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

**A publication of the**
**Health Promotion Board (HPB)**


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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:

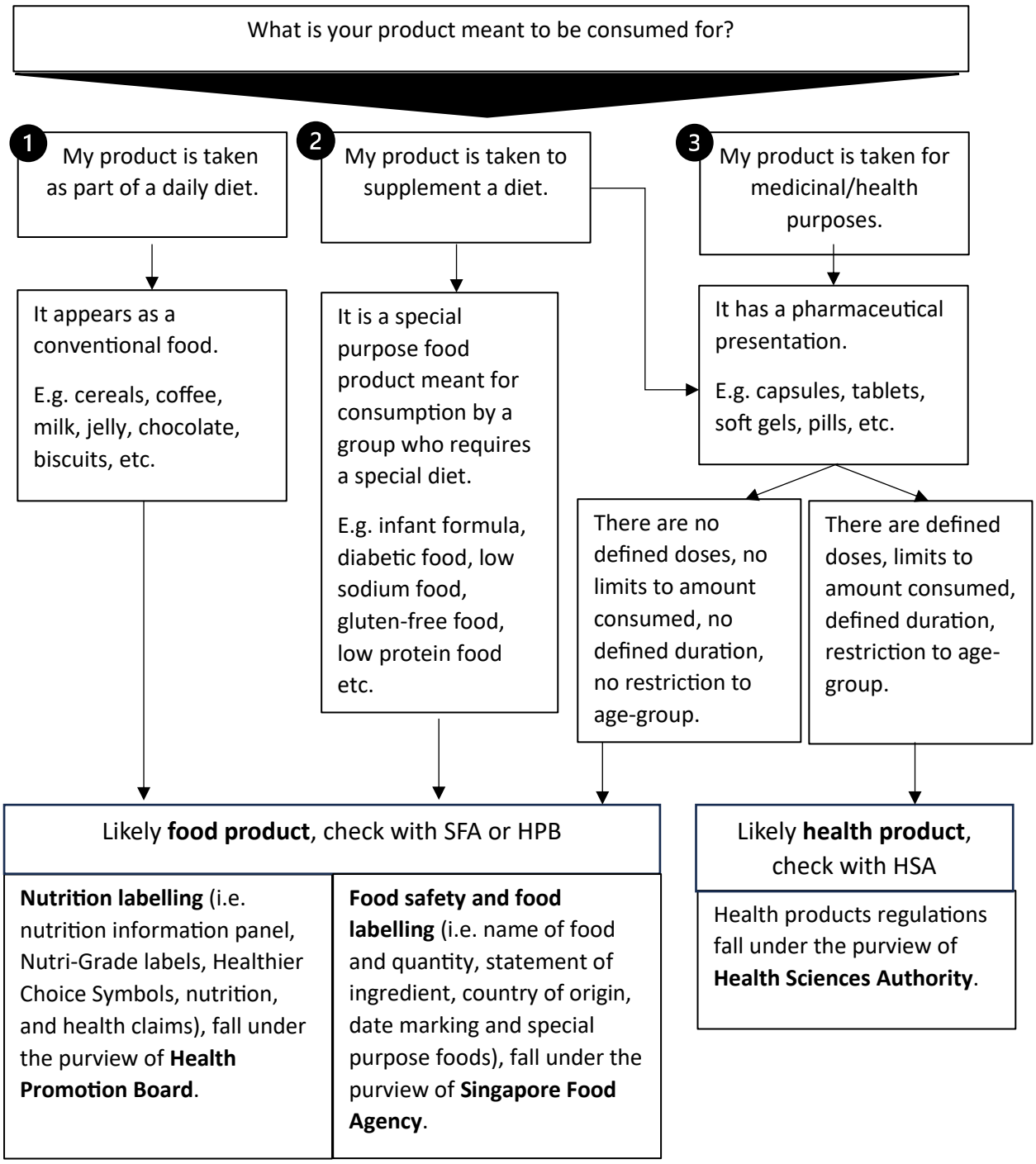
a) Singapore Food Regulations
b) Sale of Food Act

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. It 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*

| **NUTRITION INFORMATION** | | |
|---|---|---|
| Servings per package: (insert number of servings)<br>Serving size: *x* g (or ml) (insert household measurement) | | |
| | Per serving | Per 100 g (100 ml) |
| Energy | *x* kcal (*x* kJ) | *x* kcal (*x* kJ) |
| Protein | *x* g | *x* g |
| Total Fat | *x* g | *x* g |
| - Saturated Fat | *x* g | *x* g |
| - 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 |
| - Total Sugar | *x* g | *x* g |
| - Glucose | x g | x g |
| - Lactose | x g | x g |
| - Galactose | x g | x g |
| Dietary Fibre | *x* g | *x* g |
| - Resistant Starch | *x g* | *x g* |
| Sodium | *x* mg | *x* mg |
| Magnesium | *x* mg | *x* mg |
| Vitamin D | *x* mg | *x* mg |
| Phytosterols | *x* g | *x* g |

*> Panel Heading*

*> Serving Size*

*> Nutrient Listing*

Polyunsaturated fat and monounsaturated fat may be inserted after saturated fat.

Omega fatty acids may be inserted after polyunsaturated/ monosaturated fat.

Glucose, Lactose, and Galactose may be inserted under Total Sugar

Resistant starch can be listed under dietary fibre.

Other nutrients claimed can be added after the core list.

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*

| **Stated Nutrient Content** | **Naturally occurring nutrients** | **Added vitamins, minerals, and protein*** | **Energy, fat, cholesterol, carbohydrate, sodium, saturated fat and trans-fat, dietary fibre **** |
|---|---|---|---|
| **Actual Nutrient Criteria** | ≥ 80% of what is stated in the panel | ≥ 100% of what is stated in the panel | ≤ 120% of what is stated in the panel |

* Includes other added nutrients e.g. amino acids, nucleotides, etc.
** Trans fat is no longer a core nutrient for the Nutrition Information Panel.

