



Amendments to Labelling Requirements for Prepacked Food

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Platform:

Date:

Food (Amendment) Regulations 2025

- Amendments to the [Food Regulations](#) on new and revised labelling requirements for **prepacked foods** to incorporate relevant labelling provisions in the following Codex Standards:
 - Codex [General Standard for the Labelling of Prepackaged Foods](#) (CXS 1-1985)
 - Codex [General Guidelines on Claims](#) (CXG 1-1979)
 - Codex [Standard for Foods for Special Dietary Use for Persons Intolerant to Gluten](#) (CXS 118-1979)
- Industry views were sought and incorporated over two rounds of public consultation; concurrently notified the World Trade Organization (WTO):
 - 15 Oct to 20 Nov 2020
 - 28 Sep to 27 Nov 2022

Food (Amendment) Regulations 2025

- Published in e-Gazette on 31 Jan 2025, will come into operation on 30 Jan 2026
- Key changes:
 1. Revisions to general labelling requirements - **Regulation 5 and First Schedule**
 2. Exemptions from certain labelling requirements for prepacked food packed in small units and prepacked fresh fruits and vegetables - **Regulation 6**
 3. Additional types of prohibited claims - **Regulation 9(2)**
 4. New standard for gluten-free and reduced gluten food and associated claims - **Regulation 250B**

Revisions to general labelling requirements

Regulation 5 and First Schedule

1. Heading / title is required for statement of ingredients

- Regulation 5(4)(iii): the list of ingredients must be preceded by a heading or title that indicates that the list is of the ingredients.



Rolled Oats (25.1%), Candied Fruit and Nut (24%) {Candied Cranberry (15%), Almonds (9%)}, Sugar, Oat Flour (10.7%), Edible Vegetable Oil (Palmolein), Rice (4.2%), Whole Wheat (3.9%), Rice Flour (2.7%), Liquid Glucose, Corn Flour (1.8%), Honey, Cereal Extract, Wheat Bran (0.6%), Refined Wheat Flour (Maida) (0.5%), Iodized Salt, Dextrose, Barley Flour (0.1%), Vitamins, Raising Agent (INS 500ii), Minerals, Antioxidant (INS 320)

CONTAINS ADDED FLAVOURS (NATURE IDENTICAL AND ARTIFICIAL CREAM FLAVOUR)
CONTAINS GLUTEN, ALMONDS. MAY CONTAIN TRACES OF SOY AND MILK.



INGREDIENTS: Granola (Whole Rolled Oats, Sugar, Rice Flour, Canola and/or Soybean Oil, Molasses, Sodium Bicarbonate, Soy Lecithin - an Emulsifier, Calcium Carbonate, Salt), Corn Syrup, Semisweet Chocolate Chips (Chocolate Liquor, Sugar, Milk Powder, Soy Lecithin - an Emulsifier, Vanilla Extract), Crisp Rice [Rice Flour, Sugar, Dry Malt Extract (Contains Corn Solids), Salt, Calcium Carbonate], Fructose, Sugar, Canola and/or Soybean Oil, Glycerin, Liquid Invert Sugar, Dried Unsweetened Coconut, Soy Lecithin - an Emulsifier, Honey, Salt, Wheat Flakes (Contain Salt, Malt Extract), Ascorbic Acid, Citric Acid, Rosemary Extract, Natural Flavor.

2. Declaration of list of ingredients

Applies to food consisting of 2 or more ingredients

- Declare the quantity or proportion of each ingredient, OR
- Declare the ingredients in descending order of the proportions **by ingoing weight at the time of manufacture**
 - This means that the ingredient that weighs the most must be listed first and the ingredient which weighs the least must be listed last

Ingredients: Chicken Broth, Rice, Carrots, Cooked White Chicken Meat, Celery, Potatoes, Tomatoes, Modified Food Starch. **Contains less than 1% of:** Corn Protein (hydrolyzed), Water, Salt, Potassium Chloride, Carrot Puree, Onion Powder, Sugar, Tomato Extract, Soy Protein Isolate, Garlic Powder, Sodium Phosphate, Dried Parsley, Calcium Chloride, Spice, Maltodextrin, Citric Acid, Natural Flavor, Egg Yolk, Beta Carotene (color), Flavoring.
CONTAINS SOY AND EGG INGREDIENTS.

