

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

**A publication of the  
Agri-Food & Veterinary Authority, Singapore  
October 2011**



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# Introduction

This Guidebook aims to provide food importers, manufacturers and retailers 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 self-checklist to assist industry members to self-check your food labels and advertisements before sale/publication. Industry members are responsible to ensure that your food products comply with the safety, specification standards and the labelling requirements stipulated under the Food Regulations.

In addition, industry members are advised to make reference 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 websites:

<http://agcvldb4.agc.gov.sg/>

<http://www.ava.gov.sg/>

Please note that the information and the checklist provided in the material do not serve as any forms of certification or approval of food labels.

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.”

# General Labelling Requirements

The following basic information is required to be declared in English on the labels of prepacked foods:

## **(a) Name or description of food**

A common name or a description which is sufficient to indicate the true nature of the food product. 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.

## **(b) Statement of ingredients**

A complete list of ingredients and additives used in the food listed in descending order of the proportions by weight in which they are present. For instance, the ingredients listed at the top of the list should be the one that weighed the most compared to the rest of the ingredients.

It is not mandatory to state that a food contains water, however, the use of the synthetic colouring matter, tartrazine, must be stated in the list of ingredients as either "tartrazine", or "colour (102)" or "colour (FD&C Yellow #5)" or similar words.

The exact identity or the permitted generic terms<sup>1</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.

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

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<sup>1</sup> Under regulation 5(4)(b) of the Food Regulations, the name and description of ingredients should indicate their true nature. Generic terms are not acceptable except for ingredients belonging to food groups listed in the First Schedule of the Food Regulations.

**(c) Declaration of foods and ingredients known to cause hypersensitivity**

Regulation 5(4)(ea) requires declaration of foods and ingredients known to cause hypersensitivity. The following foods and ingredients are required to be declared when present as an ingredient/additive or as a component of a compound ingredient:

- |   |  |
|---|--|
| (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 | 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). |

## Guidance on how to declare

### 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 should be declared clearly in the statements of ingredients in descending order by weight. 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 (water, 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 should 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 are given in Table 1.

**Table 1**

<b>If the food allergen is.....</b>	<b>Option 1: Declaration using statement of ingredients</b>	<b>Option 2: Declaration using “Contains” statement</b>
(i) a food ingredient or a food additive  Examples: Peanut oil, lecithin	List and declare clearly all food ingredients in descending order by weight. 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.	All food ingredients and additives must be declared clearly 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:  Contains: peanut, egg
(ii) an ingredient of a compound ingredient  Example: A cake made of batter containing wheat flour	Composition of the compound ingredients have to be declared in parenthesis next to the compound ingredients.  Example: Batter (water, cornstarch, wheat flour, salt, sodium bicarbonate)	If wheat flour is declared as “flour” in the statement of ingredients, the “Contains” statement can be used as follows:  Contains: wheat
(iii) a food ingredient or food additive derived from allergenic sources  Examples: Peanut oil, lecithin, sodium caseinate	Description must be provided in order to highlight ingredients that are derived from allergenic sources.  Examples: Peanut oil, lecithin (egg product), sodium caseinate (from milk)	A “Contains” statement can be provided to highlight the source of allergens for peanut oil, lecithin, sodium caseinate, as follows:  Contains: peanut, egg, milk

## 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\* as fining/clarifying agents in beer and wine, these ingredients are not required to be declared on the label. Food traders have to bear full responsibility for ensuring that the information they choose not to declare does not, in actual 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. Nonetheless, food traders whose products carry the “may contain” statement, may be required to provide justification if consumers raise any concerns on the presence of potential food allergens.

\* *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) Declaration of net content in package**

The net quantity of the food present in the package is required to be declared on the label. The net quantity is derived using the Minimum Quantity System or the Average Quantity System, and must be expressed in terms of volumetric measure for liquid foods (for example, millilitres, litres), net weight for solid foods (for example, grams, kilograms) or either weight or volumetric measure for semi-solid or viscous foods such as tomato paste, yoghurt. In the case of weight measure, suitable words such as “net” shall be used to describe the manner of measure.