## 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. | **Product Definition**: Product falls within the working definition of food. | | |
| 2. | **Approved claim**: Health or nutrition claim is within the list of approved claims. | | |
| 3 | **Criteria fulfilled:** Product meets the stated criteria for the health or nutrition claim stated in this guideline. | | |
| 4. | **Labelled with NIP:** The nutrient of concern for which a claim is made must be supported by a NIP. | | |
| 5. | **Misleading:** The claim is not false, misleading, or prohibited by the Food Regulations on the product and any materials that inform its sale. | | |
| 6. | **Supporting documents:** 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 |
|---|---|---|
| **Energy** | | |
| 1 | Energy Free | Please refer to **Appendix I: Energy** 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 |
|---|---|---|
| **Protein** | | |
| 22 | Source of Protein | Please refer to **Appendix I: Protein** 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 | |
| **Carbohydrate** | | |
| 31 | Source of Carbohydrate | Please refer to **Appendix I: Carbohydrate** 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 | |
| **Sugar** | | |
| 38 | No Added Sugar | Please refer to **Appendix I: Carbohydrate** 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 | |
| **Glycemic Index** | | |
| 52 | Low Glycemic Index | |
| **Fibre** | | |
| 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 **Appendix I: Fiber and wholegrain** 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 | |
| **Wholegrain** | | |
| 60 | Higher in Wholegrains | |
| **Fat** | | |
| 61 | Fat Free | Please refer to **Appendix I: Fats and cholesterol** 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 | |
| **Fatty Acid** | | |
| 76 | Saturated Fat Free | Please refer to **Appendix I: Fats and cholesterol** 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 **Appendix I: Fats and cholesterol** 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 | |
| **Cholesterol** | | |
| 98 | Cholesterol Free | Please refer to **Appendix I: Fats and cholesterol** 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 |
|---|---|---|
| **Sodium** | | |
| 109 | No Added Salt | Please refer **Appendix I: Sodium** 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 **Appendix I: Sodium** 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 | |
| **Vitamin and Mineral** | | |
| 129 | Source/Contain/added with/with/presence of a vitamin / mineral | Please refer to **Appendix I: Vitamin and mineral** 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 |
|---|---|---|
| **Nutrient Function Claim** | | |
| **Macronutrient** | | Please refer to **Appendix II: Nutrient-function claim** for detailed criteria and further information. |
| 1 | Protein provides the essential amino acids needed to aid in the building and maintenance of body tissues. | |
| 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 | |
| **Vitamins** | | |
| 6 | Vitamin A is essential for the functioning of the eye | Please refer to **Appendix II: Nutrient-function claim** 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 **Appendix II: Nutrient-function claim** 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 B3contributes 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 **Appendix II: Nutrient-function claim** 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 | |
| **Minerals** | | |
| 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 **Appendix II: Nutrient-function claim** 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 haemoglobulin, the protein in red blood cells that carries oxygen to tissues | |
| 84 | Iron is needed to produce myoglobulin, 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 | |

| S/N | List of Approved Health Claim | Guide Page Reference |
|---|---|---|
| 111 | Zinc is necessary for normal immune system function | Please refer to **Appendix II: Nutrient-function claim** 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 |
|---|---|---|
| **Other Function Claims** | | |
| **Other Nutrients/Food Constituent** | | |
| 125 | Chromium contributes to normal macronutrient metabolism | Please refer to **Appendix II: Other function claims** 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 |
|---|---|---|
| **Reduction of Disease Claims** | | |
| 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 **Appendix II: Reduction of disease risk claims** 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)*

| | | |
|---|---|---|
| 1. *Essential amino acids in natural L-forms:*<br>• Leucine<br>• Lysine<br>• Methionine<br>• Phenylalanine<br>• Threonine<br>• Tryptophan<br>• Valine | 2. *Nucleotides:*<br>• Cytidine 5'-Monophosphate<br>• Uridine 5'-Monophosphate<br>• Adenosine 5 – Monophosphate<br>• Guanosine 5'-Monophosphate<br>• Inosine 5'-Monophosphate | 3. Long chain polyunsaturated fatty acids [including docosahexaenoic acid (DHA) and Arachidonic acid (AA)]<br>4. Galacto-oligosaccharides<br>5. Polydextrose, Long chain inulin, Oligofructose produced from inulin<br>6. Bovine lactoferrin<br>7. Beta-palmitin<br>8. 2'-fucosyllactose<br>9. Lacto-N-neotetraose<br>10. 2'-fucosyllactose/difucosyllactose mixture<br>11. Lacto-N-tetraose<br>12. Sodium salt of 3'-sialyllactose<br>13. Sodium salt of 6'-sialyllactose<br>16. 3-fucosyllactose Nucleotides: |

- 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

| | |
|---|---|
| **Definition** | • Food energy is defined as the energy released from carbohydrates, fats, proteins, and other organic compounds. |
| **Notes on High in Energy and High Energy claim** | • The claim "High in Energy" and "High Energy" can only be used with 'formulated supplementary sports food' and 'meal replacement'.<br>• *'Formulated supplementary sports food'* is defined as *a* food or mixture of foods formulated to help sports people achieve specific nutritional goals, such as, regaining strength.<br>• *'Meal replacement'* 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 |
| **Notes on Source of Energy, High Energy and High in Energy claim** | • The recommended quantity of food to be consumed per day must provide ≥ 300 kilocalories.<br>• 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." |
| **Notes on reference food and meal type product** | • Please refer to the glossary section for the detailed definition of the terms. |

| **Nutrient** | **Claims** | **Criteria** |
|---|---|---|
| **Energy** | 1. Energy Free<br>2. Calorie Free | • ≤1 kilocalorie per 100 g / 100 ml, or<br>• ≤5 kilocalorie per serving |
| | 1. Source of Energy | • ≥ 100 kilocalorie per serving |

| | | |
|---|---|---|
| | 1. High in Energy<br>2. High Energy | • ≥ 300 kilocalorie per 100 g, or<br>• ≥ 80 kilocalorie per 100 ml |
| | 1. Low Energy<br>2. Low Calorie<br>3. Lite in Energy<br>4. Light in Energy<br>5. Light in Calorie | • ≤ 8 kilocalorie per 100 ml for beverages (ready for consumption), or<br>• ≤ 100kcal per 100g for bread spreads including jam substitutes<br>• Or ≤ 50kcal per 100g for other foods. |
| | 1. Light Dinner<br>2. Lite Dinner<br>3. Light Meal<br>4. Lite Meal | <u>Meal Type Product</u><br>• ≤ 120 kilocalorie per 100 g, or<br>• ≤ 300 kilocalorie per serving |
| | 1. Less Energy<br>2. Less Calorie<br>3. Lower in Calorie<br>4. Reduced Energy<br>5. Calorie Reduced | • ≥ 25% less energy than the reference food |
| | 1. More / Increased / Fortified / Enriched / Added Energy | • ≥ 25% more energy than the reference food |

