COMMENTS RECEIVED FOR THE PHASE 2 CONSULT FOR THE EXTENSION OF NUTRI-GRADE LABELLING REQUIREMENTS AND ADVERTISING PROHIBITIONS TO KEY CONTRIBUTORS OF SODIUM AND SATURATED FAT, AND THE GOVERNMENT'S RESPONSE

1. The Singapore Ministry of Health (MOH) and Health Promotion Board (HPB) announced in August 2024 that we would extend Nutri-Grade labelling requirements and advertising prohibitions ("Nutri-Grade measures for sodium and saturated fat") to key contributors of sodium and saturated fat in the retail setting[1]. These are: salt, sauces and seasonings, instant noodles and cooking oil.

2. Excessive intake of sodium and saturated fat are key risk factors for chronic diseases such as hypertension and hyperlipidaemia, which are rising public health concerns for Singapore. Despite growth in the availability of healthier salt, sauces, seasonings and cooking oil in the market, adoption among consumers and F&B operators remains low. There also continues to be a lack of healthier alternatives for instant noodles. More needs to be done to increase the adoption of healthier alternatives and further spur industry reformulation in these product categories, to reduce Singaporeans' sodium and saturated fat intake.

3. The decision to extend labelling requirements was made after a careful consideration of the industry feedback received during Phase 1 consultations conducted between April and May 2024 on possible regulatory measures, and a review of the international and local evidence in relation to the measures. This includes the positive impact of Nutri-Grade labelling and advertising prohibitions on beverages in lowering Singaporeans' sugar intake.

4. The measures aim to:
   a) Help consumers make more informed, healthier choices by identifying products that are higher in sodium and saturated fat;
   b) Spur industry reformulation; and
   c) Reduce the influence of advertising on consumer preferences.

5. MOH and HPB conducted Phase 2 consultations with stakeholders from 14 October 2024 to 30 November 2024, on the proposed specifications for the Nutri-Grade measures for sodium and saturated fat. The proposed specifications were circulated to over 7000 stakeholders, comprising manufacturers, suppliers, importers, distributors, wholesalers, retailers, F&B operators, associations and the advertising industry.

[1] Retail settings include supermarkets, grocery store, e-commerce platform, vending machines, and settings where the product is provided in the course of providing services (e.g. to patients in hospitals), under a contract (e.g. provided by hotel as part of accommodation), or as part of providing amenities at a place of work (e.g. at office pantries), etc.

Summary of comments

6. MOH and HPB's responses to the key comments raised are set out in **Annex A.** A breakdown of the organisations who provided feedback is found in Table 1 below. The full list of organisations is in **Annex B**.

Table 1. Comments by category

Category	**Number of organisations**
Manufacturers/suppliers	43
Importers/Distributors/Wholesaler	19
Retailers	4
F&B Operators	11
Industry and trade associations	5
Total	**82**

7. MOH and HPB would like to thank all respondents for participating in the consultation. MOH and HPB intends for the Nutri-Grade measures for sodium and saturated fat to come into effect from mid-2027. We will consult the public and industry on the draft provisions for the regulations when ready.

ANNEX A: Responses to key comments raised by respondents

1) Overall comments on the Nutri-Grade extension		MOH/HPB's response
1.1	Some respondents commented that the Nutri-Grade extension would enable F&B businesses and consumers to better understand the nutritional content of ingredients and make healthier decisions when selecting ingredients.	Feedback is noted.
1.2	One respondent suggested that the Nutri-Grade extension should be voluntary at the start, to allow time for testing, refining the measures and developing effective communication messages to consumers.	After careful consideration, our position remains that the Nutri-Grade measures will be mandatory, to fulfil the policy intent of reducing sodium and saturated fat, and address the growing public health concerns with hypertension and hyperlipidaemia. The combination of mandatory labelling and advertising prohibitions, together with public education, has been effective in reducing sugar intake and spurring reformulation in beverages.
1.3	As salt, sauces and seasonings and oil were ingredients to be added to food in small amounts and not consumed directly unlike beverages, some respondents felt that the Nutri-Grade extension to these categories may not be effective. For instance, consumers may use more of the lower-sodium ingredient, which would undermine the intent of the measures. Other respondents felt the application of the measures should consider consumption patterns (e.g. exempting products that are consumed only occasionally or in smaller quantities from measures).	The Nutri-Grade extension is applied to these categories, as they are key contributors to Singaporeans' sodium and saturated fat intake. MOH/HPB's intent is to help consumers make more informed, healthier choices when choosing products in these categories, regardless of whether they consume the entire package or use only small amounts.
1.4	One respondent said that ingredients such as salt and seasoning were essential in cooking, and thus businesses and consumers may continue to use poorly graded products despite the label. The respondent suggested to focus efforts on public education efforts instead.	The Nutri-Grade measures, as applied to beverages, have been effective in shifting consumers' preferences, from Grade C/D products toward Grade A/B products. We hope to see the same trend for these new categories. HPB will also continue our public education efforts to educate consumers and F&B operators to promote healthier diets.

