

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

GUIDANCE DOCUMENT
HEALTH PROMOTION BOARD

REVISED JUNE 2023 VERSION 2.1

Disclaimer

The contents of this document serve as a general guide to the labelling and advertising requirements for Nutri-Grade beverages 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. It should be read in conjunction with the following materials¹:

- a) *Food Regulations*, which provides the relevant legislation effecting the Current Measures. (Note: The additional measures are based on the *Food (Amendment No. 2) Regulations 2023 and Sale of Food (Freshly Prepared Nutri-Grade Beverages — Exemption) Order 2023*.)
- b) Specifications of the Nutri-Grade mark and Sugar Declaration, which provides mandatory specifications for the Nutri-Grade mark and Sugar Declaration for Toppings mark, referred to in the *Food Regulations*.
- c) Usage Guide for Graphic Applications of the Nutri-Grade mark, which provides guidelines on graphic applications of the Nutri-Grade mark.
- d) Frequently Asked Questions and Worked Examples, which provides responses to common queries regarding the measures, and specific applications of the guidance provided within this document.

<u>Version</u>	<u>Date</u>	<u>Remarks</u>
2.1	Jun 2023	Version 2.1 replaces version 2.0 as the revised guide. The measures extended to freshly prepared beverages (hereinafter referred to as “Additional measures” in this document) and indicated in yellow highlight have been published in the gazette on 30 June 2023, for implementation from 30 December 2023.
2.0	Feb 2023	Version 2.0 served as an early release of preliminary guidance to assist industry stakeholders to comply with the Current Measures and the Additional Measures before the latter was gazetted.
1.0	Dec 2021	From 30 December 2022, Nutri-Grade beverages sold in Singapore in prepacked form that is not freshly prepared (hereinafter referred to as “pre-packaged beverages” in this document) and non-customisable beverages dispensed from Automated Beverage Dispensers (ABDs) are subject to labelling requirements and advertising prohibitions in the Food Regulations (hereinafter referred to as “Current Measures” in this document).

¹ These documents are available under the “Resources” section of HPB’s website, at <https://www.hpb.gov.sg/healthy-living/food-beverage/nutri-grade>.

		<p>Version 1.0 served 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</p> <p>Should you have any queries, it is recommended that you refer to the Food Regulations and/or seek independent legal advice.</p>
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Glossary

Please refer to the Glossary section for definitions of key terms, and key changes from terms used in v1.0. Key terms are linked to the Glossary in this document.

Contents

Section 1: Introduction	5
Background and summary of measures	5
Section 2: Scope of products subject to the Nutri-Grade measures	8
Section 3: Provision of Nutrition Information	11
Section 3.1 Placement of the NIP	12
<i>Beverage products in individual package (e.g. bottle, can, packet, sachet)</i>	12
<i>Beverage products in multipacks</i>	12
<i>Beverage products (customisable or non-customisable) dispensed from an ABD, or beverages and toppings listed on materials that inform its sale</i>	13
Section 3.2 Required information and format of the NIP	13
<i>General requirements for the NIP</i>	13
<i>Requirements for pre-packaged beverages sold as powders or concentrates meant to be reconstituted or diluted with fluids before consumption as a beverage</i>	14
<i>Requirements for freshly prepared beverages [New in Dec 2023]</i>	16
<i>Form for the NIP</i>	16
Section 3.3: Methods of analysis and compliance requirements	18
Section 4: Nutri-Grade Grading System	21
Section 4.1: Overall grading system	21
Section 4.2: Rounding rules	26
Section 5: Nutri-Grade mark	27
Section 5.1: Information on the Nutri-Grade mark	27
Section 5.2 Application requirements for product packages of pre-packaged beverages	29
<i>Application requirements for multipacks containing pre-packaged beverages</i>	30
Section 5.3 Application requirements for materials that inform sale of beverages, ABDs and vending machines	31
Section 5.4 Vector files for the Nutri-Grade mark	33
Section 6: Advertising Prohibition	34
Section 6.1 Affected advertisements and media platforms	34
Section 6.2 Labelling the Nutri-Grade mark on advertisements at physical or online variety shops	36
Section 7: Concession for Affected Establishments selling Freshly Prepared Nutri-Grade Beverages [New in Dec 2023]	39
<i>Concession does not apply to pre-packaged beverages and non-customisable beverages from ABDs</i>	40
Contacts	41
Glossary	42

Section 1: Introduction

Background and summary of measures

1. Nutri-Grade beverages sold in Singapore must comply with the requirements in Table 1, based on their grade according to the grading system specified in Section 4.

Table 1: Summary of requirements for Nutri-Grade beverages

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

(Note: Concession will be provided for individuals and entities operating a smaller food business that involves the sale of a freshly prepared Nutri-Grade beverage. Refer to Section 7 for details.)

2. Since 30 December 2022, Nutri-Grade beverages sold in Singapore in pre-packaged form and non-customisable beverages from ABDs have been subject to new labelling requirements and advertising prohibitions in the Food Regulations².
3. From 30 June 2023, the Ministry of Health (MOH) published new labelling requirements and advertising prohibitions to freshly prepared beverages (including customisable beverages from ABDs), and additional labelling requirements for beverages in pre-packaged form and non-customisable beverages from ABDs, to take effect at specified settings from 30 December 2023. Extending the labelling requirements and advertising prohibitions to freshly prepared beverages will enable us to better meet our objective of reducing Singaporeans' overall sugar intake.
4. These measures described above were made after carefully considering the feedback received from public, industry and expert stakeholders, and reviewing existing overseas and local evidence.
5. The objectives and key features of the measures are as follows:
 - a) Labelling of Nutri-Grade mark: The Nutri-Grade mark aims to help consumers identify beverages that are higher in sugar and saturated fat to make 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).

² as amended by the Food (Amendment No. 2) Regulations published on 30 December 2021

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. Labelling of the Nutri-Grade mark is optional for Nutri-Grade beverages graded “A” or “B”.

A summary of the current and new labelling measures for Nutri-Grade beverages and their respective effective dates of implementation are indicated in the table below.

	Retail	Non-retail
Mandatory labelling of Nutri-Grade mark for beverages graded “C” and “D”		
1. On the front of pre-packaged beverages	Implemented since 30 December 2022	NEW (from 30 December 2023)
2. Next to listings of non-customisable beverages dispensed from automated beverage dispensers	Implemented since 30 December 2022	NEW (from 30 December 2023)
3. Next to listings of customisable beverages dispensed from automated beverage dispensers	NEW (from 30 December 2023) Exempted for individuals and entities running smaller food businesses if conditions are met.	
4. On physical and online menus, posters, signs etc. for pre-packaged beverages and non-customisable beverages dispensed from automated beverage dispensers	NEW (from 30 December 2023)	
5. On physical and online menus, posters, signs etc. for freshly prepared beverages, including customisable beverages dispensed from automated beverage dispensers	NEW (from 30 December 2023) Exempted for individuals and entities running smaller food businesses if conditions are met.	
Mandatory labelling of sugar declaration for toppings		
6. On physical and online menus, posters, signs etc. for toppings that can be added to freshly prepared beverages	NEW (from 30 December 2023) Exempted for individuals and entities running smaller food businesses if conditions are met.	