## Appendix I: Protein

| | |
|---|---|
| **Definition** | Proteins are large molecules made up of amino acids. |
| **Notes on Good Source of Protein, High in Protein, Rich in Protein, Excellent Source of Protein** | • The quantity of that food to be consumed in one day, and an acceptable NIP should be included on the label.<br>• Examples of the daily recommendation statement are "Recommended daily intake: 3 servings"; "Add 20g powder in 200ml water. Drink 2 times daily." |
| **Notes on reference food** | • Please refer to the glossary section for the detailed definition of the terms. |

| **Nutrient** | **Claim** | **Criteria** |
|---|---|---|
| **Protein** | 1. Source of Protein<br>2. Contains Protein | • The recommended quantity of food to be consumed per day must provide ≥ 10g protein<br>• To claim for a source of protein, the protein content of the food must contribute to at least 12% of calorie yield |
| | 1. Good Source of Protein<br>2. High in Protein<br>3. Rich in Protein<br>4. Excellent Source of Protein | • The recommended quantity of food to be consumed per day must provide ≥ 10g protein<br>• To claim for a good source of protein, the protein content of the food must contribute to at least 20% of calorie yield |
| | 1. Low Protein | • <5% kilocalories from protein |
| | 1. Reduced Protein | • ≥25% less protein than the reference food |

| | | |
|---|---|---|
| | 1. More / Increased / Fortified/ Enriched / Added Protein | • ≥25% more protein than the reference food |

## Appendix I: Carbohydrate

| | |
|---|---|
| **Definition** | • Carbohydrate:<br>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:<br>- Sugars such as monosaccharides (e.g. glucose) and disaccharides (e.g. sucrose);<br>- Sugar alcohols (e.g. isomalt, lactitol, maltitol, maltitol syrup, mannitol, sorbitol and xylitol);<br>- Starch<br>• Sugar:<br>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.<br>• Sweetening substances:<br>Nonnutritive or artificial sweeteners such as saccharin, aspartame, acesulfameK and sucralose and steviol glycosides. |
| **Notes on Glycemic Index claim** | • The cut-off values for the classification of low, medium, and high GI are standardised internationally (ISO 26642:2010). |
| **Notes on reference food and meal type product** | • Please refer to the glossary section for the detailed definition of the terms. |

| **Nutrient** | **Claim** | **Criteria** |
|---|---|---|
| Carbohydrate | 1. Source of Carbohydrate<br>2. Contains Carbohydrate | • > 10 g carbohydrate per 100 g |
| | 1. Low in Carbohydrate<br>2. Low Carbohydrate | • ≤ 10 g carbohydrate per 100 g, or<br>• ≤ 2 g carbohydrate per serving |

| Nutrient | Claim | Criteria |
|---|---|---|
| | 1. Reduced Carbohydrate<br>2. Carbohydrate-Reduced | • ≥ 25% less carbohydrate than the reference food |
| | 1. More / Increased / Fortified / Enriched / Added Carbohydrate | • ≥ 25% more carbohydrate than the reference food |
| | 1. Low Glycemic Index | • Must have a GI value of 55 and below. |
| Sugar | 1. No Added Sugar<br>2. Without Added Sugar | • 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. |
| | 1. Unsweetened | • 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. |
| | 1. Sugar Free<br>2. Free of Sugar<br>3. Lactose Free | • ≤ 0.5 g sugars per 100 g or 100 ml<br><br><u>Meal Type Product</u><br>• ≤ 0.5 g sugars per serving |
| | 1. Low Sugar<br>2. Low in Sugar<br>3. Lite in Sugar<br>4. Light in Sugar | • ≤ 5 g sugars per 100 g, or<br>• ≤ 2.5 g sugars per 100 ml, or<br>• ≤ 2 g sugars per serving |

| Nutrient | Claim | Criteria |
|---|---|---|
| | 1. Less Sugar<br>2. Lower Sugar<br>3. Lower in Sugar than …<br>4. Reduced Sugar | • ≥ 25% less sugar than the reference food |

## Appendix I: Fiber and wholegrain

| | |
|---|---|
| **Definition** | • Dietary fibre:<br>Dietary fibre means carbohydrate polymers with ten or more monomeric units and nondigestible.<br><br>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:<br>- Edible carbohydrate polymers naturally occurring in the food as consumed.<br>- 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.<br>- 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.<br>• Wholegrain:<br>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.<br><br>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. |
| **Notes on wholegrain claim** | In addition, under regulation 40A of the Food Regulations, the following must be met:<br><br>• food product falls within or is made from ingredients falling within the definition of "wholegrain"; and<br><br>• the word "wholegrain" (or other words conveying that meaning) is qualified immediately by words indicating the percentage of wholegrain ingredients used. |

| | |
|---|---|
| **Notes on reference food** | Please refer to the glossary section for the detailed definition of the terms. |

| **Nutrient** | **Claim** | **Criteria** |
|---|---|---|
| Fiber | 1. Source of Dietary Fibre<br>2. Contains Dietary Fibre | • ≥ 1.5 g per 100 kcal, or<br>• ≥ 3 g per 100 g, or<br>• ≥ 3 g per 100 ml |
| | 1. High in Dietary Fibre<br>2. High Source of Dietary Fibre<br>3. Good Source of Dietary Fibre<br>4. Fibre-Rich | • ≥ 4 g per serving, or<br>• ≥ 3 g per 100 kcal, or<br>• ≥ 6 g per 100 g, or<br>• ≥ 6 g per 100 ml |
| | 1. More / Increased / Fortified / Enriched / Added Dietary Fibre | • ≥ 25% more dietary fibre than the reference food |
| Wholegrain | 1. Higher in Wholegrains | • ≥ 10% wholegrains |

