

RESPONSES TO COMMENTS RECEIVED FROM THE PUBLIC CONSULTATION ON PROPOSED AMENDMENTS TO THE FOOD REGULATIONS REGARDING GENERAL LABELLING REQUIREMENTS FOR PREPACKAGED FOOD PRODUCTS

(updated as of 28 February 2022)

SFA has received further comments regarding compound ingredients constituting less than 5% of the food after the publication of the document, "*Responses to comments received from the public consultation on Proposed Amendments to the Food Regulations regarding General Labelling Requirements for Prepackaged Food Products*" on 04 March 2021. SFA has carefully considered these comments and our updated response on the matter is provided in section 4d this document.

The Singapore Food Agency (SFA) initiated a public consultation exercise for the period 15 October 2020 to 20 November 2020. Feedback was sought from stakeholders on the proposed changes to the labelling requirements for prepacked food sold in Singapore, under the following regulations of the Singapore [Food Regulations](#).

- a. Regulation 5 – General requirements for labelling
- b. Regulation 6 – Exemptions from regulation 5
- c. Regulation 9 – Prohibition on false or misleading statements, etc., on labels
- d. Regulation 9B – Limitations on making particular statements or claims on labels

SFA received a total of 40 responses. Respondents were generally supportive of the proposed amendments. SFA's responses to the matters raised by respondents are tabulated in **Table A** as appended.

SFA appreciates the time taken by stakeholders to submit feedback and comments which would contribute to the decision-making process. Following this consultation, SFA will review the proposed amendments, taking into consideration the comments received.

We would like to encourage all food industry members to actively participate in future consultation.

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**ANNEX**

**Table A: Response to comments provided by stakeholders**

| <b>1a. Comments on proposal to mandate lot identification (77.5% of respondents agreed)</b>                                                                                                                                                                                                                                                                                                                                                      | <b>SFA's response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| <p>Respondents raised two concerns:</p> <p>(i) Lack of resources (e.g. administrative capabilities to implement system) for small-scale businesses or food that are produced in small production batches to be labelled with lot identification.</p> <p>(ii) Whether there would be specific formats for lot identification, as the businesses were already implementing their own lot identification using the date marked on the products.</p> | <p>Lot identification facilitates the traceability of food and is important in the event of a food safety issue. Food safety incidents such as physical contamination (e.g. foreign matter) or microbiological contamination, tend to affect specific lot(s) of product. Being able to identify the specific affected lot of products, would help food businesses minimise losses during a food recall.</p> <p>SFA does not intend to specify any formats for the lot identification as food businesses may have their unique way of identifying a production lot. Lot identifications may be in codes developed by food manufacturers or by using date markings (e.g. expiry or production dates). The lot identification labelled must allow food businesses to identify the producing factory and/or the production lot. This information would help businesses and consumers identify the exact lot of products that are affected in the event there is a food safety incidence.</p> <p>SFA encourages food businesses that have not implemented any forms of lot identification to develop ways to identify a particular lot of production, as part of the traceability system.</p> |

| <b>1b. Comments on proposal to mandate instructions for use (85% of respondents agreed)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>SFA's response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <p>Respondents raised the following concerns on the proposal to mandate instructions for use:</p> <ul style="list-style-type: none"> <li>(i) Some food products could be prepared and consumed in multiple ways</li> <li>(ii) Space limitation of product label to include instructions for use.</li> <li>(iii) The information should be included only when it is reasonably expected to be provided. (e.g. whether a reasonable man would know how to use the prepacked food without the instructions labelled.)</li> </ul> <p>Respondent also sought clarification on when instructions for use would be applicable.</p> | <p>SFA proposed to include instructions for use, on the label where applicable. The intent of this information is to help ensure correct utilization of the food by consumers to minimise food safety incidences due to mishandling of the food.</p> <p>Cooking instructions for different recipes for other purposes (e.g. palatability of product) may be included on a voluntary basis.</p> <p>SFA will include examples on when instructions for use would be applicable under the industry's labelling guidance document (i.e. Guide to Food Labelling and Advertisement).</p> |
| <b>2. Comments on proposal to remove the minimum font size requirement for information to be declared (97% of respondents agreed)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>SFA's response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p>One respondent raised a concern that the removal of the minimum font size requirement as the general principle of "clearly legible" varies from person to person.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>SFA proposed to remove the requirement under Regulation 5(6) of the SFR which specifies a minimum font size for the information to be declared, and to retain the general principle that the information to be declared must be clearly legible. This is in line with the recommendation from the international standards set by Codex and would provide flexibility for food businesses to present the information on the label.</p>                                                                                                                                            |