2) Comments on the proposed scope of affected products		MOH/HPB's response
2.1	Some respondents sought clarification on whether the new Nutri-Grade labelling requirements would apply to products sold business-to-business (e.g. products sold to F&B businesses).	The Nutri-Grade extension would apply to prepacked products intended for sale or provision: a) By a retail food business; b) From a vending machine; c) Under a contract together with accommodation, service or entertainment; d) In the course of providing services to patients, children in custody care and prisoners/inmates; e) As part of providing amenities at a place of work (e.g. office pantries). Under sub-para (a), this includes prepacked products sold at variety shops (e.g. physical or online supermarkets), or at F&B establishments (e.g. restaurant selling prepacked bottle of sauce). The following products are not included within the scope of the Nutri-Grade extension (Note: this list is non-exhaustive): i. Business-to-business packages (e.g. carton boxes for transport of products); ii. Prepacked products intended for use by F&B establishments in their preparation of dishes; iii. Non-prepacked products, including salt shakers and open bottles of sauce that are offered by F&B establishments or variety shops, for consumers to use within the retail food premise.
2.2	Some respondents sought clarification if these products were subject to the Nutri-Grade extension: a) Bottled shallots or raw/fried garlic b) Canned or chilled soup (ready-to-serve) c) Cooking kits that come with sauce/seasoning packs, on top of other ingredients such as noodles and rice	**Products (a) to (l) are NOT subject to the Nutri-Grade extension** For (a): Bottled forms of garlic and shallots constitute packed forms of vegetables, and hence are outside the scope of salt, sauces and seasonings, instant noodles and oil.

	d) Confectionery products
	e) Dips (e.g. guacamole/hummus)
	f) Fresh herbs
	g) Honey
	h) Noodle snacks
	i) Powders that are not herbs or spices (e.g. peanut powder)
	j) Processed meat or seafood products or convenience meals that come with sauce/seasoning packs within the packaging
	k) Spices packed upon customers' request
	l) Vinegar and cooking wine
	m) Herbal soup packs or mixes
	n) Other western sauces (e.g. mushroom paste, cranberry sauce, mint sauce)
	o) Pure dehydrated herbs in prepacked form, that do not contain sodium, saturated fat or sugar
	p) Sesame dressings
	q) Soy sauce alternatives
	r) Tahini
	s) Wasabi
		For (b),(c),(d),(h),(i),(j): These products constitute other types of processed foods, outside the scope of salt, sauces and seasonings, instant noodles and oil.
		
		For (e): These products are ready-to-serve and thus, are outside the scope of salt, sauces and seasonings.
		
		For (f) – actual plants and (k): These products are not considered prepacked, and hence not subject to the Nutri-Grade extension.
		
		For (g) and (l): Honey, vinegar and cooking wine are not within the scope of "sauces and seasonings". This is aligned with the categories listed within the "global sodium benchmarks for different food categories"[2]. Moreover, these products are not key sources of sodium.
		
		Products (m) to (s) are subject to the Nutri-Grade extension: These products are various types of "sauces and seasonings".
		
		For (m): herbal soup packs/mixes constitute a type of soup stock and thus falls within the scope of "sauces and seasonings". A distinction is made between products like (b) and (m), where the former comprises a type of ready-to-serve, convenience meal (e.g. often contains vegetables and meat on top of soup/broth), whereas the latter is a stock that consumers can use as an ingredient to season and prepare a final soup dish.
		
		For (o): These products constitute herb, spice and seasoning mixes, and thus are subject to the Nutri-Grade extension. That said, herb, spice or mixtures thereof that do not contain

[2] WHO global sodium benchmarks for different food categories, 2nd edition, Geneva: World Health Organisation, 2024 <https://www.who.int/publications/i/item/9789240092013>

		any calories, protein, fat, saturated fat, carbohydrate, sugar and sodium are exempt from NIP requirements. If these products do not contain sodium or saturated fat or sugar, they are likely to be graded A and therefore, not mandated to carry the Nutri-Grade label on packaging. For (r): Based on current information available to HPB, it is widely used as a base for creating various sauces, seasonings and/or ready-to-serve dips, which falls within the scope of "sauces and seasonings".
2.3	Some respondents queried whether small single-serve packages (e.g. small sachets of sauces distributed in F&B establishments or given to patients in hospitals) would be within scope of the measures.	We considered this feedback and on further review, we intend to exempt very small packages of single-serve products (where applicable) with total packaging volume less than 30cm^3. This is to ensure the measures remain practicable, as we recognize that compliance may not be feasible for very small packages.
3) Comments on the proposed grading system		**MOH/HPB's response**
3.1	Some respondents commented that salt and sugar were natural preservatives and that lowering these nutrient levels might require alternative preservation methods. Noting that alcohol could not be used as a preservative to retain halal certification, manufacturers may have to add more preservatives or invest in more research and development.	The feedback is noted. MOH/HPB encourage further research and development into methods and technologies that can overcome these challenges, such as through other forms of preservation or packaging methods. HPB has a grant scheme, the Healthier Ingredient Development Scheme (HIDS), that supports research and development of lower-sodium sauces.
3.2	Some respondents felt that beneficial nutrients in products (e.g. wholegrains in instant noodles, fruit and vegetable content in sauces) should be accounted for in the grading system, so as to holistically reflect the nutritional value of the product.	The extension of the Nutri-Grade grading system is aimed at reducing sodium and saturated fat intake. The approach taken, to focus on nutrients of concern, is aligned with other mandatory front-of-pack labelling schemes adopted in other countries (e.g. Chile's warning label).