3. Added water must be declared

Added water must be declared in the statement of ingredients unless it falls into one or more of the scenarios listed in Regulation 5(4)(iv):

“It is not necessary to state that the food contains water where —

(A) in any food consisting of 2 or more ingredients, one of which is brine, syrup or broth —

(AA) the water forms part of a brine, syrup, broth or similar ingredient; and

(AB) the brine, syrup, broth or similar ingredient is declared in the statement list of ingredients, together with the ingredients of the brine, syrup or broth (other than water);

(B) the water is evaporated in the course of manufacture;

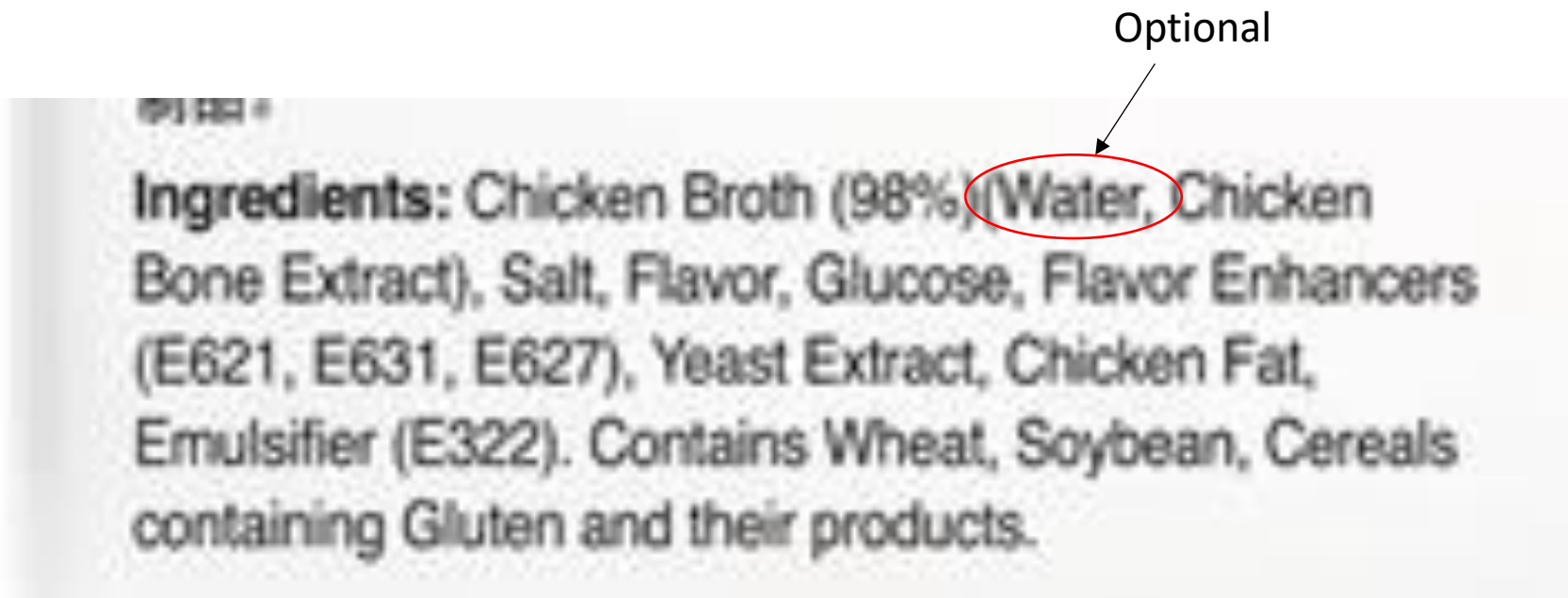
(C) the water makes up less than 5% of the finished product by volume (for liquid food) or by weight (for viscous food); or

(D) the water is used to reconstitute a dehydrated ingredient, where the amount of water added in the process of reconstitution is equal to the amount of water removed in the making of the dehydrated ingredient;”

Where one of the ingredients is brine, syrup or broth

Regulation 5(4)(iv):

