packaging and storage, presence of unsafe ingredients, etc.

In a recent study, the World Health Organization revealed that 600 million people fall sick due to foodborne illnesses and almost 420,000 of them die every year.<sup>74</sup> This further puts the pressure on governments across the world to improve their standards of food that is being sold to consumers. Not only to increase lifespan, but also to prevent diseases, improve lifestyle and the quality of life.<sup>75</sup>

FSSAI, short for Food Safety and Standards Authority of India, is the statutory authority for regulation and implementation of food-related laws in India. Established in the year of 2008 by the Ministry of Health & Family Welfare, the FSSAI adopted six key regulations after extensive discussions and meetings with numerous stakeholders.<sup>76</sup> The FSSAI's top priorities are developing standards for food products that are based on science and regulating their production, storage, distribution, sale, and import to guarantee that there is a supply of healthy, safe food for human use.<sup>77</sup> Various statutes such as the Food Safety and Standards Act, 2006 and the Consumer Protection Act, 2019 help enforce food protection legally onto producers, distributors and consumers.

These laws define every term in relation to food that is necessary, describe to the readers what acts are against food safety and inform the reader processes through which they can report it.

## **BODY**

### **Types of Food Safety Issues**

As aforementioned, there are majorly three concerns with regard to food products.

<sup>74</sup> <https://www.fooddocs.com/post/food-safety-statistics>

<sup>75</sup> <https://www.fooddocs.com/post/why-is-food-safety-important>

<sup>76</sup> <https://www.fssai.gov.in/cms/regulations.php#:~:text=After%20the%20enactment%20of%20the%20deliberations%2F%20meetings%20with%20various%20stakeholders.>

<sup>77</sup> <https://clap.nls.ac.in/wp-content/uploads/ConsumerGuide/10FoodSafety.pdf>

Adulteration, in legal terms, is defined as a food product failing to meet the legal standards set for it. Substances that are added to reduce the quality of food are known as 'adulterants.' They reduce the nutritional value of the food and in most cases render the food unfit for consumption. For example, certain chemicals are added to fruits to speed up the ripening process. According to a report by the Animal Welfare Board, about 68.7 per cent of all milk and its products produced are impure.<sup>78</sup> Products are sometimes dyed with synthetic colours to attract a customer. Cheaper substances such as pebbles, stones, etc. are added into good crop such as grain to increase the overall weight. This not only cheats the consumers but also makes them prone to sickness such as kidney disorders, heart failure and many more. Adulteration is done to increase production and sales, maximise profits with lesser investment, and lack of knowledge.<sup>79</sup>

The term "misleading advertisement" refers to situations in which a seller misrepresents the nature of their goods and services, makes false claims about them, hides material facts, or engages in unfair business practices. This is stated in Section 2(28) of the Consumer Protection Act, 2019.

Improper packaging of food products can lead to physical, chemical and microbial contamination. In numerous instances, people have gone viral on social media sharing their stories of finding obscure products in their food items. Not only is this unhealthy, it also poses a choking hazard. Chemical contamination is highly dangerous and can pose a serious threat to the consumer. If the products are not properly sealed or preserved, it can lead to the growth of microbes such as fungus, mould and yeast, all of which are the root causes of a variety of diseases plaguing the human race.<sup>80</sup> It entails damage to the packaging of the good

<sup>78</sup> <https://timesofindia.indiatimes.com/life-style/health-fitness/health-news/68-4-milk-in-india-is-adulterated-finds-survey/articleshow/66029797.cms>

<sup>79</sup> <https://byjus.com/biology/food-adulteration/>

<sup>80</sup> <https://blog.masterpackgroup.com/3-common-contamination-risks-in-food-packaging>

that occurred either while manufacture or distribution.<sup>81</sup>

### **How to report this?**

If you feel that your rights have been infringed, you can report it by approaching the Food Safety Officer of the Area or the Food Safety Commissioner of the State. Otherwise, you can contact the Ministry of Consumer Affairs, Food & Public Distribution through the National Consumer Helpline 1800-11-4000.<sup>82</sup> FSSAI also has a helpline to address consumer grievances, which is available around the clock-18001122100. Consumers can report their issues via app, website, WhatsApp and other social media channels.<sup>83</sup> The period of limitation is two years after purchase of product.

