

Pakistan

Food fortification

Pakistan's Standards and Quality Control Authority (PSQCA) has prescribed the mandatory fortification of edible oil with vitamin A via its Pakistan Standard Specification for Banaspati.¹²² The PSQCA also has standards for Iodized Food Grade Salt (PS:1669-2008), Enriched Wheat Flour and Self-r[aising] Wheat Flour (PS:4560-2000).¹²³

The *Punjab Pure Food Rules (2011)*¹²⁴ include levels of vitamins and minerals that must be in foods to state that a food is enriched, fortified, vitaminised, supplemented or strengthened. It also specifies which vitamins and minerals can be added to foods via a set of standards, such as fortified 'maida' and 'atta' (specific to wheat products) with one or more of iron, vitamin B1, B2, B3 and D3, and where nutrients are added to foods, the product must comply with the Codex Guidelines for Vitamins and Mineral Food Supplements (CAC/GL 55-2005). The subsequent *Punjab Pure Food Regulations (2018)*¹²⁵ clarify the required fortification in the province (that was confirmed by a local consultant to have been promulgated).

Similar regulations were not located in other provinces, but Khyber Pakhtunkhwa's Food Safety Authority Act does specify that the authority can regulate food fortification. Recent fortification regulations across Sindh (2021), Balochistan (2021) and Khyber Pakhtunkhwa (2022) mandate the fortification of staple foods. News reporting in June 2023 states the provinces are yet to implement the respective regulations.¹²⁶ The reporting also flags that federal legislation has stalled and is yet to be tabled in the Assembly. No similar regulations were identified in Islamabad Capital Territory.¹²⁶

A table detailing what is mandatorily vs voluntarily fortified across provinces is outlined below.

Fortification	Vegetable fats and oils	Wheat flour/maida and atta	Edible salt	Other
Pakistan (References as above)	Mandatory – vitamin A	Standard for Enriched Wheat Flour and Self-r[aising] Wheat Flour	Standard for iodised food-grade salt	-
Punjab Punjab Pure Food Rules (2011) ¹²⁴ Punjab Pure Food Regulations (2018) ¹²⁵	Mandatory (including margarines – vitamin A and D)	Mandatory (including bread, rolls and buns) – iron, zinc, vitamin B12 and folic acid	Voluntary – iodine	Voluntary fortification of a range of products, e.g., vitamin C in vegetable and fruit juices
Sindh The Sindh Food Fortification Act, 2021 ¹²⁷	Mandatory (specifically Vanaspati Ghee or Edible Oil) – vitamins A and D3	Mandatory (and Suji, Fine Atta) – iron, zinc, vitamin B12 and folic acid	-	-
Khyber Pakhtunkhwa The Khyber Pakhtunkhwa Food Fortification Act, 2022 ¹²⁸	Mandatory (specifically Vanaspati Ghee or Edible Oil) – vitamins A and D3	Mandatory (and Suji, Fine Atta) – iron, zinc, vitamin B12 and folic acid	-	-
Balochistan The Balochistan Food Fortification Act, 2021 ¹²⁹	Mandatory (specifically Vanaspati Ghee or Edible Oil) – vitamins A and D3	Mandatory (and Suji, Fine Atta) – iron, zinc, vitamin B12 and folic acid	Mandatory – iodine	-
Islamabad Capital Territory	-	-	-	-

Pakistan's Multisectoral Nutrition Strategy 2018-2025 also includes an intervention to improve food safety and quality, including through the public and private sectors working to improve foods' nutritional contents via improved regulation, monitoring and enforcement, to enable the fortification of salt, oil, flour and other foods.¹³⁰ The Strategy details key milestones in nutrition policy in Pakistan, including the 2011 introduction of wheat flour fortification with iron and folic acid at the federal level before devolution, and post-devolution, the provinces' development of policy guidance notes on nutrition and the adoption of multi/inter-sectoral nutrition strategies, alongside a 2017 launch of a Food Fortification Strategy that we were unable to locate.

Responsibilities and regulatory governance for nutrition labelling

The Pakistan federal government regulates and enforces food safety standards for food imports, while the provinces regulate food safety standards for domestic food products, even though provinces often adopt federal regulations.