It is not necessary to state that the food contains water in a food made of 2 or more ingredients where 1 of the ingredients is brine, syrup or broth and the brine, syrup or broth is declared in the list of ingredients, together with the ingredients of the brine, syrup or broth (other than water)



Where water makes up <5% of the finished product

Regulation 5(4)(iv):

It is not necessary to state that the food contains water if water makes up less than 5% of the finished product by volume (for liquid food) or by weight (for viscous food)



Where the water used to reconstitute a dehydrated ingredient = the water removed in the making of the dehydrated ingredient

Regulation 5(4)(iv):

It is not necessary to state that the food contains water if the water used to reconstitute a dehydrated ingredient is equal to the amount of water removed in the making of the dehydrated ingredient



INGREDIENTS:

Reconstituted Juice [Apple (72%), Orange (17%), White Grape (4.0%), Apricot Purée (2.4%), Peach Purée (1.7%), Pear (1.0%), Mango Purée (0.6%), Passionfruit (0.5%), Lemon (0.5%)], Natural Colour (Carotene), Vitamin C, Food Acid (Citric Acid), Vitamin A, Natural Flavours, Folic Acid.



4. Identification number or mark must be declared

- Identification number or mark that identifies the producing factory and the production lot of the food must be declared (e.g. lot number, batch number, serial number)
- SFA will not dictate the format for declaration as food businesses may have their own ways of identifying a production lot
- Lot identification may take the form of codes or date-marks (e.g. expiry or production dates)
- Whatever the format, the lot identification adopted by food businesses should enable them to identify and trace the implicated lot in the event of a food safety incident or recall.
- Exemptions for prepacked fresh whole fruits and vegetables ([see slide 29](#))



5. Directions on use of the food must be provided

- Directions on the use or handling of the food must be provided, if incorrect use or handling of the food would render the food unsafe or unsuitable



6. Country of origin must be declared

- The country of origin is a mandatory piece of information which must be present on the labels of prepacked food products to facilitate traceability.
- It refers to the place where the handling of the food last took place (for e.g. the last place where the food was packed into its primary packaging).
- Under existing regulations, the country of origin must be declared for imported prepacked food.
- With effect from **30 Jan 2026**, declaration of country of origin is **also required for prepacked food manufactured/produced in Singapore.**

6. Country of origin must be declared

“(iii) the name of the country of origin of the food must be **accompanied by a statement** that the country named is the country of origin of the food or a statement to the like effect”

- SFA does not intend to prescribe the exact wording for the “statement” to indicate the name of the country of origin.
- Phrases such as “Country of origin” / “Product of” / “Produced in” / “Manufactured in”, and other appropriate terms which provide clarity on the context in which the name of the country of origin is declared would be acceptable.
- To qualify for the use of the terms “Product of Singapore” or “Made in Singapore”, the product should have undergone manufacturing processes to change the nature of the food in premises licensed by SFA
- Food businesses that import food in bulk for repacking into retail packs, with no other processes to change the nature of the food may only qualify as the packer of the product.
 - For such products, the country of origin may be declared as “Product of Country A. Packed in Country B” OR “Packed in Country B”.

What is meant by “change the nature of the food”?

- Processes that merely change the form or appearance of the food (e.g. slicing, grating) is not regarded as changing the nature of the food
- Some examples listed below (Source: [Australian Competition & Consumer Commission](#))

Process	Nature of food changed? (Y/N)
Slicing/dicing/grating imported fruits, vegetables, meats and cheeses	N
Forming imported mince meat into patties	
Roasting, grinding and blending imported whole spices to make a curry paste	Y
Roasting a green coffee bean to make coffee for drinking	
Juicing imported fruits and vegetables to make a juice	
Curing and drying imported pork to make bacon	
Dehydrating fresh fruits and vegetables to make dried chips of fruits and vegetables	

7. Declaration of food additives

- Food additives that are carried over into the final food and do not serve a technological function in the final food need not be declared in the statement of ingredients.
 - e.g. A permitted anti-caking agent is added to grated cheese which is used as an ingredient to make muffin. The anti-caking agent need not be declared in the statement of ingredients for the muffin as it does not serve any technological function.
- However, if the food additive is one of the ingredients known to cause hypersensitivity, it **must** always be declared.