		At the same time, this does not detract from our ability to recognise the beneficial nutrients for targeted population segments. The Nutri-Grade measures are introduced alongside ongoing public education efforts and HPB's other programmes, such as the Healthier Choice Symbol Programme, where industry can use the symbol to highlight positive nutrients in their products. Industry may also continue to use nutrient claims, supported by nutrition information panels (NIP), to inform consumers about beneficial nutrients in their products.
3.3	On the approach for secondary nutrient(s) of concern, some respondents sought clarification on the rationale for: a) Inclusion of secondary nutrient(s), given the government's focus on reducing sodium intake and that these categories may not be key contributors of national sugar and saturated fat intake respectively b) The choice of which secondary nutrient(s) applied to each category	Where relevant, sugar and saturated fat were included in the grading system for sauces, seasonings and instant noodles on top of sodium, as they are also nutrients of concern in those categories in the local market. Including thresholds for these nutrients in the grading system would mitigate the risk of substitution of sodium with sugar or saturated fat when these products are reformulated. This is aligned with the approach adopted for beverages, where saturated fat was included as a secondary nutrient of concern, in addition to sugar. .
3.4	Some respondents suggested alternative approaches for setting thresholds: a) Align the lower bound threshold for Grade D, with the recommended daily intake of sodium (e.g. 2000mg); b) Align the lower bound threshold for Grade D, with the nutrient thresholds used in overseas Front-of-Pack Labelling schemes such as Europe's Nutri-Score; c) Align with the thresholds for beverages, after accounting for differing serving sizes.	Grading thresholds are set based on the spread of nutrient content and product profiles within each sub-category in the local market. This ensures the thresholds serve as feasible, step-wise targets to spur reformulation. It would not be accurate to use the recommended daily intake as the sodium threshold, as the former refers total nutrient intake across all food and drinks in an entire day, whereas the latter refers to the nutrient content per 100g. Adopting the thresholds used in overseas labelling schemes, or for beverages, would not take into account the unique composition and nutrient profile of salt, sauces and

		seasonings, instant noodles and cooking oil in the local market, and therefore may not be effective in spurring reformulation.
3.5	Some respondents shared that the usage and role of the products should be taken into consideration, when categorizing products and setting thresholds.	Usage is taken into account in the categorization of products, to ensure 'like' products are grouped similarly.
3.6	One respondent expressed concern that applying positive grades (e.g. Grades A or B) on product categories deemed to be 'unhealthy' (e.g. instant noodles) could inadvertently lead to consumers consuming them more frequently.	HPB does not assess food categories to be inherently 'healthy' or 'unhealthy'. Instead, the measures aim to shift preferences towards healthier alternatives, within each category. Therefore, the Nutri-Grade grading system adopts the principle of relativity, where all products are objectively graded along the spectrum of nutrient content.
3.7	**<u>On the grading system for salt</u>** Some respondents noted that grading salt based on sodium would encourage the use of potassium-enriched salt, and said there were safety concerns about their use for selected individuals (e.g. kidney patients). Another respondent noted that sodium content of salt was highly variable, and suggested to widen the range of the thresholds by lowering the upper threshold for A to 120mg/g and that for B to 300mg/g.	Clinicians and professional bodies have advised that potassium-enriched salt is safe for a vast majority of the population, except those with advanced kidney disease. These individuals are already closely monitored by their physicians and are advised to limit their dietary intake of all forms of salt, whether regular or lower-sodium salt. After careful consideration, there will be no change to the grading thresholds for salt, taking into account the importance of ensuring a good spread of products across the grades.
3.8	**<u>On grading system for oils</u>** Some respondents commented on the importance of considering other factors beyond saturated fat content, when grading cooking oils. In particular: Potential misuse of soft oils with lower saturated fat content a) Soft oils with lower saturated fat content (e.g. salad oils) were not suitable for high-heat cooking, as doing so may result in the production of other harmful substances. There	We considered the feedback and on further review, have adjusted the thresholds to take into account the various feedback received. **<u>On potential misuse of soft oils with lower saturated fat content:</u>** MOH / HPB will explore other measures to address concerns regarding the potential misuse of softer oils.

	was a suggestion to classify oils based on smoke point to guide consumers on their intended use (e.g. for high-heat cooking versus not) Reformulation feasibility for deep-frying oil: b) The saturated fat content of pure oils is fixed and cannot be reduced without blending. There was a suggestion to introduce a new sub-category for 'healthier oils'. Considering other attributes beyond saturated fat: c) Oils and fats are a necessary component of a balanced diet, and HPB recommends that saturated fat intake make up no more than 30% of total fat intake; d) The local availability of different oil types (e.g. palm and coconut trees more prevalent in Southeast Asia), differing culinary practices (e.g. sesame oil's nutty flavour is integral to East Asian cuisine) and cooking techniques should be taken into consideration; e) Grading oils based on saturated fat would result in palm oil being graded D, despite being affordable, containing antioxidants, practical, having shelf-life, and versatile. There was a suggestion to consider other attributes (e.g. fat composition, antioxidant and vitamin content) in the grading system. f) Some respondents felt that the grading system should have special consideration for oils perceived to be 'healthy' or 'high quality', such as olive oil, rapeseed oil, corn oil, soyabean oil and medium-chain triglyceride oils. Alignment with HCS: f) There was a suggestion to align the saturated fat thresholds with current Healthier Choice Symbol criteria.	**<u>On reformulation feasibility for deep-frying oil:</u>** We will maintain a single sub-category for cooking oils. This is to allow comparability across all oils. With the adjustments in thresholds, deep-frying oils that are lower in saturated fat will still be able to qualify for better grades. **<u>On considering other attributes beyond saturated fat:</u>** The grading system for oils will continue to be based on its primary nutrient of concern, which is saturated fat. This is so that the Nutri-Grade measures can address excessive saturated fat intake as intended. **<u>Alignment with HCS:</u>** MOH/HPB has reviewed the Grade B thresholds to align with existing healthier choice criteria for cooking oil.

