

File No. RCD-02001/112/2022-Regulatory-FSSAI  
Food Safety and Standards Authority of India  
(A statutory Authority established under the Food Safety and Standards Act, 2006)  
Regulatory Compliance Division  
FDA Bhawan, Kotla Road, New Delhi-110002

Dated: 23 January, 2023

To,

- (i) All the Commissioners of Food Safety
- (ii) All the Regional Directors, FSSAI

**Subject: Misleading products in market in name of "Ghee/Butter"- reg.**

Madam/Sir

1. It has come to the notice that Dairy Terms are being used by the certain FBOs for their Non-Dairy product like "Plant Based Ghee/Butter, Vegan Ghee/Butter etc." which are available in market and E-Commerce Platforms/websites. Such products are of non-animal origin and are usually the blend/mixtures of two or more edible oils/hydrogenated fats and natural identical flavors etc. Further, it has also been noticed that such products are also being sold deceptively as "Vegan-Ghee" whereas as per the provisions of Food Safety and Standards (Vegan Foods) Regulations, 2022, ghee, butter etc. cannot be claimed to vegan foods and the use of Vegan Food claim and Vegan Logo are permitted only after the prior approval of the Food Authority.

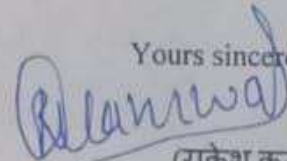
2. It is also clarified that as per sub-regulation 2.1.1(3)(f) of FSS (Food Product Standards and Food Additives) Regulations, 2011 regarding usage of dairy term, it is stated that "*In respect of a product which is not milk, a milk product or a composite milk product, no label, commercial document, publicity material or any form of point of sale presentation shall be used which claims, implies or suggests that the product is milk, a milk product or a composite milk product, or which refers to one or more of these products.*" Further, the sub-regulation 2.1.1(3) of FSS (Prohibition and Restriction on Sales) Regulations, 2011 "*no person shall either by himself or by any servant or agent shall sell ghee which contains any added matter not exclusively derived from milk fat.*"

4. In view of the above Regulatory provisions, it is requested to immediately check the labels of such products being manufactured and/or sold under your jurisdiction including on online platforms/websites and take enforcement actions against such FBOs who are selling such plant based products as ghee, Butter, etc. or making claims for Vegan Foods/Logo without prior approval of the Food Authority, as per the FSS Act, 2006 and Rules & Regulations made thereunder.

5. The action taken report in the matter may please be shared with this office at the earliest or latest by the 15.02.2023, so that the same may be apprised to the Competent Authority.

**(This issues with the approval of the Competent Authority)**

Yours sincerely,

  
(राकेश कुमार)

निदेशक (नियामक अनुपालन)

Copy for information to:

- i. ED (CS), FSSAI
- ii. Sr. PS to the CEO, FSSAI