

ECO LABEL SRI LANKA



Ecolabelling Criteria for Confectionery Products



**National Cleaner Production Centre,
Sri Lanka**



1. Introduction

1.1 The Certification Scheme for Eco Labelling of Products/Services of the National Cleaner Production Centre, Sri Lanka (NCPC-SL) is based on the requirements laid down in the **ISO 14024:2018 Environmental Labels and Declarations - Type 1 environmental labelling – Principles and Procedures**.

1.2 ISO 14024 specifies the requirements for eco-labeling certification. The Eco Labelling criteria /s of NCPC SL satisfy the ISO 14024 requirements as required by the eco-labelling certification schemes. Here are the key requirements fulfilled accordingly;

- **Scope:** The eco-labeling certification scheme covers specific product categories/services with a significant impact on the environment.
- **Product Criteria:** Clear and transparent environmental criteria has been established for products/ services to be eligible for the eco-label. These criteria has been based on scientific evidence and consider the entire product life cycle.
- **Independent Third-Party Verification:** NCPC SL conduct independent third-party verification of compliance with the eco-labeling criteria.
- **Impartiality:** The certification process is impartial and free from any conflicts of interest that could undermine its credibility.
- **Transparency:** The eco-labeling scheme has provided transparent information about the certification process, criteria, and verification procedures.
- **Continuous Improvement:** The scheme encourages continuous improvement in the environmental performance of certified products /services.
- **Stakeholder Involvement:** Stakeholders, including businesses, NGOs, consumers, and government representatives, has been involved in the development and revision of the eco-labeling criteria.
- **Non-Discrimination:** The certification scheme has not discriminated against products or services from different sources based on factors unrelated to environmental performance.
- **Compliance Monitoring:** Regular monitoring and surveillance of certified products or services has been conducted to ensure ongoing compliance with eco-labeling criteria.
- **Public Access to Information:** Information about the eco-labeling scheme, certified products, and their environmental criteria shall be accessible to the public.
- **Environmental Labeling and Advertising:** The use of the eco-label in advertising or labeling has been controlled and subject to the certification scheme's rules.
- **Review and Revision:** The certification scheme should undergo periodic review and revision to ensure its relevance and effectiveness.

1.3 This document outlines specific managerial and technical criteria for the manufacturing, production, and dispatching of confectionery products for sale or export. It also incorporates terminologies and aspects related to sustainability management throughout these processes. The sustainability aspects covered in this document may include environmental impact, energy and water security, socio-economic development, or a combination of these factors.

1.4 The certification of Eco Labelling of Confectionery Products is implemented through a set programme operated over a specified period as agreed upon with relevant parties. The NCPC-SL functions as the scheme owner of this certification scheme. This document includes environmental criteria, food product safety, quality and functional characteristics, and legal requirements related to Confectionery products.



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1.5 This specific product environmental criteria document has been prepared by the Expert Committee on Eco Labelling appointed by the NCPC-SL and authorized for adoption by the Board of Directors of NCPC-SL. The Confectionery products manufacturers who are seeking eco-labeling certification are required to meet the following requirements.

The product and processing conditions shall comply with the requirements given in the below

- I. NCPC-SL guidelines; and
- II. The product and processing shall comply with relevant regulations mentioned in this document and enforced in the country, as applicable; and
- III. The product should conform to the relevant national, regional, and internationally recognized standards

1.6 This document supplements the below guidelines and provides guidance for the certification of Confectionery products for both Assessors and Producers who are preparing for certification. Each criterion mentioned herein is categorized depending on the significance of its impact on the product environmental criterion or product function characteristic being discussed, e.g. energy, water, environment, or socio-development, as follows.

Mandatory requirements (M) – Related to the legal requirements and product safety, functional characteristics

Critical requirements (C) – Significant to product environmental criteria

Non-critical requirements (NC) - Not so significant to product environmental criteria when compared to critical requirements

1.7 This document should also be read in conjunction with the Rules and Procedures of NCPC-SL as applicable to the Eco Labelling Certification scheme.

1.8 This document will be periodically reviewed and updated based on the experience gained and the developments that have taken place in technology and the use of energy, water, material, and the environment. The term '**shall**' is used in this document to indicate those provisions which are mandatory. The term '**must**' is used to indicate the guidance which, although not mandatory, is provided by NCPC-SL as a recognized means of meeting the requirements of the standard. The term '**should**' is used to indicate recommendations for implementation.

1.9 The client should submit the relevant pieces of evidence for conformity verification for the last calendar year.

2. References

In the preparation of this criteria document, the following documents were referred.

1. ISO 14020 – Environmental labels and declarations - General principles
2. ISO 14024 – Environmental labels and declarations- Type 1 environmental labeling– Principles and procedures
3. Guidelines for Providing Product Sustainability Information, UN Environment Programme, 2017
4. Sri Lanka Standard 1551: 2016, Principal Criteria and Indicator for Sustainably Produced Fuelwood
5. Sri Lankan Food Act, No. 26 of 1980, Food (Amendment) Act – 2011
6. ISO 22000: 2018, HACCP, GAP, GMP, Codex Alimentarius
7. Sri Lankan Government Gazettes
8. National Environmental Act



3. Terms and Definitions

For this document, the terms and definitions given in the referred standards and the following shall apply.