3.9	**<u>On the grading system for soy sauces</u>** Some respondents commented that the proposed grading system did not take into account the protein level, or Total Nitrogen (TN) content, of soy sauces, which was the indicator of 'quality' for this product category. As part of the soy sauce manufacturing process, 'high quality' products (with higher TN) tended to have higher sodium content and were more likely to be graded D, whereas 'low quality' soy sauce (with lower TN, e.g. those with minimal soybean content) could more easily achieve Grade A. Respondents also shared that very low sodium products may not be able to achieve the minimum TN standards required by other countries.	We considered this feedback and on further review, we have adjusted the sodium thresholds for soy sauces to ensure that manufacturers can achieve sodium reduction, while maintaining minimum TN standards required by other countries.
3.10	**<u>On the grading system for chili, ketchup and brown sauce</u>** Some respondents said that these products tended to be sweeter in nature, especially so for sub-types such as sweet chili, and thus it was challenging to achieve the sugar thresholds proposed.	We considered this feedback and on further review, we have reviewed the thresholds across all categories, taking into consideration the extent of reformulation required to achieve the next best grade. For example, the sugar thresholds for chilli sauce have been adjusted to account for the product profile of this product category.
3.11	**<u>On the grading system for instant noodles</u>** <u>Saturated fat:</u> One respondent requested for the removal, or relaxation, of saturated fat thresholds for instant noodles, on the basis that: a) Majority of saturated fat content comes from the noodle cake, rather than seasoning packs. As palm oil is used to fry the noodle cakes, owing to its antioxidant properties, high-heat stability, versatility and cost-effectiveness, the respondent said the minimum saturated fat content was 8g per 100g of instant noodle – from the noodle cake alone. b) Certain flavours require higher levels of saturated fat (e.g. laksa).	For saturated fat: After careful consideration, there will be no change to the saturated fat thresholds for instant noodles. This decision was made after reviewing the spread of products in the local market across the grades, and the feasibility of reducing saturated fat in both the noodle cake and seasoning packs. For sodium: After careful consideration, our position remains that dry and soup instant noodles would be in separate sub-categories, to take into account their different nutrient profiles and facilitate feasible reformulation for each category. Consequently, the sodium thresholds for each sub-category would be based on the new nutrient distribution of that sub-category (e.g. higher sodium levels found in soup instant noodles).

	c) Instant noodles are not a key contributor of saturated fat intake <u>Sodium</u>: One respondent requested to align the sodium threshold across dry and soup instant noodle categories, as both were consumed as one portion regardless of preparation method.	
3.12	**<u>On the grading system for emulsified sauces and dressings</u>** <u>Saturated fat:</u> Some respondents noted that the Singapore Food Regulations requires mayonnaise to contain a minimum of 30% oil content, and other countries requires a minimum of 65% oil content. Even if lower-saturated fat oil was used, it would be challenging to meet the proposed saturated fat thresholds for emulsified sauces and dressing, which includes mayonnaise, while meeting the minimum oil content required. <u>Sodium:</u> One respondent commented that the sodium thresholds for emulsified sauces and dressings appeared to be more stringent compared to other categories, despite these products being used in smaller amounts. This would result in majority of products in Grades C and D, which may deter consumers from consuming salads, the predominant use for these products. They requested for a review of the sodium thresholds, possibly based on serving size. <u>Sugar</u>: One respondent commented that these products tended to be high in sugar, which played the role of a natural preservative, and expressed concern that reducing sugar levels may result in manufacturers using more artificial preservatives. They suggested for the government to monitor and review the use of artificial ingredients in products.	For saturated fat: We considered this feedback and on further review, we have adjusted the saturated fat thresholds for emulsified sauces and dressings to take into account the minimum oil content for mayonnaise. For sodium and sugar: We considered this feedback and on further review, we have adjusted the sodium and sugar thresholds for emulsified sauces and dressings to better facilitate reformulation. We also note the feedback on artificial ingredients.

3.13	**<u>On the grading system for tomato-based sauces</u>** One respondent requested to create separate sub-categories for tomato sauce, versus tomato paste/pesto. They said that tomato sauces and pastes had differing nutrient composition (e.g. claim that pastes are higher in sodium and sugar than sauces) and serving sizes (e.g. claim that pastes have smaller serving sizes than sauces). Hence, they proposed having separate sub-categories to increase reformulation feasibility and reflect the products' actual contribution to dietary intake.	After careful consideration, there will be no change to the categorization for this category. While tomato paste/pesto may be more concentrated than tomato sauce, it does not inherently require it to have higher sodium as there is presence of reduced-sodium products in the market. The thresholds were established after taking into account the variation in nutrient content across the variety of products in the sub-category.
3.14	**<u>On the grading system for soup & broth (concentrate)</u>** One respondent requested for relaxation of the sodium and saturated fat thresholds. They said that their internal review suggested that majority of products, even those with significantly lower levels of nutrients of concern than competitors, currently fell into Grades C and D.	We considered this feedback and on further review, we will split the current "soup & broth (concentrate)" sub-category into two further sub-categories: "soup & broth (liquid concentrate)" and "soup & broth (dry concentrate)". This decision was made after reviewing the nutrient distribution of products, which found that liquid concentrates and dry concentrates had different nutrient distributions. Splitting them into separate sub-categories allows us to better take into account their differing product profiles and ensure practical thresholds.
3.15	**<u>On the grading system for monosodium glutamate (MSG)</u>** Some respondents suggest classifying monosodium glutamate (MSG) in the "salt and salt substitute" category, instead of the "herb, spice and seasoning mix" category, for the following reasons: • Studies across several countries show that MSG can partially replace salt in foods, resulting in reduction of sodium content by 11% to 40% without sacrificing palatability. Further simulation studies suggest that umami substances (including MSG) can reduce adults' salt intake by 0.61 – 2.22 g/day.	We considered this feedback carefully, and on further review, we will exclude pure MSG, when packaged on its own, from the Nutri-Grade extension, on the basis that: a) it is classified in Singapore and internationally as a food additive to be used in foods, which means it is a substance not normally consumed as a food by itself and not normally used as a typical ingredient of the food; and b) Food additives, when packaged on their own, are typically excluded from nutrition labelling requirements.

