

# **LABELLING AND ADVERTISING REQUIREMENTS FOR NUTRI-GRADE BEVERAGES SOLD IN SINGAPORE**

GUIDANCE DOCUMENT  
HEALTH PROMOTION BOARD

## **Disclaimer**

The contents of this document serve as a general guide to the labelling and advertising requirements for Nutri-Grade beverages intended for sale by retail in Singapore. This is not a comprehensive guide. All illustrations are for reference purposes only and not drawn to scale.

This document does not provide legal advice and is not to be relied upon as a source of legal advice. Should you have any queries, it is recommended that you refer to the [Food Regulations](#)<sup>1</sup> for the complete set of requirements and/or seek independent legal advice.

If there are any discrepancies between the different language versions of this document, the English version shall be taken as correct.

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<sup>1</sup> <https://www.sfa.gov.sg/legislation>

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## Section 1: Introduction

### Background and summary of measures

1. From 30 December 2022, Nutri-Grade beverages sold in Singapore in prepacked form and from automatic beverage dispensers will be subject to new labelling requirements and advertising prohibitions in the Food Regulations as amended by the Food (Amendment No. 2) Regulations published on 30 December 2021 (“**Amendment Regulations**”). The decision was made after carefully considering the feedback received from public, industry and expert stakeholders, and reviewing existing overseas and local evidence. The Amendment Regulations will take effect from 30 December 2022.
2. The objectives and key features of the Amendment Regulations are as follows:
  - a) Labelling scheme (“Nutri-Grade”): The Nutri-Grade mark aims to help consumers identify beverages that are higher in sugar and saturated fat and make more informed, healthier choices. It also aims to spur the industry to reformulate their beverage products.

The Nutri-Grade mark has four colour-coded grades, from Grade A (corresponding to the lowest sugar and saturated fat thresholds) to Grade D (corresponding to the highest sugar and saturated fat thresholds). Nutri-Grade beverages are to be graded “A”, “B”, “C” or “D” according to the Nutri-Grade grading system. Nutri-Grade beverages graded “C” or “D” must be labelled with a Nutri-Grade mark on the front-of-pack of the package. If the Nutri-Grade beverage is sold by retail online, from a vending machine (in prepacked form) or a purchaser-facing automated beverage dispenser (as defined in the *Food Regulations*, Regulation 184E(4)), the image of the Nutri-Grade mark must be displayed so a prospective purchaser may see the image. Labelling of the Nutri-Grade mark is optional for Nutri-Grade beverages graded “A” or “B”.
  - b) Advertising prohibition: The advertising prohibition aims to reduce the influence of advertisements on consumer preferences.

Advertisements related to Nutri-Grade beverages graded “D” are prohibited, except in certain circumstances detailed in Regulation 184F(2). Advertisements of Nutri-Grade beverages graded “D” at POS will have to display an image of the Nutri-Grade mark.
  - c) Nutrition Information Panel (NIP): To implement the Nutri-Grade labelling scheme and advertising prohibition, all Nutri-Grade beverages have to carry a NIP, specifying the energy value, the amount of protein, carbohydrate, fat, total sugar and saturated fat in the Nutri-Grade beverage.
3. The Amendment Regulations aim to help consumers identify beverages that are higher in sugar and saturated fat, make more informed, healthier choices, reduce the influence of advertising on consumer preferences, and spur industry reformulation. They will complement MOH’s and Health Promotion Board (HPB)’s current promotional and educational efforts to shift the market towards healthier

product offerings, as part of a sustainable approach to reshape consumer behaviour and choices.

#### Purpose of document

4. This document is intended to serve as a general guide to the labelling and advertising requirements for Nutri-Grade beverages, to assist industry stakeholders to comply with the requirements of the *Food Regulations* when the Amendment Regulations come into force.
5. This document should be read in conjunction with the following materials:
  - a) [Specifications of the Nutri-Grade mark<sup>2</sup>](#), which provides mandatory specifications for the Nutri-Grade mark, referred to in the *Food Regulations*, Regulation 184D(5).
  - b) [Usage Guide for Graphic Applications of the Nutri-Grade mark<sup>3</sup>](#), which provides guidelines on graphic applications of the Nutri-Grade mark.

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<sup>2</sup> The document is available under the “Resources” section of HPB’s website, at <https://www.hpb.gov.sg/healthy-living/food-beverage/nutri-grade>.

<sup>3</sup> The document is available under the “Resources” section of HPB’s website, at <https://www.hpb.gov.sg/healthy-living/food-beverage/nutri-grade>.

## Section 2: Scope of products subject to the Amendment Regulations

6. The Amendment Regulations will apply to Nutri-Grade beverages that are intended for sale by retail in Singapore. A “Nutri-Grade beverage” is defined in the *Food Regulations*, Regulations 2(1) and 184A(1), and includes the following unless it fits the description within Regulation 184A, as explained in Paragraph 8:
  - a) Prepacked beverages that are ready-to-consume and are packed or made up in advance to be ready for sale in packages such as bottles, cans, cartons, packets or other similar containers;
  - b) Prepacked beverages that are powders or concentrates that are meant to be reconstituted or diluted with fluids before consumption as a beverage; and
  - c) Beverages dispensed from automated beverage dispensers, which are machines that dispense non-prepacked beverages according to a pre-fixed formula, with no option for a prospective purchaser of the beverage to customise the amount of any ingredient in the beverage. This includes fountain drinks and beverages dispensed from automated coffee machines.
7. Beverages are any substance that are intended for sale as a beverage for human consumption, either without or after reconstitution or dilution.

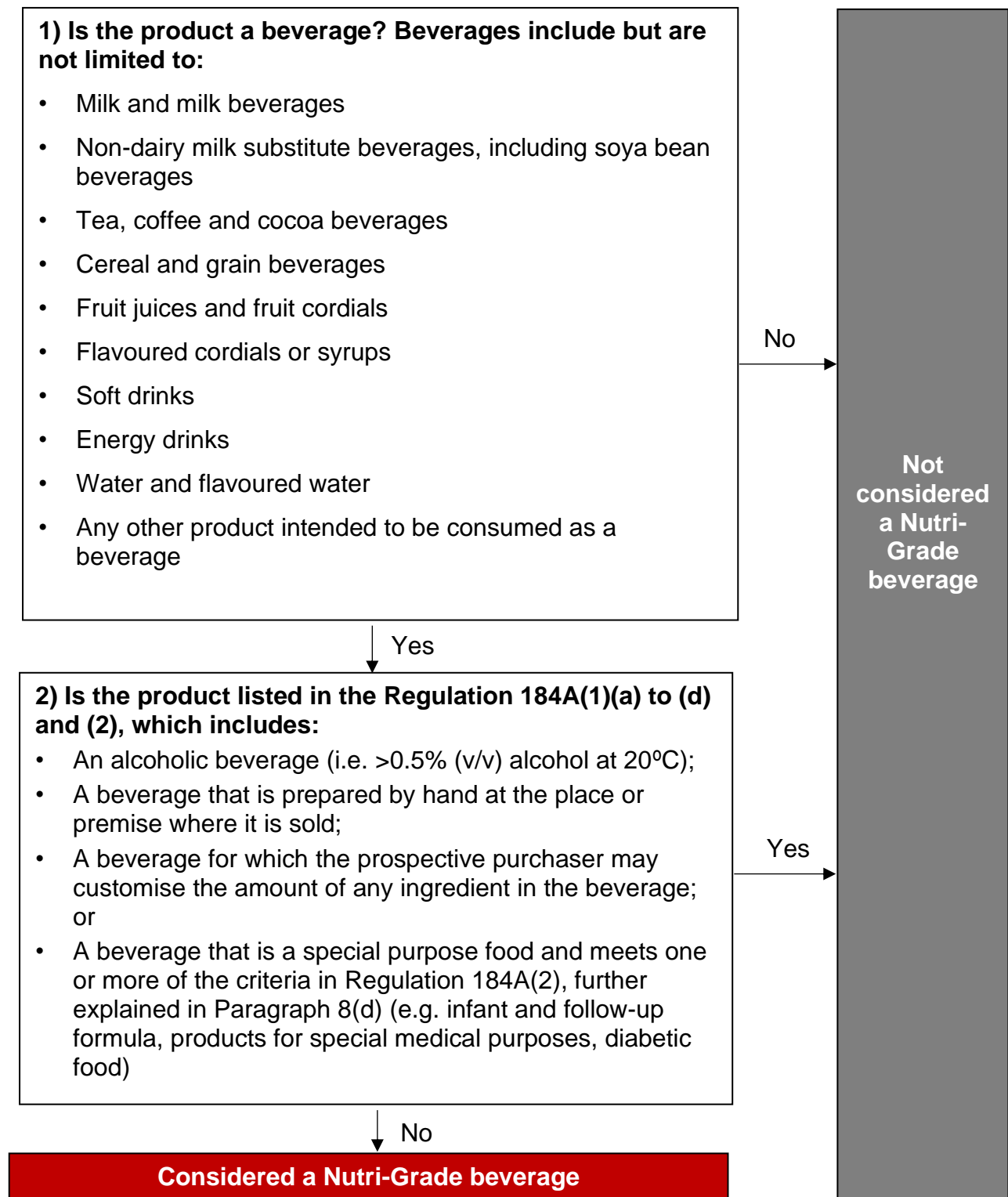


8. The following products are not Nutri-Grade beverages<sup>4</sup>:
- a) Beverages that contain more than 0.5% (v/v) alcohol at 20°C (for the avoidance of doubt, alcohol replacement drinks such as de-alcoholised beer or wine with ≤0.5% (v/v) alcohol at 20°C do not fall under this sub-paragraph);
  - b) Beverages that are prepared by hand at the place or premises where they are sold;
  - c) Beverages for which a prospective purchaser may customise the amount of any ingredient in the beverages;
  - d) Special purpose foods which meet at least one of the following criteria, as specified in the *Food Regulations*, Regulation 184A(2):
    - i. for a special medical purpose and that is labelled as being for use under medical supervision;
    - ii. supplied solely to hospitals, hospices and other residential care facilities like nursing homes for the purpose of providing services to patients in those facilities;
    - iii. that is infant formula;
    - iv. that is follow-up formula, that is, food intended for use as a liquid part of the weaning for an infant 6 months or older or young children (i.e. young children is defined as persons from the age of more than 12 months up to the age of three years (36 months));
    - v. that is formula food for use in a weight control diet, that is, formula food presented as a replacement for a person's total daily diet;
    - vi. that is diabetic food; or
    - vii. for a person who requires a specific intake of sugar (including but not limited to sucrose) or saturated fat in the person's diet as a result of a disease, disorder or other condition.
9. Industry should note that the Amendment Regulations do not cover products excluded from the definition of "food" in Section 2A(3) of the Sale of Food Act (for example, health products within the meaning of the Health Products Act).
10. The flow chart in Figure 1 may be used to determine if a product is considered a "Nutri-Grade beverage".

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<sup>4</sup> These include products listed in the *Food Regulations*, Regulations 184A(1) and (2)

Figure 1: Flow chart to determine if a product is considered a “Nutri-Grade beverage”





## Frequently Asked Questions

### A. Which products are considered Nutri-Grade beverages?

Table 2 contains a few commonly queried products and whether they fall under the scope of Nutri-Grade beverages. Please note that this is intended to be a general guide based on the most commonly found products currently in the market, and is not an exhaustive list. For guidance on specific products, please contact HPB (Nutri-Grade@hpb.gov.sg).

