Checklist for Healthier Choice Symbol (HCS) Product Packaging Artwork

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

The product packaging artwork with the HCS logo and Nutrition Information Panel (NIP) has to be submitted when creating a new HCS application for HPB's review.

HPB will review and evaluate product packaging 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
- Correct presentation and information contained in the Nutrition Information Panel (NIP)
- Validity of 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.

However, it is the responsibility of the companies to ensure that their HCS food products and label fully comply with the Singapore Food Regulations. Companies are also required to ensure that HCS food products packaging 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). HPB's approval was only on the use of HCS logo and Nutrition Information Panel.

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</u> <u>on Nutrition Labelling (Singapore)</u>, where necessary.

Please note that this checklist does not constitute a certification or an approval from HPB. Approval from HPB via HCS Online is required before printing of product packaging with the HCS logo. Using the HCS logo on product packaging without HPB approval is an infringement of Trademark and a breach of Clause 4h and Clause 4n in the HCS Licence Agreement.

This checklist is split into 4 sections

- 1. Checklist for HCS logo
- 2. Checklist for Nutrition Information Panel (NIP)
- 3. Checklist for Nutrient & Health Claims
- 4. Checklist for Additional Requirements for Product Packaging Artwork

For items marked "no" in any of the 4 sections, please revise your packaging artwork accordingly before submission to <u>HCS Online</u>.

Please refer to the HPB's <u>A Handbook on Nutrition Labelling (Singapore)</u> for a detailed guide.

Section 1: 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 <u>HCS webpage</u>. 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 was the latest version. If unsure, please download the logo from <u>HCS</u> 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)		
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 distorted 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	The product packaging contains a maximum of 2 HCS with the same tagline		
9	The size of the HCS is at least 15 mm in diameter		
	There is enough clear space around the HCS, tagline included.		
10	The clear space is determined by the height of the first 2 steps from the tip of the pyramid in the Symbol.		
11	The HCS does not touch the brand name of the product		
12	The HCS does not cover any essential information on the product packaging or product label.		
13	The full colour HCS logo is used with the correct pantone colour codes as stated in the CI guide.		
14	The HCS is not visually associated with unrelated claims such as 'Fortified with Vitamins and Minerals', 'Low Lactose', 'No Preservatives', 'No Cholesterol' and 'Organic'.		

No.	Item	Yes	No
15	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 product packaging.		
	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.		
16	The HCS taglines used are the eligible taglines for the sub category		

Section 2: Checklist for Nutrition Information Panel (NIP)

For items marked "no", please revise your packaging artwork accordingly before submission to <u>HCS Online</u>. For items not relevant, e.g. you are not declaring polyunsaturated fat, you may put NA.

No.	Item	Yes	No
1	The NIP has a panel heading of 'Nutrition Information', 'Nutrition Facts' or words bearing similar meaning		
2	The text of the NIP is in English		
3	The text of the NIP is clear, legible and permanent		
	The NIP includes number of servings per package and serving size, with the serving size stated both in metric and common household measurements (e.g. pieces, cups, teaspoons). Please see below example.		
4	NUTRITION INFORMATION Servings per package: 10 Serving Size: 30 g (1 sachet)		
	The nutrients are displayed in Per Servings and Per 100g (for solid) or Per 100ml (for liquid) in the NIP. Please see below example.		
5	Servings per package: 10 Serving Size: 30 g (1 sachet)		
	Per serving Per 100 g Energy 198 kcal* 660 kcal* Protein 1.5 g 5.0 g		
6	The unit used for serving size tally with the unit used for Net Weight.		
	If your product is a reconstituted product e.g. powdered beverages, liquid concentrates, Asian recipe mix etc:		
7	1) Does it have a column of nutrients declared in per 100ml (as reconstituted) or per 100g (as prepared)?		
	2) Does it have an ** beside the column and a footnote at the bottom of the NIP table (**As reconstituted or as prepared according to label directions or statements bearing similar meaning)?		
	Please see below example.		

