

All claims made should be substantiated. The literature should be of established sources, e.g. Martindale, peer reviewed scientific journals.

c) Endorsements and Testimonials from Healthcare Professionals

Product should not be labelled, advertised or promoted to give the impression of advice or recommendations from healthcare professionals, i.e. visual and/or audio presentation of doctors/dentists/pharmacists or nurses. Testimonials or recommendations by healthcare professionals should not be used in the product label, advertisement or promotion.

d) Testimonials by Non-professionals

Product materials, including label, advertisements, should not contain or refer to any testimonial or endorsement unless it is genuine and related to the personal experience of the party who provided the testimonial. The company should hold proof of identity of the party who provided the testimonial.

Traders should be able to show substantiation that such testimonials reflect the typical experience of ordinary users. Testimonials that are of exceptional experiences (i.e. which do not reflect the experience that an average user of the product would ordinarily expect to have) should not be used.

Testimonials that are obsolete or otherwise no longer applicable should not be used.

e) Claims related to Traditional Use

Product should not be labelled, advertised or promoted in such a way that potentially misleads the general public into believing that the product relates to any traditional healing paradigm, such as being a traditional medicine, when it is not intended as a traditional medicine.

f) Logos, Initials and Trademarks

It is the responsibility of companies to ensure they have the permission of the firm, company or institution before the use of names, initials, logos or trade service marks from the concerned firm, company or institution on their product label, advertisements and promotions. The names and logos of the Health Sciences Authority and any of its professional groups cannot be used for any health supplement product materials including label, packaging, advertisement and sales promotion in any media (print, sound and light & sound).

g) Discourage from Medical Advice

Claims on label, advertisement or promotion should not in any way create an impression that the public need not seek the advice of a medical professional.

h) Exploitation of fear

Claims on label, advertisement or promotion should not arouse fear in the minds of the public nor should they exploit the public's superstition.

i) Reference to Stress

Claims on label, advertisement or promotion should not claim that the use of a particular health supplement is needed to prevent/reduce the stress of modern

living. Any reference to stress should be accompanied by an explanation of how a product may assist in stress management, such as by providing nutritional support, energizing etc.

j) Reference to Performance in Studies

Claims on label, advertisement or promotion should not imply that the consumption of a particular health supplement can improve performance in studies, make a person smarter, improve IQ or improve memory.

k) Reference to Anti-ageing

There should not be direct or indirect suggestion that a particular health supplement can prevent, retard or reverse the physiological changes and degenerative conditions brought about by or associated with ageing.

l) Reference to Sexual Function and Relationships

There should not be any implication that a health supplement can induce sexual virility or manage sexual weakness or sexual excess and conditions such as premature ejaculation, erectile dysfunction.

Claims on label, advertisement or promotion should not imply that the use of a particular health supplement can affect one's love life or relationship with others.

m) Reference to Consumption

Product claims should refrain from encouraging indiscriminate, unnecessary or excessive use of the health supplement.

n) Claims of Safety

There should not be any words, phrases, or illustrations which claim or imply the product has no adverse effects; 100% safety or suggest that the safety of the product is the result of it being a "natural product".

o) Use of Scientific Data

The ignorance of the public should not be exploited by including scientific data that the general public cannot verify or validate. Traders should not misuse or exaggerate research results or extract unnecessary quotations from technical and scientific publications to imply a greater validity than they really have such as with the use of exaggerated graphics or language.

The use of terms such as "Proven by Clinical Trials" and "Clinically Proven" for health supplements would be objectionable if there is an implied claim to treatment efficacy in relation to disease or an adverse condition or that the product has met the appropriate efficacy test in relation to a disease or an adverse condition.

p) Language

Claims should be in simple-to-understand language. The use of confusing jargons and scientific terms should be avoided. Scientific terms should not be used to make claims appear to have a scientific basis they do not possess. Examples of such terms would be "nanoclusters", "pharmaceutical grade".

q) Conformance with SCAP

The Singapore Code of Advertising Practice (SCAP) regulates all local advertising activities. It is administered by the Advertising Standards Authority of Singapore Council to the Consumers Association of Singapore. All health supplement advertisements must also comply with the SCAP guidelines.