- b) Mandatory provision of nutrition information: All Nutri-Grade beverages have to be provided with its nutrition information. A summary of the requirements and their respective effective dates of implementation are indicated in the table below.

	Retail	Non-retail
Mandatory provision of nutrition information on Nutri-Grade beverages		
7. Labelled on pre-packaged beverages	Implemented since 30 December 2022	NEW (from 30 December 2023)
8. Made available either by an electronic record or a physical copy for non-customisable beverages dispensed from automated beverage dispensers	Implemented since 30 December 2022	NEW (from 30 December 2023)
9. Made available either by an electronic record or a physical copy for freshly prepared beverages, including customisable beverages dispensed from automated beverage dispensers	NEW (from 30 December 2023) <i>Exempted for individuals and entities running smaller food businesses if conditions are met.</i>	

Mandatory provision of nutrition information on toppings	
10. Made available either by an electronic record or a physical copy for toppings	<p>NEW (from 30 December 2023)</p> <p><i>Exempted for individuals and entities running smaller food businesses if conditions are met.</i></p>

- c) 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 point-of-sale (POS) platforms **(limited to physical and online variety shops from 30 December 2023)** will have to be labelled with the Nutri-Grade mark. A summary of the Nutri-Grade advertisement requirements and their respective effective dates of implementation are indicated in the table below.

	Retail	Non-retail
Advertising prohibition of beverages graded “D”		
11. For pre-packaged beverages and non-customisable beverages dispensed from automated beverage dispensers	<p>Implemented since 30 December 2022</p> <p><i>Point-of-Sale advertisements for pre-packaged beverages at physical and online variety shops will continue to be allowed, provided that the Nutri-Grade mark is displayed.</i></p>	
12. For freshly prepared beverages, including customisable beverages dispensed from automated beverage dispensers	<p>NEW (from 30 December 2023)</p> <p><i>Exempted for individuals and entities running smaller food businesses if conditions are met.</i></p>	

13. The measures 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.

Section 2: Scope of products subject to the Nutri-Grade measures

14. The measures will apply to Nutri-Grade beverages sold in Singapore. A “Nutri-Grade beverage” includes the following unless it fits the description within paragraph 9:

[Paras (a) – (c): Implemented since Dec 2022 for retail settings, and to be extended to other specified settings from Dec 2023]

- Pre-packaged 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;
- Pre-packaged beverages that are powders or concentrates that are meant to be reconstituted or diluted with fluids before consumption as a beverage; and
- Beverages dispensed from consumer-facing non-customisable ABDs, which are machines that dispense non-pre-packaged beverages according to a pre-fixed formula, with no option for a prospective consumer of the beverage to customise the amount of any ingredient in the beverage (this includes fountain drinks and beverages dispensed from automated coffee machines); and

[Para (d): New in Dec 2023]

- Freshly prepared beverages, including customisable beverages dispensed from consumer-facing ABDs.
15. Beverages are any substance that are intended to be consumed as a beverage, either without reconstitution or dilution, or after reconstitution or dilution.



16. The following products are not Nutri-Grade beverages³:

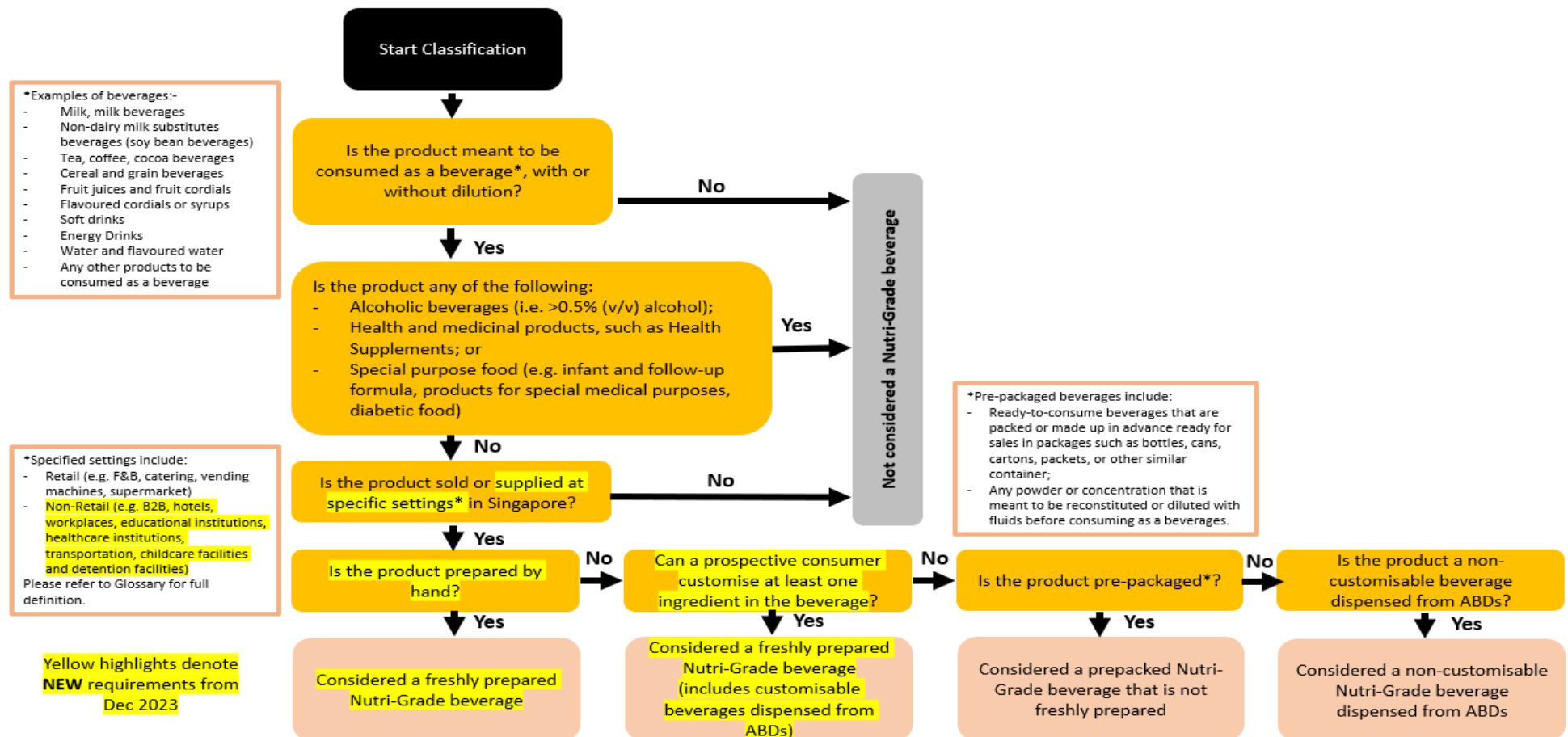
- a) Beverages that contain more than 0.5% (v/v) alcohol at 20°C (for the avoidance of doubt, alcohol replacement drinks such as de-alcoholised beer or wine with ≤0.5% (v/v) alcohol at 20°C do not fall under this sub-paragraph);
- b) **[Will be considered as Nutri-Grade beverages from Dec 2023]** Beverages that are prepared by hand at the place or premises where they are sold;
- c) **[Will be considered as Nutri-Grade beverages from Dec 2023]** Beverages for which a prospective consumer 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.