### **FSSAI**

On 23<sup>rd</sup> August 2006, The Food Safety and Standards Act was approved by the President of India and faced 80 amendments, the most recent one on 21<sup>st</sup> of February, 2023.<sup>84</sup> <sup>85</sup> FSSAI describes this act as 'an Act to consolidate the laws relating to food and to establish the Food Safety and Standards Authority of India for laying down science based standards for articles of food and to regulate their manufacture, storage, distribution, sale and import, to ensure availability of safe and wholesome food for human consumption and for matters connected therewith or incidental thereto.'<sup>86</sup> This Act also includes rules for the production of animal feed and the jurisdiction of FSSAI in the same regard was amended in 2020. Other notable amendments in the Act are the penalties for violation of the Act.

<sup>81</sup> [https://www.mondaq.com/india/dodd-frank-consumer-protection-act/860250/impact-of-the-consumer-protection-act-2019-on-the-food-industry-and-food-aggregators#\\_ftn1](https://www.mondaq.com/india/dodd-frank-consumer-protection-act/860250/impact-of-the-consumer-protection-act-2019-on-the-food-industry-and-food-aggregators#_ftn1)

<sup>82</sup> <https://consumerhelpline.gov.in/faq-details.php?fid=Food%20and%20Food%20Safety#:~:text=Where%20can%20I%20report%20a,Safety%20Commissioner%20of%20the%20State.>

<sup>83</sup> [https://foodregulatory.fssai.gov.in/helpdesk#:~:text=To%20address%20the%20concern%20of,1800112100\).](https://foodregulatory.fssai.gov.in/helpdesk#:~:text=To%20address%20the%20concern%20of,1800112100).)

<sup>84</sup> <https://www.fssai.gov.in/cms/amendment-fss-fps-fa.php>

<sup>85</sup> <https://www.fssai.gov.in/cms/act-2006.php#:~:text=FSSAI&text=The%20Food%20Safety%20and%20Standards,1%20dated%2024th%20August%2C%202006.>

<sup>86</sup> <https://fssai.gov.in/cms/food-safety-and-standards-act-2006.php#:~:text=It%20is%20an%20Act%20to,and%20wholesome%20food%20for%20human>

When introduced, it was seen as a single statute in place of the various Acts and Orders that were in place in regards to food protection. For example, Vegetable Oil Products Order (1947), De-Oiled Meal and Edible Flour Control Order (1967), Prevention of Food Adulteration Act (1954), etc. were repealed after FSS Act came into place.<sup>87</sup>

### **Penalties<sup>88</sup>**

- Section 50- any person selling food which is not up to the standards mandated by FSSAI will be liable to a penalty of no more than five lakh rupees. Anyone who doesn't comply to this must pay a maximum of 25, 000 rupees as fine.
- Section 51- if sub-standard food is sold, stored or manufactured by a person, or by another on his behalf, they will be liable to a penalty which may extend to five lakh rupees.
- Section 52- if any person sells, stores or manufactures, for his own benefit or for another, any food item that is misbranded, he shall have to pay a penalty of up to three lakh rupees.
- Section 53- misleading advertisements will lead to the advertiser needing to pay up to ten lakh rupees as penalty.
- Section 54- if any person sells, stores or manufactures, for his own benefit or for another, any food item that contains extraneous matter, he shall have to pay a penalty of up to one lakh rupees.
- Section 55- if any food business importer doesn't adhere to the guidelines set by FSSAI, they may be liable to a penalty of up to 2 lakh rupees.
- Section 56- unhygienic manufacturing of food is penalized and the manufacturer is liable for at most ten lakh rupees under a penalty.

<sup>87</sup> [https://fssai.gov.in/cms/about-fssai.php#:~:text=Vegetable%20Oil%20Products%20\(Control\)%20Order,commencement%20of%20FSS%20Act%2C%202006.](https://fssai.gov.in/cms/about-fssai.php#:~:text=Vegetable%20Oil%20Products%20(Control)%20Order,commencement%20of%20FSS%20Act%2C%202006.)

