Journal of the Postgraduate Institute of Medicine 2026; 13(1): E301 1-13

https://doi.org/10.4038/jpgim.8618

Review

Doctrinal analysis of food safety governance mechanisms in international model food law and food acts of India, Bangladesh and Sri Lanka

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Key words: Model Food Law, Food Safety, Food Law, Food Act

Abstract

Background and Objective

Food safety laws play a critical role in protecting public health, ensuring consumer confidence, and facilitating fair trade in food systems. With increasing globalization of food supply chains, urbanization, and dietary transitions, the risks associated with unsafe and unhealthy food have become more complex and far-reaching, especially in South Asian context. Law is the key strategy in counteracting this challenge; thus, countries have enacted food laws, and the International Model Food Law of the Food and Agricultural Organization serves as a guiding document in drafting food laws.

Methods

This article examines the International Model Food Law and food safety laws in three South Asian countries: Sri Lanka, India and Bangladesh, with particular emphasis on their governing frameworks namely authority, advisory body, intersectoral coordination, law enforcing officers and food analysis.

Results

Unlike in Sri Lanka, the Indian and Bangladesh authorities, as suggested in the Model Food Law, are multi sectoral and lies outside the health department, appointed by the politicians directly or indirectly. Unlike in Indian, Bangladeshi and International law, the Sri Lankan law does not have a dedicated officer to implement food safety laws. The Indian Act gives a strict mechanism to control and supervise law enforcing officers by regulating appointment, dismissals, appeals, complaints and investigations. India regulates both laboratories and analysists while providing a more detailed sampling procedure, compared to other jurisdictions.

Conclusion and Recommendation

Political independence, stakeholder coordination, implementation and monitoring mechanisms are weak and need to be revisited and strengthened in the International Model Food Law and the Food Acts of Sri Lanka and Bangladesh. The Indian Food Safety and Standard Act is comparatively strong. A technically sound and politically independent authority model with strict implementation and monitoring mechanisms would be the ideal model for South Asian countries.

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Received: 31 Dec 2025, Accepted revised version: 29 Mar 2026, Published: 26 Nov 2026

Competing Interests: Authors have declared that no competing interests exist

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Introduction

Food safety has become a pressing global issue, closely linked to public health, international trade, and sustainable development. The World Health Organization (WHO) estimates that unsafe food causes approximately 600 million cases of foodborne illness and 420,000 deaths annually, with a disproportionate burden in low- and middle-income countries [1].

Legislation is the cornerstone of food safety governance. It establishes the legal authority, administrative structures, and enforcement mechanisms required to protect consumers and ensure fair practices in food trade. To support countries in modernizing their food safety frameworks, the Food and Agriculture Organization (FAO) has developed the *International Model Food Law*, which provides a reference for building comprehensive, science-based, and harmonized food legislations [2].

South Asian countries, including India, Bangladesh, and Sri Lanka have enacted food safety legislations in recent decades—such as India's *Food Safety and Standards Act of 2006* [3], Bangladesh's *Food Safety Act of 2013* [4], and Sri Lanka's *Food Act of 1980* [5] as amended. While these laws represent significant progress, differences exist in terms of institutional arrangements, enforcement mechanisms, and alignment with international best standards. These divergences may hinder regional cooperation and affect compliance with global trade requirements.

The aim of this study was to uncover the alignment of the food safety governance mechanisms in the International Model Food Law with the regulatory frameworks of India, Bangladesh, and Sri Lanka based on analyzing their similarities and differences.

Objectives

1. to examine and compare the governance mechanisms embedded in the food safety laws of International Model Food Law, India, Bangladesh, and Sri Lanka.
2. to identify gaps, inconsistencies, and areas of alignment between the International Model Food Law and the national food acts, and propose recommendations for strengthening food safety governance.