| <p><b>3. Comments on proposal to provide the following information for food made available for sale through online platforms.</b></p> <p><b>a. Name of food</b></p> <p><b>b. List of ingredients (including the declaration of tartrazine and food known to cause hypersensitivity)</b></p> <p><b>c. Net contents and drained weight</b></p> <p><b>d. Name and address of manufacturer, packer, distributor, importer, export or vendor of the food</b></p> <p><b>e. Name of the country of origin</b></p> <p><b>f. Instruction for use</b><br/><i>(79% of respondents agreed)</i></p>                                                                                                                                                                                                                                                                    | <p><b>SFA's response</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <p>Respondents provided the following general comments:</p> <p>(i) The proposed list of information was too long and consumers would lose interest.</p> <p>(ii) Confidentiality of information</p> <p>(iii) Food businesses would need sufficient grace period for implementation</p> <p>Respondents also sought clarification on the following:</p> <p>(iv) what "online platform" encompasses (i.e. locally managed websites or overseas managed websites)</p> <p>(v) the responsibility of person putting up the information and its truthfulness</p> <p>(vi) whether the information is required for websites that do not have any sale activity</p> <p>Respondent suggested to allow a photo of the product packaging to be displayed, consisting of all required information, in replacement of listing the information on the online platform.</p> | <p>SFA proposed for the list of information to be provided on e-commerce platforms selling food to consumers in Singapore. The requirements will apply to e-commerce platforms that are within Singapore's jurisdiction (i.e. e-commerce platforms that have a local office).</p> <p>The list of information is part of the general labelling requirements that are currently required to be declared on prepackaged food. Food businesses may either list the information on the online platform selling the product or display a photo of the product packaging with the information clearly legible.</p> <p>The additional information will allow our local e-commerce platforms to provide consumers better food safety assurances. Consumers would be able to make informed food choices at point of purchase and be better assured when buying from local e-commerce platforms. There are also plans to educate consumers so that they know that the local platforms will be able to provide the info and hence better protect the consumer's food safety interest</p> <p>SFA will provide a grace period for food businesses to implement the new measures.</p> |
| <p>Respondents raised concerns that drained weight would not be applicable for all food products and suggested to include text like "as required" for drained weight.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>SFA proposed for net quantity to be included as one of the information to be declared on online platform selling food.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>The declaration of net quantity is currently one of the mandatory general labelling requirements on prepackaged food. Net quantity of the food may be expressed in the following manner:</p> <ol style="list-style-type: none"> <li>a. For liquid foods, by volume;</li> <li>b. For solid foods, by weight;</li> <li>c. For semi-solid or viscous foods, either by weight or volume; and</li> <li>d. For a food packed in liquid medium, by net weight of the food together with the liquid medium, and by drained weight of the food.</li> </ol> <p>Examples of products that require or do not require drained weight declaration can be found in the Guide to Food Labelling and Advertisements.</p> |
| <p>Respondents raised the following concerns on providing the name and address of local food business operator on online platforms:</p> <ol style="list-style-type: none"> <li>(i) The address for some food businesses selling food on the online platform may be residential address</li> <li>(ii) The local food business declared could perform multiple roles (e.g. importer, packer, or agent), and it would be difficult to specify the role of the company declared.</li> </ol> <p>One respondent also commented that consumers would be able to find out the food business address if the name of the food business was declared. Hence, it would not be necessary to include the address.</p> | <p>SFA proposed for online platforms selling food to provide the name and address of the local food business operator. The information is important for traceability purposes and food businesses must be accountable for the food they sell in Singapore.</p> <p>Therefore, the address of the local food business operator must be stated to allow consumers to better identify and contact the food business operator, if necessary.</p> <p>The food business operator could be any business or person undertaking in whole or part, handling of food intended for sale; sale of food; or primary food production. Only one set of name and address would be required.</p>                              |
| <p>One of the respondents raised concern on providing the name of the country of origin for the food on online platforms, as the same product could be manufactured in multiple countries.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>SFA proposed for online platforms to provide the name of the country of origin for the food products for traceability and the same information is required to be declared on the product label.</p> <p>For same product sourced from different countries, the declaration of multiple countries on the online platform would be acceptable if the company ensures that such manner of declaring the country of origin is clear to consumers and that the company can differentiate the food in the same pack, when needed. However, there can only be 1</p>                                                                                                                                             |

