

# **A GUIDE TO NUTRITION LABELLING FOR FOOD PRODUCTS (SINGAPORE)**

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## 1. Introduction

This document serves as a guide to help industry players (manufacturers, distributors, retailers, and commercial users) understand the requirements for health and nutrition labelling for food products.

It consolidates relevant information pertaining to nutrition labelling from SFA's "A Guide to Food Labelling and Advertisements" as well as HPB's "Handbook of Nutrition Labelling", to serve as the primary reference.

This document does not provide legal advice and is not meant as a source of legal advice. It should be read in conjunction with the following materials:

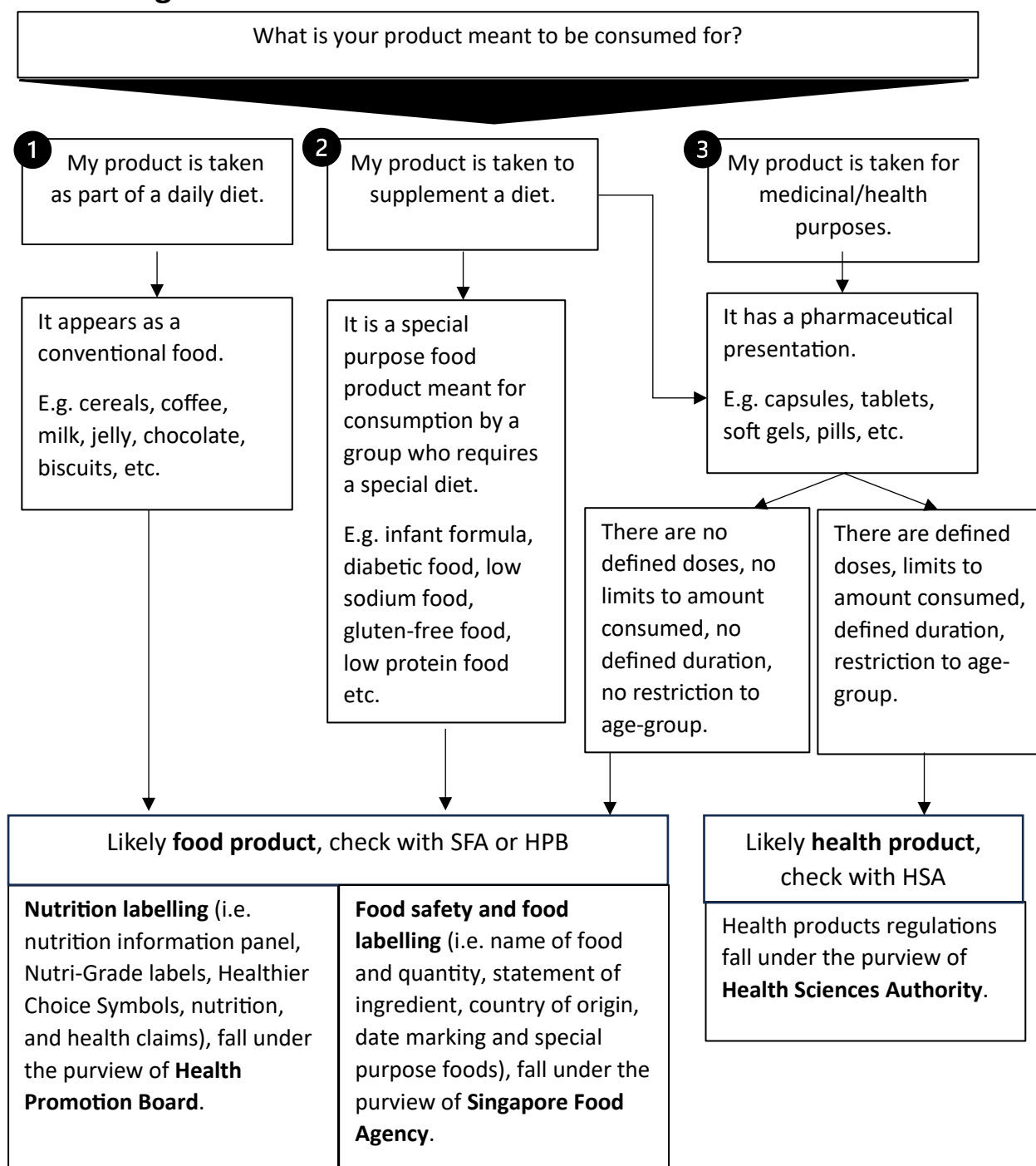
- a) Singapore Food Regulations
- b) Sale of Food Act

First and foremost, businesses are responsible to ensure that the food they sell in Singapore conforms to the Sale of Food Act and Food Regulations and are labelled in accordance with the requirements of the said legislation.

All food labels, advertisements, as well as any materials that inform the sale of food, must not be false or misleading, or prohibited by the Singapore Food Regulations. Businesses must also ensure that they maintain evidence to substantiate nutrition labelling information as well as health and nutrition claims with evidence from scientific journals, guidelines or supporting documents such as laboratory analyses, as relevant. Businesses may be asked to produce such information during compliance checks.

For claims within this guide, no pre-market approval is required, if businesses can fulfil the corresponding criteria. Post-market surveillance will be conducted by the relevant authorities to ensure that the regulations are complied with.

## 2. Working definition



Note: Products that fall under these categories are not considered food products: medicinal products, any controlled drugs, any poisons, any cosmetics, any tobacco products or tobacco substitutes, any packae (except edible packaging), any fodder or feeding stuffs for animals

### 3. Nutrition information panel

A nutrition information panel (NIP) contains nutrient information, which helps consumers assess the nutritive value of a given food.

Under the Food Regulations, businesses are required to include a NIP for prepacked food products under the following conditions:

- They are Nutri-Grade beverages.
- They are special purpose foods.
- They bear a nutrition and/or health claim.
- They contain edible fats and oils.

For avoidance of doubt, businesses should refer to the Food Regulations to determine whether a NIP is necessary for their products. However, it is strongly encouraged that businesses include the NIP to guide consumers in making informed choices.

#### 3.1 Placement of a nutrition information panel

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

For small packaging that has a total surface area of less than 100 square centimetres, a NIP display will not be needed. 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 (e.g. sugar-free) or where there is a claim with respect to the energy value of the food (e.g. low calorie).

#### 3.2 Format of a nutrition information panel

The NIP may be declared in the format as specified under the Twelfth Schedule of the Food Regulations, or in such other acceptable similar form. A recommended NIP should include the following basic information (with exception for fresh produce):

- The core list of nutrients are energy, protein, total fat, saturated fat, cholesterol, carbohydrate, total sugar, dietary fibre, and sodium.
- The energy and nutrient values can be stated in per 100g/100ml and per serving of the food.
- The NIP can include the number of servings per package and the serving size.
- For powdered beverages and liquid concentrates, an additional column stating nutrient values per 100ml (as reconstituted) can be included.

## **General Format**

- The text of the NIP 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 NIP, 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.

## **Panel Heading**

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

## **Serving Size**

- The 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, etc).

Figure 1: An example of nutrition information panel

<b>NUTRITION INFORMATION</b>			> 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)	> Nutrient Listing
Energy	x kcal (x kJ)	x kcal (x kJ)	
Protein	x g	x g	
Total Fat	x g	x g	<p>Polyunsaturated fat and monounsaturated fat may be inserted after saturated fat.</p> <p>Omega fatty acids may be inserted after polyunsaturated/monosaturated fat.</p>
- Saturated Fat	x g	x g	
- Polyunsaturated Fat	x g	x g	
- Omega 3	x g	x g	
- Omega 6	x g	x g	
- Monounsaturated Fat	x g	x g	
- Omega 9	x g	x g	
Cholesterol	x mg	x mg	
Carbohydrate	x g	x g	Glucose, Lactose, and Galactose may be inserted under Total Sugar
- Total Sugar	x g	x g	
- Glucose	x g	x g	
- Lactose	x g	x g	
- Galactose	x g	x g	Resistant starch can be listed under dietary fibre.
Dietary Fibre	x g	x g	
- Resistant Starch	x g	x g	
Sodium	x mg	x mg	Other nutrients claimed can be added after the core list.
Magnesium	x mg	x mg	
Vitamin D	x mg	x mg	
Phytosterols	x g	x g	Phytosterols can be listed separately from total fat.

### 3.3 Ensuring Accuracy of Nutrition Information Methods of Nutrient Analysis

Relevant authorities will follow up on cases of misrepresentation of the nutrition information on any food product.

#### Methods of Nutrient Analysis

To ensure that the nutrient information declared is accurate and consistent, 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 are recommended.

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>

For overseas accredited laboratories, please refer to SAC Mutual Recognition Arrangement (MRA).

#### Nutrient Verification Criteria

Declared nutrition information must be based on the composition of the food product (e.g. solid or liquid) and must meet the nutrient verification criteria in Figure 2 during post-market surveillance.

Figure 2: Nutrient Verification Criteria

<b>Stated Nutrient Content</b>	<b>Naturally occurring nutrients</b> E.g. Vitamins, minerals, protein, total carbohydrate, polyunsaturated or monounsaturated fat, dietary fiber, soluble fiber, insoluble fiber	<b>Nutrients added in fortified or fabricated foods</b> E.g. Vitamins, minerals, protein, total carbohydrate, polyunsaturated or monounsaturated fat, dietary fiber, soluble fiber, insoluble fiber	<b>Nutrients to be reduced in the diet</b> E.g. Calories, total sugars, added sugars, total fat, saturated fat, trans fat, cholesterol, sodium
<b>Actual Nutrient Criteria</b>	≥80% of declared value	≥100% of declared value	<120% of declared value



## 4. Overview of using claims on food products

Food labels containing nutrition and health claims must be supported by a NIP. All claims on food products must be verifiable based on scientific evidence. Relevant authorities will follow up on cases of misrepresentation of the nutrition information on any food product.

This checklist is intended to assist businesses to check if their food product complies with the health and nutrition claims labelling requirements of the Food Regulations.

Please refer to the relevant section on nutrient and health claims respectively for the detailed requirement of each claim.

### 4.1 Health and nutrition claim labelling requirements

For those items marked “No” in this section, please rectify accordingly.

No.	Health and nutrition claim labelling requirements	Yes	No
1.	<b>Product Definition:</b> Product falls within the <a href="#">working definition of food</a> .		
2.	<b>Approved claim:</b> Health or nutrition claim is within the list of approved claims.		
3	<b>Criteria fulfilled:</b> Product meets the stated criteria for the health or nutrition claim stated in this guideline.		
4.	<b>Labelled with NIP:</b> The nutrient of concern for which a claim is made must be supported by a NIP.		
5.	<b>Misleading:</b> The claim is not false, misleading, or prohibited by the Food Regulations on the product and any materials that inform its sale.		
6.	<b>Supporting documents:</b> Companies to keep documentary evidence (e.g. laboratory analyses, evidence from scientific journals, etc) for post-market compliance checks.		

## 5. Nutrition claims

### 5.1 Definition

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

Examples of nutrition claims are “High in fibre”, “Low in fat”, “Cholesterol free”, “Sugar free”.

### Quantity Basis for Nutrition Claims

The quantity may be stated as ‘per serving’, ‘per 100 g’, ‘per 100 ml’ or ‘per 100 kcal’. When using the ‘per serving’ claim, the food would have to meet the requirements for ‘per 100 g’ (solid) or ‘per 100 ml’ (liquid).

When comparing with a reference food, a statement must be included to compare the nutrient content of the subject food to the reference food. For wholegrains, when comparing with a reference food, a statement must be included to compare the wholegrains percent of the subject food to the reference food.

