

A Handbook on Nutrition Labelling (Singapore) *[Revised version 2015]*

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Introduction

Nutrition labelling provides point-of-sale information to help consumers make informed food choices. This handbook provides nutrition labelling information to assist manufacturers, distributors, retailers and other users in the labelling of food products.

In view of the growing interest in nutrition labelling, the Ministry of Health initiated the Nutrition Labelling Programme in 1998. The Programme is implemented in three phases:

- Phase I : Development of nutrition information panel;
- Phase II : Development of the 'Healthier Choice' Symbol; Provision for nutrient claims;
- Phase III : Provision for health claims.

Observations from developed countries show that consumers welcome nutrition labelling as an important source of point-of-sale information to help them moderate or increase their intake of certain nutrients or food.

The provision of nutrition labelling serves as a useful marketing strategy for food companies to improve their market share in the food industry.

This handbook details:

- the format or way in which nutrition information can be presented;
- the definition of nutrient claims;
- the guidelines for nutrient claims;
- the use of Healthier Choice Symbol.

Guidelines in this handbook do not apply to infant formula or any other food products for persons one year of age and below.

Contacts

Questions concerning the nutrition labelling of food products may be directed to:

Level 4, Healthy Food Products Department
Health Promotion Board
3 Second Hospital Avenue
Singapore 168937

Facsimile: (65) 6438 3609

Email: HPB_HCSadmin@hpb.gov.sg

NB: Queries related to food labelling, other than nutrition labelling, should refer to the Food Regulations.

Nutrition Information Panel

A recommended nutrition information panel (NIP) should meet the following basic requirements:

- i) The nutrition information panel can include the core list of nutrients namely energy, protein, total fat, saturated fat, trans fat, cholesterol, carbohydrate, dietary fibre and sodium.
- ii) The energy and nutrient values can be stated in per 100 g / 100 ml and per serving of the food.
- iii) The nutrition information panel can include the number of servings per package and the serving size.
- iv) For powdered beverages and liquid concentrates, an additional column of per 100ml (as reconstituted) can be included.
- v) The variance between the declared value and analysed value has to be within 20%.
(For reference to calculation example, please see section on Nutrient Claim Verification, page 10.)

A typical nutrition information panel is shown in Figure 1a and a nutrition information panel with additional column of per 100ml (as reconstituted) is shown in Figure 1b.

Figure 1a
A typical nutrition information panel

| NUTRITION INFORMATION | | | > Panel Heading |
|--|---------------|--------------------|--------------------|
| Servings per package: (insert number of servings) | | | |
| Serving size: x g (or ml) (insert household measurement) | | | > Serving Size |
| | Per serving | Per 100 g (100 ml) | |
| Energy | x kcal (x kJ) | x kcal (x kJ) | |
| Protein | x g | x g | |
| Total Fat | x g | x g | |
| - Saturated Fat | x g | x g | > Nutrient Listing |
| - Trans Fat | x g | x g | |
| Cholesterol | x mg | x mg | |
| Carbohydrate | x g | x g | |
| - Total Sugar | x g | x g | |
| Dietary Fibre | x g | x g | |
| Sodium | x mg | x mg | |

The panel may be placed on any site on the food package that can be easily seen by the consumer. It is recommended that it be placed with the ingredients list and the name and address of the manufacturer, packer, importer or distributor.

Nutrition Information Panel

1. General Format

- The text of the nutrition information panel shall be in English.
- The text shall be clear, legible and permanent.
- If a nutrition claim is made, the name and quantity of any other nutrient in the food that is relevant to the claim should be declared in the nutrition information panel in addition to the 'core list' of nutrients.
- Values for Energy, Cholesterol and Sodium are to be rounded off to the nearest whole number. Remaining nutrient values are to be rounded off to the nearest one decimal place.

2. Panel Heading

'NUTRITION INFORMATION', 'NUTRITION FACTS', as well as words of similar meanings may be used as the panel heading.

3. Serving Size

Number of servings per package and serving size shall be declared, with the serving size stated both in metric and common household measurements (e.g. pieces, cups, teaspoons).

4. Nutrient Listing

The 'core list' of nutrients includes:

- i) Energy
- ii) Protein
- iii) Total fat
- iv) Saturated fat
- v) Trans fat
- vi) Cholesterol
- vii) Carbohydrate (excluding dietary fibre)
- viii) Dietary fibre
- ix) Sodium

Additional nutrients can be added after the 'core list', with the following exceptions:

- i) Starch and Total Sugar may be declared as a subgroup of carbohydrate.
- ii) Breakdown of the types of sugar eg. Lactose, Fructose, Maltose may be declared as a subgroup of Total Sugar
- iii) Polyunsaturated fat and monounsaturated fat may be inserted after saturated fat.
- iv) Omega fatty acids may be inserted after polyunsaturated fat and before trans-fat.

Nutrition Information Panel

All nutrients shall be declared in the appropriate metric units. The unit for energy will be in kilocalories and/or kilojoules. The conversion factor will have to be stated if only one unit is listed (e.g. one kcal is equivalent to 4.2 kJ as shown in the example below).

Figure 1b

A nutrition information panel with additional column of per 100ml (as reconstituted)

| NUTRITION INFORMATION | | | |
|--|-------------|-----------|--------------|
| Servings per package: 10 Serving Size: 30 g (1 sachet) | | | |
| | Per serving | Per 100 g | Per 100 ml** |
| Energy | 198 kcal* | 660 kcal* | 96 kcal* |
| Protein | 1.5 g | 5.0 g | 0.7 g |
| Total Fat | 10.9 g | 36.3 g | 1.92 g |
| - Saturated Fat | 4.0 g | 13.3 g | 1.9 g |
| Monounsaturated fat | 2.9 g | 9.6 g | 1.4 g |
| Polyunsaturated fat | 4.0 g | 13.3 g | 1.9 g |
| Omega 3 | 0.5 g | 1.7 g | 0.2 g |
| Omega 6 | 0.7 g | 2.3 g | 0.3 g |
| - Trans Fat | 0.1 g | 0.3 g | 0.0 g |
| Cholesterol | 0 mg | 0 mg | 0 mg |
| Carbohydrate | 23.5 g | 78.3 g | 11.3 g |
| - Total Sugar | 18.0 g | 60.0 g | 8.7 g |
| -Fructose | 2.0 g | 6.7 g | 1.0 g |
| Dietary Fibre | 1.5 g | 5.0 g | 0.7 g |
| Sodium | 270 mg | 900 mg | 130 mg |
| Other nutrients claimed (e.g. Calcium, Vitamin A, Vitamin C) | | | |

*1kcal = 4.2kJ

** As reconstituted according to label directions

5. Small Packaging

A nutrition information panel display will not be required on a packaging that has a total surface area of less than 100 square centimetres, provided that the food label does not bear nutrient claims or other nutrition information. However, it is necessary to include in the label a statement of the quantity of each nutrient in respect to any nutrition claim that is made. A statement of the energy yield of the food is also required in the case of a claim that the food is free of sugar or where there is a claim with respect to the energy value of the food.

Nutrient Analysis and Nutrient Verification Criteria

1. Methods of Nutrient Analysis

To ensure that the nutrient information declared is accurate and consistent, the following method is recommended:

Direct chemical analysis using official methods of AOAC (Association of Official Analytical Chemists) and/or alternative methods shown to be equivalent to AOAC official methods;

A list of Singapore Accreditation Council-Singapore Laboratory Accreditation Scheme (SAC-SINGLAS) accredited laboratories can be found at the following link:

<http://www.sac-accreditation.gov.sg>

Glycemic Index (GI) testing should be performed using an in-vivo GI testing according to the SAC-SINGLAS Technical Notes FFT01-General criteria for testing of Health Related Properties of Food supported ISO 26642:2010(E) at an accredited laboratory.