17. Industry should note that the measures 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).

18. The flow chart in Figure 1 may be used to determine if a product is considered a "Nutri-Grade beverage".

³ 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”



Section 3: Provision of Nutrition Information

19. All Nutri-Grade beverages sold in Singapore (see Section 2), regardless of grade, must be provided with its nutrition information, except for those stated in the *Food Regulations*. Table 2 below summarises the mandatory provision of nutrition information requirement and the responsible parties:

Type of Nutri-Grade beverage	NIP requirement	Responsible parties
For pre-packaged beverages that are: <ul style="list-style-type: none"> • sold by retail [effective since Dec 2022] • sold within other specified settings [new in Dec 2023] 	The package of the Nutri-Grade beverage must be labelled with a NIP.	If the pre-packaged beverage is manufactured in Singapore — its manufacturer . If the pre-packaged beverage is imported for sale — its local importer . In any other case (e.g. in the event that a local distributor purchases the pre-packaged beverages from manufacturers or local importers, and thereafter label the product under its own brand name), its distributor .
<ul style="list-style-type: none"> • For Nutri-Grade non-customisable beverages dispensed from a consumer-facing ABDs [effective since Dec 2022] 	The information required in a NIP must be made available either in a physical or electronic record to any person who wishes to view the information.	<ul style="list-style-type: none"> • Same as above, for pre-packaged beverages.
<ul style="list-style-type: none"> • For freshly prepared Nutri-Grade beverages, including customisable beverages dispensed from consumer-facing ABDs [new in Dec 2023] 	The information required in a NIP must be made available either in a physical or electronic record to any person who wishes to view the information.	<ul style="list-style-type: none"> • Sellers of freshly prepared beverages • For ABDs, the responsibilities lie on the person who calibrates the machine to be able to dispense customisable beverages according to inputs given by a prospective consumer of the beverage.
<ul style="list-style-type: none"> • For toppings listed on materials that inform its sale or provided with a consumer-facing 	The total sugar content of one chosen beverage from the establishment's offerings <u>with the</u>	<ul style="list-style-type: none"> • Sellers of freshly prepared beverages

ABD [new in Dec 2023]	topping, as well as the total sugar content of the same chosen beverage <u>without the topping</u> , must be made available either in a physical or electronic record to any person who wishes to view the information. (see worked example K)	
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20. The following Nutri-Grade beverages are not required to have an NIP, 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 3.1 Placement of the NIP

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

- 21. 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.
- 22. 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

- 23. 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.
- 24. For multipacks, the NIP may be marked on or securely attached to either:
 - a. The package of each unit of the pre-packaged 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 pre-packaged 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”).

If NIPs are applied onto the outer packaging of a variety pack, each NIP has to clearly indicate the beverage it refers to (e.g. a variety pack containing two different products will need to be labelled with each product’s NIPs on its outer packaging).

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.

Beverage products (customisable or non-customisable) dispensed from an ABD, or beverages and toppings listed on materials that inform its sale

- 25. For these beverages, the nutrition information that would have been required in an NIP must be available to any person who wishes to view the information.
- 26. The nutrition information can be made available in either of the following forms:
 - a. Clearly displayed on, or near to, the ABD (e.g., standee on display near the ABD);
 - 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 3.2 Required information and format of the NIP

General requirements for the NIP

- 27. 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.
- 28. The text of the NIP must be clearly and legibly printed in English. It can appear alongside other languages.
- 29. **Mandatory declaration:** The NIP must specify the energy value, and the amounts of the following nutrients (henceforth termed “mandatory nutrients”):
 - a. Protein;
 - b. Carbohydrate;
 - c. Total sugar⁴;
 - d. Fat;
 - e. Saturated fat⁵; and

⁴ 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)).

⁵ 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)).

- f. Any other nutrients for which a nutrition claim is made in respect of the beverage.

[New in Dec 2023] Only declaration of total sugar content is necessary for toppings (i) listed on materials that inform its sale, and (ii) which a prospective consumer may add to the beverage. Provision of nutrition information must be made available in either a physical or electronic record.

30. **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 44(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
 - e. Other nutrients as specified in HPB’s “Handbook on Nutrition Labelling (Singapore)”.
31. 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.
32. 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.
33. 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 pre-packaged beverages sold as powders or concentrates meant to be reconstituted or diluted with fluids before consumption as a beverage

34. For these products, the NIP must:
- 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").
35. For these products, their package must also be labelled with the manufacturer's instructions on how to prepare the beverage.
36. In specifying the values in the beverage as prepared,
- 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.
 - f. All ingredients provided and sold together as a single product must be accounted for in the NIP.
37. In addition, the NIP may also provide supplementary information and 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.

Requirements for freshly prepared beverages [New in Dec 2023]

38. For these products, the nutrition information must be based on the reference variant which refers to:

- a. The default preparation (i.e. the regular version of a freshly prepared Nutri-Grade beverage that is prepared for a prospective consumer who does not customise the amount of any ingredient in the Nutri-Grade beverage) or
- b. If there is no default preparation (e.g. instances where the consumer is required to select from a range of options) – it would be based on the customised preparation of the Nutri-Grade beverage with the poorest grade, and if there is more than one such customised preparation, it would be based on the customised preparation with the highest percentage of sugar content per 100 ml.

Example 1: For a bubble tea store that allows prospective consumers to select from different sweetness levels, the nutrition information, grading and labelling will be determined by the one with the highest sweetness level.

Example 2: If a beverage can be prepared such that it is graded “D” with either 12% sugar or 15% sugar, the nutrition information, grading and labelling will be based on the latter.