Pakistan's labelling regulatory regime is largely governed at provincial levels and focuses on preventing false and misleading labelling and administering *pre- and post-market surveillance systems via provincial food business licensing systems*. More specifically, across all provinces of Pakistan (Punjab, Islamabad Capital Territory, Khyber Pakhtunkhwa, Balochistan, Islamabad and Sindh), provincial food authorities formulate standards, procedures, processes and guidelines on food safety. All these food authorities operate food safety enforcement regimes, such as serving improvement notices and cancelling or suspending food operator licences, through to fines and imprisonment. New food fortification Acts in three provinces require *food level (not food business level) pre- and post-market surveillance*.

Structure of nutrition labelling laws

Pakistan's nutrition labelling regulatory regime is structured as follows:

- The following acts 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*¹³¹
- *Punjab Food Authority (Product Registration and Display of PFA logo) Regulations, 2017*¹³² (out of scope for more in-depth review as not supplementary nutrition information) sets out the requirement for every manufacturer, trader, importer, exporter or wholesaler who intends to store, import, transport, export, manufacture, or sell 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)*¹³³
 - *Khyber Pakhtunkhwa Food Safety Authority Act (2014)*¹³⁴ in addition to the above, specifies that Khyber Pakhtunkhwa's Food Safety Authority can regulate food fortification.
 - *Sindh Food Authority Act (2016)*¹³⁵
 - *Islamabad Capital Territory Food Safety Act (2021)*¹³⁶
- *The Punjab Pure Food Rules (2011)*¹²⁴ set out general labelling requirements (e.g., all labelling statements must be legible and prominent, and the label must include the license number, batch or lot number, and date marking), including specific labelling and conditions for some fortified foods, alongside the use of nutrition claims, and the required food licensing with the Punjab Food Authority. Nutrient declarations are mandated only for infant formula.
 - *Punjab Pure Food Regulations (2018)*¹²⁵ prohibit false and misleading labelling and set out requirements for general labelling (e.g., statements must be clearly legible and prominent, in Urdu or English language), nutrient declarations, nutrition and health claims and prohibit some claims, e.g., that state or imply that the food is recommended, prescribed, or approved by medical practitioners. Fortification is also included as specified above. The use of a Punjab Food Authorized Logo is also mandated for all foods that are for sale, trade, import, export, and storage once a product is registered with the Punjab Food Authority after sampling and analysis.
- *The Khyber Pakhtunkhwa Food Fortification Act, 2022*¹²⁸ is almost identical to the Sindh Food Fortification Act (similar to mirror legislation in federations), save for referring to the appropriate Authority. We also note that the Act suggests businesses "*may while advertising...provide true and accurate information*", but we imagine this may be an issue of translation and that the regulations do not intend to make this an optional requirement.
- *The Balochistan Food Fortification Act, 2021*¹²⁹ is almost identical to the Sindh Food Fortification Act (similar to mirror legislation in federations), save for referring to the appropriate Authority. Other differences include that the Health Department 'may' conduct a provincial nutrition survey every five years and set timing for various reports to the Assembly.
- *The Sindh Food Fortification Act, 2021*¹²⁷ mandates the fortification of staple foods as above and applies to all such foods, including imports and exports and those used as ingredients 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 about food labelling and advertising. The Act also provides powers for Food Safety Officers to inspect and investigate relevant sites and details enforcement action and a range of sanctions. It also covers the requirements for monitoring and evaluating fortification via nutrition surveys, annual reports to the Provincial Assembly, and evaluation reports to examine the efficacy of the Act and the Authority's implementation.

Policy context and objectives

Pakistan's overarching food regulations generally aim to ensure food safety and standards. *Pakistan's Multi-sectoral Nutrition Strategy 2018-2025*¹³⁰ includes strategic objectives to regulate food labelling, inspection, and enforcement. Beyond this, we did not identify any documents that specifically identified how nutrition labelling policies in Pakistan were aligned with other health and nutrition policies.

Nutrition labels

Nutrient declarations are voluntary across most of Pakistan with no specific regulations found except in Punjab, where they are mandatory on all pre-packed food labels (with exceptions, such as meals served by caterers). Food Fortification Acts in *Sindh, Balochistan, and Khyber Pakhtunkhwa* state that mandatorily fortified foods must be labelled with minimum essential information about the food as specified by the Food Authority. This may include a nutrient declaration.