For reference, the Glycemic Index (GI) classification is Low : ≤ 55 ; Medium : 56 – 69 ; High : ≥ 70

2. Nutrient Verification Criteria

The Health Promotion Board and the Agri-Food and Veterinary Authority of Singapore will follow up on cases of misrepresentation of the nutrition information on any food product.

Reports obtained through the forms of analysis outlined in Section 1, as well as product recipes, ingredient listing and a sample of the food product are to be submitted on request to Healthy Food Products Department for verification. Each product report shall include the following information:

- i) Name of food product
- ii) Analysis of declared nutrients
- iii) Method of analysis
- iv) Name and address of laboratory or company, which conducted the analysis and
- v) Contact name and telephone number of the person from the food company and representative.

Declared nutrition information must be based on the composition of the food product in the form in which they are packaged (e.g. solid or liquid).

The variance between the declared value and analysed value has to be within 20%.

(For reference to calculation example, please see section on Nutrient Claim Verification, page 10)

Nutrient Claim Verification

A. DEFINITIONS

1. Nutrient Claim

A nutrient claim **suggests/implies** that a food has a **nutritive property**. This property may be general or specific and it can be stated positively or negatively. This property may refer to:

- i) Energy
- ii) Salt, sodium or potassium
- iii) Amino acids, carbohydrates, cholesterol, fats, fatty acids, dietary fibre, protein, starch or sugars
or
- iv) Any other nutrients.

2. Quantity Basis for Nutrient Claims

The quantity may be stated as 'per serving', 'per 100 g', 'per 100 ml' or 'per 100 kcal'.

3. Reference Foods

A 'reference food' is defined as one of the following:

- i) The regular product which has been produced for a significant period by the manufacturer making the nutrient claim or
- ii) A weighted average of an industry norm for that particular type of food or
- iii) A food whose composition is determined by reference to published food composition tables.

4. 'Meal-type' Products

A 'meal-type' product is a food that:

- Is represented or promoted as a quick and easy alternative to a prepared meal or light meal. Typically, it is already part-cooked to the point where it needs only to be heated before serving or ready for consumption. It is commonly known as, a breakfast, lunch, dinner, meal, main dish, quick-bite, ready-to-go meals or pizza/pasta.

5. Foods that are Naturally Low or High in a Nutrient

Many foods are naturally low or high in particular nutrients. Fruit, for example, is high in fibre. When making claims, such foods should be labelled as 'a naturally high/low (nutrient) food'.

Claims of this type shall apply to a class of foods rather than to a particular food. The claim shall be made only to a class of foods and not a specific brand of food.

B. NUTRITION INFORMATION PANEL

A nutrition information panel contains nutrient information, which helps consumers assess the nutritive value of a given food. A nutrition information panel must accompany any nutrient claim. Please refer to the section on nutrition information panel for further information.

C. NUTRIENT CLAIMS VERIFICATION

1. Methods of Nutrient Analysis

To ensure that the nutrient information declared is accurate and consistent, the following methods are recommended:

Direct chemical analysis using official methods of AOAC and/or alternative methods shown to be equivalent to AOAC official methods, or

Glycemic Index (GI) testing should be performed using an in-vivo GI testing according to the SAC-SINGLAS Technical Notes FFT01-General criteria for testing of Health Related Properties of Food supported ISO 26642:2010(E) at an accredited laboratory.

For reference, the Glycemic Index (GI) classification is Low : ≤ 55 ; Medium : 56 – 69 ; High : ≥ 70

2. Sampling

At least three sample units should be drawn from different batches at random. These can be analysed as a composite or separately. If the samples are analysed separately, the test results will be averaged to give a mean result. Sampling should be done on the final product at the point closest to the consumer. The size of a sample unit will vary, depending upon the nutrient analysed, the methodology used and the food itself. On average, a 200 g sample may be enough.

The production lot should be representatively sampled and analysed by trained staff using recognised methods of measurement. The analyst may determine how best to collect and analyse products to ensure accuracy of the declared values. If the analysis is done outside Singapore, the sampling requirements should still meet the above requirements.

3. Nutrient Verification Criteria

Reports obtained through the forms of analysis outlined in Section 1, as well as product recipes, ingredient listing and a sample of the food product are to be submitted on request to Healthy Food Products Department for checking. Each product report shall include the following information:

- i) Name of food product
- ii) Analysis of declared nutrients
- iii) Method of analysis
- iv) Product recipe (ingredient listing in descending order)
- v) Name and address of laboratory or company, which conducted the analysis and
- vi) Contact name and telephone number of person from the food company and representative.

The stated nutrition information must be based on the composition of the food product in the form in which they are packaged (e.g. solid or liquid).

Nutrient Claim Verification

3.1. Verification Criteria for Nutrients with a Labelled Claim

If the labelled claim says that the nutrient content meets the *minimum* requirement, then the actual nutrient content must be *at that level or higher*, and not more than 20% difference from the stated nutrient content.

If the label says that the nutrient content is not more than the *maximum* allowed, then the actual nutrient content must be *at that level or lower*, and not more than 20% difference from the stated nutrient content.

3.1.1. Definitions

For guidelines with a *minimum* requirement

(e.g. A specific nutrient must be present in amount X or higher. One example is High in dietary fibre):

- The stated nutrient content and the tested value must meet the minimum value.
- The stated nutrient content must not be more than 20% difference from the analysed value.

Figure 3 Examples of 'High' Claims

| Claim | Guideline /100 g | Declared value* (What is stated on the packaging /100 g) | Analysed value (Actual content) | Criteria | | Acceptable |
|----------------------------|------------------|--|---------------------------------|---|--|------------|
| | | | | Does the analysed value meet the guideline? | Is the declared value within 20% difference from analysed value? | |
| i) High in dietary fibre | ≥ 6 g | 6 g | 6 g | ✓ | ✓ | ✓ |
| ii) High in dietary fibre | ≥ 6 g | 6 g | 5.6 g | x | ✓ | x |
| iii) High in dietary fibre | ≥ 6 g | 7g | 6 g | ✓ | ✓ | ✓ |
| vi) High in dietary fibre | ≥ 6 g | 8 g | 6 g | ✓ | x | x |

i) Analysed value meets the guideline and declared value is 100% of the analysed value

ii) Analysed value does not meet the guideline

iii) Analysed value meets the guideline and not more than 20% difference from the declared value.

iv) Analysed value meets the guideline but declared value is more than 20% of the analysed value

Calculation Example of 20% variance

Analysed value = 6g / 100g, Declared value = 7g / 100g

Difference of analysed value and declared value = x
 = 1g / 100g

% difference = x / analysed value x 100
 = 1/6 x 100
 = 16.7%

Nutrient Claim Verification

4 Misrepresentation

All labels should comply with the Food Regulations.

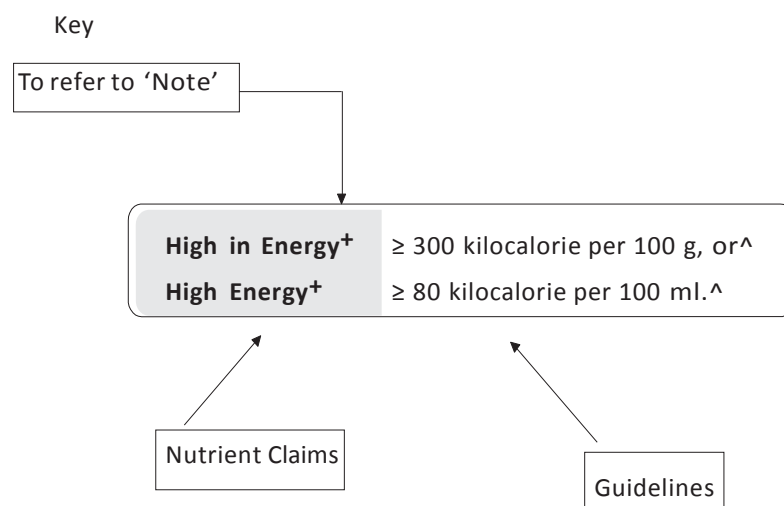
5 Advertisements

The Food Regulations prohibit the use of misleading statements in claims made by food manufacturers or marketers.