Justification

Analyzing the administration of food safety through the lens of national legislations in South Asia is crucial for several reasons. First, it helps identify structural gaps and overlaps that weaken enforcement and accountability. Second, benchmarking these legislations against the *International Model Food Law* provides an evidence base for legal and institutional reforms that can enhance transparency, efficiency, and consumer confidence. Third, greater alignment with international models can facilitate regional harmonization, thereby improving cross-border trade, strengthening collective food security, and ensuring compliance with World Trade Organization (WTO) and Codex Alimentarius standards. Finally, by providing a comparative perspective, this research can support policymakers, regulatory authorities, and development partners in designing

more coherent and effective food safety systems, ultimately reducing the burden of foodborne disease and improving public health outcomes in the region.

India, Bangladesh, and Sri Lanka were selected for this study due to their shared regional, legal, and socio-economic contexts within South Asia, which make them suitable for a meaningful doctrinal comparison of food safety governance mechanisms. These countries have comparable public health challenges, including foodborne diseases, informal food sectors, and evolving regulatory capacities, thereby providing a common ground for analysis.

Sri Lankan and Indian Food Acts have been analyzed and compared by previous researches [6]; however, more international comparisons are required to learn from best practices.

Methodology

This study adopted a documentary review approach to analyse the administration of food safety in the legislations of selected South Asian countries and assess their consistency with the *International Model Food Law*. Relevant primary sources included national food legislations, amendments, regulations, and policy documents from India, Bangladesh, and Sri Lanka, Secondary sources, included reports from the Food and Agriculture Organization (FAO), World Health Organization (WHO), Codex Alimentarius Commission. Peer-reviewed journal articles, were also reviewed to provide context and interpretation. A structured review matrix was developed to extract and compare key elements of food safety administration—such as institutional arrangements, enforcement mechanisms, risk assessment provisions, consumer protection measures, and transparency requirements—across countries. These elements were then benchmarked against the principles and provisions outlined in the *International Model Food Law*. The analysis focused on identifying consistencies, gaps, and divergences, thereby providing evidence for harmonization and policy recommendations.

Results

Authority

The authority is defined as the administrative arm of the governing mechanism which provides logistic support and guidance to implementing laws [7]. The *International Model Food Act* [2], by its Section 3, recognizes an authority as a corporate body called the "Food Control Authority". The Authority is headed by an Executive Director who is the chief executive officer of the Authority. The appointment mechanism of the members is not stated. The Executive Director of the authority is appointed by the minister; therefore, practically, he will be under political influence. Legislations (regulations, orders, etc..) and policies are drafted by this authority and it has the responsibility of ensuring the implementation of the Act by monitoring and logistic supply. Food Control Authority is the body responsible for food safety in the country. The minister can issue directions to the Authority on its function and can even dissolve the Authority if it fails to comply with to such directives. This type of politically dependent model may not be the ideal for South Asian Countries where politicians have close connections with food industries and are

generally corrupt. This type of authority is not really independent in a practical sense, although it is stated to be independent in the document.

India is a semi-federal (federal union) country, with a central government and 28 states (and 8 union territories). The Indian 'authority' is established under Section 4 of the *Food Safety and Standard Act* [3] of India (FSSAI). Since India is a federal union, the FSSAI cannot directly get involved in food safety activities at state level, which warrants another sub-authority at state level. The 'Commissioner of Food Safety' (Section 30 of the Act) who is appointed by each state to monitor the enforcement of the Act within the state, functions as the authority in the state. Therefore, in India, food safety authorities are at three levels (table 1)

Table 1: Authorities in India

Administrative level	Authority	Appointed by
Central	Food Safety and Standard Authority of India	Central Government
State	Commissioner of Food Safety	State Government
District	Designated Officer	Commissioner of Food Safety

The Food Safety and Standard Authority of India (FSSAI) is a body corporate that consists of a Chairperson, Chief Executive Officer (CEO) and other 21 members in various ministries and fields related to food safety, out of which one-third are women. All members, including the Chairperson, are appointed by the central government on recommendation of a selection committee. This five-member selection committee is chaired by the Cabinet Secretary and consists of Secretary level officers and a food technologist appointed by the central government. Since the members are appointed by a selection committee, the FSSAI is independent from political and industrial influence to a reasonable extent. The central government can, at any time, remove the chairperson or any member by an order. Indian food regulations are made by the FSSAI. The FSSAI is vested with powers of making regulations and giving directives to the Commissioner of Food Safety in all states. Therefore, Commissioners of Food Safety in the states are legally under the control of the FSSAI, though administratively independent. The Commissioner of Food Safety has the powers to prohibit any food product within the state for up to one year, to give his sanction for prosecutions for offences punishable with imprisonment and to appoint the Designated Officer, Food Safety Officer and Food Analyst within the state. Further the Commissioner of Food Safety has the same powers as the Food Safety Officers.