Table 2: Commonly queried products and classifications

Category	Sub-category/ Examples	Whether products are considered Nutri-Grade beverages (Yes/No; reasons)
Juices and juice drinks (including cordials or concentrates)	<ul style="list-style-type: none"> <li>• 100% juices</li> <li>• Juice concentrate</li> </ul>	Yes; <ul style="list-style-type: none"> <li>• Intended for consumption as a beverage</li> </ul>
Soft drinks	<ul style="list-style-type: none"> <li>• Cola-flavoured drinks</li> <li>• Fruit-flavoured soda drinks</li> </ul>	Yes; <ul style="list-style-type: none"> <li>• Intended for consumption as a beverage</li> </ul>
Isotonic and energy drinks	<ul style="list-style-type: none"> <li>• Isotonic drinks, in both liquid and powdered form (i.e. requiring reconstitution before consumption)</li> </ul>	Yes; <ul style="list-style-type: none"> <li>• Intended for consumption as a beverage</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Plain drinking water</li> <li>• Flavoured water</li> <li>• Sparkling water</li> </ul>	Yes; <ul style="list-style-type: none"> <li>• Intended for consumption as a beverage</li> </ul>
Asian drinks	<ul style="list-style-type: none"> <li>• Chrysanthemum tea</li> <li>• Barley</li> </ul>	Yes; <ul style="list-style-type: none"> <li>• Intended for consumption as a beverage</li> </ul>
Dairy products and non-dairy substitutes	<ul style="list-style-type: none"> <li>• Milk (full-fat, low-fat, non-fat), in both liquid and powdered form (i.e. requiring reconstitution before consumption)</li> <li>• Soya bean milk</li> </ul>	Yes; <ul style="list-style-type: none"> <li>• Intended for consumption as a beverage (e.g. marketed as a beverage, sold as part of a set meal)</li> </ul>

	<ul style="list-style-type: none"> <li>Nut milks and other non-dairy milk substitutes (e.g. almond milk, rice milks)</li> <li>Cultured milk beverage and yoghurt beverage</li> </ul>	
	<ul style="list-style-type: none"> <li>Evaporated milk</li> <li>Sweetened condensed milk</li> <li>Butter</li> <li>Cream</li> <li>Cheese</li> <li>Yoghurt</li> <li>Whey</li> <li>Ghee/ ghi</li> </ul>	<p>No;</p> <ul style="list-style-type: none"> <li>Not intended for consumption as a beverage</li> </ul>
Tea, coffee, cocoa and similar products	<ul style="list-style-type: none"> <li>Instant or soluble coffee or tea (i.e. requiring reconstitution before consumption)</li> <li>Ready-to-consume coffee or tea</li> <li>Tea bags</li> <li>Tea leaves, which are intended for sale and consumption as a beverage after brewing with water</li> <li>Coffee grounds, which are intended for sale and consumption as a beverage after brewing with water (e.g. kopi-o-kosong coffee bags, capsules that contain coffee grounds and are intended to be used with coffee machines)</li> <li>Herbal infusions</li> <li>Cocoa beverages</li> </ul>	<p>Yes;</p> <ul style="list-style-type: none"> <li>Intended for consumption as a beverage</li> </ul>
	<ul style="list-style-type: none"> <li>Coffee beans/grounds and tea (e.g. leaves and leaf-buds), which are intended for sale and</li> </ul>	<p>No;</p> <ul style="list-style-type: none"> <li>Not intended for consumption as a beverage</li> </ul>

	<p>usage as a raw ingredient in cooking, baking or other purposes (e.g. sold in gunny sacks for general use)</p> <ul style="list-style-type: none"> <li>• Cocoa beans, cocoa nibs, cocoa paste, cocoa mass, cocoa slab, cocoa powder, cocoa essence</li> </ul>	
Cereal products	<ul style="list-style-type: none"> <li>• Instant cereal beverages (i.e. requiring reconstitution before consumption)</li> <li>• Ready-to-consume cereal beverages</li> </ul>	<p>Yes;</p> <ul style="list-style-type: none"> <li>• Intended for consumption as a beverage</li> </ul>
	<ul style="list-style-type: none"> <li>• Breakfast cereal, oats, muesli etc.</li> <li>• Cereal bars</li> </ul>	<p>No;</p> <ul style="list-style-type: none"> <li>• Not intended for consumption as a beverage</li> </ul>
Forms of sugar/sweetener	<ul style="list-style-type: none"> <li>• All types of sugar (white, brown, rock, icing etc.)</li> <li>• Honey</li> <li>• Molasses</li> <li>• Glucose syrup</li> </ul>	<p>No;</p> <ul style="list-style-type: none"> <li>• Not intended for consumption as a beverage - these are ingredients</li> </ul>
Meat essences	<ul style="list-style-type: none"> <li>• Chicken essence</li> <li>• Fish essence</li> </ul>	<p>No;</p> <ul style="list-style-type: none"> <li>• Not intended for consumption as a beverage, similar to broths or soups</li> </ul>
Bird's nest products	<ul style="list-style-type: none"> <li>• Liquid bird's nest drink that is intended for sale and consumption as a beverage (including concentrates)</li> </ul>	<p>Yes;</p> <ul style="list-style-type: none"> <li>• Intended for consumption as a beverage</li> </ul>
	<ul style="list-style-type: none"> <li>• Solid bird's nest</li> </ul>	<p>No;</p> <ul style="list-style-type: none"> <li>• Not intended for consumption as a beverage</li> </ul>
Beverages that can be used as meal replacement	<ul style="list-style-type: none"> <li>• Partial meal replacement (e.g. nutritional shakes)</li> </ul>	<p>Yes;</p> <ul style="list-style-type: none"> <li>• Not covered under the exclusion stated in Paragraph 8(d) and thus</li> </ul>

		are Nutri-Grade beverages
	<ul style="list-style-type: none"> <li>Total daily meal replacement (e.g. those for post-surgery use)</li> </ul>	No; <ul style="list-style-type: none"> <li>Covered under the exclusion stated in Paragraph 8(d) and thus not a Nutri-Grade beverage</li> </ul>

**B. What does Paragraph 8(b) mean when it says “Beverages that are prepared by hand at the place or premises where they are sold” are not considered Nutri-Grade beverages?**

- Currently, Nutri-Grade beverages do not include beverages that are prepared and sold in the same premises. Regulatory requirements for these beverages may be released at a later date. Examples of such beverages are:
  - Freshly prepared drinks made in the premise of a F&B establishment, such as a restaurant, food court, café or kiosk, for immediate consumption including:
    - Those prepared and portioned in advance of sale for operational expediency (e.g. barley or ice lemon tea made onsite and poured into individual cups and sealed ahead of sale); and
    - Those prepared at a central F&B establishment and distributed to other establishments for sale by the same food business operator for operational expediency (e.g. herbal drinks formulated for consumption as recreational beverages prepared at a central herbal drink establishment and distributed for sale at other retail outlets);
  - Freshly prepared drinks made in the premise of a F&B establishment and packaged to be taken away by or delivered to the consumer (e.g. bubble tea, coffee/tea, soya milk);
  - Freshly prepared drinks made in the home of home-based businesses (e.g. kombucha);
  - Freshly prepared drinks that are prepared using powders/concentrates and served to consumers at the F&B establishment after reconstitution (e.g. hot coffee made using 3-in-1 powder);
    - However, do note that the powder/concentrate itself (e.g. 3-in-1 powder) is prepacked and subject to the Amendment Regulations, if it is intended for sale by retail in Singapore.
  - Freshly prepared drinks made by an automatic beverage dispenser that allows for customisation (e.g. a coffee/tea machine that allows a prospective purchaser to select the amount of sugar or creamer used)

- Drinks that are portioned out at the F&B establishment, from a retail packaging (e.g. canned drink supplied in retail packaging to the F&B establishment, and which is portioned into individual cups onsite);
  - However, the drink supplied in retail packaging (e.g. canned soft drinks) is prepacked and subject to the Amendment Regulations, if it is intended for sale by retail in Singapore.
- Drinks that are portioned out at the F&B establishment, from a bulk packaging (e.g. soymilk supplied in bulk packaging to the F&B establishment, and which is portioned into individual bottles onsite).
  - The Amendment Regulations do not apply to the bulk packaging itself, if it is not intended for sale by retail in Singapore (e.g. B2B only).

**C. Which products qualify as “follow-up formula”, for the purpose of the explanation within Paragraph 8(d)(iv), and can be exempt from being considered a “Nutri-Grade beverage”?**

- Follow-up formula is food intended for use as a liquid part of the weaning for an infant 6 months or older or young children (i.e. persons from the age of more than 12 months up to the age of three years (36 months)).
- For example, a product that is intended for consumption by children between the ages of 12 to 36 months, would not be considered a “Nutri-Grade beverage”.
- However, a product that is intended for consumption by children beyond 36 months would not be considered a “follow-up formula” and thus would be considered a “Nutri-Grade beverage” [assuming it does not fulfil any of the other criteria within Regulation 184A, explained in Paragraph 8(d)]. This includes:
  - A product intended for consumption by children above 12 months (without an upper age limit)<sup>5</sup>; and
  - A product intended for consumption by children between the ages of 1 to 10 years.

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<sup>5</sup> Follow-up formula for infants from the 6<sup>th</sup> month or older would still be regarded as infant formula under Regulation 252 of the Food Regulations.

## Section 3: Summary of Labelling and Advertising Requirements

11. Nutri-Grade beverages that are intended for sale by retail in Singapore must comply with the requirements in Table 3, based on their grade according to the grading system specified in Section 5.

**Table 3: Summary of requirements for Nutri-Grade beverages**

Grade	A	B	C	D
Requirements	Mandatory labelling of Nutrition Information Panel			
	Voluntary labelling of Nutri-Grade mark		Mandatory labelling of Nutri-Grade mark	
				Subject to advertising prohibition

## Section 4: Nutrition Information Panel (NIP)

12. All Nutri-Grade beverages intended for sale by retail in Singapore (see Section 2), regardless of grade, must be labelled with a NIP, except for those stated in the *Food Regulations*, Regulation 184C(6) (further explained in Paragraph 13). The NIP labelling requirements are stated in Regulation 184C, which states that:

- a) For prepacked Nutri-Grade beverages, the package of the Nutri-Grade beverage must be labelled with a NIP;
- b) For Nutri-Grade beverages sold by retail from an automated beverage dispenser, the information required in a NIP must be made available to any person who wishes to view the information, in the form described in Regulation 184C(5) (further explained in Paragraphs 18-19).

13. Nutri-Grade beverages listed in the *Food Regulations*, Regulation 184C(6) do not need to be labelled with a NIP. These are the following, if they do not contain any calories, protein, fat, saturated fat, carbohydrate and sugar:

- a) Coffee or a preparation of coffee;
- b) Drinking water;
- c) A herbal infusion;
- d) Tea or a preparation of tea.

## Section 4.1 Placement of the NIP

### ***Beverage products in individual package (e.g. bottle, can, packet, sachet)***

14. The NIP must be marked on or securely attached in a prominent and conspicuous position to the beverage package and shall be clearly legible. This may be achieved by means of adhesive sticker labels.
- a) By “securely attached”, it is recommended that the label containing the NIP should not be easily removable and is likely to remain attached to the package during the expected shelf-life of the package.
  - b) To remain clearly legible, it is recommended that the NIP should be water-resistant and the ink should not run when condensation/spillage occurs.
15. The NIP may be placed on any surface of the beverage package. It is recommended that it be placed with or in close proximity to the ingredients list.

### ***Beverage products in multipacks***

16. A multipack is a pack of several individual prepacked units of beverages, which are grouped and packaged for sale as a single item. Within multipacks, the individual units of beverages are usually grouped and packaged together within an outer packaging such as a plastic sleeve wrapper or a cardboard pack or box.
17. The NIP labelling requirements for multipacks are stated in the *Food Regulations, Regulation 184C(3)*. For multipacks, the NIP may be marked on or securely attached to either:
- a) The package of each unit of the prepacked Nutri-Grade beverage in the multipack, and not the outer packaging of the multipack; or
  - b) The outer packaging of the multipack and not the packaging of the units of the prepacked Nutri-Grade beverage, if the outer packaging of the multipack includes a statement that each unit in the package must not be sold separately or a statement to the like effect (e.g. “Not to be sold separately”).

Industry may also mark or securely attach the NIP on both the package of each individual unit of beverage and the outer packaging of the multipack, to fulfil Regulation 184C(3).

### ***Beverage products dispensed from an automated beverage dispenser***

18. The NIP labelling requirements for beverages sold from an automated beverage dispenser are stated in the *Food Regulations, Regulations 184C(4) and 184C(5)*. For beverages that are sold by retail from an automated beverage dispenser, the nutrition information that would have been required in an NIP must be available to any person who wishes to view the information.
19. The nutrition information can be made available in either of the following forms:
- a) Clearly displayed on, or near to, the automated beverage dispenser (e.g. standee on display near the dispenser);



- b) On a website or other electronic record that is viewable by the person (e.g. accessed electronically via a QR code); or
- c) On a physical document that is shown or given to the person on the person's request (e.g. information sheet given upon request).