39. If toppings are (i) listed on materials that inform sale, and (ii) could be added by a prospective consumer to his beverage – the establishment can choose any one beverage from the establishment’s offerings, and must declare the total sugar content of this beverage with and without the topping (in grams per 100ml of the beverage). **Please refer to the Worked Examples for more information.**

Form for the NIP

40. The text of the NIP shall be in printed letters not less than 1.5 mm in height.
41. Please see Figure 2 for the standard form for the NIP for Nutri-Grade beverages. For manufacturers, local importers, distributors, retailers, sellers, or persons who calibrate ABDs 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

NUTRITION INFORMATION		
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.

42. Pre-packaged beverages with a total surface area of less than 100cm² 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) 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 100cm²

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 3.3: Methods of analysis and compliance requirements

43. The declared values on the NIP may be average values, meaning the value which best represents the energy value and amounts of nutrients in each beverage and reflects allowances for seasonal variability, patterns of consumption and other factors which may cause the actual value to vary.
44. The values on the NIP may be determined based on the methods listed below. Audit checks will be conducted by collecting samples from beverages described in sections 3.1 and 3.2 to monitor the accuracy of the information on the NIP, regardless of the method used to determine the values on the NIP.
 - 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 methods⁶, which is the recommended method of analysis;
 - b. Calculations from generally established and accepted data (e.g. For raw ingredients like fruits, the HPB's Food Composition System Singapore (FOCOS) may be used to obtain the respective nutrient values);
 - c. Calculations from the known or actual values of the ingredients (or powder or concentrate) used.

For reconstituted beverages, calculation can be done 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.

45. 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,

⁶ 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).

monounsaturated fat) over declared amounts are acceptable within current good manufacturing practices.

46. Very low amounts of fat, saturated fat, carbohydrate, total sugar, and protein may be declared in the NIP as described in [Table 3](#).

Table 3: Declaration on NIP for very low amounts of relevant nutrients

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

Nutrient	Amount	Declaration on NIP
Protein	<ul style="list-style-type: none"> • No detectable amount is present; or • Concentration is ≤ 0.5 g per 100 ml 	<ul style="list-style-type: none"> • Declared as “0 g” or “≤ 0.5 g” on NIP

47. The responsible parties (refer to Table 2) for (i) ensuring that a NIP is made available for a beverage, (ii) ensuring the accuracy of the NIP information and manufacturer’s instructions on how to prepare the beverage, and (iii) making and keeping written records to support the nutrient declarations.
48. Responsible parties may consider engaging a third party to do the labelling. To ensure accuracy of the NIP information, responsible parties should consider:
- 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;
 - Liaising with manufacturers and local importers/distributors of Nutri-Grade beverages to obtain the necessary information, if the Nutri-Grade beverage is self-acquired and/or thereafter labelled under their own brand name.
49. 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:
- Laboratory analysis reports;
 - Documentation of the calculations done including information from suppliers where necessary;
 - Instructions for preparation of the beverage;
 - Ingredient listing;
 - Sample of the beverage.

Section 4: Nutri-Grade Grading System

Section 4.1: Overall grading system

50. The responsible parties, according to the requirements set out in the *Food Regulations* Regulation 184B, must ensure that the Nutri-Grade beverages sold in Singapore are graded (“A”, “B”, “C” or “D”) based on the sugar and saturated fat content, according to the grading system shown in [Table 4](#) below. The grade of a Nutri-Grade beverage is the poorer of the following:

- The sugar content grade determined according to Row I in [Table 4](#); and
- The saturated fat content grade determined according to Row II in [Table 4](#).

In addition, beverages graded “A” must not contain any non-sugar substitutes⁷. Please see examples of the application of the grading system in [Table 5](#).

A summary of the responsible parties, grading and labelling requirements for the types of Nutri-Grade beverages can be found in [Table 6](#).

Table 4: Summary of the Grading System underlying the Nutri-Grade

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

Table 5: 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 poorer of the two grades)
2	Within Grade C threshold	Within Grade B threshold	No	Grade C (adopt the poorer of the two grades)
3	Met Grade A threshold	Met Grade A threshold	Yes	Grade B (Grade A must not contain non-sugar substitutes)

⁷ 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.

4	Met Grade A threshold	Met Grade A threshold	No	Grade A (met all criteria for Grade A)
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Table 6: Responsible parties for grading and labelling of Nutri-Grade beverages

Type of Nutri-Grade beverage	Responsible parties to ensure that a Nutri-Grade beverage is: (i) graded, (ii) labelled if the beverage is graded “C” or “D” and (iii) if labelled, contains accurate information on its Nutri-Grade mark.
Pre-packaged Nutri-Grade beverages [Note: the scope will be expanded to other specified settings from Dec 2023]	<ul style="list-style-type: none"> The same responsible parties for NIP labelling (i.e. manufacturer, local importer and distributor) While the responsible parties have the legal responsibility of ensuring the accurate labelling of the NIP, they may engage a third party to do the labelling.
Nutri-Grade beverages sold online [Note: the scope will be expanded to other specified settings from Dec 2023]	<ul style="list-style-type: none"> The same responsible parties for NIP labelling, i.e. <ul style="list-style-type: none"> sellers of freshly prepared beverages [New in Dec 2023]; <ul style="list-style-type: none"> and if the customisable beverage is dispensed from a ABD, the person who calibrates the machine to be able to dispense beverages according to inputs given by a prospective consumer of the beverage [new in Dec 2023] manufacturer, local importer, and distributor for other Nutri-Grade beverages. Online platform owners, are strongly encouraged to support compliance with these labelling obligations, including but not limited to ensuring that the online platform allows for the labelling of the Nutri-Grade mark, persons who sell the Nutri-Grade beverage via their online platform are aware of these labelling obligations, and work with the authorities to take down non-compliant content.
Customisable and non-customisable Nutri-Grade beverages sold from vending machines and ABDs	<ul style="list-style-type: none"> The same responsible parties for NIP labelling, i.e. <ul style="list-style-type: none"> sellers of freshly prepared beverages [New in Dec 2023]; <ul style="list-style-type: none"> and if the customisable beverage is dispensed from a ABD, the person who calibrates the machine to be able to dispense beverages according to inputs given by a