- **Conformity:** Fulfillment of a requirement
- **Note:** Conformance and compliance are synonymously used for conformity but deprecated.
- **Codex Alimentarius:** The Codex Alimentarius, or "Food Code" is a collection of standards, guidelines and codes of practice adopted by the Codex Alimentarius Commission. The Commission, also known as CAC, is the central part of the Joint FAO/WHO Food Standards Programme and was established by FAO and WHO to protect consumer health and promote fair practices in food trade.
- **Codex Standards:** Codex standards ensure that food is safe and can be traded. The 188 Codex members have negotiated science based recommendations in all areas related to food safety and quality. Codex food safety texts are a reference in WTO trade disputes.
- **Verification:** Confirmation through the provision of objective evidence that specified requirements have been fulfilled.
- **Organization:** The Applicant organization is hereinafter referred to as an organization.
- **Food Additives:** Any substance not normally consumed as a food by itself and not normally used as a typical ingredient of the food, whether or not it has nutritive value, the intentional addition of which to food for a technological (including organoleptic) purpose in the manufacture, processing, preparation, treatment, packing, packaging, transport or holding of such food results, or may be reasonably expected to result (directly or indirectly), in it or its by-products becoming a component of or otherwise affecting the characteristics of such foods. The term does not include contaminants or substances added to food for maintaining or improving nutritional qualities (CODEX)
- **Food Value Chain:** The full range of farms and firms and their successive coordinated value-adding activities that produce raw agricultural materials and transform them into particular food products that are sold to final consumers and disposed of after use, in a manner that is profitable throughout, has broad-based benefits for society, and does not permanently deplete natural resources (FAO)
- **Bakers' confectionery:** Includes sweet baked goods, especially those that are served for the dessert course. Bakers' confections are sweet foods that feature flour as a main ingredient and are baked. Major categories include cakes, sweet pastries, doughnuts, scones, and cookie.
- **Chocolate Confectionery:** Products made from cocoa materials, potentially combined with milk products, sugars, sweeteners, and permitted additives, obtained through an adequate manufacturing process.
- **Sugar Confectionery:** Any solid or semi solid food complete in itself and suitable for consumption without further preparation or processing, of which the main ingredient is sugar, sweetening matter with or without the addition of edible fat, dairy products, gelatin, edible gums, nuts or preserved fruits and includes sweetened liquorice and chewing gum but does not include chocolate confectionery and cream, ice lollies, table jellies, table jelly preparations, slab marzipan, meringues or pharmaceutical products or sugar

4. Abbreviations

EMS: Environmental Management System

EPL: Environmental Protection License

FVC: Food Value Chain

GAP: Good Agricultural Practices

GMP: Good Manufacturing Practices

HACCP: Hazard Analysis and Critical Control Points

IPM: Integrated Pest Management

MRL: Maximum Residue Levels



Table 1: Eco Label Certification Requirements

| Certification Criteria Requirements | Weighting Factor |
|--|------------------|
| 5. Phase: Selection of raw material | |
| 5.1 Verified Supplier and Quality Assurance Criteria | |
| a) Raw materials/ ingredients/ additives shall be sourced from sustainable sources, preferably from certified suppliers who has followed best practices that prevent deforestation, protect biodiversity, and promote soil health (Such certifications include Eco-label Sri Lanka, Organic, Fair Trade, FSC-certified, Rainforest Alliance, etc.). <i>Conformity Verification:</i> <i>Relevant accredited certificates</i> <i>Records of supplier verification audits</i> <i>Verification audits with supplier (Online)</i> | M |
| b) Raw materials/ ingredients/ additives supplied shall be tracked to verify country of origin, quality control, safety compliance, and rapid contamination response. <i>Conformity Verification:</i> <i>Records of supplier verification audits</i> <i>Verification audits with supplier (Online)</i> <i>Certificate of country of Origin</i> <i>Sanitary & Phyto-Sanitary Certificate</i> | C |
| c) Sourcing should be made with minimum GHG emissions (low-carbon footprint). <i>Conformity Verification:</i> <i>Carbon Footprint Analysis Reports</i> <i>Sustainability Certifications</i> <i>Supplier Sustainability Declarations</i> <i>Energy Usage Reports</i> <i>Third-party Audit Reports</i> <i>Environmental Impact Assessments</i> | NC |
| d) Raw materials/ ingredients/ additives must be free from harmful microorganisms to prevent foodborne illnesses and spoilage. <i>Conformity Verification:</i> <i>Pathogen control measures</i> <i>Handling protocols</i> <i>Accredited Laboratory Test reports</i> <i>Supply verification audit records</i> | C |
| e) Raw materials/ ingredients/ additives shall comply with minimal levels of harmful chemicals, including pesticides, heavy metals, and mycotoxins, to ensure safety in compliance with national and international standards (Sri Lankan Food Act, Sri Lanka Standards Institute (SLS), Codex Alimentarius, and European Union (EU) regulations). | M |