## Section 4.2 Required information and format of the NIP

### **General requirements for the NIP**

20. The NIP must be in the form specified in the Twelfth Schedule or in any other similar form that may be acceptable to the Director-General.
21. The text of the NIP must be clearly and legibly printed in English. It can appear alongside other languages.
22. **Mandatory declaration:** Subject to Regulation 184C(1), explained in Paragraph 38, the NIP must specify the energy value, and the amounts of the following nutrients (henceforth termed "mandatory nutrients"):
- a) Protein;
  - b) Carbohydrate;
  - c) Total sugar<sup>6</sup>;
  - d) Fat;
  - e) Saturated fat<sup>7</sup>; and
  - f) Any other nutrients for which a nutrition claim is made in respect of the beverage.
23. **Supplementary declaration:** In addition to the mandatory nutrients, the amount of other nutrients may be specified on the NIP on a voluntary basis (henceforth termed "supplementary nutrients"). These may include:
- a) Monounsaturated fat, polyunsaturated fat, omega fatty acids and trans fat, which may be inserted as sub-groups of fat after saturated fat;
  - b) Added sugar, **lactose** and **galactose**, which may be inserted as sub-groups of total sugar;
- (Note: Declaration of lactose and galactose is strongly encouraged for beverages which contain these nutrients. Please refer to Paragraph 41(a) for further explanation regarding the relevance of declaring lactose and galactose, in relation to the Nutri-Grade grading system and mark)
- c) Dietary fibre;
  - d) Sodium; and

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<sup>6</sup> If there is no carbohydrate in the product, it is not mandatory to declare the amount of "total sugar" (see *Food Regulations*, Regulation 184C(1)(c)).

<sup>7</sup> If there is no fat in the product, it is not mandatory to declare the amount of "saturated fat" (see *Food Regulations*, Regulation 184C(1)(d)).



- e) Other nutrients as specified in HPB's "Handbook on Nutrition Labelling (Singapore)".
24. The appropriate metric units should be used. The unit for energy is kilocalories and/or kilojoules. The unit for all the mandatory nutrients is in grams. Please refer to HPB's "Handbook on Nutrition Labelling (Singapore)" for the appropriate units for the supplementary nutrients.
25. The energy value and amounts of nutrients should be specified in terms of 'per 100 ml' and/or 'per serving'. If 'per serving' is used, the serving size (in ml) and number of servings per package must also be clearly stated on the NIP.
26. Values for energy are to be rounded off to the nearest whole number, while the values for the mandatory nutrients are to be rounded off to the nearest one decimal place.

***Requirements for powders or concentrates meant to be reconstituted or diluted with fluids before consumption as a beverage***

27. For these products, the NIP must (in addition to complying with Regulations 184C(1), 184C(4) and 184C(5), explained in Paragraphs 20 to 26):
- a) Specify the energy value and amounts of nutrients on the basis that the beverage is prepared according to the manufacturer's instructions on how to prepare the beverage, in terms of 'per 100 ml' and/or 'per serving'; and
  - b) If the information is expressed 'as grams 'per 100 ml' of the beverage, state that the information is on the basis that the beverage is prepared according to those instructions (e.g. "As reconstituted according to label directions").
28. For these products, their package must also be labelled with the manufacturer's instructions on how to prepare the beverage.
29. In specifying the values in the beverage as prepared [see Paragraph 27(b)],
- a) The final volume of the reconstituted beverage should be taken into consideration, after dilution with fluids according to the manufacturer's instructions on how to prepare the beverage.
  - b) If the manufacturer's instructions on how to prepare the beverage consist of more than one reconstitution instruction (e.g. a powder can be diluted with water or with milk), it is recommended that dilution with water is used for the purpose of calculating the beverage's grade. It is recommended that the Nutri-Grade grading and nutrition information on its packaging should be based on reconstitution with water, and the NIP should indicate that the declared information on the NIP are based on water as the method of reconstitution. Please refer to the Worked Examples for more information.
  - c) If the reconstitution instruction calls for dilution with a specific type of milk (e.g. full-fat, low-fat or skimmed plain milk), the nutritional content of the milk must be included. A reasonable basis should be used to determine the nutritional content of the milk. For example, the HPB's Food Composition System Singapore (FOCOS) may be used to obtain the respective nutrient values for

each type of milk. For reference, the nutrient values of commonly used milks for reconstitution are as follows (as of June 2021):

- i. Skimmed plain milk: 34.0 kcal, 3.60 g of protein, 4.80 g of carbohydrate/total sugar/lactose, 0.1 g of total fat and 0.1 g of saturated fat per 100 ml
  - ii. Low-fat plain milk: 49.0 kcal, 3.90 g of protein, 5.90 g of carbohydrate/ total sugar/lactose, 1.20 g of total fat and 0.75 g of saturated fat per 100 ml
  - iii. Full-fat plain milk: 64.0 kcal, 3.20 g of protein, 4.50 g of carbohydrate/total sugar/ lactose, 3.70 g of total fat and 2.25 g of saturated fat per 100 ml
- d) If the reconstitution instruction calls for dilution with milk and the type of milk is not indicated, full-fat milk will be considered the default.
- e) If the reconstitution instruction calls for dilution with a substance other than water or milk, the same principles apply and the nutritional content of the substance must be included. A reasonable basis should be used to determine the nutritional content of the substance.

30. In addition to the mandatory requirements within Regulations 8A and 184C(2), further explained in Paragraphs 27 and 28, the NIP may also specify the energy value and amounts of nutrients in the product as sold. This may be in terms of 'per 100 g' or 'per 100 ml' (100 g shall be used if the product is sold in solid form, whereas 100 ml shall be used if the product is sold in liquid form), and/or per serving.

### **Form for the NIP**

31. The text of the NIP shall be in printed letters not less than 1.5 mm in height.

32. Please see Figure 2 for the standard form for the NIP for Nutri-Grade beverages. For manufacturers, local importers, distributors or retailers who wish to declare supplementary nutrients on the NIP, please refer to HPB's "A Handbook on Nutrition Labelling (Singapore)" for more information on the form and order of presentation of the supplementary nutrients.

**Figure 2: Standard form for the NIP**

<b>NUTRITION INFORMATION</b>		
Servings per package (here insert number of servings) *		
Serving size: (here insert the serving size) *		
	Per Serving* and/or	Per 100 ml***
Energy	kcal, kJ or both	kcal, kJ or both
Protein	g	g
Fat	g	g
Saturated Fat	g	g
Carbohydrate	g	g
Total Sugar	g	g
Lactose**	g	g

Galactose**	g	g
(here insert the nutrients for which nutrition claims are made, or any other nutrients to be declared)	mcg, mg, g or other units of measurement as appropriate	mcg, mg, g or other units of measurement as appropriate

\*Applicable only if the nutrients are declared on a per serving basis

\*\*Optional but strongly encouraged for beverages containing lactose/ galactose

\*\*\*For powders or concentrates meant to be reconstituted or diluted with fluids before consumption, if the NIP states energy value and amounts of nutrients per 100 ml of the beverage, there shall also be a statement on the NIP that the values under this column is based on the beverage when prepared according to the manufacturer's instructions on how to prepare the beverage (e.g. "As reconstituted according to label directions"). Supplementary information on the energy value and amounts of nutrients in the product as sold may be added.

33. Prepacked beverages with a total surface area of less than 100cm<sup>2</sup> and a label that includes a statement of the quantity of total sugar and saturated fat, need not have a NIP. However, if relevant parties (i.e., manufacturers, local importers, distributors mentioned in Regulation 184B(1)) would like to label such a beverage with the information in a NIP but the package is unable to accommodate a NIP, it may consider presenting the information as shown in Figure 3).

Figure 3: Presenting NIP information for products with a total surface area of less than 100cm<sup>2</sup>

**NUTRITION INFORMATION.** Servings per package: (here insert number of servings)\*, Serving size: (here insert the serving size)\*  
Amount per serving and/or per 100ml\*\*\*: Energy *kcal or kJ or both*, Protein *g*, Fat *g*, Saturated Fat *g*, Carbohydrate *g*, Total Sugar *g*, Lactose\*\* *g*, Galactose\*\* *g*, (here insert the nutrients for which nutrition claims are made, or any other nutrients to be declared).

\*Applicable only if the nutrients are declared on a per serving basis

\*\*Optional but strongly encouraged for beverages containing lactose/ galactose

\*\*\*For powders or concentrates meant to be reconstituted or diluted with fluids before consumption, if the NIP states energy value and amounts of nutrients per 100 ml of the beverage, there shall also be a statement on the NIP that the values under this column is based on the beverage when prepared according to the manufacturer's instructions on how to prepare the beverage (e.g. "As reconstituted according to label directions"). Supplementary information on the energy value and amounts of nutrients in the product as sold may be added.

### Section 4.3: Methods of analysis and compliance requirements

34. The declared values on the NIP may be average values, meaning the value which best represents the energy value and amounts of nutrients in a given beverage and reflects allowances for seasonal variability, patterns of consumption and other factors which may cause the actual value to vary.

35. The values on the NIP may be determined based on the methods listed below. Audit checks will be conducted by collecting samples to monitor the accuracy of the information on the NIP, regardless of the method used to determine the values on the NIP. Please refer to Paragraph 39 for more information.

- a) Chemical analysis of the beverage using official methods of the Association of Official Analytical Chemists (AOAC) and/or alternative methods shown to be equivalent to AOAC official methods<sup>8</sup>, which is the recommended method of analysis;
  - b) Calculations from the known or actual values of the ingredients used; or
  - c) Calculations from generally established and accepted data.
36. For powders or concentrates meant to be reconstituted or diluted with fluids before consumption, the NIP should specify the energy value and amounts of nutrients based on the beverage as prepared according to the manufacturer's instructions on how to prepare the beverage. This should take into account the final volume of the beverage, after reconstitution of the powder/concentrate. There are several methods to determine these values:
- a) Chemical analysis of the reconstituted beverage; or
  - b) Calculation using known values of the powder or concentrate as sold, to derive the values for the beverage as prepared. The FAO/INFOODS Density Database may be used to obtain density values of common products. Alternatively, it can be taken that the addition of 1 g of product would result in 1 ml increase in volume of reconstituted beverage.
37. The tolerance levels for nutrient declarations are as follows:
- a) The actual energy value, and amounts of fat, saturated fat, carbohydrate, total sugar (and trans fat, cholesterol and sodium, if declared), as determined by the authorities via nutrient analysis, shall not be more than 20% in excess of the values declared on the NIP;
  - b) The actual amounts of naturally occurring nutrients, as determined by the authorities via nutrient analysis, shall not be less than 80% of the values declared on the NIP;
  - c) The actual amounts of added vitamins, minerals and protein, as determined by the authorities via nutrient analysis, shall be at least equal to that declared on the NIP.

Reasonable deficiencies in the energy value, and amounts of fat, saturated fat, carbohydrate, total sugar (and trans fat, cholesterol, and sodium, if declared) under declared amounts are accepted within current good manufacturing practices. Reasonable excesses of protein (and vitamins, minerals, fibre, polyunsaturated fat, monounsaturated fat) over declared amounts are acceptable within current good manufacturing practices.

38. For the requirements set out in Regulation 184C, very low amounts of fat, saturated fat, carbohydrate, total sugar, and protein may be declared in the NIP as described in Table 4.

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<sup>8</sup> A list of laboratories accredited under the Singapore Accreditation Council's Singapore Laboratory Accreditation Scheme (SAC-SINGLAS) can be found at: <http://www.sac-accreditation.gov.sg>. For overseas accredited laboratories, please refer to SAC's Mutual Recognition Arrangements (MRAs).