### 5.2 Macronutrients

S/N	List of Approved Nutrition Claims	Guide Page Reference
<b>Energy</b>		
1	Energy Free	Please refer to <b>Appendix I: Energy</b> for detailed criteria and further information
2	Calorie Free	
3	Source of Energy	
4	High in Energy	
5	High Energy	
6	Low Energy	
7	Low Calorie	
8	Lite in Energy	
9	Light in Energy	
10	Light in Calorie	
11	Light Dinner	
12	Lite Dinner	
13	Light Meal	
14	Lite Meal	
15	Less Energy	
16	Less Calorie	
17	Lower in Calorie	
18	Reduced Energy	
19	Calorie Reduced	
20	Less Energy	
21	More / Increased / Fortified / Enriched / Added Energy	

S/N	List of Approved Nutrition Claims	Guide Page Reference
<b>Protein</b>		
22	Source of Protein	Please refer to <b>Appendix I: Protein</b> for detailed criteria and further information
23	Contains Protein	
24	Good Source of Protein	
25	High in Protein	
26	Rich in Protein	
27	Excellent Source of Protein	
28	Low Protein	
29	Reduced Protein	
30	More / Increased / Fortified/ Enriched / Added Protein	
<b>Carbohydrate</b>		
31	Source of Carbohydrate	Please refer to <b>Appendix I: Carbohydrate</b> for detailed criteria and further information
32	Contains Carbohydrate	
33	Low in Carbohydrate	
34	Low Carbohydrate	
35	Reduced Carbohydrate	
36	Carbohydrate-Reduced	
37	More / Increased / Fortified / Enriched / Added Carbohydrate	
<b>Sugar</b>		
38	No Added Sugar	Please refer to <b>Appendix I: Carbohydrate</b> for detailed criteria and further information
39	Without Added Sugar	
40	Unsweetened	
41	Sugar Free	
42	Free of Sugar	
43	Lactose Free	
44	Low Sugar	
45	Low in Sugar	
46	Lite in Sugar	
47	Light in Sugar	
48	Less Sugar	
49	Lower Sugar	
50	Lower in Sugar than ...	
51	Reduced Sugar	
<b>Glycemic Index</b>		
52	Low Glycemic Index	
<b>Fibre</b>		
53	Source of Dietary Fibre	
54	Contains Dietary Fibre	

S/N	List of Approved Nutrition Claims	Guide Page Reference
55	High in Dietary Fibre	Please refer to <b>Appendix I: Fiber and wholegrain</b> for detailed criteria and further information
56	High Source of Dietary Fibre	
57	Good Source of Dietary Fibre	
58	Fibre-Rich	
59	More / Increased / Fortified / Enriched / Added Dietary Fibre	
<b>Wholegrain</b>		
60	Higher in Wholegrains	
<b>Fat</b>		
61	Fat Free	Please refer to <b>Appendix I: Fats and cholesterol</b> for detailed criteria and further information
62	Contains No Fat	
63	Free of Fat	
64	Low Fat	
65	Low in Fat	
66	Light in Fat	
67	Lite in Fat	
68	Reduced Fat	
69	Lower Fat	
70	Reduced in Fat	
71	Lower in Fat	
72	Less Fat than...	
73	A certain % less	
74	Lean Meat	
75	Extra Lean Meat	
<b>Fatty Acid</b>		
76	Saturated Fat Free	Please refer to <b>Appendix I: Fats and cholesterol</b> for detailed criteria and further information
77	Free of Saturated Fat	
78	Low Saturated Fat	
79	Low in Saturated Fat	
80	A certain % less	
81	Reduced in Saturated Fat / Lower in Saturated Fat / Reduced Saturated Fat	
82	Contains Polyunsaturated Fats	
83	Source of Polyunsaturates (or Polyunsaturated Fatty Acids or Polyunsaturates)	
84	Presence of Polyunsaturates	
85	High in Polyunsaturated Fats (or Polyunsaturated Fatty Acids or Polyunsaturates)	
86	Increased Polyunsaturated Fats	

S/N	List of Approved Nutrition Claims	Guide Page Reference
87	More Polyunsaturated Fats	Please refer to <b>Appendix I: Fats and cholesterol</b> for detailed criteria and further information
88	Contains Monounsaturated Fats	
89	Source of Monounsaturates (or Monounsaturated Fatty Acids or Monounsaturates)	
90	Presence of Monounsaturates	
91	High in Monounsaturated Fats (or Monounsaturated Fatty Acids or Monounsaturates)	
92	Increased Monounsaturated Fats	
93	More Monounsaturated Fats	
94	Trans Fat Free	
95	Free of Trans Fat	
96	No Added Trans Fat	
97	Without Added Trans Fat	
<b>Cholesterol</b>		
98	Cholesterol Free	Please refer to <b>Appendix I: Fats and cholesterol</b> for detailed criteria and further information
99	No Cholesterol	
100	Free of Cholesterol	
101	Low Cholesterol	
102	Light in Cholesterol	
103	Low in Cholesterol	
104	Lite in Cholesterol	
105	A certain % less	
106	Reduced in Cholesterol	
107	Lower in Cholesterol	
108	Reduced Cholesterol	

### 5.3 Micronutrients

S/N	List of Approved Nutrition Claim	Guide Page Reference
<b>Sodium</b>		
109	No Added Salt	Please refer <b>Appendix I: Sodium</b> for detailed criteria and further information
110	No Salt Added	
111	Unsalted	
112	Salt Free	
113	Sodium Free	
114	Low in Salt	
115	Low Sodium	
116	Light in Salt	

117	Low Salt	Please refer <b>Appendix I: Sodium</b> for detailed criteria and further information
118	Light in Sodium	
119	Lite in Salt	
120	Low in Sodium	
121	Lite in Sodium	
122	Lightly Salted	
123	Very Low in Salt	
124	Very Low in Sodium	
125	A certain % less	
126	Reduced Salt	
127	Lower in Salt	
128	Lower in Sodium	
<b>Vitamin and Mineral</b>		
129	Source/Contain/added with/with/presence of a vitamin / mineral	Please refer to <b>Appendix I: Vitamin and mineral</b> for detailed criteria and further information
130	Excellent source/Enriched/ Fortified/Ennobled/Vitaminised/ High/Good/Rich of a vitamin/mineral	

## 6. Health claims

### 6.1 Definition

A **health claim** is any representation that states, suggests, or implies that a relationship exists between a food or a constituent of that food and health.

### 6.2 Nutrient Function Claim

**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.”*

S/N	List of Approved Health Claim	Guide Page Reference
<b><u>Nutrient Function Claim</u></b>		
<b>Macronutrient</b>		
1	Protein provides the essential amino acids needed to aid in the building and maintenance of body tissues.	Please refer to <b>Appendix II: Nutrient-function claim</b> for detailed criteria and further information.
2	Protein helps in tissue building and growth	
3	Low lactose content may aid in digestion	
4	Low lactose content eases digestion for people who are lactose intolerant	
5	Dietary fibre aids in digestion	
<b>Vitamins</b>		
6	Vitamin A is essential for the functioning of the eye	Please refer to <b>Appendix II: Nutrient-function claim</b> for detailed criteria and further information.
7	Vitamin A helps to maintain normal skin and mucous membrane.	
8	Vitamin A contributes to the normal function of the immune system	
9	Vitamin B1 helps to release energy from proteins, fats, and carbohydrates	
10	Vitamin B1 contributes to normal functioning of the nervous system	
11	Vitamin B1 contributes to the normal functioning of the heart	
12	Vitamin B2 helps to release energy from proteins, fats, and carbohydrates	
13	Vitamin B2 contributes to the reduction of tiredness and fatigue	
14	Vitamin B2 contributes to the maintenance of normal skin	
15	Vitamin B2 contributes to the maintenance of normal red blood cells	
16	Vitamin B2 contributes to maintenance normal vision	

S/N	List of Approved Health Claim	Guide Page Reference
17	Vitamin B2 contributes to normal functioning of the nervous system	Please refer to <b>Appendix II: Nutrient-function claim</b> for detailed criteria and further information.
18	Vitamin B2 contributes to the protection of cells from oxidative stress	
19	Vitamin B3 helps to release energy from proteins, fats, and carbohydrates	
20	Vitamin B3 contributes to the reduction of tiredness and fatigue	
21	Vitamin B3 contributes to the maintenance of normal skin	
22	Vitamin B3 contributes to normal functioning of the nervous system	
23	Pantothenic acid contributes to normal energy productions	
24	Pantothenic acid contributes to the reduction of tiredness and fatigue	
25	Pantothenic acid contributes to normal mental performance	
26	Vitamin B6 is important for the production of energy	
27	Vitamin B6 contributes to the reduction of tiredness and fatigue	
28	Vitamin B6 contributes to normal functioning of the nervous system	
29	Vitamin B6 contributes to the normal red blood cell formation	
30	Vitamin B6 contributes to the normal function of the immune system	
31	Vitamin B6 contributes to normal homocysteine metabolism	
32	Vitamin B6 contributes to the regulation of hormonal activity	
33	Vitamin B12 is necessary for fat, carbohydrate, and protein metabolism	
34	Vitamin B12 is needed for/helps in the formation of red blood cells	
35	Vitamin B12 contributes to the reduction of tiredness and fatigue	
36	Vitamin B12 contributes to normal functioning of the nervous system	
37	Vitamin B12 contributes to the normal function of the immune system	
38	Vitamin B12 contributes to normal homocysteine metabolism	
39	Folate contributes to normal immune system function	
40	Folate contributes to the reduction of tiredness and fatigue	
41	Folate contributes to normal homocysteine metabolism	
42	Folate contributes to normal amino acid synthesis	
43	Folate helps support fetus' growth and overall development	
44	Folate plays a role in the formation of red blood cells	
45	Folate, taken before and during early pregnancy, helps in the mental/normal and overall development of fetus	
46	Folic acid is essential/important for growth and division of cells	
47	Vitamin C enhances absorption of iron from non-meat products	



S/N	List of Approved Health Claim	Guide Page Reference	
48	Vitamin C contributes to normal collagen formation for the normal function of blood vessels	Please refer to <b>Appendix II: Nutrient-function claim</b> for detailed criteria and further information.	
49	Vitamin C contributes to normal collagen formation for the normal function of bones		
50	Vitamin C contributes to normal collagen formation for the normal function of cartilage		
51	Vitamin C contributes to normal collagen formation for the normal function of gums		
52	Vitamin C contributes to normal collagen formation for the normal function of skin		
53	Vitamin C contributes to normal collagen formation for the normal function of teeth		
54	Vitamin C contributes to normal functioning of the immune system		
55	Vitamin C contributes to normal functioning of the nervous system		
56	Vitamin C contributes to the reduction of tiredness and fatigue		
57	Vitamin C contributes to the protection of cells from oxidative stress		
58	Vitamin D helps support calcium absorption and improves bone strength		
59	Vitamin D helps the body utilise calcium and phosphorus		
60	Vitamin D contributes to normal blood calcium levels		
61	Vitamin D contributes to the maintenance of normal muscle function		
62	Vitamin D contributes to the maintenance of normal teeth		
63	Vitamin D contributes to the normal function of the immune system		
64	Vitamin E is an antioxidant that helps protect cells in the body		
65	Antioxidants like vitamin E help to protect cells from free radicals that may have escaped the natural process of our body system		
66	Vitamin K is necessary for normal blood coagulation		
67	Biotin contributes to normal energy-yielding metabolism		
68	Biotin contributes to normal macronutrient metabolism		
69	Biotin contributes to the maintenance of normal hair		
70	Choline contributes to normal lipid metabolism		
71	Choline contributes to the maintenance of normal liver function		
72	Choline helps support overall mental functioning for children up to 6 years of age		
73	Vitamins K and D work synergistically on bone metabolism to improve bone strength/build strong bones		
<b>Minerals</b>			
74	Calcium helps build/to support development of strong bones and teeth.		

S/N	List of Approved Health Claim	Guide Page Reference
75	Calcium contributes to normal energy metabolism.	Please refer to <b>Appendix II: Nutrient-function claim</b> for detailed criteria and further information.
76	Calcium is necessary for normal nerve and muscle function.	
77	Calcium is necessary for normal blood coagulation.	
78	Iodine is essential for the synthesis of thyroid hormones by the thyroid gland.	
79	Iodine is necessary for normal energy metabolism.	
80	Iodine contributes to normal cognitive function.	
81	Iodine contributes to the maintenance of normal skin.	
82	Iron is an important component of red blood cells which carry oxygen to all parts of the body to help the body's production of energy	
83	Iron is needed to produce haemoglobin, the protein in red blood cells that carries oxygen to tissues	
84	Iron is needed to produce myoglobin, the protein that helps supply oxygen to muscle	
85	Iron contributes to normal cognitive function / development	
86	Iron contributes to normal energy production	
87	Iron contributes to the reduction of tiredness and fatigue	
88	Iron is necessary for normal immune system function	
89	Iron is necessary for normal cell division	
90	Iron support the child's natural defenses for children up to 6 years of age	
91	Phosphorus contributes to bone development	
92	Phosphorus contributes to normal energy metabolism	
93	Phosphorus contributes to the maintenance of normal teeth	
94	Magnesium helps in the absorption and retention of calcium	
95	Magnesium contributes to energy metabolism and the maintenance of bone and teeth	
96	Magnesium is necessary for normal nerve and muscle function	
97	Magnesium is necessary for normal electrolyte balance	
98	Magnesium contributes to a reduction of tiredness and fatigue	
99	Zinc is essential for growth	
100	Zinc contributes to normal metabolism of fatty acids	
101	Zinc contributes to the maintenance of normal bones	
102	Zinc contributes to the maintenance of normal hair	
103	Zinc contributes to the maintenance of normal nails	
104	Zinc contributes to the maintenance of normal vision	
105	Zinc contributes to normal cognitive function	
106	Zinc contributes to the normal macronutrient metabolism	
107	Zinc contributes to the normal carbohydrate metabolism	
108	Zinc contributes to the normal protein synthesis	
109	Zinc contributes to the normal metabolism of Vitamin A	
110	Zinc is necessary for cell division	

DISCLAIMER: This document is to be used as a guide only and is not to be relied upon as a source of legal advice. For detailed specifications of the labelling and advertising requirements, please refer to the *Food Regulations*.