<p>[Note: the scope will be expanded to other specified settings from Dec 2023]</p>	<p>prospective consumer of the beverage [new in Dec 2023]</p> <ul style="list-style-type: none"> ○ manufacturer, local importer, and distributor for other Nutri-Grade beverages. • This person is responsible for: <ul style="list-style-type: none"> i. If the window of the 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 consumers; or ii. If the window of the machine is not clear, ensuring the Nutri-Grade mark is labelled 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 machine, or analysing the nutritional content of the Nutri-Grade beverage.
<p>Nutri-Grade beverages listed on physical or online menus, or other materials that inform its sale [New in Dec 2023]</p>	<ul style="list-style-type: none"> • The same responsible parties for NIP labelling, i.e. <ul style="list-style-type: none"> i. sellers of freshly prepared beverages [New in Dec 2023]; <ul style="list-style-type: none"> ▪ and if the customisable beverage is dispensed from a ABD, the person who calibrates the machine to be able to dispense beverages according to inputs given by a prospective consumer of the beverage [new in Dec 2023] ii. manufacturer, local importer, and distributor for other Nutri-Grade beverages. • A person who <u>provides</u> the listing must ensure the Nutri-Grade mark is labelled next to or in direct relation to the image or text listing if the Nutri-Grade beverage's grade is "C" or "D". • This refers to the person who provides the information that guides the creation of the material that informs the sale of a Nutri-Grade beverage, and <u>not</u> the person who

	<p>acts as an intermediary between the persons who trade in food (e.g., online hosting platforms or printing companies)</p> <ul style="list-style-type: none"> Where necessary, this person shall ensure that the information to be displayed is accurate, including but not limited to analysing the nutritional content of the Nutri-Grade beverage or liaising with the manufacturer, local importer or distributor (where applicable) to obtain the nutritional information of the freshly prepared beverages or the ingredients used to make the freshly prepared beverage.
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51. The grade of a beverage is determined by the information on the NIP (see Section 3), 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.
52. For ready-to-drink pre-packaged 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 pre-packaged beverages declared on NIP in terms of 'per serving' to obtain values 'per 100 ml'

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

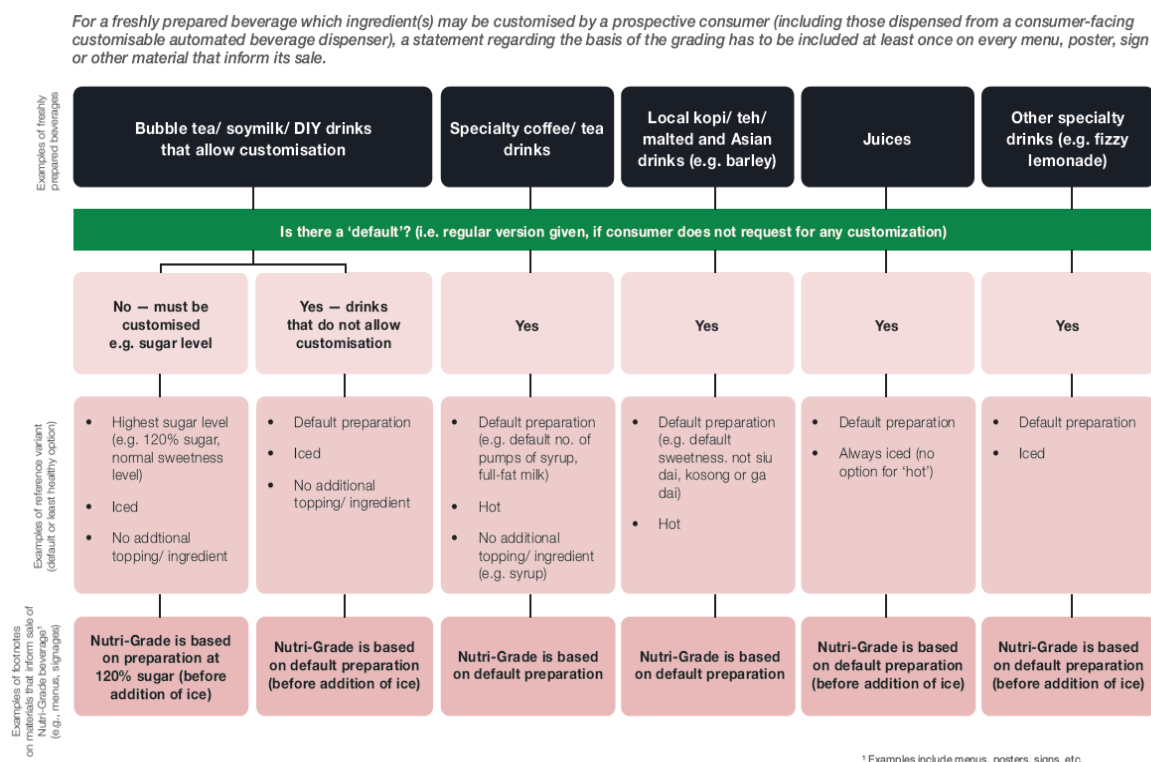
53. For powders/concentrates meant to be reconstituted or diluted with fluids before consumption, “100 ml” means 100 ml of the beverage as prepared, according to the manufacturer’s instructions on how to prepare the beverage, labelled on the product packaging.

- 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.

54. **[New in Dec 2023]** For a freshly prepared beverage which ingredient(s) may be customised by a prospective consumer (including customisable beverages dispensed from a consumer-facing ABD), the grade is based on the reference variant, whose NIP is required to specify the nutrient values per 100ml.

A statement regarding the basis of the grading (e.g. “Nutri-Grade is based on default preparation”) has to be included at least once on every material that inform its sale (e.g. a menu should have at least one statement). See [Figure 4](#) below for more specific examples of the statements:

Figure 4: Examples of reference variants for determining grade of freshly prepared beverage, and suggested statement stating the basis of grading.



Section 4.2: Rounding rules

55. 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.

56. 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.

- 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.
- 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.

57. 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.

- 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.
- 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.

Section 5: Nutri-Grade mark

58. This section states the information that should be disclosed on the mark, and summarises the key graphic and application requirements for product packages and other settings.

59. 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. The eventual colours printed should not appear recognizably different from the prescribed colours (e.g. discoloured, faint or faded).

