

A Guide to Food Labelling and Advertisements

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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 of the penalty of non-compliant food labels and advertisement stated under regulation 261 of the Food Regulations quoted below:

“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:

- **Name or description of food**

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

(It is advisable to check "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).

- **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. The exact identity or the permitted generic terms¹ of the ingredients and additives should be declared. However, use of certain food additives such as 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. For compound ingredients which comprise more than one constituent, the constituents should be declared in the descending order. For instance, soy sauce (water, soybean, black bean, salt, sugar, preservatives)

¹ 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.

- **Declaration of net content in package**

At present, the minimum quantity of the food present in the package is required to be declared on the label , either expressed in terms of volumetric measure (for example, millilitres, litres) or net weight (for example, grams, kilograms). In the case of weight measure, suitable words like "Net" shall be used to describe the manner of measure.

The Regulations will soon be amended to require average weight declaration instead of minimum weight. Food packed in a liquid medium will be required to have the drained weight declared. In addition, the net weight of frozen food with ice glazing declared on the label should exclude the weight of ice glazing.

The above information should be in printed letters not less than 1.5 mm in height.

- **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

- **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:

- food weighed, counted or measured in the presence of the purchaser.
- food that is loosely packed at the retailer's premises. For instance, bread packed loosely at the retailer's premises are not required to be labelled with a product name/description, statement of ingredients and net content.
- 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 1 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 1

List of prepacked food that are required to be date-marked with their expiry dates	Format of date marking
1. Cream, reduced cream, light cream, whipped cream and sour cream excluding sterilised canned cream.	The year of the date mark is optional. For example, the expiry date of pasteurised milk can be declared as " 31 May 10 " or " 31 May ".
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", or "doughua", 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, but excluding raw fruits and vegetables.

-
9. Vitaminised fruit juice and vitaminised fruit juice drink.

10. Vitaminised vegetable juice and vitaminised vegetable juice drink.

11. Liquid milk and liquid milk products excluding condensed milk, sweetened condensed milk, evaporated milk and canned sterilized milk and milk products.

12. Flour.

13. Salad dressing.

14. Mayonnaise.

15. Raisins and sultanas.

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.

17. Breakfast-cereal with or without fruit and nuts except cereal in cans.

18. Infants' food.

19. Edible cooking oils.

The day of the date mark is optional. For example, the expiry date of infants' food can be declared as either "**31 May 10**" or "**May 10**".

Foods containing artificial sweetening agents

Foods containing artificial sweetening agents such as saccharin, acesulfame-k, sucralose should include the following words or words of similar meaning on their labels:

“This (*here insert the name of the food*) contains the artificial sweetening agent (*here state the name of the artificial sweetening agent*).”

More information on artificial sweetening agents can be found in regulation 18 of the Food Regulations.

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 2 shows the type of low-calorie food and the permissible calorie content:

Table 2

Food type	Calorie content (less or equal to the stipulated amount)
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' foods refer to foods suitable for consumption by infants and include infant formula. The Food Regulations define "infant" as a person not more than 12 months of age.

Details on the labelling requirements for these foods can be found under regulations 251 to 254 of the Food Regulations.

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. The soft copy of the code can be downloaded from the following HPB website:

http://www.hpb.gov.sg/hpb/default.asp?pg_id=1233&aid=238&altid=0

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, vitamins and minerals 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 is shown as follow.

Nutrition Information Panel

Servings per package (*here insert number of servings*)*

Serving size: (*here insert the serving size*)*

	Per Serving* or	Per 100 g (or 100 ml)
Energy	kcal, kJ or both	kcal, kJ or both
Protein	g	g
Fat	g	g
Carbohydrate	g	g
(<i>here insert the nutrients for which nutrition claims are made, or any other nutrients to be declared</i>)**	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 3 for examples of food categories with specific labelling requirements.