Food packed in a liquid medium<sup>2</sup> will be required to have 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.

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

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<sup>2</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.

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 AVA on the declaration of “drained weight” for specific products.*

For frozen food that has been glazed with ice, both the “gross weight” and “net weight” shall be declared. The net weight declared for such product must exclude the weight of the ice glazing. For example, the net content declaration of glazed sutchi fish fillet will be declared as “Gross weight of fish: 1000g; Net weight of fish: 800g.

The information stated in paragraph (a), (b), (c) and (d) should be in printed letters not less than 1.5 mm in height.

**(e) Name and address of the local manufacturer or importer**

The name and address of the local manufacturer, packer or vendor should be printed on the labels of foods of local origin. In the case of an imported food, the label should indicate the name and address of the local importer, distributor or agent. Telegraphic, facsimile and post office addresses alone are not acceptable.

**(f) Country of origin of food**

The name of the country of origin of the food should be indicated on the labels for imported foods. The name of a city, town or province alone is not acceptable.

## **Exemptions**

Labelling requirements do not apply under these conditions:

- (i) food weighed, counted or measured in the presence of the purchaser.
- (ii) food that is loosely packed at the retailer's premises.
- (iii) intoxicating liquors are not required to carry a statement of ingredients on their labels.

## **Points to note**

Prepacked foods that are intended for human consumption and offered as a price, reward or sample for the purpose of advertising are required to comply with the labelling requirements stated under "General Labelling Requirements".

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.

Pet foods should not carry any word to indicate or imply that the food is also fit or suitable for human consumption.

## Additional Labelling Requirements

### Date-marking of expiry date

The prepacked foods listed in Table 2 are required to be labelled with their expiry dates. Expiry date refers to the date after which the food may not retain its normal nature and quality.

The expiry date should be qualified by words like "USE BY", "SELL BY", "EXPIRY DATE", "BEST BEFORE" or other words of similar meaning. Where the validity of the date mark is dependent on its storage, the storage direction of that food must be stated on the label or package. For example: "BEST BEFORE : 31 Dec 2010. Store in a cool, dry place."

The date-marking must be permanently marked or embossed on the package, and printed in letters not less than 3mm in height.

**Table 2**

<b>List of prepacked foods that is required to be date-marked with their expiry dates</b>	<b>Format of date marking</b>
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 date of pasteurised milk can be declared as " <b>31 May 12</b> " or " <b>31 May</b> ".
2. Cultured milk and cultured milk drink.	
3. Pasteurised milk and pasteurised milk drink.	
4. Yoghurt, low-fat yoghurt, fat-reduced yoghurt, non-fat yoghurt and yoghurt products.	
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",	

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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 vegetables<sup>3</sup> such as cut fruits and vegetables but excluding all other forms of raw fruits and vegetables.

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- |   |   |
|---|---|
| <ol style="list-style-type: none"><li>9. Vitaminised fruit juice and vitaminised fruit juice drink.</li><li>10. Vitaminised vegetable juice and vitaminised vegetable juice drink.</li><li>11. Liquid milk and liquid milk products excluding condensed milk, sweetened condensed milk, evaporated milk and canned sterilized milk and milk products.</li><li>12. Flour.</li><li>13. Salad dressing.</li><li>14. Mayonnaise.</li><li>15. Raisins and sultanas.</li><li>16. Chocolate, milk chocolate and chocolate confectionery in which the characteristic ingredient is chocolate or cocoa, with or without the addition of fruits or nuts.</li><li>17. Breakfast-cereal with or without fruit and nuts except cereal in cans.</li><li>18. Infants' food.</li><li>19. Edible cooking oils.</li></ol> | <p>The day of the date mark is optional. For example, the expiry date of infants' food can be declared as either "<b>31 May 12</b>" or "<b>May 12</b>".</p> |
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<sup>3</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.