## Appendix I: Fats and cholesterol

| | |
|---|---|
| **Definition** | • Total Fat:<br>Total fat should include saturated fat, trans fat, monounsaturated and polyunsaturated fats.<br>• Fatty Acids:<br>- *Monounsaturated fatty acids* - Fatty acids that contain one double bond between carbon atoms, e.g. palmitoleic acid and oleic acid.<br>- *Polyunsaturated fatty acids* - Fatty acids that contain two or more double bonds between carbon atoms, e.g. linoleic acid and linolenic acid.<br>• Cholesterol*:*<br>Dietary cholesterol is a waxy, fat-like structure that is consumed from food |
| **Notes on fat free claim** | 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. |
| **Notes on cholesterol-free claim** | Claims stating or implying that a product is of certain percent cholesterol-free (e.g. 20% cholesterol free) are considered misleading. |
| **Notes on Low Cholesterol, Light in Cholesterol, Low in Cholesterol, Lite in Cholesterol** | *Trans* fatty acids must be counted (or calculated) as saturated fatty acids for this claim. |
| **Notes on reference food and meal type product** | Please refer to the glossary section for the detailed definition of the terms. |

| **Nutrient** | **Claim** | **Criteria** |
|---|---|---|
| Total Fat | 1. Fat Free<br>2. Contains No Fat<br>3. Free of Fat | • ≤ 0.15 g fat per 100 g or 100 ml of food<br><br><u>Meal Type Product</u><br>• ≤ 0.5 g of fat per serving |

| Nutrient | Claim | Criteria |
|---|---|---|
| | 1. Low Fat<br>2. Low in Fat<br>3. Light in Fat<br>4. Lite in Fat | • ≤ 3 g fat per 100 g, or<br>• ≤ 1.5 g fat per 100 ml |
| | 1. Reduced Fat<br>2. Lower Fat<br>3. Reduced in Fat<br>4. Lower in Fat<br>5. Less Fat than...<br>6. A certain % less | • ≥ 25% less fat than the reference food |
| | 1. Lean Meat | • < 10 g total fat<br>< 4 g saturated fat, and<br>< 95 mg cholesterol per 100 g of food |
| | 1. Extra Lean Meat | • < 5 g total fat,<br>< 2 g saturated fat, and<br>< 95 mg cholesterol per 100 g of food |
| Fatty Acids | 1. Saturated Fat Free<br>2. Free of Saturated Fat | • ≤ 0.5 g of saturated fatty acids per 100 g, and ≤1% of the total fat is trans fatty acids |
| | 1. Low Saturated Fat<br>2. Low in Saturated Fat | • ≤ 1.5 g saturated fats per 100 g, and ≤10% of kilocalories from saturated fats, or<br>• ≤ 0.75 g of saturated fats per 100 ml, and ≤ 10% of kilocalories from saturated fats<br><br>Trans fatty acids should be counted as saturated fatty acids for this claim |

| Nutrient | Claim | Criteria |
|---|---|---|
| | 1. A certain % less<br>2. Reduced in Saturated Fat<br>Lower in Saturated Fat<br>Reduced Saturated Fat | • ≥ 25% less saturated fat than the reference food<br><br>Trans fatty acids should be counted as saturated fatty acids for this claim |
| | 1. Contains Polyunsaturated Fats<br>2. Source of Polyunsaturates<br>3. (or Polyunsaturated Fatty Acids or Polyunsaturates)<br>4. Presence of Polyunsaturates | • > 40% total fat shall be polyunsaturated fatty acids, < 20% total fat shall be saturated fatty acids and > 25% kilocalories shall be derived from fat |
| | 1. High in Polyunsaturated Fats (or Polyunsaturated Fatty Acids or Polyunsaturates) | • >40% total fat shall be polyunsaturated fatty acids, < 20% total fat shall be saturated fatty acids and > 50% kilocalories shall be derived from fat |
| | 1. Increased Polyunsaturated Fats<br><br>2. More Polyunsaturated Fats | • ≥ 25% more polyunsaturated fatty acids than the reference food |
| | 1. Contains Monounsaturated Fats<br>2. Source of Monounsaturates (or Monounsaturated Fatty Acids or Monounsaturates)<br><br>3. Presence of Monounsaturates | • > 40% total fat shall be monounsaturated fatty acids, < 20% total fat shall be saturated fatty acids and > 25% kilocalories shall be derived from fat |
| | 1. High in Monounsaturated Fats (or Monounsaturated Fatty Acids or Monounsaturates) | • > 40% total fat shall be monounsaturated fatty acids, < 20% total fat shall be saturated fatty acids and > 50% kilocalories shall be derived from fat |
| | 1. Increased Monounsaturated Fats<br>2. More Monounsaturated Fats | • ≥ 25% more monounsaturated fatty acids compared with reference food |

| Nutrient | Claim | Criteria |
|---|---|---|
| | 1. Trans Fat Free<br>2. Free of Trans Fat | • < 0.5 g of trans fatty acids per 100 g |
| | 1. No Added Trans Fat<br>2. Without Added Trans Fat | • No trans-fat or ingredients with trans fat (whether naturally-occurring or added), are added during processing. |
| Cholesterol | 1. Cholesterol Free<br>2. No Cholesterol<br>3. Free of Cholesterol | <u>Food that are derived solely from plant source.</u><br>• 0 mg of cholesterol per 100 g food<br><br><u>Other food products</u><br>• < 5 mg of cholesterol per 100 g food, and meets the conditions for a 'low saturated fatty acids' food |
| | 1. Low Cholesterol<br>2. Light in Cholesterol<br>3. Low in Cholesterol<br>4. Lite in Cholesterol | • ≤ 20 mg of cholesterol per 100 g, and<br>≤ 1.5 g of saturated fats per 100 g food, and<br>≤ 10% of kilocalories from saturated fats, or<br>• ≤ 10 mg of cholesterol per 100 ml and<br>≤ 0.75 g of saturated fats per 100 ml, and<br>≤ 10% of kilocalories from saturated fats |
| | 1. A certain % less<br>2. Reduced in Cholesterol<br>3. Lower in Cholesterol<br>4. Reduced Cholesterol | • ≥ 25% less cholesterol than the reference food |

