

# **A Guide to Food Labelling and Advertisements**

**A publication of the  
Singapore Food Agency (SFA)**



**First published Feb 2010.**

**Amendments Oct 2011, Oct 2013, Jul 2014, Jan 2015, Jul 2015, Mar 2016, Aug 2018, Feb 2019, Apr 2019, Sep 2019, Jan 2020, Apr 2020, Sep 2020, Nov 2020, Sep 2021, Aug 2023, Nov 2024**

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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 Commission<sup>1</sup> (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.

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<sup>1</sup> *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.

- |     |  |
|-----|--|
| (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 terms<sup>2</sup> 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.

The use of the synthetic colouring matter, tartrazine must be disclosed under the statement of ingredients as either

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<sup>2</sup> 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.

"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><b>List down all</b> 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><b>Identify the compound ingredients</b> used in the food product, and find out the constituents of the compound ingredients by checking:</p> <ul style="list-style-type: none"><li>• with your suppliers, or</li><li>• the documents provided by suppliers (<i>e.g. product specification sheets</i>).</li></ul> <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 <b>any simplified terms</b> 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 <b>presence of any ingredients or additives that are known to cause hypersensitivity</b> and label their exact identities.</p> <p>For more information, see the section on <i>Foods &amp; 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:

(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

<b>If the food allergen is...</b>	<b>Option 1:</b> <i>Declaration using statement of ingredients</i>	<b>Option 2:</b> <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"> <li><i>Contains: peanut, egg</i></li> </ul>
<p>(ii) <i>an ingredient of a compound ingredient</i></p> <p><i>Example:</i> <i>A cake made of batter containing wheat flour</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 bicarbonate)</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>

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

## 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 isinglass<sup>3</sup> 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.

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<sup>3</sup> *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 medium<sup>4</sup> 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.

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<sup>4</sup> 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**

<b>Description of manufacturing scenario</b>	<b>Manner of declaration</b>
<i>The product is farmed and processed/packed in Singapore.</i>	<ul style="list-style-type: none"><li>• “Farmed and produced in Singapore”</li><li>• “Singapore produce”</li><li>• “Product of Singapore”</li></ul>
<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"><li>• “Product of Singapore”</li><li>• “Made in Singapore”</li></ul>

*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 <b>"31 May 2021"</b> or
4. Yoghurt, low-fat yoghurt, fat-reduced yoghurt, non-fat yoghurt and yoghurt products.	<b>"31 May"</b> .
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	

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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 vegetables<sup>5</sup> 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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<sup>5</sup> 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.

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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.
- 

### **(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.*

<b>Category</b>	<b>Sweetening agents and the maximum permissible level</b>
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.*

<b>Category</b>	<b>Sweetening agents and the maximum permissible level</b>
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 the*

Health Promotion Board's website at [www.hpb.gov.sg](http://www.hpb.gov.sg) 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) 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.

**(iii) Infants' food and infant formula**

Infants' food is any food suitable for infants<sup>6</sup> and includes infant formula formulated for infants from birth to 12 months of age.

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<sup>6</sup> The Food Regulations define “infant” as a person not more than 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 SFA's website at the following links:

- [Guidance document for labelling of infant formula](#)
- [FAQs on labelling requirements for infant formula](#)

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 on special purpose foods, edible fats and oils, and when nutrition claims or permitted health claims are made. Nutrition labelling is under the purview of the Health Promotion Board (HPB). More information can be found on HPB's website at [www.hpb.gov.sg](http://www.hpb.gov.sg).

### **(f) 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*

<b>Food type</b>	<b>Food Regulations</b>
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

**(g) Advisory statements**

Products containing the ingredients/constituents 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. This applies also to the use of signs and symbols on food labels (see Section G: Use of Signs).

### Prohibited claims

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. Please refer to HPB's website at [www.hpb.gov.sg](http://www.hpb.gov.sg) for examples of prohibited health claims.

## **(E) Use of Nutrition Claims and Health Claims**

Nutrition claims are claims that suggest or imply that 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 HPB's "A Handbook on Nutrition Labelling" are complied with.

Health claims 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 nutrient function claims, other function claims and reduction of disease risk claims.

Nutrition and health claims are under the purview of HPB. Please refer to [www.hpb.gov.sg](http://www.hpb.gov.sg) for more information.