Bangladesh is a unitary country. The *Food Safety Act of 2013* [4] established the food administration system in Bangladesh. Section 5 of the Act introduces the Bangladesh Food Safety Authority (BFSA) which consists of a chairman (who is also the Chief Executive Officer) and four members appointed by the government, thus being politically influenceable. Similar to India, the BFSA can establish branches. The main duties and

functions of the Authority are to regulate and monitor activities related to the manufacture, import, processing, storage, distribution and sale of food through the exercise of appropriate scientific methods so as to ensure access to safe food and to coordinate the activities of all organizations concerned with food safety management. The BFSA may form Technical Committees, consisting of experts in food safety or related subjects, to assist and advise it in conducting its functions as necessary.

Similar to Bangladesh, Sri Lanka is also a unitary country. However, in Sri Lanka~~n,~~ as per the *Food Act of 1980* [5], food authorities are at two levels. The Chief Food Authority (CFA) is at the central level for the entire country (Section 11) and Food Authorities at local council level act in that respective local council area (Section 10). Unlike in India and Bangladesh, Sri Lankan food authorities are individuals rather than cooperative bodies and do not have the power to make food regulations. Regulations are made by the Minister. Further, the Director General of the Health Services is the ex-officio Chief Food Authority. Therefore, not a direct political appointee, thus less politically and industrially influenceable. At local council level, Sri Lanka has several Food Authorities depending on the type of food (Table 2).

Table 2: Food Authorities in Sri Lanka

Authority	Type of food	Designation/body	Administrative area
Food Authority	Alcoholic foods	Commissioner General of Excise	All of Sri Lanka
	Food of which importation is prohibited	Director General of Customs	All of Sri Lanka
	All other foods	Municipal Council (Mayor)	Municipal Council area
		Urban Council (Chairman)	Urban Council area
		Pradeshiya Sabha (Chairman)	Pradeshiya Sabha area

Mayors and chairmen are politicians. In terms of food safety and the law, they are not technically competent. Apart from registering food premises (Section 7), Sri Lankan Food Authorities do not have much control over food premises and authorized officers when compared to the Indian food authorities. Unlike in Sri Lanka, Indian and Bangladesh authorities are corporate bodies/institutions as recommended by the *International Model Food Law* and have more administrative and financial capacity.

In Sri Lanka, public health, including food safety, is primarily implemented through the provincial health system, since the establishment of provincial councils following the 13th amendment to the Sri Lankan Constitution in 1987 [8]. The majority of the Authorized Officers are administered by the Provincial Director of Health Service (PDHS), who serves as the department head of the provincial health department. By keeping an eye on the work of the Authorized Officers, the PDHS office, with its administrative authority, could play a vital role in ensuring food safety. The PDHS is not recognized by the *Food Act*'s present governance system, most likely because the *Food Act* was passed in 1980, before provincial councils were established; however, the Act has failed to incorporate it in its

amendments of 1991 [9] and 2011 [10]. The PDHS post could be recognized as a provincial food authority, similar to the Commissioner of Food Safety in India.

Advisory body

As per Section 6 of the *International Model Food Act* [2], the Food Control Authority is advised, supervised and monitored by a 'Food Control Board'. The Board consists of an Executive Director and other members representing relevant ministries and fields related to food safety. These representatives could be picked by the minister based on their qualifications, experience and expertise. All members are appointed by the minister for a term of three years. Board advises the minister. Minister can give directions to the Board and can dissolve the Board in cases of failure to comply with his directions. Unavailability of ex-officio members makes the Board fully under the influence of the minister. Thus, the independence, efficiency and even accuracy of its advices may depend on the minister's influence. Board is chaired by a member elected by its members. Board shall meet at least four times per year. Board can appoint subcommittees to assist it in the performance of its functions. Further, Minister appoints Scientific Committees to carry out food safety risk assessments.

