

Guidelines on the declaration of statement of ingredients for food products

Steps on how to declare:

Please follow the 4 general steps below when declaring the statement of ingredients for food products.

Step 1: List down all the ingredients used in a food product in their exact identities and arrange them in descending order of the proportions in which they are present.

Step 2: Identify the compound ingredients used in the food product. Find out what are the constituents of the compound ingredients by checking with suppliers or any documents (such as product specification sheets) provided by suppliers.

Step 3: Find out whether there are any simplified forms for declaring the ingredients and additives. Food companies may use the permitted generic terms listed under the First Schedule of the [Food Regulations](#) for the declaration of ingredients. For food additives, besides declaring their [exact chemical names](#), food companies may use the [International Numbering System \(INS\)](#) or E numbers.

Step 4: Check the presence of any ingredients/additives that are known to cause hypersensitivity and label the exact identities of these ingredients/additives accordingly.

An example on how to declare:

A prepacked frozen pancake product with the following recipe is used to illustrate the process of declaring the statement of ingredients.

Product Recipe

Ingredients/additives used	Amount (g)
Wheat flour	680
Full cream milk	880
Vegetable margarine	120
Egg powder	140
Sugar	110
Salt	40
Baking soda	20
Tartaric acid	10
Total	2000

Step 1: List down all the ingredients used in a food product in their exact identities and arrange them in descending order of the proportions in which they are present.

Ingredients/additives used	Amount (g)
1. Full cream milk	880
2. Wheat flour	680
3. Egg powder	140
4. Vegetable margarine	120
5. Sugar	110
6. Salt	40
7. Baking soda (sodium bicarbonate)	20
8. Tartaric acid	10
Total	2000

Largest amount



Smallest amount

Step 2: Identify the compound ingredients used in the food product.

1. Tabulate the ingredients and identify whether they are compound ingredients. A compound ingredient is an ingredient which is made from two or more ingredients.

Ingredients/additives used	Is this a compound ingredient ?
1. Full cream milk	No
2. Wheat flour	No
3. Egg powder	No
4. Vegetable margarine	Yes
5. Sugar	No
6. Salt	No
7. Sodium bicarbonate	No
8. Tartaric acid	No

2. Find out what are the constituents of the compound ingredients by checking with suppliers or any documents (such as product specification sheets) provided by suppliers.

References:

a) A non-exhaustive list of common compound ingredients is given in Annex 1.

3. Arrange the constituents of the compound ingredients in descending order of the proportions in which they are present (Refer to Step 1).

Based on the product specification sheet for ‘vegetable margarine’, the constituents of “Vegetable margarine” are listed below:

Constituents of compound ingredient in descending order of the proportions in which they are present

Vegetable margarine:
Partially hydrogenated palm oil, water, salt, emulsifiers (mono- and diglycerides of fatty acids, polyglycerol esters of fatty acids), antioxidants (butylated hydroxyanisole, butylated hydroxytoluene) and butter flavour

Step 3: Find out whether there are any simplified forms for declaring the ingredients (ie, generic terms) and additives (ie, INS or E numbers).

1. Food companies shall declare the exact identities of food ingredients and/or additives used in the food products. Food companies may also declare using permitted generic terms, INS numbers or E numbers which help to minimise space required for the labelling of statement of ingredients.

References:

- a) The list of permitted generic terms can be found in the First Schedule of the [Food Regulations](#).
- b) The list of permitted food additives and the corresponding INS numbers can be found in ‘Food additives permitted under the Singapore Food Regulations’ downloadable from [AVA website](#).

2. Tabulate the ingredients/additives which can be declared using generic terms or INS numbers.

Ingredients/additives used	Can generic term/INS number be used?
1. Full cream milk	No
2. Wheat flour	No
3. Egg powder	No
4. Vegetable margarine:	No
• Partially hydrogenated palm oil	Generic term “partially hydrogenated vegetable oil”
• Water, salt	No
• Emulsifiers (Mono- and diglycerides of fatty acids and polyglycerol esters of fatty acids)	Generic term ‘emulsifier’ and/or INS 471 and INS 475 for the respective emulsifier
• Antioxidants (Butylated hydroxyanisole and Butylated hydroxytoluene)	INS 320 INS 321
• Butter flavor	Generic term ‘flavouring’

5. Sugar	No
6. Salt	No
7. Sodium bicarbonate	INS 500ii
8. Tartaric acid	INS 334

Step 4: Check the presence of any ingredients/ additives that are known to cause hypersensitivity and label the exact identities of these ingredients/ additives accordingly

- Some foods ingredients/additives are known to cause hypersensitivity. Examples of these ingredients/ additives are peanuts, cereals containing gluten, crustaceans, eggs, milk and sulphites.

References:

- [The Food Regulations, regulation 5\(4\)\(ea\)](#)
- ['A Guide to Food Labelling and Advertisements' – Page 4](#)

- Tabulate the ingredients/additives that are known to cause hypersensitivity.

Ingredients/additives used	Derived from allergenic source?
Full cream milk	Yes
Wheat flour	Yes
Egg powder	Yes
Vegetable margarine:	
- Partially hydrogenated palm oil	No
- water, salt	No
- Mono- and diglycerides of fatty acids (INS 471)	No
- Polyglycerol esters of fatty acids (INS 475)	No
- Butylated hydroxyanisole (INS 320)	No
- Butylated hydroxytoluene (INS 321)	No
- butter flavour	No
Sugar	No
Salt	No
Sodium bicarbonate (INS 500ii)	No
Tartaric acid (INS 334)	No

- Label the exact identities of the ingredients/additives that are known to cause hypersensitivity. Generic terms should not be used to declare these ingredients/additives. Refer to the ["Guidelines for the declaration of foods and ingredients known to cause hypersensitivity"](#) on how to declare such ingredients/additives.

Options for declaring statement of ingredients

Based on the information gathered from the above steps, three options are available for the declaration of statement of ingredients for the frozen pancake product. 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, water, 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, water, 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, water, salt, emulsifiers, INS 320, INS 321, flavouring), sugar, salt, INS 500ii, INS 334

ANNEX 1 – Non-exhaustive list of common compound ingredients

Applesauce
Baking powder
Butter
Cake flour
Cheese
Chocolate chips
Fish sauce
Icing
Invert sugar syrup
Jam
Jelly
Ketchup
Margarine
MayonnaiseNon dairy creamer
Oyster sauce
Peanut butter
Salad dressing
Seasoning
Self-raising flour
Shortening
Soya sauce/shoyu
Sour cream
Vinegar
Worcestershire sauce
XO sauce
Yogurt
Zabaglione sauce