Guidelines for Nutrient Claims

The following tables recommend the guidelines for making nutrient claims for each of the following nutrients:

- Energy
- Protein
- Carbohydrate
- Sugar
- Dietary fibre
- Total fat
- Fatty acids
- Cholesterol
- Sodium / Salt and
- Vitamins / Minerals
- Low Glycemic Index



Guidelines for Nutrient Claims

1. Energy[#]

| Nutrient Claim | Guideline |
|--|---|
| Energy Free Calorie Free | <ul style="list-style-type: none"> - ≤ 1 kilocalorie per 100 g / 100 ml, or - ≤ 5 kilocalorie per serving |
| Source of Energy | <ul style="list-style-type: none"> - ≥ 100 kilocalorie per serving [^] |
| High in Energy ⁺ High Energy ⁺ | <ul style="list-style-type: none"> - ≥ 300 kilocalorie per 100 g, or [^] - ≥ 80 kilocalorie per 100 ml [^] |
| Low Energy Low Calorie Lite in Energy Light in Energy Light in Calorie | <ul style="list-style-type: none"> - ≤ 8 kilocalorie per 100 ml for beverages (ready for consumption) and ≤ 20 kilocalorie per 100 ml for other liquid food, or - < 40 kilocalorie per serving, or - ≤ 40 kilocalorie per 100 g |
| Light Dinner Lite Dinner Light Meal Lite Meal | <p data-bbox="608 1133 826 1162"><u>Meal Type Product</u></p> <ul style="list-style-type: none"> - ≤ 120 kilocalorie per 100 g, or - ≤ 300 kilocalorie per serving |
| Less Energy Less Calorie Lower in Calorie Reduced Energy Calorie-Reduced | <ul style="list-style-type: none"> - ≥ 25% less energy than the reference food* |
| More / Increased / Fortified / Enriched / Added Energy | <ul style="list-style-type: none"> - ≥ 25% more energy than the reference food* |

Guidelines for Nutrient Claims

Note:

When using the 'per serving' claim, the food would have to meet the requirements for 'per 100 g' (solid) or 'per 100 ml' (liquid).

- ^ The recommended quantity of food to be consumed per day must provide ≥ 300 kilocalories.
- + This claim can only be used with 'formulated supplementary sports food' and 'meal replacement'.
- * A statement must be included to compare the energy content of the subject food to the reference food.
- # If a food is naturally high or low in energy without any special processing to increase or lower the energy / calorie content, the food is to be labelled with the word 'naturally' (e.g. *Cider vinegar, a naturally calorie-free food*).

Definitions:

'Formulated supplementary sports food' - A food or mixture of foods formulated to help sports people achieve specific nutritional goals, such as, regaining strength.

'Meal replacement' - A product intended as a complete meal, containing all of the basic nutrients and calories, i.e. essential amino acids, vitamins, minerals, carbohydrate, fats, protein and dietary fibre, which are considered important for daily nutritional needs.

Guidelines for Nutrient Claims

2. Protein

| Nutrient Claim | Guideline |
|---|---|
| Source of Protein Contains Protein | <ul style="list-style-type: none"> - ≥ 10 g of protein per day and ≥ 3 g of protein per 100 kcal, - ≥ 5 g of protein per 100 g, or - ≥ 2.5 g of protein per 100 ml, or - ≥ 5 g of protein per serving |
| Good Source of Protein High in Protein Rich in Protein Excellent Source of Protein | <ul style="list-style-type: none"> - ≥ 10 g of protein per day and ≥ 5 g of protein per 100 kcal, - ≥ 10 g of protein per 100 g, or - ≥ 5 g of protein per 100 ml, or - ≥ 10 g of protein per serving |
| Low Protein | <ul style="list-style-type: none"> - $< 5\%$ kilocalories from protein |
| Reduced Protein | <ul style="list-style-type: none"> - $\geq 25\%$ less protein than the reference food* |
| More / Increased / Fortified / Enriched / Added Protein | <ul style="list-style-type: none"> - $\geq 25\%$ more protein than the reference food* |

Guidelines for Nutrient Claims

Note:

When using the 'per serving' claim for solid food, the food would also have to meet the requirements for:

- 'per 100 kcal'
- 'per day'
- and 'per 100 g (solid)'

When using the 'per serving' claim for liquid food, the food would also have to meet the requirements for:

- 'per 100 kcal'
- 'per day'
- and 'per 100 ml (liquid)'

When using the 'per 100 g' or 'per 100 ml' claims, the food would also have to meet the requirements for:

- 'per 100 kcal'
- and 'per day'

* A statement must be included to compare the protein content of the subject food to the reference food.

Guidelines for Nutrient Claims

3. Carbohydrate

| Nutrient Claim | Guideline |
|--|---|
| Source of Carbohydrate Contains Carbohydrate | - > 10 g carbohydrate per 100 g |
| Low in Carbohydrate Low Carbohydrate | - ≤ 10 g carbohydrate per 100 g, or - ≤ 2 g carbohydrate per serving |
| Reduced Carbohydrate Carbohydrate-Reduced | - ≥ 25% less carbohydrate than the reference food* |
| More / Increased / Fortified / Enriched / Added Carbohydrate | - ≥ 25% more carbohydrate than the reference food* |

Note:

When using the 'per serving' claim, the food would also have to meet the requirements for 'per 100 g' (solid).

* A statement must be included to compare the carbohydrate content of the subject food to the reference food.

Definition:

Carbohydrates - are polyhydroxy aldehydes, ketones, alcohols, acids, their simple derivatives and their polymers having linkages of the acetal type. They may include sugars such as monosaccharides (e.g. glucose), disaccharides (e.g. sucrose), sugar alcohols (e.g. isomalt, lactitol, maltitol, maltitol syrup, mannitol, sorbitol and xylitol), polydextrose and starch.

Guidelines for Nutrient Claims

4. Sugar[#]

| Nutrient Claim | Guideline |
|---|---|
| No Added Sugar Without Added Sugar | - no sugars or ingredients with added sugar, honey, malt and malt extract, with the exception of sugar alcohols, are added during processing |
| Unsweetened | - no sugars or ingredients with added sugar, honey, malt, malt extract, sweetening substances or sugars alcohols, are added during processing |
| Sugar Free Free of Sugar Lactose Free | - ≤ 0.5 g sugars per 100 g or 100 ml ⁺ <u>Meal Type Product</u> - ≤ 0.5 g sugars per serving ⁺ |
| Low Sugar Low in Sugar Lite in Sugar Light in Sugar | - ≤ 5 g sugars per 100 g ⁺ , or - ≤ 2.5 g sugars per 100 ml ⁺ , or - ≤ 2 g sugars per serving ⁺ |
| Less Sugar Lower Sugar Lower in Sugar than ... Reduced Sugar | - $\geq 25\%$ less sugar than the reference food* |

Guidelines for Nutrient Claims

Note:

When using the 'per serving' claim, the food would also have to meet the requirements for 'per 100 g' (solid) or 'per 100 ml' (liquid).

⁺ Sugar alcohols may be considered in these guidelines.

^{*} A statement must be included to compare the sugar(s) levels of the subject food to the reference food.