## Appendix I: Sodium

| | |
|---|---|
| **Definition** | • Salt is defined as a mineral substance primarily composed of sodium chloride (NaCl). |
| **Notes on salt/sodium free claim** | Claims stating or implying that a product is of a certain percent sodium/salt free (e.g. 20% sodium / salt free) are considered misleading. |
| **Notes on reference food** | Please refer to the glossary section for the detailed definition of the terms. |

| **Nutrient** | **Claim** | **Criteria** |
|---|---|---|
| Sodium | 1. No Added Salt<br>2. No Salt Added<br>3. Unsalted | • No sodium chloride, sodium compounds, or any ingredient containing added sodium chloride or other sodium compounds, should be added to the food |
| | 1. Salt Free<br>2. Sodium Free | • ≤ 5 mg sodium per 100 g |
| | 1. Low in Salt<br>2. Low Sodium<br>3. Light in Salt<br>4. Low Salt<br>5. Light in Sodium<br>6. Lite in Salt<br>7. Low in Sodium<br>8. Lite in Sodium<br>9. Lightly Salted | • ≤ 120 mg sodium per 100 g |
| | 1. Very Low in Salt<br>2. Very Low in Sodium | • ≤ 40 mg sodium per 100 g |

| Nutrient | Claim | Criteria |
|---|---|---|
| | 1. A certain % less<br>2. Reduced Salt<br>3. Lower in Salt<br>4. Lower in Sodium | • ≥ 25% less sodium compared to reference food |

## Appendix I: Vitamin and mineral

| | |
|---|---|
| **Definition** | • Vitamin:<br>Organic nutrient that the body needs in small amounts to function and stay healthy. For example, Vitamin C.<br>• Minerals:<br>Inorganic nutrients that are necessary for various body functions. For example, calcium. |
| **Notes on Vitamin A, Vitamin D and mineral** | • 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.<br>• When vitamin D is added to food the addition must not increase the content of vitamin D to more than 10 mcg of cholecalciferol<br>• 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.<br><br>*(The information provided in the vitamins/minerals section was adapted from the Sale of Food Act, Cap. 283, Food Regulations, Regulation 11).* |
| **Notes on reference quantity and daily allowance** | • Please refer to Figure 5 for the specific vitamin and mineral daily allowance.<br>• Please refer to Figure 6 for the reference quantity of the food |
| **Notes on vitamins and minerals not listed in Figure 5** | • 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. |

| Nutrient | Claim | Criteria |
|---|---|---|
| Vitamin/Mineral | 1. Source/Contain/added with/with/presence of a vitamin / mineral | • Reference quantity should contain at least 1/6 of the daily allowance |
| | 1. Excellent source/Enriched/ Fortified/Ennobled/ Vitaminised/High/Good/Rich of a vitamin/mineral | • Reference quantity should contain at least 50% of the daily allowance |

*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*

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

| | |
|---|---|
| **Notes on usage** | • The amount of the claimed nutrient must be declared in the nutrition information panel. |
| **Notes on reference quantity and daily allowance** | • Please refer to Figure 5 for the specific vitamin and mineral daily allowance.<br>• Please refer to Figure 6 for the reference quantity of the food |

| **Macronutrients** | | |
|---|---|---|
| **Nutrient** | **Claim** | **Criteria** |
| Protein | 1. Protein provides the essential amino acids needed to aid in the building and maintenance of body tissues. | • At least 12% by weight of calorie yield of food is derived from protein<br>• The amount of food to be consumed per day contains at least 10g of protein<br>• The quantity of food to be consumed per day must be declared |
| | 2. Protein helps in tissue building and growth | |
| Lactose | 1. Low lactose content allows easier digestion | • ≤ 5g lactose in per 100g of solid food; or ≤ 2.5g lactose in per 100ml of liquid food |
| | 2. Low lactose content eases digestion for people who are lactose intolerant | |
| Dietary Fibre | 1. Dietary fibre aids in digestive system | • ≥ 3g per 100g of solid food or 100ml of liquid food |

| **Micronutrients: Vitamin** | | |
|---|---|---|
| **Nutrient** | **Claim** | **Criteria** |
| Vitamin A (calculated as retinol activity) | 1. Vitamin A is essential for the functioning of the eye | • ≥ 125mcg of vitamin A in per reference quantity of the food |

| Micronutrients: Vitamin | | |
|---|---|---|
| **Nutrient** | **Claim** | **Criteria** |
| | 2. Vitamin A helps to maintain normal skin and mucous membrane. | as specified in Figure 6: Reference Quantity. |
| | 3. Vitamin A contributes to the normal function of the immune system | |
| Vitamin B1 (thiamin) | 1. Vitamin B1 helps to release energy from proteins, fats and carbohydrates | • ≥ 0.167mg of thiamin in per reference quantity of the food as specified in Figure 6: Reference Quantity. |
| | 2. Vitamin B1 contributes to normal functioning of the nervous system | |
| | 3. Vitamin B1 contributes to the normal functioning of the heart | |
| Vitamin B2 (riboflavin) | 1. Vitamin B2 helps to release energy from proteins, fats and carbohydrates | • ≥ 0.25mg of riboflavin in per reference quantity of the food as specified in Figure 6: Reference Quantity. |
| | 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 | |
| Vitamin B3 (niacin) | 1. Vitamin B3 helps to release energy from proteins, fats and carbohydrates | • ≥ 2.67mg of niacin in per reference quantity of the food |