As per Indian law [3] the Food Safety Standards Authority of India is advised by three advisory bodies (Table 3).

Table 3: Indian advisory bodies

Advisory committee	Constitution
Central Advisory Committee	Representatives from different stakeholders
Scientific Panels	Independent scientific experts
Scientific Committee	Chairpersons of all established Scientific Panels and six independent scientific experts

Chief Executive Officer of the FSSAI is an ex officio member of the Central Advisory Committee, thus ensuring that advice is properly communicated to the authority. Chairperson of the Scientific Committee is a member of Central Advisory Committee which provides the link between these expert panels and the Central Advisory Committee. Various committees at central level enable strong food safety laws and policies; however, there is a lack of committees to monitor the implementation of the law.

The Bangladesh Food Safety Authority (BFSA) is advised and directed by the 'National Food Safety Management Advisory Council' established under Section 3 of the Bangladesh Act [4]. The relevant minister is the president while the cabinet secretary is the vice president. Secretary of this advisory council is the Secretary of the Ministry of Food. All other members are ex-officio (secretaries, chairmen, presidents, mayors and directors) except for the member of the parliament nominated by the speaker. Chaiman of the Bangladesh Food Safety Authority is also a member. Therefore, this National Food

Safety Management Advisory Council is represented by administrative heads of institutions related to food safety, rather than technical experts in food safety. In addition, the chairman is a politician and most of members are political representatives. Thus, this advisory model does not ensure independent and sound technical advice to the BFSA.
The Food Advisory Committee (FAC) is an advisory board in Sri Lanka which is established to advise the Minister of Health who is responsible to enact regulations under the *Food Act* [5,10]. Similar to Bangladesh, this FAC is represented mostly by ex officio who are the heads of institutions relevant to food safety, rather than pure technical experts in food safety. Most of these heads of institutions are either politically appointed or transferred to that position through the routine transfer scheme; therefore, there is no guarantee that they are experts in food safety. However, the presence of ex-officio makes the committee more politically independent. The FAC in Sri Lanka is not a decision making or decision implementing body; therefore, the presence of administrative heads rather than technical experts is questionable. Unlike in India and Bangladesh, this FAC advises the minister but not the authority. The reason is that in Sri Lanka, food regulations are made by the minister, not by the authority; however, in India and Bangladesh, food regulations are made and published by the authorities – FSSAI and BFSA.

Coordination between ministries/departments/institutions

Food safety is a subject crosscutting through a large number of areas such as health, agriculture, fishery, animal production, import and export, custom, commerce, industry, education, excise, sport, consumer protection, etc.... Therefore, though one authority holds the overall responsibility, food safety cannot be achieved without the contribution of other collateral ministries/departments/institutions.

Food Control Authority in the *International Model Food Law* [2], is the key responsible organization for coordination. However, the mechanism for coordination is not stipulated. Food Control Board, which is the key advisory body is represented by different stakeholders in food safety; however, no role or mechanism is stipulated for coordination between stakeholders.

Indian food authority (FSSAI) is the governing body which monitors the implementation of food safety activities in the country [3]. This authority is composed of different stakeholders of food safety, namely agriculture, commerce, consumer affairs, food processing, health, legislative affairs, small scale industries, and consumer organizations. The representatives are not below the rank of a Joint Secretary to the Government of India; therefore, they have the decision-making powers in the respective ministries/departments. Hence, coordination between the stakeholders is automatically established.

To coordinate and ensure the support of all food safety related institutions in Bangladesh, there is a 'Central Food Safety Management Coordination Committee' [4] with representation by all food safety related institutions (Section 15 of the Act). Representatives are at Secretary/Director General or Director level who have decision-making powers in the respective ministries/departments/institutions. Hence,

coordination between the stakeholders is well established. This type of coordination body is necessary as the Bangladesh Food Safety Authority has only five members (including the Chairman) and is not represented by administrative officers of stakeholder ministries/department/institutions, who can take decisions.