Nutrition and health claims: Little regulation of nutrition and health claims was found outside of Punjab. However, imported products that claim to be a source of vitamins and minerals need to be registered across Pakistan, and as provinces generally adopt federal regulations, this registration requirement is also likely to apply in the provinces. Punjab only allows nutrition claims that a food is enriched or fortified where a statement of the contents is included and other criteria around the amounts of micronutrients, for example, are met. It prohibits therapeutic or prophylactic claims on foods. Pakistani authorities generally consider explicit or implied claims as largely promotional tools and have not required them to be based on scientific evidence.

Supplementary nutrition information: Sindh, Balochistan, and Khyber Pakhtunkhwa all require mandatorily fortified foods to contain fortification logos on the pack. Punjab also mandates its Punjab Food Authorized Logo on all foods, which demonstrates a food meets labelling and other required food standards but does not provide any nutrition information to consumers.¹³²

Recommendations to reform nutrition labelling regulations to enable LSFF

- A programme of **regulatory strengthening across provinces and nationally** (to cover imported and domestically produced foods) that is based on best practice and provides consistency with deviations where appropriate, should include:
 - **Mandatory nutrient declarations (highest priority)** for all processed foods, including fortified foods. Aligned with best practice, the declaration should mandate the inclusion of fortificants where food is fortified in line with required standards. *Note that it is possible that the fortification Acts in Sindh, Balochistan, and Khyber Pakhtunkhwa will mandate declarations on fortified foods.*
 - A **voluntary standard fortification claim** and/or a **voluntary or mandatory fortification logo** could be considered for mandatorily fortified foods and should ideally be aligned nationwide, to help consumers more easily identify fortified foods beyond a label stating that food is enriched, fortified or supplemented with vitamins or minerals. A decision on whether to prioritise a logo or standard claims may depend, for example, on levels of consumer literacy. A logo may be more easily understood but should be accompanied by consumer education to promote its use. *Note that Punjab's regulations cover fortification claims, and the fortification acts in Sindh, Balochistan, and Khyber Pakhtunkhwa mandate fortification logos on fortified foods.*
 - At least **setting basic requirements for general claims** e.g., for nutrition claims such as 'source of' and **prohibitions on specific claims**. *Note that Punjab's regulations generally cover these basic requirements for and prohibitions on claims.*

Ideally, regulations across Pakistan would be aligned so as not to create internal and/or external trade barriers that could impede fortification efforts. The fortification acts in Sindh, Balochistan, and Khyber Pakhtunkhwa appear to seek to achieve this.

- Any changes to labelling regulations, in particular with logos, should be accompanied by strong consumer education to ensure that labelling regulations are effective. Changes would also require that regulatory oversight be expanded to cover the product level, as they currently only cover the food business level. Further, any changes to labelling regulations should carefully consider the requisite increase in resources and systems necessary to enable and ensure compliance. A step-wise approach to implementation could prioritise the most critical labelling elements first.
- While some aspects of **regulatory governance** were outlined clearly in provincial food authority acts (such as the authority to regulate and licence food businesses, funding, annual reports to government and enforcement regimes and responsibilities), increasing publicly available information on some aspects of governance (see Information Limitations above and detail in the table below) could contribute to this regulatory strengthening.

Information sources and limitations

We only undertook a desktop regulatory review in Pakistan. Little detail was found on the process of regulatory design and drafting, and aspects of monitoring, evaluation (e.g., guidelines), and enforcement (e.g., transparency) aside from in those provinces with recent food fortification regulations. Such information may sit outside of the regulatory documents reviewed or may have only been available in information published in Urdu.

Table 8 – PAKISTAN – Summary of nutrition labelling regulations

Excludes draft regulations unless specified.