60. Please refer to the following for requirements for the Nutri-Grade mark⁸:

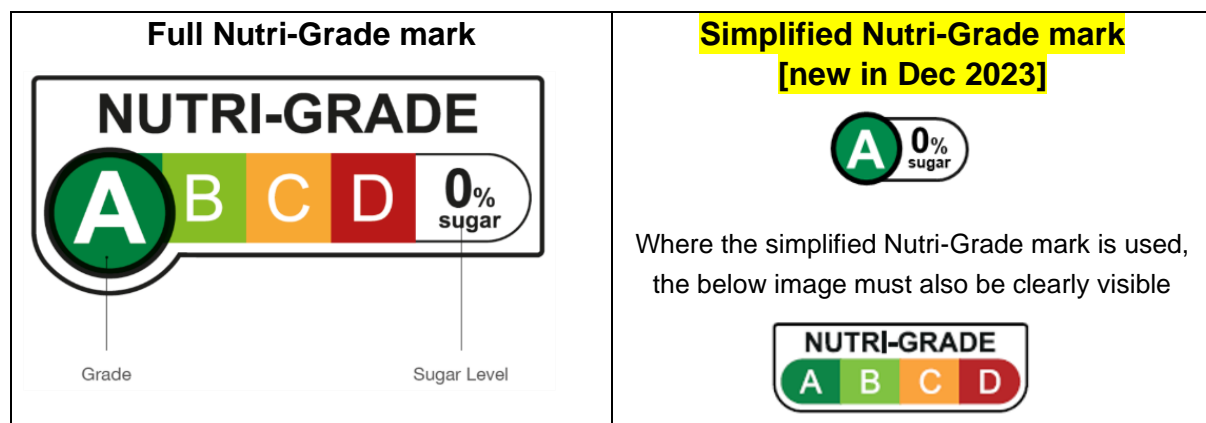
- [Specifications of the Nutri-Grade mark and Sugar Declaration](#), which provides mandatory specifications for the Nutri-Grade mark and the Sugar Declaration for Toppings mark, referred to in the *Food Regulations*, Regulation 184D(5).
- [Usage Guide for Graphic Applications of the Nutri-Grade mark](#), which provides guidelines on graphic applications of the Nutri-Grade mark.

Section 5.1: Information on the Nutri-Grade mark

61. The Nutri-Grade mark contains two key pieces of information about the beverage (see [Figure 5](#)):

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

Figure 5: 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.

⁸ The documents are available under the “Resources” section of HPB’s website, at <https://www.hpb.gov.sg/healthy-living/food-beverage/nutri-grade>.

62. **Grade.** There are four possible grades on the Nutri-Grade mark - “A”, “B”, “C” and “D”. The responsible parties must accurately determine the Nutri-Grade beverage’s grade in accordance with the grading system specified in Section 4.
63. **Sugar level.** In addition, the product’s sugar level must be declared on the Nutri-Grade mark. The sugar value declared should be:
- determined based on the same guidelines in Section 4 for the derivation of the grade based on sugar content;
 - expressed as a whole number through standard rounding per [Table 8](#) below. Please refer to Section 4.2 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

Sugar content (rounded to 1 decimal place) (g/100ml)	Numerical value for the sugar level on Nutri-Grade mark	Grade based on sugar amount
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.		

64. **[New in Dec 2023] Sugar declaration for toppings.** The incremental amount of total sugar a topping would add to a beverage must be declared on materials that inform its sale. These toppings refer to:
- Toppings which are listed on materials that inform its sale, and
 - which a prospective consumer may add to his beverage.

The sugar value declared must be expressed in terms of a percentage per 100ml or 100g, rounded to the nearest whole number through standard rounding. Industry is required to adhere to the format of the white bubbles labelled with the percentage of sugar content, i.e. '+x% sugar' (see Figure 6a).

An alternative declaration in text (see Figure 6b) may be used only when the display of Sugar Declaration of Toppings mark is not possible, such as when there are limitations on digital and app platforms which only allow for the display of text and not images.

Examples of sugar declaration for toppings

Figure 6a: Sugar Declaration for Toppings mark

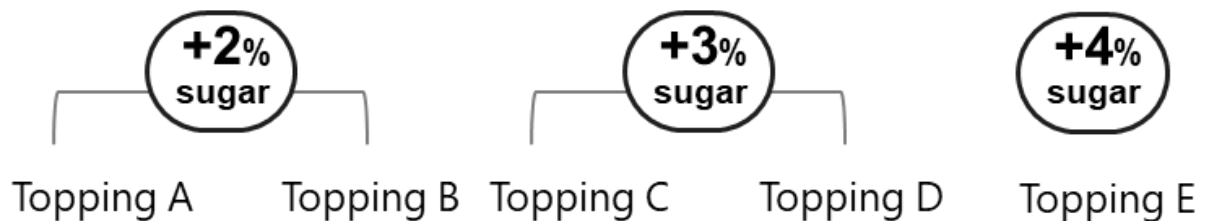


Figure 6b: Alternative Plain Text Display of the Sugar Declaration for Toppings mark

- ☐ Topping A (+2%) sugar
- ☐ Topping B (+2%) sugar
- ☐ Topping C (+3%) sugar
- ☐ Topping D (+3%) sugar
- ☐ Topping E (+4%) sugar

Section 5.2 Application requirements for product packages of pre-packaged beverages

65. The Nutri-Grade mark must be applied on the FOP surface of pre-packaged beverages at specified settings, if they are graded "C" or "D".
 - 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 consumers by default. 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.

66. 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.
67. 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 containing pre-packaged beverages

68. 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 pre-packaged 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 pre-packaged 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.

69. **[New in Dec 2023] Labelling of individual units of pre-packaged beverages within multipacks, if individual units are consumer-facing in specified settings.** According to Regulation 184D(3), if the individual units of the pre-packaged Nutri-Grade beverage are provided to prospective consumers in specified settings (e.g., individual coffee sachets in hotel rooms or offices), these individual sachets will have to be labelled with the Nutri-Grade mark on their FOP if they are graded “C” or “D”.

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 containing pre-packaged beverages at specified settings

		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 <u>only</u> 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	It is sufficient to label the NIP(s) and Nutri-Grade mark(s) on: <ul style="list-style-type: none"> Individual units only; OR Outer packaging of multipack only. 	It is sufficient to label the Nutri-Grade mark(s) on: <ul style="list-style-type: none"> Outer packaging of multipack only. (Note: Labelling on individual units only is not sufficient.) It is sufficient to label the NIP(s) on: <ul style="list-style-type: none"> Individual units only; OR Outer packaging of multipack only.
	No	It is sufficient to label the NIP(s) and Nutri-Grade mark(s) on: <ul style="list-style-type: none"> Individual units only. (Note: Labelling on multipack only is not sufficient.)	The Nutri-Grade mark(s) must be labelled on both individual units AND on the outer packaging of the multipack. (Note: Labelling on individual units only, or outer packaging of multipack only, are not sufficient) It is sufficient to label the NIP(s) on: <ul style="list-style-type: none"> Individual units only. (Note: Labelling on multipack only is not sufficient.)

Section 5.3 Application requirements for materials that inform sale of beverages, ABDs and vending machines

70. In addition to being applied on the FOP surface of product packages of pre-

packaged beverages, responsible parties must ensure that the Nutri-Grade mark is also labelled **at other locations or materials that inform its sale**. This is mandatory for Nutri-Grade beverages graded “C” or “D” sold in Singapore, and optional for Nutri-Grade beverages graded “A” or “B”.