## **(F) Other claims**

These are claims other than nutrition or health claims, and include claims such as “organic”, “gluten-free” and “Raised without the use of antibiotics”.

### **(a) Organic**

Products labelled with claims such as “organically produced”, “organic” or similar terms, 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 equivalent.

### **(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. Such claims are usually communicated using words like “gluten free”.

To protect consumers and ensure fairness and transparency for the industry, SFA currently references the standards established by the international food standards setting body, the Codex Alimentarius Commission\* (Codex) 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* (CXS 118-1979) established by Codex.

## **(G) Use of Signs**

A “sign” means any letter, word, statement, name, numeral, brand, shape, colour, picture, mark, trademark, or any of the combinations of the elements.

Signs and symbols are often used on food labels to provide consumers with quick, easy-to-understand information about the food product. However, they may sometimes be used in a manner that is false, misleading or deceptive, or likely to create an erroneous impression regarding the value, merit and safety of the food.

An example would be the use of a logo or a mark on the product label that indicates endorsement or approval by a food safety authority, suggesting that the product is safer than others.

## Contacts

Regulatory Standards and Veterinary Office  
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	Ms Dong Xin Email: <a href="mailto:dong_xin@nyp.edu.sg">dong_xin@nyp.edu.sg</a> Telephone: 65501522	1. Ms Dong Xin 2. Ms Sze Wee Ping
Republic Polytechnic	Mr Eric Kwek Email: <a href="mailto:eric_kwek@rp.edu.sg">eric_kwek@rp.edu.sg</a> 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	Ms. Rena Low Email: <a href="mailto:rena_low@sp.edu.sg">rena_low@sp.edu.sg</a> Telephone: 68707833	1. Ms Carolyn Stephen
Temasek Polytechnic	Ms Johanna Tan Email: <a href="mailto:TANJO@tp.edu.sg">TANJO@tp.edu.sg</a> Telephone: 67806202	1. Ms Johanna Tan 2. Ms Saihah Binte Mohamed Salleh

# Appendix I: 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.

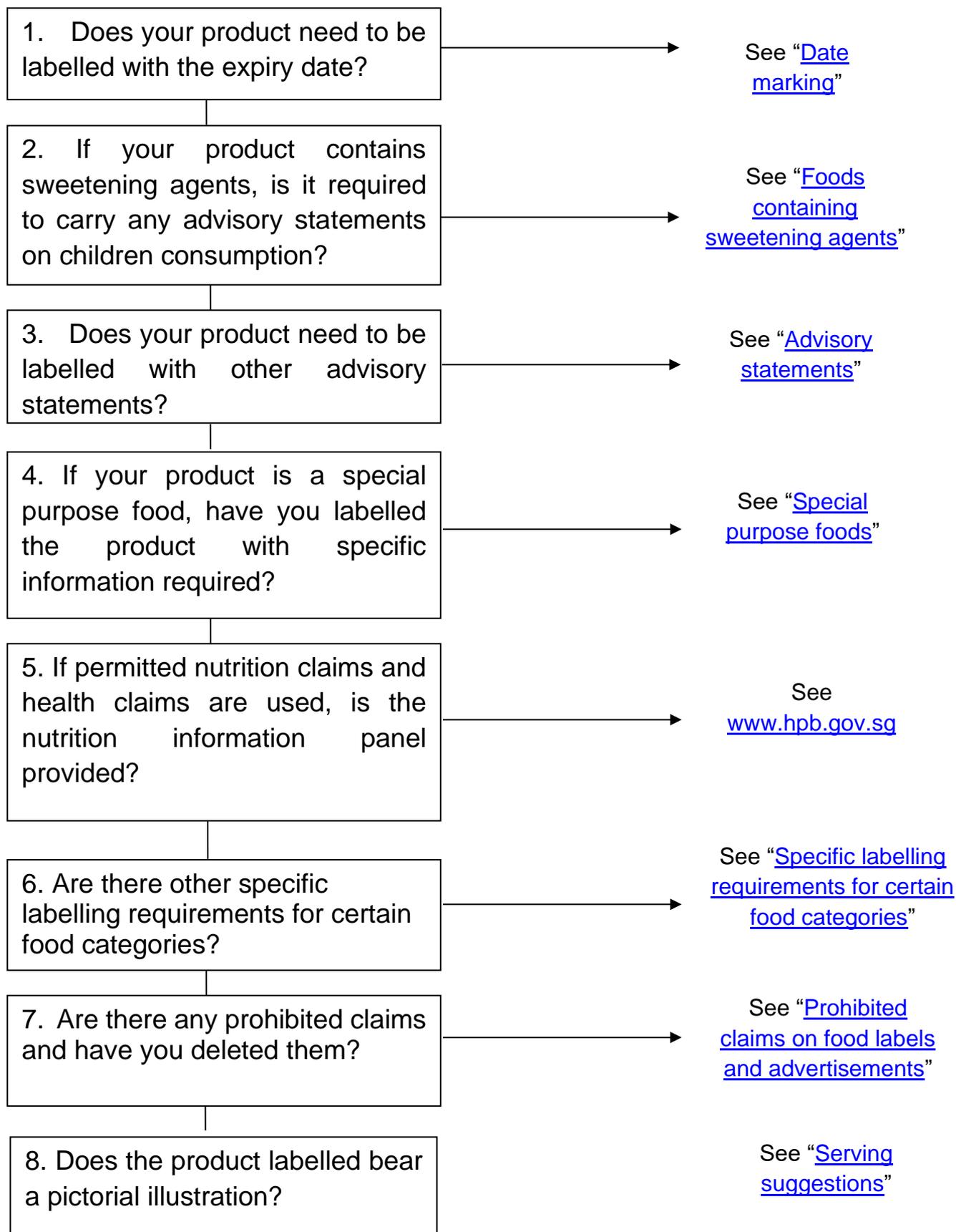
No.	General Labelling Requirements	Yes	No
1.	<b>Product Name:</b> An acceptable common name or description which is sufficient to indicate the true nature of the product.		
2(i).	<b>Ingredients List:</b> All ingredients and additives used in the product are listed in descending order by proportion of weight.		
2(ii).	<b>Allergen Labelling:</b> This includes the declaration of foods and ingredients (including components of compound ingredients) that are known to cause hypersensitivity.		
3(i).	<b>Quantity:</b> 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)	<b>Drained weight:</b> This is the weight of the food minus the liquid medium; and applies only to foods packed in liquid medium.		
4.	<b>Imported Food:</b> Name of the country of origin of the product. Name and address of your company as the importer, distributor or agent in Singapore.		
5.	<b>Locally manufactured food:</b> 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**