Regulatory form and substance	Nutrient declaration	Nutrition and health claims	SNI
<p>Regulatory framework</p> <ul style="list-style-type: none"> Nutrient declarations are mandatory on all pre-packed food labels in Punjab Province (with exceptions, such as fruits and vegetables, and meals served by caterers).¹²⁵ Nutrient declarations are voluntary in all other provinces.¹³⁷ 	<ul style="list-style-type: none"> Nutrient declarations are mandatory on all pre-packed food labels in Punjab Province (with exceptions, such as fruits and vegetables, and meals served by caterers).¹²⁵ Nutrient declarations are voluntary in all other provinces.¹³⁷ 	<ul style="list-style-type: none"> Limited regulatory restrictions on nutrition or health claims¹³⁷ aside from provincial acts prohibiting false and misleading labelling. Punjab Province has a voluntary fortification statement (provided conditions are met) and prohibits certain claims.^{124, 125} None identified 	<ul style="list-style-type: none"> Sindh,¹²⁷ Balochistan,¹²⁹ Khyber Pakhtunkhwa,¹²⁸ require mandatorily fortified foods to contain fortification logos on the pack.
<p>Regulatory objective(s)</p>	<ul style="list-style-type: none"> None identified specific to labelling, but the Punjab Food Authority Act¹³¹ aims to protect public health and provide for safety and standards of food. Other food safety authority acts also specify aims to provide for safety and standards of food for example in Sindh.¹³⁵ 	<ul style="list-style-type: none"> None identified 	<ul style="list-style-type: none"> To promote the nutritional status and health of residents of [the province].^{127, 129, 128.}
<p>Operative terms and conditions</p>	<p>Punjab Province:</p> <ul style="list-style-type: none"> Nutrient declarations must include the following information in the following order:¹²⁵ <ul style="list-style-type: none"> energy value (kcal or kJ), protein, carbohydrates (g), and fat (g); total quantity of each vitamin or mineral; nutrients should be expressed per 100 g or 100 ml of food as sold, and per 100 ml of food ready to use when prepared according to the instructions on the label; nutrients may also be declared per 100 kcal or kJ. Information in declarations (including re-declarations for certain foods such as condensed milk) should be legible and the font should be $\geq 3\text{mm}$ in height, or $\geq 1\text{mm}$ if the package is $< 25\text{cm}^2$.¹²⁴ <p>Sindh Province,¹²⁷ Balochistan,¹²⁹ Khyber Pakhtunkhwa:¹²⁸</p> <ul style="list-style-type: none"> Mandatorily fortified foods must be labelled with minimum essential information about the food as specified by the Authority. Similarly, advertisements must provide essential information. No detail about what constitutes 'essential information' is contained in the legislation but this may reasonably include a nutrient declaration. 	<ul style="list-style-type: none"> Imported products claiming to be a source of vitamins or minerals must be registered with the federal government before arrival, jointly in the name of the importer and manufacturer.^{137, 138} Pakistani authorities consider claims (including implied claims) largely as promotional tools and do not require them to be based on scientific evidence.¹³⁷ <p>Punjab Province:¹²⁴ (noting that the Punjab Pure Food Regulations cover many of these same elements):</p> <ul style="list-style-type: none"> 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, vitaminised, supplemented or strengthened or contain any statement that may or is likely to convey the meaning that the food is a source of ≥ 1 vitamins and/or minerals 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 $> 4,000$ I.U. of vitamin A to 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 which: enriched, fortified, vitaminized, supplemented or strengthened) with (state the vitamins or minerals or both and their amount in units expressed per the regulation)." <ul style="list-style-type: none"> Where a food is enriched with essential amino acid and/or essential fatty acid, a food label can claim: "This food is (state 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, with conditions – e.g., that the label includes the quantity of food that can be consumed in one day.^{125, 124} The following are prohibited from being placed on food:^{124, 125} <ul style="list-style-type: none"> claims for a therapeutic or prophylactic action or similar, unless specified in the Act; statements or labelling that implies or suggests a food is recommended, prescribed or approved by medical practitioners; words indicating quality, superiority, pure, or similar implications. <p>Sindh Province,¹²⁷ Balochistan,¹²⁹ Khyber Pakhtunkhwa:¹²⁸</p> <ul style="list-style-type: none"> Advertisements for mandatorily fortified foods must protect the consumer from false and misleading claims (see comment about the specific wording in Khyber Pakhtunkhwa under Structure of Nutrition Labelling Laws above). 	<p>Sindh Province,¹²⁷ Balochistan,¹²⁹ Khyber Pakhtunkhwa:¹²⁸</p> <ul style="list-style-type: none"> An importer or a manufacturer shall display a fortification logo on the pack of a mandatorily fortified food as may be prescribed by the Authority.