Table 4: Declaration on NIP for very low amounts of relevant nutrients

Nutrient	Amount	Declaration on NIP
Fat	<ul style="list-style-type: none"> <li>• No detectable amount is present; or</li> <li>• Concentration is <math>\leq 0.5</math> g per 100 ml</li> </ul>	<ul style="list-style-type: none"> <li>• Declared as “0 g” or “<math>\leq 0.5</math> g” on NIP</li> </ul>
Saturated fat	<ul style="list-style-type: none"> <li>• No detectable amount is present; or</li> <li>• Concentration is <math>\leq 0.5</math> g per 100 ml</li> </ul>	<ul style="list-style-type: none"> <li>• Declared as “0 g” or “<math>\leq 0.5</math> g” on NIP; or</li> <li>• A statement “Not a significant source of saturated fat...” or “Contains negligible amounts of saturated fat...” may be included, located close to the NIP</li> </ul>
	<ul style="list-style-type: none"> <li>• Amount of total fat is <math>\leq 0.5</math> g per 100 ml (i.e. declared as “0 g” or “<math>&lt; 0.5</math> g” on NIP)</li> </ul>	<ul style="list-style-type: none"> <li>• Not required to declare saturated fat on the NIP</li> <li>• A statement “Not a significant source of saturated fat...” or “Contains negligible amounts of saturated fat...” may be included, located close to the NIP</li> </ul>
Carbohydrate	<ul style="list-style-type: none"> <li>• No detectable amount is present; or</li> <li>• Concentration is <math>\leq 0.5</math> g per 100 ml</li> </ul>	<ul style="list-style-type: none"> <li>• Declared as “0 g” or “<math>\leq 0.5</math> g” on NIP</li> </ul>
Total sugar	<ul style="list-style-type: none"> <li>• No detectable amount is present; or</li> <li>• Concentration is <math>\leq 0.5</math> g per 100 ml</li> </ul>	<ul style="list-style-type: none"> <li>• Declared as “0 g” or “<math>\leq 0.5</math> g” on NIP; or</li> <li>• A statement “Not a significant source of sugar...” or “Contains negligible amounts of sugar...” may be included, located close to the NIP</li> </ul>
	<ul style="list-style-type: none"> <li>• Amount of carbohydrate is <math>\leq 0.5</math> g per 100 ml (i.e. declared as “0 g” or “<math>&lt; 0.5</math> g” on NIP)</li> </ul>	<ul style="list-style-type: none"> <li>• Not required to declare sugar on the NIP</li> <li>• A statement “Not a significant source of sugar...” or “Contains negligible amounts of sugar...” may be included, located close to the NIP</li> </ul>
Protein	<ul style="list-style-type: none"> <li>• No detectable amount is present; or</li> <li>• Concentration is <math>\leq 0.5</math> g per 100 ml</li> </ul>	<ul style="list-style-type: none"> <li>• Declared as “0 g” or “<math>\leq 0.5</math> g” on NIP</li> </ul>

39. Manufacturers, local importers and distributors, as mentioned in Regulation 184B(1), are responsible for ensuring that a beverage is labelled with a NIP, for the accuracy of the NIP information and manufacturer's instructions on how to prepare the beverage, and for making and keeping written records to support the nutrient declarations, according to the requirements set out in Regulation 184C. Audit checks will be conducted by collecting samples to monitor the accuracy of the information on the NIP. If required and upon request, the records and information to support the nutrient declaration on the NIP must be submitted. Such supporting information include:

- a) Laboratory analysis reports;
- b) Documentation of the calculations done including information from suppliers where necessary;
- c) Instructions for preparation of the beverage;
- d) Ingredient listing;
- e) Sample of the beverage.

## Frequently Asked Questions

### **A. What nutrients must be declared on the NIP?**

It is mandatory to declare the energy value and amounts of mandatory nutrients on the NIP (i.e. protein, fat, saturated fat, carbohydrate, total sugar), in compliance with Regulation 184C(1) and further elaborated in Paragraphs 22 and 38. In addition, supplementing the mandatory nutrient declaration with information on the amounts of supplementary nutrients, as listed in Paragraph 23 (e.g. lactose), is allowed on a voluntary basis.

### **B. When must supplementary nutrients be listed?**

- Supplementary nutrients are only required to be listed on the NIP if there is a nutrient claim about that nutrient (see *Food Regulations*, Regulation 8A).
- Please note that the grade and sugar percentage on the Nutri-Grade mark must be determined by the information on the NIP.
  - In order to subtract the lactose and/or galactose content in the calculation of the sugar content for their beverages for the purpose of determining the grade and sugar percentage on the Nutri-Grade mark, the amounts of these nutrients must be declared on the NIP. If the amounts of lactose and galactose are not declared on the NIP, they are taken as zero.

### **C. Does total fat include cholesterol?**

No.

### **D. Does total carbohydrate include dietary fibre?**

No.

### **E. What is the definition of "Total Sugar"?**



Total sugar, in respect of any Nutri-Grade beverage, means any monosaccharide and disaccharide in the Nutri-Grade beverage.

**F. Are ‘novel sugars’ like allulose and isomaltulose considered sugars?**

- Chemically, these novel sugars fall within the definition of a monosaccharide or disaccharide. Therefore, they are considered sugars and must count towards a Nutri-Grade beverage’s total sugar content on the NIP and for the purpose of grading.
- Nevertheless, these novel sugars could still be used as part of the reformulation and product innovation process, to reduce calorie content in food and beverages. As novel sugars are often lower in calories, Nutri-Grade beverages and other products containing novel sugars may be able to include claims on their packaging such as “Low calorie” or “Light in Energy”, provided the products meet the relevant criteria described in “A Handbook on Nutrition Labelling (Singapore)”.

**G. How many samples of each product must be analysed for nutrition labelling?**

Manufacturers, local importers, and distributors are responsible for determining the variability of their product(s) and the appropriate number of samples needed to provide accurate nutrient data.

**H. How recent must the laboratory report be?**

Manufacturers, local importers, and distributors are responsible for ensuring the laboratory reports and other supporting documents are valid and able to provide accurate nutrient data of the product being sold in the market.

**I. Who is responsible for labelling the NIP?**

- The *Food Regulations* require that the following persons ensure that the package of a Nutri-Grade beverage is labelled with the NIP and that the NIP contains accurate information. That is,
  - If a Nutri-Grade beverage is manufactured in Singapore for sale by retail in Singapore, its manufacturer;
  - If a Nutri-Grade beverage is imported for sale by retail in Singapore, its local importer; or
  - In any other case (e.g. in the event that a local distributor purchases the Nutri-Grade beverages from manufacturers or local importers, and thereafter label the product under its own brand name), its distributor.
- While the manufacturer, local importer and distributor have the legal responsibility of ensuring the accurate labelling of the NIP, they may engage a third party to do the labelling.
- To ensure that the information displayed on the NIP is accurate, the manufacturer, local importer and distributor may consider the following recommendations (this list is non-exhaustive):

- Liaising with suppliers of ingredients used in the production of the Nutri-Grade beverage to obtain the nutritional content of the ingredients so as to calculate the nutrient values to be declared on the NIP; and
- Liaising with manufacturers and local importers of Nutri-Grade beverages to obtain the necessary information, in the event that distributors purchase the Nutri-Grade beverages and thereafter label them under their own brand name.
- For beverages dispensed from automated beverage dispensers, the *Food Regulations* require that retailers ensure the nutrition information of the beverages is available to any person who wishes to view the information . To ensure that the nutrition information provided is accurate, retailers may consider liaising with the manufacturers, local importers and distributors that they acquire their supply of Nutri-Grade beverages from, or other relevant actions.



## Section 5: Nutri-Grade Grading System

### Section 5.1: Overall grading system

40. Manufacturers, local importers and distributors, according to the requirements set out in the *Food Regulations*, Regulation 184B(1), must ensure that the Nutri-Grade beverages intended for sale by retail in Singapore is graded (“A”, “B”, “C” or “D”) based on the content of sugar and saturated fat, according to the grading system shown in Table 5 below. The grade of a Nutri-Grade beverage is the lower of the following:

- a) The sugar content grade determined according to Row I in Table 5; and
- b) The saturated fat content grade determined according to Row II in Table 5.

In addition, beverages graded “A” must not contain any non-sugar substitutes<sup>9</sup>. Please see examples of the application of the grading system in Table 6.

Table 5: Summary of the Grading System underlying the Nutri-Grade

	Grade	A	B	C	D
I	<b>Sugar content (grams per 100 ml)</b>	≤1	>1 to 5	>5 to 10	>10
II	<b>Saturated fat content (grams per 100 ml)</b>	≤0.7	>0.7 to 1.2	>1.2 to 2.8	>2.8
III	<b>Use of non-sugar substitutes</b>	Must not contain any non-sugar substitutes	May contain permitted non-sugar substitutes		

Table 6: For the purpose of illustration

Example	Sugar content	Saturated fat content	Use of non-sugar substitutes	Grade on the Nutri-Grade mark
1	Within Grade B threshold	Within Grade C threshold	No	Grade C (adopt the lower of the two grades)
2	Within Grade C threshold	Within Grade B threshold	No	Grade C (adopt the lower of the two grades)
3	Met Grade A threshold	Met Grade A threshold	Yes	Grade B (Grade A must not contain non-sugar substitutes)
4	Met Grade A	Met Grade A	No	Grade A (met all

<sup>9</sup> This refers to any aspartame, sugar alcohol, carbohydrate alcohol, polyhydric alcohol, or any other substance added in place of sugar to provide a sweet taste.

	threshold	threshold		criteria for Grade A)
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41. The grade of a beverage is determined by the information on the NIP (see Section 4), when read together with the ingredient listing and manufacturer's instructions on how to prepare the beverage, labelled on the packaging. In other words -

- a) The grade based on sugar amount is determined based on the following:
- i. the grams of total sugar per 100 ml stated on the NIP, if the amount of lactose or galactose in the beverage are not stated on the NIP; or
  - ii. the grams of total sugar per 100 ml stated on the NIP, minus the grams of lactose and galactose per 100 ml, if the amount of lactose and/or galactose in the beverage are stated on the NIP.

The underlying intent is for the grade to be based on the free sugar content of the beverage, provided the lactose and/or galactose amount are stated on the NIP.

If the NIP does not state the grams of total sugar, it can be taken that the total sugar content is 0 grams per 100 ml.

- b) The grade based on saturated fat amount is determined based on the grams of saturated fat per 100 ml stated on the NIP. If the NIP does not state the grams of saturated fat, it can be taken that the saturated fat content is 0 grams per 100 ml.

### **Definitions**

**Total sugar** refers to any monosaccharide and disaccharide in the beverage. As explained in Section 4's Frequently Asked Question F, this includes novel sugars like allulose and isomaltulose.

**Free sugar** refers to any monosaccharide and disaccharide added to the beverage by its manufacturer, and those that are naturally present in fruit juices, fruit juice concentrates, honey and syrups. This excludes sugars from milk (i.e. lactose and galactose).

**Non-sugar substitute** refers to aspartame, sugar alcohol, carbohydrate alcohol, or polyhydric alcohol; or any other substance added in place of sugar to provide a sweet taste (to check what sweetening agents are permitted under the *Food Regulations*, please refer to Regulation 18 of the *Food Regulations* and the Thirteenth Schedule).

42. For ready-to-drink beverages, if the NIP states the nutrient values per serving, a simple calculation is required to obtain the grams per 100 ml (see examples in Table 7).

**Table 7: Examples of calculating nutrient values of ready-to-drink beverages declared on NIP in terms of 'per serving' to obtain values 'per 100 ml'**

<b>Example</b>	<b>Total sugar declaration on NIP</b>	<b>Lactose declaration on NIP</b>	<b>Total Sugar – Lactose (if declared)</b>	<b>Sugar value to be used for grading</b>
<b>1</b>	19 g per 250 ml	4 g per 250 ml	19 – 4 = 15 g per 250 ml	15 x (100/250) = 6 g per 100 ml
<b>2</b>	41 g per 330 ml	8 g per 330 ml	41 – 8 = 33 g per 330 ml	33 x (100/330) = 10 g per 100 ml
<b>3</b>	20 g per 500 ml	NA (not declared)	20 g per 500 ml	20 x (100/500) = 4 g per 100 ml

43. For powders/concentrates meant to be reconstituted or diluted with fluids before consumption, “100 ml” means 100 ml of the beverage as prepared, according to the manufacturer’s instructions on how to prepare the beverage, labelled on the product packaging.

- a) If the NIP states the amounts of nutrients in the beverage ‘per 100 ml’, the nutrient values on the NIP can be used directly to determine the beverage’s grade.
- b) If the NIP states the amounts of nutrients in the beverage ‘per serving’, simple calculation is required to convert the nutrient values on the NIP from the stated serving size (in ml) to ‘per 100 ml’ (see Table 7) to determine the beverage’s grade. For the purpose of calculation, it can be taken that the addition of 1 g of product results in 1 ml increase in volume of reconstituted beverage.