## **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 label 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)

### **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 so as to possess nutritive and assimilative properties to meet the special dietary need 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 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).

### ***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).

### ***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**

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

### ***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.

### ***Infants' food and infant formula***

Infants' food is any food suitable for infants<sup>4</sup> and includes infant formula formulated for infants from birth to 6 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.

<sup>4</sup> 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:

<http://www.hpb.gov.sg/foodforhealth/article.aspx?id=7112>

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

### **Nutrition labelling**

Nutrition labelling is required only 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**

Servings per package ( <i>here insert number of servings</i> )*		
Serving size: ( <i>here insert the serving size</i> )*		
	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, <http://www.hpb.gov.sg/edumaterials/default.aspx>*

***Additional requirements for 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.”

### **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**

<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
Compounded liquor	Regulation 210
Infant formula	Regulation 254
Rice	Regulation 260

## 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”

## **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 also prohibited.

# **Use of Nutrition Claims and Health Claims**

## **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 as long as 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 I for the relevant vitamin or mineral, per reference quantity for that food as laid down in Table II.

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 I for the relevant vitamin or mineral, per reference quantity for that food as laid down in Table II.

**TABLE I**  
**VITAMINS AND MINERALS**

<b>Substances</b>	<b>To be calculated as</b>	<b>Daily Allowance</b>
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 II**

<b>Food</b>	<b>Reference Quantity</b>
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

## Health claims

### *(i) Nutrient function claims*

In principle, nutrient function claim (see Appendix I 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 sufficient 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 particular 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.

## List of acceptable nutrient function claims

### Macronutrients

#### Protein

- Protein provides the essential amino acids needed to aid in the building and maintenance of body tissues.
- Protein helps in tissue building and growth.

#### Lactose

- Low lactose content allows easier digestion/eases digestion for people who are lactose intolerant.

#### Dietary Fibre

- Aids the digestive system.

### Vitamins and Minerals

#### Calcium

- Calcium helps build/to support development of strong bones and teeth.

#### Iodine

- Iodine is essential for the synthesis of thyroid hormones by the thyroid gland.

#### Iron

- 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.
- Iron is needed to produce haemoglobin, the protein in red blood cells that carries oxygen to tissues.
- Iron is needed to produce myoglobin, the protein that helps supply oxygen to muscle.

Magnesium helps in the absorption and retention of calcium.

Zinc is essential for growth.

### Vitamin A

- Vitamin A is essential for the functioning of the eye.

### Vitamin B

- Vitamins B1, B2 and B3 help to release energy from proteins, fats and carbohydrates.
- Vitamin B6 is important for the production of energy.
- Vitamin B12 is necessary for fat, carbohydrate and protein metabolism.
- Vitamin B12 is needed for/helps in the formation of red blood cells.

### Folate (for pregnant women)

- Folate helps support foetus' growth and overall development.
- Folate plays a role in the formation of red blood cells.
- Folate, taken before and during early pregnancy, helps in the mental/normal and overall development of foetus.
- Folic acid is essential/important for growth and division of cells.

### Vitamin C

- Vitamin C enhances absorption of iron from non meat products.

### Vitamin D3

- Vitamin D3 helps support calcium absorption and improves bone strength.
- Vitamin D3 helps the body utilize calcium and phosphorus.

## Vitamin E

- Vitamin E is an antioxidant that helps protect cells in the body.
- Anti-oxidants like carotenes and Vitamin E help to protect cells from free radicals that may have escaped the natural processes of our body system.

Vitamin K and vitamin D work synergistically on bone metabolism to improve bone strength/build strong bones.

## **List of acceptable nutrient function claims specific to infant food and foods for young children (up to 6 years of age)**

Choline helps support overall mental functioning.