8. Declaration of processing aids

- Processing aid means any substance or material that is used to perform a technological function in the treatment or processing of any food that may result in the non-intentional but unavoidable presence of residue or derivative of the substance or material in the finished food product, other than
 - an apparatus or utensil
 - an ingredient consumed on its own; and
 - a food or ingredient known to cause hypersensitivity to individuals
- Processing aids need not be declared in the statement of ingredients.
- Examples include enzymes used in various steps of processing of an ingredient used in the food.

9. Any allergen obtained through use of biotechnology must be declared

- Any allergen listed in Regulation 5(4)(ea)) that is obtained through the use of biotechnology needs to be declared on the product label
- For example, biotechnology is used to produce rice grains, and during the process, a protein from soya bean, which is listed as a food or ingredient known to cause hypersensitivity, was transferred into the rice grain. The presence of soya bean can be declared as follows:

“Contains soya bean”

10. Any allergen carried over from an ingredient into a finished food product must be declared

- If any of the food or ingredient known to cause hypersensitivity is carried over from an ingredient into a finished food product, it must be specified by its exact name, and not by a permitted generic term (see [Slide 23](#) for the permitted generic terms)
- Generic terms must not be used when declaring any of the food or ingredients known to cause hypersensitivity (allergens).
 - For example, peanut oil is a constituent of a salad dressing which is an ingredient of the final food product: prepacked chilled chicken salad.

*For illustration purposes, the ingredients in the **prepacked chilled chicken salad** are: Cooked chicken breast (chicken breast, water, salt), romaine lettuce, shredded carrots, salad dressing (soy sauce (water, soybeans, wheat, salt), vinegar, sugar, **peanut oil**, sesame oil, ginger, garlic, carob gum), sesame seeds*

- The peanut oil is not directly added to the chicken salad but is “carried over” into the chicken salad via the salad dressing which is an ingredient of the chicken salad.
- Peanut oil must be declared as “peanut oil” or “vegetable oil (peanut)” or similar terms in the list of ingredients, and not by the permitted generic term “vegetable oil” alone.

11. First Schedule – revised list of generic terms for ingredient declaration

No.	Substance	Generic Terms
1	Any type of caseinate	Caseinate
2	Any type of cheese or mixture of cheese when forming an ingredient of another food, where the labelling and presentation of the food does not refer to a specific type of cheese	Cheese
3	Pressed, expeller or refined cocoa butter	Cocoa butter
4	Any colouring	Colouring or colouring matter
5	Any crystallised fruit or mixture of crystallised fruits not exceeding 10% of the weight of the food	Crystallised fruit
6	Anhydrous dextrose and dextrose monohydrate	Dextrose or glucose
7	Any of the following gums: Acacia, carob, gellan, ghatti, guar, karaya, tara, tragacanth and xanthan gums	Edible gum
8	Any emulsifier or stabiliser	Emulsifier/stabiliser or emulsifying/stabilising agent

11. First Schedule – revised list of generic terms for ingredient declaration

No.	Substance	Generic Terms
9	Any refined fat, other than pork fat, lard and beef fat	Animal fat or vegetable fat, as applicable
10	Any species of fish when forming an ingredient of another food, where the labelling and presentation of the food does not refer to a specific species of fish	Fish
11	Any flavouring	Flavour or flavouring, qualified by the words “natural”, “nature identical” or “artificial”, or a combination of any of these words, if applicable
12	Any herb, part of a herb or mixture of herbs not exceeding 2% by weight either singly or in combination in the food	Herbs or mixed herbs as applicable
13	Any type of imitation cream	Imitation cream
14	Any milk product containing a minimum of 50% milk protein (mass/mass) in dry matter	Milk protein

11. First Schedule – revised list of generic terms for ingredient declaration

No.	Substance	Generic Terms
15	Any of the following modified starches: Dextrin roasted starch, acid-treated starch, alkaline-treated starch, bleached starch, oxidised starch, enzyme-treated starch, monostarch phosphate, distarch phosphate, phosphated distarch phosphate, acetylated distarch phosphate, starch acetate, acetylated distarch adipate, hydroxypropyl starch, hydroxypropyl distarch phosphate, starch sodium octenyl succinate and acetylated oxidised starch	Modified starch
16	Any type of poultry meat, where the labelling and presentation of the food does not refer to a specific type of poultry meat	Poultry meat
17	Any spice or mixture of spices or spice extracts not exceeding 2% by weight, either singly or in combination in the food	Spice, spices or mixed spices as applicable
18	Any type of starch, other than any chemically modified starch	Starch
19	Sucrose	Sugar
20	Any deodorised edible vegetable oil that is fully hydrogenated or not hydrogenated, when forming an ingredient of any food other than edible fats and oils	Vegetable oil or vegetable fat, qualified by the words “fully hydrogenated” if applicable ²⁵

