Checklist for Advertising Materials Artwork for Healthier Choice Symbol (HCS) Products

This checklist serves to provide a step-by-step guide to assist companies to self-check before submitting their advertising materials artwork for their HCS products on <u>HCS Online</u>.

All artworks and advertising material using or with reference to the HCS must be submitted to HPB, prior to printing, distribution, publishing or broadcasting. Advertising materials include, but not limited to, any of the following used to promote, directly or indirectly, the sale of food

- Words (e.g. written audible message)
- Still or moving picture, sign, symbol
- Any combination of 2 or more of the above

HPB will review and evaluate advertising materials artwork in accordance with the Singapore Food Regulations, Singapore Food Agency (SFA)'s A Guide to Food Labelling and Advertisements and Guidelines on Symbol Usage in the Handbook on Nutrition Labelling (Singapore), mainly looking out for

- Correct usage of HCS logo
- Validity of any Nutrient & Health Claims
- Any misleading claims or messages (visual or text) that goes against the principle of the HCS programme which aims to promote a balanced diet and healthy lifestyle

Along the way, we will also help to point out some of the misleading claims or messages (visual or text) that might contravene with Singapore Food Regulations.

All companies are reminded that it is the responsibility of the company to ensure that their HCS food products and label fully comply with the Singapore Food Regulations. Companies are also required to ensure that the advertisements used for their HCS food products do not carry claims prohibited under regulations 9 and 12 of the Food Regulations and comply with the guidelines in the Handbook on Nutrition Labelling (Singapore) and Advertising Standards Authority of Singapore (ASAS)'s Singapore's Code of Advertising Practice.

All companies are advised to refer to relevant documents including but not limited to, <u>Singapore Food</u>

<u>Regulations</u>, SFA's <u>A Guide to Food Labelling and Advertisements</u>, <u>HCS Nutrient Guidelines</u>, <u>HPB's A Handbook on Nutrition Labelling (Singapore)</u>, where necessary.

Please note that this checklist does not constitute a certification or an approval from the HPB. Approval from HPB is required before printing of advertising materials with the HCS logo. Printing and distribution of materials carrying HCS logo without HPB approval is an infringement of Trademark and a breach of Clause 4(h) and Clause 4(n) in the HCS Licence Agreement.

The checklist is split into 3 sections:

- 1. Checklist for General Requirements for Advertising Materials Artwork
- 2. Checklist for HCS logo
- 3. Checklist for Nutrient & Health Claims

For items marked "no" in any of these sections, please revise your advertising material accordingly before submission to HCS Online.

Please refer to HPB's A Handbook on Nutrition Labelling (Singapore) for a detailed guide.

Section 1: Checklist for General Requirements for Advertising Materials Artwork

The HCS Programme focuses on promoting a balanced diet and a healthy lifestyle, therefore all illustrations used on artworks for product packaging, advertisements and promotional materials will be considered in this context.

Consumer perception of the overall context of materials and illustrations will be reviewed prior to approval.

No.	Item	Yes	No
1	The product(s) in the advertising material has been approved by HPB to carry the HCS and is currently in a valid Licence Agreement with HPB		
2	The product(s) are already in the market or going to be in the market and have been listed in Product Listing tab in HCS Online		
3	The product packaging for the HCS product(s) featured in the advertising materials are the same as the approved product packaging artwork in HCS Online		
4	The advertising material complies with Singapore Food Regulations, SFA's A Guide to Food Labelling and Advertisements, HPB's A Handbook on Nutrition Labelling (Singapore) and Advertising Standards Authority of Singapore (ASAS)'s Singapore's Code of Advertising Practice.		
	Does the text/paragraph on the advertising materials comply with the Singapore Food Regulations, for example, the following regulations?		
	*Regulations 9 and 12 of the Singapore Food Regulations prohibit the use of the following in food labels and advertisements		
_	(a) Claims for therapeutic or prophylactic action or words of similar meaning, unless specifically permitted by these Regulations,		
5	(b) Any words, claims explicit or implicit, designs or devices which could be interpreted as advice of a medical nature from any person whatsoever.		
	(c) Any word or words implying that a food will prevent, alleviate or cure any disease or condition affecting the human body.		
	(d) Any words implying that health or an improved physical condition may be achieved by consuming any food.		
6	The advertising material does not contain information that is false, misleading, deceptive or is likely to create an erroneous impression of the food		
7	The claims and information used on the advertising material are factual, accurate and not misleading. Evidence such as scientific reports or statistical reports are required for support of statements or claims.		
8	The advertising material does not portray any conception of the product being 'good' or 'bad', 'healthy' or 'unhealthy'.		
9	The advertising material does not contain the following statements or statements bearing similar meaning:		

No.	Item	Yes	No
	i) 'First (or No. 1) in Singapore to carry the Healthier Choice Symbol', or related claims		
	ii) ' [Product Name] is endorsed by the Heart Promotion Board', or related claims		
	iii) ' The one and only product with the Healthier Choice Symbol'		
10	The advertising material does not contain any information (visual or text) that goes against the principle of the HCS programme which aims to promote a balanced diet and healthy lifestyle (e.g. inclusion of unhealthy cooking methods is not allowed)		
11	If there are multiple products featured in the advertising materials, and some products are not HCS products, it does not imply that the non HCS products are also HCS products or met the HCS nutrient guidelines.		
12	The advertising material includes "Eat All Foods in Moderation" statement.		
13	If the advertising material is featuring more than 1 HCS product with different taglines, the HCS logo with the 'Eat All Foods in Moderation' tagline is being used on the advertising material		