Table 3

Food type	Food Regulations
Irradiated food	Regulation 38
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
Rice	Regulation 260

Warning statements

Products containing the ingredients listed below would need to be labelled with the relevant warning 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

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.

The use of the word “pure” is acceptable only if the food is free from other added substances or is of the composition, strength and quality required under the Regulations.

Use of Nutrition Claims, Vitamins/ Minerals 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, or any other nutrients.

Examples of nutrition claims are "Low in calories", "Sugar free" and "Reduced sodium". Nutrition claims do not include claims pertaining to the presence of vitamins and minerals. 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.

Vitamins and minerals claims

Foods that carry claims on the presence of vitamin(s) and/or mineral(s) are required to contain at least one-sixth of the daily allowance as laid down in Table I for the relevant vitamin or mineral, in per reference quantity for that food as laid down in Table II.

Foods that are claimed to be a rich source of vitamin(s) and/or mineral(s) are required to contain at least 50% of the daily allowance as laid down in Table I for the relevant vitamin or mineral, in per reference quantity for that food as laid down in Table II.

The product labels of foods carrying vitamin(s) and mineral(s) claims should also bear a statement like

"(quantity) of the food contains (quantity) of (name of vitamins/minerals)" to substantiate the claim. For example: "200 ml of this orange juice contains 15 mg of vitamin C".

TABLE I
VITAMINS AND MINERALS

<i>Substances</i>	<i>To be calculated as</i>	<i>Daily Allowance</i>
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	500 mg (to be revised to 800 mg)

Iodine	Micrograms of iodine	100 mcg
Iron	Milligrams of iron	10 mg
Phosphorus	Milligrams of phosphorus	800 mg

TABLE II

<i>Food</i>	Reference Quantity
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 not specified above (diluted according to directions on the label)	200 ml
Liquid food not specified above	200 ml
Solid food not specified above	120 g

The Food Regulations will soon be amended to require complete nutrition labelling for foods carrying vitamin(s) and mineral(s) claims.

Health claims

i) Nutrient function claims

In principle, nutrient function claim (Appendix I) 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, 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.
- 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.

Other nutrients

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 bifido-bacteria, 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.

(Need to specify the name(s) of the probiotic or prebiotic whenever a claim is made in relation to that probiotic or prebiotic.)*

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.

ii) Application for use of nutrient specific diet-related health claims

Local food manufacturers and importers may submit applications to AVA or HPB for use of the following nutrient specific diet-related reduction of disease risk health claims (reduction of disease risk claims are defined in Appendix I).

The approved health claims and criteria have been developed based on Singapore's existing national nutrient claims guidelines formulated by HPB, with reference taken from currently available guidelines established by major developed countries.

Only food products that have been first approved by HPB to carry the Healthier Choice Symbol (HCS) may be considered for application of use of these health claims. HPB will evaluate applications that are concurrently submitted with applications for the HCS. AVA will evaluate separately for products that have been approved with the HCS.

Criteria for use of nutrient specific diet-related reduction of disease risk health claims

The criteria for use of these health claims are tabulated below.

Claims	Criteria
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.	1. At least 50% of calcium RDA, which should be taken as 800mg and 2. Low in fat (≤ 3 g fat per 100g or ≤ 1.5 g fat per 100ml) or Fat free (≤ 0.15 g fat per 100g or 100ml)
A healthy diet low in	1. No added salt or