| Micronutrients: Vitamin | | |
|---|---|---|
| **Nutrient** | **Claim** | **Criteria** |
| | 2. Vitamin B3contributes to the reduction of tiredness and fatigue | as specified in Figure 6: Reference Quantity. |
| | 3. Vitamin B3 contributes to the maintenance of normal skin | |
| | 4. Vitamin B3 contributes to normal functioning of the nervous system | |
| Vitamin B5 (Pantothenic acid) | 1. Pantothenic acid contributes to normal energy productions | • ≥ 0.75mg of pantothenic acid in per 100g of food, or ≥ 0.38mg pantothenic in per 100ml of food |
| | 2. Pantothenic acid contributes to the reduction of tiredness and fatigue | |
| | 3. Pantothenic acid contributes to normal mental performance | |
| Vitamin B6 (pyridoxine) | 1. Vitamin B6 is important for the production of energy | • ≥ 0.33mg of pyridoxine in per reference quantity of the food as specified in Figure 6: Reference Quantity. |
| | 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 | |

| Micronutrients: Vitamin | | |
|---|---|---|
| **Nutrient** | **Claim** | **Criteria** |
| Vitamin B12 (cyanocobalamin) | 1. Vitamin B12 is necessary for fat, carbohydrate and protein metabolism | • ≥ 0.33mcg of cyanocobalamin in per reference quantity of the food as specified in Figure 6: Reference Quantity. |
| | 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 | • ≥ 33.33mcg of folic acid in per reference quantity of the food as specified in Figure 6: Reference Quantity. |
| | 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 | • ≥ 5mg of vitamin C in per reference quantity of the food as specified in Figure 6: Reference Quantity |
| | 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 | • ≥ 0.42mcg of vitamin D in per reference quantity of the food as specified in Figure 6: Reference Quantity |
| | 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 | • ≥ 1.67mg of vitamin E in per reference quantity of the food as specified in Figure 6: Reference Quantity |
| | 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 | • ≥ 9mcg of vitamin K in per 100g of food, or ≥ 4.5mcg vitamin K in per 100ml of food |
| Biotin | 1. Biotin contributes to normal energy-yielding metabolism | • ≥ 4.5mcg of biotin in per 100g of food, or ≥ 2.25mcg biotin in per 100ml of food |
| | 2. Biotin contributes to normal macronutrient metabolism | |

| Micronutrients: Vitamin | | |
|---|---|---|
| **Nutrient** | **Claim** | **Criteria** |
| | 3. Biotin contributes to the maintenance of normal hair | |
| Choline | 1. Choline contributes to normal lipid metabolism | • ≥ 82.5mg of choline in per 100g or 100ml or per single serving of food |
| | 2. Choline contributes to the maintenance of normal liver function | |
| Choline - *claims only for food for children up to 6 years of age* | 3. Choline helps support overall mental functioning for children up to 6 years of age | • Food must be labelled clearly for this age group |
| **Combined vitamin claims** | | |
| Vitamin K and D | 1. Vitamins K and D work synergistically on bone metabolism to improve bone strength/build strong bones | • ≥ 0.42mcg of vitamin D in per reference quantity of the food as specified in Figure 6: Reference Quantity<br>• ≥ 9mcg of vitamin K in per 100g of food, or ≥ 4.5mcg vitamin K in per 100ml of food |

| Micronutrients: Minerals | | |
|---|---|---|
| **Nutrient** | **Claim** | **Criteria** |
| Calcium | 1. Calcium helps build/to support development of strong bones and teeth. | • ≥ 133.33mg of calcium in per reference quantity of the food as specified in Figure 6: Reference Quantity |
| | 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. | • ≥ 16.67mcg of iodine in per reference quantity of the food |

| Micronutrients: Minerals | | |
|---|---|---|
| **Nutrient** | **Claim** | **Criteria** |
| | 2. Iodine is necessary for normal energy metabolism. | as specified in Figure 6: Reference Quantity |
| | 3. Iodine contributes to normal cognitive function. | |
| | 4. Iodine contributes to the maintenance of normal skin. | |
| 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 | • ≥ 1.67mg of iron in per reference quantity of the food as specified in Figure 6: Reference Quantity |
| | 2. Iron is needed to produce haemoglobulin, the protein in red blood cells that carries oxygen to tissues | |
| | 3. Iron is needed to produce myoglobulin, 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 | |
| Iron - *claims only for food for children up to 6 years of age* | 9. Iron support the child's natural defenses for children up to 6 years of age | • Food must be labelled clearly for this age group |
| Phosphorus | 1. Phosphorus contributes to bone development | • ≥ 133.33mg of phosphorus in per reference quantity of the |

| Micronutrients: Minerals | | |
|---|---|---|
| **Nutrient** | **Claim** | **Criteria** |
| | 2. Phosphorus contributes to normal energy metabolism | food as specified in Figure 6: Reference Quantity |
| | 3. Phosphorus contributes to the maintenance of normal teeth | |
| Magnesium | 1. Magnesium helps in the absorption and retention of calcium | • ≥ 46.5mg of magnesium in per 100g of solid food, or ≥ 23.25mg of magnesium in per 100ml of liquid food |
| | 2. Magnesium contributes to energy metabolism and the maintenance of bone and teeth | |
| | 3. Magnesium is necessary for normal nerve and muscle function | |
| | 4. Magnesium is necessary for normal electrolyte balance | |
| | 5. Magnesium contributes to a reduction of tiredness and fatigue | |
| Zinc | 1. Zinc is essential for growth | • ≥ 1.65mg of zinc in per 100g of solid food, or ≥ 0.83mg of zinc in per 100ml of liquid food |
| | 2. Zinc contributes to normal metabolism of fatty acids | |
| | 3. Zinc contributes to the maintenance of normal bones | |
| | 4. Zinc contributes to the maintenance of normal hair | |
| | 5. Zinc contributes to the maintenance of normal nails | |
| | 6. Zinc contributes to the maintenance of normal vision | |
| | 7. Zinc contributes to normal cognitive function | |
| | 8. Zinc contributes to the normal macronutrient metabolism | |