### Section 5.2: Rounding rules

44. The sugar content grade and saturated fat content grade are based on the respective nutrient contents of the beverage rounded to 1 decimal place for sugar content and 2 decimal places for saturated fat content, both corresponding to one additional decimal place than the grade threshold.

45. For example, the sugar threshold for Grade B is no more than 5 grams per 100 ml. The rounded value should include 1 decimal place.

- a) For a product with a value of 5.04 grams per 100 ml, the figure is rounded to 5.0 grams per 100 ml and thus its grade based on sugar content is B.

- b) For a product with a value of 5.05 grams per 100 ml, the figure is rounded to 5.1 grams per 100 ml and thus its grade based on sugar content is C.
46. In another example, the saturated fat threshold for Grade B is no more than 1.2 grams per 100 ml. The rounded value should include 2 decimal places.
- a) For a product with a value of 1.204 grams per 100 ml, the figure is rounded to 1.20 grams per 100 ml and thus its grade based on saturated fat content is B.
  - b) For a product with a value of 1.205 grams per 100 ml, the figure is rounded to 1.21 grams per 100 ml and thus its grade based on saturated fat content is C.

## Worked Examples


### Worked Example A: Clear tea drink

- Ready-to-drink in a bottle
- Ingredients: Water, Tea Extract, Sugar, Flavourings

NUTRITION INFORMATION		
Servings per package: 4		
Serving size: 200 ml		
	Per Serving	Per 100 ml
Energy	86 kcal	43 kcal
Protein	6.2 g	3.1 g
Fat	2.4 g	1.2 g
Saturated Fat	1.6 g	0.8 g
Carbohydrate	9.8 g	4.9 g
Total Sugar	9.8 g	4.9 g

Note: It is optional to declare both 'per serving' and 'per 100 ml'. The energy value and amounts of nutrients may be declared in either or both of those proportions.

### Derivation of the grade for Nutri-Grade mark


Step 1: Sugar content grade	With 4.9 g/100ml total sugar, the sugar content grade is "B".
Step 2: Saturated fat content grade	With 0.8 g/100ml saturated fat, the saturated fat content grade is "B".
Step 3: Non-sugar substitutes	Does not contain non-sugar substitutes
	<p><b>The grade is "B".</b></p>  <p>Note that sugar content is rounded to whole number as presented in the Nutri-Grade mark.</p>

### Worked Example B: Diet soft drink

- Ready-to-drink in a bottle
- Ingredients: Carbonated Water, Aspartame, Flavourings

NUTRITION INFORMATION	
	Per 100 ml
Energy	0 kcal
Protein	0 g
Fat	0 g
Carbohydrate	0 g

Note: If the fat content is 0 g, the saturated fat content need not be declared on the NIP as it is certainly 0 g as well. Similarly, if the carbohydrate content is 0 g, total sugar content need not be declared on the NIP as it is certainly 0 g as well.


Derivation of the grade for Nutri-Grade mark	
Step 1: Sugar content grade	With 0 g/100ml total sugar, the sugar content grade is "A".
Step 2: Saturated fat content grade	With 0 g/100ml saturated fat, the saturated fat content grade is "A".
Step 3: Non-sugar substitutes	Contains a permitted non-sugar substitute, and thus cannot be graded "A".
	<p><b>The grade is "B".</b></p> 

### Worked Example C1: Flavoured dairy beverage

- Ready-to-drink in a carton
- Ingredients: Low Fat Cow's Milk, Sugar, Flavourings

NUTRITION INFORMATION	
	Per 100 ml
Energy	70 kcal
Protein	2.1 g
Fat	1.5 g
Saturated Fat	1.0 g
Carbohydrate	11.0 g
Total Sugar	11.0 g
Lactose	4.0 g

#### Derivation of the grade for Nutri-Grade mark


Step 1: Sugar content grade	As lactose is declared on the NIP, the sugar content to be used for the grading is total sugar minus lactose content (i.e. $11.0\text{ g} - 4.0\text{ g} = 7.0\text{ g}$ ). The sugar content grade is "C".
Step 2: Saturated fat content grade	With 1.0 g/100ml saturated fat, the saturated fat content grade is "B".
Step 3: Non-sugar substitutes	Does not contain non-sugar substitutes
	<b>The grade is "C".</b> 

### Worked Example C2: Flavoured dairy beverage

- Ready-to-drink in a carton
- Ingredients: Low Fat Cow's Milk, Sugar, Flavourings

NUTRITION INFORMATION	
	Per 100 ml
Energy	70 kcal
Protein	2.1 g
Fat	1.5 g
Saturated Fat	1.0 g
Carbohydrate	11.0 g
Total Sugar	11.0 g

In Example C2, 'lactose' is not declared on the NIP, unlike in Example C1.

Derivation of the grade for Nutri-Grade mark	
Step 1: Sugar content grade	As lactose is not declared on the NIP, the total sugar content is used for grading. With 11.0 g/100ml total sugar, the sugar content grade is "D".
Step 2: Saturated fat content grade	With 1.0 g/100ml saturated fat, the saturated fat content grade is "B".
Step 3: Non-sugar substitutes	Does not contain non-sugar substitutes
	<p>The grade is "D".</p> 



**Worked Example D1: Instant coffee powder, with nutrient values declared per 100 ml**


- Powder that requires dilution with water before consumption (Manufacturer’s instructions labelled on the packaging are to mix 30 g of powder with 170 ml of hot water)
- Ingredients: Creamer, Coffee Powder, Malted Milk Powder, Flavourings

<b>NUTRITION INFORMATION</b>			
<b>Serving Size:</b> 30 g (1 sachet)			
<b>Servings Per Package:</b> 15			
	<b>Per 100 g</b>	<b>Per serving</b>	<b>Per 100 ml*</b>
Energy	333 kcal	100 kcal	50 kcal
Protein	6.0 g	1.8 g	0.9 g
Fat	16.7 g	5.0 g	2.5 g
Saturated Fat	14.0 g	4.2 g	2.1 g
Carbohydrate	40.0 g	12.0 g	6.0 g
Total Sugar	13.3 g	4.0 g	2.0 g
Lactose	6.7 g	2.0 g	1.0 g

Note: It is optional to declare both ‘per serving’ and ‘per 100 ml’ as prepared. Energy value and amounts of nutrients may be declared in either or both of those proportions.

It is also optional to declare ‘per 100 g’ as sold.

\*As reconstituted according to manufacturer’s instructions

<b>Derivation of the grade for Nutri-Grade mark</b>	
Step 1: Sugar content grade	As lactose is declared on the NIP, the sugar content to be used for the grading is total sugar minus lactose content (i.e. 2.0 – 1.0 = 1.0 g). The sugar content grade is “A”.
Step 2: Saturated fat content grade	With 2.1 g/100ml saturated fat, the saturated fat content grade is “C”.
Step 3: Non-sugar substitutes	Does not contain non-sugar substitutes
	<p><b>The grade is “C”.</b></p> 

### Worked Example D2: Instant coffee powder, with nutrient values declared per serving

- Powder that requires dilution with water before consumption (manufacturer's instructions labelled on the packaging are to mix 30 g of powder with 170 ml of hot water)
- Ingredients: Creamer, Coffee Powder, Malted Milk Powder, Flavourings

NUTRITION INFORMATION		
Serving Size: 30 g (1 sachet) Servings Per Package: 15		
	Per 100 g	Per serving
Energy	333 kcal	100 kcal
Protein	6.0 g	1.8 g
Fat	16.7 g	5.0 g
Saturated Fat	14.0 g	4.2 g
Carbohydrate	40.0 g	12.0 g
Total Sugar	13.3 g	4.0 g
Lactose	6.7 g	2.0 g

Note: Energy value and amounts of nutrients may be declared in terms of 'per 100 ml' and/or 'per serving'.

It is optional to declare 'per 100 g' as sold.


The nutrient values on the NIP are stated in terms of 'per serving', and need to be scaled to 'per 100 ml', in order to apply the grading system. To do so, the final volume of the reconstituted beverage should be taken into consideration, after dilution with the fluids.

For the purpose of calculation, it can be taken that addition of 1 g of product resulted in 1 ml increase in volume of reconstituted beverage.

	Per serving (30 g powder + 170 ml water, i.e. taken to be 200 ml)	Scaled down to 100 ml
Saturated Fat	4.2 g	2.1 g
Total Sugar	4.0 g	2.0 g
Lactose	2.0 g	1.0 g

X (100 ml / 200 ml)

### Derivation of the grade for Nutri-Grade mark

Step 1: Sugar content grade	As lactose is declared on the NIP, the sugar content to be used for the grading is total sugar minus lactose content (i.e. 2.0 – 1.0 = 1.0 g per 100 ml). The sugar content grade is "A".
Step 2: Saturated fat content grade	With 2.1 g/100ml saturated fat, the saturated fat content grade is "C".
Step 3: Non-sugar substitutes	Does not contain non-sugar substitutes
<b>The grade is "C".</b>	
	


**Worked Example E: Instant cereal beverage, with two options for reconstitution**

- Cereal mix that requires dilution with fluids before consumption
- However, there are 2 sets of instructions on packaging:
  - Mix 30 g of cereal mix with 170 ml of warm water; or
  - Mix 30 g of cereal mix with 170 ml of warm, whole milk
- Ingredients: Cereal, Sugar, Skimmed Milk Powder, Palm Oil, Flour, Malt Extract, Flavourings

<b>NUTRITION INFORMATION</b>		
<b>Serving Size:</b> 30 g (1 sachet)		
<b>Servings Per Package:</b> 15		
	<b>Per serving</b>	<b>Per 100 ml*</b>
Energy	100 kcal	50 kcal
Protein	2.0 g	1.0 g
Fat	2.0 g	1.0 g
Saturated Fat	1.5 g	0.8 g
Carbohydrate	18.5 g	9.3 g
Total Sugar	10.0 g	5.0 g
Lactose	4.0 g	2.0 g

The NIP should indicate that the values are based on reconstitution with water. Please see Paragraph 29(b).

\*As reconstituted with water

<b>Derivation of the grade for Nutri-Grade mark</b>	
Step 1: Sugar content grade	As lactose is declared on the NIP, the sugar content to be used for the grading is total sugar minus lactose content (i.e. 5.0 – 2.0 = 3.0 g). The grade based on sugar content is “B”.
Step 2: Saturated fat content grade	With 0.8 g/100ml saturated fat, the grade based on saturated fat content is “B”.
Step 3: Non-sugar substitutes	Does not contain non-sugar substitutes
	<p><b>The final grade is “B”.</b></p> 

### Worked Example F: Instant cereal beverage, intended to be reconstituted with milk

- Cereal mix that requires dilution with milk before consumption (manufacturer's instructions labelled on the packaging are to mix 30 g of cereal mix with 170 ml of milk)
- Ingredients: Cereal, Sugar, Skimmed Milk Powder, Palm Oil, Flour, Malt Extract, Flavourings

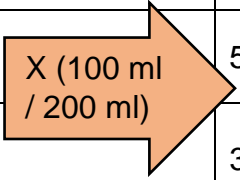
<b>NUTRITION INFORMATION</b>		
<b>Serving Size:</b> 30 g (1 sachet)		
<b>Servings Per Package:</b> 15		
	<b>Per serving</b>	<b>Per 100 ml*</b>
Energy	100 kcal	104 kcal
Protein	2.0 g	3.7 g
Fat	2.0 g	4.1 g
Saturated Fat	1.5 g	2.7 g
Carbohydrate	18.5 g	13.0 g
Total Sugar	10.0 g	8.8 g
Lactose	4.0 g	5.8 g

\*As reconstituted according to manufacturer's instructions

#### Guidance for calculating the nutrient values 'per 100 ml', after reconstitution with milk

- As the type of milk is not indicated, full-fat milk should be considered the default. Please refer to Paragraphs 29(c) and (d) on guidance relating to incorporating the nutritional content of milk in the NIP.
- When scaling to 100 ml, the final volume of the reconstituted beverage should be taken into consideration, after dilution with the fluids. For the purpose of calculation, it can be taken that addition of 1 g of product resulted in 1 ml increase in volume of reconstituted beverage.