71. The key requirements are summarised in Table 10.

Table 10: Requirements for Nutri-Grade mark labelling (if the Nutri-Grade beverage is graded “C” or “D”), other than on product package of pre-packaged beverages

Scenarios	Additional Labelling requirements: <i>The image of the Nutri-Grade mark should...</i>	Graphic specifications
Where the beverage is sold and presented via physical or electronic or online materials that inform its sale [New in Dec 2023]	<ul style="list-style-type: none"> Be clearly displayed next to or in direct relation to the image or text listing of the beverage 	Please refer to the “Usage Guide for Graphic Applications of the Nutri-Grade mark” for the full guidance on the graphic and application specifications. As above.
Where the beverage is sold at a vending machine	<ul style="list-style-type: none"> Be clearly visible on the package of the Nutri-Grade beverage through the window of the vending machine, if the window is clear; OR Be clearly displayed next to or in direct relation to the image, text listing or the price tag of the beverage. Not be easily removable, if adhesive labels are used 	
Where the beverage is sold at a consumer-facing automated beverage dispenser for customisable or non-customisable beverages [note: requirements for customisable beverages dispensed from ABDs are new in Dec 2023]	<ul style="list-style-type: none"> Be clearly displayed on or near to the ABD so that it is visible to a prospective consumer; 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 ABD; AND Not be easily removable, if adhesive labels are used 	

Section 5.4 Vector files for the Nutri-Grade mark

72. Please refer to the HPB website (<https://www.hpb.gov.sg/healthy-living/food-beverage/nutri-grade>) to obtain vector files for the Nutri-Grade mark. You may obtain the password to access individual files through this link (<https://form.gov.sg/63e38c60e4e0d60011d34a12>).

Section 6: Advertising Prohibition

Section 6.1 Affected advertisements and media platforms

73. 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 66.
74. Advertisements listed in the *Food Regulations* 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 Nutri-Grade beverage’s name or price or both but does not otherwise promote its sale and is published
 - i. on the corporate website of
 1. A manufacturer, importer, or distributor of a Nutri-Grade beverage that is not freshly prepared; or
 2. **[New in Dec 2023]** A seller of a freshly prepared Nutri-Grade beverage;
 - 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;
 - A labelled* advertisement of a pre-packaged Nutri-Grade beverage, that is published at a physical or online variety shop. 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.
- *The advertisement is required to be labelled with the beverage’s Nutri-Grade mark. 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’.*
- d) **[New in Dec 2023]** An advertisement that is published on a menu, poster, sign or other material labelled in accordance with Regulation 184D(4A) and (4B)^.
- ^These menus, posters, signs or other materials are required to be labelled with a Nutri-Grade mark for Nutri-Grade beverages graded “C” or “D” (refer to Section 5.3).*

A summary of what is prohibited and not prohibited, is in Table 11.

Table 11: 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"> Advertisements that feature beverages graded “D”, whether alone or alongside other products; 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) Advertisements on vending machines and ABDs [new in Dec 2023] 	<ul style="list-style-type: none"> Brand advertisements that do not feature any particular product. Advertisements that promote the sale of Nutri-Grade beverages graded “A”, “B” or “C”. Communications of personal opinion made by an individual for no commercial gain, such as organic user content on social media. 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. 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"> on the corporate website of the manufacturer, importer or retailer (e.g., product catalogue); as part of a product launch event that is not accessible to any member of the general public other than an invited guest; or in the form of a press or media release. An advertisement that is published at the following locations, provided the requirements are met: <ul style="list-style-type: none"> at physical or online variety shop where the pre-packaged Nutri-Grade beverage is sold (note: from Dec 2023, exemptions for POS platforms will be limited to physical and online variety shops for advertisements featuring pre-packaged beverages); at the vending machine if the Nutri-Grade beverage is sold from the same vending machine [exemption to be removed from Dec 2023]; or at the ABD, if the Nutri-Grade beverage is sold from the same ABD [exemption to be removed from Dec 2023]. The act of offering financial or material inducement such as offering discounts, gifts, sponsorships, free samples, donations, tie-in sales, or other promotions. The act of distributing Press Release (PR) kits.

75. 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 12.

Table 12: 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”

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

Section 6.2 Labelling the Nutri-Grade mark on advertisements at physical or online variety shops

76. Advertisements at POS platforms **(note: exemption for POS platforms will be limited to physical and online variety shops from Dec 2023)** that promote the sale of Nutri-Grade beverages in pre-packaged form that are graded “D”, are exempt from the prohibition, provided they are labelled with the Nutri-Grade mark “D” clearly.
77. This labelling requirement does not apply to trade advertisements or informational statements (e.g. name tags or price tags). These are not subject to the prohibition.

78. Table 13 states the requirements for different types of POS materials.

Table 13: Examples of POS materials and their different requirements

POS Platform	Considered advertisement (i.e. must label Nutri-Grade mark if it features a Grade D beverage)	<u>NOT</u> considered advertisement, but mandatory labelling requirements apply (i.e. must label Nutri-Grade mark if it features Grade C/D beverage)	<u>NOT</u> considered advertisement, and mandatory labelling requirements do not apply either (i.e. no requirement to label the Nutri-Grade mark)
Physical variety shops (note: exemption for POS platforms will be limited to advertisements of pre-packaged beverages at physical and online variety shops from Dec 2023)	<ul style="list-style-type: none"> Special product displays (e.g. gondolas, product sampling booths, wobblers, table/ floor/ fridge stickers, standees etc.) Audio messages played in the store 	Product packages of pre-packaged beverages	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"> Wraps, decals on the machine etc. [such POS ads featuring grade D beverages will be prohibited from Dec 2023] 	<ul style="list-style-type: none"> Product packages (if visible through window of machine) Tags indicating the name or price 	
ABDs	<ul style="list-style-type: none"> Wraps, decals on the machine etc. [such POS ads featuring grade D beverages will be prohibited from Dec 2023] 	<ul style="list-style-type: none"> Listings indicating the name or price 	

<p>Online variety shops (e.g. e-commerce site of variety shop)</p> <p>(note: exemption for POS platforms will be limited to advertisements of pre-packaged beverages at physical and online variety shops from Dec 2023)</p>	<ul style="list-style-type: none"> Features that draw undue attention to the product (e.g. banners, pop-ups, main page features, product images used in category listings etc.) 	<p>Materials that inform the sale of a Nutri-Grade beverage –</p> <ul style="list-style-type: none"> contain information about the name and/or image of the Nutri-Grade beverage 	
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- 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. 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'. 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.

Section 7: Concession for Affected Establishments selling Freshly Prepared Nutri-Grade Beverages [New in Dec 2023]

73. At the start, a concession will be provided for individuals and entities operating a smaller food business that involves the sale of a freshly prepared Nutri-Grade beverage. This is in view of the challenges such individuals and entities may face, such as the lack of resources to determine the grading of freshly prepared beverages. We will review this concession over time and adjust appropriately. These individuals and entities will still be **required to comply with the measures for pre-packaged Nutri-Grade beverages and non-customisable beverages dispensed from ABDs** (refer to paragraph 76).