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|  | <p>country of origin (i.e. last processing place) declared on the product label.</p> <p>Currently, for food that are processed in multiple countries and packed in Singapore, they may be declared as “Product of Country A, Packed in Country B”, where Country B is the last processing place.</p> <p>Consumers have the right of choice to purchase products of their preference, and transparency of such information at point of sale would reduce unnecessary disputes.</p> |
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| 4a. Comments on proposal for the statement of ingredients to be declared under appropriate heading (e.g. “Ingredients”) and to declare the ingredients in descending order based on the ingoing weight at the time of manufacture (89% of respondents agreed)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | SFA’s response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| <p>Respondents raised the following concerns to declare the ingredients used in descending order based on the ingoing weight at the time of manufacture:</p> <p>(i) Difficulty in gauging the actual weight of the ingredient</p> <p>(ii) Certain ingredients could be repeated, and food manufacturer might prefer to group these ingredients based on certain functions to make the ingredient list more concise and easier to read.</p> <p>(iii) The ingoing weight of the ingredient may not be the final proportion of ingredients sold to consumers due to loss during processing (for example, water). To address the concern, one respondent proposed to allow industry to decide on appropriate manner to determine the basis of “descending order”, based on manufacturers’ understanding of the product.</p> | <p>Based on Regulation 5(4)(b) of the Food Regulation, prepackaged food made of two or more ingredients are required to be labelled with a statement of ingredients. The statement of ingredients could be declared in the following methods:</p> <p>a. the quantity or proportion of each ingredient and additive used are declared</p> <ul style="list-style-type: none"> <li>• in this case, the ingredients and additives could be declared in any order.</li> </ul> <p>b. all ingredients and additives to be declared in descending order of the proportions by weight in which they are present</p> <ul style="list-style-type: none"> <li>• in this case, the quantity or proportions of ingredients and additives used do not have to be disclosed.</li> </ul> <p>Most prepackaged food products sold in Singapore are using method (b). Currently, the “descending order of the proportions by weight” can be derived based on final weight.</p> <p>SFA took reference from the Codex Standards and proposed for the “descending order of the proportions by weight” to be based on ingoing weight. The proposal would provide clarity and consistency on how consumers could interpret the statement of ingredients, as well as to ensure fair level playing field for the industry.</p> <p>SFA noted the concern on loss of moisture due to processing and would address it in <b>question 4c</b>).</p> <p>The declaration of added water would not be required when:</p> <p>a) the water forms part of an ingredient such as brine, syrup or broth used in</p> |

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|  | <p>a compound food and declared as such in the list of ingredients; and</p> <p>b) water or other volatile ingredients would be evaporated in the course of manufacture.</p> |
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| 4b. Comments on proposed list of general class names for ingredients and additives (94% of respondents agreed)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | SFA's response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| <p>Respondents noted that the general class name, "edible gum", for acacia, karaya, tragacanth, carob, gellan, ghatti, guar and xanthan gums, which was in the First Schedule of the Food Regulations, was not included in the proposed list.</p> <p>Respondents also sought clarification on the type of sucrose that would qualify for the general class term, "sugars".</p> <p>Respondents proposed to amend and include the following general class names:</p> <ul style="list-style-type: none"> <li>(i) to allow the term, "hydrogenated fats/oil" for fully hydrogenated fats and oils</li> <li>(ii) to amend general class name for "flavour(s) and flavouring(s)" to "flavour(s) <b>or</b> flavouring(s)", so that either terms could be used</li> <li>(iii) to include the general class name "milk solids", with reference to the guidance from other countries (in this case, Food Standards Australia New Zealand).</li> </ul> | <p>SFA will include the general class name for "edible gum" for acacia, karaya, tragacanth, carob, gellan, ghatti, guar and xanthan gums to be consistent with the existing First Schedule of the Food Regulations.</p> <p>With reference from the Codex Standard for Sugar (CXS 212-1999), the general class name, "sugar", which could be used for all types of sucrose, would refer to sucrose in different forms (e.g. white sugar, powdered sugar, icing sugar, raw cane sugar).</p> <p>The Food (Amendment No.2) Regulations 2020, which would come into operation on 01 June 2021, allowed any deodorised edible vegetable oil that is fully hydrogenated or not hydrogenated, when forming an ingredient of any food other than edible fats and oils, to be declared using the general class name, "vegetable oil/fat". The general class name must be qualified by the words 'fully hydrogenated' if appropriate. The amendment was part of Singapore's measure to prohibit the use of partially hydrogenated oils (PHO) in food for sale in Singapore.</p> <p>On the comment for "flavour(s) and flavouring(s)", both terms could be used.</p> <p>SFA takes reference from international standards (i.e. Codex) when establishing the list of general class names. Hence, the general class name "milk solids" will not be included into the proposed list as these terms are currently not in Codex's list.</p> |