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| <p><i>Conformity Verification:</i> <i>Accredited laboratory Test Reports (laboratory analysis for harmful chemicals)</i> <i>Certificates of Compliance (from suppliers/manufacturers)</i> <i>Quality Assurance Records (internal testing and audits)</i> <i>Regulatory Inspection Reports (from authorities or third-party inspections)</i> <i>Product Safety Certifications (from relevant certification bodies)</i></p> | |
| <p>f) All raw materials/ ingredients/ additives shall be compatible to maintain product integrity and quality.</p> <p><i>Conformity Verification:</i> <i>Supplier verification audit records (Ingredient compatibility Accredited test reports, Formulation, Supplier ingredient specification sheets must be verified)</i></p> | M |
| <p>g) Permissible radiation limits shall not be exceeded for irradiated raw materials/ ingredients/ additives. They shall be labeled to indicate irradiation treatment in compliance with Sri Lankan and international standards (Sri Lanka: Food (Irradiation) Regulations No. 01 of 2013; International: Codex Alimentarius - Guidelines for the Use of Irradiation in the Processing of Food).</p> <p><i>Conformity Verification:</i> <i>Radiation Testing Reports</i> <i>Certification of Compliance</i> <i>Inspection Reports</i> <i>Supplier Declaration</i> <i>Label verification</i></p> | M |
| 6. Phase: Raw Material Receiving | |
| 6.1 Transportation | |
| <p>a) Raw materials/ ingredients/ additives shall be transported in sealed, clean, well maintained containers. Refrigerated vehicles shall be used for temperature-sensitive goods to maintain quality and prevent contamination. This shall help prevent ingredient wastage while adhering to Food (Hygiene) Regulations 2011.</p> <p><i>Conformity Verification:</i> <i>Audits – Onsite/ Online</i> <i>Transportation documentation and temperature maintaining logs</i> <i>Records of the food safety audits</i></p> | M |
| <p>b) Proper documentation, batch tracking, and segregation shall be implemented to prevent contamination and maintain traceability.</p> <p><i>Conformity Verification:</i> <i>Batch tracking reports for traceability</i> <i>Segregation protocols implemented to avoid cross-contamination</i> <i>Import documentation comply with Sri Lanka's food safety regulations</i></p> | M |
| <p>c) All imported raw materials/ ingredients/ additives shall comply with the Food (Labelling and Advertising) Regulations 2022 and Food (Shelf Life for Imported Food Items) Regulations 2014, along with any product-specific regulations, Food Adoption of standards regulations, and all other applicable regulations under the Food Act No. 26 of 1980.</p> | M |



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| <i>Conformity Verification:</i> <i>Certificate of Analysis (COA) (purity, composition, and safety of additives and ingredients.)</i> <i>Import permits and customs documentation</i> <i>Supplier verification audit records</i> <i>Accredited Analytical Certificates</i> <i>Certificate of country of Origin and Sanitary & Phyto-Sanitary Certificates</i> <i>Health Certificates</i> <i>Food safety audit records</i> | |
| d) Raw materials/ ingredients/ additives must be stored in facilities that use proper storage conditions such include Controlled Atmosphere Packaging (CAP) or Modified Atmosphere Packaging (MAP) to extend shelf life and preserve quality. <i>Conformity Verification:</i> <i>Records of storage conditions</i> <i>Organization temperature and humidity control records</i> <i>CAP/ MAP compliance testing documents</i> <i>Onsite audits</i> | M |
| 7. Phase: Confectionery Processing/ Manufacturing | |
| 7.1 Legal Requirement | |
| a) The Environmental Protection License (EPL) shall be obtained and implemented all its requirements. <i>Conformity Verification</i> <i>Valid Environmental Protection License</i> | M |
| 7.2 General Requirement | |
| b) Documented Environmental Management Roadmap must be developed to address the potential environmental problems of the organization. <i>Conformity Verification</i> <i>Environment management roadmap of the organization</i> | C |
| c) Environmental Management System/s, Food Safety Management Systems should be implemented in the organization. <i>Conformity Verification</i> <i>Accredited certificates (ISO 14001 EMS, ISO 22000 FSMS/ HACCP/ GMP/ BRC certificate etc.)</i> | NC |
| 7.3 Eco friendly manufacturing facility | |
| a) Compliance with the Food (Registration of Premises) Regulations - 2019 under the Food Act shall be demonstrated by food establishments. Registration shall be valid and up to date, ensuring adherence to hygiene, safety, and environmental management standards. <i>Conformity Verification</i> <i>Valid Registration Certificate</i> <i>Inspection Reports</i> | M |



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| <p>b) Environmentally non-toxic materials must be used within the production premises.</p> <p><i>Conformity Verification</i> <i>Onsite audits</i> <i>Use of eco-friendly materials</i></p> | C |
| <p>c) Recyclable materials should be used where applicable.</p> <p><i>Conformity Verification</i> <i>Onsite audits</i></p> | NC |
| <p>d) Green spaces should be provided, and land disturbance should be minimized to protect local ecosystems and reduce heat islands.</p> <p><i>Conformity Verification</i> <i>Onsite audits</i> <i>Green spaces & land use</i></p> | NC |
| <p>e) An efficient layout must be available that optimizes space utilization for various stages of processing, including receiving, storage, processing, packaging, and dispatch.</p> <p><i>Conformity Verification</i> <i>Onsite audits</i> <i>Efficient processing layout</i></p> | C |
| <p>f) Easy-to-clean surfaces, proper drainage systems, and designated areas for waste management must be provided.</p> <p><i>Conformity Verification</i> <i>Onsite audits</i> <i>Cleaning and sanitation records</i></p> | C |
| <p>g) Temperature and humidity control systems must be available to ensure the quality and safety of products during processing and storage.</p> <p><i>Conformity Verification</i> <i>Onsite audits</i> <i>Temperature and humidity monitoring records</i></p> | C |
| <p>h) The design must ensure the safety and accessibility of workers, including proper lighting (Lux level), ventilation, emergency exits, and accessibility features for individuals with disabilities.</p> <p><i>Conformity Verification</i> <i>Onsite audits</i> <i>Safety protocol records</i></p> | C |