<p>sodium may reduce the risk of high blood pressure, a risk factor for stroke and heart disease. (<i>Name of food</i>) is sodium free/ low in/ very low in/ reduced in sodium.</p>	<p>Salt/ sodium free (≤ 5mg sodium per 100g) or</p> <p>Very low in salt/ sodium (≤ 40mg per 100g) or</p> <p>Low in sodium (≤ 120mg per 100g) or</p> <p>Reduced sodium (if sodium content per reference quantity is $\leq 15\%$ of sodium RDA of 2000mg)</p>
<p>A healthy diet low in saturated fat and trans fat, may reduce the risk of heart disease. (<i>Name of food</i>) is free of/ low in saturated fats, trans fats.</p>	<ol style="list-style-type: none"> 1. Low in saturated fat (≤ 1.5g saturated fat per 100g, and $\leq 10\%$ of kilocalories from saturated fat) or Free of saturated fat (≤ 0.5g saturated fat per 100g, and $\leq 1\%$ of the total fat is trans fat) and 2. Free of trans fat (< 0.5g per 100g) and 3. Low in sugar (≤ 5g per 100g or ≤ 2.5 g per 100ml) or Sugar free (≤ 0.5g per 100g or Unsweetened) or No added sugar; and 4. Cholesterol at ≤ 100mg per 100g and 5. Its reference quantity should not exceed 25% of sodium RDA, which is taken as 2000mg
<p>A healthy diet rich in whole</p>	<ol style="list-style-type: none"> 1. A product from these food groups -

<p>grains, fruits and vegetables that contain dietary fibre, may reduce the risk of heart disease. (<i>Name of food</i>) is low/ free of fat and high in dietary fibre.</p>	<p>whole grains, fruit, vegetables or fibre fortified foods; and</p> <ol style="list-style-type: none"> 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 100 kcal or $\geq 6\text{g}$ per 100g or 100ml; and 4. With at least 25% of the dietary fibre comprising soluble fibre.
<p>A healthy diet rich in fibre containing foods such as whole grains, fruits and vegetables may reduce the risk of some types of cancers. (<i>Name of food</i>) is free/ low in fat and high in dietary fibre.</p>	<ol style="list-style-type: none"> 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 100 kcal or $\geq 6\text{g}$ per 100g) and 4. Its reference quantity should not exceed 25% of sodium RDA, which is taken as 2000mg.

Note

Whole grain generally refers to the entire grain seed (kernel) and is made up of the bran, the germ and the endosperm. Examples of food rich in whole grains include oats, brown rice, wholemeal/whole wheat noodles, wholemeal breads, and whole grain breakfast cereals. Companies that are keen to formulate wholegrain products are encouraged to contact the Nutrition Department of HPB direct for advice and assistance.

Prepacked fresh fruits and vegetables with acceptable nutrition labelling may be considered on a case-by-case basis.

Applications may be sent to the following AVA/HPB contacts

Agri-Food and Veterinary Authority
5, Maxwell Road, Tower Block
#18-00, MND Complex
Singapore 069110
Tel: 6325 2579
Fax: 6324 4563
Email: AVA_LabelsAndClaims@ava.gov.sg

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

Application for new health claims

Applications for use of nutrient function claims and other function claims (as defined in Appendix I) 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.

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

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

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 (SAC-SINGLAS) 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

Food Control Division
Agri-Food & Veterinary Authority
5 Maxwell Road, #18-00, Tower Block, MND Complex,
Singapore 069110
Tel: 6325 2579
Fax: 6324 4563

For clarification, please write to
AVA_LabelsAndClaims@ava.gov.sg

Operating hours:

Mon - Fri : 8.00am - 1.00pm
 2.00pm - 5.30pm

Sat, Sun
and Public : Closed
Holidays

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.”

Food² 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.

² includes 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.