	• Public health organisations around the world (e.g. Institute of Medicine, Academy of Nutrition and Dietetics and Food and Drug Administration in the US, World Health Organization) support MSG or umami substances as effective tools for reducing sodium in foodstuffs. • The composition of MSG is more similar to salt (both are single ingredients), as compared to herbs, spices and seasoning mixes, which are mixtures that could include salt or MSG. • As a single ingredient, it is impossible for MSG to reformulate to reduce sodium content. • MSG fulfils the definition of being a salt substitute as it reduces sodium content and partially replaces salt, whereas seasoning mixes are not intended to replace salt.	To be clear, food that contain MSG (e.g. reduced sodium salt blends with a mix of sodium chloride and MSG, stock cubes) would be within the scope of the Nutri-Grade extension.
3.16	**<u>On the grading system for Asian savoury sauce and mix</u>** One respondent commented that there were different types of "Asian savoury sauces and mixes", those with salt-dehydrated ingredients (e.g. dried shrimp, soybean, salted fish) and those without. They commented that the former would contain higher amounts of sodium, and thus suggested for them to be split into a separate sub-category with its own grading thresholds.	After careful consideration, there will be no change in the categorization of "Asian savoury sauce and mix". This is to achieve the policy intent of spurring reformulation of all products to reduce sodium content, including reducing the use of highly salted ingredients.
3.17	**<u>On the grading system for Herb, Spice and Seasoning Mix</u>** One respondent requested to relax the sugar threshold for "Herb, Spice and Seasoning Mix" as some natural herbs such as dates, tended to have higher sugar content.	After careful consideration, there will be no change in the thresholds of "Herb, Spice and seasoning mix" as the thresholds had already taken into account the variation in sugar content across the variety of products in the category.
3.18	**<u>On using 'as sold' nutrient values for the grading thresholds</u>** Some respondents commented that products could take several different forms (e.g. sauce, concentrated paste, or powder form),	After careful consideration, there will be no change to the approach of using nutrient values in the product as sold for grading, which seeks to spur reformulation of the product and minimize risk of abuse. This approach is aligned with that

	with more concentrated forms having higher sodium levels. This was relevant for the following categories: • Soup and broth (concentrate) • Asian savoury sauce and mixes • Tomato-based sauce • Non tomato-based sauce • Herb, spice and seasoning mix They also shared that more concentrated forms of products were advantageous for the industry, as it saved space, reduced packaging material and was more cost effective. Therefore, they requested for the grading thresholds to be based on the nutrient values in the product as prepared, after reconstitution.	used in the World Health Organization global sodium benchmarks and other countries' sodium targets. In unique cases where sauces and pastes are sold in powdered forms, manufacturers may grade the product based on the nutritional information for the as-prepared form. Manufacturers should declare the values for both the per 100g as-sold and per 100g as-prepared forms, with the latter determined by applying the conversion factor according to the manufacturer's instructions to convert the powdered form back into its typical or generally perceived form. This is to ensure fair comparison with their counterparts.
3.19	Some respondents expressed concern about potential misalignment between the Nutri-Grade and Healthier Choice Symbol (HCS) labelling schemes, especially if products carrying the HCS were graded C or D.	The criteria for the HCS will be adjusted to align with the thresholds in the Nutri-Grade grading system, such that HCS products would be graded A or B. This is aligned to the approach adopted for beverages. As part of HPB's public education efforts, we will continue to inform consumers that HCS products are graded A or B.
4) Comments on the proposed labelling requirements		**MOH/HPB's response**
4.1	One respondent shared that more manpower would be required to comply with the labelling requirements, and it would be challenging and costly for importers to determine the nutritional content of imported items.	We note the feedback. We encourage the industry to reformulate their products or shift their portfolios towards HCS products. HPB's Healthier Ingredient Development Scheme (HIDS), provides grant support for the development (including R&D, packaging design and taste tests) and commercialisation of HCS salt, sauces and seasoning and healthier oil.
4.2	Some respondents said that it was challenging to reformulate and create unique packaging for imported products for the Singapore market only, as most products are supplied to several countries in the region, some of which may not accept the Nutri-Grade labels. This may inadvertently create an unfair market advantage for large multinational corporations. Also, the alternative of using sticker labels would increase cost and be time-consuming.	

4.3	Some respondents suggested alternative labelling schemes, such as those indicating “high”, “medium” or “low” amounts of sodium and other nutrients.	MOH/HOB had studied the range of labelling schemes adopted globally, including Guideline Daily Amounts (GDA) and traffic-light labels that indicated the amount of individual nutrients. However, respondents to the 2018-2019 public consultation shared that they preferred labels that summarised the nutritional content of the product into a single grade or score, and gave direct guidance to consumers. Recent consumer study also affirmed that the color-coded nutrient summary label was easy to understand and effective.
4.4	One respondent suggested to mandate the labelling of Grade A and B products, to further encourage consumers to opt for healthier products.	After careful consideration, our position remains that labelling the Nutri-Grade mark on Grade A and B products will be optional to encourage the industry to reformulate their products towards Grades A and B. We encourage businesses to label products graded “A” or “B” with the Nutri-Grade label to help consumers make informed choices.
4.5	One respondent sought clarification if labelling preparation instructions (e.g. precise amount of water to add to instant noodles) would be made mandatory.	We strongly encourage manufacturers to provide instructions to consumers, to inform them of the proper way to prepare and consume the products.
4.6	Some respondents asked for the Nutri-Grade label design to be revised, to reduce the number of colours to be printed given the increase in printing cost with every additional colour. Some suggestions were: • Allow monochrome printing of the Nutri-Grade label or ; • Only require colour printing for the product’s grade, with the rest of the ABCD spectrum printed in white; • Allow simplified Nutri-Grade mark to be used on all prepacked products. One respondent requested to keep the formatting requirements of the label optional, to allow flexibility for products to be exported to other markets.	After careful consideration, our position remains that the Nutri-Grade mark must be in full colour, and that the full Nutri-Grade mark must be used for individual prepacked products. As per the current approach for beverages, the simplified Nutri-Grade mark may only be used in situations where there is more than one beverage option listed (e.g. menus, vending machines, beverage dispensers, online locations of sale, multipacks). On colour-coded versus monochrome labels, international evidence and local consumer studies affirm that colour-coded labels are visually impactful. In the context of the Nutri-Grade mark, consumers perceived the colour-coded label to be more effective than monochrome labels in encouraging consumers to choose healthier over less healthy options.