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| <p>i) All components of machines and equipment that directly contact with food ingredients shall be made of food-grade, non-toxic materials to ensure product safety.</p> <p><i>Conformity Verification</i> <i>Onsite audits</i> <i>Safety protocol records</i> <i>Supplier verification audit records</i></p> | M |
| 7.4 Good Manufacturing Processes (GMP) | |
| <p>a) Proper sanitation must be implemented to prevent contamination throughout the production process.</p> <p><i>Conformity Verification</i> <i>Inspection of facilities, equipment, machinery</i> <i>Review of hygiene records to ensure compliance with sanitation standards.</i></p> | C |
| <p>b) Proper hygienic practices must be established and implemented throughout the production process.</p> <p><i>Conformity Verification</i> <i>Inspection of employee hygiene practices</i> <i>Employee medical records</i></p> | C |
| <p>c) Standardized procedures must be implemented for all aspects of production to ensure consistent product quality.</p> <p><i>Conformity Verification</i> <i>Verify that standardized procedures are followed by reviewing production records and conducting Onsite audits</i></p> | C |
| <p>d) Proper storage practices must be used to maintain the quality and safety of the products.</p> <p><i>Conformity Verification</i> <i>Verify that storage practices are followed by inspecting storage facilities and reviewing records of storage conditions.</i></p> | C |
| <p>e) Traceability of confectionery products from production to distribution must be ensured to maintain product integrity and accountability.</p> <p><i>Conformity Verification</i> <i>Records of product origin, processing steps, and distribution channel</i> <i>Onsite audit reports</i></p> | C |
| <p>f) Quality and safety must be regularly reviewed and improved.</p> <p><i>Conformity Verification</i> <i>Onsite audits</i> <i>Food safety and/ quality audit reports</i> <i>Corrective Action Records</i></p> | C |



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| 7.5 Water Resource Consumption and Conservation | |
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| <p>a) A detailed and up-to-date water supply line diagram must be maintained to ensure efficient water management, identify potential leaks, and support conservation efforts.</p> <p><i>Conformity Verification</i> <i>Approved water supply line diagram.</i> <i>Engineering and plumbing schematics.</i></p> | C |
| <p>b) Infrastructure must be maintained to quantify the water usage for the process, and domestic purposes in the factory across all water sources.</p> <p><i>Conformity verification</i> <i>Water supply metering and/or submetering facilities established.</i> <i>Water consumption records are maintained on a daily/monthly basis.</i></p> | C |
| <p>c) Water usage for all industrial processes and other processes must be measured and monitored.</p> <p><i>Conformity Verification</i> <i>Onsite audits.</i> <i>Submeter readings and log records.</i> <i>Process-wise water usage reports.</i></p> | C |
| <p>d) Company benchmark/baseline for water consumption should be established (Eg: Water consumption of the previous year) and monitor on a continuous basis (Eg: specific water consumption in m³/ liters (m³/Kg, m³/T, m³/ PCs) of product manufactured or per employee water consumption.</p> <p><i>Conformity verification</i> <i>Details of annual production, annual water consumption & specific water consumption for at least 2 years.</i> <i>Details of company benchmarks including comparisons with previous two years or national and international benchmarks.</i></p> | NC |
| <p>e) Significant water uses and reduction measures must be identified.</p> <p><i>Conformity Verification</i> <i>Documented information on significant water uses.</i></p> | C |
| <p>f) Targets must be set to reduce the water consumption and to improve water efficiency.</p> <p><i>Conformity Verification</i> <i>Records on target set and their achievement.</i></p> | C |
| <p>g) An implementation plan/ programmes for water efficiency improvements and to reduce water consumption must be developed and executed.</p> <p><i>Conformity Verification</i> <i>Records on developed action plans and programmes.</i></p> | C |



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| <p>h) <i>Progress of the plan/ programmes must be monitored and analyzed to identify trends, anomalies, and opportunities for water conservation.</i></p> <p><i>Conformity Verification</i> <i>Daily and monthly records of water consumption .</i> <i>Records and reports on areas of identified trends, anomalies, and opportunities for water conservation .</i></p> | C |
| <p>i) Water conservation techniques and technologies must be implemented, so that water efficiency is maintained (Including such Low-Flow Fixtures, Automated Water Monitoring Systems).</p> <p><i>Conformity Verification</i> <i>Onsite audits regarding the implementation of Water conservation techniques and technologies.</i> <i>Records on water consumption,</i> <i>Records on water efficiency measures, and water saving records</i> <i>Process optimization records</i></p> | C |
| <p>j) A portion of the total annual water consumption should be fulfilled through harvested rainwater from roof and non-roof surfaces.</p> <p><i>Conformity Verification:</i> <i>Onsite audit</i> <i>Records on operational rainwater harvesting systems</i> <i>Monthly/annual quantitative data on rainwater collection</i></p> | NC |
| <p>k) Organizational/product water footprint should be calculated, recorded, and maintained with ISO 14046:2021.</p> <p><i>Conformity Verification</i> <i>The transparent and verifiable calculation method is available.</i></p> | NC |
| 7.6 Energy Resource Consumption and Conservation | |
| <p>a) Infrastructure must be maintained to quantify the energy usage for industrial processes and other purposes in the organization.</p> <p><i>Conformity Verification:</i> <i>Electricity sub-metering facilities established in the organization .</i> <i>Electricity/Fuel consumption records are maintained on a daily/monthly basis.</i></p> | C |
| <p>b) Energy consumption data records must be maintained systematically to monitor usage, identify inefficiencies, and improve energy conservation efforts.</p> <p><i>Conformity Verification</i> <i>Energy consumption logs and meter readings.</i> <i>Monthly and annual energy usage reports.</i></p> | C |
| <p>c) Effective Energy Management System (EnMS) or policies, procedures, and energy management programmes must be implemented by the organization (ISO 50001).</p> | C |