S/N	List of Approved Health Claim	Guide Page Reference
111	Zinc is necessary for normal immune system function	Please refer to <b>Appendix II: Nutrient-function claim</b> for detailed criteria and further information.
112	Zinc helps in physical development for children up to 6 years of age	
113	Zinc supports the child's natural defenses for children up to 6 years of age	
114	Selenium contributes to the maintenance of normal hair	
115	Selenium contributes to the maintenance of normal nails	
116	Selenium contributes to the maintenance of the normal function of the immune system	
117	Selenium contributes to the protection of cells from oxidative stress	
118	Potassium contributes to normal muscle function	
119	Potassium contributes to normal functioning of the nervous system	
120	Copper contributes to normal energy production	
121	Copper contributes to normal functioning of the nervous system	
122	Copper contributes to the normal functioning of the immune system	
123	Copper contributes to the normal hair pigment	
124	Copper contributes to normal skin pigmentation	

### 6.3 Other Function Claim

**Other function claims** refer to claims about the specific beneficial effects of consuming foods or their food constituents as part of the total diet on the body's normal functions or biological activities by positively contributing to health, improving the function, 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."*

S/N	List of Approved Health Claim	Guide Page Reference
<b>Other Function Claims</b>		
<b>Other Nutrients/Food Constituent</b>		
125	Chromium contributes to normal macronutrient metabolism	Please refer to <b>Appendix II: Other function claims</b> for detailed criteria and further information.
126	Collagen is a protein in connective tissues found in skin, bones and muscles	
127	DHA and ARA are important building blocks for development of the brain and eyes for children up to 3 years of age.	
128	Nucleotides are essential to normal cell function and replication, which are important for the overall growth and development of children up to 6 years of age	
129	Taurine helps to support overall mental and physical development for children up to 6 years of age	
130	Inulin helps in calcium absorption	
131	Inulin helps support growth or beneficial bacteria/good intestinal flora in gut	
132	Inulin helps increase intestinal bifidobacteria and helps maintain a good intestinal environment	
133	Oligofructose stimulates the bifidobacteria, resulting in a significant increase of the beneficial bifidobacteria in the intestinal tract. At the same time, the presence of less desirable bacteria is significantly reduced	
134	Prebiotic promotes the growth of good Bifidus bacteria to help maintain a healthy digestive system	
135	Prebiotic blend (galacto-oligosaccharides and long chain fructo-oligosaccharides) support the child's natural defenses for children up to 6 years of age	
136	Probiotics to help maintain a healthy digestive system	
137	Probiotics helps in digestion	
138	Probiotics helps to maintain a desirable balance of beneficial bacterial in the digestive system	
139	Probiotics helps to suppress/fight against harmful bacteria in the digestive system, thereby helping to maintain a healthy digestive system	

### 6.3 Reduction of disease risk claims

**Reduction of disease risk claims** are claims relating to the consumption of a food or food constituent, in the context of the total diet, of which associates with the reduced risk of developing a disease or health related condition.

*Example: “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.”*

*Note: New claims pertaining to reduction of disease risk, must be gazetted in the Food Regulations before businesses may use them on their food products.*

S/N	List of Approved Health Claims	Guide Page Reference
<b>Reduction of Disease Claims</b>		
140	Plant sterols/stanols have been shown to lower/reduce blood cholesterol. High blood cholesterol is a risk factor in the development of coronary heart disease	Please refer to <b>Appendix II: Reduction of disease risk claims</b> for detailed criteria and further information.
141	Barley beta-glucans / Oat beta-glucans have been shown to lower/reduce blood cholesterol. High blood cholesterol is a risk factor in the development of coronary heart disease.	
142	A healthy diet with adequate calcium and vitamin D, with regular exercise, helps to achieve strong bones and may reduce the risk of osteoporosis. (Name of food) is a good source of/high in/enriched in/fortified with calcium.	
143	A healthy diet low in sodium may reduce the risk of high blood pressure, a risk factor for stroke and heart disease. (Name of food) is sodium free/low in/very low in/ reduced in sodium.	
144	A healthy diet low in saturated fat and trans-fat, may reduce the risk of heart disease. (Name of food) is free of/ low in saturated fats, trans fats.	
145	A healthy diet rich in whole grains, fruits and vegetables that contain dietary fibre, may reduce the risk of heart disease. (Name of food) is low/free of fat and high in dietary fibre.	
146	A healthy diet rich in fibre containing foods such as whole grains, fruits and vegetables may reduce the risk of some types of cancers. (Name of food) is free/ low in fat and high in dietary fibre.	

## 7. Infants' formula and food nutrition labelling

This section nutrition and health claim labelling guideline for infant formula and infant food should be read in conjunction with regulation 251 to 254 of the Food Regulations, which states the full labelling requirements.

Businesses must ensure that labelling and marketing of infant food and formula comply with the requirements specified in the regulations. They are obligated to adhere to the Sale of Infant Foods Ethics Committee Singapore (SIFECs) Code of Ethics, which guides practices of the Infant Food Industry as well as protect and promote the practice of breastfeeding. The soft copy of the code can be downloaded from the following website: <https://www.hpb.gov.sg/healthy-living/food-beverage/sifecs>

Enquiries on SIFECs matters may be sent to the email address: HPB\_SIFECs@hpb.gov.sg

### 7.1 Infant food

Infant food, excluding infant formula for ages 0-6 months, must not suggest that the food is appropriate for infants aged 6 months and younger (Regulations 251(2A)).

### 7.2 Infant formula

Nutrition and health claims in Section 5 and 6 above are not applicable to infant formula; please refer to this section for nutrition labelling for infant formula.

In the case of infant formula sold or to be sold as lactose-free, low lactose, or similar, the total lactose content must not exceed 10 mg per 100 kcal. The label must include the words “lactose free” or “low lactose”, or similar, a statement specifying the exact amount of lactose in the infant formula within the NIP on the label and a statement indicating the product is “Not suitable for infants with galactosaemia”.

### **Prohibited claim**

The label on a package of any infant formula for infants, or an advertisement about any infant formula for infants, must not contain:

- Claims that make comparison to breast milk or idealization of infant formula as breast milk substitute. (e.g. An excellent substitute of breastmilk)
- Claims that purport that formula is used on the advice of a doctor/healthcare practitioner. (e.g. This formula is recommended by a paediatrician)
- Claims with respect to the nutrients specified under regulation 252(3) of the Food Regulations as tabulated in Figure 3 must not be made. (e.g. Contains Vitamin D)

Figure 3: Nutrients listed under Regulation 252(3)

1. Protein	10. Folic acid	19. Calcium
2. Fat	11. Pantothenic acid	20. Phosphorus
3. Vitamin A	12. Vitamin B12	21. Magnesium
4. Vitamin D	13. Vitamin K1	22. Iron
5. Vitamin C	14. Vitamin H (Biotin)	23. Iodine
6. Vitamin B1 (thiamine)	15. Vitamin E	24. Copper
7. Vitamin B2 (riboflavin)	16. Sodium	25. Zinc
8. Nicotinamide	17. Potassium	26. Manganese
9. Vitamin B6	18. Chloride	27. Selenium

- Under the Regulation 254(3)(d), any claims on the energy, carbohydrate and other nutritive properties of any ingredient of the infant formula, which is not mentioned in Regulation 252 (5) and (6), should not be used.

Figure 4: Ingredients listed under Regulations 252(5) and 252(6)

<p>1. Essential amino acids in natural L-forms:</p> <ul style="list-style-type: none"> <li>• Leucine</li> <li>• Lysine</li> <li>• Methionine</li> <li>• Phenylalanine</li> <li>• Threonine</li> <li>• Tryptophan</li> <li>• Valine</li> </ul>	<p>2. Nucleotides:</p> <ul style="list-style-type: none"> <li>• Cytidine 5'-Monophosphate</li> <li>• Uridine 5'-Monophosphate</li> <li>• Adenosine 5 – Monophosphate</li> <li>• Guanosine 5'-Monophosphate</li> <li>• Inosine 5'-Monophosphate</li> </ul>	<p>3. Long chain polyunsaturated fatty acids [including docosahexaenoic acid (DHA) and Arachidonic acid (AA)]</p> <p>4. Galacto-oligosaccharides</p> <p>5. Polydextrose, Long chain inulin, Oligofructose produced from inulin</p> <p>6. Bovine lactoferrin</p> <p>7. Beta-palmitin</p> <p>8. 2'-fucosyllactose</p> <p>9. Lacto-N-neotetraose</p> <p>10. 2'-fucosyllactose/difucosyllactose mixture</p> <p>11. Lacto-N-tetraose</p> <p>12. Sodium salt of 3'-sialyllactose</p> <p>13. Sodium salt of 6'-sialyllactose</p> <p>16. 3-fucosyllactose Nucleotides:</p>
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- Claims that state, suggest, or imply that the infant formula or its components have a health effect (e.g. Choline helps support overall mental functioning)
- Claims that state, suggest, or imply that the infant formula is enriched, fortified, or an excellent source of specific ingredients (e.g. Excellent source of DHA)

## **8. Prohibited claims on food labels and advertisements**

Under Regulation 9 of the Food Regulations, false or misleading statement, word, brand, picture, or mark purporting to indicate the nature, stability, quantity, strength, purity, composition, weight, origin, age, effects, or proportion of the food or any ingredients are not allowed to be used on food labels and advertisements, unless otherwise specified.

The use of claims for therapeutic or prophylactic action; claims which could be interpreted as advice of a medical nature from any person; claims that a food will prevent, alleviate or cure any disease or condition affecting the human body; and claims that health or an improved physical condition may be achieved by consuming any food, is prohibited.

A list of examples on prohibited claims can be found in **Appendix III: Examples of prohibited claims on food**.



## Appendix I: List of nutrition claims and criteria

### Appendix I: Energy

<b>Definition</b>	<ul style="list-style-type: none"> <li>Food energy is defined as the energy released from carbohydrates, fats, proteins, and other organic compounds.</li> </ul>
<b>Notes on High in Energy and High Energy claim</b>	<ul style="list-style-type: none"> <li>The claim “High in Energy” and “High Energy” can only be used with ‘formulated supplementary sports food’ and ‘meal replacement’.</li> <li>‘<i>Formulated supplementary sports food</i>’ is defined as a food or mixture of foods formulated to help sports people achieve specific nutritional goals, such as, regaining strength.</li> <li>‘<i>Meal replacement</i>’ is defined as a product intended as a complete meal, containing all 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</li> </ul>
<b>Notes on Source of Energy, High Energy and High in Energy claim</b>	<ul style="list-style-type: none"> <li>The recommended quantity of food to be consumed per day must provide <math>\geq 300</math> kilocalories.</li> <li>If per serving is used, please include daily recommendation statement. Examples of the daily recommendation statement are “Recommended daily intake: 3 servings”; “Add 20g powder in 200ml water. Drink 2 times daily.”</li> </ul>
<b>Notes on reference food and meal type product</b>	<ul style="list-style-type: none"> <li>Please refer to the glossary section for the detailed definition of the terms.</li> </ul>

<b>Nutrient</b>	<b>Claims</b>	<b>Criteria</b>
<b>Energy</b>	1. Energy Free 2. Calorie Free	<ul style="list-style-type: none"> <li><math>\leq 1</math> kilocalorie per 100 g / 100 ml, or</li> <li><math>\leq 5</math> kilocalorie per serving</li> </ul>
	1. Source of Energy	<ul style="list-style-type: none"> <li><math>\geq 100</math> kilocalorie per serving</li> </ul>

	<ol style="list-style-type: none"> <li>1. High in Energy</li> <li>2. High Energy</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 300</math> kilocalorie per 100 g, or</li> <li>• <math>\geq 80</math> kilocalorie per 100 ml</li> </ul>
	<ol style="list-style-type: none"> <li>1. Low Energy</li> <li>2. Low Calorie</li> <li>3. Lite in Energy</li> <li>4. Light in Energy</li> <li>5. Light in Calorie</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\leq 8</math> kilocalorie per 100 ml for beverages (ready for consumption), or</li> <li>• <math>\leq 100</math>kcal per 100g for bread spreads including jam substitutes</li> <li>• Or <math>\leq 50</math>kcal per 100g for other foods.</li> </ul>
	<ol style="list-style-type: none"> <li>1. Light Dinner</li> <li>2. Lite Dinner</li> <li>3. Light Meal</li> <li>4. Lite Meal</li> </ol>	<u>Meal Type Product</u> <ul style="list-style-type: none"> <li>• <math>\leq 120</math> kilocalorie per 100 g, or</li> <li>• <math>\leq 300</math> kilocalorie per serving</li> </ul>
	<ol style="list-style-type: none"> <li>1. Less Energy</li> <li>2. Less Calorie</li> <li>3. Lower in Calorie</li> <li>4. Reduced Energy</li> <li>5. Calorie Reduced</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 25\%</math> less energy than the reference food</li> </ul>
	<ol style="list-style-type: none"> <li>1. More / Increased / Fortified / Enriched / Added Energy</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 25\%</math> more energy than the reference food</li> </ul>

## Appendix I: Protein

<b>Definition</b>	Proteins are large molecules made up of amino acids.
<b>Notes on Good Source of Protein, High in Protein, Rich in Protein, Excellent Source of Protein</b>	<ul style="list-style-type: none"> <li>The quantity of that food to be consumed in one day, and an acceptable NIP should be included on the label.</li> <li>Examples of the daily recommendation statement are “Recommended daily intake: 3 servings”; “Add 20g powder in 200ml water. Drink 2 times daily.”</li> </ul>
<b>Notes on reference food</b>	<ul style="list-style-type: none"> <li>Please refer to the glossary section for the detailed definition of the terms.</li> </ul>

