

A Guide to Food Labelling and Advertisements

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Introduction

This Guidebook aims to provide food importers, distributors, manufacturers, producers, packers and retailers (*hereinafter known as “**food business operators**”*) with a better understanding of the labelling requirements of the Food Regulations, as well as the permitted and prohibited claims for use in food labels and advertisements.

This Guidebook includes a [checklist](#) to assist food business operators to self-check their food labels and advertisements before sale/publication. Food business operators are responsible to ensure that their food products comply with the safety, specification standards and the labelling requirements stipulated under the Food Regulations.

In addition, food business operators are to refer to the Sale of Food Act and the Food Regulations for the actual legal text where necessary. The legislation can be downloaded from the following website: <https://sso.agc.gov.sg>.

Please note that the information and the [checklist](#) provided in the material do not serve as any form of certification or approval of food labels and advertisements.

Overview

The Singapore Food Agency (SFA) administers the Sale of Food Act and the Singapore Food Regulations to ensure that food made available for sale in Singapore are safe for consumption to safeguard public health.

The food labelling requirements under the Act and Regulations are primarily to support food safety regime. SFA takes reference from the international food standards setting body, the Codex Alimentarius Commission¹ (Codex), when reviewing the labelling requirements for Singapore.

Food label is one of the most important and direct means for sellers to communicate product information to buyers. It is one of the primary means by which consumers differentiate between individual foods and brands to make informed food choices at point of sale, before consuming. It also helps consumers to identify a food product in the case of food safety incident.

¹ *The Codex Alimentarius Commission is the international food standards body established by the Food and Agricultural Organisation of the United Nations and the World Health Organisation.*

All prepacked food products for sale in Singapore must be labelled according to the general labelling requirements of the Singapore Food Regulations. This includes prepacked food that are offered as a prize, reward or sample for the purpose of advertising.

Some pre-packed food products (*e.g. special purpose foods, foods with nutrition or health claims, etc.*) are required to meet additional labelling requirements.

For the purpose of this Guide, **prepacked food** product refers to any food product that is packed in a wrapper or container in advance, before being put up for sale.

Food label refers to any tag, brand, mark, or statement in words, pictures or diagrams, that is on, attached to, used, displayed in connection with or accompanying any food or package containing food. The label provides consumers with basic information of product such as the food product's source, nature, contents (*e.g. ingredients, allergens*), quantity and quality.

We would like to remind industry members that it is an offence to sell prepacked foods without proper labelling or to make false or misleading claims for food products. The penalties for non-compliance are stated under Section 49 of the Sale of Food Act and regulation 261 of the Food Regulations; relevant sections are quoted below:

Section 49 of the Sale of Food Act

Any person who is guilty of an offence under this Act for which no penalty is expressly provided shall be liable on conviction to a fine not exceeding \$5,000 and, in the case of a second or subsequent conviction, to a fine not exceeding \$10,000 or to imprisonment for a term not exceeding 3 months or to both.

Regulation 261 of the Food Regulations

Any person who contravenes or fails to comply with any of the provisions of these Regulations shall be guilty of an offence and shall be liable on conviction to a fine not exceeding \$1,000 and in the case of a second or subsequent conviction to a fine not exceeding \$2,000.

(A) General Labelling Requirements

All prepacked food for sale in Singapore must be labelled with the following mandatory information in English.

- | |
|--|
| <ul style="list-style-type: none">(a) Name or description of food(b) Statement of ingredients(c) Net quantity of food in package and(d) Name and address of local food business, and(e) Country of origin (<i>only for imported food products</i>) |
|--|

The Food Regulations do not specify the placing of the mandatory labelling information. However, the mandatory labelling information must be legible and should not be in any way hidden, obscured by any other written or pictorial matter.

The mandatory labelling information would also apply to pre-packed foods that are intended for human consumption and offered as a prize, reward or sample for the purpose of advertising.

The **use of sticker labels** to incorporate the mandatory labelling information in English on the labels of your food product is acceptable if the sticker label used is firmly attached on the product at all times, and it does not cover other essential information required under the Food Regulations.

The information made available on the sticker labels should not contradict with those declared on the original label. Please note that tampering of date marking (*i.e. expiry date*) declared on the original label, is prohibited under the Food Regulations.

(a) Name or description of food

A common name or description of the food provides consumers quick reference to the nature of the food they intend to purchase. It also helps to identify the food, especially in the event of a food safety incident. Refer to “Part IV – Standards and Particular Labelling Requirements for Food” of the Food Regulations to ensure that the terms used for the common name or the descriptions comply with the requirement.

Food business operators must ensure that name or description of the food is an accurate representation of its true nature and not be presented in a manner that is false, misleading or deceptive; or is likely to create an erroneous impression regarding its product content.

In particular, the name or description of the food must be declared **in printed letter not less than 1.5 mm in height**, based on the lowercase of the printed letter.



Tips to avoid misleading common names:

- *The common name or descriptor should not be misleading or confusing to consumers. A “coined”, “fanciful”, “brand” name or “trade mark” used, should be accompanied by the name or descriptor of the food.*
- *Abbreviations, including initials, should not be used as part of the product descriptor if they potentially lead to deception.*
- *Do not use words that do not reflect the actual composition of food contents (e.g. Products labelled as “Fruit biscuits” should therefore contain fruit components, whether in the form of fruit pulp, fruit juice or fruit flavouring.)*
- *“Alternative protein products should be qualified by appropriate terms such as “mock”, “cultured” or “plant-based” to indicate their true nature, so that consumers may make informed decisions when deciding whether to consume these products.”*
- *Improperly suggesting a place of origin (e.g. “Singapore noodles” on noodles which was not made in Singapore)*
- *Resembling, directly or phonetically, the name of another product for which it is an imitation or substitute (e.g. “bird’s nest drink” on an imitation bird’s nest product)*
- *False differentiation is not allowed (e.g. “Cholesterol free margarine” on margarine as all margarines are cholesterol free)*

(b) Statement of ingredients

Labels of pre-packed foods must bear a clear statement of ingredients that specifies the complete list of ingredients and additives used in the food. A statement of ingredients is required for prepacked food products containing two or more ingredients.

Unless the quantity or proportion of each individual ingredient is specified, all the ingredients and additives used must be listed in descending order of the proportions by weight in which they are present (*i.e. based the ingoing weight of the ingredient at point of manufacture, the ingredient that weighs the most must be listed first and the ingredient which weighs the least must be listed last*).

The exact identity or the permitted generic terms² of the ingredients and additives should be declared. International Numbering System (INS) number or E number can be used for declaration of food additives. It is not a requirement to state the functional class of the additives used. It is also not mandatory to state that a food contains water.

² Under regulation 5(4)(b) of the Food Regulations, the name and description of ingredients should indicate their true nature. Only generic terms listed in the First Schedule of the Food Regulations can be used for the respective food groups.

The use of the synthetic colouring matter, tartrazine must be disclosed under the statement of ingredients as either "tartrazine", or "colour (102)" or "colour (FD&C Yellow #5)" or similar words.

For compound ingredients which comprise more than one constituent, the constituents should be declared in descending order. For example, "soy sauce (soybean, black bean, salt, sugar)".

In particular, the statement of ingredients for the food must be declared **in printed letters not less than 1.5 mm in height**, based on the lowercase of the printed letter.

Declaration of processing aid

Processing aids, as stipulated in the Codex Procedural Manual, are exempted from the declaration in the list of ingredients.

- *“Processing aid means any substance or material, not including apparatus or utensils, and not consumed as a food ingredient by itself, intentionally used in the processing of raw materials, foods or its ingredients to fulfil a certain technological purpose during treatment or processing and which may result in the non-intentional but unavoidable presence of residues or derivatives in the final product.”*

This approach is aligned with the recommendations of Codex on the declaration of processing aids in the statement of ingredients, as laid out in the following standards:

- Codex General Standard for Labelling of Food Additives When Sold as Such (CXS107-1981) and
- Codex General Standard for the Labelling of Prepackaged Food (CXS 1-1985)

Food businesses must be able to justify the presence of undeclared processing aids in the final food product, as and when necessary.

How to declare statement of ingredients

The ingredients listing may start with a heading that includes the words "Ingredients".

STEPS	DESCRIPTION
1	<p>List down all the ingredients used in the food product in their exact identities* and arrange them in descending order by weight, <i>i.e. the ingredient that weighs the most must be listed first, while the ingredient that weighs the least must be listed last.</i></p>
2	<p>Identify the compound ingredients used in the food product, and find out the constituents of the compound ingredients by checking:</p> <ul style="list-style-type: none">• with your suppliers, or• the documents provided by suppliers (<i>e.g. product specification sheets</i>). <p>List out these constituents in descending order by weight in parenthesis next to the compound ingredients. E.g. "Batter (cornstarch, wheat flour, salt, sodium bicarbonate)".</p>
3	<p>Find out whether there are any simplified terms for the ingredients. See the First Schedule of the Food Regulations for the list of permitted generic terms. Otherwise, all ingredients must be listed in their exact identities*. For food additives, besides declaring their exact chemical names, you can use the International Numbering System (INS) or E numbers.</p>

4	<p>Check the presence of any ingredients or additives that are known to cause hypersensitivity and label their exact identities.</p> <p>For more information, see the section on <i>Foods & Ingredients Known to Cause Hypersensitivity</i>.</p>
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* *Exact identity refers to the specific name or description indicating the true nature of the ingredient.*

Options for declaring statement of ingredients

Food companies may choose to use one of the following options based on the company's needs.

Option 1: Declaration the full exact identities of ingredients and additives

Full cream milk, wheat flour, egg powder, vegetable margarine [Partially hydrogenated palm oil, salt, mono- and diglycerides of fatty acids, polyglycerol esters of fatty acids, butylated hydroxyanisole, butylated hydroxytoluene, butter flavor], sugar, salt, sodium bicarbonate, tartaric acid

Option 2: Declaration using a combination of permitted generic terms, INS numbers and full exact identities

Full cream milk, wheat flour, egg powder, vegetable margarine [Partially hydrogenated vegetable oil, salt, emulsifiers (INS 471 and INS 475), butylated hydroxyanisole (INS 320), butylated hydroxytoluene (INS 321), flavouring], sugar, salt, sodium bicarbonate (INS 500ii), tartaric acid (INS 334)

Option 3: Declaration by replacing the exact identities of ingredients and additives with permitted generic terms and INS numbers, respectively

Full cream milk, wheat flour, egg powder, vegetable margarine (partially hydrogenated vegetable oil, salt, emulsifiers, INS 320, INS 321, flavouring), sugar, salt, INS 500ii, INS 334

(c) Foods and ingredients known to cause hypersensitivity

Foods and ingredients that are known to cause hypersensitivity to individuals include those that causes allergenic reactions (*i.e. allergens*). As allergenic reactions like anaphylaxis could be life threatening, it is important that the addition of these ingredients is clearly declared on the food label.

What to declare

The following foods and ingredients are known to cause hypersensitivity and must be declared on food labels:

Table 1: List of food and ingredients known to cause hypersensitivity in individuals

(i)	Cereals containing gluten	This group includes wheat, rye, barley, oats, spelt or their hybridised strains and their products.
(ii)	Crustacean and crustacean products	This group includes crayfish, prawns, shrimps, lobsters, crabs and their products.
(iii)	Eggs and egg products	This group includes eggs from laying hens as well as eggs from duck, turkey, quail, goose, gull, guinea fowl and their products.
(iv)	Fish and fish products	This group also includes molluscs such as oysters, clams, scallops and their products.
(v)	Peanuts, soybeans and their products	Peanuts may be declared using similar terms such as “groundnuts”. Terms such as “soya” or “soy” can be used for soybeans.
(vi)	Milk and milk products (including lactose)	This group includes milk from cows, buffaloes, or goats and their products.
(vii)	Tree nuts and nut products	This group includes almond, hazelnut, walnut, cashew nut, pecan nut, Brazil nut, pistachio nut, macadamia nut and their products.
(viii)	Sulphites in concentrates of 10mg/kg or more	Food products that have sulphur dioxide and/or sulphites directly added and/or carried over from food ingredients at a total concentration of 10mg/kg or more (calculated in terms of total sulphur dioxide).