		On the full versus simplified Nutri-Grade mark, local consumer studies affirm that the full Nutri-Grade mark containing the ABCD spectrum is critical to help consumers to contextualise a particular grade, to make healthier choices.
4.7	One respondent suggested to have only 2-3 standard sizes of Nutri-Grade mark in order to reduce carbon footprint of printed stickers for multiple sizes.	After careful consideration, our position remains that the minimum size of the Nutri-Grade mark depends on the front-of-pack area of the package. This is to account for the diverse shapes and sizes of packaged products, and ensure a level playing field.
4.8	**On the proposal to call out the nutrient of concern resulting in the product's final grade on the Nutri-Grade label** There were mixed views. Some respondents concurred with calling out the nutrient of concern that resulted in the product's final grade on the Nutri-Grade label, as it allows consumers to be better informed. One also suggested declaring the amounts of all three nutrients of concern. Other respondents raised concerns with the proposal, noting that it might cause confusion (e.g. differing call outs across products) and prevent consumers from comparing sodium content across categories. On balance, one respondent felt while calling out the nutrient of concern resulting the product's final grade on label was advantageous over the current approach, removing the call out entirely might be the most ideal. Other respondents sought clarification on the formatting requirements to declare saturated fat on the Nutri-Grade label (e.g. whether to shorten to "sat fat") and the rounding rules for declaration.	Given the complexity and number of sub-categories involved in the extension to salt, sauces, seasonings, instant noodles and cooking oil, we assessed that calling-out the nutrient of concern resulting in the product's final grade on label will help facilitate understanding of the basis of the final grade. This approach also addresses ongoing consumers' misperceptions surrounding the grading system, as some consumers may be unaware that the Nutri-Grade considers multiple nutrients of concern. In addition, the implementation of the Nutri-Grade measures will be accompanied by public education efforts to inform public on how to understand the label, including changes to the call-out. Consumers can refer to the NIP to compare amounts of specific nutrients across products.

5) Comments on the proposed labelling requirements – nutrition information panel (NIP)		**MOH/HPB's response**
5.1	A respondent commented that the font size in the NIP could be bigger for easy reading, especially for senior citizens.	After careful consideration, our position remains to align with the current minimum font size for text on packaging labels, specified in the prevailing Food Acts and Regulations.
5.2	Some respondents suggested to exempt the below products from NIP requirements, to reduce cost impact to businesses (e.g. reprinting): • Single ingredients • Grade A products	After careful consideration, our position remains to require the NIP for all products across the categories subject to the Nutri-Grade extension (regardless of grade), with the exception of herbs, spices and mixtures thereof that do not contain calories, fat, carbohydrates, protein and sodium. Other single ingredients may still contain these nutrients (e.g. salt). Declaring the NIP allows consumers and the authorities to substantiate the information on the Nutri-Grade mark, or the absence of one (in the case of Grade A or B products).
5.3	Some respondents proposed greater flexibility for the NIP, including: a) Allowing a simplified NIP for salt and salt substitutes; b) Allowing sodium content to be declared as "salt", which some European countries require; c) Allowing nutrient content to be declared either based on the product 'as sold' or 'as prepared', as some imported products currently state the latter; d) Removing the requirement to declare cholesterol and dietary fibre from HPB's voluntary guide to nutrition labelling Others sought clarification on the format requirements for the NIP, including: e) Whether nutrient content should be declared per 100g or 100ml;	The nutrition information panel may be declared in the format as specified under the Twelfth Schedule of the Food Regulations, or in such other acceptable similar form. We considered the feedback, and agree that for salt and salt substitutes, basic information (i.e. energy, protein, fat, carbohydrate and sodium) should be present. We recommend that "sodium" content to be declared instead of "salt" in NIP as to facilitate ease of comparison for consumers. However, our position remains that under the Nutri-Grade extension, the NIP should state the nutrient values in the product per 100g as sold, in line with the grading thresholds. Supplementary information on the nutrient values in the product as prepared may be included, on an optional basis.

	f) What constituted negligible amounts of nutrients.	Detailed guidance on acceptable variances and what constitutes negligible amounts of nutrients will be provided at a later date.
6) Comments on the proposed advertising prohibitions		**MOH/HPB's response**
6.1	Some respondents sought the below clarifications on the scope of the advertising prohibitions: a) Whether promotional materials featuring hampers containing Nutri-Grade D products, would be prohibited; b) Whether recommendations for Grade D products on online variety shops, based on past purchase history, would be prohibited; c) Whether advertisements for Grade C products are required to display the Nutri-Grade mark; d) Whether advertisements for a brand of products were prohibited, if one or more products within that brand family were graded D	**For (a): Generally subject to advertising prohibition** Promotional materials that promote the sale of Grade D salt, sauces, seasonings, instant noodles and oil will be prohibited. In other words, materials that feature the Grade D product would be prohibited. If the material only features the hamper and not the specific Grade D product, further review is required to ascertain if the material indirectly promotes the sale of the Grade D product. **For (b): Depends** Exemptions from the advertisement prohibition at POS platforms are limited to physical and online variety shops. However, if the materials that contain the name and/or image of product, are found outside the online locations of sale that transact sales from a particular variety shop, these are considered as advertisements and are subject to the advertising prohibition e.g. digital banner/push notifications on the home page of an e-commerce app that consolidates orders across merchants. **For (c): Not subject to advertising prohibition** Products graded C are not subjected to advertising prohibition. However, it is mandatory for all Grade C products to have the Nutri-Grade mark labelled on the front-of-packs, as well as across all materials that inform its sales. **For (d): Depends** Advertisements for a generic brand family that do not feature specific products are not subject to the prohibition.