Sri Lankan Chief Food Authority is the Director General of Health Services [5], who represents only the health service. Sri Lanka does not have a corporate body represented by different stakeholders. Stakeholder representatives are present in the Food Advisory Committee which has no decision-making powers but plays only an advisory role to the Minister. Therefore, the Sri Lankan Food Act does not provide an effective mechanism to coordinate between ministries/departments/institutions relevant to food safety, which is a major drawback in the food safety governing system.

Law enforcing officers

The *International Model Food Act* [2] states that the minister may from time to time appoint or designate any person with the prescribed qualifications as Authorized Officers to carry out the functions assigned to such officers under the Act (Section 13 (b) [1]. Therefore, qualifications are to be prescribed by the minister. There is no stipulated mechanism to monitor and regulate Authorized Officers. When the Authorized Officers are not strictly supervised, monitored and regulated, this will automatically lead to corruption and inefficiency, especially in South Asian context. Any person aggrieved by an action or decision of an authorized officer or an official analyst may appeal to the Board within the prescribed time period. No provisions are available for authorized officers to take sanction or approval prior to prosecution.

The key law enforcing officer under the *Indian Food Safety Act* [3] is the Food Safety Officer (Section 37). The qualifications for the Food Safety Officer are prescribed by the central government. These Food Safety Officers are appointed by the Commissioner of Food Safety of the state. Provisions are available in the Indian *Food Safety Act* to monitor and regulate these law enforcing officers. Records of all inspections made by Food Safety Officers and action taken by them in the performance of their duties are maintained by the Designated Officer. Designated Officers are empowered to investigate any complaint which may be made in writing against the Food Safety Officer. Food Safety Officers cannot issue Improvement Notices (with such powers given only to Designated Officers) or prosecute ~~for~~ offences punishable with imprisonment without the sanction of the Commissioner of Food Safety. Further, the Food Safety Officer is liable to penalties if he has seized food on unreasonable ground (Section 39). The Commissioner of Food Safety may, from time-to-time, issue guidelines with regard to the exercise of powers by the Food Safety Officer, which shall be binding (Section 38 [10]. The Designated Officer can investigate any complaint which is made in writing against the Food Safety Officer (Section 36). Most importantly, in case of misconduct, the powers of a Food Safety Officer may be revoked for a specified period by the Commissioner of Food Safety, which is a good regulatory mechanism to ensure efficiency and to prevent corruption. Further, the Food Safety Officer cannot prosecute for offences punishable with imprisonment by his own discretion but has to take the sanction from the Commissioner of Food Safety. The

Designated Officer has to provide a recommendation to the Commissioner of Food Safety for sanction to launch prosecutions in case of contraventions punishable with imprisonment (Section 36). Therefore, Indian law has sufficient provisions to control their Authorized Officers. In addition to the Food Safety Officers, law enforcing powers are also given to Designated Officers and Commissioners of Food Safety so that they, too, can prosecute and enforce the powers of Food Safety Officers preventing a monopoly in enforcing the law.

Law enforcing officers under the *Bangladesh Food Safety Act* [4] are called Food Safety Inspectors (Section 51). They are appointed at the central level by the Bangladesh Food Safety Authority; therefore, such officers are officers in the Authority and dedicated solely to implement the food legislation. In addition, the Authority can assign the duties of a Food Safety Inspector to any government officer (with the approval of the Governor) or any officer of the local authority (with the approval of the local authority); in this case, such officers may not be dedicated solely to implement food legislations. Further, there is no stipulated mechanism to supervise, monitor and regulate Authorized Officers, which could lead to corruptions and inefficiency. The Bangladesh Food Safety Act has not provided any provisions for Food Safety Inspectors to obtain approval or sanction prior to prosecution. Further, no provisions are available to receive complains and investigation against Food Safety Inspectors.