Regulatory governance

Drafting regulatory rules and scheme design

- In Pakistan, the federal government regulates food imports, while domestic food products and related food standards are regulated at the provincial level. Provinces often adopt federal regulations, but some have developed their own regulations.^{137,138}
- Punjab Province: The Punjab Food Authority is responsible for food regulation, monitoring, and enforcement, including the development or adoption of food standards, procedures, processes, guidelines, testing procedures, and enforcement systems. The Authority includes representatives of government departments, the food industry, consumers, and food scientists. The Authority may establish scientific panels including relevant experts and food industry representatives to make recommendations to the Authority on standards, and guidelines.¹³¹
- Islamabad Capital Territory (ICT): The ICT Food Authority has the power to develop or adopt food standards, rules and regulations, procedures, processes, guidelines, testing procedures, and enforcement systems. The Authority includes representatives of government departments, food scientists, and industry.¹³⁶
- Khyber Pakhtunkhwa:
 - The Khyber Pakhtunkhwa Food Safety Authority is responsible for food regulation, monitoring, and enforcement, including the development or adoption of food standards, procedures, processes, guidelines, testing procedures, and enforcement systems. The Authority includes representatives of government departments, academia, the food industry, the Registered Farmers Association, and the Registered Consumers Association. Decisions are made by simple majority present and voting.¹³⁴
 - The Khyber Pakhtunkhwa Food Fortification Act, 2022¹²⁸ allows the Food Authority to make any regulations to give effect to the Act including for the labelling and advertising of fortified foods.
- Sindh Province:
 - The Sindh Food Authority is responsible for food regulation, monitoring, and enforcement, including the development or adoption of food standards, procedures, processes, guidelines, testing procedures, and enforcement systems. The Authority includes representatives of government departments, the food industry, one consumer representative, and one food scientist. Decisions are made by the majority present.¹³⁵
 - The Sindh Food Fortification Act, 2021¹²⁷ allows the Food Authority to make any regulations to give effect to the Act, including for the labelling and advertising of fortified foods, after publishing draft regulations for comment, inviting and resolving objections and suggestions.
- Balochistan Province:
 - The Balochistan Food Authority is responsible for food regulation, monitoring, and enforcement, including the development or adoption of food standards, procedures, processes, guidelines, testing procedures, and enforcement systems. The Authority includes representatives of government departments, the food industry, consumers, and food scientists. The Authority may establish scientific panels including relevant experts and food industry representatives to make recommendations to the Authority on standards and guidelines.¹³³
 - The Balochistan Food Fortification Act, 2021¹²⁹ allows the Food Authority to make any regulations to give effect to the Act, including for the labelling and advertising of fortified foods.

Administration

- The federal Ministries of Food, Science, Health, and Industry are involved in food control at the federal level, and food authorities/departments do the same at a provincial level.^{137,138}
- Under provincial food authority Acts, the relevant provincial Food Authority may formulate standards, procedures, processes and guidelines about any aspect of food labelling in each province.^{131,133-136}
- Punjab Province: The Punjab Food Authority is responsible for implementing food rules and regulations, licensing, enforcement, and training programmes, promoting awareness of food safety and standards, collecting and analysing scientific and technical data, and providing scientific and technical support to the government in matters relating to food. Funding for the Food Authority is specified.¹²⁵
- ICT: The ICT Food Authority has the power to specify procedures and guidelines for sampling, accrediting, training, and promoting food safety standards. Fines and fees collected fund the ICT Food Authority's activities.¹³⁶
- Khyber Pakhtunkhwa Province:
 - The Khyber Pakhtunkhwa Food Safety Authority is responsible for implementing food rules and regulations, licensing, enforcement, and training programmes, promoting awareness of food safety and standards, collecting and analysing scientific and technical data, and providing scientific and technical support to the government in matters relating to food. Funding for the Food Authority is specified.¹³⁴
 - The Khyber Pakhtunkhwa Food Fortification Act, 2022¹²⁸ mandates that all fortified foods be registered with the Food Authority and that manufacturers need to conduct quality assurance including on labelling. It also allows the Authority to issue detailed instructions to advertise fortified foods. The Authority can collect fees and fines under the Act for the Authority's Fund.
- Sindh Province:
 - The Sindh Food Authority is responsible for implementing food rules and regulations, licensing, enforcement, and training programmes, promoting awareness of food safety and standards, collecting and analysing scientific and technical data, and providing scientific and technical support to the government in matters relating to food. Funding for the Food Authority is specified.¹³⁵
 - The Sindh Food Fortification Act, 2021¹²⁷ mandates that all fortified foods be registered with the Food Authority, and that manufacturers need to conduct quality assurance including on labelling. It also allows the Authority to issue detailed instructions to advertise fortified foods. The Authority can collect fees and fines under the Act for the Authority's Fund.
- Balochistan Province:
 - The Balochistan Food Authority is responsible for implementing food rules and regulations, licensing, and enforcement. Funding for the Food Authority is specified.¹³³
 - The Balochistan Food Fortification Act, 2021¹²⁹ mandates that all fortified foods be registered with the Food Authority and that manufacturers conduct quality assurance, including on labelling. It also allows the Authority to issue detailed instructions to advertise fortified foods. The Authority can collect fees and fines under the Act for the Authority's Fund.