Exemptions from certain labelling requirements

Regulation 6

1. Food packed in small units

- The following information need not be declared on the label of a food packed in a small unit where the side of the packaging with the largest surface is less than 10cm^2 :
 - Statement of ingredients
 - Declaration of the colouring matter, tartrazine, if added
 - Lot identification number or mark
 - Presence of foods and ingredients known to cause hypersensitivity
 - Presence of allergens transferred into a food which is obtained through biotechnology
 - The following words (or words of similar effect): “Phenylketonurics: contains Phenylalanine” for food containing aspartame
 - Directions on the use or handling of the food
- However, the above information must be provided to consumers through a physical document or a website or other electronic record.

1. Food packed in small units

Information that must be on the label

- a) Name or description of the food
- b) Net quantity of the food
- c) Name and address of the local food business operator
- d) Name of the country of origin



Information that must be provided via physical document (e.g. leaflet) or website or other electronic record (such as scanning of QR codes)

- Statement of ingredients
- Declaration of the colouring matter, tartrazine, if added
- Lot identification number or mark
- Presence of foods and ingredients known to cause hypersensitivity
- Presence of allergens transferred into a food which is obtained through biotechnology
- The following words (or words of similar effect) :
“Phenylketonurics: contains Phenylalanine” for food containing aspartame
- Directions on the use or handling of the food

2. Exemption from declaration of lot identification for prepacked fresh whole fruits and vegetables

- SFA received comments during the public consultation that it was not feasible to implement lot identification for prepacked fresh whole fruits and vegetables for the following reasons:
 - Fruits and vegetables packed in a single packaging may come from multiple sources, hence it would not be feasible to declare multiple codes tracing back to the different sources
 - Singapore is a small market and it is not feasible to tailor the packaging to include lot identification only for the Singapore market where the producing country does not have such a requirement. It is also not economically viable to paste lot identification stickers locally and it is more economical and expedient to dispose the produce entirely rather than trace the implicated lot/batch
- In view of the above reasons, prepacked fresh whole fruits and vegetables have been exempted from the lot identification requirements



Additional Types of Prohibited Claims

Regulation 9(2)

Additional types of claims that are prohibited

- The following new claims / suggestions are prohibited to be made in relation to food
 - a. that other foods are unsafe for consumption;
 - b. that an ingredient permitted by the Food Regulations in food is unsafe for consumption;
 - c. the food does not contain a food additive that is not permitted by the Food Regulations; or
 - d. The food does not contain any substance that is prohibited in food



**Applies to both
labels and
advertisements**

Additional types of claims that are prohibited

- Claim or suggestion in relation to food that implies:
 - a. that other foods are unsafe for consumption



Additional types of claims that are prohibited

- Claim or suggestion in relation to food that implies:
 - b. that an ingredient permitted by the Food Regulations in food is unsafe for consumption



Additional types of claims that are prohibited

- Claim or suggestion in relation to food that implies:
 - c. the food does not contain a food additive that is not permitted by the Food Regulations



Additional types of claims that are prohibited

- Claim or suggestion in relation to food that implies:
 - a. the food is a source of a nutrient or other beneficial substance
 - b. the food is a source of a nutrient or other beneficial substance in a form that is more bioavailable than the nutrient or substance in the food
 - c. the food is a source of a nutrient or other beneficial substance in a form that is more easily absorbed than the nutrient or substance in the food
 - d. the food does not contain any substance that is prohibited in food



New standard for gluten-free and reduced gluten food and associated claims

Regulation 250B

Regulation 250B – Gluten-free and reduced gluten food

- Cereals containing gluten is listed as one of the ingredients that are known to cause hypersensitivity in individuals and are required to be declared under the statement of ingredients (Regulation 5(4)(ea))
- To further help with the dietary management of consumers with gluten hypersensitivity, SFA has adopted the following definition and criteria on claims related to gluten.

