FDA Clarifies the Rules on Supplementary Labels for Imported Food Products

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Author: Kaung Htet Zaw | Shwe Yee Thein

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KEY TAKEAWAY

In Myanmar, businesses importing prepackaged food products are required to comply with applicable labelling requirements under the National Food Law, 1997 ("NFL") and the Consumer Protection Law, 2019 ("CPL"), together with Directive No. 8/2022 and Directive No. 5/2026 issued by the Food and Drug Administration ("FDA") of the Ministry of Health ("MOH"). However, following the restriction on the use of stickers for supplementary labels introduced by Directive No. 5/2026 on 12 March 2026, businesses faced practical uncertainties regarding the application of the restriction and whether any exceptions remained available. Accordingly, FDA issued Directive No. 7/2026 to clarify the rationale for the restriction and the circumstances in which it does not apply. For businesses importing prepackaged foods into Myanmar, the focus should now be on ensuring that supplementary labels do not obscure mandatory product information and determining whether an exemption applies. This is clarified in the Directive No. 7/2026 of FDA.

Directive	FDA Directive No. 7/ 2026
Issued by	FDA, Ministry of Health
Issued on	April 10, 2026
Effective from	April 10, 2026
Who is affected?	Importers, distributors and food businesses dealing with imported prepackaged foods
Main change	Clarifies the implementation of Directive No. 5/2026

WHY WAS ANOTHER DIRECTIVE ISSUED?

Instead of immediately introducing new obligations, Directive No. 7/2026 explains **how businesses should interpret and apply Directive No. 5/2026.**

Following the issuance of Directive No. 5/2026, businesses raised practical questions regarding:

- whether all supplementary labels were prohibited;
- why sticker labels were no longer permitted; and
- whether any exceptions remained available.

Directive No. 7/2026 addresses these issues by providing the regulatory rationale behind the prohibition and confirming that the restriction is not absolute.

HOW THE REGULATORY FRAMEWORK FITS TOGETHER

Regulatory Stage	What Changed?
Directive No. 8/2022	Permitted supplementary labels where consumers could not understand the original language on the packaging.

Directive No. 5/2026	Introduced a prohibition on using stickers for supplementary labels on imported prepackaged foods.
Directive No. 7/2026	Clarifies the reason for the prohibition and confirms the circumstances in which the restriction does not apply.

WHY ARE STICKER LABELS PROHIBITED?

According to Directive No. 7/2026, sticker labels may cover important information already printed on the original packaging, such as:

- nutrition information;
- ingredient lists;
- manufacturer details;
- importer information; and
- distributor information.

The FDA's concern is therefore not simply the use of stickers themselves, but the possibility that consumers may be prevented from seeing mandatory information appearing on the original packaging.

WHEN DOES THE RESTRICTION NOT APPLY?

Directive No. 7/2026 also confirms that the prohibition is **not intended to apply in every situation.**

Directive No. 7/2026 confirms that the following situations are not affected by the prohibition:

Exception	Description
Full relabeling	Products whose labels are completely replaced or revised.
Infant and young children's food	Foods specifically formulated for infants and young children.
Other legal requirements	Labelling practices required under other applicable laws.

PRACTICAL CONSIDERATIONS FOR FOOD BUSINESSES

Businesses importing prepackaged foods should review their current labelling practices to determine whether supplementary labels are applied in a manner that obscures mandatory information.

Where sticker labels are currently used, businesses should assess whether:

- the product should instead be fully relabeled;
- an exemption under Directive No. 7/2026 is available; or
- changes to packaging are required before importation or distribution.

COMPLIANCE CHECKLIST

✓	Question
☐	Are supplementary labels obscuring any mandatory information on the original packaging?
☐	Have imported products been reviewed for compliance with Directives No. 5/2026 and No. 7/2026?

☐	Does the product qualify for one of the exemptions confirmed by Directive No. 7/2026?
☐	Where necessary, has the product been fully relabeled instead of using a sticker?

CONSEQUENCES OF NON-COMPLIANCE

Non-compliance with the FDA's labeling directives may subject businesses to severe criminal penalties under both food safety and consumer protection legislation:

- Under NFL, failure to adhere to labeling directives issued by FDA may carry a penalty of imprisonment for a term of up to 5 years and a fine ranging from MMK 300,000 to MMK 3,000,000.
- Under CPL, applying sticker labels that obscure mandatory product information may face imprisonment for up to 2 years, a fine of up to MMK 20 million, or both.

In light of the foregoing, businesses and companies dealing with imported prepackaged foods are advised to strictly comply with all FDA labeling directives to mitigate the risk of criminal sanctions, monetary penalties, and potential adverse regulatory consequences under the NFL and CPL.

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KEY CONTACTS:

Kaung Htet Zaw

Partner

T. 95-9-422525375

E. khz@iicole.com

Shwe Yee Thein

Paralegal

T. 95-9-453207299

E. syt@iicole.com