No.	Item	Yes	No
	NUTRITION INFORMATION Servings per package: 10 Serving Size: 30 g (1 sachet) Per serving Per 100 g Per serving Per 100 g Per serving Per 100 g Per serving 198 kcal* 660 kcal* 96 kcal* Protein 1.5 g 5.0 g 0.7 g		
	** As reconstituted according to label directions		
8	The NIP includes the 10 core nutrients: Energy, Protein, Total Fat, Saturated Fat, Trans Fat, Cholesterol, Carbohydrate, Total Sugar, Dietary Fibre and Sodium.		
9	Is Total Sugar, Dietary Fibre grouped with Carbohydrates?		
10	Is Total Sugar indented under Carbohydrates (as below)? Carbohydrates - Total Sugar		
11	If you are declaring Added Sugar and/or a breakdown of the sugars e.g. lactose, sucrose. Is it indented under Total Sugar (as below)? Carbohydrate - Total Sugar -Lactose		
12	Are all the fats grouped together?		
13	Is saturated fat and trans-fat indented under total fat, with trans-fat after Saturated fat (as below)? Total Fat - Saturated fat - Trans fat		
14	If you are declaring monounsaturated fat and/or polyunsaturated fat, is it grouped together with total fat and indented under total fat, after saturated fat? An example of polyunsaturated fat declared below: Total Fat - Saturated fat - Polyunsaturated fat		
15	If you are declaring Omega 3 and Omega 6 fatty acids, is it indented under polyunsaturated fat (as below)? Polyunsaturated fat - Omega 3 - Omega 6		

No.	Item	Yes	No
16	If you are declaring Omega 9 fatty acids, is it indented under monounsaturated fat (as below)? Monounsaturated fat - Omega 9		
17	 All nutrients in the NIP is declared in the appropriate metric units. 1) Is Energy declared in kcal or kJ? 2) Is Protein, Total Fat, Saturated Fat, Trans Fat, Carbohydrates, Sugar and Dietary Fibre declared in 'g'? 3) Is Cholesterol and Sodium declared in 'mg'? 		
18	 Energy is to be declared in kilocalories (kcal) and/or kilojoules (kJ). See an example below If only kcal is declared, then please put an * besides kcal and include the conversion factor (*1kcal = 4.2kJ) at the bottom of the NIP table. If only kJ is declared, then please put an * besides kJ and include the conversion factor (*1kJ = 0.24kcal) at the bottom of the NIP table. If both kcal and kJ are declared in the NIP table (e.g. 88 kcal(370kJ)), then you do not need to include the conversion factor at the bottom of the NIP table. Please note that for kcal, all letters are in lower case. For kJ, k is in lowercase and J is in uppercase. 		
19	Nutrient values for Energy, Cholesterol and Sodium are rounded off to the nearest whole number.		
20	Nutrient values for Protein, Total Fat, Saturated Fat, Carbohydrates, Sugar, Dietary Fibre are rounded off to the nearest one decimal place		
21	 If a nutrient claim, nutrient function claim or health claim is made: 1) Are they permitted or approved claims as stated in the Handbook on Nutrition Labelling and/or in SFA's A Guide to Food Labelling and Advertisements? 2) Is the nutrient declared in the NIP? 		

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

For items marked "no", please revise your packaging 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 the criteria in 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.		

No.	ltem	Yes	No
	Health Claims		
10	When you want to make nutrient specific diet-related Health claims like the following:		
	"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 the criteria in 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		

Section 4: Checklist for Additional Requirements for Product Packaging 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 and product packaging comply with Singapore Food Regulations, SFA's A Guide to Food Labelling and Advertisements and HPB's A Handbook on Nutrition Labelling (Singapore).		
	Does the text/paragraph on the product packaging 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		
2	(a) Claims for therapeutic or prophylactic action or words of similar meaning, unless specifically permitted by these Regulations,		
2	(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.		
3	The product packaging does not contain information that is false, misleading, deceptive or is likely to create an erroneous impression of the food		
4	The claims and information used on the product packaging are factual, accurate and not misleading. Evidence such as scientific reports or statistical reports are required for support of statements or claims.		
5	The product packaging does not portray any conception of the product being 'good' or 'bad', 'healthy' or 'unhealthy'.		
	The product packaging does not contain the following statements or statements bearing similar meaning:		
6	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'		
7	The product packaging 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)		
8	The product packaging includes "Eat All Foods in Moderation" statement.		