Section 2: Checklist for HCS logo

All companies are reminded that HCS logo is a Trademark. You may refer to Schedule 1 and 3 of the Licence Agreement, Handbook on Nutrition Labelling (Singapore) or the CI guide. You may download these documents from HCS webpage. The CI guide is also downloadable from HCS Online under Resources. For items marked "no", please revise your packaging artwork accordingly before submission to HCS Online.

No.	Item	Yes	No
1	The HCS used is the latest version and tallies with the HCS on the product packaging. If unsure if it is the latest version, please download the logo from HCS Online under Resources > Logo Gallery		
2	No changes, alterations or modifications were made to the HCS (e.g. skewing, rotating, disproportionate scaling, changing colour of outline, changing colour of pyramid)		
3	No changes, alterations or modifications were made to the HCS tagline (e.g. outline, shadow, glow, change in colour, change in font, change in font size, addition of white or black border, removal of HCS tagline)		
4	The HCS is not combined with any other graphic element or used as watermark		
5	The HCS and HCS tagline is not on a busy background that distorts the visibility of the HCS		
6	The HCS tagline is always black in colour, except when against a dark background		
7	The HCS is always with a tagline		
8	There is enough clear space around the HCS, tagline included. The clear space is determined by the height of the first 2 steps from the tip of the pyramid in the Symbol.		
9	The HCS does not touch the brand name of the product.		
10	The full colour HCS logo is used with the correct pantone colour codes as stated in the CI guide.		
11	The HCS is not visually associated with unrelated claims such as 'Fortified with Vitamins and Minerals', 'Low Lactose', 'No Preservatives', 'No Cholesterol' and 'Organic'.		
12	If the HCS carries comparative taglines like lower in sugar, lower in sodium, higher in calcium, the corresponding comparative statement has been included on the advertising materials. Example of the statement, "25% lower in sugar as compared to regular [range or name of food category]" or any other statement bearing similar meaning.		

Section 3: Checklist for Nutrient Claims, Nutrient Function Claims & Health Claims

For items marked "no", please revise your artwork accordingly before submission to HCS Online. For items not relevant, e.g. you are not making a nutrient function claim, you may put NA.

No.	Item	Yes	No
	Nutrient Claims		
1	When you want to make Nutrient Claims like Low in Fat, Low in Sugar, High in Dietary Fibre, High in Vitamin C, did you refer to any of the following documents?		
	1) SFA's A Guide to Food Labelling and Advertisements		
	2) A Handbook on Nutrition Labelling (Singapore)		
2	Do you have the relevant documents (e.g. lab report from accredited lab) to support the Nutrient Claims?		
3	Do the Nutrient Claims comply with SFA's A Guide to Food Labelling and Advertisements / A Handbook on Nutrition Labelling (Singapore)?		
4	If you would want to make comparative claim (e.g. lower in sugar), is the reference food one of the following?		
	i) The regular product which has been produced for a significant period by the manufacturer making the nutrient claim or		
	ii) A weighted average of an industry norm for that particular type of food or		
	iii) A food whose composition is determined by reference to published food composition tables.		
	Nutrient Functions Claims		
	When you want to make Nutrient Functions Claims like		
5	"Protein helps in tissue building and growth",		
	"Dietary fibre aids in digestive system"		
	Did you refer to SFA's A Guide to Food Labelling and Advertisements / Singapore Food Regulations?		
6	Do you have the relevant documents (e.g. lab report from accredited lab) to support the Nutrient Function Claims?		
7	Do the Nutrient Function Claims comply with SFA's A Guide to Food Labelling and Advertisements / Singapore Food Regulations e.g. meet the criteria for making the claim??		
8	The approved claims are not truncated or reworded to deviate from the original intended meaning.		
9	The claim does not state or imply that the nutrient is for prevention or treatment of a disease.		
	Health Claims		
10	When you want to make nutrient specific diet-related Health claims like the following:		

No.	Item	Yes	No
	"A healthy diet low in sodium may reduce the risk of high blood pressure, a risk factor for stroke and heart disease. <your name="" product=""> is sodium free."</your>		
	Did you refer to SFA's A Guide to Food Labelling and Advertisements / Singapore Food Regulations?		
11	Do you have the relevant documents (e.g. lab report from accredited lab) to support the Health Claims?		
12	Do the Health Claims comply with SFA's A Guide to Food Labelling and Advertisements / Singapore Food Regulations e.g. meet the criteria for making the claim?		
13	The approved claims are not truncated or reworded to deviate from the original intended meaning.		
14	The claim does not state or imply that the nutrient is for prevention or treatment of a disease.		
15	Nutrient Claims, Nutrient Function Claims & Health Claims are in English or with English translation if they are in other languages		