How to declare Foods & Ingredients Known to Cause Hypersensitivity

There are 2 ways to declare foods and ingredients known to cause hypersensitivity:

1. Using statement of ingredients
2. Using “contain” statement

Option 1: Declaration using statement of ingredients

All food ingredients and additives used in food products, including those listed as food ingredients and additives causing hypersensitivity must be declared clearly in the statements of ingredients in descending order by weight. Allergens should not be listed using generic terms. For compound ingredients comprising two or more food ingredients, the compositions in descending order by weight, should be declared in parenthesis next to the compound ingredients. For example, “Batter (cornstarch, wheat flour, salt, sodium bicarbonate)”

Option 2: Declaration using “Contains” statement

When a “Contains” statement is used, it should appear immediately after the statement of ingredients. However, information provided in the “Contains” statement should not contradict that declared in the statement of ingredients. All food ingredients and additives used in foods must be declared clearly in the statement of ingredients. The “Contains” statement should not be used to declare additional food ingredients/additives which are not declared in the statement of ingredients. Allergenic ingredients which are unintentionally introduced into foods such as through contamination or carried over from such ingredients during manufacturing, transportation, storage or any other means must not be declared in the “Contains” statement.



Tips for declaration of allergens

If the food allergen is...	Option 1: <i>Declaration using statement of ingredients</i>	Option 2: <i>Declaration using "Contains" statement</i>
<p>(i) <i>a food ingredient or a food additive</i></p> <p><i>Examples:</i> <i>Peanut oil, lecithin</i></p>	<p><i>Declare all ingredients in descending order by weight under the statement of ingredients. Generic terms should be avoided when declaring food allergens. For instance, generic terms such as "vegetable oil" and "emulsifier" should not be used for peanut oil and lecithin respectively. Refer to (iii) for proper declaration.</i></p>	<p><i>All ingredients must be declared in the statement of ingredients. If generic terms are used in the statement of ingredients, the food allergens can be declared in the "Contains" statement as follows:</i></p> <ul style="list-style-type: none"> <i>Contains:</i> <i>peanut, egg</i>
<p>(ii) <i>an ingredient of a compound ingredient</i></p> <p><i>Example:</i> <i>A cake made of batter</i></p>	<p><i>Constituents of compound ingredients must be declared in parenthesis next to the compound ingredients.</i></p> <p><i>Example:</i> <i>Batter (cornstarch, wheat flour, salt, sodium</i></p>	<p><i>If wheat flour is declared as "flour" in the statement of ingredients, the "Contains" statement can be used as follows:</i></p> <p><i>Contains: wheat</i></p>

containing bicarbonate)
wheat flour

<p>(iii) a food ingredient or food additive derived from allergenic sources</p>	<p>Description must be provided in order to highlight ingredients that are derived from allergenic sources.</p> <p>Examples: Peanut oil, lecithin (egg product), sodium caseinate (from milk)</p>	<p>A "Contains" statement can be provided to highlight the source of allergens for peanut oil, lecithin, sodium caseinate, as follows:</p> <p>Contains: peanut, egg, milk</p>
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Examples:
Peanut oil,
lecithin, sodium caseinate

Special considerations

- To be in line with international practice, when cereals, whey and nuts are used as distillates for alcoholic beverages, or fish gelatine or isinglass³ as fining/clarifying agents in beer and wine, these ingredients are not required to be declared on the label. Food business operators must bear full responsibility for ensuring that the information they choose not to declare does not, in fact, cause harm to consumers.
- The use of disclaimer statements such as “may contain” to declare the presence of ingredients known to cause hypersensitivity, when manufacturers cannot discount the possibility of cross contamination in their food products, is not encouraged. This may unnecessarily restrict consumer choice and undermine valid warnings.
- Food business operators whose products carry the “may contain” statement may be required to provide justification if consumers raise any concerns on potential food allergens in the products.

³ *Isinglass* is semi-transparent whitish gelatine prepared from the swim bladders of sturgeon and certain other fishes and is used as a clarifying agent in beer and wine.

(d) Net quantity of food in package

The net quantity of the food present in the package is required to be declared on the label. It must be in absolute values, and not expressed over a range of values.

For example,

Correct manner of declaration	Net Weight: 490g
Wrong manner of declaration	Net Weight: 500g +/- 10g

The net weight of a prepacked food product containing for example 20 mini sachets of 25g each may be declared as "Net weight: 20 x 25g".

The net quantity may be derived using the Minimum Quantity System or the Average Quantity System.

The net quantity of the food present in the package can be expressed in terms of:

- (i) Volumetric measure (*e.g. millilitres, litres*) for liquid food products
- (ii) Net weight (*e.g. grams, kilograms*) for solid food products and accompanied with the word, "net"
- (iii) Either volumetric measure or net weight for semi-solid/viscous products (*e.g. tomato paste, yoghurt*).

Food packed in a liquid medium⁴ must be labelled with both “net weight” and “drained weight” declared.

Examples of products that require drained weight declaration:

- (i) Products with liquid packing medium which is drained away prior to consumption of the product. The products include canned seafood in brine e.g. abalone, pacific clams, tuna, crabmeat and canned vegetables in brine such as button mushrooms, whole corn kernels, chickpeas, ginkgo nuts in water.
- (ii) Preserved/pickled products in liquid medium with salt, vinegar or sugar. The liquid medium is neither drained away nor consumed. The products include pickled green chilli, cucumbers, onions, capers, mustard greens, preserved ginger, salted plums.
- (iii) Canned fruit and vegetable packed in juices or sugar syrups. For this instance, juice content is not a decisive factor to purchase. The products include canned rambutans in pineapple juice, peaches, pears, lychees, longans in light syrup, fruit cocktail in syrup.

⁴ Liquid medium is defined as water, aqueous solutions of sugar and salt, fruit and vegetable juices in canned fruits and vegetables only, or vinegar, either singly or in combination.

Examples of products that do not require drained weight declaration:

- (i) Products for drinking which contain solid bits. For such products, the liquid portion forms the most part of the product. These products include grass jelly drink, fruit juice with aloe vera bits, juice drink with nata de coco, birds' nest flavoured drink with jelly, bottled hashima dessert.
- (ii) Products containing solid food in gravy, paste or sauce which are meant to be consumed as a dish. The products include shark's fin soup, peanut soup, curry chicken, sardines and baked beans in tomato sauce, fried gluten in soy sauce, braised peanuts and vegetarian mock meat in soy sauce, kimchi and sauerkraut.
- (iii) Products containing solid food in oil predominantly. The products include canned seafood such as tuna, anchovies in vegetable oil, sundried tomato in oil and fermented beancurd.
- (iv) Products containing solid food with small amount of water due to syneresis. The products include beancurd and jelly.

Note: The above examples are not exhaustive and are for illustration only. Companies may approach SFA on the declaration of "drained weight" for specific products.

For frozen food that has been glazed with ice, the net weight declared for such product excludes the weight of the ice glazing.

In particular, the net quantity of the food must be declared **in printed letter not less than 1.5 mm in height**, based on the lowercase of the printed letter.

(e) Name and address of food business and country of origin

To facilitate food traceability during a food safety recall/crisis, it is mandatory for prepacked food products to be labelled with the following information:

- (i) Name and address of the local food business
- (ii) Country of origin of food product (*only for imported food products*)

(i) Name and address of the local food business

For imported food products, the label must indicate the name and address of the local importer, distributor or agent.

For food products of local origin, labels must include the name and address of the local manufacturer/producer, packer or vendor.

Replacing the name and address with other contact information for example, telephone/fax numbers, websites, emails and post office addresses etc are not acceptable.

(ii) Country of origin of food


Labels on imported food products must indicate the country of origin of the food. The name of a city, town or province alone is

not acceptable. The use of abbreviations is not recommended if the abbreviations would result in confusion to consumers.

Declaration on country of origin is not mandatory for food products manufactured/produced locally. This is because locally manufactured food products are manufactured by food establishments licensed by SFA and these food manufacturers must inform SFA of the manufacture of the food. As this information is enough to enable traceability, it is not mandatory for the country of origin (*i.e. Singapore*) to be declared on the packaging. Nonetheless, local manufacturers may choose to include it on a voluntary basis.

In line with the Codex, the 'country of origin' refers to the last processing place of the food. In Singapore's context, it would be the country where the handling of the food last took place (*i.e. when food was packed into primary packaging*).

Products that are produced in Country A and packed in Singapore, may be labelled as "Product of Country A. Packed in Singapore", or just "Packed in Singapore". To qualify for the use of the terms "Product of Singapore" or "Made in Singapore", the product should undergo manufacturing processes to change the nature of the food in premises licensed by SFA.

 **Tips on how to declare**

Description of manufacturing scenario	Manner of declaration
<i>The product is farmed and processed/packed in Singapore.</i>	<ul style="list-style-type: none">• <i>“Farmed and produced in Singapore”</i>• <i>“Singapore produce”</i>• <i>“Product of Singapore”</i>
<i>The product should undergo significant manufacturing process, which usually changes the nature of the original product, in a licensed premise in Singapore.</i>	<ul style="list-style-type: none">• <i>“Product of Singapore”</i>• <i>“Made in Singapore”</i>

The above are suggested words only and it is for the food businesses to ensure accuracy when using these declarations.

Some Singapore food business operators may develop a formulation/recipe of a product or buy over its ownership but choose to manufacture the product overseas. To indicate the relation of the product with national identity, the products may be labelled with words like “A Singapore brand” / “Product owned by Singapore” / “Singapore formula”, as appropriate. However, the actual country of origin (*i.e. last processing place*)

for the food must be clearly declared so that it would not hinder traceability of the product, and consumers are not misled by such declaration.

(B) Exemptions

General labelling requirements do not apply under these conditions. However, the same information must be provided to the buyer of the product when requested, through means like voluntary labelling, documentation, electronic platform or verbal communication.

- Food packed in non-retail containers (*i.e. for supply to food manufacturers or food services for further use*). Food business operators may wish to include information of the food on the non-retail containers on a voluntary basis.
- Non-prepacked (loose) foods, i.e. food which is weighed, counted or measured in the presence of the purchaser and food which is loosely packed in the retailer's premises are exempted from these general labelling requirements.
- Foods sold loose in retail outlets, for example cold meats or cheeses sold from delicatessen counter, bread sold in bakery shops, meat sold at butchers, pick and mix confectionery.
- Foods which are not sold pre-packed, such as meals served in a restaurant and food from a takeaway.

Intoxicating liquors (*liquor containing more than 0.5% (v/v) alcohol at 20°C*) are not required to carry a statement of ingredients on their labels.

Bread which is sold loosely packed in retailer's premises is not required to carry a statement of ingredients as the food business operators would be able to verbally furnish such information to customers directly.

(C) Additional Labelling Requirements

(a) Date-marking of expiry date

All foods sold in Singapore must be safe for consumption. The expiry date marking indicates when a food product may not be safe to consume or loses its normal quality and nature. The food manufacturer is responsible for:

- establishing the shelf life; and
- ensuring that the unopened food is safe and of the expected quality throughout the shelf life when stored according to the stated storage conditions.

The prepacked foods listed in **Table 2** are required to be labelled with their expiry dates. These prepacked products include perishable or short shelf-life products (*e.g. pasteurised milk*), products whose quality may deteriorate over time (*e.g. cooking oil*), products that are susceptible to contamination, such as insect infestation, after prolonged storage (*e.g. breakfast cereals*) and infant food. Food business operators must ensure that their food products available for sale in Singapore meet our food safety standards and requirements throughout their shelf-life.