Docosahexaenoic acid (DHA) and arachidonic acid (ARA) are important building blocks for development of the brain and eyes in infant. *(only for food for children up to 3 years of age)*

Nucleotides are essential to normal cell function and replication, which are important for the overall growth and development of infant.

Taurine helps to support overall mental and physical development.

Zinc helps in physical development.

Prebiotic blend (Galacto-oligosaccharides and long chain Fructo-oligosaccharide)<sup>5</sup>, zinc, and iron support the child's natural defences.

Nucleotides<sup>6</sup> support body's natural defences (only for infant formula targeting infants less than 1 year of age)

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<sup>5</sup> The combination of galacto-oligosaccharides (GOS) and Long chain fructo-oligosaccharide (lcFOS) present in the product must be in the ratio of 9:1.

<sup>6</sup> The total nucleotides content must be within the range of 72mg/L to 115mg/L.

## **(ii) Other function claims**

The following other function claims (see Appendix I for definition) may only be used in the exact approved form. Truncated or reworded versions which deviate from the intended meaning of the originally approved claim is not acceptable.

### **List of acceptable other function claims**

#### Collagen

- Collagen is a protein in connective tissues found in skin, bones and muscles.

#### Probiotics

- Helps to maintain a healthy digestive system.
- Helps in digestion.
- Helps to maintain a desirable balance of beneficial bacteria in the digestive system.
- Helps to suppress/fight against harmful bacteria in the digestive system, thereby helping to maintain a healthy digestive system.

#### Prebiotics

- Prebiotic promotes the growth of good *Bifidus* bacteria to help maintain a healthy digestive system.
- Inulin helps support growth of beneficial bacteria/good intestinal flora in the gut.
- 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.
- Inulin helps increase intestinal *bifidobacteria* and helps maintain a good intestinal environment.

*Note: The name of the probiotic or prebiotic must be specified in the statement of ingredients whenever a claim is made in relation to that probiotic or prebiotic. There is no minimum quantity of collagen/probiotics/prebiotics required to be added for use of other function claims. The quantity present in the food product should be safe and suitable for general consumption and is sufficient to deliver the intended function claims. Companies must be able to substantiate with acceptable documentary proof/scientific evidence when queried.*

### Foods containing phytosterols, phytosterol esters, phytostanols or phytostanol esters

The ingredients may only be used in the following three categories of special purpose foods that are intended for persons who require a special diet for the purpose of lowering blood cholesterol, as specified under regulation 250A of the Food Regulations.

- (i) Milk containing no more than 3g total fat per 100g, or 1.5g total fat per 100mL
- (ii) Yoghurt containing no more than 3g total fat per 100g
- (iii) Fat spread

Food products which fulfil the above criteria may qualify for use of the following claim. Applications for use of the claim are to be submitted to AVA.

- 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.

The product labels should also bear the following mandatory information:

- (a) The product is a special purpose food intended exclusively for people who want to lower their blood cholesterol level;
- (b) Patients on cholesterol lowering medication should only consume the product under medical supervision;

- (c) The product may not be nutritionally appropriate for pregnant and breast-feeding women and children under the age of 5 years;
- (d) The product should be used as part of a balanced and varied diet, including regular consumption of fruit and vegetables to help maintain carotenoid levels;
- (e) Consumption of more than 3g per day of added phytosterols or phytostanols should be avoided; and
- (f) A statement suggesting the amount of the food (in g or ml) to be consumed each time (referred to as a serving) and the number of servings suggested to be consumed per day, with a statement of the amount of phytosterols or phytostanols that each serving contains.

***(iii) Nutrient specific diet-related health claims***

The nutrient specific diet-related health claims listed in Table 7 (see “reduction of disease risk claims” defined in Appendix I) for prepacked foods may be used if (i) they meet the criteria stipulated under the Fourteenth Schedule; and (ii) they have been approved by the Health Promotion Board (HPB) to carry the Healthier Choice Symbol (HCS).

