

Nutrition labelling for fortified foods in Pakistan



Pakistan's Standards and Quality Control Authority mandates fortification of edible oil with vitamin A and has standards for iodised food grade salt and enriched wheat and self-rising flour.

At a provincial level, Sindh, Balochistan and Khyber Pakhtunkhwa, have introduced food fortification acts that mandate vanaspati ghee or edible oil with Vitamins A and D3; wheat flour, maida, suji and atta with iron, zinc, vitamin B12 and folic acid. Balochistan also mandates iodisation of edible salt. Punjab has drafted regulations that mandate fortification of similar staples, but it is understood the regulations are not yet promulgated.

1. TAKEAWAYS

Labels on fortified foods in Punjab need to include a nutrient declaration, but nutrient declarations are voluntary elsewhere in Pakistan. Fortified foods in Sindh, Balochistan and Khyber Pakhtunkhwa must include "minimum essential information about the food as specified by the Authority" (section 3). Foods labels can also include nutrition and health claims, that in some cases must meet conditions (section 4). In Sindh, Balochistan and Khyber Pakhtunkhwa fortified food labels must include a fortification logo, and in Punjab all foods require the Punjab Food Authorized Logo (section 5). On page 2, wheat flour is provided as a pictorial case study product (section 6) as well as a summary of key regulations (section 7) and links to further information (section 8).

2. GENERAL

- There is limited regulation of nutrition labelling in Pakistan, but where it is regulated, it is primarily regulated at the provincial level.
- Labelling cannot be false or misleading (e.g., to include B12 in the ingredients list of a food when there is no B12 in the food).
- Labels must be clearly visible and in English and Urdu.
- Food businesses are required to register with or be licenced by the relevant provincial Food Authority – and all fortified foods in Sindh, Balochistan and Khyber Pakhtunkhwa must also be registered with the relevant Food Authority (see links in section 7).

3. NUTRIENT DECLARATION

Nutrient declarations appear to be unregulated in most of Pakistan currently and are thus voluntary. In **Punjab**, nutrient declarations are mandatory on all pre-packaged food and need to:

- Include in the following order: Energy value (kcal or kJ), protein, carbohydrates (g), and fat (g), along with the total quantity of each vitamin or mineral.
- Express nutrients per 100 g/ml of food as sold, and per 100 g/ml of food ready to use, when prepared according to the instructions on the label. Nutrients may also be declared per 100 kcal or 100 kJ. When a claim is made, a statement of nutrient content in g or mg.

- Nutrient declarations should be legible, with font ≥ 3 mm in height, or ≥ 1 mm if the package is < 25 cm².

Food Fortification Acts in **Sindh, Balochistan and Khyber Pakhtunkhwa** require mandatorily fortified foods to be labelled with minimum essential information about the food as specified by the Food Authority. Advertisements must also provide essential information. No detail about the amount of information is contained in the legislation, but when issued by an Authority it may include a nutrient declaration.

4. NUTRITION AND HEALTH CLAIMS + FORTIFICATION CLAIMS

- You may include voluntary nutrition and health claims on the label of your products. If you are importing your product into Pakistan and wish to claim that it is a source of vitamins or minerals, you must register your product with the federal government prior to arrival alongside other importation requirements.

In **Punjab**:

- Any fruit or vegetable product claimed to be **fortified with vitamin "C"** shall contain ≥ 40 mg of ascorbic acid per 100 gm of product
- No food label can claim that the food is **enriched, fortified, vitaminized, supplemented or strengthened** or contain any statement that may or is likely to convey the meaning that the food is a source of a vitamin/s and/or mineral/s, unless the specific food outlined in the legislation contains \geq a specified amount of vitamin or mineral (e.g., 100 millilitres of wheat flour must contain $\geq 4,000$ I.U. of Vitamin A to make a claim that the wheat flour is fortified with Vitamin A) – which does not exceed the recommended daily dose in Codex Guidelines for Vitamins and Mineral Food Supplements (CAC/GL 55-2005). The claim must be written as: *"This food is (state e.g., enriched, fortified, vitaminized, supplemented or strengthened) with (state the vitamins or minerals or both and their amount in units per the regulation)."*
- Where a food is enriched with **essential amino acid and/or essential fatty acid**, a food label can claim: *"This food is (state the quality claim as aforesaid, e.g., enriched or supplemented) with (state the amount in milligram) of (state whether essential amino acid, essential fatty acid or both)."*
- "Source of energy" and "source of protein" claims can be made if they meet conditions (e.g., label includes the food quantity to be consumed in one day).
- Claims for a therapeutic or prophylactic action, that imply or suggest a food is recommended, prescribed or approved by medical practitioners, or using language indicating quality, superiority, pure, or similar implications, are prohibited.