Expiry date may be presented in one of the following ways:

- USE BY (dd/mm/yy)
- EXPIRY DATE (dd/mm/yy)
- SELL BY (dd/mm/yy)
- BEST BEFORE (dd/mm/yy)

The date-marking must be permanently marked or embossed on the package and printed **in letters not less than 3mm in height**. Date mark shall not be removed, altered, obscure, superimposed or tampered in any manner.

While these terms have different technical meanings, under the Food Regulations, these terms are taken to be the same meaning and the import, distribution and sale of foods that have passed their expiry dates are prohibited.

This is because the food may no longer be at specific quality claimed by the food manufacturer or safe to be consumed. In addition, it facilitates practical regulatory oversight to prevent tampering of date mark, considering that a significant portion of Singapore's food is imported, and that exporting countries may have different format and definitions for these terms.

Food products that are stored or handled incorrectly can be unsafe to consume even if their expiry date has not passed. If

specific storage conditions are required for a food to keep until its expiry date, food manufacturer is required to state the storage direction of that food on its label. Examples include “Store in a cool, dry place” and “Keep refrigerated”.

Table 2: List of prepacked foods required to be date marked

List of prepacked foods that is required to be date-marked with their expiry dates	Format of date marking
1. Cream, reduced cream, light cream, whipped cream and sour cream excluding sterilised canned cream.	The year of the date mark is optional. For example, the expiry
2. Cultured milk and cultured milk drink.	date of pasteurised
3. Pasteurised milk and pasteurised milk drink.	milk can be declared as " 31 May 2021 " or
4. Yoghurt, low-fat yoghurt, fat-reduced yoghurt, non-fat yoghurt and yoghurt products.	"31 May" .
5. Pasteurised fruit juice and pasteurised fruit juice drink.	
6. Pasteurised vegetable juice and pasteurised vegetable juice drink.	
7. Tofu, "taufu" or "doufu", a soya beancurd product made of basically soya beans, water and a coagulant, including "egg tofu", "taukau" or "dougan", and the soft soya beancurd dessert known as "tauhui", "tofa", or "douhua", but excluding the oil fried	

tofu in the form of a pouch known as "taupok", and the fried beancurd stick.

8. Food which is stored or required to be stored at a chilling temperature to maintain or prolong its durable life, including ready-to-eat minimally processed fruits and vegetables⁵ such as cut fruits and vegetables but excluding all other forms of raw fruits and vegetables.

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9. Vitaminised fruit juice and vitaminised fruit juice drink. The day of the date mark is optional. For
10. Vitaminised vegetable juice and vitaminised vegetable juice drink. example, the expiry date of infants' food
11. Liquid milk and liquid milk products excluding condensed milk, sweetened condensed milk, evaporated milk and canned sterilized milk and milk products. can be declared as either "**31 May 2021**" or "**May 2021**".
12. Flour.
13. Salad dressing.
14. Mayonnaise.
15. Raisins and sultanas.
16. Chocolate, milk chocolate and chocolate confectionery in which the
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⁵ Minimally processed fruits and vegetables refer to fresh fruits and vegetables that have been peeled, cored, sliced, chopped, shredded, prior to being packaged for sale and/or ready for consumption.

characteristic ingredient is chocolate or cocoa, with or without the addition of fruits or nuts.

17. Breakfast-cereal with or without fruit and nuts except cereal in cans.
 18. Infants' food.
 19. Edible cooking oils.
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(b) Serving suggestions

Recipes or suggestions or pictorial illustrations on how to serve prepacked foods may be included on food labels only if they are closely accompanied by the words “Recipe” or “Serving Suggestion”, in printed letters of a minimum of 1.5 mm in height.

Pictorial illustrations that are used to imply that the product contains certain food ingredients must be an accurate representation of the contents in the product.

(c) Foods containing sweetening agents

The Thirteenth Schedule of the Food Regulations lists the food categories and the maximum permitted levels for use of these sweetening agents: acesulfame-K, saccharin and its calcium, potassium and sodium salts, cyclamic acid and its calcium and sodium salts, neotame, steviol glycosides and sucralose.

Tables 3 (a) & (b) list the food categories which are required to be labelled with advisory statements on consumption by children if certain sweetening agents are added at the maximum permissible levels.

Table 3 (a): Food categories that require an advisory statement on product labels that children 9 years old and below should not consume more than 2 servings a day, based on serving size of 250mL.

Category	Sweetening agents and the maximum permissible level
Dairy-based drinks (flavoured and/or fermented)	When added with (i) 350ppm acesulfame-K and/or (ii) 250ppm cyclamates (as cyclamic acid)
Fruit drinks	When added with (i) 350ppm acesulfame-K and/or (ii) 250ppm cyclamates (as cyclamic acid) and/or (iii) 125ppm steviol glycosides (as steviol)
Vegetable juice drinks	When added with (i) 350ppm acesulfame-K and/or (ii) 400ppm cyclamates (as cyclamic acid) and/or (iii) 125ppm steviol glycosides (as steviol)

Table 3 (b): Food categories that require an advisory statement on product labels that children 9 years old and below should not consume more than 1 serving a day, based on serving size of 140g.

Category	Sweetening agents and the maximum permissible level
Canned or bottled (pasteurised) fruit	When added with (i) 1000ppm cyclamates (as cyclamic acid)

(d) Special purpose foods

Special purpose foods are foods formulated to cater for the special dietary needs of specific group of consumers. These products are usually food substance modified, prepared or compounded to possess nutritive and assimilative properties to meet the special dietary needs of these individuals.

The products may be added with vitamins, minerals, amino acids and other nutrient supplements permitted under the Food Regulations.

Special purpose foods must be labelled clearly with its special suitability such as diabetic food, low sodium food, gluten-free food, low protein food, carbohydrate-modified food, low calorie food, energy food, infant formula and formulated food. They should also meet the nutrition labelling requirements (*refer to “Nutrition Labelling” for more information*).

(i) Sugar-free foods

Special purpose foods may only be labelled as “sugar-free” or words of similar meaning if they contain equal or less than 0.5g sugar per 100g or 100ml.

Sugars refer to simple carbohydrates that are molecules of either single sugar units (*monosaccharides*) or pairs of those sugar units (*disaccharides*) bonded together. They include hexose monosaccharides and disaccharides (*e.g., dextrose, fructose, sucrose and lactose*), starch hydrolysate, glucose syrups, maltodextrin and sugars derived at a sugar refinery (*e.g., icing sugar, invert sugar, fruit sugar syrup*).

(ii) Low-calorie foods

Low-calorie foods refer to special purpose foods that are suitable for individuals adopting a restricted diet by the calorie content. **Table 4** shows the type of low-calorie food and the permissible calorie content:

Table 4: Types of low calorie food and criteria

Food type	Calorie content (less or equal to the stipulated amount)
Beverages (ready for consumption)	8 kcal/100 ml
Bread spreads including jam substitutes	100 kcal/100 g
All other foods	50 kcal/ 100 g

(iii) Diabetic foods

Diabetic foods refer to special purpose foods that are particularly suitable for diabetics. The nutrition information panel of these products should also include a statement indicating the type of the carbohydrates present in the food such as sugar and starch.

(iv) Infants' food and infant formula

Infants' food is any food suitable for infants⁶ and includes infant formula formulated for infants from birth to 12 months of age. Infants' food for infants over the age of 6 months is intended for feeding infants as a complementary food.

Details on the labelling requirements for these foods can be found under regulations 251 to 254 of the Food Regulations. The industry guidance and frequently asked questions can be downloaded from the following SFA websites:

- <https://www.sfa.gov.sg/docs/default-source/legislation/sale-of-food-act/guidance-document-on-labelling-requirements-for-infant-formula.pdf>
- [https://www.sfa.gov.sg/docs/default-source/legislation/sale-of-food-act/frequently-asked-questions-\(regulatory-amendments-on-labelling-requirements-for-infant-formula\).pdf](https://www.sfa.gov.sg/docs/default-source/legislation/sale-of-food-act/frequently-asked-questions-(regulatory-amendments-on-labelling-requirements-for-infant-formula).pdf)

⁶ The Food Regulations define "infant" as a person not more than 12 months of age.

No label or advertisement for infants' food, other than infant formula formulated for infants from birth to 6 months of age, shall state or imply that such food is suitable for infants of or below 6 months of age.

In addition, the promotion, marketing and distribution practices of infant formula should comply with the requirements of the "Code of Ethics on the Sale of Infant Foods in Singapore". This Code is administered by the Sale of Infant Foods Ethics Committee Singapore (SIF ECS) which is administered by the Health Promotion Board (HPB). The soft copy of the code can be downloaded from the following HPB website:

<https://www.hpb.gov.sg/healthy-living/food-beverage/sifecs>

Enquiries on SIF ECS matters may be sent to the email address:
HPB_SIF ECS@hpb.gov.sg

(e) Nutrition labelling

Nutrition labelling is required when nutrition claims or permitted health claims are made. More information about these claims can be found in the following topics of this material. The Food Regulations require nutrient declaration in an acceptable nutrition information panel, for prepacked foods for which nutrition claims are made. The information to be declared in the panel includes the energy, protein, fat and carbohydrate

contents of the food. Declaration of other nutrients is mandatory when such nutrients are the subject of a nutrition claim. An acceptable nutrition information panel, which can also be found in the Twelfth Schedule of the Food Regulations, is shown in **Table 5**.

Table 5: Form for Nutrition Information Panel

Nutrition information		
Servings per package (here insert number of servings)*		
Serving size: (here insert the serving size)*		
	Per Serving* or	Per 100 g (or 100mL)
Energy	kcal, kJ or both	kcal, kJ or both
Protein	g	g
Fat	g	g
Carbohydrate	g	g
(here insert the nutrients for which nutrition claims are made, or any other nutrients to be declared)**	g	g
* Applicable only if the nutrients are declared on a per serving basis.		
** Amounts of sodium, potassium and cholesterol are to be declared in mg.		

Note: Refer Twelfth Schedule of the Food Regulations or HPB's "Handbook on Nutrition Labelling", which may be downloaded from the following website, <https://www.hpb.gov.sg/food-beverage/healthier-choice-symbol>

The Singapore Food Regulations do not stipulate the tolerance level for variance in the nutrient values declared under the nutrition information panel. Food business operators must ensure that the information provided under the nutrition information panel is truthful and can be supported by a nutrient analysis test report from an accredited laboratory, throughout the shelf life of the product. More information on the declaration of nutrition information can also be found in [Handbook on Nutrition Labelling](#) published by the Health Promotion Board.

(f) Foods claimed to be source of energy or protein

Foods claimed to be a source of energy are required to state on their labels the quantity of that food to be consumed in one day, which should yield at least 300 kcal. The labels should also include an acceptable nutrition information panel.

Foods claimed to be a source, or an excellent source of protein should include on the label the quantity of that food to be consumed in one day, and an acceptable nutrition information panel. To claim as a source of protein, at least 12% of the total calorie yield of the food should be derived from protein. To claim as an excellent source of protein, at least 20% of the total calorie yield of the food should be derived from protein. In addition, the amount of food stated on the label as the quantity to be consumed in one day should also contain at least 10g of protein.

Examples of the daily recommendation statement are “Recommended daily intake: 3 servings”; “Add 20g powder in 200ml water. Drink 2 times daily.”

(g) Specific labelling requirements for certain food categories

Specific labelling requirements are stipulated for certain food categories under their individual specification standards. Please refer to **Table 6** for examples of food categories with specific labelling requirements.

Table 6: Food with specific labelling requirements

Food type	Food Regulations
Irradiated food	Regulation 38
Wholegrain	Regulation 40A
Bakery products	Regulation 53
Edible fats and oils	Regulation 79
Milk	Regulation 109
Coffee (coffee and chicory, coffee mixture, instant or soluble coffee and chicory)	Regulation 158, 159, 161
Fruit juice	Regulation 171
Natural mineral water	Regulation 183A
Fruit wine	Regulation 195
Compounded liquor	Regulation 210
Infant formula	Regulation 254
Rice	Regulation 260

(h) Advisory statements

Products containing the ingredients listed below would need to be labelled with the relevant advisory statements or any other statements to the same effect.