| 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 - *claims only for food for children up to 6 years of age* | 14. Zinc helps in physical development for children up to 6 years of age | • Food must be labelled clearly for this age group |
| | 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 | • ≥ 9mcg of selenium in per 100g of food, or ≥ 4.5mcg selenium in per 100ml of food |
| | 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 | • ≥ 525mg of potassium in per 100g of food, or ≥ 263mg potassium in per 100ml of food |
| | 2. Potassium contributes to normal functioning of the nervous system | |

| Micronutrients: Minerals | | |
|---|---|---|
| **Nutrient** | **Claim** | **Criteria** |
| Copper | 1. Copper contributes to normal energy production | • ≥ 135mcg of copper in per 100g of food, or ≥ 67.5mcg copper in per 100ml of food |
| | 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 | • ≥ 6mcg in per 100g or 100ml of food<br>• The amount of chromium must be declared under the nutrition information panel. |
| Collagen | 1. Collagen is a protein in connective tissues found in skin, bones and muscles | • The addition of collagen has to be disclosed under the statement of ingredients. |
| Docosahexaenoic acid (DHA) and Arachidonic acid (ARA) – *claim only for food for children up to 3 years of age* | 1. DHA and ARA are important building blocks for development of the brain and eyes for children up to 3 years of age. | • Food must be labelled clearly for this age group.<br>• The amounts of DHA and ARA must be declared under the nutrition information panel. |
| Nucleotides - *claim only for food for children up to 6 years of age* | 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 | • Food must be labelled clearly for this age group.<br>• The amounts of nucleotides must be declared under the nutrition information panel. |
| Taurine - *claim only for food for children up to 6 years of age* | 1. Taurine helps to support overall mental and physical development for children up to 6 years of age | • Food must be labelled clearly for this age group.<br>• The amount of taurine must be declared under the nutrition information panel. |
| Inulin | 1. Inulin helps in calcium absorption | • ≥ 133.33mg of calcium in per reference quantity of the food as specified in Figure 6: Reference Quantity<br>• The amount of calcium must be declared under the nutrition information panel.<br>• The amount of inulin present in each serving or other equivalents of the product |

| Nutrients / Food constituents | Claims | Criteria |
|---|---|---|
| | | must be declared on the product label.<br>• 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. |
| | 2. Inulin helps support growth or beneficial bacteria/good intestinal flora in gut | • Food manufacturer/importer to ensure that the amount of inulin present in the product can bring about the claimed effect. |
| | 3. Inulin helps increase intestinal bifidobacteria and helps maintain a good intestinal environment | |
| Oligofructose (Fructo-oligosaccharides) | 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 | • Food manufacturer/importer to ensure that the amount of the oligofructose present in the product can bring about the claimed effect. |
| Prebiotics | 1. Prebiotic promotes the growth of good *Bifidus* bacteria to help maintain a healthy digestive system | • The exact identity of the prebiotic must be declared on the product label.<br>• Food manufacturer/importer to ensure that the amount of prebiotic present in the product can bring about the claimed effect. |
| Prebiotic blend of Galacto-oligosaccharides and long chain Fructo-oligosaccharide | 1. Prebiotic blend (galacto-oligosaccharides and long chain fructo-oligosaccharides) support the child's natural defenses for children up to 6 years of age | • The combination of galacto-oligosaccharides and long chain Fructo-oligosaccharide present in the product must be in ratio of 9:1 |

| Nutrients / Food constituents | Claims | Criteria |
|---|---|---|
| Probiotics | 1. Probiotics to help maintain a healthy digestive system<br>2. Probiotics helps in digestion<br>3. Probiotics helps to maintain a desirable balance of beneficial bacterial in the digestive system<br>4. Probiotics helps to suppress/fight against harmful bacteria in the digestive system, thereby helping to maintain a healthy digestive system | • The exact species of the probiotic present in the product must be declared on the product label<br>• Food manufacturer/importer to ensure that the viable count of the probiotic present in the product can bring about the claimed effect. |
| Plant sterols/stanols | 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 | • Phytosterols, phytosterol esters, phytostanols or phytostanol esters may only be added to —<br>a. any edible vegetable fat or oil containing not more than 20 g of saturated fat per 100 g of total fat;<br>b. any margarine or fat spread containing not more than 27 g of saturated fat per 100 g of total fat; or<br>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.<br>• The following mandatory information must be declared on the product label:<br>a. The product is a special purpose food intended for people who want to lower their blood cholesterol level;<br>b. The product may not be nutritionally appropriate for pregnant and breast- |

| Nutrients / Food constituents | Claims | Criteria |
|---|---|---|
| | | feeding women and children under the age of 5 years;<br>c. The product should be used as part of a balanced and varied diet;<br>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;<br>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<br>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. |
| 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. | • The cholesterol, saturated fatty acids and trans fatty acids present in the food must be within the following levels:<br>(i) in the case of solid food —<br>a. not more than 20 mg of cholesterol per 100 g;<br>b. not more than 1.5 g of saturated fatty acids and<br>c. trans fatty acids per 100 g; and |

| Nutrients / Food constituents | Claims | Criteria |
|---|---|---|
| | | d. not more than 10% of kilocalories from<br>e. saturated fatty acids and trans fatty acids; or<br>(ii) in the case of liquid food —<br>a. not more than 10 mg of cholesterol per 100 ml;<br>b. not more than 0.75 g of saturated fatty acids and<br>c. trans fatty acids per 100 ml; and<br>d. not more than 10% of kilocalories from<br>e. saturated fatty acids and trans fatty acids.<br>• The following mandatory information must be declared on the product label:<br>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<br>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. |