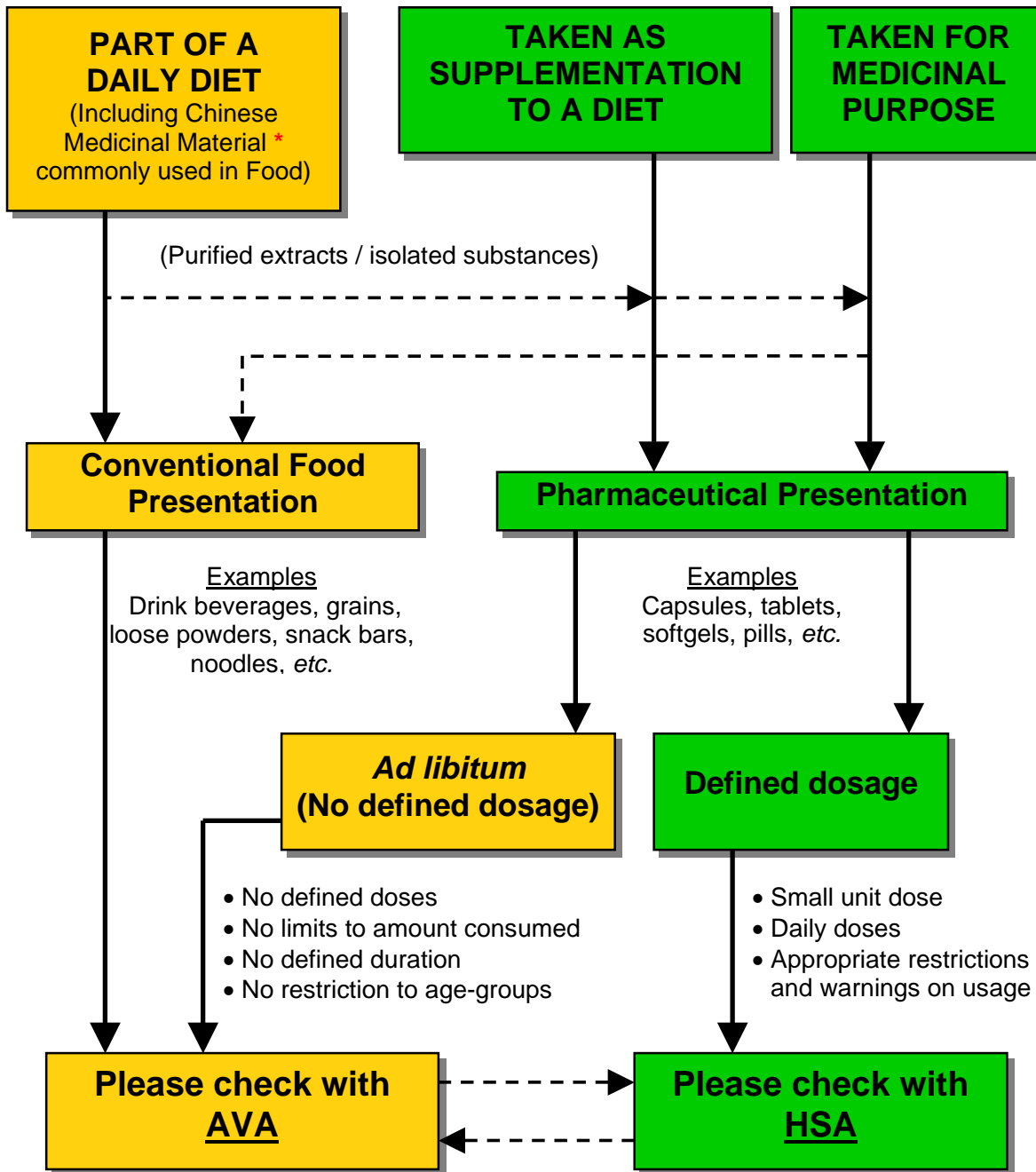
How to use the checklist

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.