Aspartame
Regulation 5(4)(f)

“Phenylketonurics: Contains phenylalanine”

Royal jelly
Regulation 151A

“Warning: This product may not be suitable for asthma and allergy sufferers.”

Natural mineral water containing more than 1ppm of fluoride
Regulation 183A

“Contains fluoride”

Natural mineral water containing more than 1.5ppm of fluoride
Regulation 183A

“Contains fluoride. The product is not suitable for infants and children under the age of seven years”

(D) Prohibited Claims on Food Labels and Advertisements

Under regulation 9 of the Food Regulations, false or misleading statement, word, brand, picture, or mark purporting to indicate the nature, stability, quantity, strength, purity, composition, weight, origin, age, effects, or proportion of the food or any ingredients are not allowed to be used on food labels and advertisements, unless otherwise specified.

The use of claims for therapeutic or prophylactic action; claims which could be interpreted as advice of a medical nature from any person; claims that a food will prevent, alleviate or cure any disease or condition affecting the human body; and claims that health or an improved physical condition may be achieved by consuming any food, is prohibited.

The use of health claims on infant formula is also prohibited.

A list of examples on prohibited claims can be found in [Appendix I](#).

Signs and symbols may sometimes be used in a manner that is false, misleading or deceptive to create an erroneous impression regarding the value, merit and safety of the food.

[Appendix II](#) provide guidelines on the use of signs with implied claims.

(E) Use of Nutrition Claims and Health Claims

(a) Nutrition claims

Nutrition claims are claims that suggest or imply a food has a nutritive property or the comparison of the nutritive property in terms of energy, salt (sodium or potassium), amino acids, carbohydrates, cholesterol, fats, fatty acids, fibre, protein, starch or sugars, vitamins or minerals, or any other nutrients.

Examples of nutrition claims are "Low in calories", "Sugar free" and "Reduced sodium". Nutrition claims are allowed if the requirements of the Food Regulations and the nutrient claims guidelines published in "A Handbook on Nutrition Labelling" by Singapore's Health Promotion Board (HPB) are complied with.

Foods that carry claims on the presence of vitamins and/or minerals, including claims relating to "a source of" vitamins/minerals, are required to contain at least one-sixth of the daily allowance as laid down in **Table 7** for the relevant vitamin or mineral, per reference quantity for that food as laid down in **Table 8**.

Foods that claim to be an excellent source (*including words like "good", "rich" and "high"*) of vitamins and/or minerals are

required to contain at least 50% of the daily allowance as laid down in **Table 7** for the relevant vitamin or mineral, per reference quantity for that food as laid down in **Table 8**.

Table 7: Daily allowances of vitamins and minerals

Substances	VITAMINS AND MINERALS To be calculated as	Daily Allowance
Vitamin A, vitamin A alcohol and esters, carotenes	Micrograms of retinol activity	750 mcg
Vitamin B1, aneurine, thiamine, thiamine hydrochloride, thiamine mononitrate	Milligrams of thiamine	1 mg
Vitamin B2, riboflavin	Milligrams of riboflavin	1.5 mg
Vitamin B6, pyridoxine, pyridoxal, pyridoxamine	Milligrams of pyridoxamine	2.0 mg
Vitamin B12, cobalamin, cyanocobalamin	Micrograms of cyanocobalamin	2.0 mcg
Folic acid, folate	Micrograms of folic acid	200 mcg
Niacine, niacinamide, nicotinic acid, nicotinamide	Milligrams of niacin	16 mg
Vitamin C, ascorbic acid	Milligrams of ascorbic acid	30 mg
Vitamin D, vitamin D2, vitamin D3	Micrograms of cholecalciferol	2.5 mcg
Calcium	Milligrams of calcium	800 mg
Iodine	Micrograms of iodine	100mcg
Iron	Milligrams of iron	10 mg
Phosphorus	Milligrams of phosphorus	800 mg

Table 8: Reference quantity of food

Food	Reference Quantity
Bread	240 g
Breakfast cereals	60 g
Extracts of meat or vegetables or yeast (modified or not)	10 g
Fruit and vegetable juices	200 ml
Fruit juice concentrates (diluted according to directions on the label)	200 ml
Fruit juice cordials (diluted according to directions on the label)	200 ml
Flavoured cordials or syrups (diluted according to directions on the label)	200 ml
Malted milk powder	30 g
Condensed milk	180 g
Milk powder (full cream or skimmed) and food containing not less than 51% of milk powder	60 g
Other concentrated liquid food including powdered beverage above (diluted according to directions on the label)	200mL
Liquid food not specified above	200mL
Solid food not specified above	120g

(b) Health claims

(i) Nutrient function claims and other function claims

In principle, nutrient function claim (see [Appendix III](#) for definition) may be allowed if the following criteria are met:

- The claim is about essential nutrients that have established their recommended intakes and/or are of nutritional importance.
- There is enough generally accepted scientific evidence to prove the suggested function or role of the nutrient as claimed.
- The claim enables the public to understand the information provided and its significance to their overall daily diet.
- The nutrient mentioned is present in an amount that either meets the requirements of the Food Regulations i.e. 1/6 of daily allowances for vitamins and mineral per reference quantity (*refer to regulation 11*), or the requirements of the nutrient claim guidelines established by the Health Promotion Board. The product carrying the claim should also be labelled in accordance with the requirements of the Food Regulations for use of nutrition claims.
- The claim does not state or imply that the nutrient is for prevention or treatment of a disease.
- The approved claims must not be truncated or reworded to deviate from the original intended meaning.

List of acceptable nutrient function claims

Macronutrients		
Nutrient	Claim	Criteria
Protein	1. Protein provides the essential amino acids needed to aid in the building and maintenance of body tissues.	<ul style="list-style-type: none"> • At least 12% by weight of calorie yield of food is derived from protein • The amount of food to be consumed per day contains at least 10g of protein • The quantity of food to be consumed per day must be declared
	2. Protein helps in tissue building and growth	
Lactose	1. Low lactose content allows easier digestions	<ul style="list-style-type: none"> • $\leq 5\text{g}$ lactose in per 100g of solid food; or $\leq 2.5\text{g}$ lactose in per 100ml of liquid food • The amount of lactose must be declared under the nutrition information panel
	2. Low lactose content eases digestion for people who are lactose intolerant	
Dietary Fibre	1. Dietary fibre aids in digestive system	<ul style="list-style-type: none"> • $\geq 3\text{g}$ per 100g of solid food or 100ml of liquid food • The amount of dietary fibre must be declared under the nutrition information panel

Vitamins		
Nutrient	Claim	Criteria
Vitamin A (calculated as retinol activity)	1. Vitamin A is essential for the functioning of the eye	<ul style="list-style-type: none"> • $\geq 125\text{mcg}$ of vitamin A in per reference quantity of the food as specified Table 8 in section “Nutrition claims” • The amount of vitamin A must be declared under the nutrition information panel
	2. Vitamin A helps to maintain normal skin and mucous membrane.	
	3. Vitamin A contributes to the normal function of the immune system	
Vitamin B1 (thiamin)	1. Vitamin B1 helps to release energy from proteins, fats and carbohydrates	<ul style="list-style-type: none"> • $\geq 0.167\text{mg}$ of thiamin in per reference quantity of the food as specified Table 8 in section “Nutrition claims” • The amount of thiamin must be declared under the nutrition information panel
	2. Vitamin B1 contributes to normal functioning of the nervous system	
	3. Vitamin B1 contributes to the normal functioning of the heart	
Vitamin B2 (riboflavin)	1. Vitamin B2 helps to release energy from proteins, fats and carbohydrates	<ul style="list-style-type: none"> • $\geq 0.25\text{mg}$ of riboflavin in per reference quantity of the food as specified Table 8 in section “Nutrition claims” • The amount of riboflavin must be declared under the nutrition information panel
	2. Vitamin B2 contributes to the reduction of tiredness and fatigue	
	3. Vitamin B2 contributes to the maintenance of normal skin	
	4. Vitamin B2 contributes to the maintenance of normal red blood cells	
	5. Vitamin B2 contributes to maintenance normal vision	
	6. Vitamin B2 contributes to normal functioning of the nervous system	
	7. Vitamin B2 contributes to the protection of cells from oxidative stress	

Vitamins		
Nutrient	Claim	Criteria
Vitamin B3 (niacin)	1. Vitamin B3 helps to release energy from proteins, fats and carbohydrates	<ul style="list-style-type: none"> • ≥ 2.67mg of niacin in per reference quantity of the food as specified Table 8 in section "Nutrition claims" • The amount of niacin must be declared under the nutrition information panel
	2. Vitamin B3 contributes to the reduction of tiredness and fatigue	
	3. Vitamin B3 contributes to the maintenance of normal skin	
	4. Vitamin B3 contributes to normal functioning of the nervous system	
Vitamin B5 (Pantothenic acid)	1. Pantothenic acid contributes to normal energy productions	<ul style="list-style-type: none"> • ≥ 0.75mg of pantothenic acid in per 100g of food, or ≥ 0.38mg pantothenic in per 100ml of food • The amount of pantothenic acid must be declared under the nutrition information panel
	2. Pantothenic acid contributes to the reduction of tiredness and fatigue	
	3. Pantothenic acid contributes to normal mental performance	
Vitamin B6 (pyridoxine)	1. Vitamin B6 is important for the production of energy	<ul style="list-style-type: none"> • ≥ 0.33mg of pyridoxine in per reference quantity of the food as specified Table 8 in section "Nutrition claims" • The amount of pyridoxine must be declared under the nutrition information panel
	2. Vitamin B6 contributes to the reduction of tiredness and fatigue	
	3. Vitamin B6 contributes to normal functioning of the nervous system	
	4. Vitamin B6 contributes to the normal red blood cell formation	
	5. Vitamin B6 contributes to the normal function of the immune system	
	6. Vitamin B6 contributes to normal homocysteine metabolism	
	7. Vitamin B6 contributes to the regulation of hormonal activity	

Vitamins		
Nutrient	Claim	Criteria
Vitamin B12 (cyanocobalamin)	1. Vitamin B12 is necessary for fat, carbohydrate and protein metabolism	<ul style="list-style-type: none"> • ≥ 0.33mcg of cyanocobalamin in per reference quantity of the food as specified Table 8 in section "Nutrition claims" • The amount of cyanocobalamin must be declared under the nutrition information panel
	2. Vitamin B12 is needed for/helps in the formation of red blood cells	
	3. Vitamin B12 contributes to the reduction of tiredness and fatigue	
	4. Vitamin B12 contributes to normal functioning of the nervous system	
	5. Vitamin B12 contributes to the normal function of the immune system	
	6. Vitamin B12 contributes to normal homocysteine metabolism	
Folate (folic acid)	1. Folate contributes to normal immune system function	<ul style="list-style-type: none"> • ≥ 33.33mcg of folic acid in per reference quantity of the food as specified Table 8 in section "Nutrition claims" • The amount of folic acid must be declared under the nutrition information panel
	2. Folate contributes to the reduction of tiredness and fatigue	
	3. Folate contributes to normal homocysteine metabolism	
	4. Folate contributes to normal amino acid synthesis	
Folate (folic acid) – claims for food for pregnant women only	5. Folate helps support foetus' growth and overall development	
	6. Folate plays a role in the formation of red blood cells	
	7. Folate, taken before and during early pregnancy, helps in the mental/normal and overall development of foetus	
	8. Folic acid is essential/important for growth and division of cells	