<b>Nutrient</b>	<b>Claim</b>	<b>Criteria</b>
<b>Protein</b>	<ol style="list-style-type: none"> <li>Source of Protein</li> <li>Contains Protein</li> </ol>	<ul style="list-style-type: none"> <li>The recommended quantity of food to be consumed per day must provide <math>\geq 10\text{g}</math> protein</li> <li>To claim for a source of protein, the protein content of the food must contribute to at least 12% of calorie yield</li> </ul>
	<ol style="list-style-type: none"> <li>Good Source of Protein</li> <li>High in Protein</li> <li>Rich in Protein</li> <li>Excellent Source of Protein</li> </ol>	<ul style="list-style-type: none"> <li>The recommended quantity of food to be consumed per day must provide <math>\geq 10\text{g}</math> protein</li> <li>To claim for a good source of protein, the protein content of the food must contribute to at least 20% of calorie yield</li> </ul>
	<ol style="list-style-type: none"> <li>Low Protein</li> </ol>	<ul style="list-style-type: none"> <li><math>&lt;5\%</math> kilocalories from protein</li> </ul>
	<ol style="list-style-type: none"> <li>Reduced Protein</li> </ol>	<ul style="list-style-type: none"> <li><math>\geq 25\%</math> less protein than the reference food</li> </ul>

	1. More / Increased / Fortified/ Enriched / Added Protein	<ul style="list-style-type: none"><li>• ≥25% more protein than the reference food</li></ul>
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## Appendix I: Carbohydrate

<b>Definition</b>	<ul style="list-style-type: none"> <li>• <b>Carbohydrate:</b> Carbohydrates are polyhydroxy aldehydes, ketones, alcohols, acids, their simple derivatives, and their polymers which have linkages of the acetal type, excluding dietary fibre. They may include the following: <ul style="list-style-type: none"> <li>- Sugars such as monosaccharides (e.g. glucose) and disaccharides (e.g. sucrose);</li> <li>- Sugar alcohols (e.g. isomalt, lactitol, maltitol, maltitol syrup, mannitol, sorbitol and xylitol);</li> <li>- Starch</li> </ul> </li> <li>• <b>Sugar:</b> As per the WHO definition for free sugars, this includes all monosaccharides and disaccharides added to foods by the manufacturer, plus sugars naturally present in honey, syrups, and fruit juices. This definition excludes lactose and galactose if naturally present in milk. Deionised fruit juice is also considered free sugar.</li> <li>• <b>Sweetening substances:</b> Nonnutritive or artificial sweeteners such as saccharin, aspartame, acesulfameK and sucralose and steviol glycosides.</li> </ul>
<b>Notes on Glycemic Index claim</b>	<ul style="list-style-type: none"> <li>• The cut-off values for the classification of low, medium, and high GI are standardised internationally (ISO 26642:2010).</li> </ul>
<b>Notes on reference food and meal type product</b>	<ul style="list-style-type: none"> <li>• Please refer to the glossary section for the detailed definition of the terms.</li> </ul>

Nutrient	Claim	Criteria
Carbohydrate	<ol style="list-style-type: none"> <li>1. Source of Carbohydrate</li> <li>2. Contains Carbohydrate</li> </ol>	<ul style="list-style-type: none"> <li>• &gt; 10 g carbohydrate per 100 g</li> </ul>
	<ol style="list-style-type: none"> <li>1. Low in Carbohydrate</li> <li>2. Low Carbohydrate</li> </ol>	<ul style="list-style-type: none"> <li>• ≤ 10 g carbohydrate per 100 g, or</li> <li>• ≤ 2 g carbohydrate per serving</li> </ul>

Nutrient	Claim	Criteria
	<ol style="list-style-type: none"> <li>1. Reduced Carbohydrate</li> <li>2. Carbohydrate-Reduced</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 25\%</math> less carbohydrate than the reference food</li> </ul>
	<ol style="list-style-type: none"> <li>1. More / Increased / Fortified / Enriched / Added Carbohydrate</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 25\%</math> more carbohydrate than the reference food</li> </ul>
	<ol style="list-style-type: none"> <li>1. Low Glycemic Index</li> </ol>	<ul style="list-style-type: none"> <li>• Must have a GI value of 55 and below.</li> </ul>
Sugar	<ol style="list-style-type: none"> <li>1. No Added Sugar</li> <li>2. Without Added Sugar</li> </ol>	<ul style="list-style-type: none"> <li>• No free sugars or ingredients with free sugars (whether naturally occurring or added), including honey, malt and malt extract, with the exception of sugar alcohols and sweetening substances, are added during processing.</li> </ul>
	<ol style="list-style-type: none"> <li>1. Unsweetened</li> </ol>	<ul style="list-style-type: none"> <li>• No added free sugars or ingredients with free sugars, (whether naturally-occurring or added) including honey, malt, malt extract, sweetening substances or sugars alcohols, are added during processing.</li> </ul>
	<ol style="list-style-type: none"> <li>1. Sugar Free</li> <li>2. Free of Sugar</li> <li>3. Lactose Free</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\leq 0.5</math> g sugars per 100 g or 100 ml</li> </ul> <p><u>Meal Type Product</u></p> <ul style="list-style-type: none"> <li>• <math>\leq 0.5</math> g sugars per serving</li> </ul>
	<ol style="list-style-type: none"> <li>1. Low Sugar</li> <li>2. Low in Sugar</li> <li>3. Lite in Sugar</li> <li>4. Light in Sugar</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\leq 5</math> g sugars per 100 g, or</li> <li>• <math>\leq 2.5</math> g sugars per 100 ml, or</li> <li>• <math>\leq 2</math> g sugars per serving</li> </ul>

Nutrient	Claim	Criteria
	<ol style="list-style-type: none"> <li>1. Less Sugar</li> <li>2. Lower Sugar</li> <li>3. Lower in Sugar than ...</li> <li>4. Reduced Sugar</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 25\%</math> less sugar than the reference food</li> </ul>

## Appendix I: Fiber and wholegrain

<p><b>Definition</b></p>	<ul style="list-style-type: none"> <li>• <b>Dietary fibre:</b> Dietary fibre means carbohydrate polymers with ten or more monomeric units and nondigestible.</li> </ul> <p>Carbohydrate polymers with three to nine monomeric units, which are not hydrolysed by the endogenous enzymes in the small intestine of humans and belong to the following categories:</p> <ul style="list-style-type: none"> <li>- Edible carbohydrate polymers naturally occurring in the food as consumed.</li> <li>- 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.</li> <li>- Synthetic carbohydrate polymers which have been shown to have a physiological effect of benefit to health as demonstrated by generally accepted scientific evidence to competent authorities.</li> </ul> <ul style="list-style-type: none"> <li>• <b>Wholegrain:</b> Wholegrain means the intact grain or the dehulled, ground, milled, cracked, or flaked grain where the constituents (endosperm, germ and bran) are present in such proportions that represent the typical ration of those constituents occurring in the whole cereal, and includes wholemeal.</li> </ul> <p>Food products are not allowed to be labelled as “wholegrain” unless they fall within or are made from ingredients that fall within the definition of “wholegrain”, and the term “wholegrain” is qualified immediately by words indicating the percentage of wholegrain ingredients used.</p>
<p><b>Notes on wholegrain claim</b></p>	<p>In addition, under regulation 40A of the Food Regulations, the following must be met:</p> <ul style="list-style-type: none"> <li>• food product falls within or is made from ingredients falling within the definition of “wholegrain”; and</li> <li>• the word “wholegrain” (or other words conveying that meaning) is qualified immediately by words indicating the percentage of wholegrain ingredients used.</li> </ul>



<b>Notes on reference food</b>	Please refer to the glossary section for the detailed definition of the terms.
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<b>Nutrient</b>	<b>Claim</b>	<b>Criteria</b>
Fiber	<ol style="list-style-type: none"> <li>1. Source of Dietary Fibre</li> <li>2. Contains Dietary Fibre</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 1.5</math> g per 100 kcal, or</li> <li>• <math>\geq 3</math> g per 100 g, or</li> <li>• <math>\geq 3</math> g per 100 ml</li> </ul>
	<ol style="list-style-type: none"> <li>1. High in Dietary Fibre</li> <li>2. High Source of Dietary Fibre</li> <li>3. Good Source of Dietary Fibre</li> <li>4. Fibre-Rich</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 4</math> g per serving, or</li> <li>• <math>\geq 3</math> g per 100 kcal, or</li> <li>• <math>\geq 6</math> g per 100 g, or</li> <li>• <math>\geq 6</math> g per 100 ml</li> </ul>
	<ol style="list-style-type: none"> <li>1. More / Increased / Fortified / Enriched / Added Dietary Fibre</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 25\%</math> more dietary fibre than the reference food</li> </ul>
Wholegrain	<ol style="list-style-type: none"> <li>1. Higher in Wholegrains</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 10\%</math> wholegrains</li> </ul>

## Appendix I: Fats and cholesterol

<b>Definition</b>	<ul style="list-style-type: none"> <li>• <b>Total Fat:</b> Total fat should include saturated fat, trans fat, monounsaturated and polyunsaturated fats.</li> <li>• <b>Fatty Acids:</b> <ul style="list-style-type: none"> <li>- <i>Monounsaturated fatty acids</i> - Fatty acids that contain one double bond between carbon atoms, e.g. palmitoleic acid and oleic acid.</li> <li>- <i>Polyunsaturated fatty acids</i> - Fatty acids that contain two or more double bonds between carbon atoms, e.g. linoleic acid and linolenic acid.</li> </ul> </li> <li>• <b>Cholesterol:</b> Dietary cholesterol is a waxy, fat-like structure that is consumed from food</li> </ul>
<b>Notes on fat free claim</b>	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.
<b>Notes on cholesterol-free claim</b>	Claims stating or implying that a product is of certain percent cholesterol-free (e.g. 20% cholesterol free) are considered misleading.
<b>Notes on Low Cholesterol, Light in Cholesterol, Low in Cholesterol, Lite in Cholesterol</b>	<i>Trans</i> fatty acids must be counted (or calculated) as saturated fatty acids for this claim.
<b>Notes on reference food and meal type product</b>	Please refer to the glossary section for the detailed definition of the terms.

<b>Nutrient</b>	<b>Claim</b>	<b>Criteria</b>
Total Fat	<ol style="list-style-type: none"> <li>1. Fat Free</li> <li>2. Contains No Fat</li> <li>3. Free of Fat</li> </ol>	<ul style="list-style-type: none"> <li>• ≤ 0.15 g fat per 100 g or 100 ml of food</li> </ul> <p style="text-align: center;"><u>Meal Type Product</u></p> <ul style="list-style-type: none"> <li>• ≤ 0.5 g of fat per serving</li> </ul>

Nutrient	Claim	Criteria
	<ol style="list-style-type: none"> <li>1. Low Fat</li> <li>2. Low in Fat</li> <li>3. Light in Fat</li> <li>4. Lite in Fat</li> </ol>	<ul style="list-style-type: none"> <li>• ≤ 3 g fat per 100 g, or</li> <li>• ≤ 1.5 g fat per 100 ml</li> </ul>
	<ol style="list-style-type: none"> <li>1. Reduced Fat</li> <li>2. Lower Fat</li> <li>3. Reduced in Fat</li> <li>4. Lower in Fat</li> <li>5. Less Fat than...</li> <li>6. A certain % less</li> </ol>	<ul style="list-style-type: none"> <li>• ≥ 25% less fat than the reference food</li> </ul>
	<ol style="list-style-type: none"> <li>1. Lean Meat</li> </ol>	<ul style="list-style-type: none"> <li>• &lt; 10 g total fat &lt; 4 g saturated fat, and &lt; 95 mg cholesterol per 100 g of food</li> </ul>
	<ol style="list-style-type: none"> <li>1. Extra Lean Meat</li> </ol>	<ul style="list-style-type: none"> <li>• &lt; 5 g total fat, &lt; 2 g saturated fat, and &lt; 95 mg cholesterol per 100 g of food</li> </ul>
Fatty Acids	<ol style="list-style-type: none"> <li>1. Saturated Fat Free</li> <li>2. Free of Saturated Fat</li> </ol>	<ul style="list-style-type: none"> <li>• ≤ 0.5 g of saturated fatty acids per 100 g, and ≤1% of the total fat is trans fatty acids</li> </ul>
	<ol style="list-style-type: none"> <li>1. Low Saturated Fat</li> <li>2. Low in Saturated Fat</li> </ol>	<ul style="list-style-type: none"> <li>• ≤ 1.5 g saturated fats per 100 g, and ≤10% of kilocalories from saturated fats, or</li> <li>• ≤ 0.75 g of saturated fats per 100 ml, and ≤ 10% of kilocalories from saturated fats</li> </ul> <p>Trans fatty acids should be counted as saturated fatty acids for this claim</p>