[#] If a food is naturally low in sugar without any special processing to lower the sugar content, the food is to be labelled with the word 'naturally' (*e.g. Cider vinegar, a naturally sugar-free food*).

Definition:

Sugars - Simple carbohydrates, that are molecules of either single sugar units (monosaccharides) or pairs of those sugar units (disaccharides) bonded together, including

- hexose monosaccharides and disaccharides, e.g. dextrose, fructose, sucrose and lactose
- starch hydrolysate
- glucose syrups, maltodextrin and similar products
- products derived at a sugar refinery
- icing sugar, invert sugar, fruit sugar syrup.

Sweetening substances - Non-nutritive or artificial sweeteners such as saccharin, aspartame, acesulfame-K and sucralose and steviol glycosides.

Guidelines for Nutrient Claims

5. Dietary Fibre

| Nutrient Claim | Guideline |
|---|--|
| Source of Dietary Fibre Contains Dietary Fibre | - ≥ 1.5 g per 100 kcal, or - ≥ 3 g per 100 g, or - ≥ 3 g per 100 ml |
| High in Dietary Fibre High Source of Dietary Fibre Good Source of Dietary Fibre Fibre-Rich | - ≥ 4 g per serving, or - ≥ 3 g per 100 kcal, or - ≥ 6 g per 100 g, or - ≥ 6 g per 100 ml |
| More / Increased / Fortified / Enriched / Added Dietary Fibre | - $\geq 25\%$ more dietary fibre than the reference food* |

Note:

When using the 'per serving' or 'per 100 kcal' claim, the food would also have to meet the requirements for 'per 100 g' (solid) or 'per 100 ml' (liquid).

* A statement must be included to compare the dietary fibre content of the subject food to the reference food.

Definition (by the Codex Alimentarius Commission):

Dietary fibre means carbohydrate polymers with ten or more monomeric units, which are not hydrolysed by the endogenous enzymes in the small intestine of humans and belong to the following categories:

- Edible carbohydrate polymers naturally occurring in the food as consumed,
- carbohydrate polymers, which have been obtained from food raw material by physical, enzymatic or chemical means and which have been shown to have a physiological effect of benefit to health as demonstrated by generally accepted scientific evidence to competent authorities,

synthetic carbohydrate polymers which have been shown to have a physiological

Guidelines for Nutrient Claims

6. Total Fat[#]

| Nutrient Claim | Guideline |
|--|--|
| Fat Free Contains No Fat Free of Fat | - ≤ 0.15 g fat per 100 g or 100 ml of food <u>Meal Type Product</u> - ≤ 0.5 g of fat per serving |
| Low Fat Low in Fat Light in Fat Lite in Fat | - ≤ 3 g fat per 100 g, or - ≤ 1.5 g fat per 100 ml |
| Reduced Fat Lower Fat Reduced in Fat Lower in Fat Less Fat than... A certain % less | - ≥ 25% less fat than the reference food* |
| Lean Meat | - < 10 g total fat, < 4 g saturated fat, and < 95 mg cholesterol per 100 g of food |
| Extra Lean Meat | - < 5 g total fat, < 2 g saturated fat, and < 95 mg cholesterol per 100 g of food |

Note:

Claims stating or implying that a product is of a certain percent fat free (e.g. 20% fat free) are considered misleading unless the product qualifies as a 'fat free' or 'low fat' product. .

* A statement must be included to compare the total fat content of the subject food to the reference food.

[#] If a food is naturally low in fat without any special processing to lower its fat content, then the food is to be labelled with the word 'naturally' (e.g. *Broccoli, a naturally fat-free food*).

Guidelines for Nutrient Claims

7. Fatty Acids[#]

| Nutrient Claim | Guideline |
|--|---|
| Saturated Fat Free Free of Saturated Fat | - ≤ 0.5 g of saturated fatty acids per 100 g, and $\leq 1\%$ of the total fat is <i>trans</i> fatty acids |
| Low Saturated Fat Low in Saturated Fat | - ≤ 1.5 g saturated fats per 100 g, and $\leq 10\%$ of kilocalories from saturated fats, or - ≤ 0.75 g of saturated fats per 100 ml, and $\leq 10\%$ of kilocalories from saturated fats <i>Trans</i> fatty acids should be counted as saturated fatty acids for this claim |
| A certain % less Reduced in Saturated Fat Lower in Saturated Fat Reduced Saturated Fat | - $\geq 25\%$ less saturated fat than the reference food* <i>Trans</i> fatty acids should be counted as saturated fatty acids for this claim |
| Contains Polyunsaturated Fats Source of Polyunsaturates (or Polyunsaturated Fatty Acids or Polyunsaturates) Presence of Polyunsaturates | - $> 40\%$ total fat shall be polyunsaturated fatty acids, $< 20\%$ total fat shall be saturated fatty acids and $> 25\%$ kilocalories shall be derived from fat |
| High in Polyunsaturated Fats (or Polyunsaturated FattyAcids or Polyunsaturates) | - $> 40\%$ total fat shall be polyunsaturated fatty acids, $< 20\%$ total fat shall be saturated fatty acids and $> 50\%$ kilocalories shall be derived from fat |
| Increased Polyunsaturated Fats More Polyunsaturated Fats | - $\geq 25\%$ more polyunsaturated fatty acids than the reference food* |

Guidelines for Nutrient Claims

| Nutrient Claim | Guideline |
|--|--|
| Contains Monounsaturated Fats Source of Monounsaturates (or Monounsaturated Fatty Acids or Monounsaturates) Presence of Monounsaturates | - > 40% total fat shall be monounsaturated fatty acids, <20% total fat shall be saturated fatty acids and > 25% kilocalories shall be derived from fat |
| High in Monounsaturated Fats (or Monounsaturated Fatty Acids or Monounsaturates) | - > 40% total fat shall be monounsaturated fatty acids, <20% total fat shall be saturated fatty acids and > 50% kilocalories shall be derived from fat |
| Increased Monounsaturated Fats More Monounsaturated Fats | - ≥ 25% more monounsaturated fatty acids compared with reference food* |
| Trans Fat Free Free of Trans Fat | - < 0.5 g of trans fatty acids per 100 g |

Note:

Claims stating or implying that a product is of a certain percent saturated fat free (e.g. 20% saturated fat free) are considered misleading.

* A statement must be included to compare the fatty acids content of the subject food to the reference food.

If a food is naturally high or low in fatty acids without any special processing to increase or lower the fatty acids content, then the food is to be labelled with the word 'naturally' (e.g. *Broccoli, a naturally saturated fat-free food*).

Definitions:

Monounsaturated fatty acids - Fatty acids that contain one double bond between carbon atoms, e.g. palmitoleic acid and oleic acid.

Polyunsaturated fatty acids - Fatty acids that contain two or more double bonds between carbon atoms, e.g. linoleic acid and linolenic acid.

Guidelines for Nutrient Claims

8. Cholesterol[#]

| Nutrient Claim | Guideline |
|---|--|
| Cholesterol Free No Cholesterol Free of Cholesterol | <u>Food that are derived solely from plant source</u> - 0 mg of cholesterol per 100 g food <u>Other food products</u> - < 5 mg of cholesterol per 100 g food, and meets the conditions for a 'low saturated fatty acids' food |
| Low Cholesterol Light in Cholesterol Low in Cholesterol Lite in Cholesterol | - ≤ 20 mg of cholesterol per 100 g, and ≤ 1.5 g of saturated fats per 100 g food, and ≤ 10% of kilocalories from saturated fats ⁺ , or - ≤ 10 mg of cholesterol per 100 ml and ≤ 0.75 g of saturated fats per 100 ml, and ≤ 10% of kilocalories from saturated fats ⁺ |
| A certain % less Reduced in Cholesterol Lower in Cholesterol Reduced Cholesterol | - ≥ 25% less cholesterol than the reference food* |

Note:

Claims stating or implying that a product is of certain percent cholesterol-free (e.g. 20% cholesterol free) are considered misleading.