Vitamins		
Nutrient	Claim	Criteria
Vitamin C	1. Vitamin C enhances absorption of iron from non-meat products	<ul style="list-style-type: none"> • $\geq 5\text{mg}$ of vitamin C in per reference quantity of the food as specified Table 8 in section "Nutrition claims" • The amount of vitamin C must be declared under the nutrition information panel
	2. Vitamin C contributes to normal collagen formation for the normal function of blood vessels	
	3. Vitamin C contributes to normal collagen formation for the normal function of bones	
	4. Vitamin C contributes to normal collagen formation for the normal function of cartilage	
	5. Vitamin C contributes to normal collagen formation for the normal function of gums	
	6. Vitamin C contributes to normal collagen formation for the normal function of skin	
	7. Vitamin C contributes to normal collagen formation for the normal function of teeth	
	8. Vitamin C contributes to normal functioning of the immune system	
	9. Vitamin C contributes to normal functioning of the nervous system	
	10. Vitamin C contributes to the reduction of tiredness and fatigue	
	11. Vitamin C contributes to the protection of cells from oxidative stress	
Vitamin D	1. Vitamin D helps support calcium absorption and improves bone strength	<ul style="list-style-type: none"> • $\geq 0.42\text{mcg}$ of vitamin D in per reference quantity of the food as specified Table 8 in section "Nutrition claims" • The amount of vitamin D has to be declared under
	2. Vitamin D helps the body utilise calcium and phosphorus	
	3. Vitamin D contributes to normal blood calcium	

Vitamins		
Nutrient	Claim	Criteria
	<p>levels</p> <p>4. Vitamin D contributes to the maintenance of normal muscle function</p> <p>5. Vitamin D contributes to the maintenance of normal teeth</p> <p>6. Vitamin D contributes to the normal function of the immune system</p>	<p>the nutrition information panel</p>
Vitamin E	<p>1. Vitamin E is an antioxidant that helps protect cells in the body</p> <p>2. Antioxidants like vitamin E help to protect cells from free radicals that may have escaped the natural process of our body system</p>	<ul style="list-style-type: none"> • ≥ 1.67mg of vitamin E in per reference quantity of the food as specified Table 8 in section "Nutrition claims" • The amount of vitamin E must be declared under the nutrition information panel
Vitamin K	<p>1. Vitamin K is necessary for normal blood coagulation</p>	<ul style="list-style-type: none"> • ≥ 9mcg of vitamin K in per 100g of food, or ≥ 4.5mcg vitamin K in per 100ml of food • The amount of vitamin K must be declared under the nutrition information panel
Biotin	<p>1. Biotin contributes to normal energy-yielding metabolism</p> <p>2. Biotin contributes to normal macronutrient metabolism</p> <p>3. Biotin contributes to the maintenance of normal hair</p>	<ul style="list-style-type: none"> • ≥ 4.5mcg of biotin in per 100g of food, or ≥ 2.25mcg biotin in per 100ml of food • The amount of biotin must be declared under the nutrition information panel
Choline	<p>1. Choline contributes to normal lipid metabolism</p> <p>2. Choline contributes to the maintenance of normal liver function</p>	<ul style="list-style-type: none"> • ≥ 82.5mg of choline in per 100g or 100ml or per single serving of food • The amount of choline must be declared under the nutrition information panel

Vitamins		
Nutrient	Claim	Criteria
Choline - <i>claims only for food for children up to 6 years of age</i>	3. Choline helps support overall mental functioning for children up to 6 years of age	<ul style="list-style-type: none"> • Food must be labelled clearly for this age group • The amount of choline must be declared under the nutrition information panel
Combined vitamin claims		
Vitamin K and D	1. Vitamins K and D work synergistically on bone metabolism to improve bone strength/build strong bones	<ul style="list-style-type: none"> • ≥ 0.42mcg of vitamin D in per reference quantity of the food as specified Table 8 in section "Nutrition claims" • ≥ 9mcg of vitamin K in per 100g of food, or ≥ 4.5mcg vitamin K in per 100ml of food • The amounts of vitamins D and K must be declared under the nutrition information panel

Minerals		
Nutrient	Claim	Criteria
Calcium	1. Calcium helps build/to support development of strong bones and teeth.	<ul style="list-style-type: none"> • ≥ 133.33mg of calcium in per reference quantity of the food as specified Table 8 in section "Nutrition claims" • The amount of calcium must be declared under the nutrition information panel
	2. Calcium contributes to normal energy metabolism.	
	3. Calcium is necessary for normal nerve and muscle function.	
	4. Calcium is necessary for normal blood coagulation.	
Iodine	1. Iodine is essential for the synthesis of thyroid hormones by the thyroid gland.	<ul style="list-style-type: none"> • ≥ 16.67mcg of iodine in per reference quantity of the food as specified Table 8 in section "Nutrition claims" • The amount of iodine must be declared under the nutrition information panel
	2. Iodine is necessary for normal energy metabolism.	
	3. Iodine contributes to normal cognitive function.	
	4. Iodine contributes to the maintenance of normal skin.	
Iron	1. Iron is an important component of red blood cells which carry oxygen to all parts of the body to help the body's production of energy	<ul style="list-style-type: none"> • ≥ 1.67mg of iron in per reference quantity of the food as specified Table 8 in section "Nutrition claims" • The amount of iron must be declared under the nutrition information panel
	2. Iron is needed to produce haemoglobin, the protein in red blood cells that carries oxygen to tissues	
	3. Iron is needed to produce myoglobin, the protein that helps supply oxygen to muscle	

Minerals		
Nutrient	Claim	Criteria
	4. Iron contributes to normal cognitive function / development	
	5. Iron contributes to normal energy production	
	6. Iron contributes to the reduction of tiredness and fatigue	
	7. Iron is necessary for normal immune system function	
	8. Iron is necessary for normal cell division	
Iron - <i>claims only for food for children up to 6 years of age</i>	9. Iron support the child's natural defenses for children up to 6 years of age	<ul style="list-style-type: none"> • Food must be labelled clearly for this age group • The amount of iron must be declared under the nutrition information panel
Phosphorus	1. Phosphorus contributes to bone development	<ul style="list-style-type: none"> • ≥ 133.33mg of phosphorus in per reference quantity of the food as specified Table 8 in section "Nutrition claims" • The amount of phosphorus must be declared under the nutrition information panel
	2. Phosphorus contributes to normal energy metabolism	
	3. Phosphorus contributes to the maintenance of normal teeth	
Magnesium	1. Magnesium helps in the absorption and retention of calcium	<ul style="list-style-type: none"> • ≥ 46.5mg of magnesium in per 100g of solid food, or ≥ 23.25mg of magnesium in per 100ml of liquid food • The amount of magnesium must be declared under the nutrition information panel
	2. Magnesium contributes to energy metabolism and the maintenance of bone and teeth	
	3. Magnesium is necessary for normal nerve and muscle function	

Minerals		
Nutrient	Claim	Criteria
	<p>4. Magnesium is necessary for normal electrolyte balance</p> <p>5. Magnesium contributes to a reduction of tiredness and fatigue</p>	
Zinc	<p>1. Zinc is essential for growth</p> <p>2. Zinc contributes to normal metabolism of fatty acids</p> <p>3. Zinc contributes to the maintenance of normal bones</p> <p>4. Zinc contributes to the maintenance of normal hair</p> <p>5. Zinc contributes to the maintenance of normal nails</p> <p>6. Zinc contributes to the maintenance of normal vision</p> <p>7. Zinc contributes to normal cognitive function</p> <p>8. Zinc contributes to the normal macronutrient metabolism</p> <p>9. Zinc contributes to the normal carbohydrate metabolism</p> <p>10. Zinc contributes to the normal protein synthesis</p> <p>11. Zinc contributes to the normal metabolism of Vitamin A</p>	<ul style="list-style-type: none"> • ≥ 1.65mg of zinc in per 100g of solid food, or ≥ 0.83mg of zinc in per 100ml of liquid food • The amount of zinc must be declared under the nutrition information panel

Minerals		
Nutrient	Claim	Criteria
	12. Zinc is necessary for cell division	
	13. Zinc is necessary for normal immune system function	
Zinc - <i>claims only for food for children up to 6 years of age</i>	14. Zinc helps in physical development for children up to 6 years of age	<ul style="list-style-type: none"> • Food must be labelled clearly for this age group • The amount of zinc must be declared under the nutrition information panel
	15. Zinc support the child's natural defenses for children up to 6 years of age	
Selenium	1. Selenium contributes to the maintenance of normal hair	<ul style="list-style-type: none"> • ≥ 9mcg of selenium in per 100g of food, or ≥ 4.5mcg selenium in per 100ml of food • The amount of selenium must be declared under the nutrition information panel
	2. Selenium contributes to the maintenance of normal nails	
	3. Selenium contributes to the maintenance of the normal function of the immune system	
	4. Selenium contributes to the protection of cells from oxidative stress	
Potassium	1. Potassium contributes to normal muscle function	<ul style="list-style-type: none"> • ≥ 525mg of potassium in per 100g of food, or ≥ 263mg potassium in per 100ml of food • The amount of potassium must be declared under the nutrition information panel
	2. Potassium contributes to normal functioning of the nervous system	
Copper	1. Copper contributes to normal energy production	<ul style="list-style-type: none"> • ≥ 135mcg of copper in per 100g of food, or ≥ 67.5mcg copper in per 100ml of food

Minerals		
Nutrient	Claim	Criteria
	2. Copper contributes to normal functioning of the nervous system	<ul style="list-style-type: none"> • The amount of copper must be declared under the nutrition information panel
	3. Copper contributes to the normal functioning of the immune system	
	4. Copper contributes to the normal hair pigment	
	5. Copper contributes to normal skin pigmentation	

List of acceptable other function claims

Other nutrients / food constituents		
Nutrients / Food constituents	Claims	Criteria
Chromium	1. Chromium contributes to normal macronutrient metabolism	<ul style="list-style-type: none"> • $\geq 6\text{mcg}$ in per 100g or 100ml of food • The amount of chromium must be declared under the nutrition information panel
Collagen	1. Collagen is a protein in connective tissues found in skin, bones and muscles	<ul style="list-style-type: none"> • The addition of collagen has to be disclosed under the statement of ingredients
Docosahexaenoic acid (DHA) and Arachidonic acid (ARA) – <i>claim only for food for children up to 3 years of age</i>	1. DHA and ARA are important building blocks for development of the brain and eyes for children up to 3 years of age.	<ul style="list-style-type: none"> • Food must be labelled clearly for this age group • The amounts of DHA and ARA must be declared under the nutrition information panel
Nucleotides - <i>claim only for food for children up to 6 years of age</i>	1. Nucleotides are essential to normal cell function and replication, which are important for the overall growth and development of children up to 6 years of age	<ul style="list-style-type: none"> • Food must be labelled clearly for this age group • The amounts of nucleotides must be declared under the nutrition information panel
Taurine - <i>claim only for food for children up to 6 years of age</i>	1. Taurine helps to support overall mental and physical development for children up to 6 years of age	<ul style="list-style-type: none"> • Food must be labelled clearly for this age group • The amount of taurine must be declared under the nutrition information panel
Inulin	1. Inulin helps in calcium absorption	<ul style="list-style-type: none"> • $\geq 133.33\text{mg}$ of calcium in per reference quantity of the food as specified Table 8 in section “Nutrition claims” • The amount of calcium must be declared under the nutrition information panel • The amount of inulin present in each serving or other equivalents of the product must be declared on the product label • Food manufacturer/importer

		to ensure that the amount and combinations of shorter and longer chain inulin present in the product can bring about the claimed effect.
	2. Inulin helps support growth or beneficial bacteria/good intestinal flora in gut	<ul style="list-style-type: none"> Food manufacturer/importer to ensure that the amount of inulin present in the product can bring about the claimed effect.
	3. Inulin helps increase intestinal bifidobacteria and helps maintain a good intestinal environment	
Oligofructose (Fructo-oligosaccharides)	1. Oligofructose stimulates the bifidobacteria, resulting in a significant increase of the beneficial bifidobacteria in the intestinal tract. At the same time, the presence of less desirable bacteria is significantly reduced	<ul style="list-style-type: none"> Food manufacturer/importer to ensure that the amount of the oligofructose present in the product can bring about the claimed effect.
Prebiotics	1. Prebiotic promotes the growth of good <i>Bifidus</i> bacteria to help maintain a healthy digestive system	<ul style="list-style-type: none"> The exact identity of the prebiotic and must be declared on the product label Food manufacturer/importer to ensure that the amount of prebiotic present in the product can bring about the claimed effect.
Prebiotic blend of Galacto-oligosaccharides and long chain Fructo-oligosaccharide	1. Prebiotic blend (galacto-oligosaccharides and long chain fructo-oligosaccharides) support the child's natural defenses for children up to 6 years of age	<ul style="list-style-type: none"> The combination of Galacto-oligosaccharides and long chain Fructo-oligosaccharide present in the product must be in ratio of 9:1
Probiotics	1. Probiotics to help maintain a healthy digestive system	<ul style="list-style-type: none"> The exact specie of the probiotic present in the