<p>Monitoring</p>	<ul style="list-style-type: none"> • Punjab Province: Food businesses must be licensed by the Food Authority; licences must be renewed annually and displaced on premises in a prominent place. The Punjab Food Authority may refuse to issue or renew a licence if the business does not fulfil the requirements of the Act.^{124, 131} • ICT: Food businesses must be licensed by the ICT Food Authority.¹³⁶ • Khyber Pakhtunkhwa Province: <ul style="list-style-type: none"> - Food businesses must apply and obtain a licence which is valid for two years from the Food Safety Authority, subject to payment of fees. The Food Safety Authority may refuse to issue or renew a licence if the business does not fulfil the requirements of the Act.¹³⁴ - The Khyber Pakhtunkhwa Food Fortification Act, 2022¹²⁸ allows Food Safety Inspectors to inspect and investigate any site where fortified food is manufactured, stored, sold, transported, distributed, or located. They can also stop and search any vehicle used to transport fortified food. The Authority may also make mandatory electronic recordings of food inspections, sampling, and seizure. The Authority may establish or recognise food laboratories or mobile laboratories to analyse fortified food samples or equipment used for food fortification. In some cases, Food Safety Officers can be directed by a Court to have a sample tested by such laboratories. • Sindh Province: <ul style="list-style-type: none"> - The Food Authority may refuse to issue or renew a licence if the business does not fulfil the requirements of the Act.¹³⁵ - The Sindh Food Fortification Act, 2021¹²⁷ allows Food Safety Inspectors to inspect and investigate any site where fortified food is manufactured, stored, sold, transported, distributed, or located. They can also stop and search any vehicle used to transport fortified food. The Authority may also make mandatory electronic recordings of inspections, sampling and seizure. The Authority may establish or recognise food laboratories or mobile laboratories to analyse fortified food samples or equipment used for food fortification. In some cases, Food Safety Officers can be directed by a Court to have a sample tested by such laboratories. • Balochistan Province: <ul style="list-style-type: none"> - Food businesses require registration or a valid licence from the Food Authority to operate. A Food Safety Officer may issue an improvement notice and suspend or cancel a food operator's license if they fail to comply with the terms of this notice.¹³³ - The Balochistan Food Fortification Act, 2021¹²⁹ allows Food Safety Inspectors to inspect and investigate any site where fortified food is manufactured, stored, sold, transported, distributed, or located. They can also stop and search any vehicle used to transport fortified food. The Authority may also make mandatory electronic recordings of inspections, sampling and seizure. The Authority may establish or recognise food laboratories or mobile laboratories to analyse fortified food samples or equipment used for food fortification. In some cases, Food Safety Officers can be directed by a Court or the Authority to have a sample tested by such laboratories.
