

*Labelling Requirements for Infant formula based on the Singapore Food Regulations
(as of 30 August 2019, with editorial amendments in Oct 2022)*

Labelling Requirements under Regulations 5, 9, 10 and 254 of the Singapore Food Regulations for Infant Formula¹

The following information has to be declared on the product label² in English.

Regulation(s)	Labelling requirements	Explanation
5(4)(a), 254(1)	Common name of product, in printed letters not less than 1.5mm in height	For example, “infant formula” / “follow-on” formula
5(4)(b), (ea)	The statement of ingredients, in printed letters not less than 1.5mm in height	All ingredients and additives used to be listed in descending order of the proportion by weight in which they are present
5(4)(d)	Net quantity of the food present in the package, in printed letters not less than 1.5mm in height	In terms of “net” weight, for example, “Net: 1.8kg”
5(4)(e)	The name of the country of origin	The last processing place of the food
5(4)(e)	Name and address of Singapore business entity	The name and address of the Singapore importer, distributor or agent. This can be included after the product is imported, before sale in Singapore.
10	Date marking, in printed letters not less than 3mm in height	The expiry dates of prepacked food products may be declared in one of the following ways: <ul style="list-style-type: none"> • “USE BY (here insert the day, month and year)”; • “SELL BY (here insert the day, month and year)”; • “EXPIRY DATE (here insert the day, month and year)”; • “BEST BEFORE (here insert the day, month and year)”.
254(2)(a)	Directions as to the method of preparing the food	Information on how the formula is prepared (in graphic or words)
254(2)(aa)	Warning about the health hazards of inappropriate preparation, storage and use of the product	Directions on the preparation of the infant formula should be accompanied by a warning about the health hazards of inappropriate preparation, storage and use of the product

¹ For the purpose of this document, the term “infant formula” also includes any component, ingredient, constituent, or any other feature of the infant formula.

² Under Sale of Food Act (Chapter 283), “label” includes any tag, brand, mark or statement in writing or any representation or design or other descriptive matter on or attached to or used or displayed in connection with or accompanying any food or package containing food.

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Regulation(s)	Labelling requirements	Explanation
254(2)(b), (c)	Nutrition information panel	To be declared with the following nutrients present in per 100 ml or other equivalents of formula prepared in accordance with the directions on the label: (i) the amount of energy; (ii) the number of grams of protein, fat and carbohydrate; and (iii) quantity of each vitamin and mineral.
254(2)(d)	A statement suggesting the amount of the prepared food to be given each time	Information on the amount of the formula to be given each feed
254(2)(d)	The number of times such amount is to be given per day; such statement shall be given for each month of the infants' age up to 6 months	The number of servings to be given per day for infants up to 6 months of age
254(2)(e)	Directions for storage and information regarding its keeping qualities before and after the container has been opened	Information on how the formula should be stored before and after opening the container
254(2)(f)	Statement that infants over the age of 6 months should start to receive supplemental foods in addition to the formula	Information that complementary food has to be introduced for infants over 6 months of age Formula milk for infants aged 0-6 months are not required to carry this notification.
254(2)(g)	Statements to ensure that consumers understand that <ul style="list-style-type: none"> • breast milk is best for infants; and • the infant formula should be used on the advice of a doctor or healthcare practitioner. <p>Such statements shall be preceded by the words "Important Notice" or equivalent terms.</p>	An example of such notification is shown as below: Important notice: Breast milk is the best food for your baby. Before you decide to use this product, consult your doctor or healthcare professional for advice.

Use of claims on label and advertisement³ of infant formula

Prohibited statements

- The product should not carry any claims or suggestion whether in the form of a statement, word, brand, picture, or mark purporting to indicate the nature, stability, quantity, strength, purity, composition, weight, origin, age, effects, or proportion of food or its ingredients that is false, misleading or deceptive, or is likely to create an erroneous impression regarding the value, merit or safety of the food.
- The product should not carry any claims to suggest or imply that:
 - (i) the food has therapeutic or prophylactic action;
 - (ii) the food will prevent, alleviate or cure any disease or condition affecting the human body; or
 - (iii) that health or an improved physical condition may be achieved by consuming the food.
- The label must not include any claim or suggestion that may be interpreted as advice of a medical nature from any person whatsoever.