	2. Probiotics helps in digestion	<p>product must be declared on the product label</p> <ul style="list-style-type: none"> • Food manufacturer/importer to ensure that the viable count of the probiotic present in the product can bring about the claimed effect.
	3. Probiotics helps to maintain a desirable balance of beneficial bacterial in the digestive system	
	4. Probiotics helps to suppress/fight against harmful bacteria in the digestive system, thereby helping to maintain a healthy digestive system	
Plant sterols/stanols	1. Plant sterols/stanols have been shown to lower/reduce blood cholesterol. High blood cholesterol is a risk factor in the development of coronary heart disease	<ul style="list-style-type: none"> • Phytosterols, phytosterol esters, phytostanols or phytostanol esters may only be added to — <ul style="list-style-type: none"> (i) any edible vegetable fat or oil containing not more than 20 g of saturated fat per 100 g of total fat; (ii) any margarine or fat spread containing not more than 27 g of saturated fat per 100 g of total fat; or (iii) any other food containing not more than 3 g of total fat per 100 g or 1.5 g of total fat per 100 ml. • The following mandatory information must be declared on the product label: <ul style="list-style-type: none"> (i) The product is a special purpose food intended for people who want to lower their blood cholesterol level; (ii) The product may not be nutritionally appropriate for pregnant and breast-feeding women and children under the age of 5 years; (iii) The product should be used as part of a balanced and varied diet; (iv) Consumption in a day of

		<p>a total of more than 3g of phytosterols and/or phytostanols does not provide any additional benefit in lowering blood cholesterol levels;</p> <p>(v) Consumption in a day of a total of at least 2g of phytosterols and/or phytostanols has been shown to lower blood cholesterol levels; and</p> <p>(vi) A statement suggesting the amount of the food (in g or ml) to be consumed each time (referred to as a serving), and a statement of the total amount of phytosterols and phytostanols that each serving contains.</p>
Barley or Oat beta-glucan	<p>1. Barley beta-glucans / Oat beta-glucans have been shown to lower/reduce blood cholesterol. High blood cholesterol is a risk factor in the development of coronary heart disease.</p>	<ul style="list-style-type: none"> • The cholesterol, saturated fatty acids and trans fatty acids present in the food must be within the following levels: <ul style="list-style-type: none"> (i) in the case of solid food <ul style="list-style-type: none"> — a. not more than 20 mg of cholesterol per 100 g; b. not more than 1.5 g of saturated fatty acids and c. trans fatty acids per 100 g; and d. not more than 10% of kilocalories from e. saturated fatty acids and trans fatty acids; or (ii) in the case of liquid food <ul style="list-style-type: none"> — a. not more than 10 mg of cholesterol per 100 ml; b. not more than 0.75 g of saturated fatty

		<p>acids and</p> <ul style="list-style-type: none"> c. trans fatty acids per 100 ml; and d. not more than 10% of kilocalories from e. saturated fatty acids and trans fatty acids. <ul style="list-style-type: none"> • The following mandatory information must be declared on the product label: <ul style="list-style-type: none"> (i) a statement or statements to the like effect that consumption of at least 3 g of barley beta-glucans or oat beta-glucans (as the case may be) in a day has been shown to lower blood cholesterol levels; and (ii) the amounts of barley beta-glucan or oat beta-glucans (as the case may be), cholesterol, saturated fatty acids and trans fatty acids, present in the food under the nutrition information panel.
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(ii) Nutrient specific diet-related health claims

The nutrient specific diet-related health claims listed in **Table 9** (see “*reduction of disease risk claims*” defined in [Appendix III](#)) for prepacked foods may be used if (1) they meet the criteria stipulated under the Fourteenth Schedule; and (2) they have been approved by the Health Promotion Board (HPB) to carry the Healthier Choice Symbol (HCS).

For applications of HCS symbol, please contact Health Promotion Board at email: HPB_HCSadmin@hpb.gov.sg

Table 9: List of nutrient specific diet-related health claims

Claims	Criteria
<p>A healthy diet with adequate calcium and vitamin D, with regular exercise, helps to achieve strong bones and may reduce the risk of osteoporosis. (Name of food) is a good source of/high in/enriched in/fortified with calcium.</p>	<ol style="list-style-type: none"> 1. At least 50% of calcium RDA, which is taken as 800mg and 2. Low in fat ($\leq 3g$ fat per 100g or $\leq 1.5g$ fat per 100ml) <u>or</u> Fat free ($\leq 0.15g$ fat per 100g or 100ml)
<p>A healthy diet low in sodium may reduce the risk of high blood pressure, a risk factor for stroke and heart disease. (Name of food) is sodium free/low in/very low in/reduced in sodium.</p>	<ol style="list-style-type: none"> 1. No added salt <u>or</u> Salt/ sodium free ($\leq 5mg$ sodium per 100g) <u>or</u> Very low in salt/ sodium ($\leq 40mg$ per 100g) <u>or</u> Low in sodium ($\leq 120mg$ per 100g) <u>or</u> Reduced sodium (if sodium content per reference quantity is $\leq 15\%$ of sodium RDA of 2000mg)

A healthy diet low in saturated fat and trans fat, may reduce the risk of heart disease. (*Name of food*) is free of/ low in saturated fats, trans fats.

1. Low in saturated fat ($\leq 1.5\text{g}$ saturated fat per 100g, and $\leq 10\%$ of kilocalories from saturated fat) or Free of saturated fat ($\leq 0.5\text{g}$ saturated fat per 100g, and $\leq 1\%$ of the total fat is trans fat) and
2. Free of trans fat ($< 0.5\text{g}$ per 100g) and
3. Low in sugar ($\leq 5\text{g}$ per 100g or $\leq 2.5\text{g}$ per 100ml) or Sugar free ($\leq 0.5\text{g}$ per 100g) or Unsweetened or No added sugar; and
4. Cholesterol at $\leq 100\text{mg}$ per 100g and
5. Its reference quantity should not exceed 25% of sodium RDA, which is taken as 2000mg

A healthy diet rich in whole grains ⁷, fruits and vegetables that contain dietary fibre, may reduce the risk of

1. A product from these food groups - whole grains, fruit, vegetables or fibre fortified

⁷ Under the Food Regulations, "wholegrain" is defined as "the intact grain or the dehulled, ground, milled, cracked or flaked grain where the constituents (endosperm, germ and bran) are present in such proportions that represent the typical ratio of those constituents occurring in the whole cereal, and includes wholemeal." Food products are not allowed to be labelled as "wholegrain" unless they fall within, or are made from ingredients that fall within the definition of "wholegrain"; and the term "wholegrain" is qualified immediately by words indicating the percentage of wholegrain ingredients used.

heart disease. (Name of food) is low/free of fat and high in dietary fibre.

foods; and

2. Low in fat: $\leq 3\text{g}$ fat per 100g or $\leq 1.5\text{g}$ fat per 100ml, or Fat free: $\leq 0.15\text{g}$ fat per 100g or 100ml; and
3. High in dietary fibre: $\geq 3\text{g}$ per 100 kcal or $\geq 6\text{g}$ per 100g or 100ml; and
4. With at least 25% of the dietary fibre comprising soluble fibre.

A healthy diet rich in fibre containing foods such as whole grains, fruits and vegetables may reduce the risk of some types of cancers. (*Name of food*) is free/ low in fat and high in dietary fibre.

1. A product from these food groups - whole grains, fruit, vegetables or fibre fortified foods; and
 2. Low in fat ($\leq 3\text{g}$ fat per 100g or $\leq 1.5\text{g}$ fat per 100mL), or Fat free ($\leq 0.15\text{g}$ fat per 100g or 100mL); and
 3. High in dietary fibre ($\geq 3\text{g}$ per 100kcal or $\geq 6\text{g}$ per 100g); and
 4. Reference quantity of the food product should not contain sodium in an amount exceeding 25% of sodium RDA, which is taken as 2000mg.
-

(F) Application for new health claims

The application form can be downloaded from the following SFA website:

- <https://www.sfa.gov.sg/docs/default-source/e-service/food/applicationforuseofnewhealthclaimsforfoodintendedforsaleinsingapore-v1-0>

Applications for use of new health claims (*except disease risk reduction claims*) should include the following information:

- (i) name and address of the applicant;
- (ii) identity of the nutrient, food constituent, food or food category, in respect of which the health claim is to be made and its characteristics;
- (iii) a copy of independent peer-reviewed reports of human intervention studies (*at least 5 but not more than 10, and preferably published in the last 10 years*), which have been carried out regarding the health claim;
- (iv) where available, the official statements by recognised expert scientific bodies (*for example, World Health Organisation and food authorities of major developed countries*) that have been verified and validated over time regarding the health claim to be made;
- (v) a proposal for the wording of the health claim for which the application is intended for, and the specific conditions for use;

- (vi) where appropriate, an indication of the information which should be regarded as proprietary accompanied by verifiable justification; and
- (vii) a summary of the application.

(G) Methods of Analysis

It is the responsibility of food business operators to ensure the accuracy of the nutrition information declared in their product labels. Importers and manufacturers should engage a suitable testing laboratory to verify the nutrient content of their products. A list of Singapore Accreditation Council-Singapore Laboratory Accreditation Scheme (SACSINGLAS) accredited laboratories can be found at the following website:

<https://www.sac-accreditation.gov.sg/>

The methods of analysis used should be those published in the most recent versions of the "Official Methods of Analysis of AOAC International". Other collaboratively studied methods such as those published by the International Organisation for Standardisation (ISO) and the Nordic Committee on Food Analysis (NMKL) are also acceptable. In house or journal methods with adequate method validation data may be considered if they are validated for the food matrix being analysed.

From time to time, SFA conducts laboratory testing to verify the accuracy of nutrition information declared in food labels. The methods of analysis currently used are those published in the most recent versions of the "Official Methods of Analysis of AOAC International". New methods may be adopted as and when improvements in methodology are available.

(H) Other claims

Other claims are those not related to nutrition or health claims, and include “organic”, “gluten-free” and “Raised without the use of antibiotics”.

(a) Organic

Products that are specified as organically produced, must be accompanied by a certificate to substantiate that the product is certified as organic under an inspection and certification system that complies with section 6.3 of the Codex Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods, GL 32-1999, or its equivalence.

(b) Gluten-free

The current Singapore Food Regulations do not specify the requirements for use of claims suggesting that a food product is

free of gluten (claims are represented by using words like “gluten free”).

To ensure consumers’ protection and a level playing field for the industry, AVA currently adopts the guidelines and standard established by the international food standards setting body, Codex Alimentarius Commission* for the use of such claims.

Products labelled as “gluten free” must meet the *Standard for Foods for Special Dietary Use for Persons Intolerant to Gluten (CODEX CXS 118-1979)* established by the international food standards setting body, Codex Alimentarius Commission.