+ *trans* fatty acids must be counted (or calculated) as saturated fatty acids for this claim.

* A statement must be included to compare the cholesterol content of the subject food and the reference food.

[#] If a food is naturally low in cholesterol without any special processing to lower the cholesterol content, then the food is to be labelled with the word 'naturally' (e.g. *Canola oil, a naturally cholesterol-free food*).

Guidelines for Nutrient Claims

9. Sodium / Salt[#]

| Nutrient Claim | Guideline |
|---|---|
| No Added Salt No Salt Added Unsalted | - No sodium chloride, sodium compounds, or any ingredient containing added sodium chloride or other sodium compounds, should be added to the food |
| Salt Free Sodium Free | - ≤ 5 mg sodium per 100 g |
| Low in Salt Low Sodium Light in Salt Low Salt Light in Sodium Lite in Salt Low in Sodium Lite in Sodium Lightly Salted | - ≤ 120 mg sodium per 100 g |
| Very Low in Salt Very Low in Sodium | - ≤ 40 mg sodium per 100 g |
| A certain % less Reduced Salt Lower in Salt Lower in Sodium | - $\geq 25\%$ less sodium compared to reference food* |

Note:

Claims stating or implying that a product is of a certain percent sodium/salt free (e.g. 20% sodium / salt free) are considered misleading.

* A statement must be included to compare the sodium/salt content of the subject food to the reference food.

[#] If a food is naturally low in sodium without any special processing to lower the sodium content, then the food is to be labelled with the word 'naturally' (e.g. *Lettuce, a naturally sodium-free food*).

Definition:

Salt is sodium chloride.

Guidelines for Nutrient Claims

10. Vitamins / Minerals

Source / Presence / Contain

10.1. No claims based on the **presence** of a vitamin or a mineral or implying the **presence** of a vitamin or a mineral in a food shall be made on the label unless the reference quantity for that food as laid down in the Food Regulations contains at least one-sixth of the daily allowance as laid down in Figure 5 for the relevant vitamin or mineral.

Excellent Source / Enriched / Fortified / Ennobled / Vitaminised / High / Rich /Good/Added with

10.2. No label shall claim that any article of food is **enriched, fortified, ennobled, vitaminised** or in any way imply that the article is an **excellent source, high or rich** in one or more vitamins or minerals unless the reference quantity for that food as laid down in the Food Regulations contains not less than 50% of the daily allowance as laid down in Figure 5 for the relevant vitamin and mineral.

10.3. When vitamin A or vitamin D or a mineral is added to a food, the addition must not increase the vitamin A content to more than 750 mcg of retinol activity per reference quantity for that food as specified in the Food Regulations, nor increase the content of vitamin D to more than 10 mcg of cholecalciferol or of any mineral to more than three times the daily allowance (as specified in Figure 5 for that mineral) per reference quantity for that food as specified in the Food Regulations.

(The information provided in the vitamins/minerals section was adapted from the Sale of Food Act, Cap. 283, Regulation 11).

11. Low Glycemic Index

Foods claiming to have Low Glycemic Index

- Must have a GI value* of less than 55.
- Must meet all the HCS nutrient guidelines as specified in the respective categories.

**The cut-off values for the classification of low, medium and high GI are standardised internationally (ISO 26642:2010).*

Guidelines for Nutrient Claims

Figure 5
Daily allowances of vitamins and minerals

| Substances | To be Calculated as | Daily Allowance |
|--|------------------------------------|-----------------|
| 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, nicotine 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 |
| Vitamin E, α -tocopherol compounds | Milligrams of α -tocopherol | 10 mg |
| Calcium | Milligrams of calcium | 800 mg |
| Iodine | Micrograms of iodine | 100 mcg |
| Iron | Milligrams of iron | 10 mg |
| Phosphorus | Micrograms of phosphorus | 800 mg |

Guidelines for Nutrient Claims

Figure 6
Vitamins / mineral claims

| Vitamins / Minerals Claims | Criteria to Claim |
|--|--|
| Source/Contain/added with/with/presence of a vitamin / mineral | Reference quantity* should contain at least 1/6 of the daily allowance |
| Excellent source/Enriched/Fortified/Ennobled/Vitaminised/High/Rich/ of a vitamin / mineral | Reference quantity* should contain at least 50% of the daily allowance |

* As specified in Figure 7 (as specified in the Food Regulations)

Figure 7
Reference Quantity

| Food | 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 |

Aids to Calculation

International Units (IU)

To convert IU to:

- RE (Retinol equivalents of vitamin A): from animal sources, divide by 3.33; and from vegetables and fruit, divide by 10.
- mcg vitamin D: divide by 40 or multiply by 0.025.
- mg α -tocopherol: divide by 1.5.

Sodium

1 g of salt (sodium chloride) contains 400 mg of sodium.

Food Energy

To convert food into kilocalories:

| | |
|--------------|----------------------|
| Fat | 1 g = 9 kilocalories |
| Carbohydrate | 1 g = 4 kilocalories |
| Protein | 1 g = 4 kilocalories |

Health Claims

Types of health claims as defined under the “Guidelines for Use of Nutrition and Health Claims” established by the Codex Alimentarius Commission

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.

Please refer to AVA’s A Guide to Food Labelling and Advertisements for the list of acceptable nutrient function claims, criteria for use of nutrient specific diet-related reduction of disease risk health claims and further information.

²include 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.

Healthier Choice Symbol

The Healthier Choice Symbol (HCS) is a symbol that Singaporeans can relate to for healthier packaged foods. It is a part of the Nutrition Labelling Programme and is intended to provide point-of-sale information to help people make informed food choices.

Dietary intake has been shown to be associated with the development of several chronic degenerative diseases, namely coronary heart disease, hypertension, stroke, diabetes mellitus and certain cancers. These are the current health concerns in Singapore and can be prevented by changing dietary practices.

In line with the policy of the National Healthy Lifestyle Programme, the Ministry of Health (MOH) implemented the Nutrition Labelling Programme in 1998 to encourage the food industry to display the nutrition information panel and to educate consumers in reading food labels. The Health Promotion Board (HPB), a statutory board of the MOH, currently administers this Nutrition Labelling Programme.

Food products may carry the HCS if they meet nutritional standards set by HPB. Evaluation will be based on the nutritional values; particularly fat, saturated fat, sodium and dietary fibre, as well as the contribution of that product towards a balanced diet.

Application Procedures

Application will be via the HCS online system. The general steps are as follows:

Step 1 - Registration

- i) Please select a representative from your company as Organisation Administrator (OA) and register your company in Partners Connect (<https://connect.hpb.gov.sg/pc>). The role of an OA is to approve, reject or amend the role (staff, witness or bearer) of fellow colleagues and is the first person to register in Partners Connect.
- ii) The OA will receive their password within 5 working days of application. Please change the password during first log in.
- iii) Please select a witness and bearer to register in Partners Connect. They will receive their password within 5 working days. A notification email will be sent to the OA to approve or reject their colleagues. The OA can do so by clicking "worklist", where they can see the list of colleagues registered in Partners Connect.
- iv) There is no limit to the number of staff registering in Partners Connect. However there can only be 1 witness and 1 bearer. The rest will be staff. The OA can be witness, bearer or staff.