		Advertisements that feature a group of products, including one or more Grade D products, are prohibited, except for those published in a variety shop or an online variety shop (provided they display the Nutri-Grade mark of the Grade D product).
6.2	Some respondents felt focusing on public education, starting from childhood, would be a more balanced and effective approach to shift preferences, compared to advertising prohibitions.	While we continue to implement various approaches to promote healthier diets such as public education campaigns and industry support schemes, these do not preclude the use of regulations. After careful consideration, our position remains that mandatory advertising prohibitions will be implemented, in order to fulfil the policy intent of reducing sodium and saturated fat intake, to address the growing public health concern with hypertension and hyperlipidaemia. We have also seen that the combination of mandatory labelling and advertising prohibitions has been effective in reducing sugar intake in beverages.
7) Comments on the proposed compliance requirements		**MOH/HPB's response**
7.1	Some respondents asked about how the regulations would be enforced, including the penalty structure for non-compliance, and noted the importance of enforcing similar requirements on parallel imports.	Audit checks will be conducted by the relevant authorities to monitor compliance. These may include, but are not limited to: (a) conducting lab analysis of products to determine their nutrient values and grades, and (b) requesting for information from manufacturers, importers and distributors to support the information displayed on the Nutri-Grade mark and NIP. The penalty structure would follow that in the prevailing Food Acts and Regulations.
7.2	Some respondents requested for additional support from HPB to determine the category and grade of products. Noting the added complexity in the grading system with multiple nutrients of concern and categories, one respondent suggested for HPB to	HPB will continue to support the industry to facilitate implementation of the Nutri-Grade extension, such as through: a) Providing an email address for the industry to submit queries

	develop an online calculator for the industry to easily determine the grade of their products.	b) Providing detailed industry guidance documents c) Working with Institutes of Higher Learning to provide further consultancy services d) Enhancing the current Nutri-Grade calculator for beverages, to be used for the other categories of products.
8) Comments on the proposed timeline		**MOH/HPB's response**
8.1	There were mixed comments on the timeline. Some respondents commented that the proposed timeline was sufficient. On the other hand, other respondents requested for 2.5 – 6 years' runway, from the date of publishing final specifications to the effective implementation date, for the following reasons: a) **Reformulation efforts**: This involves multiple stages including sourcing for alternative ingredients, development, sensory testing, and shelf-life stability testing. Respondents noted that reducing sodium was more challenging than reducing sugar in beverages, as the former serves important technological functions (e.g. preservation). Hence, this process could take 4-6 months for a single iteration for soy sauces (due to timeframe for fermentation), and be longer if replacement with salt substitutes was required, and longer if the company had larger volumes of products (e.g. up to 3 years). b) **Transition to new packaging labels and stickering:** This includes the time needed to amend packaging labels or apply sticker labels, and to apply for certification of other schemes (e.g. Healthier Choice Symbol, Halal certification)	We considered this feedback carefully, and on further review, we will extend the implementation timeline by 6 months, to allow time for reformulation, packaging changes, and depletion of existing stock. With this, the Nutri-Grade extension would be targeted to come into effect by mid-2027, giving the industry over two years to adjust after the final specifications are released in April 2025.

	c) **Consumer adaptation**: time for consumers to adjust their palettes and increase receptivity to healthier products, especially if salt substitutes were used and consumer education on their safety were needed. d) **Stock management**: time needed to deplete existing stock, which will be longer for products with long shelf-lives (up to 3 years) and smaller manufacturers, whose products may not move as quickly as that of larger manufacturers. One respondent proposed a phased roll-out approach, starting with implementation for instant noodles, followed by implementation for other ingredients (e.g. sauce and seasonings) as these were more complex.	
8.2	Some respondents suggested to align the timelines between the Nutri-Grade label, revisions to the criteria for Healthier Choice Symbol and NEA's Beverage Container Return Scheme, to reduce the number of reprinting iterations by the industry.	We considered this feedback carefully, and on further review, we will align the timeline between the Nutri-Grade extension and the changes to the HCS criteria. We note that NEA's BCRS is intended to come into effect by mid-2026. MOH / HPB will explore the possibility of allowing beverage companies to update the Nutri-Grade labels by this time (ahead of the intended effective date for the Nutri-Grade extension in mid-2027), to reduce the number of iterations of reprinting needed.
9) Comments on implementation cost		**MOH/HPB's response**
9.1	Some respondents commented that the Nutri-Grade extension would increase cost for the industry, due to reformulation, cost of alternative ingredients (e.g. potassium salt is more expensive than regular salt), analyzing nutrient content of products, adapting recipes and packaging for the Singapore market and applying sticker labels. For instance, respondents cited that label amendments would cost S$200-400 per label, and the printing	We note the feedback. We encourage the industry to reformulate their products or shift their portfolios towards HCS products. HPB is currently reviewing the Healthier Choice Symbol development scheme (under the Healthier Ingredient Development Scheme (HIDS)), to increase support for components such as