| <p><b>4c. Comments on proposal to require declaration of added water under the statement of ingredients except when the water forms part of an ingredient such as brine, syrup or broth used in a compound food. (75% of respondents agreed)</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p><b>SFA's response</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <p>Respondents opined that water should not be declared under the statement of ingredients for the following reasons:</p> <ul style="list-style-type: none"> <li>• Water could be added as processing aids and has no functional or nutritional value</li> <li>• Water could be added to rehydrate or reconstitute an ingredient that was dehydrated, or for purpose of extraction</li> <li>• Water added to some products like (glazed frozen product) would be evaporated or eliminated in the final ready to eat food</li> </ul> <p>Respondents were also concerned that there would be a need for relabelling of products imported from countries which have yet to adopt Codex recommendation.</p> <p>Respondents also sought clarification on whether the first ingredient listed under the statement of ingredients should be "water" for liquid product (e.g. beverages).</p> <p>Some respondents proposed to exempt the declaration of water under the statement of ingredients in specific situations, taking reference from the requirements under other countries/region.</p> | <p>SFA took reference from the Codex General Standards for Labelling of Prepackaged Foods (CXS 1-1985 for the proposal for added water to be declared in the statement of ingredients).</p> <p>Under the said Standards, if the food product contains added water, it must be listed in the ingredients list according to its ingoing weight. The declaration of added water would not be required when:</p> <ol style="list-style-type: none"> <li>a. the water forms part of an ingredient such as brine, syrup or broth used in a compound food and declared as such in the list of ingredients; and</li> <li>b. water or other volatile ingredients would be evaporated in the course of manufacture.</li> </ol> <p>SFA have also proposed to adopt Codex's recommendation for the declaration of processing aid (see <b>question 4f</b>).</p> <p>SFA would also take into consideration the exemption criteria for declaration of water by other countries/regions, and further review the proposal.</p> <p>The industry will be given a 12-month grace period, to comply with the new labelling regulations.</p> |

| 4d. Comments on proposal that the breakdown constituents of a compound ingredient constituting less than 5% of the food do not have to be declared (5%-rule). (89% of respondents agreed)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | SFA's response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| <p><b>Concerns raised (as of 28 February 2022) [NEW]:</b></p> <p>There are certain ingredients that fall outside of the mandatory list of common classes of allergens to be declared, and for which some consumers may be allergic to. Consumers may unknowingly consume the food containing such ingredients and suffer an allergic reaction as they are not aware of the presence because the ingredients do not have to be declared due to the 5%-rule.</p>                                                                                                                                                                                                                                                                                     | <p><b><u>Response to further comments received (28 February 2022) [NEW]</u></b></p> <p>SFA noted that should the 5%-rule be implemented, this would affect the ability of consumers to make informed choices as not all ingredients would be declared.</p> <p>This poses a potential food safety concern to local consumers, in particular those consumers with allergies to ingredients that fall outside the common classes of allergens (e.g. sesame, mustard, celery) Consuming food with such ingredients may invoke an allergic reaction in these consumers. Therefore, to protect such consumers, SFA has decided to retain the current requirement on the declaration of breakdown constituents of compound ingredients under the statement of ingredients.</p>                                                                                                                                                                                                                                          |
| <p><b>Concerns raised as of 04 March 2021</b></p> <p>Respondents raised the following concerns on the proposal:</p> <ul style="list-style-type: none"> <li>(i) the lack of transparency especially on presence of allergens</li> <li>(ii) unfamiliar with the requirements for imported food</li> </ul> <p>Respondents also sought clarity on the following:</p> <ul style="list-style-type: none"> <li>(i) whether the “established standard” refer to the standards under the Codex General Standard for Food Additives (CXS 192-1995) or individual food standards established by Codex</li> <li>(ii) the meaning of “the breakdown constituent is not a food additive that serves a technological function in the finished product”</li> </ul> | <p><b>Response from SFA dated 04 March 2021 (Note: the response dated 04 March 2021 has been superceded by the response dated 28 February 2022 above)</b></p> <p>SFA proposed that the breakdown constituents of a compound ingredient constituting less than 5% of the food do not have to be declared, provided that:</p> <ul style="list-style-type: none"> <li>(i) the compound ingredient has an established standard in Codex standard or the Food Regulations; and</li> <li>(ii) the breakdown constituent is not a food additive that serves a technological function in the finished product.</li> </ul> <p>With the exemption, food business operators are not required to declare the breakdown constituents of compound ingredient which has an established food standard under Codex. The established food standard refers to the individual food standard under Codex and not the General Standard for Food Additives (CXS 192-1995). Food additives that are added to the compound ingredient</p> |

