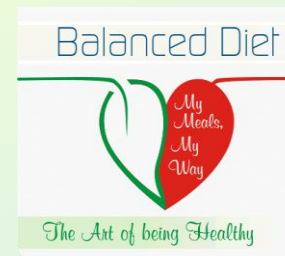


Non- Addition Claims Statement of Fact Dietary Guidelines

March 8, 2018



Non-addition Claims

“non-addition claim” means any claim that an ingredient has not been added to a food, either directly or indirectly. The ingredient is one whose presence or addition is permitted in the food and which consumers would normally expect to find in the food;

- Non-addition of Sugars
- Non-addition of Sodium Salts



Non-addition of Sugars



Non-addition of Sugars

Conditions-

1. No added sugar
2. No RM containing added sugar
3. No Foods naturally rich in sugar (sugar substitutes)
4. No Release of inherent sugar to levels beyond its natural contribution, using technological means

Schedule I –

- No added mono-or disaccharides or any other food used for its sweetening properties.
- Naturally present sugars: ‘CONTAINS NATURALLY OCCURRING SUGARS’.
- Sugar free: No more than 0.5 g sugar per 100 g or 100 ml.

Source- Codex Guidelines on Nutrition and Health Claims

Non-addition of Sodium Salts



Non-addition of Sodium Salts

Conditions

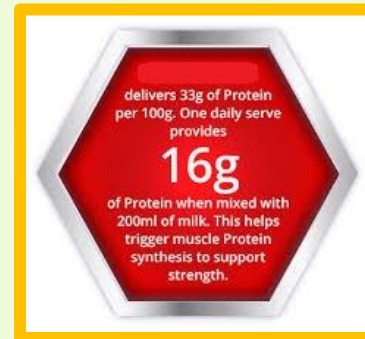
1. No added Sodium salts
2. No RM containing added Sodium salts
3. No Foods naturally rich in Sodium salts (Salt substitutes)

Schedule I-

- Sodium free : No more than 0.005g of sodium, or 0.0125 g of salt, per 100g

Source- Codex Guidelines on Nutrition and Health Claims

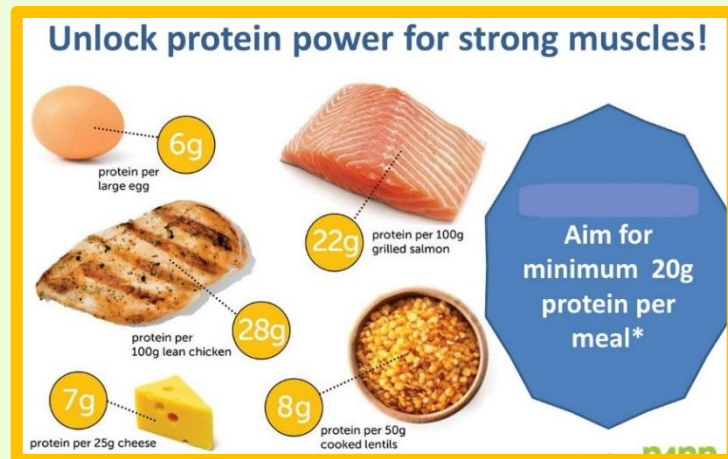
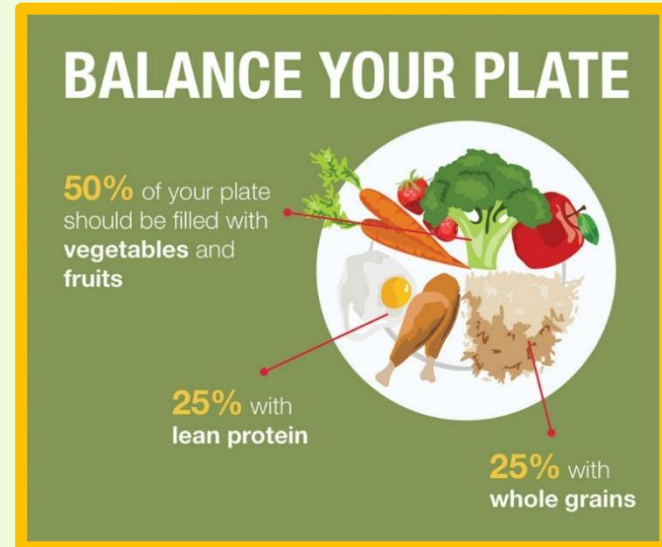
Statement of Fact



Statement of Fact

- Not a nutrient content claim as listed in schedule I
- Cannot use relative terms such as low, source, high etc.
- Source- Codex Guidelines on Nutrition and Health Claims

Claims relating to Dietary Guidelines



Claims relating to Dietary Guidelines

- Claims related to Healthy diet
 - a statement relating to the pattern of eating as per ICMR dietary guidelines.
 - satisfy the criteria for major nutrients related to the dietary guidelines
- Not allowed
 - Claims based on selective consideration of one or more aspects of the food.
 - Foods shall not be described as “healthy” or represented in a manner that food itself will impart health.