Step 2 – Submit your application

- i) Click on "e-services>>HCS online". You may submit your product's information for stages 1 to 3 at a go during your application.
- ii) There are 4 stages to the completion of your HCS application
 - a. Product Category – Stage 1
 - Submission of product description and product details
 - Classification of product category and sub category
 - b. Nutrient Values/Lab Report – Stage 2
 - Submission of nutrient analysis report
 - Once stage 2 is approved, you may download the HCS logo from the screen.
 - c. Product Label Artwork – Stage 3
 - Submission of artwork
 - d. Licence Agreement – Stage 4
 - Generation of Licence Agreement if product is approved at stage 3

Application Procedures

iii) The status of each stage is represented by colour buttons.

Green – Approved

Yellow/Amber – Pending for approval/amendment required

Red - Rejected

iv) Once the artwork has been approved, the licence agreement (LA) will be generated at stage 4. HPB officer who is the bearer and the witness will endorse the LA. An email notification will be sent to the company bearer to endorse the LA. After the company bearer endorse, an email notification will be sent to the company witness to endorse the LA. Once the company witness endorse, the application process will be completed.

You may download the user manual guide at this link (<http://www.hpb.gov.sg/HOPPortal/health-article/2780>).

1. Approving Process and Renewal

Each food group has a set of nutritional guidelines and each product will be evaluated according to these guidelines. If the nutritional guidelines are met, the company will be required to send in the product packaging artwork for approval. Once the artwork is approved, the company will then enter into a licence agreement with HPB.

Approved products are randomly selected for analysis annually to ensure that they continue to meet the nutritional guidelines. Analysis will be carried out by independent laboratories using official methods of AOAC and / or alternative methods shown to be equivalent to that of AOAC. Analytical results are to be compared against the guidelines for acceptability and food companies will be notified of their results. Any food companies whose products fail to meet the nutritional guidelines will be investigated. Finally, the approved products, which no longer meet the nutritional guidelines, will be disqualified from the Programme.

2. Procedures for Renewal of Licence Agreement

- i) The LA is valid for 2 years. Thus a month before the LA is expire, an email notification will be send to the company to indicate their interest in renewing the LA via the HCS online application system. A second email (reminder email) will be sent out 14 days before the LA expires.
- ii) Company will be required to indicate if there is a change in formulation and the products that they are keen to renew in the Licence Renewal tab. For products that have a change in formulation, the company would need to apply them as a new application.
- iii) After which, the endorsement of the LA will be as per Application procedures, Step 2 (iv).
- iv) For companies which fail to indicate their interest to renew, after the LA expired, the products will be automatically remove from the database by the system.

3. Procedures following Expiry / Termination of Licence Agreement

Upon the expiry or termination of the licence agreement, food companies will be given a period of six calendar month to remove the HCS from the products.

If companies fail to remove the HCS from the products within six calendar month, the Board will take legal actions against them.

4. Failure to Comply with Licence Agreement and Misuse of the HCS

- Food companies are expected to adhere strictly to all rules and guidelines.
- If a company fails to comply, a warning in written form will be issued to inform the company to take the necessary action.
- If the recommended actions are not carried out within 7 working days, the Board reserves the rights to terminate the licence agreement.
- Upon termination of the licence agreement, the company will no longer hold the right to use the HCS.

5. Procedures for Approval of Advertising Material

- 1) All artworks using or with reference to the HCS must be submitted to the Health Promotion Board, prior to printing, distribution, publishing or broadcasting.
- 2) The following materials are to be submitted for approval:

| | |
|--------------------------|---|
| TV Commercial | : Storyboard including graphic illustration and, supertitles |
| Radio | : Scripts |
| Printed Material | : Final artwork printout (original, in full colour) (e.g. press/magazine advertisement, leaflets) |
| Product Packaging | : Final artwork printout (original, in full colour) |

3) All advertisements are required to comply with the requirements of the Food Regulations. A “Guide on Food Labelling and Advertisement” to guide industry members in ensuring that their food labels and advertisements comply with the requirements of the Food Regulations can be found in the AVA website (www.ava.gov.sg).

4) The advertisements submitted to the Health Promotion Board will be reviewed in a timely fashion. Please submit the advertisements at the ‘Advertising Material’ tab (stage 5) of the HCS online application system.

The Board will endeavour to give notice of any amendments in 5 working days upon receipt of the submitted materials.

5) All materials submitted are not returnable and are kept for the Board’s records.

6) A final approved, printed packaging (for distribution) must be submitted for the Board’s records.

Licence Agreement

Companies entering into the licence agreement with HPB will agree to:

- i) the non-exclusive use of the HCS by any one company for any one product
- ii) no sub-licensing
- iii) be responsible for monitoring the legal use of the HCS on licensed products
- iv) display the nutrition information panel, in the format recommended by HPB
- v) seek HPB's approval with regard to the use of HCS in all advertising and promotional materials.

The licence will be valid for the duration of two years (24 months) upon the execution of the licence agreement. At the end of the contract year, your company's products will be re-evaluated based on the latest criteria*. If these criteria are met, the licence may be renewed for another two years.

All food companies applying for the Healthier Choice Symbol are expected to adhere strictly to the rules and guidelines. If a company fails to comply, a warning in written form will be issued to inform the company to take the necessary action.

* *The nutritional guidelines may be amended to reflect the latest scientific updates.*

Symbol Labelling & colour Guide

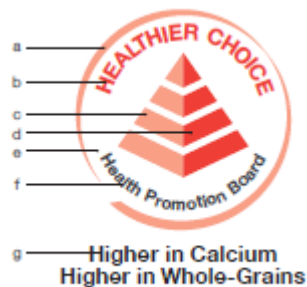
Symbol Labelling and Presentation


- i) The Symbol must not be distorted, photographically or otherwise.
- ii) The size of the Symbol may vary but the ring of the Symbol should not be smaller than 15 mm in diameter (refer to Colour Guide).
- iii) The Symbol must not touch the brand name on the product to suggest that the product is generic to HPB.
- iv) The Symbol must not cover any essential information on the label.
- v) There must be appropriate amount of clear space around the Symbol. The clear space is determined by the height of the first 2 steps from the tip of the pyramid in the Symbol. This also applies to the Nutrition Information Panel.



Symbol Labelling & Colour Guide

v) The designated colours of the Symbol are



| | | | | | |
|----------|---|---|---|--|---|
| | b, d | a, c | g | f | e |
| |  |  |  |  |  |
| Pantone® | PMS 032 C | 50% PMS 032 C | PMS Black C | 90% PMS Black C | White Base |
| CMYK | 100M 100Y | 50M 50Y | 100K | 90K | |
| RGB | R237 G28 B36 | R245 G149 B121 | R0 G0 B0 | R64 G64 B65 | |

viii) The following statement must always accompany the Symbol:

- a) Statement to qualify the comparison taglines (lower in sugar, lower in sodium, lower in saturated fat, higher in whole-grains, higher in calcium and etc at the bottom of the Symbol

An example of the statement is "25% lower in sugar as compared to regular [range or name of food category]" or any other statement bearing similar meaning.

ix) Under certain circumstances where printing onto the packaging is not feasible, the company will be allowed to paste sticker labels onto the packaging.

x) Companies are responsible for printing their own stickers for the HCS and the nutrition information panel.

xi) The HCS is the copyright of HPB.

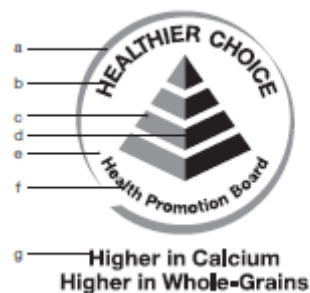
Symbol Labelling & Colour Guide




Use of Non-designated Colours

The use of non-designated colours is strictly prohibited for most packaging. However, in cases of budget constraint, some products may use a one-colour or two-colour Symbol.