	Per serving (30 g mix)	170 ml full-fat milk	30 g mix + 170 ml full-fat milk (i.e. taken to be 200 ml)	Scaled down to 100 ml
Saturated Fat	1.5 g	$2.25 \text{ g} \times \frac{170 \text{ ml}}{100 \text{ ml}} = 3.825 \text{ g}$	5.325 g	2.7 g
Total Sugar	10.0 g	$4.50 \text{ g} \times \frac{170 \text{ ml}}{100 \text{ ml}} = 7.65 \text{ g}$	17.65 g	8.8g
Lactose	4.0 g	$4.50 \text{ g} \times \frac{170 \text{ ml}}{100 \text{ ml}} = 7.65 \text{ g}$	11.65 g	5.8g
Total Sugar - Lactose	6.0 g	0 g	6.0 g	3.0 g



Derivation of the grade for Nutri-Grade mark	
Step 1: Sugar content grade	As lactose is declared on the NIP, the sugar content to be used for the grading is total sugar minus lactose content. The final sugar content is 3.0 g per 100ml, thus the sugar content grade is "B".
Step 2: Saturated fat content grade	With 2.7 g/100ml saturated fat, the saturated fat content grade is "C".
Step 3: Non-sugar substitutes	Does not contain non-sugar substitutes
	<p><b>The grade is "C".</b></p>

## Section 6: Nutri-Grade mark

47. This section states the information that should be disclosed on the label, and summarises the key graphic and application requirements for product packages and other settings. **Please refer to the following for additional requirements for the Nutri-Grade mark:**

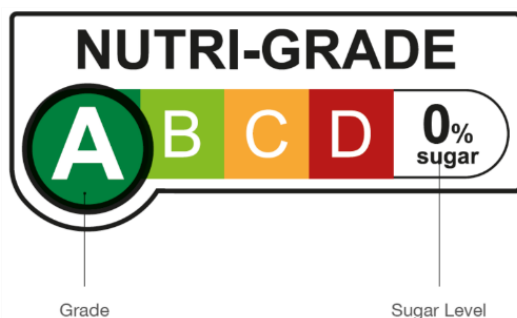
- a) [Specifications of the Nutri-Grade mark<sup>10</sup>](#), which provides mandatory specifications for the Nutri-Grade mark, referred to in the *Food Regulations, Regulation 184D(5)*.
- b) [Usage Guide for Graphic Applications of the Nutri-Grade mark<sup>11</sup>](#), which provides guidelines on graphic applications of the Nutri-Grade mark.

### Section 6.1: Information on the Nutri-Grade mark

48. The Nutri-Grade mark contains two key pieces of information about the beverage (see Figure 4):

- a) Its grade (“A”, “B”, “C” or “D”); and
- b) Its percentage of sugar content per 100 ml, rounded to the nearest whole number (“sugar level”).

Figure 4: Information in the Nutri-Grade mark



Note: The numerical value for the sugar level should be amended, to accurately reflect the sugar content of the beverage.

49. **Grade.** There are four possible grades on the Nutri-Grade mark - “A”, “B”, “C” and “D”. Manufacturers, local importers and distributors must accurately determine the Nutri-Grade beverage’s grade in accordance with the grading system specified in Section 5.

50. **Sugar level.** In addition, the product’s sugar level must be declared on the Nutri-Grade mark. The sugar value declared should be:

- a) determined based on the same guidelines in Paragraph 41(a) for the derivation of the grade based on sugar content;

<sup>10</sup> The document is available under the “Resources” section of HPB’s website, at <https://www.hpb.gov.sg/healthy-living/food-beverage/nutri-grade>.

<sup>11</sup> The document is available under the “Resources” section of HPB’s website, at <https://www.hpb.gov.sg/healthy-living/food-beverage/nutri-grade>.

- b) expressed as a whole number through standard rounding per Table 8 below. Please refer to Section 5.2 on the rounding rules to determine the grade based on the amounts of sugar and saturated fat.

Table 8: Rounding rules for numerical value for the sugar level on Nutri-Grade mark

<b>Sugar content (rounded to 1 decimal place) (g/100ml)</b>	<b>Numerical value for the sugar level on Nutri-Grade mark</b>	<b>Grade based on sugar amount</b>
0-0.4	0%	A
0.5-1.0	1%	A
1.1-1.4	1%	B
1.5-2.4	2%	B
2.5-3.4	3%	B
3.5-4.4	4%	B
4.5-5.0	5%	B
5.1-5.4	5%	C
5.5-6.4	6%	C
6.5-7.4	7%	C
7.5-8.4	8%	C
8.5-9.4	9%	C
9.5-10.0	10%	C
10.1-10.4	10%	D
10.5-11.4	11%	D
Etc.		

## Section 6.2 General graphic requirements for the Nutri-Grade mark

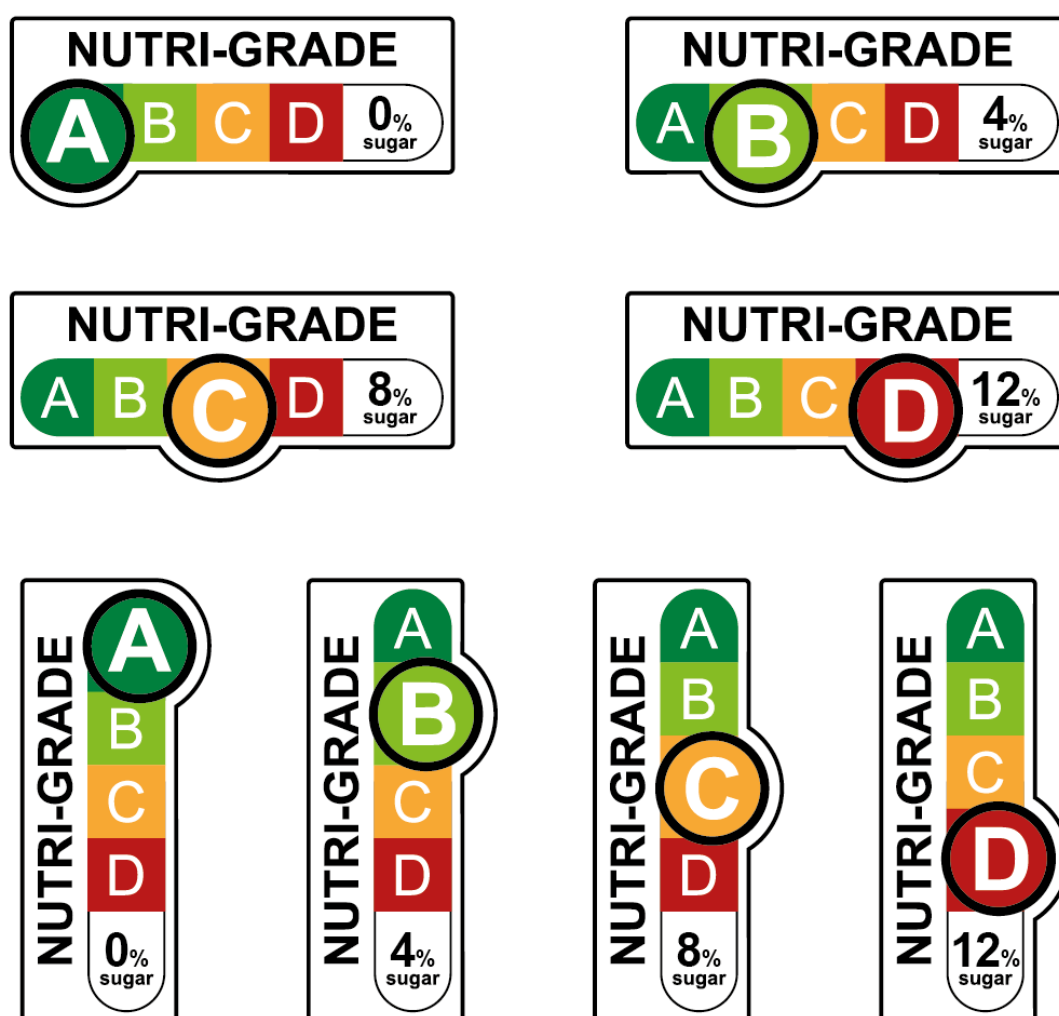
51. The components of the mark are fixed. In all situations, the digital artwork provided by HPB should be used and no modification to the mark is allowed, other than to adjust to the required size proportionally and to edit the numerical value for the percentage of sugar content. When adjusting to the appropriate size, there should be no modification to the proportions of the mark.
52. **Font type and font size.** The word “sugar” and the corresponding number indicating the sugar content must be displayed in Arial Bold typeface. The height of the number indicating the sugar content must be the same height as the words “NUTRI-GRADE” on the mark.
53. **Colour.** The Nutri-Grade mark shall be printed in full colour CMYK or Pantone. No monochrome printing is allowed. The eventual colours printed should not appear recognizably different from the prescribed colours (e.g. discoloured, faint or faded). The following colours should be used in a Nutri-Grade mark for the following elements:
- Grade “A” – Pantone 2423C or CMYK 100C 25M 100Y;
  - Grade “B” – Pantone 375C or CMYK 55C 100Y;
  - Grade “C” – Pantone 1375C or CMYK 40M 85Y;
  - Grade “D” – Pantone 2035C or CMYK 20C 100M 100Y 8K;
  - The words “NUTRI-GRADE”, “sugar” and the corresponding number indicating the sugar content, as well as the shape outlines – Pantone Black C or CMYK 100K.
54. **Variants.** The Nutri-Grade mark is available in both horizontal and vertical variants, for each of the four grades (“A”, “B”, “C” and “D”) respectively (please see Figure 5). The horizontal variant should be used as the default and the vertical variant may only be used when application of the horizontal variant is not possible. Examples of such scenarios are:
- There is insufficient horizontal clear space to display the horizontal variant;
  - The background of the packaging design is too busy such that the vertical variant would be more legible compared to the horizontal variant.
55. **Size.** The Nutri-Grade mark must fulfil the following minimum size requirements:
- The long side of the mark must be at least the sum of the width and height of the front-of-pack (FOP) area, divided by 7 (expressed in an equation below), subject to sub-para (b);

$$\text{Minimum length of long side of mark} = \frac{\text{width of FOP area} + \text{height of FOP area}}{7}$$



- b) For the purpose of sub-para (a), the FOP area is:
- i. the face of the package where the Nutri-Grade beverage's name and brand (if there is a brand) appear and that is in the principal field of vision of the prospective purchaser; and
  - ii. demarcated by the printed area, product sleeve or label on the package. In the case of cylindrical packages (e.g. bottles, cans), the width is defined as the circumference of the pack divided by three;
- c) In all circumstances, the long side of the mark must be at least 19.8 mm, and the short side must be at least 8.5 mm.

Figure 5: Variants of the Nutri-Grade mark



Note: The numerical value for the sugar level should be amended, to accurately reflect the sugar content of the beverage.

### Section 6.3 Application requirements for product packages

56. The Nutri-Grade mark must be applied on the FOP surface of the product package [please see Paragraph 55(b)].

- a) If there are multiple surfaces that fulfil the definition of a FOP surface (e.g. rectangular carton where both front and back surfaces are identical), the Nutri-Grade mark must be applied on at least one surface and the surface carrying the Nutri-Grade mark should face prospective purchasers by default at point-of-sale. For avoidance of doubt, manufacturers, local importers and distributors are encouraged to apply the label on all surfaces that fulfil the definition of a FOP surface.

57. By default, the Nutri-Grade mark should be within the printed area, product sleeve or label of the package. If this is not possible, it can be elsewhere on the front face of the package.

58. The Nutri-Grade mark must be marked on or securely attached in a prominent and conspicuous position to the beverage package and shall be clearly legible. This may be achieved by means of adhesive sticker labels.

- a) By “securely attached”, this means the label containing the Nutri-Grade mark should not be easily removable and is likely to remain attached to the package during the expected shelf-life of the package.
- b) To remain clearly legible, the Nutri-Grade mark should be water-resistant and the ink should not run when condensation/spillage occurs.