*For applications of HCS symbol, please contact:*

*Nutrition Department*

*Adult Health Division*

*Health Promotion Board*

*No. 3 Second Hospital Avenue #04-00*

*Singapore 168937*

*Fax: 6435 3609*

*Email: [hpb\\_nutrition\\_dept@hpb.gov.sg](mailto:hpb_nutrition_dept@hpb.gov.sg)*

**Table 7**

<b>Claims</b>	<b>Criteria</b>
A healthy diet with adequate calcium and vitamin D, with regular exercise, helps to achieve strong bones and may reduce the risk of osteoporosis. ( <i>Name of food</i> ) is a good source of/high in/enriched in/fortified with calcium.	<ol style="list-style-type: none"><li data-bbox="719 310 1383 415">1. At least 50% of calcium RDA, which is taken as 800mg and</li><li data-bbox="719 457 1383 646">2. Low in fat (<math>\leq 3\text{g}</math> fat per 100g or <math>\leq 1.5\text{g}</math> fat per 100ml) or Fat free (<math>\leq 0.15\text{g}</math> fat per 100g or 100ml)</li></ol>
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.	<ol style="list-style-type: none"><li data-bbox="719 800 1383 1241">1. No added salt or Salt/ sodium free (<math>\leq 5\text{mg}</math> sodium per 100g) or Very low in salt/ sodium (<math>\leq 40\text{mg}</math> per 100g) or Low in sodium (<math>\leq 120\text{mg}</math> per 100g) or Reduced sodium (if sodium content per reference quantity is <math>\leq 15\%</math> of sodium RDA of 2000mg)</li></ol>

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

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A healthy diet rich in whole grains<sup>7</sup>, fruits and vegetables that contain dietary fibre, may reduce the risk of heart disease. (*Name of food*) is low/free of 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:  $\leq 3$ g fat per 100g or  $\leq 1.5$ g fat per 100ml, or Fat free:  $\leq 0.15$ g fat per 100g or 100ml; and

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<sup>7</sup> 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.

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.
-

## **Application for new health claims**

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

<http://www.ava.gov.sg/FoodSector/FoodLabelingAdvertisement>

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 particular 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 with regard to 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.

## Methods of Analysis

It is the responsibility of importers and manufacturers 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:

<http://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.

AVA conducts laboratory testing to verify the accuracy of nutrition information declared in food labels from time to time. 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.

## **Contacts**

Regulatory Administration Department  
Agri-Food & Veterinary Authority  
5 Maxwell Road, #18-00,  
Tower Block, MND Complex,  
Singapore 069110  
Fax: 6220 6068

For clarification, please write to  
[AVA\\_LabelsAndClaims@ava.gov.sg](mailto:AVA_LabelsAndClaims@ava.gov.sg)

## Appendix I

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

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.”

- (b) **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.”

- (c) **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.”

Food<sup>8</sup> 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.

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<sup>8</sup> 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.

## **Appendix II**

### **Checklist for food labels and advertisements**

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

Importers, manufactures and retailers are reminded that it is your responsibility to ensure that your food products comply with the safety and specification standards, as well as the labelling requirements stipulated under Food Regulations. You are also required to ensure that the advertisements used for your 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 Agri-Food & Veterinary Authority (AVA). Importers, manufactures and retailers are advised to make reference to the Sale of Food Act and the Food Regulations for the actual legal text where necessary.