Nutrient	Claim	Criteria
	<ol style="list-style-type: none"> <li>1. A certain % less</li> <li>2. Reduced in Saturated Fat Lower in Saturated Fat Reduced Saturated Fat</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 25\%</math> less saturated fat than the reference food</li> </ul> <p>Trans fatty acids should be counted as saturated fatty acids for this claim</p>
	<ol style="list-style-type: none"> <li>1. Contains Polyunsaturated Fats</li> <li>2. Source of Polyunsaturates</li> <li>3. (or Polyunsaturated Fatty Acids or Polyunsaturates)</li> <li>4. Presence of Polyunsaturates</li> </ol>	<ul style="list-style-type: none"> <li>• <math>&gt; 40\%</math> total fat shall be polyunsaturated fatty acids, <math>&lt; 20\%</math> total fat shall be saturated fatty acids and <math>&gt; 25\%</math> kilocalories shall be derived from fat</li> </ul>
	<ol style="list-style-type: none"> <li>1. High in Polyunsaturated Fats (or Polyunsaturated Fatty Acids or Polyunsaturates)</li> </ol>	<ul style="list-style-type: none"> <li>• <math>&gt;40\%</math> total fat shall be polyunsaturated fatty acids, <math>&lt; 20\%</math> total fat shall be saturated fatty acids and <math>&gt; 50\%</math> kilocalories shall be derived from fat</li> </ul>
	<ol style="list-style-type: none"> <li>1. Increased Polyunsaturated Fats</li> <li>2. More Polyunsaturated Fats</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 25\%</math> more polyunsaturated fatty acids than the reference food</li> </ul>
	<ol style="list-style-type: none"> <li>1. Contains Monounsaturated Fats</li> <li>2. Source of Monounsaturates (or Monounsaturated Fatty Acids or Monounsaturates)</li> <li>3. Presence of Monounsaturates</li> </ol>	<ul style="list-style-type: none"> <li>• <math>&gt; 40\%</math> total fat shall be monounsaturated fatty acids, <math>&lt; 20\%</math> total fat shall be saturated fatty acids and <math>&gt; 25\%</math> kilocalories shall be derived from fat</li> </ul>
	<ol style="list-style-type: none"> <li>1. High in Monounsaturated Fats (or Monounsaturated Fatty Acids or Monounsaturates)</li> </ol>	<ul style="list-style-type: none"> <li>• <math>&gt; 40\%</math> total fat shall be monounsaturated fatty acids, <math>&lt; 20\%</math> total fat shall be saturated fatty acids and <math>&gt; 50\%</math> kilocalories shall be derived from fat</li> </ul>
	<ol style="list-style-type: none"> <li>1. Increased Monounsaturated Fats</li> <li>2. More Monounsaturated Fats</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 25\%</math> more monounsaturated fatty acids compared with reference food</li> </ul>

Nutrient	Claim	Criteria
	<ol style="list-style-type: none"> <li>1. Trans Fat Free</li> <li>2. Free of Trans Fat</li> </ol>	<ul style="list-style-type: none"> <li>• &lt; 0.5 g of trans fatty acids per 100 g</li> </ul>
	<ol style="list-style-type: none"> <li>1. No Added Trans Fat</li> <li>2. Without Added Trans Fat</li> </ol>	<ul style="list-style-type: none"> <li>• No trans-fat or ingredients with trans fat (whether naturally-occurring or added), are added during processing.</li> </ul>
Cholesterol	<ol style="list-style-type: none"> <li>1. Cholesterol Free</li> <li>2. No Cholesterol</li> <li>3. Free of Cholesterol</li> </ol>	<p><u>Food that are derived solely from plant source.</u></p> <ul style="list-style-type: none"> <li>• 0 mg of cholesterol per 100 g food</li> </ul> <p><u>Other food products</u></p> <ul style="list-style-type: none"> <li>• &lt; 5 mg of cholesterol per 100 g food, and meets the conditions for a 'low saturated fatty acids' food</li> </ul>
	<ol style="list-style-type: none"> <li>1. Low Cholesterol</li> <li>2. Light in Cholesterol</li> <li>3. Low in Cholesterol</li> <li>4. Lite in Cholesterol</li> </ol>	<ul style="list-style-type: none"> <li>• ≤ 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</li> <li>• ≤ 10 mg of cholesterol per 100 ml and ≤ 0.75 g of saturated fats per 100 ml, and ≤ 10% of kilocalories from saturated fats</li> </ul>
	<ol style="list-style-type: none"> <li>1. A certain % less</li> <li>2. Reduced in Cholesterol</li> <li>3. Lower in Cholesterol</li> <li>4. Reduced Cholesterol</li> </ol>	<ul style="list-style-type: none"> <li>• ≥ 25% less cholesterol than the reference food</li> </ul>

## Appendix I: Sodium

<b>Definition</b>	<ul style="list-style-type: none"> <li>Salt is defined as a mineral substance primarily composed of sodium chloride (NaCl).</li> </ul>
<b>Notes on salt/sodium free claim</b>	Claims stating or implying that a product is of a certain percent sodium/salt free (e.g. 20% sodium / salt free) are considered misleading.
<b>Notes on reference food</b>	Please refer to the glossary section for the detailed definition of the terms.

<b>Nutrient</b>	<b>Claim</b>	<b>Criteria</b>
Sodium	<ol style="list-style-type: none"> <li>No Added Salt</li> <li>No Salt Added</li> <li>Unsalted</li> </ol>	<ul style="list-style-type: none"> <li>No sodium chloride, sodium compounds, or any ingredient containing added sodium chloride or other sodium compounds, should be added to the food</li> </ul>
	<ol style="list-style-type: none"> <li>Salt Free</li> <li>Sodium Free</li> </ol>	<ul style="list-style-type: none"> <li>≤ 5 mg sodium per 100 g</li> </ul>
	<ol style="list-style-type: none"> <li>Low in Salt</li> <li>Low Sodium</li> <li>Light in Salt</li> <li>Low Salt</li> <li>Light in Sodium</li> <li>Lite in Salt</li> <li>Low in Sodium</li> <li>Lite in Sodium</li> <li>Lightly Salted</li> </ol>	<ul style="list-style-type: none"> <li>≤ 120 mg sodium per 100 g</li> </ul>
	<ol style="list-style-type: none"> <li>Very Low in Salt</li> <li>Very Low in Sodium</li> </ol>	<ul style="list-style-type: none"> <li>≤ 40 mg sodium per 100 g</li> </ul>

Nutrient	Claim	Criteria
	<ol style="list-style-type: none"> <li>1. A certain % less</li> <li>2. Reduced Salt</li> <li>3. Lower in Salt</li> <li>4. Lower in Sodium</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 25\%</math> less sodium compared to reference food</li> </ul>

## Appendix I: Vitamin and mineral

<b>Definition</b>	<ul style="list-style-type: none"> <li>• Vitamin: Organic nutrient that the body needs in small amounts to function and stay healthy. For example, Vitamin C.</li> <li>• Minerals: Inorganic nutrients that are necessary for various body functions. For example, calcium.</li> </ul>
<b>Notes on Vitamin A, Vitamin D and mineral</b>	<ul style="list-style-type: none"> <li>• When vitamin A 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.</li> <li>• When vitamin D is added to food the addition must not increase the content of vitamin D to more than 10 mcg of cholecalciferol</li> <li>• When any mineral is added to a food, the addition must not increase the content of the minerals to more than three times the daily allowance (as specified in Figure 5) for that mineral per reference quantity (as specified in Figure 6) for that food as specified in the Food Regulations.</li> </ul> <p><i>(The information provided in the vitamins/minerals section was adapted from the Sale of Food Act, Cap. 283, Food Regulations, Regulation 11).</i></p>
<b>Notes on reference quantity and daily allowance</b>	<ul style="list-style-type: none"> <li>• Please refer to Figure 5 for the specific vitamin and mineral daily allowance.</li> <li>• Please refer to Figure 6 for the reference quantity of the food</li> </ul>
<b>Notes on vitamins and minerals not listed in Figure 5</b>	<ul style="list-style-type: none"> <li>• For claims on the presence of vitamins and minerals that are not listed under Table I of Regulation 11 under the Food Regulations (please refer to Figure 5), you may refer to the criteria published in the Codex guidelines established by the international food standards setting body, the Codex Alimentarius Commission.</li> </ul>



Nutrient	Claim	Criteria
Vitamin/Mineral	1. Source/Contain/added with/with/presence of a vitamin / mineral	<ul style="list-style-type: none"> <li>Reference quantity should contain at least 1/6 of the daily allowance</li> </ul>
	1. Excellent source/Enriched/ Fortified/Ennobled/ Vitaminised/High/Good/Rich of a vitamin/mineral	<ul style="list-style-type: none"> <li>Reference quantity should contain at least 50% of the daily allowance</li> </ul>

Figure 5: Daily Allowance of Vitamins and Minerals

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, nicotinic acid, nicotinamide	Milligrams of niacin	16 mg
Vitamin C, ascorbic acid	Milligrams of ascorbic acid	30 mg
Vitamin D, vitamin D2, vitamin D3	Micrograms of cholecalciferol	2.5 mcg
Calcium	Milligrams of calcium	800 mg

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

Figure 6: Reference Quantity

<b>Food</b>	<b>Reference Quantity</b>
Bread	240 g
Breakfast cereals	60 g
Extracts of meat or vegetables or yeast (modified or not)	10 g
Fruit and vegetable juices	200 ml
Fruit juice concentrates (diluted according to directions on the label)	200 ml
Fruit juice cordials (diluted according to directions on the label)	200 ml
Flavoured cordials or syrups (diluted according to directions on the label)	200 ml
Malted milk powder	30 g
Condensed milk	180 g
Milk powder (full cream or skimmed) and food containing not less than 51% of milk powder	60 g
Other concentrated liquid food including powdered beverage above (diluted according to directions on the label)	200mL
Liquid food not specified above	200mL
Solid food not specified above	120g

## Appendix II: List of health claims and criteria

### Appendix II: Nutrient-function claim

<b>Notes on usage</b>	<ul style="list-style-type: none"> <li>The amount of the claimed nutrient must be declared in the nutrition information panel.</li> </ul>
<b>Notes on reference quantity and daily allowance</b>	<ul style="list-style-type: none"> <li>Please refer to Figure 5 for the specific vitamin and mineral daily allowance.</li> <li>Please refer to Figure 6 for the reference quantity of the food</li> </ul>

<b>Macronutrients</b>		
<b>Nutrient</b>	<b>Claim</b>	<b>Criteria</b>
Protein	1. Protein provides the essential amino acids needed to aid in the building and maintenance of body tissues.	<ul style="list-style-type: none"> <li>At least 12% by weight of calorie yield of food is derived from protein</li> <li>The amount of food to be consumed per day contains at least 10g of protein</li> <li>The quantity of food to be consumed per day must be declared</li> </ul>
	2. Protein helps in tissue building and growth	
Lactose	1. Low lactose content allows easier digestion	<ul style="list-style-type: none"> <li>≤ 5g lactose in per 100g of solid food; or ≤ 2.5g lactose in per 100ml of liquid food</li> </ul>
	2. Low lactose content eases digestion for people who are lactose intolerant	
Dietary Fibre	1. Dietary fibre aids in digestive system	<ul style="list-style-type: none"> <li>≥ 3g per 100g of solid food or 100ml of liquid food</li> </ul>

<b>Micronutrients: Vitamin</b>		
<b>Nutrient</b>	<b>Claim</b>	<b>Criteria</b>
Vitamin A (calculated as retinol activity)	1. Vitamin A is essential for the functioning of the eye	<ul style="list-style-type: none"> <li>≥ 125mcg of vitamin A in per reference quantity of the food</li> </ul>

<b>Micronutrients: Vitamin</b>		
<b>Nutrient</b>	<b>Claim</b>	<b>Criteria</b>
	2. Vitamin A helps to maintain normal skin and mucous membrane. 3. Vitamin A contributes to the normal function of the immune system	as specified in Figure 6: Reference Quantity.
Vitamin B1 (thiamin)	1. Vitamin B1 helps to release energy from proteins, fats and carbohydrates 2. Vitamin B1 contributes to normal functioning of the nervous system 3. Vitamin B1 contributes to the normal functioning of the heart	<ul style="list-style-type: none"> <li>• <math>\geq 0.167</math>mg of thiamin in per reference quantity of the food as specified in Figure 6: Reference Quantity.</li> </ul>
Vitamin B2 (riboflavin)	1. Vitamin B2 helps to release energy from proteins, fats and carbohydrates 2. Vitamin B2 contributes to the reduction of tiredness and fatigue 3. Vitamin B2 contributes to the maintenance of normal skin 4. Vitamin B2 contributes to the maintenance of normal red blood cells 5. Vitamin B2 contributes to maintenance normal vision 6. Vitamin B2 contributes to normal functioning of the nervous system 7. Vitamin B2 contributes to the protection of cells from oxidative stress	<ul style="list-style-type: none"> <li>• <math>\geq 0.25</math>mg of riboflavin in per reference quantity of the food as specified in Figure 6: Reference Quantity.</li> </ul>
Vitamin B3 (niacin)	1. Vitamin B3 helps to release energy from proteins, fats and carbohydrates	<ul style="list-style-type: none"> <li>• <math>\geq 2.67</math>mg of niacin in per reference quantity of the food</li> </ul>