5. SUPPLEMENTARY NUTRITION INFORMATION

Food Fortification Acts for Sindh, Balochistan and Khyber Pakhtunkhwa state that "An importer or a manufacturer shall display a fortification logo on the pack of

food as may be prescribed by the Food Authority”. However, no fortification logos were identified.

In Punjab, all foods require the Punjab Food Authorized Logo to demonstrate that the food meets labelling and other required food standards.

6. PICTORIAL CASE STUDY PRODUCT (USING EXAMPLES FROM DIFFERENT PROVINCES) – WHEAT FLOUR

This case study product only details the two nutrition label types outlined in this fact sheet – nutrient declaration and a fortification claim – along with a product name. Figures used are provided as an example only and may not be accurate. Other details are also required on food labels (e.g., ingredient list and weight) but not shown here.



7. MORE DETAIL ON THE LABELLING REGULATIONS

All provinces have acts that establish provincial food authorities, their powers and functions, set out offences for false and misleading food labelling and require food businesses to be licensed with the relevant authority:

- [Punjab Food Authority Act, 2011](#)
 - [Punjab Food Authority \(Product Registration and Display of PFA logo\) Regulations, 2017](#) sets out the requirement for every manufacturer, trader, importer, exporter or wholesaler who intends to store, import, transport, export, manufacture or sell a food in Punjab to obtain a certificate of product registration to demonstrate compliance with food safety, quality and labelling requirements. Once granted, the Punjab Food Authorized Logo must be used on the food product label after fee payment.
- [Balochistan Food Authority Act, 2014](#)
- [Khyber Pakhtunkhwa Food Safety Authority Act, 2014](#)
- [Sindh Food Authority Act, 2016](#)
- [Islamabad Capital Territory Food Safety Act, 2021](#)

All provinces (except Islamabad Capital Territory) also have acts that set out food fortification and other relevant requirements as specified:

- [The Punjab Pure Food Rules, 2011](#) sets out general requirements for food labelling requirements including that all labelling statements must be clearly legible and prominent, the label must include the license number, batch or lot number, and date marking; foods enriched or fortified with amino acids or fatty acids must be labelled with the name and amount added and must meet minimum standards; nutrition claims may be used for added nutrients, with conditions. Nutrients that may be added to foods are listed in this document. Food businesses must be licensed by the Food Authority; licences must be renewed annually and displayed on premises in a prominent place. Where nutrients are added to foods, the product must comply with the Codex Guidelines for vitamins and mineral supplement (CAC/GL 55-2005)

– [Punjab Pure Food Regulations, 2018](#) sets out specific requirements in Punjab province for food labelling, including the nutrient declaration and fortification claims. Includes standards for mandatory fortification.

- The [Sindh Food Fortification Act, 2021](#) mandates fortification of staple foods as above and applies to all such foods, including imports and exports and use in processed foods. It also specifies that all foods must be registered with the Sindh Food Authority and must include mandatory minimum information and a food fortification logo. The Food Authority can make further regulations re labelling and advertising among other things. The Act also provides powers for Food Safety Officers to inspect and investigate relevant sites, details enforcement action and a range of sanctions, and monitoring and evaluation of fortification and the efficacy of the Act.
- The [Khyber Pakhtunkhwa Food Fortification Act, 2022](#) is almost identical to the Sindh Food Fortification Act, save for referring to the appropriate Authority, and e.g., stating that manufacturers and others “may [in] advertising...provide true and accurate information” (it is unlikely that this is optional).
- The [Balochistan Food Fortification Act, 2021](#) is almost identical to the Sindh Food Fortification Act, save for referring to the appropriate Authority.

8. REGULATORS, USEFUL CONTACTS AND WHERE TO GET MORE INFORMATION

[The Punjab Food Authority](#), [Balochistan Food Authority](#), [Sindh Food Authority](#), [Khyber Pakhtunkhwa Food Safety & Halal Food Authority](#), and the [Islamabad Capital Territory Food Authority](#), implement the regulations above at the Provincial level.

The US Department of Agriculture’s (USDA) Foreign Agricultural Service issues a Food and Agricultural Import Regulations and Standards Country Report for Pakistan on a regular basis. See their [Pakistan country page](#) to access the latest report.

The Global Fortification Data Exchange’s [Pakistan Fortification dashboard](#) provides more detail about food fortification in the country.