

Centre for Health Equity (CHE)

Advanced Study Institute of Asia

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Date: 11 August 2026

To
Hon'ble Member
Shri Priyank Kanoongo
National Human Rights Commission (NHRC)
New Delhi

Subject: Representation regarding consumer protection, food safety and regulatory enforcement concerning dairy analogues sold or served as paneer in India

Respected Sir,

The Advanced Study Institute of Asia (ASIA), Centre for Health Equity (CHE), respectfully submits this representation for the kind consideration of the National Human Rights Commission regarding the sale, supply and use of dairy analogues, particularly paneer analogues, in India.

Our concern is not with the lawful manufacture or sale of dairy analogues as such. Rather, it relates to situations where such products are represented, supplied or served as conventional paneer without clear and adequate disclosure. Such practices may prevent consumers from making informed choices about the identity, composition and nutritional characteristics of the food they purchase or consume. The issue is particularly relevant in the Hotel, Restaurant and Catering (HoReCa) sector, where consumers may have limited visibility into the ingredients or composition of food served to them.

The Food Safety and Standards Authority of India (FSSAI) has addressed dairy analogues within its regulatory framework and has taken steps concerning their nomenclature, labelling and disclosure. Its April 2026 West Region public notice specifically addressed the use and display of cheese analogues in food-service establishments and stated that selling or serving a cheese analogue as paneer constitutes a violation. At the same time, the enclosed briefing note indicates that publicly available evidence on implementation and enforcement remains uneven across jurisdictions.

Recent state-level actions further demonstrate the importance of this issue. Maharashtra reported that 109 of 308 paneer and dairy-analogue samples tested between April 2025 and March 2026 were non-compliant, while Chhattisgarh and Gujarat have also taken regulatory action. However, comparable publicly accessible, state-wise information on analogue-focused testing and enforcement remains limited in several other States and Union Territories.

From a health-equity and consumer-rights perspective, the central concern is therefore not the existence of an alternative food product, but whether consumers across India are equally able to understand what they are purchasing or being served. Where naming, disclosure and enforcement practices differ by State, establishment or point of purchase, consumers may have unequal access to information.

The issue also raises a broader question of nomenclature and consumer understanding. FSSAI has itself considered terminology for dairy analogues, including the use of terms such as “Analogue of Paneer” or “Non-dairy” before a dairy term. This raises the question of whether such qualifiers provide sufficient clarity to consumers, or whether a distinct nomenclature may be necessary where continued use of the identity “paneer” could create confusion between a milk-derived product and a non-dairy analogue.

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In this context, ASIA respectfully requests the Commission to take cognizance of the matter and, within its mandate, consider seeking information from FSSAI and the concerned State/UT authorities regarding the following:

1. Implementation of existing requirements relating to the naming, labelling and disclosure of dairy analogues, particularly where analogue products are supplied or served as paneer;
2. State-wise surveillance and enforcement, including the number of samples tested, instances of non-compliance, inspections undertaken, and action taken in cases involving misrepresentation of analogue products;
3. Compliance within food-service establishments, including restaurants, caterers, institutional kitchens and, where applicable, digital food-ordering platforms;
4. Laboratory and enforcement capacity, including whether differences in staffing, testing facilities or administrative capacity may be affecting consistent implementation across States and Union Territories; and
5. Consumer information and awareness measures, including steps to ensure that consumers can clearly distinguish between milk-derived paneer and dairy analogues at the point of purchase or consumption.

We further request that the Commission may, where considered appropriate, seek a status report from the FSSAI and the concerned State/UT authorities on the implementation and enforcement of the applicable regulatory framework, including measures being taken to ensure consistent disclosure, nomenclature and consumer awareness across the country.

The enclosed briefing note, "Analogue Paneer in India: A Food-Systems Threat to Health Equity", provides supporting analysis of the regulatory framework, available testing and enforcement evidence, consumer-information concerns and the implications of differences in implementation.

We respectfully submit this representation for the Commission's consideration and appropriate action within its mandate.

Thank you.

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