#### ***Application requirements for multipacks (see Paragraph 16 for definition of “multipacks”)***

59. The Nutri-Grade mark should be labelled in respect of each type of Nutri-Grade beverage within the multipack. The mark may be marked on or securely attached to:

- a) The FOP surface of the outer packaging of the multipack and not the units of the prepacked Nutri-Grade beverage, if the outer packaging of the multipack includes a statement that each unit in the package must not be sold separately or a statement to the like effect (e.g. “Not to be sold separately”);
- b) The FOP surface of each unit of the prepacked Nutri-Grade beverage in the multipack, and not the outer packaging of the multipack, if the outer packaging of the multipack is wholly transparent (e.g. clear plastic sleeve) and the Nutri-Grade mark on each unit within the multipack is clearly visible by prospective purchasers through the outer packaging; or

Industry may also mark or securely attach the Nutri-Grade mark to both the front-of-pack surface of each individual unit of beverage and the outer packaging of the multipack, to fulfil Regulation 184D(4).

These requirements are summarised in Table 9 below.

Table 9: Minimum requirements for the labelling of NIP(s) and Nutri-Grade mark(s) for multipacks

		Is the outer packaging of the multipack wholly transparent such that the FOP of each unit within the transparent packaging is labelled and the Nutri-Grade mark, is clearly visible through the outer packaging?	
		Yes <i>(e.g. clear plastic sleeve with no artwork design, wrapped around six 1.5 litre bottles)</i>	No <i>(e.g. opaque cardboard box carrying 16 cans of drinks)</i>
Are the products intended for sale in multipack form only and does the outer packaging include a statement that the units in the multipack are not to be sold separately or a statement to the like effect (e.g. "Not to be sold separately")?	Yes	<p><b>It is sufficient to label the NIP(s) and Nutri-Grade mark(s) on:</b></p> <ul style="list-style-type: none"> <li>Individual units only; OR</li> <li>Outer packaging of multipack only.</li> </ul>	<p><b>It is sufficient to label the Nutri-Grade mark(s) on:</b></p> <ul style="list-style-type: none"> <li>Outer packaging of multipack only. (Note: Labelling on individual units only is not sufficient.)</li> </ul> <p>It is sufficient to label the <b>NIP(s)</b> on:</p> <ul style="list-style-type: none"> <li>Individual units only; OR</li> <li>Outer packaging of multipack only.</li> </ul>
	No	<p><b>It is sufficient to label the NIP(s) and Nutri-Grade mark(s) on:</b></p> <ul style="list-style-type: none"> <li>Individual units only.</li> </ul> <p>(Note: Labelling on multipack only is not sufficient.)</p>	<p><b>The Nutri-Grade mark(s) must be labelled on both individual units AND on the outer packaging of the multipack.</b></p> <p>(Note: Labelling on individual units only, or outer packaging of multipack only, are not sufficient)</p> <p><b>It is sufficient to label the NIP(s) on:</b></p> <ul style="list-style-type: none"> <li>Individual units only.</li> </ul> <p>(Note: Labelling on multipack only is not sufficient.)</p>

## Section 6.4 Application requirements for settings other than product packages

60. In addition to being applied on the FOP surface of product packages, an image of the Nutri-Grade mark should also be displayed so a prospective purchaser of the Nutri-Grade beverage may see the image (i.e. before the Nutri-Grade beverage is sold). This is mandatory for Nutri-Grade beverages graded “C” or “D” that are available for sale by retail in Singapore, and voluntary for Nutri-Grade beverages graded “A” or “B”.

61. The key requirements at the various settings are summarised in Table 10.

Table 10. Requirements to display an image of the Nutri-Grade mark, other than on product package

<b>Setting</b>	<b>Additional Labelling requirements:</b> <i>The image of the Nutri-Grade mark should...</i>	<b>Graphic specifications</b>
Where the beverage is sold online (e.g. online supermarkets)	<ul style="list-style-type: none"> <li>• Be clearly displayed next to or in direct relation to the online image or text listing of the beverage, in the same display as seen by a prospective purchaser (e.g. on product listings, search results and payment pages)</li> </ul>	Please refer to the “Usage Guide for Graphic Applications of the Nutri-Grade mark” for the full guidance on the graphic and application specifications.
Where the beverage is sold at a vending machine	<ul style="list-style-type: none"> <li>• Be clearly visible on the package of the Nutri-Grade beverage through the window of the vending machine, if the window is clear; OR</li> <li>• Be clearly displayed next to or in direct relation to the image or text listing or the price tag of the beverage.</li> <li>• Not be easily removable, if adhesive labels are used</li> </ul>	
Where the beverage is sold from a purchaser-facing automated beverage dispenser	<ul style="list-style-type: none"> <li>• Be clearly displayed on or near to the dispenser so that it is visible to a prospective purchaser;</li> <li>• Be displayed next to or in direct relation to the image or text listing of the Nutri-Grade beverage, if there are more than one beverage available at the dispenser; AND</li> <li>• Not be easily removable, if adhesive labels are used</li> </ul>	

### **Definition**

**“Purchaser-facing automated beverage dispenser”** means an automated beverage dispenser (ABD) that shows an image or text listing of what beverage may be dispensed and is placed —

- (a) at or behind a sales counter in a way that allows a prospective purchaser to see the image or text listing (e.g. ABDs commonly seen in fast food restaurants);
- (b) to allow a prospective purchaser to dispense a beverage of his choice, based on the image or text listing (e.g. ABDs usually located away from the sales counter and used in convenience stores or fast food restaurants)
- (c) in any other way that allows a prospective purchaser to see the image or text listing.

62. For the avoidance of doubt, for eating and catering establishments,

- a) Currently there is no requirement to display an image of the Nutri-Grade mark on menus, at online locations of sale (e.g. food delivery platforms) or at automated beverage dispensers that are not purchaser-facing. These requirements may be introduced in the future;
- b) Displaying the Nutri-Grade mark is still required for Nutri-Grade beverages sold via vending machines and purchaser-facing automated beverage dispensers.

### **Frequently Asked Questions**

#### **A. Who is responsible for the labelling of the Nutri-Grade mark on the packages of prepacked Nutri-Grade beverages?**

- The *Food Regulations* require that the following persons ensure that a Nutri-Grade beverage is graded, its package is labelled with the Nutri-Grade mark if the Nutri-Grade is graded “C” or “D”, and the Nutri-Grade mark contains accurate information. That is,
  - i. If a Nutri-Grade beverage is manufactured in Singapore for sale by retail in Singapore, its manufacturer;
  - ii. If a Nutri-Grade beverage is imported for sale by retail in Singapore, its local importer; or
  - iii. In any other case (e.g. in the event that a local distributor purchases the Nutri-Grade beverages from manufacturers or local importers, and thereafter label the product under its own brand name), its distributor.
- While the manufacturer, local importer and distributor have the legal responsibility of ensuring the accurate labelling of the NIP, they may engage a third party to do the labelling.

**B. Who is responsible for the display of the Nutri-Grade mark for Nutri-Grade beverages sold online?**

- A person who sells a Nutri-Grade beverage by retail online must ensure an image of a Nutri-Grade mark is displayed so a prospective purchaser of may see the image, if the Nutri-Grade beverage's grade is "C" or "D".
- Online platform owners, are strongly encouraged to support compliance with these display obligations, including but not limited to ensuring that the online platform allows for the display of the Nutri-Grade mark, persons who sell the Nutri-Grade beverage via their online platform are aware of these display obligations, and work with the authorities to take down non-compliant content.

**C. Who is responsible for the display of the Nutri-Grade mark for Nutri-Grade beverages sold by retail from a vending machine?**

- A person who sells a Nutri-Grade beverage by retail from a vending machine must ensure an image of a Nutri-Grade mark is displayed so a prospective purchaser may see the image, if the Nutri-Grade beverage's grade is "C" or "D".
- This person is responsible for:
  - i. If the window of the vending machine is clear, (a) ensuring that only stocks that display the Nutri-Grade mark on their FOP surface are acquired; and (b) ensuring that the beverages are displayed in a manner such that the image of the Nutri-Grade mark on its FOP surface is clearly visible through the window to prospective purchasers; or
  - ii. If the window of the vending machine is not clear, ensuring the image of the Nutri-Grade mark is displayed on the image or text listing or price tag of the Nutri-Grade beverage.
- Where necessary, this person shall ensure that the information to be displayed is accurate, including but not limited to liaising with the manufacturer, local importer or distributor (where applicable) of the Nutri-Grade beverage(s) being sold from the vending machine.

**D. Who is responsible for the display of the Nutri-Grade mark for Nutri-Grade beverages sold from a purchaser-facing automated beverage dispenser?**

- A person who sells a Nutri-Grade beverage by retail from a purchaser-facing automated beverage dispenser must ensure an image of a Nutri-Grade mark is displayed so a prospective purchaser may see the image, if the Nutri-Grade beverage's grade is "C" or "D".
- This person shall be responsible for:
  - Ensuring that the image of the Nutri-Grade mark is clearly displayed on, or near to, the automated beverage dispenser; and
  - If more than one beverage is available from the automated beverage dispenser, ensuring the image is displayed next to or in direct relation to the image or text listing of the beverage.



- Where necessary, this person shall ensure that the information to be displayed is accurate, including but not limited to liaising with the manufacturer, local importer or distributor (where applicable) of the Nutri-Grade beverage being sold from the automated beverage dispenser.

**E. For Nutri-Grade beverages sold online, must the Nutri-Grade mark be displayed at every online listing?**

- Yes. The *Food Regulations*, Regulation 184E(2)(a) requires that for Nutri-Grade beverages sold online, the Nutri-Grade mark is clearly displayed next to or in direct relation to online images or text listings of the Nutri-Grade beverage.
- An online listing of a Nutri-Grade beverage refers to a feature that –
  - i. Contains information about the name and price of the Nutri-Grade beverage, and
  - ii. Contains a link that allows a prospective purchaser to purchase the Nutri-Grade beverage Please see examples of online listings in Table 11.

Table 11. Examples of “online listings of a Nutri-Grade beverage”

Online listing of a Nutri-Grade beverage	Not an online listing of a Nutri-Grade beverage
<ul style="list-style-type: none"> <li>• Online page that lists all the available Nutri-Grade beverages for sale, with a corresponding “Add to Cart” button for each beverage</li> <li>• Online page dedicated to a single Nutri-Grade beverage for sale, with a corresponding “Add to Cart” button</li> <li>• Recommended listing of specific Nutri-Grade beverages that may be added-on to one’s shopping basket</li> <li>• Search results with a link to purchase</li> </ul>	<ul style="list-style-type: none"> <li>• Listings of brands or merchants that are available on the platform</li> <li>• Listings of categories of products that are available (e.g. Fresh Produce, Beverages, Household Products)</li> <li>• Search results without a link to purchase</li> </ul>

**Section 6.5 Links and resources**

63. Please refer to the HPB website (<https://www.hpb.gov.sg/healthy-living/food-beverage/nutri-grade>) to obtain important resources, including the following:

- a) Specifications of the Nutri-Grade mark, which provides mandatory specifications for the Nutri-Grade mark, referred to in the *Food Regulations*, Regulation 184D(5);
- b) Usage Guide for Graphic Applications of the Nutri-Grade mark, which provides guidelines on graphic applications of the Nutri-Grade mark; and
- c) Vector files for the Nutri-Grade marks.

## Section 7: Advertising Prohibition

### Section 7.1 Affected advertisements and media platforms

64. Advertisements stated in the *Food Regulations*, Regulation 184F(1), which are used or apparently used to promote, directly or indirectly, the sale of Nutri-Grade beverages graded “D” are prohibited across all media platforms, except for advertisements stated in Paragraph 65.

#### **Definition of “advertisement”** (see section 2 of the Sale of Food Act)

**Advertisement** means any of the following where used or apparently used to promote, directly or indirectly, the sale of food:

- a) Any words, whether written or in an audible message;
- b) Any still or moving picture, sign, symbol or other visual image or representation;
- c) Any combination of 2 or more of those things in paragraph (a) or (b),

But does not include communications of personal opinion made by an individual (for no commercial gain) to the public or a section of the public in relation to any goods or services, brand of goods or services, or person who provides goods or services.