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|  | <p>and continue to serve technological function in the finished product have to be declared.</p> <p>The declaration of food and ingredients known to cause hypersensitivity to individuals (including food and ingredients that would cause allergy) would continue to be mandated, to protect public health.</p> <p>Local food business operators may refer to the SFA's <a href="#">Guide to Food Labelling and Advertisements</a>, which provides the explanation and checklist on how to comply with the labelling requirements for prepacked food product, or the SFA – Frequently Asked Questions for a quick reference on specific queries on labelling requirements.</p> |
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| 4e. Comments on proposal to declare the presence of an allergen in ingredients obtained through biotechnology (92% of respondents agreed)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | SFA's response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| <p>Respondents raised concerns on the following:</p> <ul style="list-style-type: none"> <li>(i) the term, "biotechnology" is a new and would need to be defined</li> <li>(ii) the approved list of genetic traits in Singapore is limited</li> <li>(iii) the declaration potentially creates fear in consumers</li> <li>(iv) the difficulty in implementation due to limited information from suppliers.</li> </ul> <p>One respondent highlighted that a study on risks of allergic reactions to biotech proteins in foods concluded that there were no biotech proteins found in food that are documented to cause allergenic reactions.</p> <p>Respondents also sought clarification on the following text as well as the definition for the term "marketed".</p> <ul style="list-style-type: none"> <li>• "When it is not possible to provide adequate information on the presence of an allergen through labelling, the food containing the allergen should not be marketed"</li> </ul> | <p>SFA proposed to adopt Codex's recommendation to require the declaration of the presence of an allergen in any food or food ingredients obtained through biotechnology that would cause hypersensitivity to individuals.</p> <p>Codex has also recommended that when it is not possible to provide adequate information on the presence of an allergen through labelling, the food containing the allergen should not be marketed for safety reasons.</p> <p>The requirement is not to mandate declaration of bioengineered or genetically modified food. It is intended to mandate disclosure of potential presence of genetic traits from an allergen.</p> <p>SFA noted a 2005 review<sup>1</sup>, which studied the potential relative risk of allergenic reactions to biotech proteins in foods, concluded that no biotech proteins in foods have been documented to cause allergic reaction.</p> <p>However, as the implications on risk of allergenic reactions due to biotechnology is inconclusive, SFA maintains the position to align with international standard to mandate the declaration of presence of an allergen in ingredients obtained through biotechnology.</p> <p>In this respect, when a vegetable oil is obtained through biotechnology of soybean, which is listed as an allergen, the presence of soybean must be disclosed under the statement of ingredients ("contains soya bean").</p> |

<sup>1</sup> Lehrer SB, Bannon GA. Risks of allergic reactions to biotech proteins in foods: perception and reality. *Allergy*. 2005 May;60(5):559-64. doi: 10.1111/j.1398-9995.2005.00704.x. PMID: 15813800.