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| <i>Conformity Verification</i> <i>Submission of an accredited Energy Management System (EnMS) certificate or a certification demonstrating compliance</i> <i>Records on Energy management Policy, procedures, and energy management programmes are maintained</i> | |
| d) Appropriate measures (Eg: Variable Frequency Drives (VFDs), waste heat recovery applications, etc) must be implemented to improve energy efficiency in the organization <i>Conformity Verification</i> <i>Onsite audits relevant to the energy efficiency measures implemented</i> <i>Records on energy savings done through such implementation</i> | C |
| e) Nonrenewable energy sources should be substituted with renewable energy renewable energy should be used in supply of energy to the organization (such include biomass, solar power, waste to energy) . <i>Conformity Verification</i> <i>The energy requirement is supplied by the Biomass boiler</i> <i>Electricity Generation from Solar power systems, etc</i> | NC |
| f) Energy consumption data must be regularly monitored and analyzed to identify trends, anomalies, and opportunities for energy conservation. Eg: Electrical energy consumption per unit of production output (kWh / Piece, kWh / kg, kWh / T, kWh / MT). <i>Conformity verification</i> <i>Daily and monthly records of electricity and fuel consumption</i> <i>Records and reports on areas of identified trends, anomalies, and opportunities for energy conservation</i> | C |
| 7.7 Solid Waste Management | |
| a) Effective waste management policies and programmes must be implemented. <i>Conformity verification</i> <i>The records on waste management are maintained</i> <i>Onsite audits on the implementation of the waste management programmes/ plan</i> | C |
| b) Wastes shall be segregated and quantified at source into different streams for efficient disposal and recycling. <i>Conformity Verification:</i> <i>Onsite audits to verify waste segregation practices.</i> <i>Records on quantified waste</i> <i>Review of waste management records and logs.</i> | M |
| c) Procedures must be developed for reworking/ discarding products that do not meet safety and quality standards. <i>Conformity Verification:</i> <i>Assessment of QMS documentation related to rework and discard procedures.</i> <i>Observation of rework processes and discard practices during onsite audits</i> | C |



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| d) Wastes must be disposed of in an environmentally friendly manner at designated premises, separate from food manufacturing, in compliance with National Environmental (Municipal Solid Waste) Regulations, No. 1 of 2009, and the National Environmental (Protection & Quality) Regulations No 01 of 2008. <i>Conformity Verification</i> <i>Onsite audits</i> <i>Agreements with waste collectors, recyclers</i> <i>Waste disposal records and logs</i> <i>Audit reports</i> <i>Compliance with waste management regulations</i> | C |
| 7.8 Wastewater Management | |
| a) Wastewater shall not be directed to the water bodies and lands causing health and environmental problems. <i>Conformity Verification:</i> <i>On site audits for direct discharge.</i> <i>Review of drainage design and discharge paths.</i> | M |
| b) The best practices (such as Seepage/soil soak pit system) for used water discharge must be implemented. <i>Conformity Verification</i> <i>Onsite audits</i> | C |
| c) A wastewater treatment system should be installed to treat wastewater. <i>Conformity Verification:</i> <i>Onsite audits</i> | NC |
| d) Treated water should be reused for cleaning, irrigation, and cooling, ensuring no contamination of food production while monitoring reuse efficiency <i>Conformity Verification:</i> <i>Review of wastewater recycling plans and monitoring logs.</i> <i>Onsite audits of wastewater reuse applications.</i> | NC |
| e) Critical parameters of the treated wastewater shall be monitored and tested at predefined intervals. <i>Conformity Verification:</i> <i>Periodic review of monitoring reports and compliance documentation.</i> <i>Inspection of water quality testing facilities and monitoring systems.</i> | C |
| 7.9 Air Pollution Management | |
| a) Measures should be taken at the design stage to minimize fugitive releases of gaseous substances by specifying high-quality equipment and materials that prevent leakage. Use high-quality, corrosion-resistant materials to reduce gas leaks at the design stage. | NC |



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| <i>Conformity Verification:</i> <i>Equipment design details (manufacturer specifications).</i> <i>Material inspection for corrosion resistance.</i> | |
| 7.10 GHG Emission Management | |
| a) Organizational GHG emissions /product carbon footprint should be calculated, recorded, and maintained. (ISO 14064-1, ISO 14067) <i>Conformity Verification</i> <i>A transparent and verifiable calculation method is available.</i> | NC |
| 8. Phase: Sustainable Packaging and Labelling | |
| 8.1 Packing Requirements | |
| a) Packaging materials should be biodegradable or recyclable, where possible. Reduction of plastic usage and encouragement of sustainable alternatives such as paper-based or compostable materials. (Limit: At least 50% of packaging material should be recyclable or biodegradable.) <i>Conformity Verification:</i> <i>Records of packaging material usage</i> | NC |
| b) Primary Packaging shall be made from non-toxic, food-grade materials that do not alter the product's taste, smell, or composition. <i>Conformity Verification:</i> <i>Records of packaging material usage</i> | M |
| c) Unnecessary (over packaging) must be avoided. <i>Conformity Verification</i> <i>Records of quantities of packaging materials used</i> | C |
| d) Environment-related information (e.g., recycled content, disposal methods) must be provided on packaging. This includes labeling plastic identification numbers (resin codes) to aid recycling and ensuring compliance with Sri Lankan environmental regulations on waste management, plastic reduction, and the use of recyclable or biodegradable materials. <i>Conformity Verification</i> <i>Plastic Identification Number Labeling (resin codes)</i> <i>Recycled Material Content Documentation</i> <i>Disposal Methods Information (packaging labels or brochures)</i> <i>Compliance with Sri Lankan Environmental Regulations</i> <i>Inspection Reports (environmental audits)</i> | C |
| e) Clear messages must be mentioned encouraging the buyers to send back the packaging material to the company for reusing or recycling purposes. <i>Conformity Verification</i> <i>Evidence of packaging indicating messages encouraging buyers to resend packing materials.</i> <i>Records on packaging material volumes received back</i> | C |