Terms	Definitions / Criteria
Gluten	“gluten” means a protein fraction from a cereal, to which some persons are hypersensitive, and that is insoluble in water or 0.5M NaCl, that is, 0.5 molar sodium chloride solution
“Gluten – free food”	“Gluten – free food” means food – (a) that is not or does not contain a cereal and contains 20 mg/kg or less of gluten by weight of the food as sold to the purchaser; or (b) that is or contains a cereal but has been processed so that it contains 20 mg/kg or less of gluten by weight of the food as sold to the purchaser

Regulation 250B – Gluten-free and reduced gluten food

Terms	Definitions / Criteria
“Naturally gluten – free food”	“Naturally gluten-free food” means food that is not or does not contain a cereal and contains 20 mg/kg or less of gluten by weight of the food as sold to the purchaser
“Reduced gluten food”	“Reduced gluten food” means food that is or contains a cereal but has been processed so that it contains more than 20 mg/kg but less than or equal to 100 mg/kg by weight of the food as sold to the purchaser
Cereal (in the context of the new Regulation 250B)	(a) barley; (b) oat; (c) rye (d) wheat – that is, durum wheat, Khorasan wheat, spelt or any other <i>Triticum</i> species; (e) a hybridised strain of a cereal mentioned in (a), (b), (c) or (d); and (f) a product of a cereal mentioned in (a), (b), (c) or (d)

Regulation 250B – Gluten-free and reduced gluten food

(a) When a package of food contains only gluten-free / naturally gluten-free / reduced gluten food

- No restrictions on the placement of the words “gluten-free” / “naturally gluten-free” / “reduced gluten” on the label
- Food businesses must ensure that the food complies with the relevant criteria specified in the new regulation 250B



Regulation 250B – Gluten-free and reduced gluten food

(b) When the package of food is made of a gluten-free food / naturally gluten-free food / reduced gluten food **and** any other food.

- For example, the package of food consists of potato chips with wheat-based seasoning. The potato chips are naturally gluten-free but the seasoning is not. Therefore, the words “naturally gluten-free” if used on the label, must appear **immediately before or after** the name “potato chips”.
- This is to prevent consumers from misunderstanding that the entire product is naturally gluten free.



Regulation 250B – Gluten-free and reduced gluten food

- Food products that are labelled as “gluten-free” and which contain the specified cereals (see slide 38 for the specified cereals) or their products must still declare the presence of the cereals in the statement of ingredients
 - This is because the allergen labelling requirements in Regulation 5(4)(ea) and the new Regulation 5(4)(vii) require the presence of the cereal containing gluten to be declared
 - Gluten may still be present in the food as the threshold for “gluten-free” claim is set at **20 mg/kg or less** of gluten by weight of the food as sold to the purchaser

Common Questions

Common Questions

Question	Answer
Will the “Guide to Food Labelling and Advertisements” be updated following the gazettal?	Yes, SFA will update and make the guide available before the labelling amendments come into effect on 30 January 2026.
When must I comply with the new labelling requirements	The new labelling requirements will come into effect on 30 January 2026. Food businesses are to ensure that your prepacked food products made available for sale in Singapore on or after 30 January 2026 comply with the requirements. Sticker labels can be used to incorporate the mandatory labelling information on the labels of your food product as long as 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.
What type of foods are these labelling amendments applicable to?	The labelling amendments apply to prepacked food. Prepacked food does not include food that is loosely packed, food that is prepared upon customers’ orders and subsequently packed for delivery convenience, such as catered meals or restaurant-prepared dishes for delivery.
Is it mandatory to declare the terms “natural”, “nature identical” or “artificial” for the flavouring used?	If flavourings are used as ingredients in your prepacked food, they may be declared using the generic term “flavour” or “flavouring”. The qualifiers “natural” / “nature identical” / “artificial” are optional for the use of the generic terms “flavour” / “flavouring” and food businesses may simply declare as “flavour” / “flavouring” or they may choose to declare as “nature identical flavours” or “artificial flavours”, if applicable.

Thank you