<p>Evaluation</p>	<ul style="list-style-type: none"> • Punjab Province: The Food Authority must submit annual reports on its previous and planned work and activities to the government which must be tabled in Parliament. The Authority must also submit three monthly reports to the government on performance, particularly regarding public health protection, food safety and standards, and related actions after which the government can issue directions to the Authority. The Auditor General of Pakistan must audit the Food Authority annually.^{125, 131} • ICT: The ICT Food Authority must submit annual reports on its previous and planned work and activities to the government which must be tabled in Parliament. The Auditor General of Pakistan must audit the ICT Food Authority annually.¹³⁶ • Khyber Pakhtunkhwa Province: <ul style="list-style-type: none"> - The Khyber Pakhtunkhwa Food Safety Authority must submit annual reports on its previous and planned work and activities to the government which must be tabled in Parliament. The Auditor General of Pakistan must audit the Food Safety Authority annually.¹³⁴ - The Khyber Pakhtunkhwa Food Fortification Act, 2022¹²⁸ The government may conduct a provincial nutrition survey of the status of specific micronutrients among Khyber Pakhtunkhwa residents every five years, with the Act detailing requirements, and it may conduct the first survey within three years of the Act's commencement. The Authority must also report annually to the government and Provincial Assembly on the implementation of food fortification regulation, including registration, compliance assessment, instances of violations, and enforcement actions. • Sindh Province: <ul style="list-style-type: none"> - The Sindh Food Authority must submit annual reports on its previous and planned work and activities to the government that must be tabled in Parliament. An auditor The Auditor General of Pakistan must audit the Sindh Food Authority annually.¹³⁵ - The Sindh Food Fortification Act, 2021¹²⁷ The government may conduct a provincial nutrition survey of the status of specific micronutrients among Sindh residents every three to five years, with the Act detailing requirements, and may conduct the first survey within five years from the Act's commencement. The government sets the Authority's key performance indicators and can conduct annual monitoring and evaluation of the Authority to review the efficacy of the Act. The Authority must provide the monitoring agency access to all reports to allow for monitoring and evaluation, the reports for which must be submitted to the Provincial Assembly on the implementation of food fortification regulation, including registration, compliance assessment, instances of violations and enforcement actions. The Assembly can refer the report to the relevant Standing Committee and can approve any of the committee's recommendations to improve fortification. • Balochistan Province: <ul style="list-style-type: none"> - The Balochistan Food Authority must submit annual reports on its previous and planned work and activities to the government which must be tabled in Parliament. An auditor must review the Authority's accounts and records annually.¹³³ - The Balochistan Food Fortification Act, 2021¹²⁹ The government may conduct a provincial nutrition survey of the status of specific micronutrients in residents every five years, with the Act detailing requirements. The government sets the Authority's key performance indicators and can conduct annual monitoring and evaluation of the Authority to review the efficacy of the Act. The Authority must provide the monitoring agency access to all reports to allow for monitoring and evaluation, the reports for which must be submitted to the Provincial Assembly on the implementation of food fortification regulation, including registration, compliance assessment, instances of violations and enforcement actions.