In such cases, the company may print the Symbol in one colour on this particular product provided that the product fulfils the guidelines stated below. **All artworks will be assessed individually on a case-by-case basis in addition to the guidelines below.**

The company may print the symbol in black (with the inside circle of the HCS in reversed white) on the product label if:



| | | | |
|----------|---|---|--|
| | b, d, f, g | a, c | e |
| |  |  |  |
| Pantone® | PMS Black C | 50% PMS Black C | White Base |
| CMYK | 100K | 50K | |
| RGB | R0 G0 B0 | R156 G155 B6155 | |

i) The product packaging is printed in **two colours or less** (excluding white) of which one of the colour is **black (100% K) and**

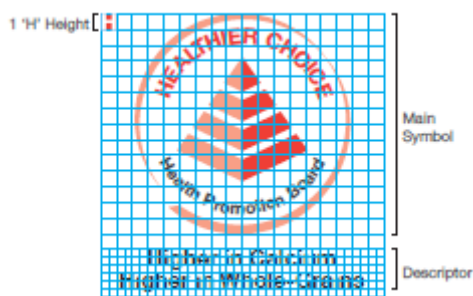
ii) The Pantone Red 032 and any of the approved variations* is not one of the colours printed on the packaging.

* The Symbol can have these variations of the Pantone Red: Pantone colours 186, 192, 199, 206, 485 and 1788. Custom colours may be accepted but the colour samples must be submitted for approval.

Symbol Size Guide

Guide to the Size of the Symbol on Product Packaging

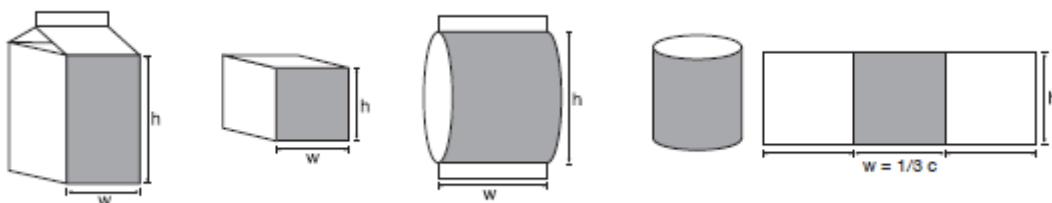
- The preferred location of the Symbol is on the front panel of the product packaging.
- There should not be more than two Symbols per product.
- Text on the Descriptor should be legible on the packaging.



- The display surface area of the packaging is defined as the area of the face of the product where the symbol is placed.

Example:

$$\text{Display Surface Area} = H \times W$$



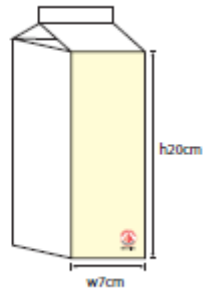
$$H = \text{Height} \quad W = \text{Width} \quad C = \text{Circumference}$$

- The size of the Healthier Choice Symbol should preferably no smaller than 15 mm width when applied on the packaging.
- The minimum size of 15 mm width of the HCS logo should be maintained if the calculations yield smaller than the recommended value.

Example:



The size of the Healthier Choice Symbol (HCS) is determined by the width.



To determine the minimum size of HCS logo width on a packaging:
 $= h + w / 17$
 $= w \times cm$

Example:
Packaging dimensions
 $= h20cm + w7cm / 17$
 $= w1.68cm$

Guidelines on Symbol Usage

Advertising Codes

This section illustrates the guidelines for all packaging, advertising and promotional materials of food products licensed to carry the Symbol. These guidelines are set with the intention of:

governing the appropriate use of the Healthier Choice Symbol

Designing, reviewing of product packaging, advertising and promotional materials involve perceptions and decisions, which are subjective. **The guidelines stated in this part, however, are not intended to limit a creative approach.** However, companies participating in the Healthier Choice Label Programme have to comply with certain guidelines.

General Guidelines

- 1) The guidelines stated here are applicable to all products licensed by the Health Promotion Board that use and make reference to the Healthier Choice Label Programme.
- 2) These guidelines are applicable to all product packaging, advertising, and promotional materials or efforts of any nature and through any media that play a role in influencing consumer perception.
- 3) The Healthier Choice Symbol and the appropriate certification statement must at all times conform to the guidelines as stated in this section and any other recommendations made by the Health Promotion Board.

Responsibility

- 1) **It is the responsibility of participating companies to ensure that their packaging labels and advertising materials do not go against the Food Regulations.**
- 2) While these guidelines are applicable to the company and its advertising and/or other related agencies, the primary responsibility for enforcing and conforming to these standards lies solely with the individual participating company.
- 3) Any violation of these guidelines may result in termination of the participating company's licence to use the Symbol.
- 4) **These guidelines are subject to change according to the Board's scientific positions, government regulations and other circumstances.**

All packaging, advertising and promotional material artworks must conform to the guidelines in effect at the time they are submitted for approval. Should there be any changes made to these guidelines, notification of changes and their effective dates will be sent out to all relevant participating companies.

Guidelines on Symbol Usage

Specifications of the Healthier Choice Symbol

- 1) The **colour and artwork** of the Symbol on the promotional materials will have to **conform to the colour guide**.
- 2) The Symbol must **NOT** be verbally and visually associated with unrelated claims such as 'Fortified with Vitamins and Minerals', 'Low Lactose', 'No Preservatives', 'No Cholesterol' and 'Organic'.

Claims and Promotional Messages

- 1) All claims and information used in relation to the Healthier Choice Label Programme for the promotion and packaging of licensed products must be **factual, accurate and must not be misleading. Evidence such as scientific reports or statistical reports will be required for support of statements or claims.**
- 2) **All possible misconceptions by the consumer of products being 'good' or 'bad', 'healthy' or 'unhealthy' should be avoided.**

The purpose of this Programme is to provide information to consumers in helping them make healthier choices towards a healthier lifestyle, and not to make any negative implications to products which do not meet the Board's Nutritional Guidelines.

- 3) The following statements may be used together with the Symbol in all advertising and promotions.

'*[Product Name]* meets the Nutritional Guidelines of the Healthier Choice Label Programme.'

or

'*[Product Name]* meets the Nutritional Guidelines to qualify for the Healthier Choice Symbol.'

or

'*[Product Name]* meets the Nutritional Guidelines of the Healthier Choice Label Programme administered by the Health Promotion Board.'

or

'*[Product Name]* meets the Nutritional Guidelines set by the Health Promotion Board as a Healthier Choice.'

Guidelines on Symbol Usage

4) The following are examples of statements that are **not** allowed on **all promotional materials**:

- i) ' First (or No. 1) in Singapore to carry the Healthier Choice Symbol', or related claims
- ii) '[*Product Name*] is endorsed by the Heart Promotion Board', or related claims
- iii) ' The one and only product with the Healthier Choice Symbol'

Multiple Product Advertising and Promotions

Products related by brands are often promoted collectively. The following guidelines are applicable to advertisements or promotions of:

Participating (licensed) products with other Participating (licensed) products,

and

Participating (licensed) products with other Non-participating products.

- The joint advertising and promotion of the above two situations are both allowed.
- The acceptance of the participating products must not in any way, direct or implied, be extended to non-participating products shown in the advertisement.

The acceptance of one product by the Board messages must not in any way imply, that it extends to other products, although they are not projected in the advertisement.

Consumers must not be misled into believing that other products manufactured by the company, or within a brand, also meet with the Board's Nutritional Guidelines.

Joint advertisement or promotion of participating products and non- participating products that are packed together must ensure that **only licensed products carry the Healthier Choice Symbol**. For example, free samples (non-participating products) which are wrapped with a participating product must not have the Symbol on their wrapping.

Illustrations

The Healthier Choice Label Programme focuses on promoting a balanced diet and a healthy lifestyle, therefore all illustrations used on artworks for product packaging, advertisements and promotional materials will be considered in this context. Consumer perception of the overall context of materials and illustrations will be reviewed prior to approval.