(A) Prohibition of use of health claims which states, suggests or implies that the infant formula has, or may have, a health effect

- “Health effect” means an effect on the human body, including an effect on one or more of the following:
 - (a) growth and development;
 - (b) physical performance;
 - (c) mental performance;
 - (d) a biochemical process or outcome;
 - (e) a physiological process or outcome;
 - (f) a functional process or outcome.
- In principle, claims regarding health effect are intended to correspond to “health claims⁴” as defined under the “Codex Guidelines for Use of Nutrition and Health Claims”, established by the international food standards-setting body, the Codex Alimentarius Commission.
- Some examples of prohibited claims regarding health effect are:
 - (i) Nutrient function claims
 - (ii) Other function claims
 - (iii) Implied health claims

³ Under Sale of Food Act (Chapter 283), “advertisement” means any of the following where used or apparently used to promote, directly or indirectly, the sale of food:

(a) any words, whether written or in an audible message;
(b) any still or moving picture, sign, symbol or other visual image or representation;
(c) any combination of 2 or more of those things in paragraph (a) or (b), but does not include communications of personal opinion made by an individual (for no commercial gain) to the public or a section of the public in relation to any goods or services, brand of goods or services, or person who provides goods or services

⁴ SFA adopted the definition for health claim endorsed by the Codex Alimentarius, the international food standards setting body. Under the “Codex Guidelines for Use of Nutrition and Health Claims”, “health claims” means any representation that states, suggests, or implies that a relationship exists between a food or a constituent of that food and health. Health claims commonly found on infant formula include:

- (i) Nutrient function claim - refers to nutrition claims that describe the physiological role of the nutrient in growth, development and normal functions of the body.
- (ii) Other function claim - refers to claims concerning specific beneficial effects of the consumption of foods or their constituents, in the context of the total diet on normal functions or biological activities of the body, and relating to a positive contribution to health or to the improvement of a function or to modifying or preserving health.

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- A non-exhaustive list of health claims that should not be used are tabulated below:

Nutrient function claims	<ul style="list-style-type: none"> • “Choline helps support overall mental functioning” • “Iron supports the child’s natural defences” • “Zinc helps in physical development” • “Zinc supports the child’s natural defences”
Other function claims	<ul style="list-style-type: none"> • “DHA and ARA are important building blocks for development of the brain and eyes in infant” • “Nucleotides support body’s natural defences” • “Nucleotides are essential to normal cell function and replication, which are important for the overall growth and development of infant” • “Taurine helps to support overall mental and physical development.” • “Oligofructose (fructo-oligosaccharides) 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.” • “Prebiotic promotes the growth of good <i>Bifidus</i> bacteria to help maintain a healthy digestive system.” • “Prebiotic blend (galacto-oligosaccharides and long chain fructo-oligosaccharides) support the child’s natural defences.” • “Probiotics to help maintain a healthy digestive system” • “Probiotics helps in digestion.” • “Probiotics helps to maintain a desirable balance of beneficial bacterial in the digestive system.” • “Probiotics helps to suppress/fight against harmful bacteria in the digestive system, thereby helping to maintain a healthy digestive system.” • “Probiotics” • “Prebiotics”
Implied health claims	<p>(i) Words or pictorial illustrations⁵, 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</p> <ul style="list-style-type: none"> • “Clinically proven”, “Expert Care” • “Sensitive”, “Gentle”, “Hypoallergenic”, “Comfort” • “Risk of allergy”, “For fussiness, gas” <p>(ii) Words or pictorial illustrations that relate to intellectual potential</p> <ul style="list-style-type: none"> • “Intelligent”, “bright”, “clever”, “smart” • Mascot wearing school uniform, mortar board, graduation gown, medical gown, astronaut attire, etc. <p>(iii) Words or pictorial illustrations portraying that the character is performing an action that would refer or allude to certain/enhanced ability beyond what infants can reasonably achieved</p> <ul style="list-style-type: none"> • Mascot reading, writing, fixing puzzle, etc • Mascot with abacus, medal, trophy, microscope etc <ul style="list-style-type: none"> • The above descriptions (i) to (iii) would include words in any languages, singly or with affix <ul style="list-style-type: none"> • “proBone”, “XtraCare”, “HappiTummi”, “HealthGuard” • The above descriptions (i) to (iii) would also include acronyms and/or “sounds-like” <ul style="list-style-type: none"> • “e-mune” sounds similar to “immune” • “ez” sounds similar to “easy” • “dzgest” sounds similar to “digest”

⁵ For the purpose of this document, “pictorial representation” includes a graphic representation and an anthropomorphic or humanlike depiction.

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(B) Prohibition on idealisation of infant formula

- A claim is taken to idealise the use of infant formula if the label or advertisement contains
 - (i) Images of infants
 - (ii) Images or texts on pregnant women or nursing women
 - (iii) Claims which directly or indirectly compare the infant formula or a component, ingredient, constituent or other feature of the infant formula to breast milk. A non-exhaustive list of claims that should not be used are listed below:
 - Words like “humanised” or “maternalised”, or words of similar import;
 - Reference to “breastmilk”, “breastfeeding”, “moving on from breastfeeding” or “closer to/inspired by breastmilk”, “{name of ingredient} sourced/obtained from breastmilk” or “{name of ingredient} similar to breastmilk”;
 - (iv) Claims which directly or indirectly idealise the use or effect of infant formula. These include:
 - Representations which suggest or imply that the use or consumption of the infant milk formula results in exaggerated health or other effect;
 - Claims, which suggest that the infant formula is the ideal source of food for infants, for example, “the best” or “the ideal method of infant feeding”, “complete nutrition”, “provides balanced nutrition”.
 - (v) Information to discourage breast feeding.