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| <i>Agreements with waste collectors and recyclers</i> | |
| 8.2 Labelling Requirements | |
| <p>a) All labels shall comply with the Food (Labelling and Advertising) Regulation – 2022, and as well as any other regulations enacted under the Food Act No. 26 of 1980 that may impact food labelling.</p> <p><i>Conformity Verification:</i> <i>Label verification</i> <i>Regulatory Approval Documents</i> <i>Ingredient and Nutritional Information Records</i> <i>Advertising Materials</i> <i>Inspection and Audit Reports</i> <i>Corrective Action Records</i></p> | M |
| <p>b) Sugar, Salt, and Fat Content Labeling</p> <p>A traffic light labeling system shall be used to inform consumers about the sugar, salt, and fat content in packaged foods, governed by the Food (Colour Coding for Sugar, Salt and Fat) Regulations - 2019.</p> <ul style="list-style-type: none">• Sugar Content: Red: More than 22g per 100g, Amber: 8g to 22g per 100g, Green: Less than 8g per 100g• Salt Content: Red: More than 1.25g per 100g, Amber: 0.25g to 1.25g per 100g, Green: Less than 0.25g per 100g• Fat Content: Red: More than 17.5g per 100g, Amber: 3g to 17.5g per 100g, Green: Less than 3g per 100g <p><i>Conformity Verification:</i> <i>Label verification</i> <i>Regulatory approval or certification documents</i> <i>Laboratory test reports verifying sugar, salt, and fat content</i> <i>Inspection and audit reports from regulatory authorities</i> <i>Compliance declarations from manufacturers</i> <i>Corrective action records for non-compliance cases</i></p> | M |
| 9. Phase: Quality Control and Testing | |
| 9.1 General Requirements | |
| <p>a) A well-established Quality Management System (QMS) must be in place, ensuring the implementation of policies, procedures, quality planning, quality control, quality assurance, and continuous improvement initiatives within the organization.</p> <p><i>Conformity Verification</i> <i>Accredited ISO 9001 QMS certificate</i> <i>Documents of quality control and quality assurance (Such as quality objectives, policies, procedures, quality planning)</i></p> | C |



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| b) Microbial limits of the products must be comply with the limits set by SLS, CODEX, and FAO, ensuring pathogens are below permissible levels and yeast and mold are controlled. <i>Conformity Verification:</i> <i>Microbial analysis reports</i> <i>Compliance with food safety standards.</i> | C |
| c) Microbial testing must be conducted regularly using standard methods, with samples collected from raw materials, surfaces, and finished products, following ISO 4833-1:2013, ISO 21527, and ISO 6579. <i>Conformity Verification:</i> <i>Accredited Laboratory test reports</i> <i>Sample collection records.</i> | C |
| d) Food contact surfaces must be swabbed and tested regularly for microbial contamination detection. <i>Conformity Verification:</i> <i>Sanitation logs, hygiene audit reports.</i> | C |
| e) Water used in production shall be potable, meeting WHO and SLS 614 standards. <i>Conformity Verification:</i> <i>Water quality reports</i> | M |
| f) Non-compliant products must be identified, isolated, and discarded or reworked, with root cause analysis conducted, and corrective actions documented and reported. <i>Conformity Verification:</i> <i>Corrective action reports</i> <i>Root cause analysis records.</i> | C |
| 9.2 Process Quality Requirements | |
| a) Ingredients/ additives must be inspected and stored under prescribed conditions in order to prevent deterioration and spoilage <i>Conformity Verification</i> <i>Supplier validation and food safety management.</i> <i>Specifications for food-grade ingredients</i> | C |
| b) Ingredients must be weighed, measured, and mixed for uniform texture. <i>Conformity Verification</i> <i>Critical control points for microbiological safety.</i> <i>Standardized process for accurate ingredient proportion</i> | C |
| c) Food additives shall comply with the criteria set out in the Food (Additives - General) Regulations 2019, which govern the use, safety, and labeling of food additives in Sri Lanka. | M |



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| <i>Conformity Verification:</i> <i>List of Approved Additives</i> <i>Safety Certificate</i> <i>Additive Usage Records</i> <i>Label verification</i> <i>Supplier Certification</i> <i>Inspection Reports</i> <i>Corrective Action Records</i> | |
| d) The moisture content shall be maintained at optimal levels to ensure product freshness and extended shelf life (SLS 1266) <i>Conformity Verification:</i> <i>Accredited Laboratory testing reports</i> <i>Shelf-life studies and stability testing records</i> <i>Supplier certifications</i> | M |
| e) Oven temperatures and baking times must be controlled to ensure quality, while gradual cooling prevents cracks and sogginess. Refrigeration must be used for temperature-sensitive products. <i>Conformity Verification</i> <i>Temperature monitoring to prevent under/overbaking.</i> <i>Hygienic cooling storage to maintain product integrity.</i> <i>Moisture control to prevent sogginess.</i> | C |
| f) Sampling, sensory tests, and lab testing must be performed to ensure quality consistency. All production steps shall be documented for traceability. <i>Conformity Verification</i> <i>Laboratory testing accreditation for food analysis.</i> <i>Quality parameters for bakery, sugar, chocolate confectionery products.</i> | C |
| g) Consumer complaints and feedback must be analyzed for process improvements. Regular audits help refine manufacturing techniques (ISO 9001, HACCP & FAO). <i>Conformity Verification:</i> <i>Quality management system records -handling of customer complains.</i> <i>Systematic review of food safety measures.</i> | C |
| h) Forward and Backward traceability must be maintained to trace the finished product back to the invoice. <i>Conformity Verification:</i> <i>Traceability records indicating products back to the invoice</i> | C |
| i) For confectionery products, biscuit waste should be reduced by at least 5% and packaging waste should be maintained at less than 5% of total production to ensure minimal environmental impact and efficient resource utilization. | NC |