	plate would cause S$1000. Businesses may then have to pass on the cost to consumers, adding to inflationary pressures.	packaging related costs (e.g. label amendments and printing plates), for manufacturers to reformulate their products to meet the HCS guidelines.
9.2	Some respondents requested for greater grant support, particularly for reformulation and packaging changes. They cited that HPB's Healthier Ingredient Development Scheme (HIDS) currently did not support research and development conducted in-house (it only supported the engagement of external consultants) or overseas (it only supported activities conducted in Singapore), and packaging changes for existing Healthier Choice Symbol (HCS) products.	We noted the feedback on the current HIDS grant support and we are currently reviewing the supportable components under the grant.
10) Other comments		**MOH/HPB's response**
10.1	Some respondents commented on the importance of continued consumer education in parallel with regulatory measures, such as to: • Increase awareness of the need to reduce sodium and saturated fat intake, and boost demand for healthier alternatives; • Educate consumers on the amount of each ingredient they should be using, and not to add more even if they use lower-sodium alternatives; • Increase awareness of the Nutri-Grade extension, including the grading system taking into account secondary nutrient(s) of concern, so as to ensure consumer trust in the labelling. For instance, one respondent suggested an optional QR code for businesses to apply on product package labels, for consumers to find out more about the Nutri-Grade measures; • Educate consumers on the distinction between HCS and Nutri-Grade; • Educate consumers about the beneficial nutrients in products	We note the feedback. HPB will continue to conduct public education campaigns to promote healthier lifestyles holistically and educate consumers on how to interpret and use the Nutri-Grade labels vis-à-vis HCS.
10.2	Some respondents commented that greater government action to encourage F&B operators to use healthier alternatives of these ingredients was needed, noting that only government-related	We note the feedback and will continue to strengthen engagements across the supply chain to increase F&B operators' access to healthier ingredients, while stepping up

	premises were currently required to use them under Whole-of-Government policies.	on public education efforts to educate consumers and F&B operators on the importance of reducing sodium in food.
10.3	Some respondents noted that a longer implementation runway and adjustments to the thresholds would be required if the measures were to be extended to the food service sector, noting that products supplied to the food service sector are often in highly concentrated form due to storage space constraints.	We note the feedback and bear this in mind if mandatory measures for the food service sector are considered.

Annex B: Organisations who participated in industry dialogues and provided feedback in Phase 2 consultations

Manufacturers and Suppliers	
1. Ajinomoto Singapore Pte Ltd 2. Beta Resources Pte Ltd 3. Chuen Cheong Food Industries Pte Ltd 4. Chung Hwa Food Industries Pte Ltd 5. Danone Specialied Nutrition (Singapore) Pte Ltd 6. Del Monte Asia Pte Ltd 7. Everglades Pte Ltd 8. Faesol Pte Ltd 9. Food Services Initiatives Pte Ltd 10. Fuji Oil (Singapore) Pte. Ltd. 11. Gan Hup Lee Pte Ltd 12. Goh Joo Hin Pte Ltd 13. IMI Lifestyle Products Pte Ltd 14. Instaramen Pte Ltd 15. Ken Hoe Seng Company 16. Kerry Ingredients (M) Sdn Bhd 17. Keto Science Pte Ltd 18. Kewpie Singapore Pte Ltd 19. Khong Guan Salt 20. Kikkoman Trading Asia Pte Ltd 21. Kwong Cheong Thye 22. Lam Soon Singapore 23. Lee Kum Kee Singapore Pte Ltd 24. Luckin Coffee (SGP) Pte Ltd	25. McCormick Ingredients Southeast Asia Pte Ltd 26. Mount Fuji Enterprise 27. Nestle Singapore Pte Ltd 28. Ngo Chew Hong Edible Oil Pte Ltd 29. Nissin Foods Singapore Pte Ltd 30. Oatside Pte Ltd 31. Oh Aik Guan Food Industrial Pte Ltd 32. Prima Limited 33. Seah's Spices Food Ind Pte Ltd 34. Sim Soon Heng Cooking Ingredients Pte Ltd 35. Simplot 36. Sin Hwa Dee Foodstuff Industries Pte Ltd 37. Sing Long Foodstuff Trading Co Pte Ltd 38. Tai Hua Food Industries Pte Ltd 39. Tat Hui Foods Pte Ltd 40. Thai Sing Foodstuffs Industry Pte Ltd 41. The Arnotts Group Malaysia 42. Unilever Singapore Pte Ltd 43. Yi Hai Malaysia Sdn. Bhd
Importers/Distributor/Wholesaler	
1. A.Muse Projects Pte Ltd 2. APNS Pte Ltd 3. Chin Guan Hin Enterprises Pte Ltd 4. DKSH 5. Emil Pte Ltd 6. Ever Design & Build Pte Ltd 7. JD Globalisation Pte Ltd 8. Lim Siang Huat Pte Ltd 9. Martin-Brower Singapore Pte Ltd	10. Times Chemicals Pte Ltd 11. Tong Seng Produce Pte Ltd 12. Topseller Pte Ltd 13. Towkay Grocery Pte Ltd 14. U-Group Holdings Pte Ltd 15. UICCP Pte Ltd 16. Veiinex Ventures LLP 17. VitaKids Pte Ltd 18. Vrescano Pte Ltd 19. Woah Group Pte Ltd

F&B Operators	
1. Baktech Food Service & Supplies 2. CJ Kitchen Pte Ltd 3. Field Catering & Supplies Pte Ltd. 4. Fortune Food Manufacturing Pte Ltd 5. Kentucky Fried Chicken Management Pte Ltd 6. Mandai Wildlife Group	7. Pizza Hut Singapore Pte Ltd 8. Sakuraya Foods Pte Ltd 9. Select Group Pte Ltd 10. Sheng Sheng 11. Super Hi Dining Pte Ltd
Retailers	Industry Associations
1. DFI Retail Group 2. Mr Bazaar Pte Ltd 3. NTUC Fairprice Co-operative Pte Ltd 4. Sheng Siong Supermarket Pte Ltd	1. Food Industry Asia (FIA) 2. Singapore Food Manufacturers' Association (SFMA) 3. Singapore Manufacturing Federation (SMF) 4. International Glutamate Technical Committee (IGTC) 5. Singapore Polytechnic, Food Innovation & Resource Centre (FIRC)