Check the Food Regulations for the criteria on the use of claims such as “organic”.

For more information on nutrition and health claims, please visit the Health Promotion Board’s website at [www.hpb.gov.sg](http://www.hpb.gov.sg).

## Step 4: Additional labelling requirements



## **Revision History (14 November 2024)**

### Section C: Additional Labelling Requirements

- 1) Added HPB's website to part (d) of Section C
- 2) Editorial changes to part (iv) of Section C
- 3) Removed information on nutrition information panel in part (e) of Section C
- 4) Removed part (f) of Section C, part (g) of Section C is renamed to part (f)
- 5) Removed Regulation 260 from Table 6 of part (g) of Section C
- 6) Part (h) of Section C is renamed to Part (g)

### Section D: Prohibited Claims on Food Labels and Advertisements

- 7) Added title and HPB's website to describe prohibited claims under the purview of HPB

### Section E: Use of Nutrition Claims and Health Claims

- 8) Removed part (a) header of Section E
- 9) Removed Table 7 and Table 8 as well as the relevant information of Section E
- 10) Removed entire part (b) of Section E

### Section F: Application for New Health Claims

- 11) Removed entire section

### Section G: Methods of Analysis

- 12) Removed entire section

### Section H: Other claims

- 13) Section H is renamed to Section F

### Section I: Use of Signs **[New]**

- 14) Section I is renamed to Section G

### Contacts (Section)

- 15) Updated contact information for Nanyang Polytechnic

### Appendix I: Examples of prohibited claims on food

- 16) Removed entire section

### Appendix II: Guidelines on Use of Signs with Implied Claims on Food Labels and Advertisements

- 17) Removed entire section

### Appendix III: Types of Health Claims as Defined Under the "Codex Guidelines for Use of Nutrition and Health Claims."

- 18) Removed entire section

### Appendix IV: Checklist for Food Labels and Advertisements

- 19) Renamed to Appendix I
- 20) Removed flowchart in "Step 3", replaced with HPB's website
- 21) Replaced "Nutrition labelling" with HPB's website in "Step 4"