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| <p><i>Conformity Verification:</i> <i>Records of waste reduction initiatives and targets</i> <i>Waste audit and production reports</i> <i>Packaging waste statistics and monitoring reports</i></p> | |
| <p>j) All packaged confectionery products must be 100% sealed to ensure product quality, hygiene, and prevent contamination during transportation and storage.</p> <p><i>Conformity Verification:</i> <i>Inspection reports of packaging integrity</i> <i>Quality control logs confirming seal checks</i> <i>Packaging material records</i></p> | C |
| 10. Phase: Distribution | |
| 10.1 Local Transportation | |
| <p>a) Efficient transport modes/ route optimization techniques should be used in incoming and outgoing transportation</p> <p><i>Conformity verification</i> <i>The transport management plan/ Product distribution plan</i></p> | NC |
| <p>b) All materials and products must be transported under the conditions specified on their labels. The transport process should ensure that there is no risk to the product's quality, safety, or efficacy.</p> <p><i>Conformity verification</i> <i>Verify that transport conditions (e.g., temperature, humidity, handling precautions) align with the product labeling requirements.</i></p> | C |
| <p>c) Distribution records must be detailed enough to allow product traceability and recall if required. The original certificate of analysis from the manufacturer should be provided to the customer.</p> <p><i>Conformity verification</i> <i>Records of storage conditions, and transport details</i></p> | C |
| 11. Phase: Occupational Health and Safety | |
| <p>a) There shall be not any public complain noise/ bad odour/ discharges/ emissions etc.</p> <p><i>Conformity Verification:</i> <i>Public complaint records</i> <i>Environmental monitoring reports</i></p> | M |
| <p>b) Indoor air quality: Emissions to air shall not be exceeded the stipulated limits set by the Central Environmental Authority (CEA) or relevant regulatory bodies to ensure a safe factory atmosphere.</p> <p><i>Conformity Verification:</i> <i>Air quality test reports by an accredited laboratory/organization</i> <i>Onsite verification</i></p> | M |



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| <p>c) Effective dust and airborne particle control measures shall be implemented to minimize contamination and ensure food safety.</p> <p><i>Conformity Verification:</i> <i>Inspection of the facility to verify the implementation of air filtration, vacuum systems, and enclosed processes</i> <i>A dust management plan outlining control measures, including filtration systems, enclosed processing areas, and regular cleaning schedules</i></p> | M |
| <p>d) Noise levels shall be below the threshold limits set by national or international noise regulations, ensuring a safe working environment for employees.</p> <p><i>Conformity Verification:</i> <i>A noise management plan detailing the use of noise-reducing equipment, soundproof barriers, and restricted operating hours for noisy machinery</i> <i>Noise level monitoring reports from accredited third-party measurements, ensuring compliance with standards such as OSHA or ISO 1996-1</i> <i>On-site verification to confirm the availability of hearing protection devices and designated quiet zones for workers exposed to high noise levels</i></p> | M |
| <p>e) An Occupational Health and Safety management system such as ISO 45001:2018 or any other relevant safety standards must be implemented. If not safety audits must be conducted in predetermined intervals.</p> <p><i>Conformity Verification:</i> <i>Valid certification of ISO 45001:2018 or any other relevant standard</i></p> | C |
| <p>f) A fire safety management plan must be implemented.</p> <p><i>Conformity Verification</i> <i>An evacuation plan and the fire extinguishers, fire alarm, fire hydrant</i></p> | C |
| <p>g) All the employees in organization must be provided with appropriate Personal Protective Equipment (PPE) to minimize exposure to workplace hazards, including chemical, biological, and physical risks</p> <p><i>Conformity Verification</i> <i>Onsite audits</i></p> | C |
| 12. Ethical & Social Responsibility Compliance | |
| 12.1 Ethical Business Practices | |
| <p>a) Throughout the food value chain, fair labor practices shall be ensured, including compliance with national labor laws, providing decent/ fair wages, and protecting workers' rights. This includes non-discrimination, freedom of association, and the prohibition of forced or child labor.</p> <p><i>Conformity Verification:</i> <i>Contracts or employment agreements demonstrating compliance with national labor laws.</i> <i>Records of wage payments, ensuring compliance with minimum wage regulations.</i></p> | M |



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| <p><i>Documentation of non-discrimination policies and procedures.</i></p> <p><i>Records of grievances</i></p> <p><i>Interviews</i></p> <p><i>Employee feedback survey results</i></p> | |
| <p>b) Throughout the food value chain, gender equality must be promoted by providing equal employment opportunities and ensuring that women are treated fairly in terms of wages, training, and advancement opportunities.</p> <p><i>Conformity Verification:</i></p> <p><i>Employment records demonstrating gender diversity in hiring and promotion.</i></p> <p><i>Documentation of gender equality policies and procedures.</i></p> <p><i>Reports on training and development opportunities provided to female workers.</i></p> <p><i>Records on wage equality between male and female employees.</i></p> | C |
| <p>c) Throughout the food value chain, support for community development and contribution to social causes should be ensured through donations, volunteering, or other means of support. Ethical conduct should be promoted beyond the company to foster positive social impacts.</p> <p><i>Conformity Verification</i></p> <p><i>Annual reports highlighting the company's involvement in community development or charity</i></p> | NC |
| <p>d) Confectionery products should be reformulated with less sugar, added fiber, or natural sweeteners to lower calorie content.</p> <p><i>Conformity Verification:</i></p> <p><i>Ingredient labeling</i></p> <p><i>Certification of health claims</i></p> | NC |
| 13. Phase: Planning and Management | |
| 13.1 General | |
| <p>a) Strong leadership must be established to ensure effective decision-making and direction in production processes.</p> <p><i>Conformity Verification</i></p> <p><i>Assessment of leadership structure and responsibilities.</i></p> | C |
| <p>b) A culture of continuous improvement should be maintained.</p> <p><i>Conformity Verification</i></p> <p><i>Review of management policies and decision-making records</i></p> | NC |
| <p>c) Management must be responsible for setting objectives, monitoring performance, and ensuring compliance with standards.</p> <p><i>Conformity Verification</i></p> <p><i>Review of management policies and decision-making records</i></p> <p><i>Employee feedback on leadership effectiveness</i></p> | C |
| <p>d) Regular training must be provided to all employees on the following areas;</p> | C |