(c) Raised without the use of antibiotics

Food products labelled as being free from antibiotic and hormones are not allowed. The table below provides guidance on the appropriate use of claims relation to the absence of antibiotics and hormones in food.

Claim	Position	Rationale	Criteria
Claims on absence of hormones			
Hormone free/ Raised without use of hormones	Not allowed	This claim would create the impression that the meat does not contain hormones. This claim would be incorrect and inaccurate as meat, poultry and fish products contain naturally occurring	Not applicable

Claim	Position	Rationale	Criteria
		hormones.	
No growth promotants / stimulants	Not allowed	Hormones and low doses of antibiotics in feed are considered growth stimulants. Some consider most of the ingredients in feed mixes such as grains, vitamins and minerals to stimulate growth. With such a broad and diverse understanding of growth stimulant, this claim could mean the absence of a number of substances and the presence of others, depending on the individual. Currently, there is also no objective criteria to define and evaluate such a claim, its use is therefore not acceptable.	Not applicable
Claims on absence of antibiotics			
Antibiotic free	Not allowed	The claim would create a false uniqueness since food, made with animal raised for food production, for sale in Singapore are not allowed to contain antibiotic residues.	Not applicable
Fed no antibiotics/	Not allowed	Antibiotics could be administered by	Not applicable

Claim	Position	Rationale	Criteria
Not injected with antibiotics		different means (e.g. injection, water, feed or spray), a claim on the absence of antibiotics through specific administration, would mislead consumers.	
Raised without use of antibiotics	May be used on food labels and advertisements provided that the conditions are met.	SFA notes that traders would deliberately source food from farmers that take extra effort to ensure that no antibiotics were administered throughout the lifespan of the animal (i.e. from birth to slaughter), due to market demand. In order to recognise the farmer's effort to differentiate their method of production and to protect consumer's interest, SFA requires food traders to provide documentary proof to substantiate for use of such claim.	The claim must be supported by a valid certification issued from a competent authority recognised to conduct audits with respect the use of the claim, throughout the lifespan* of the animal. *“Lifespan” would include that the animal is not given birth or nursed by mothers administered with antibiotics, as antibiotics would be

Claim	Position	Rationale	Criteria
			passed through mother's bloodstream and milk.

Contacts

Food Regulatory Management Division
Singapore Food Agency
52 Jurong Gateway Road, #13-01,
Singapore 608550

For clarification, please submit online query via the <https://csp.sfa.gov.sg/feedback>.

Food business operators may also approach any of SFA's appointed food labelling consultants for consultation service. Consultancy fees may apply depending on service provided.

About SFA's appointed food labelling consultants

As part of SFA's continuous effort to assist food business operators to comply with the Food Regulations in terms of food labelling and advertising, SFA has collaborated with our local institutes of higher learning (*listed in alphabetical order below*) as SFA's appointed food labelling consultants. Appointed food labelling consultants will provide consultation service* to the food business operators on food labels and advertisements of prepacked food to help them comply with the Food Regulations.

- Nanyang Polytechnic through its School of Chemical and Life Sciences
- Republic Polytechnic through its School of Applied Science
- Singapore Polytechnic through its Food Innovation and Resource Centre (FIRC)
- Temasek Polytechnic through its School of Applied Science

** Consultancy fees may apply depending on service provided*

Name of Institute of Higher Learning	Contact details	List of SFA's appointed food labelling consultants
Nanyang Polytechnic	Dr Gan Heng Hui Email: gan_heng_hui@nyp.edu.sg Telephone: 65501528	1. Dr Gan Heng Hui 2. Ms Tay Mia Eng 3. Ms Lena Ling 4. Ms Seah Lay Hoon
Republic Polytechnic	Mr Eric Kwek Email: eric_kwek@rp.edu.sg Telephone: 66971788	1. Ms Eng Yong Yong 2. Ms Loh Sow Wai 3. Ms Chaitra Jagdish 4. Ms Yvonne Cheng 5. Mr Eric Kwek 6. Mr Samuel Aw
Singapore Polytechnic	Mr Zen Tan Email: zen_tan@sp.edu.sg Telephone: 68704619	1. Ms Carolyn Stephen 2. Ms Chen Ying Jie
Temasek Polytechnic	Ms Johanna Tan Email: TANJO@tp.edu.sg Telephone: 67806202	1. Ms Johanna Tan 2. Ms Saihah Binte Mohamed Salleh

Appendix I: Examples of prohibited claims on food

A “claim” means any message or representation, and includes a pictorial, graphic or symbolic representation.

In general, a claim made to indicate the nature, stability, quantity, strength, purity, composition, weight, origin, age, effects or proportion of food or its ingredients must be truthful and should not create any erroneous impression on the value, merit or safety of the food. Food business operators must be able to substantiate for the claims made.

Unless otherwise specifically permitted, food products must not be labelled, advertised or promoted to have any therapeutic or prophylactic actions, or to prevent, alleviate or cure any disease or condition affecting the human body. Claims on food products should also not imply that health or improved physical condition may be achieved by consuming the food, or that the claim made is interpreted as advice of a medical nature from any person.

Examples of claims that are prohibited for food are tabulated below. The list is not exhaustive and may be revised when new information is available.

Examples of diseases, conditions and disorders to which no reference may be made in claims
<ul style="list-style-type: none">• Circulatory system of the body<ul style="list-style-type: none">○ Hypertension, stroke, cholesterol disorders, reduces cholesterol, regulates platelet aggregation, coagulation defects, arteriosclerosis• Eye, ear, nose<ul style="list-style-type: none">○ Blindness, cataract, deafness, inflammation• Digestive system<ul style="list-style-type: none">○ Periodontitis, ulcers, gastritis, hepatitis, liver cirrhosis, fatty liver, diarrhoea, constipation, inflammation of the intestines/liver/pancreas

- Endocrine system
 - Diabetes, thyroid disorders, hypothyroidism, prostate diseases, thymus disorders, hormonal regulation
- Metabolic system
 - Obesity, weight loss
- Respiratory system
 - Asthma, tuberculosis, bronchitis, sinusitis
- Skin, hair, nails
 - Fungal infection, eczema, ulcers, warts, moles, pigmentation disorders
- Immune system
 - Leprosy, AIDS, allergies, immunisation
- Muscular, connective tissues and skeletal systems
 - Osteoporosis, arthritis, sclerosis, autoimmune diseases, sclerosis, inflammation of joints
- Nervous system
 - Epilepsy, fits, paralysis, Alzheimer's disease, Parkinsonism, dementia, neuropathies, drug addictions, depression, eating disorders
- Renal system
 - Kidney stones, renal failure, nephritis, urinary tract infection, incontinence, cystitis
- Reproductive system
 - Menstrual disorders, sexual dysfunction, manage sexual weakness or sexual excess and conditions like premature ejaculation, erectile dysfunction, infertility, frigidity, impotency, conception, pregnancy
- Others
 - Cancers, infectious diseases

Examples of claims related to health or improved physical condition

- Claims to suggest that the product is a traditional medicine / traditional healing / homeopathic medicine / naturopathic medicine
- Claims to suggest that the product can provide support / improve health and well being
- Claims to suggest that the food can improve immunity
- Claims to suggest that the product can help improve lactation
- Claims to suggest that the food can enhance beauty or is for anti-aging / longevity⁸ (e.g. improve skin condition, prevent, retard, or

⁸ Do note that this is except for the name, "Longevity noodles" which has been traditionally on a specific type of noodles, where consumers would not perceive the term, "longevity" as a claim on the health effects of the product.

reverse physiological changes and degenerative conditions brought about by or associated with aging.)

- Claims to suggest that the food can help prevent / reduce stress
- Claims to suggest that the food can maintain / improve performance
- Claims to suggest that the food can prevent hangover or alleviate effects after alcohol consumption
- Claims to suggest that the food can maintain / enhance intelligence or increase intelligence quotient (IQ), memory
- Claims to suggest that the food can help in height growth, breast or muscle enhancement or enlargement
- Claims to suggest that the food can help in weight loss

Examples of claims made that may be interpreted as advice of a medical nature from any person

- Claims to suggest that the product is recommended by doctors
- Testimonials and endorsements from healthcare professionals

Other examples on misleading claims

- Claims that cannot be substantiated
- Unauthorised use of SFA logo
- Claims that arouse fear in the minds of the public or exploit public's superstition
- Claims to suggest that a specific ingredient / additive that is allowed for use in food for sale in Singapore is unsafe
- Use of scientific data (e.g. graphs on health effects) that cannot be verified / validated by consumers or truncated / exaggerated to imply greater validity than what is being concluded, including claims like "clinically proven" in relation to the health effects claimed.
- Claims to suggest that the food can be used for treatment, alleviation or curing of conditions affecting the body, when not consumed orally (e.g. topical use)
- Claims to discriminate use of mainstream medications and to encourage or suggest that the food can replace mainstream medical regime

Food businesses are encouraged to refer to the guiding principles in the Singapore Code of Advertising Practice administered by the Advertising Standards Authority of Singapore, an advisory Council under CASE, on ethics in advertising.

Appendix II: Guidelines on use of signs with implied claims on food labels and advertisements

1. Scope

The following guidance is intended to help industry on the interpretation of the Singapore's Sale of Food Act that no person shall sell any food which is labelled or advertised in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its value, merit or safety.

- 1.1 These advisory guidelines relate to the use of signs on food labels and advertisements with implied claims. These claims include:
 - (a) claims on the absence, presence or addition of specific food ingredients / constituents or a blend of food ingredients / constituents
 - (b) nutrition claims
 - (c) health claims
 - (d) multiple claims
- 1.2 These guidelines are not applicable to signs used on non-food products and signs without implied claims as listed in 1.1.
- 1.3 If it is uncertain whether a sign implies a claim, companies are advised to follow these Guidelines. Companies may also refer to these guidelines when developing signs for use on food labels and advertisements, before registering the sign as a Trade Mark with the relevant authority.

2. Definition

- 2.1 "Sign" includes:
 - (a) any letter, word, statement, name, numeral, brand, shape, colour, picture, mark, trade mark or any of the combinations of the elements;

- (b) words in any languages, singly or with affix. For instance, “proBone” may suggest promotion of bone health;
 - (c) acronyms and/ or “sounds-like”. For example, “e-mune” sounds similar to “immune”, “ez” sounds similar to “easy”; “osteo” and “intelli” are possible acronyms for “osteoporosis” and “intelligence” respectively;
 - (d) pictorial illustrations, which includes but not limited to human anatomy and medical equipment, implying the prevention, alleviation, or curing of any disease and conditions affecting the body, unless otherwise permitted by the Food Regulations; and
 - (e) any combination of the above.
- 2.2 “Nutrition claims” means any representation which states, suggests or implies that a food has particular nutritional properties including but not limited to the energy value and to the content of protein, fat and carbohydrates, as well as the content of vitamins and minerals.
- 2.3 “Health claims” means any representation that states, suggests or implies that a relationship exists between a food ingredient or a constituent or a nutrient and health. Only approved health claims listed under the following references can be used on food sold in Singapore.
- 2.4 “Multiple claims” means any representation that states, suggests or implies a combination of claims (a), (b) and (c) under paragraph 1.1 above.

3. Requirements for use of signs with implied claims on food labels and advertisements

- 3.1 Use of signs on food labels and advertisements should meet all the criteria and the requirements as described in **Table 10**.
- 3.2 The qualifying statement need not be repeated if the signs appear more than once on a same food label and print advertisement.