## 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. | • At least 50% of calcium RDA, which is taken as 800mg and<br>• Low in fat (≤3g fat per 100g or ≤1.5g fat per 100ml) or Fat free (≤0.15g fat per 100g or 100ml) |
| 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. | • No added salt or<br>Salt/ sodium free (≤5mg sodium per 100g) or<br>Very low in salt/ sodium (≤40mg per 100g) or<br>Low in sodium (≤120mg per 100g) or<br>Reduced sodium (if sodium content per reference quantity is ≤ 15% of sodium RDA of 2000mg) |
| | 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. | • Low in saturated fat (≤1.5g saturated fat per 100g, and ≤10% of kilocalories from saturated fat) or<br>Free of saturated fat (≤0.5g saturated fat per 100g, and ≤1% of the total fat is trans fat) and<br>• Free of trans fat (<0.5g per 100g) and<br>• Low in sugar (≤5g per 100g or ≤2.5 g per 100ml) or<br>Sugar free (≤0.5g per 100g) or Unsweetened or No added sugar; and<br>• Cholesterol at ≤100mg per 100g and<br>• Its reference quantity should not exceed 25% of sodium RDA, which is taken as |

| Related Disease | Claim | Criteria |
|---|---|---|
| | | 2000mg |
| | 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. | • A product from these food groups - whole grains, fruit, vegetables or fibre fortified foods; and<br>• Low in fat: ≤3g fat per 100g or ≤1.5g fat per 100ml, or Fat free: ≤0.15g fat per 100g or 100ml; and<br>• High in dietary fibre: ≥3g per 100 kcal or ≥6g per 100g or 100ml; and<br>• With at least 25% of the dietary fibre comprising soluble fibre. |
| | 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 | • Phytosterols, phytosterol esters, phytostanols or phytostanol esters may only be added to —<br>a. any edible vegetable fat or oil containing not more than 20 g of saturated fat per 100 g of total fat;<br>b. any margarine or fat spread containing not more than 27 g of saturated fat per 100 g of total fat; or<br>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.<br>• The following mandatory information must be declared on the product label:<br>a. The product is a special purpose food intended for people who want to |

| Related Disease | Claim | Criteria |
|---|---|---|
| | | lower their blood cholesterol level;<br>b. The product may not be nutritionally appropriate for pregnant and breast-feeding women and children under the age of 5 years;<br>c. The product should be used as part of a balanced and varied diet;<br>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;<br>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<br>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. |
| | 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. | • The cholesterol, saturated fatty acids and trans fatty acids present in the food must be within the following levels:<br>(iii) in the case of solid food —<br>a. not more than 20 mg of cholesterol per 100 g; |

| Related Disease | Claim | Criteria |
|---|---|---|
| | | b. not more than 1.5 g of saturated fatty acids and<br>c. trans fatty acids per 100 g; and<br>d. not more than 10% of kilocalories from<br>e. saturated fatty acids and trans fatty acids; or<br>(iv) in the case of liquid food —<br>a. not more than 10 mg of cholesterol per 100 ml;<br>b. not more than 0.75 g of saturated fatty acids and<br>c. trans fatty acids per 100 ml; and<br>d. not more than 10% of kilocalories from<br>e. saturated fatty acids and trans fatty acids.<br>• The following mandatory information must be declared on the product label:<br>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<br>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 |

| 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. | • A product from these food groups - whole grains, fruit, vegetables or fibre fortified foods; and<br>• Low in fat (≤3g fat per 100g or ≤1.5g fat per 100mL), or Fat free (≤0.15g fat per 100g or 100mL); and<br>• High in dietary fibre (≥3g per 100kcal or ≥6g per 100g); and<br>• Reference quantity of the food product should not contain sodium in an amount exceeding 25% of sodium RDA, which is taken as 2000mg. |

# 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.

| **Examples of diseases, conditions and disorders to which no reference may be made in claims** |
|---|
| • Circulatory system of the body<br>  ○ Hypertension, stroke, cholesterol disorders, reduces cholesterol, regulates platelet aggregation, coagulation defects, arteriosclerosis.<br>• Eye, ear, nose<br>  ○ Blindness, cataract, deafness, inflammation<br>• Digestive system<br>  ○ Periodontitis, ulcers, gastritis, hepatitis, liver cirrhosis, fatty liver, diarrhoea, constipation, inflammation of the intestines/liver/pancreas<br>• Endocrine system<br>  ○ Diabetes, thyroid disorders, hypothyroidism, prostate diseases, thymus disorders, hormonal regulation<br>• Metabolic system<br>  ○ Obesity, weight loss<br>• Respiratory system<br>  ○ Asthma, tuberculosis, bronchitis, sinusitis<br>• Skin, hair, nails<br>  ○ Fungal infection, eczema, ulcers, warts, moles, pigmentation disorders<br>• Immune system<br>  ○ Leprosy, AIDS, allergies, immunisation<br>• Muscular, connective tissues and skeletal systems |

- 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[1] (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**<br><br>**e.g. *"Pre+Pro Bio"*** | **(b) Nutrition claims**<br><br>**e.g. *"Calci-Vita Plus Formula"*** | **(c) Health claims**<br><br>**e.g. *KiD Bone ™*** |
| **(1) Declare qualifying statement on both food label and print advertise-ment** | Statement to indicate / specify the absence, presence or addition of the ingredients or the blend of ingredients<br><br>eg, *"Pre+Pro Bio is an unique blend of the prebiotic inulin, and the probiotic Lactobacillus acidophilus."* | Statement to indicate / specify the nutrition claim<br><br>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).<br><br>eg, *"**KiD** Bone ™ contains vitamin K and vitamin D which work synergistically on bone metabolism to build strong bones."* |
| **(2) Declare the ingredients / nutrients added under the statement of ingredients on food labels** | 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 |

| | | | |
|---|---|---|---|
| **(3) Declare nutrient content under the Nutrition information panel on food label** | - | Declare the nutrient content | Declare the content of nutrients contributing to the health claims |
| **(4) Meet the minimum nutrient / food constituent requirement** | - | Meet the criteria stipulated under:<br>i) Food Regulations (for vitamins, minerals, energy and protein)<br>ii) Handbook on Nutrition Labelling (Singapore) – for other nutrient content claims | Meet the criteria stipulated under:<br>i) Food Regulations (for vitamins, minerals, energy and protein)<br>ii) Handbook on Nutrition Labelling (Singapore) – for other nutrient content claims not specified under the Food Regulations<br>iii) Guide to Food Labelling and Advertisement - for health claims on food ingredient / constituent |

# 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***

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