Enforcement

- Provincial governments are responsible for the enforcement of domestic food products, while food imports are enforced at the federal level.^{137,138}
- Punjab Province: The Punjab Food Authority can appoint public analysts for testing and food inspectors/food safety officers, who have the power to enter and search any food premises, examine, sample or seize food products, examine or request any documents, identity card, business registration certificate, or licence from a food operator. Sampling methods are prescribed in the Punjab Pure Food Rules (2011). Complaints can be made in writing, which are investigated by food inspectors. Food inspectors may serve improvement notices for failure to comply with the provisions of the Punjab Food Authority Act. Failure to comply with the improvement notice may result in the Food Authority cancelling or suspending the food operator's licence or other action. False labelling offences may be subject to fines of 500,000 to 1 million Pakistani rupees and/or imprisonment of six months to 12 months. An order may be imposed to prohibit a food operator from conducting or operating a food business, or the use of equipment and premises. The Food Authority may refuse to issue or renew a licence if the business does not fulfil the requirements of the Act.^{124,125} Similar penalties are also set out in the Punjab Pure Food Regulations (2018).¹²⁵
- ICT: Food Authority officers have the authority to conduct enforcement activities. Food safety officers have the power to enter and search any food premises, examine, sample or seize food products, and examine or request any documents, identity card, business registration certificate, or licence from a food operator. Penalties are established for offences in ICT. False or misleading labelling may result in a fine of up to 500,000 Pakistani rupees and/or imprisonment of up to one year. Penalties are higher for subsequent offences and the licence of the food operator will be cancelled. If convicted, details of the offence may be published in newspapers.¹³⁶
- Khyber Pakhtunkhwa Province:
 - Food safety officers have the power to enter and search any food premises, examine, sample or seize food products, and examine or request any documents, identity cards, business registration certificates, or licences from food operators. A food safety officer may order prosecution, suspend or cancel a licence, impose a fine, issue an improvement notice, or order the recall of a product from the market. False labelling offences may be subject to fines of 100,000 to 1 million Pakistani rupees. An order may be imposed to prohibit a food operator from conducting or operating a food business, or the use of equipment and premises. The Food Safety Authority may refuse to issue or renew a licence if the business does not fulfil the requirements of the Act.¹³⁴
 - The Khyber Pakhtunkhwa Food Fortification Act, 2022¹²⁸ allows food safety inspectors to seize fortified foods that contravene the Act, and seal premises for up to seven days. Where analysis shows that a food is not sufficiently fortified, a food safety officer must serve an improvement notice on the relevant person directing immediate remedy of the deficiency. The Authority can also order the withdrawal of a non-fortified food that is subject to mandatory fortification. If the person does not comply with an improvement notice or violates other provisions of the Act, penal action can be initiated against them, ranging from fines, suspension or cancellation of registration, and other penalties to remedy the issue (such as the destruction of food or directions for reprocessing food), to imprisonment where a person fails to apply for required registration, and other court-imposed sanctions. The Authority must make regulations to ensure fair enforcement procedures.
- Sindh Province:
 - Food safety officers have the power to enter and search any food premises, examine, sample or seize food products, and examine or request any documents, identity cards, business registration certificates, or licences from food operators. A food safety officer may issue an improvement notice and suspend or cancel a food operator's licence if they fail to comply with the terms of the notice. False labelling offences may be subject to fines of up to 1 million Pakistani rupees and/or imprisonment of up to six months. An order may be imposed to prohibit a food operator from conducting or operating a food business, or the use of equipment and premises. The Food Authority may refuse to issue or renew a licence if the business does not fulfil the requirements of the Act.¹³⁵
 - The Sindh Food Fortification Act, 2021¹²⁷ allows food safety inspectors to seize fortified food that contravenes the Act, and seal premises for up to seven days. Where analysis shows that a food is not sufficiently fortified, a food safety officer must serve an improvement notice on the relevant person directing immediate remedy of the deficiency. The Authority can also order the withdrawal of a non-fortified food that is subject to mandatory fortification. If the person does not comply with an improvement notice or violates other provisions of the Act, penal action can be initiated against them, ranging from fines, suspension or cancellation of registration, and other penalties to remedy the issue (such as the destruction of food or directions for reprocessing food), to imprisonment where a person fails to apply for required registration, and other court-imposed sanctions. The Authority must make regulations to ensure fair enforcement procedures.
- Balochistan Province:
 - The Food Authority can appoint public analysts for testing and food safety officers who have the power to enter and search any food premises, examine, sample or seize food products, examine or request any documents, identity cards, business registration certificates, or licences from food operators. A food safety officer may issue an improvement notice and suspend or cancel the food operator's licence if they fail to comply with the terms of the notice. An order may be imposed to prohibit a food operator from conducting or operating a food business, or the use of equipment and premises, or the Authority can order the immediate withdrawal of a product from the market. False labelling offences may be subject to fines of up to 1 million Pakistani rupees or imprisonment for up to five years. Offences are higher for subsequent offences. If convicted, details of the offence may be published in newspapers.¹³³
 - The Balochistan Food Fortification Act, 2021¹²⁹ allows food safety inspectors to seize fortified food that contravenes the Act, and seal premises for up to seven days. Where analysis shows that a food is not sufficiently fortified, a food safety officer must serve an improvement notice on the relevant person directing immediate remedy of the deficiency. The Authority can also order the withdrawal of a non-fortified food that is subject to mandatory fortification. If the person does not comply with an improvement notice or violates other provisions of the Act, penal action can be initiated against them, ranging from suspension or cancellation of registration, and other penalties to remedy the issue (such as the destruction of food or directions for reprocessing food), up to imprisonment where a person fails to apply for required registration, and other court-imposed sanctions. The Authority must make regulations to ensure fair enforcement procedures.

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