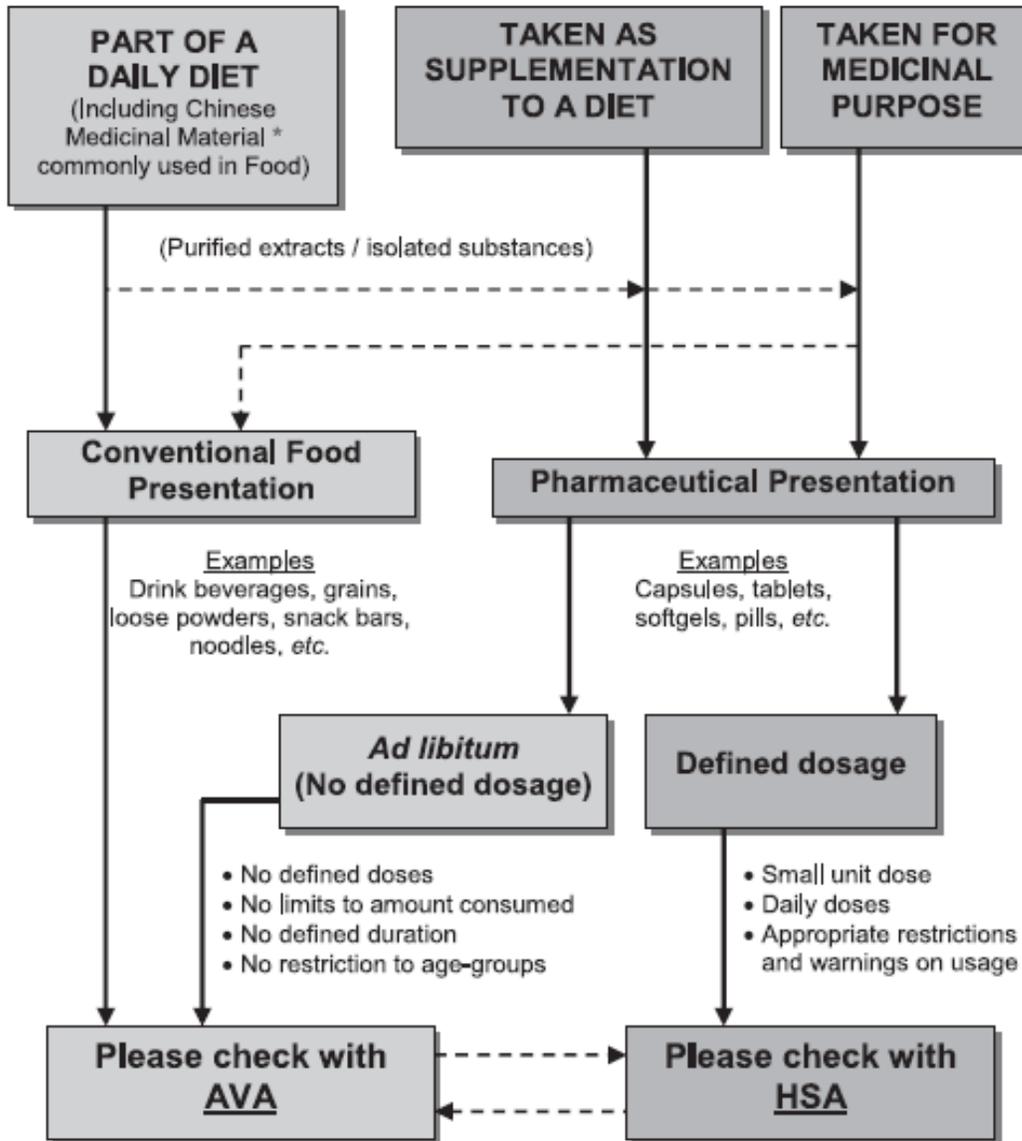
## **How to use the checklist**

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 under AVA's purview.
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: Classification of products

The following classification tree provides guidance for the classification of products whose presentation, ingredients or function fall into the food-health product interface.



