

Report on Supply of Packaged Edible Products without Required Labeling

1. Abstract

This report investigates the compliance of grocery stores in Bhutan with product labeling requirements as stipulated in the Consumer Protection Rules and Regulations (CPRR) 2015. The study encompasses market inspections across 880 grocery stores in 17 Dzongkhags.

The study reveals that 26% of the stores surveyed display products with inadequate or no labeling. Locally packaged products often lack proper labeling. Similarly, imported products frequently feature labels in foreign languages, primarily Korean and Thai, without required translations into Dzongkha or English.

The findings underscore the critical role of product labels in ensuring consumer safety, quality, and informed decision-making. Inadequate labeling compromises these aspects, particularly affecting vulnerable populations such as children and illiterate consumers. The report emphasizes the need for stringent enforcement of labeling standards to protect consumer rights and health.

2. Background

Labels are an essential aspect of consumer products, providing vital information that helps to ensure safety, quality, value for money and other vital information for consumers. By understanding the different components of product labels, consumers can better make their choices and gain confidence in the products they buy. Consumer safety is key. Consuming food which are spoilt because of being stored or unused for too long past expiry date or containing ingredients to which a consumer is allergic to have severe repercussions and can be prevented by use of proper labelling.

The variety and diversity of consumer goods including locally produced or manufactured ones is increasing rapidly. Along with products that are properly packaged and labelled, very rudimentarily packaged with little or no label products appears in the market. At the same time, imported products from countries such as Thailand and Republic of Korea with labeling using their

language and not in English are increasingly found in Bhutanese markets. Therefore, products, particularly edible products with inadequate or no labels poses grave risks to consumers.

This study therefore aims to document the extent of this issue and issue recommendations to improve this information vacuum for the benefit and safety of Bhutanese consumers.

3. Method and Materials

Information collected during the regular surveillance of different markets throughout the country in the last one year is used to determine the extent of the labelling issue. In total, 880 grocery stores across 17 dzongkhags were covered. The most common and popular food products were considered, including products such as noodles, crisps, juice & beverages, biscuits, sweets and candies.

4. Findings and Discussion

There are many sources of edible packaged food. The most common source of food products is India. Packaged food products from Thailand and Republic of Korea are also becoming increasingly popular amongst Bhutanese consumers. With the increase in the number of domestic cottage and small industries, locally produced food such as pickles, jams, honey, dehydrated fruits and vegetables and yoghurt are increasingly sold. Further, farmers products such as ground maize, dried vegetables and mushrooms, roasted maize, rice and flours also increasingly found. Furthermore, some people also buy imported food such as sugar, flour and lentils in bulk from wholesalers such as the Food Corporation of Bhutan (FCB) and pack into small retail packs.

26% of the grocery stores were dealing in food products that were inadequately labelled or had no labels at all. Consumer Protection Rules and Regulation 2015 (Section 19) requires “Products which are manufactured for sale or offered for sale in Bhutan, or imported for sale in Bhutan shall be labeled as per standards on labeling prescribed by relevant agencies of the government including but not limited to information prescribed under rule 22 or as per international standards on product

labeling”. Further Section 22 of the CPRR 2015 stipulates following minimum labeling requirements:

1. Trade or brand name,
2. Trademark,
3. Business name,
4. Address of the manufacturer, importer or re-packer of the product in Bhutan,
5. Ingredients and compositions,
6. Net weight, measure or numerical count,
7. Country of manufacture, and
8. Date of manufacture and expiry date

The most common locally packaged or repackaged products without any labeling are (*zaw, seep*, local rice, *kharang*, locally produced crisps, sausages, cookies and dried vegetables such as chili, mushroom, pumpkin, eggplant and spinach.

Packaged food products imported from Korea and Thailand does not contain labels in English but only in their language. Though Bhutan Food & Drug Authority (BFDA) rules necessitates importers/ distributors to translate basic information into English and affix on the package, this practice does not appear to be stringently enforced. Likewise, Section 25 of CPRR, 2015 also states that where labeling is in languages other than Dzongkha and English, the same information is required to be translated into Dzongkha or English and affixed on products or the shelf.

It is crucial to educate, encourage and support local producers and re-packers (into retail packs) about the importance of truthful and genuine labelling. Relevant agencies under the MOICE and MOAL while promoting and helping establishment of processing and re-packing enterprises educate them on the need for proper labeling and what basic information it should cover. Further, it is not very expensive, poor farmers, or someone without adequate financial resources starting a home venture could be provided technical and financial support to develop labels and get access to simple labelling devices.

The relevant regulatory agencies (DRC & BFDA) at the entry point should monitor import of products to see they meet labeling standards, particularly those products that have a shorter shelf life and spoil easily and necessitate importers to ensure proper labelling in English and/ or Dzongkha, if such products come with labels in foreign language.

Relevant agencies such as the CCAA and BFDA should monitor businesses to ensure labeling compliance and also educate them on the need to label properly. Though the entire information outlined in the CPRR, 2015 is desirable, for ease and practicality, the most critical information such as ingredients used, the date of production, net weight and the price should suffice particularly for small farmers and re-packers.

One common problem for small processors and re-packers is to determine the expiry date of a food product. Relevant agencies of the MOAL and MOH need to educate them on how to determine the date of expiry of any given product.

CCAA need to continue consumer advocacy on the need to check the labels to see if it meets their requirement and report to the CCAA for intervention if it does not.

5. Conclusion

Providing genuine and proper information to consumers for prudent purchase decision is one of the most important parameters for consumer protection. The cost of meeting the regulatory requirement of labelling is not much and can be complied by all. Monitoring for compliance must be used in tandem with advocacy, education and support.