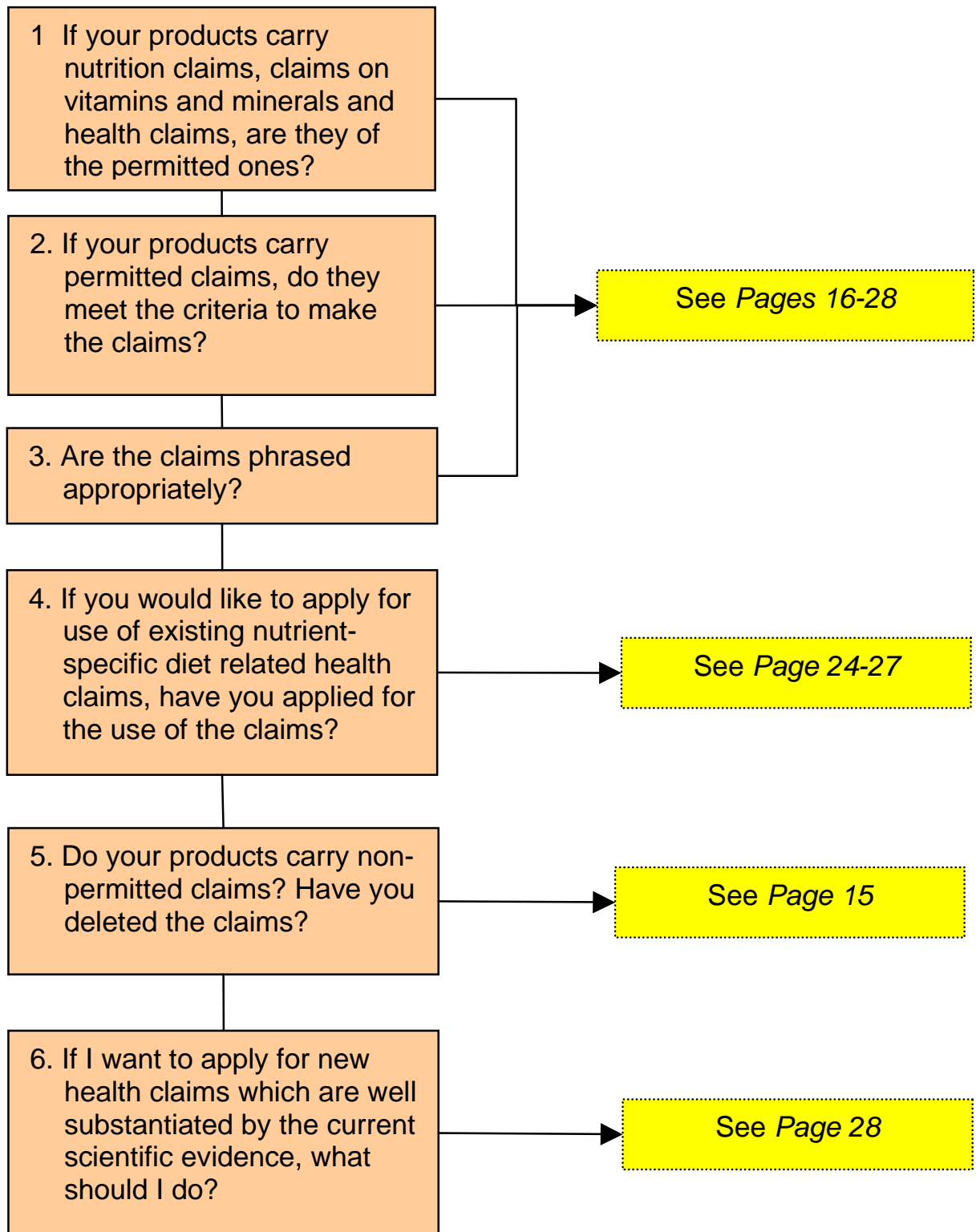
* A Chinese medicinal material (CMM) is a medicinal material (herb, animal part or mineral) used in the practice of traditional Chinese Medicines

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.	Product Name: An acceptable common name or description which is sufficient to indicate the true nature of the product.		
2.	Ingredients List: All ingredients and additives used in the product are listed in descending order by proportion of weight.		
3.	Quantity: The minimum quantity of the food in the package expressed in terms of volumetric measure (for liquid food products) or net weight (for solid food products).		
4.	Imported Food: Name of the country of origin of the product. Name and address of your company as the importer, distributor or agent in Singapore.		
5.	Locally manufactured food: Name and address of the manufacturer, packer or local vendor.		
6.	Are item numbers (1) to (5) printed in English		
7.	Are item numbers (1) to (3) 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