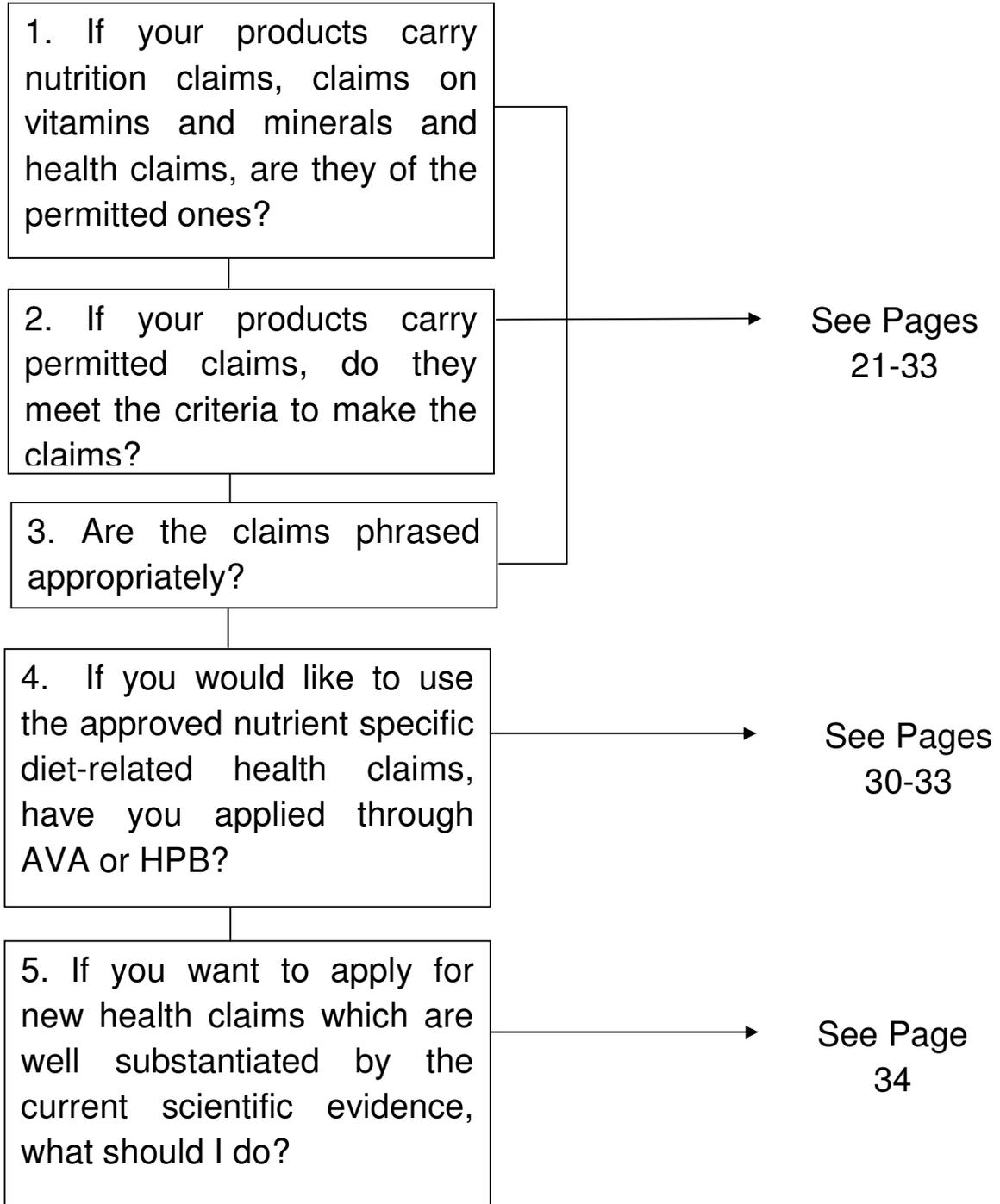
\* A Chinese medicinal material (CMM) is a medicinal material (herb, animal part or mineral) used in the practice of traditional Chinese Medicines

## 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, packer or local vendor.		
6.	Are items <b>(1) to (5)</b> printed in English?		
7.	Are items <b>(1) to (3)</b> 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