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| <ul style="list-style-type: none">• Food safety, hygiene practices, and sanitation to ensure a safe and clean environment for food processing• Reduction of workplace injuries and enhance safety standards• The correct use, maintenance, and disposal of PPE to ensure protection from workplace hazards• Allergen management, contamination risks, and prevention techniques to minimize cross-contact of allergens in food products• The environmental impact of processing, focusing on sustainable practices like waste reduction, water conservation, and eco-friendly disposal methods <p><i>Conformity Verification</i> <i>Training agenda</i> <i>Attendance logs</i> <i>Records of feedback evaluation</i> <i>Documented training materials</i></p> | |
| 13.2 Conducting Risk Assessment | |
| <p>a) Risks related to food safety, environmental impact, and operational efficiency must be identified, assessed, and documented.</p> <p><i>Conformity Verification</i> <i>Hazards and risks identification records</i> <i>Risk assessment records</i> <i>Audit records</i> <i>Corrective and preventive action plans</i> <i>Incident logs</i></p> | C |
| <p>b) Mitigation plans must be developed and implemented based on risk assessments, including safety protocols, emergency response plans, and waste management strategies.</p> <p><i>Conformity Verification</i> <i>Mitigation plan documentation, emergency response drills, and follow-up on risk reduction actions.</i></p> | C |



Table 2: Optional Requirements

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| 01. Export Criteria | |
| a) A Health Certificate shall be obtained from the relevant food safety authority to ensure confectionery products meet international standards for hygiene, safety, and ingredient compliance. <i>Conformity Verification:</i> <i>Review of certificates</i> | M |
| b) Packaging materials shall comply with the destination country's regulations to prevent contamination, maintain product integrity, and ensure proper labeling requirements are met. <i>Conformity Verification:</i> <i>Records of export products and packaging compliance</i> | M |
| c) Testing parameters must be aligned with the specific requirements of the importing country, as regulations on ingredients, additives, and contaminants may vary. <i>Conformity Verification:</i> <i>Documentation of testing parameters requested by the importing country maintained</i> | C |
| d) The exporting company shall be registered with the appropriate food regulatory authority (e.g., Food Control Administration Unit - FCAU) and the required health certificates shall be obtained batch wise or consignment wise. <i>Conformity Verification:</i> <i>Records of FCAU registration or equivalent regulatory approval</i> <i>Relevant health certificates</i> | M |
| 02. Specific Requirements Confectionary Food for Children | |
| a) Baby confectionery products shall be free from detectable pesticide residues (0.01 mg/kg), in accordance with National and International regulations. The use of highly toxic pesticides in raw material production shall be strictly prohibited. <i>Conformity Verification:</i> <i>Pesticide residue test reports</i> <i>Supplier verification audits</i> | M |
| b) Packaging shall be designed to prevent the migration of harmful substances into the product, in compliance with Food (Packaging Materials and Articles) Regulation 2010. The use of bisphenol A (BPA) and phthalates in baby food packaging shall be strictly prohibited. <i>Conformity Verification:</i> <i>Packaging material compliance certificates</i> <i>Supplier verification audits</i> | M |
| c) Labels shall be specified with the appropriate age for consumption, following FAO/WHO guidelines. | M |



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| <p><i>Conformity Verification:</i> <i>Label verification</i></p> | |
| <p>d) Clear instructions for preparation and usage must be provided.</p> <p><i>Conformity Verification:</i> <i>Label verification</i></p> | M |
| <p>e) All ingredients shall be clean, safe, and of high quality, in compliance with Codex CXS 73-1981. Ionizing radiation treatment shall not be permitted.</p> <p><i>Conformity Verification:</i> <i>Supplier certifications</i> <i>Ingredient safety reports</i> <i>Production process audit records</i></p> | M |
| <p>f) Baby confectionery products shall be designed to match infants' evolving chewing abilities. Labels shall clearly indicate the recommended age range for consumption, as per the national regulations.</p> <p><i>Conformity Verification:</i> <i>Product formulation records</i> <i>Sensory testing reports</i> <i>Label verification</i></p> | M |
| 03. Specific Requirements Confectionery Food for Patients | |
| <p>a) Confectionery products for patients shall be following National Regulations, with controlled levels of sugar, sodium, and unhealthy fats.</p> <p><i>Conformity Verification:</i> <i>Nutritional analysis reports</i> <i>Ingredient formulation records</i></p> | M |
| <p>b) Packaging must be BPA-free and phthalate-free, following EU regulations, with clear labels on storage, expiry, and dietary suitability.</p> <p><i>Conformity Verification:</i> <i>Packaging compliance certificates</i> <i>Label verification</i></p> | M |
| <p>a) All medical-purpose confectionery shall be adhered to the regulations of National Medicines Regulatory Authority (NMRA).</p> <p><i>Conformity Verification:</i> <i>Compliance with NMRA regulations</i> <i>Approval from healthcare authorities</i> <i>Clinical trial records</i></p> | M |