21. The below is an illustrative list of objectionable terms and claims. The list is not exhaustive. It will be updated from time-to-time, as new information becomes available. Please check with the Health Supplements Unit on the allowed statements of claims when in doubt.

Examples Of Objectionable Terms And Claims

- Miraculously
- The only product to use
- World's best
- 100% safe
- No side effects
- Guaranteed
- Other drugs / products cannot compare with it
- Sensational relief
- The No. 1 (unless substantiated)
- Efficacious/Effective
- Perpetual youth
- Anti-aging
- Longevity
- Anti-stress
- Boost immunity
- Enhance immunity
- Breast enhancement, enlargement, growth
- Height growth
- Enhance intelligence / Increase IQ
- Increase / improve memory
- Memory enhancement
- Hormone releaser/enhancer/amplifier
- Regulate hormone
- Enhancement of sexual organs
- Sexual powers
- Arousal, Libido

Medical Advertisement Control

22. Certain categories of health supplements are subjected to medical advertisement control. These include, but are not limited to following:

- a. Vitamins and Minerals preparations

- b. Some herbal preparations.
23. An application for the review of advertising materials may be submitted. More information may be obtained from the HSA Medical Advertisements Unit.
24. Further information on the regulatory control of other health products may be obtained from the following website:

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

Please be reminded that the onus of responsibility to ensure safety and quality of health supplement products rests on you as the importer/manufacturer / seller.

Complementary Health Products Branch, Pre-Marketing Division, Health Products Regulation Group, Health Sciences Authority, 11 Biopolis Way #11-01, Helios, Singapore 138667, Tel: +65 6866 3467, Fax: +65 6478 9039, Email: HSA_CHP@HSA.gov.sg.

ANNEX 1

List of ingredients containing prohibited/restricted ingredients for Health Supplement products

Ingredients		Constituent(s) of concern	Restrictions & Control in Health Supplements
1.	Aconitum napellus (Monkshood, Aconite) Other spp: A. carmichaeli, A. kusnezoffii, A. coreanum	Aconite alkaloids	Controlled under Poisons Act
2.	Aristolochia spp	Aristolochic Acids	Controlled under Poisons Act
3.	Artemesia annua (Qing Hao/Sweet Annie/Sweet Wormwood)	Artemisinin	Controlled under Poisons Act
4.	Atropa Belladonna (Deadly nightshade)	Atropine	Controlled under Poisons Act
5.	Catharanthus roseus, Vinca rosea (Periwinkle Madagascar, Old Maid)	Vincristine	Controlled under Poisons Act
6.	Chaparral		Not suitable to be used in Health Supplements.
7.	Cimicifuga racemosa (Black cohosh)		Link with liver adverse reactions. The following cautionary label is required "Warning: This product contains Black cohosh which may harm the liver in some individuals"
8.	Coenzyme Q10 Ubidecarenone		Restricted to 150mg per day. The following cautionary label is required "Do not take while on Warfarin therapy without medical advice"
9.	Colchicum autumnale	Colchicum alkaloids	Controlled under Poisons Act
10.	Corydalis ambigua, C. bulbosa, C. amurensis, C. decumbens, C. pallida, C. racemosa, C. turschaninorii, C. yanhusuo	Corydaine, corydine, tetrahydropalmatine	Controlled under Poisons Act
11.	Corynanthe yohimbi, Pausinystalia yohimbe, (Yohimbe)	Yohimbine	Controlled under Poisons Act
12.	Danthron, Suprofen	Danthron, Suprofen	Controlled under Poisons Act
13.	Datura stramonium (Jimsonweed, Devil's-Apple, Green Dragon, Zombie's Cucumber, Moon Weed, Trumpet Lily, Stinkweed)	Atropine, Hyoscyamine, Hyoscine	Controlled under Poisons Act
14.	Dehydroepiandrosterone (DHEA)	Dehydroepiandrosterone (DHEA)	Controlled under Poisons Act
15.	Dimethyl sulphoxide (DMSO)	Dimethyl sulphoxide (DMSO)	Controlled under Poisons Act