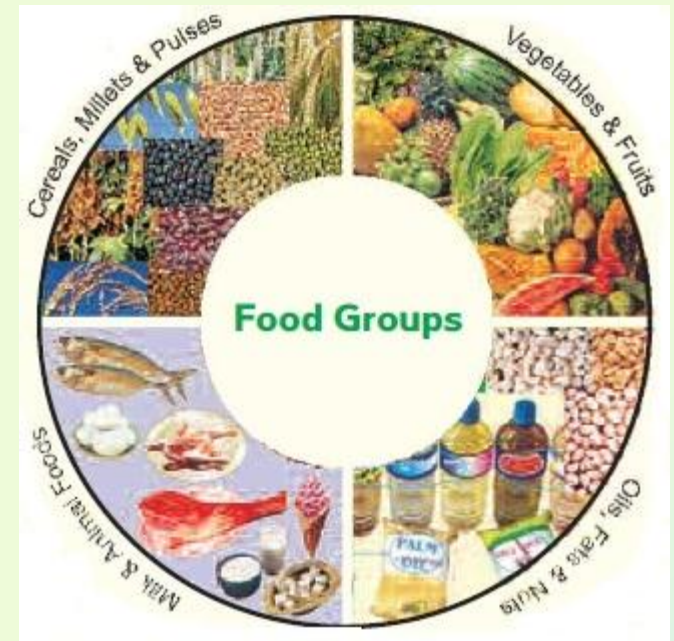
Dietary Principles

- An eating pattern represents the totality of all foods and beverages consumed.
- Healthy eating patterns support a healthy body weight and can help prevent and reduce the risk of chronic disease throughout periods of growth, development, and aging as well as during pregnancy.
- A healthy eating pattern limits: Saturated fats and trans fats, added sugars, and sodium
- A healthy eating pattern promotes: Balanced Diet

ICMR Dietary Guidelines

Balanced Diet:

A balanced diet is one which provides all the nutrients in required amounts and proper proportions. It can easily be achieved through a blend of the four basic food groups.



Balanced Diet for Adults - Sedentary/ Moderate/ Heavy Activity (Number of portions)

	Type of work						
	g/portion	Sedentary		Moderate		Heavy	
		Man	Woman	Man	Woman	Man	Woman
		No. of portions					
Cereals & millets	30	12.5	9	15	11	20	16
Pulses	30	2.5	2	3	2.5	4	3
Milk & milk products	100 ml	3	3	3	3	3	3
Roots & tubers	100	2	2	2	2	2	2
Green leafy vegetables	100	1	1	1	1	1	1
Other vegetables	100	2	2	2	2	2	2
Fruits	100	1	1	1	1	1	1
Sugar	5	4	4	6	6	11	9
Fat	5	5	4	6	5	8	6

To calculate the days requirement of above mentioned food groups for an individual, multiply grams per portion with number of portions.

Point to Ponder

Does it restricts the freedom of speech?

- The Supreme Court of India has held that “commercial speech”, forms part of the fundamental right to freedom of speech and expression recognised under Article 19(1)(a) of the Constitution of India. There should be less impediments in commercial speech...
- The promotion of a robust market for trade and commerce requires that the Courts grant some latitude to the advertisers in designing and crafting their pitch to the consumers and the tendency to scrutinize such advertisements with a magnifying glass must be eschewed unless of course the claims made are found to be totally unsubstantiated and to have no basis in reason or logic.
- MARICO VS ADANI WILMAR CS(OS) 246/2013

Thank you

Structure

1. Title

2. Definitions

3.1 General Principles

3.2 Nutrient Content & Nutrient Comparative Claims

3.3 Non-addition Claims

3.4 Health Claims

3.5 Claims related to Dietary Guidelines

3.6 Conditional Claims

3.7 Prohibited Claims

4. Approval of Claims

5. Redressal of non-compliance

6. Corrective Advertisement

Schedules I to V - Conditions of Claims