| <b>4f. Comments on proposal on processing aids (94% of respondents agreed)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>SFA's response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| <p>Respondents requested for clarity on the definition of “a significant quantity or in an amount sufficient to perform a technological function in that food”.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>SFA proposed to include the text for carried over food additives to be declared under the statement of ingredients of the final food product, and to exempt processing aids from the declaration. The proposal is consistent with the current requirements, where all ingredients and additives used have to be declared under the statement of ingredients of the prepacked food.</p> <p>The proposal for inclusion is meant to provide clarity.</p> <p>SFA does not intend to set the exact quantity or amount of food additives that is sufficient to perform technological function as it would vary between with the nature of food (for example, composition, manufacturing process, technology and packaging of the food). However, the onus would be on food manufacturers to justify if the food additive continues to perform a technological function in the final food.</p> |
| <b>5. Comments on declaration of country of origin for locally manufactured food (86% of respondents agreed)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>SFA's response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <p>Respondents opined that the authorities (i.e. SFA) would be able to trace the origin of the product based on the name and address of the local food manufacturer, packer or producer declared.</p> <p>Respondents also requested for clarity on the types of qualifiers that could be used to declare the name of the country of origin for food products.</p> <p>One of the respondents shared the ongoing regulatory change in the European Union and the United Kingdom to make declaration of country of origin voluntary. It was noted that declaration for country of origin will be a voluntary for general food products except for certain food categories e.g. minced meat, beef, and veal; fruit and vegetables; olive oil; honey blends; eggs.</p> | <p>SFA proposed for the name of the country of origin of locally manufactured food to be declared. The name of the country of origin should be declared using appropriate qualifiers.</p> <p>Country of origin is one of the important information which consumers look out for when making food purchases.</p> <p>Currently, consumers may assume products that are not labelled with any country of origin to be locally processed, produced or manufactured, especially if the local food business declared is the vendor (e.g. distributor or agent for the product). The proposal will provide greater clarity to consumers on the country of origin of the product.</p> <p>Under SFA's Guide to Food Labelling and Advertisements, examples on description of</p>                                                                                                                    |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | manufacturing scenarios and their corresponding manner of declaration can be found.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>6. Comments for country of origin to be accompanied by suitable qualifiers (84% of respondents agreed)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>SFA's response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p>Respondents were concerned that the qualifiers would be restricted by specific wordings, which might incur additional cost for change in labelling.</p> <p>Respondents also suggested for SFA to provide clarity on acceptable 'appropriate qualifiers' to prevent differences in the interpretation.</p> <p>One respondent opined that country of origin should refer to the country where the product changes its nature as processed like rebottling and packing would not be a cause of concern to consumer safety. Therefore, it was suggested that the country of origin should reflect where the product undergoes processing which changes its nature instead.</p> | <p>Taking into consideration that a single food product may have undergone processing in multiple countries, the name of the country of origin would refer to the country where the handling of the food last took place (i.e. where the food is packed into primary packaging).</p> <p>The proposal to include qualifiers took into consideration that food may undergo different processing in multiple countries. For instance, a food might be processed in several countries before finally being packed in <i>Country X</i>. Appropriate qualifiers like "Packed in" / "Product of" / "Manufactured in", would provide clarity on the context to the name of the country of origin declared.</p> <p>SFA does not intend to restrict wordings for the qualifiers, as long as they reflect the true intent. SFA noted the suggestion to provide guidance and would provide food businesses with guidelines on examples of qualifiers that could be used based on different scenarios.</p> |
| <b>7. Comments on proposal for exemption on labelling requirements for food packed in small units (i.e. surface area less than 10cm<sup>2</sup>) (70% of respondents agreed)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>SFA's response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p>Respondents raised concerns that:</p> <ul style="list-style-type: none"> <li>(i) pertinent information like ingredients, presence of food and ingredients known to cause hypersensitivity to individuals (including allergens) must be declared for safety of consumers</li> <li>(ii) lot identification and date marking to be important information for consumers to identify a food.</li> </ul> <p>In view of the importance of the information, some respondents suggested for the information to be provided through means</p>                                                                                                                                        | <p>The proposal to exempt food packed in small units, where the largest surface area is less than 10 cm<sup>2</sup>, from declaration of the statement of ingredients (including food and ingredients known to cause hypersensitivity to individuals), lot identification, date marking (expiry date) and instructions for use, is in line with the recommendation by Codex.</p> <p>In view of the feedback received and concerns raised, SFA will further review the proposal and explore whether the information to be exempted can made</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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| <p>other than labels (e.g. online platform by scanning QR codes)</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>available through other means such as by scanning QR code etc.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p><b>8. Comments on proposal to prohibit claims that suggest a single food could provide adequate and balanced nutrition, and claims which could give rise to doubt about the safety of similar food or which could arouse or exploit fear in the consumer (89% of respondents agreed)</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p><b>SFA's response</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p>Respondents raised concerns that there could be different interpretation of what constitutes a “balanced and complete nutrition” by different jurisdictions and proposed for rewording of the proposed text.</p> <p>Respondents needed clarity on the types of food that could continue to be claimed as a complete nutrition for a specific group of consumers with particular nutritional needs; and what would be considered as essential nutrients.</p> <p>Respondents proposed that claims on absence of certain substances, specifically on the absence of antibiotics and hormones, should be considered to differentiate food that are manufactured/produced in specific manner to avoid the use of such substances.</p> <p>Respondents also sought clarity on the exact type of claims that would constitute as give rise to doubts on the safety of other food.</p> | <p>SFA proposed to prohibit the following types of claims on food:</p> <ol style="list-style-type: none"> <li>Claims stating that any given food will provide an adequate source of all essential nutrients, except in the case of well-defined products for which a Codex standard regulates such claims as admissible claims [or where appropriate authorities] have accepted the product to be an adequate source of all essential nutrients.</li> <li>Claims implying that a balanced diet or ordinary foods cannot supply adequate amounts of all nutrients.</li> <li>Claims that could give rise to doubts on the safety of a similar food</li> </ol> <p>Some food might be formulated with the intent to provide complete nutrition to specific group of consumers with particular nutritional needs. Hence, claims (a) and (b) may be allowed only if food businesses can justify that the food is specially formulated to meet the complete nutritional needs of a particular class of consumers (for example, meal replacements or food for special medical purposes).</p> <p>On claim (c), taking into consideration the concerns raised, SFA would provide a guidance document providing examples of what constitutes as claims that could give rise to doubts on the safety of a similar food.</p> |