Ingredients		Constituent(s) of concern	Restrictions & Control in Health Supplements
16.	Dimethylaminoethanol (DMAE)	Deanol	Controlled under Poisons Act
17.	Ephedra sinica (Ma huang) Sida cordifolia extract	Ephedrine 1% and above is not allowed in Health Supplements Berberine	Controlled under Poisons Act
18.	Hydrastis Canadensis (Golden Seal), Berberis vulgaris (Barberry), Berberis aquifolium (Oregon Grape), Coptis Chinensis (Chinese goldthread), Coptis Teeta, Chelidonium majus, Mahonia aquifolium, M repens, M nervosa, Phellodendron amurense, P chinense		Controlled under Poisons Act
19.	Hyoscyamus niger (Henbane, Henblain, Jusquaime)	Atropine, Hyoscine, Hyoscyamine	Controlled under Poisons Act
20.	Piper Methysticum (Kava, Kava-kava)	Piper methysticum (kava-kava); kava pyrones (kavalactones)	Controlled under Poisons Act
21.	Lobelia inflata, L. tupa (Lobelia)	Lobelia alkaloids 0.1% and above is not allowed in Health Supplements	Controlled under Poisons Act
22.	Mucuna pruriens (Mucuna prurita) (Cowhage, Cowage)	Dopamine, Nicotine, Physostigmine	Controlled under Poisons Act
23.	N-acetyl cysteine (NAC)	Acetyl cysteine	Controlled under Poisons Act
24.	Nux vomica (Strychnos nux-vomica)	Strychnine Brucine	Controlled under Poisons Act
25.	Pilocarpus jaborandi, P. microphyllus, P. pinnatifolius	Pilocarpine	Controlled under Poisons Act
26.	Pituitary gland, Somatropin, Human Growth hormone, Suprarenal gland, Thyroid gland, Sex hormones, Androstenedione etc	Pituitary gland	Controlled under Poisons Act
27.	Podophyllum peltatum (Mayapple, American Mandrake)	Podophyllin resin	Controlled under Poisons Act
28.	Pomegranate (except bark) (but not present in Polygala species)	Pomegranate, alkaloids	Controlled under Poisons Act
29.	Rauwolfia serpentina (Rauwolfia, Indian snakeroot, Snakeroot)	Reserpine, Rescinnamine	Controlled under Poisons Act
30.	Red Yeast Rice (Sole ingredient – controlled as a CPM)	Lovastatin 1% and above is not allowed in Health Supplements.	Controlled under Poisons Act
31.	Sanquinaria canadensis	Berberine	Controlled under Poisons Act

Ingredients		Constituent(s) of concern	Restrictions & Control in Health Supplements
	(Bloodroot, Indian Paint)		
32.	Solanum dulcamara (Bittersweet nightshade)	Solanaceous alkaloids	Controlled under Poisons Act
33.	Spigelia marilandica (Worm grass)	Strychnine	Controlled under Poisons Act
34.	Symphytum peregrinum, Symphytum officinale (Comfrey)		Not suitable to be used in Health Supplements
35.	Vitamin B15	Pangamic Acid / DMG or dimethylglycine	Prohibited under Sales of Drugs Act
36.	Vitamin B17	Amygdalin / Laetrile/ Nitrilosides	Prohibited under Sales of Drugs Act
37.	Vitamin K ₁ (phyloquinone, phytomenadione, phytonadione) Vitamin K ₂ (menaquinone, menatetrenone)		Restricted to oral dosage forms of multi-vitamin/mineral preparations for adults with maximum limit of 120mcg per day for general health. The following cautionary label or similar wording is required "Consult a healthcare professional prior to use if you are taking a blood thinner such as warfarin"
38.	Vinca minor (Periwinkle, Myrtle)	Vincristine, Vinblastine, Vinpocetine	Controlled under Poisons Act

Please note:

- i) The above list is not exhaustive and will be updated from time-to-time, as new information becomes available.
- ii) Where the routes of administration are other than by oral route, and other considerations such as sterility, bioavailability and quality control become important in the overall safety of the final product, pre-market authorization (i.e. approval & licence) is likely to be required.

HEALTH SCIENCES AUTHORITY

Health Products Regulation Group
Blood Services Group
Applied Sciences Group

www.hsa.gov.sg

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