65. Advertisements listed in the *Food Regulations*, Regulation 184F(2) are not subject to the prohibition. These are:

- a) An advertisement that does not contain a recommendation relating to the consumption of the Nutri-Grade beverage and is published by means of a catalogue, price list, or other document for the purpose of supplying the Nutri-Grade beverage by wholesale;
- b) An advertisement that provides information about the name and price of a Nutri-Grade beverage but does not otherwise promote its sale and is published –
  - i. on the corporate website of the manufacturer, importer, retailer or distributor; or
  - ii. as part of a product launch event that is not accessible to any member of the general public other than an invited guest; or
  - iii. in the form of a press or media release
- c) An advertisement that complies with both requirements (i) and (ii) below:
  - i. An advertisement that is published –
    - A. if the Nutri-Grade beverage is sold while carrying on a retail food business — at the food establishment where that business is carried on;
      - As a general guide, this includes the entire area of the establishment demarcated by the entrance or exit points, the establishment’s frontage and outdoor areas where applicable



- B. if the Nutri-Grade beverage is sold in prepacked form from a vending machine — on the vending machine;
  - C. if the Nutri-Grade beverage is sold from an automated beverage dispenser — on the automated beverage dispenser; or
  - D. if the Nutri-Grade beverage is sold online — at the online location of sale.
- ii. The advertisement displays an image of the beverage’s Nutri-Grade mark, except for advertisements that involve communication in an audible message. Such advertisements need not display the image of the Nutri-Grade mark but must include the audible message that ‘The Nutri-Grade of this product is D’.

66. A summary of what is prohibited and not prohibited, is in Table 12.

Table 12: Summary of what is prohibited and not prohibited

Prohibited	Not prohibited
<p>Advertisements that promote the sale of Nutri-Grade beverages graded “D”, such as:</p> <ul style="list-style-type: none"> <li>• Advertisements that feature beverages graded “D”, whether alone or alongside other products;</li> <li>• Advertisements that feature financial or material inducement(s) in relation to Nutri-Grade beverages graded “D” (e.g. a newspaper advertisement featuring a supermarket sales promotion)</li> </ul>	<ul style="list-style-type: none"> <li>• Brand advertisements that do not feature any particular product.</li> <li>• Advertisements that promote the sale of Nutri-Grade beverages graded “A”, “B” or “C”.</li> <li>• Communications of personal opinion made by an individual for no commercial gain, such as organic user content on social media.</li> <li>• A trade advertisement that is published in a catalogue, price list, or other document for the purpose of supplying the beverage by wholesale and does not contain a recommendation relating to its consumption.</li> <li>• An informational statement about the beverage, which may contain information about its name and price but does not otherwise promote its sale, and that is published – <ul style="list-style-type: none"> <li>○ on the corporate website of the manufacturer, importer or retailer (e.g. product catalogue);</li> <li>○ as part of a product launch event that is not accessible to any member of the general public other than an invited guest; or</li> <li>○ in the form of a press or media release.</li> </ul> </li> <li>• An advertisement that is published at the following locations, provided the requirements in Regulation 184F(2)(c), further explained in Section 7.2, are met: <ul style="list-style-type: none"> <li>○ the food establishment where the retail food business that sells the Nutri-Grade beverage is carried on;</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ at the vending machine if the beverage is sold from the same vending machine; or</li> <li>○ if the beverage is sold online, at the online location of sale.</li> <li>• The act of offering financial or material inducement such as offering discounts, gifts, free samples, donations, tie-in sales, or other promotions.</li> </ul>
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67. Examples of media platforms where a person must not publish, cause to be published or take part in the publication of advertisements used or apparently used to promote, directly or indirectly, the sale of Nutri-Grade beverages graded “D”, are set out in Table 13.

Table 13: Examples of media platforms where a person must not publish, cause to be published or take part in the publication of advertisements used or apparently used to promote, directly or indirectly, the sale of Nutri-Grade beverages graded “D”

<b>Platform</b>	<b>Examples</b>
Broadcast	<ul style="list-style-type: none"> <li>• Television commercials</li> <li>• Radio advertisements</li> </ul> <p>Note: applies to both free-to-air and paid channels</p>
Cinema	<ul style="list-style-type: none"> <li>• On-screen ads (e.g. trailers, product placement within movies)</li> <li>• Off-screen ads</li> </ul>
Print	<ul style="list-style-type: none"> <li>• Newspaper advertisements</li> <li>• Magazine advertisements</li> </ul>
Out-of-home	<ul style="list-style-type: none"> <li>• Posters, billboards, floor stickers, pillar wraps/decals etc.</li> <li>• Advertisements within the public transport network (bus stops/interchanges, train stations, on buses/ trains) and on/in private hire vehicles</li> </ul>
On-ground	<ul style="list-style-type: none"> <li>• Roadshows, events, pop-up stores</li> <li>• Brochures and collaterals used for events</li> <li>• Direct mail, door-to-door marketing</li> </ul>
Online and mobile	<ul style="list-style-type: none"> <li>• Websites, social media, mobile apps: Applies to both paid-for space such as banners, search listings, social media posts and non-paid-for space such as advertiser’s own website or social media page</li> <li>• Direct emails and text messages, broadcasting channels in messaging apps</li> </ul>

## Section 7.2 Display of the Nutri-Grade mark on advertisements at points-of-sale

68. Advertisements at POS platforms that promote the sale of Nutri-Grade beverages graded “D” are exempt from the prohibition, provided they display the image of the Nutri-Grade mark clearly.

69. This requirement to display the Nutri-Grade mark does not apply to trade advertisements or informational statements (e.g. name tags or price tags). These are not subject to the prohibition.

70. Table 14 states the requirements for different types of POS materials.

**Table 14: Examples of POS materials and their different requirements**

<b>Platform</b>	<b>Considered advertisement</b> (i.e. must display Nutri-Grade mark if it features a Grade D beverage)	<b><u>NOT</u> considered advertisement, but mandatory labelling requirements apply</b> (i.e. must display Nutri-Grade mark if it features Grade C/D beverage)	<b><u>NOT</u> considered advertisement, and mandatory labelling requirements do not apply either</b> (i.e. no requirement to display the Nutri-Grade mark)
Physical stores	<ul style="list-style-type: none"> <li>• Special product displays (e.g. gondolas, product sampling booths, wobblers, table/ floor/ fridge stickers, standees etc.)</li> <li>• Audio messages played in the store</li> </ul>	Product packages	Price tags, including those indicating a discounted price and generic price tags stating price for a range of products
Vending machines	<ul style="list-style-type: none"> <li>• Wraps, decals on the machine etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Product packages (if visible through window of machine)</li> <li>• Tags indicating the name or price</li> </ul>	
Automated beverage dispensers	<ul style="list-style-type: none"> <li>• Wraps, decals on the machine etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Listings indicating the name or price</li> </ul>	
Online location of sale (e.g. e-commerce site)	<ul style="list-style-type: none"> <li>• Features that draw undue attention to the product (e.g. banners, pop-ups, main page features, product images used in category listings etc.)</li> </ul>	Listings that – <ul style="list-style-type: none"> <li>• Contain information about the name and price of the Nutri-Grade beverage; and</li> <li>• Contain a link that allows a person to</li> </ul>	

		purchase the Nutri-Grade beverage (see Table 11)	
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71. The Nutri-Grade mark may appear either as part of the image of the Nutri-Grade beverage, or elsewhere on the advertisement with direct reference made to the Nutri-Grade beverage. The full Nutri-Grade mark must be visible and not partially blocked or obscured by other parts of the advertisement. Please refer to the “Usage Guide for Graphic Applications of the Nutri-Grade mark” for the full guidance on the graphic and application specifications of the label on advertisements.

72. If the advertisement is in the form of an audible message, such as in the case of audio or verbal advertisements, it must include the message that ‘The Nutri-Grade of this product is D’.

### Frequently Asked Questions

**A. Are advertisements that originate from foreign media (e.g. overseas broadcast programmes, overseas publications, social media advertisements from overseas companies) subject to the prohibition?**

The advertising prohibition applies when the act of publishing, causing to be published or taking part in the publication of the advertisement is carried out in Singapore. For example, this includes social media advertisements where the act of publication is in Singapore.

**B. Are the following subject to the advertising prohibition?**

Table 15 contains a few commonly queried types of engagements in relation to advertising prohibition and their classifications.

Table 15: Commonly queried types of engagements and their classifications

Engagement	Classification	Remarks
Free gifts	Not subject to prohibition	<ul style="list-style-type: none"> <li>The act of offering free gifts does not fall under the definition of an advertisement.</li> <li>However, advertisements of such free gifts, such as on websites or in newspapers, are subject to the prohibition if they feature Nutri-Grade beverage(s) graded “D”.</li> </ul>
Price promotions (e.g. price discounts, bulk discounts)	Not subject to prohibition	<ul style="list-style-type: none"> <li>The act of offering price promotions does not fall under the definition of an advertisement.</li> <li>However, advertisements of price promotions, such as on websites or in newspapers, are subject to the prohibition if they feature Nutri-Grade beverage(s) graded “D”.</li> </ul>

Product location, at a point-of-sale	Not subject to prohibition	<ul style="list-style-type: none"> <li>The location/placement of products does not fall under the definition of an advertisement.</li> <li>This includes positioning of products near cashier, or for online locations of sale, the recommended listing of add-on products at check-out page.</li> </ul>
Sponsorships	Not subject to prohibition	<ul style="list-style-type: none"> <li>The act of offering sponsorships (e.g. monetary, in-kind) does not fall under the definition of an advertisement.</li> <li>However, advertisements that arise from the sponsorship or partnership agreement (e.g. product placement in shows) are subject to the prohibition if they feature Nutri-Grade beverage(s) graded “D”.</li> </ul>
Public relation (PR) kits	Not subject to prohibition	<ul style="list-style-type: none"> <li>The act of distributing PR kits does not fall under the definition of an advertisement.</li> <li>However, advertisements that arise from the receipt of the PR kit, such as posts on social media, are subject to the prohibition if they feature Nutri-Grade beverage(s) graded “D” and directly/ indirectly promote the sale of the Nutri-Grade beverage.</li> </ul>
Influencer post on social media	Depends	<ul style="list-style-type: none"> <li>Social media posts that are made by an individual for commercial gain are subject to the prohibition if they feature Nutri-Grade beverage(s) graded “D”.</li> <li>However, posts that are made by the individual for no commercial gain are <u>not</u> subject to the prohibition.</li> </ul>
Product placements	Depends	<ul style="list-style-type: none"> <li>Intentional and sponsored product placement of Nutri-Grade beverage(s) graded “D” in any media type (e.g. TV show, movie, online video) is considered a form of advertisement and is subject to the prohibition.</li> <li>Incidental product placements will be assessed on a case-by-case basis. They may well constitute an advertisement if they meet the definition of “promoting the sale, directly or indirectly, of the sale of food”. Advertisers and media owners are advised to exercise caution in this regard.</li> </ul>

Product listings on company's own website/ media	Depends	<ul style="list-style-type: none"> <li>• Product listings/catalogues on a company's own website that contain factual information about the available products and do not promote certain products over others, are not subject to the prohibition.</li> <li>• However, if a similar catalogue is used for purposes of promoting product sales to consumers (e.g. distributed via mass mailers), it would be considered an advertisement and be subject to the prohibition.</li> <li>• Also, features that bring undue attention to certain products on a company's own website/ media (e.g. banners, callouts, pop-up) may be considered an advertisement and be subject to the prohibition.</li> </ul>
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**C. Who is responsible for compliance with the advertising requirements?**

- The *Food Regulations* require that a person must not publish, cause to be published, or take part in the publication of, any advertisements used or apparently used to promote, directly or indirectly, the sale of Nutri-Grade beverage(s) graded "D".
- Media platform owners are strongly encouraged to support compliance with these advertising obligations, including but not limited to ensuring that the persons who advertise Nutri-Grade beverages on their platforms are aware of these advertising obligations, and work with the authorities to take down non-compliant content.

**D. Are advertisements that are part of a live broadcast programme or regional broadcast subject to the advertising requirements?**

- Yes, if the advertisements promote the sale of Nutri-Grade beverages graded "D".

## Contacts

Questions concerning the labelling and advertising requirements for Nutri-Grade beverages may be directed to:

Level 5, Policy and Strategy Division  
Health Promotion Board  
3 Second Hospital Avenue  
Singapore 168937

Email: [Nutri-Grade@hpb.gov.sg](mailto:Nutri-Grade@hpb.gov.sg)

Please refer to the *Food Regulations* for the full set of requirements related to food labelling.