Micronutrients: Vitamin		
Nutrient	Claim	Criteria
	2. Vitamin B3 contributes to the reduction of tiredness and fatigue 3. Vitamin B3 contributes to the maintenance of normal skin 4. Vitamin B3 contributes to normal functioning of the nervous system	as specified in Figure 6: Reference Quantity.
Vitamin B5 (Pantothenic acid)	1. Pantothenic acid contributes to normal energy productions 2. Pantothenic acid contributes to the reduction of tiredness and fatigue 3. Pantothenic acid contributes to normal mental performance	<ul style="list-style-type: none"> <li>• <math>\geq 0.75</math>mg of pantothenic acid in per 100g of food, or <math>\geq 0.38</math>mg pantothenic in per 100ml of food</li> </ul>
Vitamin B6 (pyridoxine)	1. Vitamin B6 is important for the production of energy 2. Vitamin B6 contributes to the reduction of tiredness and fatigue 3. Vitamin B6 contributes to normal functioning of the nervous system 4. Vitamin B6 contributes to the normal red blood cell formation 5. Vitamin B6 contributes to the normal function of the immune system 6. Vitamin B6 contributes to normal homocysteine metabolism 7. Vitamin B6 contributes to the regulation of hormonal activity	<ul style="list-style-type: none"> <li>• <math>\geq 0.33</math>mg of pyridoxine in per reference quantity of the food as specified in Figure 6: Reference Quantity.</li> </ul>

<b>Micronutrients: Vitamin</b>		
<b>Nutrient</b>	<b>Claim</b>	<b>Criteria</b>
Vitamin B12 (cyanocobalamin)	1. Vitamin B12 is necessary for fat, carbohydrate and protein metabolism	<ul style="list-style-type: none"> <li>• <math>\geq 0.33</math>mcg of cyanocobalamin in per reference quantity of the food as specified in Figure 6: Reference Quantity.</li> </ul>
	2. Vitamin B12 is needed for/helps in the formation of red blood cells	
	3. Vitamin B12 contributes to the reduction of tiredness and fatigue	
	4. Vitamin B12 contributes to normal functioning of the nervous system	
	5. Vitamin B12 contributes to the normal function of the immune system	
	6. Vitamin B12 contributes to normal homocysteine metabolism	
Folate (folic acid)	1. Folate contributes to normal immune system function	<ul style="list-style-type: none"> <li>• <math>\geq 33.33</math>mcg of folic acid in per reference quantity of the food as specified in Figure 6: Reference Quantity.</li> </ul>
	2. Folate contributes to the reduction of tiredness and fatigue	
	3. Folate contributes to normal homocysteine metabolism	
	4. Folate contributes to normal amino acid synthesis	
Folate (folic acid) – claims for food for pregnant women only	5. Folate helps support foetus' growth and overall development	
	6. Folate plays a role in the formation of red blood cells	
	7. Folate, taken before and during early pregnancy, helps in the mental/normal and overall development of foetus	

Micronutrients: Vitamin		
Nutrient	Claim	Criteria
	8. Folic acid is essential/important for growth and division of cells	
Vitamin C	1. Vitamin C enhances absorption of iron from non-meat products	<ul style="list-style-type: none"> <li>• <math>\geq 5\text{mg}</math> of vitamin C in per reference quantity of the food as specified in Figure 6: Reference Quantity</li> </ul>
	2. Vitamin C contributes to normal collagen formation for the normal function of blood vessels	
	3. Vitamin C contributes to normal collagen formation for the normal function of bones	
	4. Vitamin C contributes to normal collagen formation for the normal function of cartilage	
	5. Vitamin C contributes to normal collagen formation for the normal function of gums	
	6. Vitamin C contributes to normal collagen formation for the normal function of skin	
	7. Vitamin C contributes to normal collagen formation for the normal function of teeth	
	8. Vitamin C contributes to normal functioning of the immune system	
	9. Vitamin C contributes to normal functioning of the nervous system	
	10. Vitamin C contributes to the reduction of tiredness and fatigue	
	11. Vitamin C contributes to the protection of cells from oxidative stress	

## Micronutrients: Vitamin

Nutrient	Claim	Criteria
Vitamin D	1. Vitamin D helps support calcium absorption and improves bone strength	<ul style="list-style-type: none"> <li>• <math>\geq 0.42\text{mcg}</math> of vitamin D in per reference quantity of the food as specified in Figure 6: Reference Quantity</li> </ul>
	2. Vitamin D helps the body utilise calcium and phosphorus	
	3. Vitamin D contributes to normal blood calcium levels	
	4. Vitamin D contributes to the maintenance of normal muscle function	
	5. Vitamin D contributes to the maintenance of normal teeth	
	6. Vitamin D contributes to the normal function of the immune system	
Vitamin E	1. Vitamin E is an antioxidant that helps protect cells in the body	<ul style="list-style-type: none"> <li>• <math>\geq 1.67\text{mg}</math> of vitamin E in per reference quantity of the food as specified in Figure 6: Reference Quantity</li> </ul>
	2. Antioxidants like vitamin E help to protect cells from free radicals that may have escaped the natural process of our body system	
Vitamin K	1. Vitamin K is necessary for normal blood coagulation	<ul style="list-style-type: none"> <li>• <math>\geq 9\text{mcg}</math> of vitamin K in per 100g of food, or <math>\geq 4.5\text{mcg}</math> vitamin K in per 100ml of food</li> </ul>
Biotin	1. Biotin contributes to normal energy-yielding metabolism	<ul style="list-style-type: none"> <li>• <math>\geq 4.5\text{mcg}</math> of biotin in per 100g of food, or <math>\geq 2.25\text{mcg}</math> biotin in per 100ml of food</li> </ul>
	2. Biotin contributes to normal macronutrient metabolism	



<b>Micronutrients: Vitamin</b>		
<b>Nutrient</b>	<b>Claim</b>	<b>Criteria</b>
	3. Biotin contributes to the maintenance of normal hair	
Choline	1. Choline contributes to normal lipid metabolism	<ul style="list-style-type: none"> <li>• <math>\geq 82.5\text{mg}</math> of choline in per 100g or 100ml or per single serving of food</li> </ul>
	2. Choline contributes to the maintenance of normal liver function	
Choline - <i>claims only for food for children up to 6 years of age</i>	3. Choline helps support overall mental functioning for children up to 6 years of age	<ul style="list-style-type: none"> <li>• Food must be labelled clearly for this age group</li> </ul>
<b>Combined vitamin claims</b>		
Vitamin K and D	1. Vitamins K and D work synergistically on bone metabolism to improve bone strength/build strong bones	<ul style="list-style-type: none"> <li>• <math>\geq 0.42\text{mcg}</math> of vitamin D in per reference quantity of the food as specified in Figure 6: Reference Quantity</li> <li>• <math>\geq 9\text{mcg}</math> of vitamin K in per 100g of food, or <math>\geq 4.5\text{mcg}</math> vitamin K in per 100ml of food</li> </ul>

<b>Micronutrients: Minerals</b>		
<b>Nutrient</b>	<b>Claim</b>	<b>Criteria</b>
Calcium	1. Calcium helps build/to support development of strong bones and teeth.	<ul style="list-style-type: none"> <li>• <math>\geq 133.33\text{mg}</math> of calcium in per reference quantity of the food as specified in Figure 6: Reference Quantity</li> </ul>
	2. Calcium contributes to normal energy metabolism.	
	3. Calcium is necessary for normal nerve and muscle function.	
	4. Calcium is necessary for normal blood coagulation.	
Iodine	1. Iodine is essential for the synthesis of thyroid hormones by the thyroid gland.	<ul style="list-style-type: none"> <li>• <math>\geq 16.67\text{mcg}</math> of iodine in per reference quantity of the food</li> </ul>

Micronutrients: Minerals		
Nutrient	Claim	Criteria
	2. Iodine is necessary for normal energy metabolism. 3. Iodine contributes to normal cognitive function. 4. Iodine contributes to the maintenance of normal skin.	as specified in Figure 6: Reference Quantity
Iron	1. Iron is an important component of red blood cells which carry oxygen to all parts of the body to help the body's production of energy 2. Iron is needed to produce haemoglobin, the protein in red blood cells that carries oxygen to tissues 3. Iron is needed to produce myoglobin, the protein that helps supply oxygen to muscle 4. Iron contributes to normal cognitive function / development 5. Iron contributes to normal energy production 6. Iron contributes to the reduction of tiredness and fatigue 7. Iron is necessary for normal immune system function 8. Iron is necessary for normal cell division	<ul style="list-style-type: none"> <li>• <math>\geq 1.67</math>mg of iron in per reference quantity of the food as specified in Figure 6: Reference Quantity</li> </ul>
Iron - <i>claims only for food for children up to 6 years of age</i>	9. Iron support the child's natural defenses for children up to 6 years of age	<ul style="list-style-type: none"> <li>• Food must be labelled clearly for this age group</li> </ul>
Phosphorus	1. Phosphorus contributes to bone development	<ul style="list-style-type: none"> <li>• <math>\geq 133.33</math>mg of phosphorus in per reference quantity of the</li> </ul>

Micronutrients: Minerals		
Nutrient	Claim	Criteria
	<ol style="list-style-type: none"> <li>2. Phosphorus contributes to normal energy metabolism</li> <li>3. Phosphorus contributes to the maintenance of normal teeth</li> </ol>	<p>food as specified in Figure 6: Reference Quantity</p>
Magnesium	<ol style="list-style-type: none"> <li>1. Magnesium helps in the absorption and retention of calcium</li> <li>2. Magnesium contributes to energy metabolism and the maintenance of bone and teeth</li> <li>3. Magnesium is necessary for normal nerve and muscle function</li> <li>4. Magnesium is necessary for normal electrolyte balance</li> <li>5. Magnesium contributes to a reduction of tiredness and fatigue</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 46.5</math>mg of magnesium in per 100g of solid food, or <math>\geq 23.25</math>mg of magnesium in per 100ml of liquid food</li> </ul>
Zinc	<ol style="list-style-type: none"> <li>1. Zinc is essential for growth</li> <li>2. Zinc contributes to normal metabolism of fatty acids</li> <li>3. Zinc contributes to the maintenance of normal bones</li> <li>4. Zinc contributes to the maintenance of normal hair</li> <li>5. Zinc contributes to the maintenance of normal nails</li> <li>6. Zinc contributes to the maintenance of normal vision</li> <li>7. Zinc contributes to normal cognitive function</li> <li>8. Zinc contributes to the normal macronutrient metabolism</li> </ol>	<ul style="list-style-type: none"> <li>• <math>\geq 1.65</math>mg of zinc in per 100g of solid food, or <math>\geq 0.83</math>mg of zinc in per 100ml of liquid food</li> </ul>

Micronutrients: Minerals		
Nutrient	Claim	Criteria
	9. Zinc contributes to the normal carbohydrate metabolism	
	10. Zinc contributes to the normal protein synthesis	
	11. Zinc contributes to the normal metabolism of Vitamin A	
	12. Zinc is necessary for cell division	
	13. Zinc is necessary for normal immune system function	
Zinc - <i>claims only for food for children up to 6 years of age</i>	14. Zinc helps in physical development for children up to 6 years of age	<ul style="list-style-type: none"> <li>• Food must be labelled clearly for this age group</li> </ul>
	15. Zinc support the child's natural defenses for children up to 6 years of age	
Selenium	1. Selenium contributes to the maintenance of normal hair	<ul style="list-style-type: none"> <li>• <math>\geq 9\text{mcg}</math> of selenium in per 100g of food, or <math>\geq 4.5\text{mcg}</math> selenium in per 100ml of food</li> </ul>
	2. Selenium contributes to the maintenance of normal nails	
	3. Selenium contributes to the maintenance of the normal function of the immune system	
	4. Selenium contributes to the protection of cells from oxidative stress	
Potassium	1. Potassium contributes to normal muscle function	<ul style="list-style-type: none"> <li>• <math>\geq 525\text{mg}</math> of potassium in per 100g of food, or <math>\geq 263\text{mg}</math> potassium in per 100ml of food</li> </ul>
	2. Potassium contributes to normal functioning of the nervous system	

<b>Micronutrients: Minerals</b>		
<b>Nutrient</b>	<b>Claim</b>	<b>Criteria</b>
Copper	1. Copper contributes to normal energy production	<ul style="list-style-type: none"> <li>• <math>\geq 135\text{mcg}</math> of copper in per 100g of food, or <math>\geq 67.5\text{mcg}</math> copper in per 100ml of food</li> </ul>
	2. Copper contributes to normal functioning of the nervous system	
	3. Copper contributes to the normal functioning of the immune system	
	4. Copper contributes to the normal hair pigment	
	5. Copper contributes to normal skin pigmentation	