<sup>88</sup> <https://www.indiafilings.com/learn/fssai-penalty-and-offenses/>

- Section 57- possession of an adulterant is punishable by this Act. They are liable to pay up to 2 lakhs if it is non-injurious to health and almost 10 lakhs if it is injurious to human health.

**Consumer Protection Act, 2019**

The Consumer Protection Act, 2019 is a very crucial statute in Indian law with respect to the food industry. It protects consumers’ rights and protects them by preventing production and release of defective products into the market. It imposes obligations on all producers to ensure the safety and quality of products.<sup>89</sup> It protects consumers against unfair trade practices and hazardous goods. It also gives consumers the right to information regarding anything about any product in the market, to be heard in forums and councils for their issues and access to goods. CPA, initially enacted in 1986, was replaced by the Consumer Protection Act of 2019. It lays down the rights and responsibilities of a consumer.

A consumer has the right to:

- Safety- a consumer can ask for guarantee of quality of a good before consumption or purchase
- Choose- a consumer has the choice of opting for whichever good they prefer in an array of available ones.
- Be informed- consumers must be informed regarding all details of the good to ensure they make the right choice.
- Consumer education- a consumer must be aware of their rights
- Be heard- must be given a platform to address their concerns and issues
- Seek compensation-can seek redressal if they feel injustice has occurred to them.

On the other hand, a consumer has the following responsibilities:

- Responsibility to be aware: a consumer must keep in mind the quality and safety of goods before consumption.
- Responsibility to think independently: they must be able to make wise choices on their own.
- Responsibility to speak out: must communicate with distributors and producers what they want and need without hesitation.
- Responsibility to be an ethical consumer: they themselves must not engage in immoral activities.<sup>90</sup>

**CASE LAWS**

1. Hindustan Unilever Limited v. State of Uttarakhand (2015) – In this case, the High Court of Uttarakhand held that a company cannot be held liable for contamination of its product if it was not aware of the contamination and took all necessary steps to prevent it.
2. Nestle India Limited v. Food Safety and Standards Authority of India (2015) – The Delhi High Court directed Nestle India to recall all nine variants of Maggi noodles from the market and stop their production and sale on the grounds of unsafe and hazardous food.
3. PepsiCo India Holdings Private Limited v. Food Safety and Standards Authority of India (2018)

In this case, the Bombay High Court held that a food business operator cannot sell products that do not comply with the FSSAI and its regulations, even if they have been approved by a third-party laboratory.

4. The State of Himachal Pradesh v. Narinder Mohan (2019)

The Himachal Pradesh High Court held that if a food business operator is found guilty of selling adulterated food, then he/she is liable to pay compensation to the consumer.

<sup>89</sup> <https://www.mondaq.com/india/dodd-frank-consumer-protection-act/860250/impact-of-the-consumer-protection-act-2019-on-the-food-industry-and-food-aggregators>

<sup>90</sup> <https://byjus.com/commerce/what-is-the-consumer-protection-act/#:~:text=The%20Consumer%20Protection%20Act%2C%20implemente,d.their%20rights%20as%20a%20consumer.>

5. Swami Achyutanand Tirth and Ors. v. Union of India (UOI) and Ors.<sup>91</sup>

The petitioners claimed that the government was not doing enough to maintain quality of milk being produced and distributed, and that adulteration of milk was at an unimaginable level. They claimed that hazardous substances such as caustic soda, refined oil, detergent, white paint, etc. were used to make the milk appear legitimate, which is causing adverse effects on the consumer's health. Using an FSSAI produced report on milk adulteration as their ground, they accused the state governments for letting adulteration rise to such a high level. The report stated that in states like West Bengal and Jharkhand, 100% of milk distributed was adulterated. The Court ordered the Union of India and the State Governments to make suitable and stricter amendments to the Indian Penal Code as well as the Food Safety and Security Act. Every state was given a list of regulations to abide to help curb the rising level of health risks due to adulteration of milk.

6. Hindustan Coca-Cola Beverages Pvt. Ltd. v. Purushottam Gaur<sup>92</sup>

The complainant purchased a bottle of Fanta and upon further inspection discovered that there were insects in his drink. He demanded a hefty compensation from Coca Cola Company, claiming that this incident occurred due to their negligence and subpar hygiene in their production facilities. While the District Forum dismissed the complaint, the State Commission held the Company liable. Coca Cola was ordered to pay 10000 rupees as compensation and 300 rupees as costs.