| <b>9. Comments on criteria for the use of claims, “gluten free” and “reduced gluten” food (97% of respondents agreed)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>SFA’s response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| <p>Respondents suggested to:</p> <ul style="list-style-type: none"> <li>(i) allow alternate words like “low gluten” for products that meet the “reduced gluten” claims criteria</li> <li>(ii) remove the need for products substituting important basic foods, with “gluten free” or “reduced gluten” food, to supply approximately the same amount of vitamins and minerals as the original foods they replace, in view of variants in micronutrients of cereal grains</li> <li>(iii) allow flexibility on placement of the claim, “gluten-free”, to minimise unnecessary business cost in relabelling</li> </ul> <p>Respondents wanted clarification if the gluten content must be declared on the product label.</p> | <p>SFA proposed to include the definition and specific criteria for the use of the terms, “gluten free” and “reduced gluten” based on the recommendation by Codex, to safeguard consumers’ health.</p> <p>Codex currently does not provide definition nor criteria for the alternative terms to “gluten-free” such as “low gluten”. Products labelled with such alternative terms should meet the same criteria as “gluten free”. Similarly, we will also require alternative terms to “reduced gluten” such as “less gluten” to meet the same criteria as “reduced gluten”.</p> <p>Individuals who require a diet that is free from gluten or low intake of gluten, have to adopt diet suitable for them by replacing basic foods with foods that are gluten free or reduced gluten. Hence, it would be important to ensure gluten free or reduced gluten food continues to provide similar amounts of nutrients for normal functioning of the body.</p> <p>The use of the terms, “gluten-free” and “reduced gluten” are voluntary. However, the term “gluten free” when used, should be printed in the immediate proximity of the name of the product on any part of the label that is prominent and legible for consumers’ awareness.</p> |

Other than the questions posted in the consultation paper, SFA also received queries on other related labelling requirements.

| <b>Other comments/suggestions received</b>                                                                               | <b>SFA’s response</b>                                                                                                                                                                                                                                                                                                                                                   |
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| <p>Regulation 5(4)(ea) of the Food Regulations<br/>To replace the term, ‘hypersensitivity’ with the term ‘allergen’.</p> | <p>The term “hypersensitivity” used under Regulation 5(4)(ea) of the Food Regulations is aligned with the Codex Standard for the labelling of prepackaged foods (CXS 1-1985). This includes food that causes allergy to individuals, food that causes intolerance reaction to individuals and food that contains gluten affecting individuals with coeliac disease.</p> |