(C) Prohibition and restriction on use of nutrition claims

- Labels and advertisements for infant formula **must not contain** claims with respect to energy, carbohydrate and nutrients listed under Regulation 252(3). The list of nutrients is as tabulated below.

1. Energy	11. Vitamin B6	21. Calcium
2. Carbohydrate	12. Folic acid	22. Phosphorus
3. Protein	13. Pantothenic acid	23. Magnesium
4. Fat	14. Vitamin B12	24. Iron
5. Vitamin A	15. Vitamin K1	25. Iodine
6. Vitamin D	16. Vitamin H	26. Copper
7. Vitamin C	17. Vitamin E	27. Zinc
8. Vitamin B1	18. Sodium	28. Manganese
9. Vitamin B2	19. Potassium	29. Selenium
10. Nicotinamide	20. Chloride	

- Some examples of nutrition claims that cannot be used are:
 - (i) Claims on specific nutrients such as “*Contains vitamin D*”; “*Enriched with iron*”
 - (ii) Claims on group of nutrients such as “*Contains essential nutrients*”, “*Added with vitamins and minerals*”, “*Antioxidants*”, “*System of nutrients*”, “*Nutrient blend*”

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(I) Restricted claims: For infant formula added with hydrolysed milk protein or whey protein

- Claims on the addition of hydrolysed milk protein or whey protein in infant formula are allowed, and their presence must be clearly disclosed under the statement of ingredients on the product label.
- Such infant formula may carry the following claims:
 - “Contains partially hydrolysed whey protein”
 - “Added with extensively hydrolysed protein”

(II) Restricted claims: For infant formula which is sold or to be sold as lactose free or low lactose

- The total lactose content of the infant formula is not greater than 10mg in per 100kcal; and
- The label must include –
 - a. The words “lactose free” or “low lactose”, or words of similar import;
 - b. A statement within the nutrition information panel on the label, specifying the exact amount of lactose in the infant formula; and
 - c. The words “Not suitable for infants with galactosaemia” in the same font and size as, and in close proximity to, the words mentioned in sub-paragraph (a), if the infant formula is manufactured from protein sources other than soya protein isolates.
- Some examples of such claims are presented below:

Acceptable claims	Not acceptable to be used
<ul style="list-style-type: none"> • Lactose free - Not suitable for infants with galactosaemia • No lactose - Not suitable for infants with galactosaemia • Zero lactose - Not suitable for infants with galactosaemia 	<ul style="list-style-type: none"> • Lower lactose • Reduced lactose

(III) Restricted claims: For infant formula added with specific ingredients

- Claims with respect to the presence of ingredients listed under Regulation 252(5) and 252(6) are permitted under the conditions that the claims do not in any way imply that the infant formula is enriched, fortified, or is an excellent source of these ingredients. The non-exhaustive list of nutrients is as tabulated below.

1. Essential amino acids in natural L forms: <ul style="list-style-type: none"> • Isoleucine • Leucine • Lysine • Methionine • Phenylalanine • Threonine • Tryptophan • Valine 	2. Nucleotides <ul style="list-style-type: none"> • Cytidine 5'-Monophosphate • Uridine 5'-Monophosphate • Adenosine 5 - Monophosphate • Guanosine 5'-Monophosphate • Inosine 5'-Monophosphate 	3. Long chain polyunsaturated fatty acids [including docosahexaenoic acid (DHA) and arachidonic acid (AA)] <ol style="list-style-type: none"> 4. Galacto-oligosaccharides (GOS) 5. Long chain inulin 6. Oligofructose produced from inulin 7. polydextrose 8. Bovine lactoferrin 9. Beta-palmitin 10. 2'-fucosyllactose (2'-FL) 11. Lacto-N-neotetraose (LNnT)
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- Some examples of such claims are presented below:

Acceptable claims	Not acceptable to be used
<ul style="list-style-type: none"> • “Contains DHA” • “Contains GOS” • “With inulin” • “Added with GOS” • “Added with <i>Bifidobacterium lactis</i> {<i>must specify the exact specie</i>}” 	<ul style="list-style-type: none"> • “High/Rich in DHA” • “XX% higher in GOS/ More GOS” • “Rich source of inulin” • “Added with prebiotic* (GOS)” • “Added with probiotics”