This is somewhat similar to the English case law *Donoghue v Stevenson*, where the plaintiff found a decomposed snail at the

bottom of her beer and sued the beer manufacturer when she fell ill due to it. The House of Lords then held that there was duty of care the respondent owed to the appellant as his actions would impact his consumers.<sup>93</sup>

7. Avon Beej Company v. Anoop Singh<sup>94</sup>

Anoop Singh took Madan Lal and Om Prakash's land for lease for agricultural purposes. He paid them 1, 20,000 as the lease amount. He went to an agricultural store for purchasing paddy seeds and on the assurance of the store's clerk bought 30 kg of the seeds for 1800 rupees. The clerk alleged that these were unadulterated and quality seeds. According to the Complainant, despite his best efforts in inculcating scientific methods and various tools, he could only yield 60% of the crop. Allegedly, he would've earned 3, 00,000 rupees if he was provided with quality seeds for the entire crop. On grounds of deficiency of service, he demanded 3 lakh rupees for loss of crop, 80,000 towards agricultural purchases for the crop, 1 lakh for the distress he underwent and 1, 20,000 rupees toward the land lease. It was established after inspection that the seed was not pure.

8. Nandan Biomatrix v. S. Ambika Devi<sup>95</sup>

The respondent was a small landholder. The appellant, a seed company, put out an advertisement regarding buy back of safed musli. Safed Musli is a medicinal crop used as an aphrodisiac and adaptogen. The respondent bought 750 kg of wet musli at 400 rupees per kilogram for the purpose of growing them on her land. She entered into a tripartite agreement where the appellant was to buy back the produce at a minimum rate of 1000 rupees per kilogram. When the appellant did not do so, she lodged a consumer complaint on grounds of

<sup>91</sup><https://indiankanoon.org/doc/75522969/#:~:text=The%20petitioners%20allege%20that%20the,health%20and%20seek%20appropriate%20direction.>

<sup>92</sup><https://www.lawweb.in/2014/05/compensation-to-consumer-who-complained.html>

<sup>93</sup>[https://blog.ipleaders.in/donoghue-v-stevenson-case-analysis/#Final\\_judgment](https://blog.ipleaders.in/donoghue-v-stevenson-case-analysis/#Final_judgment)

<sup>94</sup><https://www.casemine.com/judgement/in/5f3db9549fca1939964765a2/am>

<sup>95</sup><https://www.casemine.com/judgement/in/5e69d2373321bc624fea2d1e>

negligence and breach of contract which led to destruction of majority of her crop. The District Forum ruled that since the respondent did not qualify as a consumer with respect to the Consumer Protection Act, the complaint was not maintainable.

9. Food Safety Commissioner v. Anand Unni Krishnan & 2 Ors.<sup>96</sup>

The defendant was on charge for the display of insect infested food for sale. This was deemed a violation of Food and Safety Standards Act as well as the Consumer Protection Act, which amounted to unfair trade practice and deficiency of service on behalf of the 2 opposite parties. Section 3(1)(zz) IX defines unsafe food as an item infested with worms, weevils or insects, which was observed in this case. The Forum ruled parties 1 and 2 to pay 100000 rupees as compensation. The complainant, a government officer, was asked to pay 5000 rupees of compensation and 2000 rupees under costs as he should have initiated legal actions against the defendants.<sup>97</sup>

## CONCLUSION

In India, consumer protection and food security are major challenges. There is still a great deal to be done to guarantee that every citizen has access to healthy food at reasonable prices, irrespective of the efforts made by the government and other stakeholders. The government should address challenges to reinforce the current laws and rules that guarantee the security and safety of food. Also, people need to be made more aware of their rights and the value of making educated decisions regarding the food they eat. By supporting sustainable agriculture and putting ethical practises into place, the private sector may also play a significant role in this area. To ensure food security and consumer protection in India, a multi-stakeholder strategy involving the public sector, the commercial

sector, civil society organisations, and consumers is needed.

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