Questions & Answers

A. Incentive to Participate

1. What are the future plans for the Programme? Food companies need that assurance before they can decide on participating.

The Healthier Choice Label Programme is an on-going programme that aimed at educating the public about healthy eating. Activities will span over a long period of time to sustain the demand and continually increase awareness among consumers.

Since new products are being developed every day and consumers need to know if these new products are healthier choices, it will not be a short-term programme.

2. Will there be sufficient publicity to benefit our company's sales?

Brochures, posters and postcards, TV commercial, press advertisements have been produced and exhibitions and public forums have been held to create and maintain the public awareness on the Healthier Choice Symbol. There will be sustained demand generation efforts from HPB to drive publicity.

3. Why should we join this Programme?

Today's consumers are better educated, more health-conscious and want to know more about what they consume.

A supermarket survey conducted by the Ministry of Health in 1999 showed that 76% of respondents read the Nutrition Information Panel (NIP) and 70% are able to determine nutrient content using the NIP. Furthermore, 68% of shoppers had seen the Healthier Choice Symbol and more than three-quarters responded that they would use the symbol to make informed choices. With public education, we will further enhance consumers' understanding of the Programme and further motivate them to look out for the Healthier Choice Symbol when shopping.

Also, joining the Programme is currently free.

4. What about the healthier choice symbols by other countries? Don't they benefit the consumers just as much?

Symbols found on the packaging of foods that indicate approval from a foreign health programme may spark the interest of consumers and even lead them to expect a certain health standard from these symbols. However, we need to remember that local consumers are not educated about these symbols and do not know the rationale behind them.

By educating the public on the Healthier Choice Symbol, the local consumer will understand the rationale behind it and have confidence in choosing products with the Symbol.

5. Some of my products already carry the overseas health logo. Why should I still need to apply for the Healthier Choice Symbol?

The nutritional standards of overseas health logos are different from those of the Singapore's Healthier Choice Symbol. The standards of our symbol were established to suit the diet of the local population. Also after the

intensive publicity to educate the public on the Healthier Choice Symbol, consumers in Singapore are more aware of our Healthier Choice Symbol than of overseas logos.

B. Approval for Artwork for Product Packaging and Promotional Materials

6. What do we need to submit for product artwork approval? Colour proofs are too expensive to send in. Can we send in the Final Artwork for approval?

A final artwork in colour is acceptable. The exact duplicate of the design as well as the colours allocated for the actual printouts of the packaging are to be submitted for approval before mass production. You are advised that packaging should not be mass printed before approval because should there be any changes required, products may have to be withdrawn and the packaging of these products will then have to be reprinted.

7. Can we have a more specific set of standards for the permitted artwork for packaging and advertising? Can we be informed of the dos and don'ts for our packaging and advertising artwork?

An advertising code for the Healthier Choice Label Programme has been drawn up for your reference. Kindly refer before submitting your artwork for approval. However, please note that the advertising code is written for general issues. There might be other concerns, which have to be evaluated individually. Therefore, please do not carry out printing and distribution until after the Board issues final approval for the artwork.

8. Can I use sticker labels of the Healthier Choice Symbol and Nutrition Information Panel (recommended by the Health Promotion Board) if I am unable to reprint the packaging?

Yes, you can use sticker labels of the Healthier Choice Symbol, as well as for the Nutrition Information Panel. However, you are responsible to print the sticker labels.

C. Nutrient Analysis and Nutrition Information Panel

9. What kind of format for the Nutrition Information Panel is 'acceptable' to the Health Promotion Board for use in the Healthier Choice Label Programme?

The Nutrition Information Panel format recommended by the Health Promotion Board must be used when products carry the Healthier Choice Symbol. The Health Promotion Board's public education efforts include teaching consumers to read the nutrition information based on the Singapore format. Kindly refer to the Nutrition Information Panel portion for the requirements a Nutrition Information Panel should meet.

10. Are overseas laboratory reports for imported products acceptable by the Programme?

If the product is originally produced and packed overseas, the laboratory reports of these products are acceptable as long as the product is analysed by AOAC (Association of Official Analytical Chemists) methods and the laboratory is accredited.

11. What is the information required on the laboratory reports?

Each product report shall include the following information:

- i) Name of food product;
- ii) Analysis of declared nutrients;

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- iii) Method of analysis
- iv) Name and address of laboratory or company which conducted the analysis; and
- v) Contact name and telephone number of the representative from the Food Company.

12. What nutrients do I need to include in the Nutrition Information panel?

For HCS products, you would need to include the 9 core nutrients in the Nutrition information panel. The core nutrients are Energy, Protein, Fat, Saturated Fat, Trans Fat, Cholesterol, Carbohydrates, Dietary Fibre and Sodium.

And if you have made any nutrient claims on your packaging e.g. Enriched with Vitamin C, High in Calcium, please include them in as well.

13. Do I need to submit lab reports for all the nutrients in the nutrition information panel?

The lab report must include the core nutrients as well as additional nutrients relevant to your product category. You may first submit lab report for nutrients that are relevant for the HCS approval. If the product is able to meet the HCS guidelines, you may then submit lab report for the remaining core nutrients.

If you have made any nutrient claims on your packaging e.g. Enriched with Vitamin C, High in Calcium, please submit lab reports for these nutrients as well.

14. Can I submit indirect analysis report instead of lab analysis reports?

Currently, for HCS applications, we only accept lab reports from accredited laboratory using AOAC (Association of Official Analytical Chemists) methods or equivalent.

15. If my product is plant-based, do I need to submit lab analysis report for Cholesterol?

No, you don't need to as they are naturally not present in your product.

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D. Nutritional Guidelines

16. If a product exceeds the guideline for saturated fat but contains a high level of monounsaturated fat, can it still be approved?

No, it will not be approved because there is currently no scientific evidence showing that monounsaturated fat can reduce the harmful effects of saturated fat.

17. Can meat and poultry apply for the Healthier Choice Symbol? Different cooking methods will actually change the nutritional composition.

Yes, cooking methods of meat and poultry would alter the actual fat content of meat consumed. However, there are different cuts of meat which carry different amount of fat. The Healthier Choice Symbol helps consumers identify the lean meat cuts.

18. The animal feed used affects the nutritional content of meat and poultry. If a company participates in the Healthier Choice Label Programme, how can they protect themselves from such fluctuation? How is the Board going to monitor and ensure that the nutritional values of meat and poultry remain the same?

Should the farm change the feed used, the nutrient content of the fresh meat needs to be re-analysed. To ensure the compliance of nutritional standards by the food companies, a yearly submission of laboratory report is required to sustain the continued use of the Healthier Choice Symbol. Nevertheless, there is an allowance of not more than 20% variation in the nutrients reported.

E. Foreign Trade

19. Will there be any problems with distributing products carrying the Healthier Choice Symbol overseas?

To date, there have not been any apparent problems with the distribution of Healthier Choice products overseas. However please check with the food regulators in the country of export.

20. Some products distributed in Singapore carry the 'Pick the Tick' symbol. Can products carry the Healthier Choice Symbol together with other symbols on the packaging?

Yes, the Healthier Choice Symbol may be used with symbols from other similar overseas programmes. However, it is the food company's responsibility to ensure the legal use of overseas symbols on the products in different countries.

F. Registration

21. Can products of the exact same food composition (identical ingredients and manufacturing method) but distributed in different shapes (e.g. pasta and nuts) be considered as one single product?

Yes. Products of the same food composition but different physical shapes can be considered as a single product. However, this will only apply to products marketed under the same brand name. Should the company produce these identical products but market them under different brands, these products will then be viewed as separate products.