Section 13 [1] of the *Food Act, No.26 of 1980* [5,9] of Sri Lanka, states that the Minister may approve any Medical Office of Health, Divisional Health Officer, Veterinary Surgeon, Food & Drugs Inspector, Food Inspector and Public Health Inspector to be an Authorized Officer of one or more Food Authorities. Accordingly, the Minister has approved the said officers except the Divisional Health Officer and Veterinary Surgeon as Authorized Officers under the Gazette No 1097/13 published on 17/09/1999 with effect from 26/11/1988 [11]. The post of Divisional Health Officer does not exist. Among these Authorized Officers, only Food Inspectors are dedicated solely to implement food legislation; however, there are no Food Inspectors appointed yet in the Health Department. Therefore, currently none of the Authorized Officers are dedicated solely to implement food legislation in Sri Lanka, which impedes the implementation of the law and food safety. Similar to Bangladesh, the Sri Lankan *Food Act* has not provided any provisions for Authorized Officers to take approval or sanction prior to prosecution or to receive complaints and investigation against Authorized Officers. Therefore, there is no stipulated mechanism to supervise, monitor and regulate Authorized Officers, which could lead to corruption and inefficiency.

Analysis

International Model Food Law [2] does not provide sufficient provisions on food sampling by Authorized Officers (except for the imported and exported foods). No express powers are given to Authorized Officers for food sampling; however, they may be implied by the power given for 'examination of food'. There are provisions regarding the analysis report which is said to be valid evidence if signed by the director or head of an official laboratory or by an official analyst. There are no provisions regarding appointing analysts or laboratories. However, provisions are given to the minister to make regulations on

procedures to be followed by official analysts and official laboratories; therefore, the concept of an 'official analyst' and an 'official laboratory' exist. There is no provision regarding a reference laboratory. Any person aggrieved by the decision of an official analyst may appeal to the Board within the prescribed time period and if the aggrieved person is not satisfied with the decision of the Board, he or she may, in accordance with the prescribed procedures, appeal to the Minister, whose decision shall be final. Therefore, an extrajudicial appeal procedure is stipulated.

Food Safety Officers in India are given powers to take samples and send for analysis to a Food Analyst under the Section 38 of the *Indian Food Safety Act* [3]. The report of the analyst is not directly sent to the Food Safety Officer, but to the Designated Officer within 14 days from the date of receipt of any sample for analysis. Further, a purchaser other than a Food Safety Officer is empowered, after informing the seller the intention, to send a sample to a Food Analyst on payment of such fees. If the report of the Food Analyst shows that the article of food is not in compliance with the Act or the rules or regulations made thereunder, the purchaser shall be entitled to get refund of the fees paid by him. Food laboratory includes food laboratory or institute established by the Central or a State Government or any other agency and accredited by National Accreditation Board. Further, referral laboratories are identified by the Food Authority (FSSAI). Appeal against the report of Food Analyst shall lie before the Designated Officer who shall, if he so decides, refer the matter to the referral food laboratory.

Bangladesh Food Safety Authority [4] shall appoint such number of Food Analysts as may be necessary to analyse or examine the samples of food or food ingredients (Section 45). Therefore, sampling is limited only to food items. Food Safety Inspectors in Bangladesh are not directly empowered to take samples. Authority or the person authorized by it can take samples and are empowered to collect samples of any article of food or food ingredient (Section 47). Bangladesh *Food Safety Act* also allows any person to send a sample to a Food Analyst on payment of such fees (Section 46). Further, no person is allowed to cause a certificate issued by a Food Analyst or a copy thereof to be exhibited at his business establishment or any other place or to be used for any advertisement. The analyst has to issue a result certificate on the sample with a copy to the Authority, within 7 (seven) working days in general case, and in urgent case, within 3 (three) working days from the date of receipt of the sample. No reference laboratory or extra judicial appeal procedure is given.

The Sri Lankan *Food Act* [5] has given powers to its Authorized Officers to take samples of 'articles' (Section 14) which includes food, anything used or capable of used for the manufacturing, preparation, preservation, packaging, or storing; and any label or advertisement. Samples are examined either by the Government Analyst (Approved Analyst) or by an Additional Approved Analysts approved by the Minister of Health (Section 17). Sri Lankan law recognizes only analysts but not laboratories. Reports from accredited laboratories are not a legal requirement. No reference laboratory is stipulated;

therefore, there is no mechanism for follow up in case of disparity between two laboratory reports.

Summary of the key comparisons

The key findings are summarized in Table 4.