## Appendix II: Other function claims

Nutrients / Food constituents	Claims	Criteria
Chromium	1. Chromium contributes to normal macronutrient metabolism	<ul style="list-style-type: none"> <li>• <math>\geq 6\text{mcg}</math> in per 100g or 100ml of food</li> <li>• The amount of chromium must be declared under the nutrition information panel.</li> </ul>
Collagen	1. Collagen is a protein in connective tissues found in skin, bones and muscles	<ul style="list-style-type: none"> <li>• The addition of collagen has to be disclosed under the statement of ingredients.</li> </ul>
Docosahexaenoic acid (DHA) and Arachidonic acid (ARA) – <i>claim only for food for children up to 3 years of age</i>	1. DHA and ARA are important building blocks for development of the brain and eyes for children up to 3 years of age.	<ul style="list-style-type: none"> <li>• Food must be labelled clearly for this age group.</li> <li>• The amounts of DHA and ARA must be declared under the nutrition information panel.</li> </ul>
Nucleotides - <i>claim only for food for children up to 6 years of age</i>	1. Nucleotides are essential to normal cell function and replication, which are important for the overall growth and development of children up to 6 years of age	<ul style="list-style-type: none"> <li>• Food must be labelled clearly for this age group.</li> <li>• The amounts of nucleotides must be declared under the nutrition information panel.</li> </ul>
Taurine - <i>claim only for food for children up to 6 years of age</i>	1. Taurine helps to support overall mental and physical development for children up to 6 years of age	<ul style="list-style-type: none"> <li>• Food must be labelled clearly for this age group.</li> <li>• The amount of taurine must be declared under the nutrition information panel.</li> </ul>
Inulin	1. Inulin helps in calcium absorption	<ul style="list-style-type: none"> <li>• <math>\geq 133.33\text{mg}</math> of calcium in per reference quantity of the food as specified in Figure 6: Reference Quantity</li> <li>• The amount of calcium must be declared under the nutrition information panel.</li> <li>• The amount of inulin present in each serving or other equivalents of the product</li> </ul>

Nutrients / Food constituents	Claims	Criteria
	<ol style="list-style-type: none"> <li>2. Inulin helps support growth or beneficial bacteria/good intestinal flora in gut</li> <li>3. Inulin helps increase intestinal bifidobacteria and helps maintain a good intestinal environment</li> </ol>	<p>must be declared on the product label.</p> <ul style="list-style-type: none"> <li>• Food manufacturer/importer to ensure that the amount and combinations of shorter and longer chain inulin present in the product can bring about the claimed effect.</li> <li>• Food manufacturer/importer to ensure that the amount of inulin present in the product can bring about the claimed effect.</li> </ul>
Oligofructose (Fructo-oligosaccharides)	<ol style="list-style-type: none"> <li>1. Oligofructose stimulates the bifidobacteria, resulting in a significant increase of the beneficial bifidobacteria in the intestinal tract. At the same time, the presence of less desirable bacteria is significantly reduced</li> </ol>	<ul style="list-style-type: none"> <li>• Food manufacturer/importer to ensure that the amount of the oligofructose present in the product can bring about the claimed effect.</li> </ul>
Prebiotics	<ol style="list-style-type: none"> <li>1. Prebiotic promotes the growth of good <i>Bifidus</i> bacteria to help maintain a healthy digestive system</li> </ol>	<ul style="list-style-type: none"> <li>• The exact identity of the prebiotic must be declared on the product label.</li> <li>• Food manufacturer/importer to ensure that the amount of prebiotic present in the product can bring about the claimed effect.</li> </ul>
Prebiotic blend of Galacto-oligosaccharides and long chain Fructo-oligosaccharide	<ol style="list-style-type: none"> <li>1. Prebiotic blend (galacto-oligosaccharides and long chain fructo-oligosaccharides) support the child's natural defenses for children up to 6 years of age</li> </ol>	<ul style="list-style-type: none"> <li>• The combination of galacto-oligosaccharides and long chain Fructo-oligosaccharide present in the product must be in ratio of 9:1</li> </ul>

Nutrients / Food constituents	Claims	Criteria
Probiotics	<ol style="list-style-type: none"> <li>1. Probiotics to help maintain a healthy digestive system</li> <li>2. Probiotics helps in digestion</li> <li>3. Probiotics helps to maintain a desirable balance of beneficial bacterial in the digestive system</li> <li>4. Probiotics helps to suppress/fight against harmful bacteria in the digestive system, thereby helping to maintain a healthy digestive system</li> </ol>	<ul style="list-style-type: none"> <li>• The exact species of the probiotic present in the product must be declared on the product label</li> <li>• Food manufacturer/importer to ensure that the viable count of the probiotic present in the product can bring about the claimed effect.</li> </ul>
Plant sterols/stanols	<ol style="list-style-type: none"> <li>1. Plant sterols/stanols have been shown to lower/reduce blood cholesterol. High blood cholesterol is a risk factor in the development of coronary heart disease</li> </ol>	<ul style="list-style-type: none"> <li>• Phytosterols, phytosterol esters, phytostanols or phytostanol esters may only be added to — <ol style="list-style-type: none"> <li>a. any edible vegetable fat or oil containing not more than 20 g of saturated fat per 100 g of total fat;</li> <li>b. any margarine or fat spread containing not more than 27 g of saturated fat per 100 g of total fat; or</li> <li>c. any other food containing not more than 3 g of total fat per 100 g or 1.5 g of total fat per 100 ml.</li> </ol> </li> <li>• The following mandatory information must be declared on the product label: <ol style="list-style-type: none"> <li>a. The product is a special purpose food intended for people who want to lower their blood cholesterol level;</li> <li>b. The product may not be nutritionally appropriate for pregnant and breast-</li> </ol> </li> </ul>



Nutrients / Food constituents	Claims	Criteria
		<p>feeding women and children under the age of 5 years;</p> <p>c. The product should be used as part of a balanced and varied diet;</p> <p>d. Consumption in a day of a total of more than 3g of phytosterols and/or phytostanols does not provide any additional benefit in lowering blood cholesterol levels;</p> <p>e. Consumption in a day of a total of at least 2g of phytosterols and/or phytostanols has been shown to lower blood cholesterol levels; and</p> <p>f. A statement suggesting the amount of the food (in g or ml) to be consumed each time (referred to as a serving), and a statement of the total amount of phytosterols and phytostanols that each serving contains.</p>
Barley or Oat beta-glucan	1. Barley beta-glucans / Oat beta-glucans have been shown to lower/reduce blood cholesterol. High blood cholesterol is a risk factor in the development of coronary heart disease.	<ul style="list-style-type: none"> <li>• The cholesterol, saturated fatty acids and trans fatty acids present in the food must be within the following levels: <ul style="list-style-type: none"> <li>(i) in the case of solid food <ul style="list-style-type: none"> <li>—</li> <li>a. not more than 20 mg of cholesterol per 100 g;</li> <li>b. not more than 1.5 g of saturated fatty acids and</li> <li>c. trans fatty acids per 100 g; and</li> </ul> </li> </ul> </li> </ul>

Nutrients / Food constituents	Claims	Criteria
		<ul style="list-style-type: none"> <li>d. not more than 10% of kilocalories from</li> <li>e. saturated fatty acids and trans fatty acids;</li> <li>or</li> <li>(ii) in the case of liquid food — <ul style="list-style-type: none"> <li>a. not more than 10 mg of cholesterol per 100 ml;</li> <li>b. not more than 0.75 g of saturated fatty acids and</li> <li>c. trans fatty acids per 100 ml; and</li> <li>d. not more than 10% of kilocalories from</li> <li>e. saturated fatty acids and trans fatty acids.</li> </ul> </li> <li>• The following mandatory information must be declared on the product label: <ul style="list-style-type: none"> <li>a. a statement or statements to the like effect that consumption of at least 3 g of barley beta-glucans or oat beta-glucans (as the case may be) in a day has been shown to lower blood cholesterol levels; and</li> <li>b. the amounts of barley beta-glucan or oat beta-glucans (as the case may be), cholesterol, saturated fatty acids and trans fatty acids, present in the food under the nutrition information panel.</li> </ul> </li> </ul>

## Appendix II: Reduction of disease risk claims

Related Disease	Claim	Criteria
Musculoskeletal	1. A healthy diet with adequate calcium and vitamin D, with regular exercise, helps to achieve strong bones and may reduce the risk of osteoporosis. (Name of food) is a good source of/high in/enriched in/fortified with calcium.	<ul style="list-style-type: none"> <li>• At least 50% of calcium RDA, which is taken as 800mg and</li> <li>• Low in fat (<math>\leq 3g</math> fat per 100g or <math>\leq 1.5g</math> fat per 100ml) or Fat free (<math>\leq 0.15g</math> fat per 100g or 100ml)</li> </ul>
Cardiovascular	1. A healthy diet low in sodium may reduce the risk of high blood pressure, a risk factor for stroke and heart disease. (Name of food) is sodium free/low in/very low in/reduced in sodium.	<ul style="list-style-type: none"> <li>• No added salt or Salt/ sodium free (<math>\leq 5mg</math> sodium per 100g) or Very low in salt/ sodium (<math>\leq 40mg</math> per 100g) or Low in sodium (<math>\leq 120mg</math> per 100g) or Reduced sodium (if sodium content per reference quantity is <math>\leq 15\%</math> of sodium RDA of 2000mg)</li> </ul>
	2. A healthy diet low in saturated fat and trans fat, may reduce the risk of heart disease. (Name of food) is free of/ low in saturated fats, trans fats.	<ul style="list-style-type: none"> <li>• Low in saturated fat (<math>\leq 1.5g</math> saturated fat per 100g, and <math>\leq 10\%</math> of kilocalories from saturated fat) or Free of saturated fat (<math>\leq 0.5g</math> saturated fat per 100g, and <math>\leq 1\%</math> of the total fat is trans fat) and</li> <li>• Free of trans fat (<math>&lt; 0.5g</math> per 100g) and</li> <li>• Low in sugar (<math>\leq 5g</math> per 100g or <math>\leq 2.5g</math> per 100ml) or Sugar free (<math>\leq 0.5g</math> per 100g) or Unsweetened or No added sugar; and</li> <li>• Cholesterol at <math>\leq 100mg</math> per 100g and</li> <li>• Its reference quantity should not exceed 25% of sodium RDA, which is taken as</li> </ul>

Related Disease	Claim	Criteria
		2000mg
	<p>3. A healthy diet rich in whole grains, fruits and vegetables that contain dietary fibre, may reduce the risk of heart disease. (Name of food) is low/free of fat and high in dietary fibre.</p>	<ul style="list-style-type: none"> <li>• A product from these food groups - whole grains, fruit, vegetables or fibre fortified foods; and</li> <li>• Low in fat: ≤3g fat per 100g or ≤1.5g fat per 100ml, or Fat free: ≤0.15g fat per 100g or 100ml; and</li> <li>• High in dietary fibre: ≥3g per 100 kcal or ≥6g per 100g or 100ml; and</li> <li>• With at least 25% of the dietary fibre comprising soluble fibre.</li> </ul>
	<p>4. Plant sterols/stanols have been shown to lower/reduce blood cholesterol. High blood cholesterol is a risk factor in the development of coronary heart disease</p>	<ul style="list-style-type: none"> <li>• Phytosterols, phytosterol esters, phytostanols or phytostanol esters may only be added to — <ul style="list-style-type: none"> <li>a. any edible vegetable fat or oil containing not more than 20 g of saturated fat per 100 g of total fat;</li> <li>b. any margarine or fat spread containing not more than 27 g of saturated fat per 100 g of total fat; or</li> <li>c. any other food containing not more than 3 g of total fat per 100 g or 1.5 g of total fat per 100 ml.</li> </ul> </li> <li>• The following mandatory information must be declared on the product label: <ul style="list-style-type: none"> <li>a. The product is a special purpose food intended for people who want to</li> </ul> </li> </ul>

Related Disease	Claim	Criteria
		<p>lower their blood cholesterol level;</p> <p>b. The product may not be nutritionally appropriate for pregnant and breast-feeding women and children under the age of 5 years;</p> <p>c. The product should be used as part of a balanced and varied diet;</p> <p>d. Consumption in a day of a total of more than 3g of phytosterols and/or phytostanols does not provide any additional benefit in lowering blood cholesterol levels;</p> <p>e. Consumption in a day of a total of at least 2g of phytosterols and/or phytostanols has been shown to lower blood cholesterol levels; and</p> <p>f. A statement suggesting the amount of the food (in g or ml) to be consumed each time (referred to as a serving), and a statement of the total amount of phytosterols and phytostanols that each serving contains.</p>
	<p>5. Barley beta-glucans / Oat beta-glucans have been shown to lower/reduce blood cholesterol. High blood cholesterol is a risk factor in the development of coronary heart disease.</p>	<ul style="list-style-type: none"> <li>• The cholesterol, saturated fatty acids and trans fatty acids present in the food must be within the following levels: <ul style="list-style-type: none"> <li>(iii) in the case of solid food <ul style="list-style-type: none"> <li>—</li> <li>a. not more than 20 mg of cholesterol per 100 g;</li> </ul> </li> </ul> </li> </ul>