4. Signs that should not be used

The following are examples of signs that should not be used:

- (a) signs stating any food will provide an adequate source of all essential nutrients;
- (b) signs implying a balanced diet or ordinary foods cannot supply adequate amounts of all nutrients;
- (c) signs with nutrition and health claims that cannot be substantiated and are not listed as one of the permitted health claims in the Food Regulations or “A Guide to Food Labelling and Advertisements”;
- (d) signs claiming the suitability of a food for prevention, alleviation, treatment or cure of a disease, disorder, or particular physiological function, unless specifically permitted by the Food Regulations. Thus, signs of single word describing specific organs and disease conditions should be avoided e.g. “CardiaCure”, “ControlDiabetes”;
- (e) signs with implied claims that are used as product brand names, which could be misinterpreted as a product specific claims; and
- (f) signs that would cast doubt on the safety of other foods or imply that a food is safer than other similar food, for example “Safest choice” / “Say no to harmful {*here inserts substances allowed under for use in food in Singapore*}”.

Table 10: Summary of the criteria and labelling requirements for use of signs with implied claims on food labels and advertisements.

Labelling Requirements / Criteria	Types of Implied Claims		
	(a) Absence, presence or addition of specific food ingredient / constituent or a blend of food ingredient / constituent e.g. <i>“Pre+Pro Bio”</i>	(b) Nutrition claims e.g. <i>“Calci-Vita Plus Formula”</i>	(c) Health claims e.g. <i>KiD Bone™</i>
(1) Declare qualifying statement on both food label and print advertisement	Statement to indicate / specify the absence, presence or addition of the ingredients or the blend of ingredients eg, <i>“Pre+Pro Bio is an unique blend of the prebiotic inulin, and the probiotic Lactobacillus acidophilus.”</i>	Statement to indicate / specify the nutrition claim eg, <i>“Calci-Plus Formula has calcium and vitamin D...”</i>	Statement to indicate / specify the approved health claims, attributing to the specific ingredient(s)/nutrient(s). eg, <i>“KiD Bone™ contains vitamin K and vitamin D which work synergistically on bone metabolism to build strong bones.”</i>

<p>(2) Declare the ingredients / nutrients added under the statement of ingredients on food labels</p>	<p>Declare the specific ingredients or the blend of ingredients (if added)</p>	<p>Declare the form of added nutrients (if added)</p>	<p>Declare the specific ingredient(s) or added nutrient(s) that contribute to the approved health claims</p>
<p>(3) Declare nutrient content under the Nutrition information panel on food label</p>	<p>-</p>	<p>Declare the nutrient content</p>	<p>Declare the content of nutrients contributing to the health claims</p>
<p>(4) Meet the minimum nutrient / food constituent requirement</p>	<p>-</p>	<p>Meet the criteria stipulated under: i) Food Regulations (for vitamins, minerals, energy and protein) ii) Handbook on Nutrition Labelling (Singapore) – for other nutrient content claims</p>	<p>Meet the criteria stipulated under: i) Food Regulations (for vitamins, minerals, energy and protein) ii) Handbook on Nutrition Labelling (Singapore) – for other nutrient content claims not specified under the Food Regulations iii) Guide to Food Labelling and Advertisement - for health claims on food ingredient / constituent</p>

Appendix III: Types of health claims as defined under the “Codex Guidelines for Use of Nutrition and Health Claims”

Under the “Codex Guidelines for Use of Nutrition and Health Claims”, **health claim** means any representation that states, suggests, or implies that a relationship exists between a food or a constituent of that food and health. Health claims include the following:

- (a) **Reduction of disease risk claims** refer to claims relating the consumption of a food or food constituent, in the context of the total diet, to the reduced risk of developing a disease or health-related condition.

Examples: “A healthful diet low in nutrient or substance A may reduce the risk of disease D. Food X is low in nutrient or substance A.”

“A healthful diet rich in nutrient or substance A may reduce the risk of disease D. Food X is high in nutrient or substance A.”

Food⁹ or food constituent refers to energy, nutrients, related substances, ingredients, and any other feature of a food, a whole food, or a category of foods on which the health claim is based. The category of food is included in the definition because the category itself may be assigned a common property of some of the individual foods making it up.

- (b) **Nutrient function claims** refer to nutrition claims that describe the physiological role of the nutrient in growth, development and normal functions of the body.

⁹ Foods include special purpose foods; foods fortified with nutrients such as protein, carbohydrate, dietary fibre, fatty acids, amino acids, vitamins and minerals: and foods added with approved herbal ingredients.

Example: “Nutrient A (naming a physiological role of nutrient A in the body in the maintenance of health and promotion of normal growth and development). Food X is a source of/ high in nutrient A.”

- (c) **Other function claims** refer to claims concerning specific beneficial effects of the consumption of foods or their constituents, in the context of the total diet on normal functions or biological activities of the body and relating to a positive contribution to health or to the improvement of a function or to modifying or preserving health.

Example: “Substance A (*naming the effect of substance A on improving or modifying a physiological function or biological activity associated with health*). Food Y contains x grams of substance A.”

Appendix IV: Checklist for food labels and advertisements

This checklist serves to provide a step-by-step guide to assist food business operators to self-check and ensure that their food labels and advertisements comply with the requirements of the Food Regulations before sale/advertising.

It is the responsibility of the food business operators to ensure that your food products comply with the safety and specification standards, as well as the labelling requirements stipulated under Food Regulations. They are also required to ensure that the advertisements used for their food products do not carry claims prohibited under regulations 9 and 12 of the Food Regulations.

Please note that this checklist does not constitute a certification or an approval from the SFA. Food business operators are advised to refer to the Sale of Food Act and the Food Regulations for the actual legal text.

How to use the checklist

This checklist comprises four sections.

1. Go through step 1 to ensure that the product you intend to import/manufacture for sale in Singapore is a food product, which is defined under the Sale of Food Act.
2. If so, proceed to step 2 to check whether your food product complies with the general labelling requirements of the Food Regulations.
3. Proceed to step 3 to check if your advertising materials and food labels comply with the criteria for use of claims.
4. Move on to step 4 to check if there are additional labelling requirements applicable to your food product.

Step 1: Definition for food

The definition for food under the Sale of Food includes:

- (a) unprocessed and raw fruits and vegetables that are intended for human consumption;
- (b) seeds, plants, or plant material intended for human consumption, including seeds that are intended to be sprouted and consumed as sprouts, but not other seeds, plants, or plant material intended for planting;
- (c) drinking water;
- (d) any thing that is or is intended to be mixed with or added to any food or drink;
- (e) milk and dairy products;
- (f) meat and meat products;
- (g) fish and fish products; and
- (h) eggs.

Food does not include:

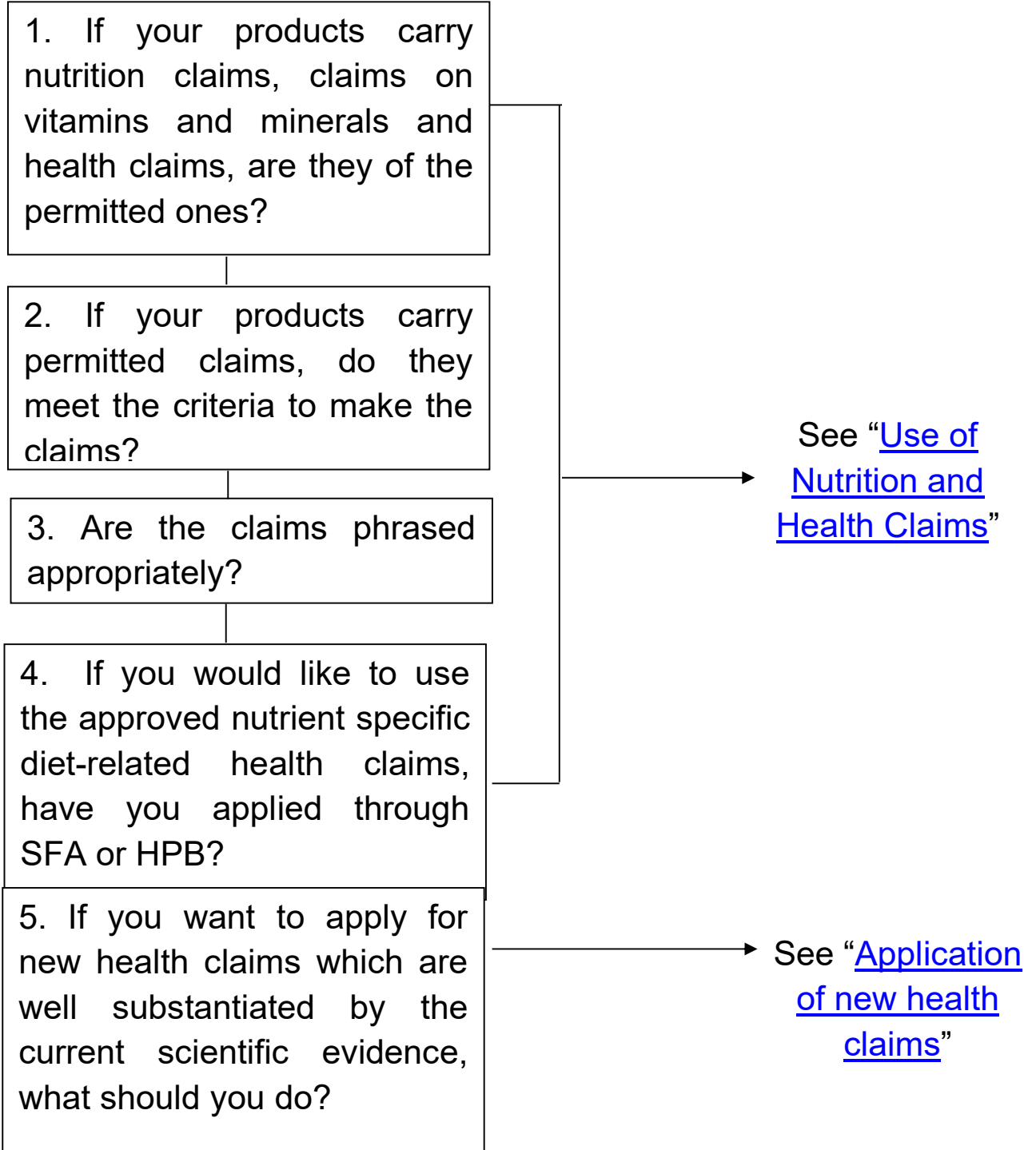
- (a) any health product within the meaning of the Health Products Act (Cap. 122D);
- (b) any substance that is a medicinal product within the meaning of the Medicines Act (Cap. 176);
- (c) any controlled drug, controlled material or controlled substance within the meaning of the Misuse of Drugs Act (Cap. 185);
- (d) any poison within the meaning of the Poisons Act (Cap. 234);
- (e) any cosmetics;
- (f) any tobacco product or tobacco substitute within the meaning of the Tobacco (Control of Advertisements and Sale) Act (Cap. 309);
- (g) any package (except edible packaging);
- (h) any fodder or feeding stuffs for animals

Step 2: General labelling requirements

For those items marked “No” in this section, please revise your label accordingly.

No.	General Labelling Requirements	Yes	No
1.	Product Name: An acceptable common name or description which is sufficient to indicate the true nature of the product.		
2(i).	Ingredients List: All ingredients and additives used in the product are listed in descending order by proportion of weight.		
2(ii).	Allergen Labelling: This includes the declaration of foods and ingredients (including components of compound ingredients) that are known to cause hypersensitivity.		
3(i).	Quantity: The net quantity of the food in the package expressed in terms of (i) volumetric measure (for liquid food products) (ii) net weight (for solid food products) or (iii) either volumetric or weight measure for semi-solid or viscous products.		
3(ii)	Drained weight: This is the weight of the food minus the liquid medium; and applies only to foods packed in liquid medium.		
4.	Imported Food: Name of the country of origin of the product. Name and address of your company as the importer, distributor or agent in Singapore.		
5.	Locally manufactured food: Name and address of the manufacturer, producer, packer or local vendor.		
6.	Are items (1) to (5) printed in English?		
7.	Are items (1) to (3) printed in letters not less than 1.5mm in height?		

Step 3: Use of claims on food labels and advertisements



Step 4: Additional labelling requirements