Table 4: Summary of key comparisons

Area	Law	Key findings
Authority	International Model Food Law	Multisectoral. Appointment method and establishing branches not stated. Single authority.
	Indian Food Safety and Standards Act	Multisectoral. Indirect political appointments. Can establish branches. Different type of authorities at different administrative level.
	Bangladesh's Food Safety Act	Multisectoral. Direct political appointments. Can establish branches. One authority only.
	Sri Lankan Food Act	Single person. Routine administrative appointment. No branches. Different type of authorities at different administrative level.
Advisory body	International Model Food Law	Available. Political appointment. Single body.
	Indian Food Safety and Standards Act	Available. Three bodies. No direct political appointments. Represent technical persons.
	Bangladesh's Food Safety Act	Available. Single body. Represent administrative persons.
	Sri Lankan Food Act	Available. Single body. Political; and ex-officio appointments. Represent both administrative and technical persons.
Coordination between ministries /departments/ institutions	International Model Food Law	No coordination mechanism stipulated.
	Indian Food Safety and Standards Act	Mechanism available. Has decision taking powers.
	Bangladesh's Food Safety Act	Mechanism available. Has decision taking powers.
	Sri Lankan Food Act	No mechanism available and no decision taking powers.
Law enforcing officers	International Model Food Law	Dedicated officers available. Control and monitoring mechanism not available.
	Indian Food Safety and Standards Act	Dedicated officers available. Control and control or monitoring mechanism available.
	Bangladesh's Food Safety Act	Both dedicated and non-dedicated officers available. Control and control or monitoring mechanism available.
	Sri Lankan Food Act	Dedicated officers not available. Control and control or monitoring mechanism not available.
Analysis	International Model Food Law	Mechanism of appointing analysts/ laboratories and food sampling procedure not stipulated. Extrajudicial appeal procedure available. No reference laboratory.

	Indian Food Safety and Standards Act	Mechanism of appointing analysts/ laboratories and food sampling procedure stipulated. Extrajudicial appeal procedure and the reference laboratory available.
	Bangladesh's Food Safety Act	Mechanism of appointing analysts mentioned but not laboratories. Food sampling procedure stipulated. No extrajudicial appeal procedure. No reference laboratory.
	Sri Lankan Food Act	Mechanism of appointing analysts mentioned but not laboratories. Food sampling procedure stipulated in a regulation. No extrajudicial appeal procedure. No reference laboratory.

Limitations

This study is limited to a black-letter legal analysis of statutes, regulations, and model laws. It does not empirically assess how food safety laws are implemented in practice, thereby excluding ground-level realities such as enforcement efficiency, compliance behaviour, and institutional capacity.

The research focuses only on India, Bangladesh, and Sri Lanka, which may restrict the generalizability of findings to other jurisdictions. While these countries are regionally comparable, they do not represent the full diversity of food safety governance systems in South Asia.

Differences in legal drafting styles, terminology, and institutional arrangements across the selected countries may affect direct comparability and interpretation of provisions.

Conclusions and recommendations

The *International Model Food Law* provides a good guideline to draft domestic food laws; however, since it is not regional specific, it may not be ideal for the South Asian political, social and industrial context. Political independence, stakeholder coordination and monitoring mechanisms need to be revisited and strengthened. A technically sound and politically independent authority model similar to the Indian one would be the ideal model for South Asian countries. It is further recommended to establish a decision-making stakeholder committee consisting of administrators to implement recommendations made by an advisory stakeholder committee consisting of technical experts. Indian Authorized Officers are strictly controlled and monitored, with a system of revoking powers, investigating complaints, and sanction to prosecute, which could be adopted in Sri Lanka, Bangladesh and International Model Food Law. None of the jurisdictions have an effective monitoring system at implementation level. Unlike in India and Bangladesh, Sri Lanka does not have Authorized Officers dedicated solely for food safety and implementation of law; Sri Lanka needs to consider a category of 'Food Safety Officers' as a new category or as a promotion of an existing category like Public Health

Inspectors. Bangladesh, Sri Lanka as well as the *International Model Food Law* need to revisit their laws to identify accredited and reference laboratories.

Acknowledgements

Authors acknowledge Miss Lihinikadu Gamage Dishani Puimi for her support in finding relevant laws and articles.

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