Related Disease	Claim	Criteria
		<ul style="list-style-type: none"> <li>b. not more than 1.5 g of saturated fatty acids and</li> <li>c. trans fatty acids per 100 g; and</li> <li>d. not more than 10% of kilocalories from</li> <li>e. saturated fatty acids and trans fatty acids; or</li> </ul> <p>(iv) in the case of liquid food</p> <p>—</p> <ul style="list-style-type: none"> <li>a. not more than 10 mg of cholesterol per 100 ml;</li> <li>b. not more than 0.75 g of saturated fatty acids and</li> <li>c. trans fatty acids per 100 ml; and</li> <li>d. not more than 10% of kilocalories from</li> <li>e. saturated fatty acids and trans fatty acids.</li> </ul> <ul style="list-style-type: none"> <li>• The following mandatory information must be declared on the product label: <ul style="list-style-type: none"> <li>a. a statement or statements to the like effect that consumption of at least 3 g of barley beta-glucans or oat beta-glucans (as the case may be) in a day has been shown to lower blood cholesterol levels; and</li> <li>b. the amounts of barley beta-glucan or oat beta-glucans (as the case may be), cholesterol, saturated fatty acids and trans fatty acids, present</li> </ul> </li> </ul>

Related Disease	Claim	Criteria
		in the food under the nutrition information panel.
Cancer	1. A healthy diet rich in fibre containing foods such as whole grains, fruits and vegetables may reduce the risk of some types of cancers. (Name of food) is free/ low in fat and high in dietary fibre.	<ul style="list-style-type: none"> <li>• A product from these food groups - whole grains, fruit, vegetables or fibre fortified foods; and</li> <li>• Low in fat (<math>\leq 3\text{g}</math> fat per 100g or <math>\leq 1.5\text{g}</math> fat per 100mL), or Fat free (<math>\leq 0.15\text{g}</math> fat per 100g or 100mL); and</li> <li>• High in dietary fibre (<math>\geq 3\text{g}</math> per 100kcal or <math>\geq 6\text{g}</math> per 100g); and</li> <li>• Reference quantity of the food product should not contain sodium in an amount exceeding 25% of sodium RDA, which is taken as 2000mg.</li> </ul>

## Appendix III: Examples of prohibited claims on food

A “claim” means any message or representation, and includes a pictorial, graphic or symbolic representation.

In general, a claim made to indicate the nature, stability, quantity, strength, purity, composition, weight, origin, age, effects or proportion of food or its ingredients must be truthful and should not create any erroneous impression on the value, merit, or safety of the food. Food business operators must be able to substantiate for the claims made.

Unless otherwise specifically permitted, food products must not be labelled, advertised, or promoted to have any therapeutic or prophylactic actions, or to prevent, alleviate or cure any disease or condition affecting the human body. Claims on food products should also not imply that health or improved physical condition may be achieved by consuming the food, or that the claim made is interpreted as advice of a medical nature from any person.

Examples of claims that are prohibited for food are tabulated below. The list is not exhaustive and may be revised when new information is available.

<b>Examples of diseases, conditions and disorders to which no reference may be made in claims</b>
<ul style="list-style-type: none"><li>• Circulatory system of the body<ul style="list-style-type: none"><li>○ Hypertension, stroke, cholesterol disorders, reduces cholesterol, regulates platelet aggregation, coagulation defects, arteriosclerosis.</li></ul></li><li>• Eye, ear, nose<ul style="list-style-type: none"><li>○ Blindness, cataract, deafness, inflammation</li></ul></li><li>• Digestive system<ul style="list-style-type: none"><li>○ Periodontitis, ulcers, gastritis, hepatitis, liver cirrhosis, fatty liver, diarrhoea, constipation, inflammation of the intestines/liver/pancreas</li></ul></li><li>• Endocrine system<ul style="list-style-type: none"><li>○ Diabetes, thyroid disorders, hypothyroidism, prostate diseases, thymus disorders, hormonal regulation</li></ul></li><li>• Metabolic system<ul style="list-style-type: none"><li>○ Obesity, weight loss</li></ul></li><li>• Respiratory system<ul style="list-style-type: none"><li>○ Asthma, tuberculosis, bronchitis, sinusitis</li></ul></li><li>• Skin, hair, nails<ul style="list-style-type: none"><li>○ Fungal infection, eczema, ulcers, warts, moles, pigmentation disorders</li></ul></li><li>• Immune system<ul style="list-style-type: none"><li>○ Leprosy, AIDS, allergies, immunisation</li></ul></li><li>• Muscular, connective tissues and skeletal systems</li></ul>



- Osteoporosis, arthritis, sclerosis, autoimmune diseases, sclerosis, inflammation of joints
- Nervous system
  - Epilepsy, fits, paralysis, Alzheimer’s disease, Parkinsonism, dementia, neuropathies, drug addictions, depression, eating disorders
- Renal system
  - Kidney stones, renal failure, nephritis, urinary tract infection, incontinence, cystitis
- Reproductive system
  - Menstrual disorders, sexual dysfunction, manage sexual weakness or sexual excess and conditions like premature ejaculation, erectile dysfunction, infertility, frigidity, impotency, conception, pregnancy
- Others
  - Cancers, infectious diseases

**Examples of claims related to health or improved physical condition**

- Claims to suggest that the product is a traditional medicine / traditional healing / homeopathic medicine / naturopathic medicine
- Claims to suggest that the product can provide support / improve health and well being
- Claims to suggest that the food can improve immunity
- Claims to suggest that the product can help improve lactation
- Claims to suggest that the food can enhance beauty or is for anti-aging / longevity<sup>1</sup> (e.g. improve skin condition, prevent, retard, or reverse physiological changes and degenerative conditions brought about by or associated with aging.)
- Claims to suggest that the food can help prevent / reduce stress
- Claims to suggest that the food can maintain / improve performance
- Claims to suggest that the food can prevent hangover or alleviate effects after alcohol consumption
- Claims to suggest that the food can maintain / enhance intelligence or increase intelligence quotient (IQ), memory
- Claims to suggest that the food can help in height growth, breast or muscle enhancement or enlargement
- Claims to suggest that the food can help in weight loss

**Examples of claims made that may be interpreted as advice of a medical nature from any person**

- Claims to suggest that the product is recommended by doctors
- Testimonials and endorsements from healthcare professionals

**Other examples on misleading claims**

- Claims that cannot be substantiated
- Unauthorised use of HPB logo
- Claims that arouse fear in the minds of the public or exploit public's superstition
- Claims to suggest that a specific ingredient / additive that is allowed for use in food for sale in Singapore is unsafe
- Use of scientific data (e.g. graphs on health effects) that cannot be verified / validated by consumers or truncated / exaggerated to imply greater validity than what is being concluded, including claims like "clinically proven" in relation to the health effects claimed.
- Claims to suggest that the food can be used for treatment, alleviation or curing of conditions affecting the body, when not consumed orally (e.g. topical use)
- Claims to discriminate use of mainstream medications and to encourage or suggest that the food can replace mainstream medical regime

Food businesses are encouraged to refer to the guiding principles in the Singapore Code of Advertising Practice administered by the Advertising Standards Authority of Singapore, an advisory Council under CASE, on ethics in advertising.

## **Appendix IV: Guidelines on use of signs with implied claims on food labels and advertisements**

### **1. Scope**

The following guidance is intended to help industry on the interpretation of the Singapore's Sale of Food Act that no person shall sell any food which is labelled or advertised in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its value, merit or safety.

1.1 These advisory guidelines relate to the use of signs on food labels and advertisements with implied claims. These claims include:

- (a) claims on the absence, presence or addition of specific food ingredients / constituents or a blend of food ingredients / constituents
- (b) nutrition claims
- (c) health claims
- (d) multiple claims

1.2 These guidelines are not applicable to signs used on non-food products and signs without implied claims as listed in 1.1.

1.3 If it is uncertain whether a sign implies a claim, companies are advised to follow these Guidelines. Companies may also refer to these guidelines when developing signs for use on food labels and advertisements, before registering the sign as a Trademark with the relevant authority.

### **2. Definition**

2.1 "Sign" includes:

- (a) any letter, word, statement, name, numeral, brand, shape, colour, picture, mark, trademark or any of the combinations of the elements;
- (b) words in any languages, singly or with affix. For instance, "proBone" may suggest promotion of bone health;
- (c) acronyms and/or "sounds-like". For example, "e-mune" sounds similar to "immune", "ez" sounds similar to "easy"; "osteo" and "intelli" are possible acronyms for "osteoporosis" and "intelligence" respectively;
- (d) pictorial illustrations, which includes but not limited to human anatomy and medical equipment, implying the prevention, alleviation, or curing of any disease and conditions affecting the body, unless otherwise permitted by the Food Regulations; and

(e) any combination of the above.

2.2 “Multiple claims” means any representation that states, suggests or implies a combination of claims (a), (b) and (c) under paragraph 1.1 above.

### **3. Requirements for use of signs with implied claims on food labels and advertisements**

3.1 Use of signs on food labels and advertisements should meet all the criteria and the requirements as described in Figure 7.

3.2 The qualifying statement need not be repeated if the signs appear more than once on a same food label and print advertisement.

### **4. Signs that should not be used**

The following are examples of signs that should not be used:

- (a) signs stating any food will provide an adequate source of all essential nutrients;
- (b) signs implying a balanced diet, or ordinary foods cannot supply adequate amounts of all nutrients;
- (c) signs with nutrition and health claims that cannot be substantiated and are not listed as one of the permitted health claims in the Food Regulations or “A Guide to Food Labelling and Advertisements”;
- (d) signs claiming the suitability of a food for prevention, alleviation, treatment or cure of a disease, disorder, or physiological function, unless specifically permitted by the Food Regulations. Thus, signs of single word describing specific organs and disease conditions should be avoided e.g. “CardiaCure”, “ControlDiabetes”;
- (e) signs with implied claims that are used as product brand names, which could be misinterpreted as a product specific claim; and
- (f) signs that would cast doubt on the safety of other foods or imply that a food is safer than other similar food, for example “Safest choice” / “Say no to harmful {*here inserts substances allowed under for use in food in Singapore*}”.

Figure 7: Summary of the criteria and labelling requirements for use of signs with implied claims on food labels and advertisements.

Labelling Requirements / Criteria	Types of Implied Claims		
	(a) Absence, presence or addition of specific food ingredient / constituent or a blend of food ingredient / constituent  e.g. "Pre+Pro Bio"	(b) Nutrition claims  e.g. "Calci-Vita Plus Formula"	(c) Health claims  e.g. KiD Bone™
<b>(1) Declare qualifying statement on both food label and print advertisement</b>	Statement to indicate / specify the absence, presence or addition of the ingredients or the blend of ingredients  eg, "Pre+Pro Bio is an unique blend of the prebiotic inulin, and the probiotic <i>Lactobacillus acidophilus</i> ."	Statement to indicate / specify the nutrition claim  eg, "Calci-Plus Formula has calcium and vitamin D...".	Statement to indicate / specify the approved health claims, attributing to the specific ingredient(s)/nutrient(s).  eg, "KiD Bone™ contains vitamin K and vitamin D which work synergistically on bone metabolism to build strong bones."
<b>(2) Declare the ingredients / nutrients added under the statement of ingredients on food labels</b>	Declare the specific ingredients or the blend of ingredients (if added)	Declare the form of added nutrients (if added)	Declare the specific ingredient(s) or added nutrient(s) that contribute to the approved health claims

<b>(3) Declare nutrient content under the Nutrition information panel on food label</b>	-	Declare the nutrient content	Declare the content of nutrients contributing to the health claims
<b>(4) Meet the minimum nutrient / food constituent requirement</b>	-	<p>Meet the criteria stipulated under:</p> <ul style="list-style-type: none"> <li>i) Food Regulations</li> <li>ii) A Guide To Nutrition Labelling For Food Products (Singapore) – for other nutrition claims</li> </ul>	<p>Meet the criteria stipulated under:</p> <ul style="list-style-type: none"> <li>i) Food Regulations</li> <li>ii) A Guide To Nutrition Labelling For Food Products (Singapore) – for nutrient and other function claims not specified under the Food Regulations</li> </ul>

## **Appendix V: Glossary of terms**

### **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 nutrition claim or
- ii) A weighted average of an industry norm for that particular type of food or
- iii)
- iii) A food whose composition is determined by reference to published food composition tables.

The reference food must adhere to a standard of "comparability," ensuring that it closely resembles the product for which the nutrition claim is being made in terms of relevant characteristics such as ingredients, processing methods, and nutritional composition. This standard ensures a fair and accurate basis for evaluating the nutrition claim.

### **'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 partially 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.

### **Food or food constituent**

This 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.

This includes special purpose foods; foods fortified with nutrients such as protein, carbohydrate, dietary fibre, fatty acids, amino acids, vitamins and minerals: and foods added with approved herbal ingredients.

**Questions concerning the nutrition labelling requirements for food products, may be directed to:**

Level 5, Policy and Strategy Division  
*Health Promotion Board*  
*3 Second Hospital Avenue*  
*Singapore 168937*  
**Email:** [Health\\_Nutrition\\_Claims@hpb.gov.sg](mailto:Health_Nutrition_Claims@hpb.gov.sg)

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