Figure 7: Exemption criteria

An individual or entity* carrying on a **smaller food business** that involves the sale of freshly prepared Nutri-Grade beverage(s), if he or she:

- a) earns a revenue of not more than \$1 million in the latest financial year*, or, if the person carried on the food business for a shorter period than one financial year**, **and**
- b) sells those beverages at fewer than 10 food premises in Singapore, not including any premise used for a primary food production business.

**refers to a person or an entity in a group, where the entity belongs to a group (i.e. 2 or more entities where each entity is either a parent or a subsidiary, or both, of at least one other entity). The combined size of the entities in the group must be considered when determining the annual revenue and number of locations.*

***refers to the period (whether a year or not) for which the audited financial statements (prepared in accordance with the Accounting Standards, or equivalent outside Singapore) or the profit-and-loss statements are made up.*

74. An individual or entity that falls below both the revenue and number of food premises criteria in Figure 7 is **not required to comply with the following requirements for freshly prepared Nutri-Grade beverages** (including customisable beverages dispensed from an ABD):

- i. Grading and providing information that would be required on an NIP for all freshly prepared beverages;
- ii. Labelling freshly prepared beverages graded “C” or “D” on materials that inform its sale or on the customisable ABD itself; and
- iii. Prohibiting advertisements for freshly prepared beverages graded “D”.

75. Where an individual or entity falls below both the revenue and number of food premises criteria,

- i. The individual or entity who sells a freshly prepared beverage, is **not required** to comply with the requirements set out in para 74i and ii;

- ii. The individual or entity who calibrates the ABD for customisable beverages to be able to dispense beverages according to inputs given by a prospective consumer of the beverage, is also not required to comply with the requirements set out in para 74i and ii.
- iii. The individual or entity who publishes, causes to be published, or takes part in the publication of an advertisement used or apparently used to promote the sale of the freshly prepared Nutri-Grade beverage, is not required to comply with para 74iii.

Concession does not apply to pre-packaged beverages and non-customisable beverages from ABDs

76. For the avoidance of doubt, all individuals or entities, regardless of annual revenue or number of food premises, are **required** to comply with the following requirements for **pre-packaged beverages and non-customisable beverages dispensed from ABDs**:

- (i) Grading and providing NIP for all pre-packaged beverages;
- (ii) Grading and providing information that would be required on an NIP, for non-customisable beverages from ABDs;
- (iii) Labelling the front-of-pack of pre-packaged beverages graded “C” or “D”;
- (iv) **Labelling pre-packaged beverages and non-customisable beverages dispensed from ABDs that are graded “C” or “D”, on materials that inform its sale [new in Dec 2023]** or on the ABD itself; and
- (v) Prohibiting advertisements for pre-packaged beverages and non-customisable beverages dispensed from ABDs that are graded “D”.

77. Audit checks will be conducted to monitor compliance with the regulations. If required and upon request, parent and subsidiary entities should provide the relevant records and information, including but not limited to supporting documents for the verification of annual revenue, number of physical locations, and business registration.

Contacts

Questions concerning the labelling and advertising requirements for Nutri-Grade beverages, or feedback related to the improvement of this document may be directed to:

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Glossary

<u>Key term</u>	<u>Definition</u>
Advertisement	<p>As defined by Section 2 of the Sale of Food Act, means any of the following where used or apparently used to promote, directly or indirectly, the sale of food:</p> <ul style="list-style-type: none"> 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), <p>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.</p> <p><i>(refer to Section 6 on advertising prohibitions)</i></p>
Automated Beverage Dispensers (ABDs)	<p>refer to machines that dispense a non-pre-packaged beverage, which is</p> <ul style="list-style-type: none"> - customisable, that is, with an option for a prospective consumer of the beverage to customise the amount of any ingredient in the beverage. This includes machines that dispense customisable bubble tea drinks, freshly squeezed fruit juices, coffee machines, that allow choice of sugar level of creamers, sited in office pantries or hospitals <p>OR</p> <p>refer to machines that dispense a non-pre-packaged beverage, which is</p> <ul style="list-style-type: none"> - non-customisable, that is, according to a pre-fixed formula, with no option for a prospective consumer of the beverage to customise the amount of any ingredient(s) in the beverage. This includes machines that dispense fountain drinks, automated coffee machines, self-service dispensers at cinemas, convenience stores, office pantries.
Consumer-facing ABDs	<p>refer to ABDs that show an image or text listing of what beverage may be dispensed and is placed (a) at or behind a counter in a way that allows a prospective consumer in front of the counter to see the image or text listing, (b) in a way that allows a prospective consumer to dispense a beverage of his or her choice, based on the image or text listing, or (c) in any other way that allows a prospective consumer to see the image or text listing.</p>
Default preparation	<p>refers to a freshly prepared Nutri-Grade beverage that is prepared for a prospective consumer who does not customise the amount of any ingredient in the beverage. <i>(refer to para 31 in Section 3)</i></p>
Free sugar	<p>refers to any monosaccharide and disaccharide added to the beverage, 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).</p>

Freshly prepared	<p>refers to a Nutri-Grade beverage that is</p> <p>(a) prepared by hand at the place or premises where it is sold, or at any place or premises before it is sold online, or</p> <p>(b) for which a prospective consumer may customise the amount of at least one ingredient in the Nutri-Grade beverage.</p> <p>This includes bubble tea, freshly prepared herbal drinks, freshly brewed coffee or tea, freshly squeezed juices, freshly blended smoothies, and non-pre-packaged beverages dispensed from customisable ABDs, with the option to customise the amount of at least one ingredient in the beverage.</p>
Materials that inform its sale	<p>refers to menus, posters, signs or other materials that is used to inform a prospective consumer that the Nutri-Grade beverage is for sale.</p> <p><i>(refer to Section 5.3 for Nutri-Grade mark application requirements)</i></p>
Multipack	A multipack is a pack of several individual pre-packaged units of beverages, which are grouped and packaged for sale as a single item.
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.
Nutri-Grade beverage	<p>refers to any beverage (including any powder or concentrate meant to be reconstituted or diluted with fluids before consumption as a beverage), except (a) a beverage that contains more than 0.5% (v/v) alcohol at 20°C, and (b) a special purpose food.</p> <p><i>(refer to flowchart in Figure 1 and regulation 184A(1) in the Food Regulations for details)</i></p>
Online variety shop	means an online location of sale that sells mainly the variety of things referred to in the definition of “variety shop” (refer to term below)
Pre-packaged	refers to a <u>prepacked Nutri-Grade beverage that is not freshly prepared in this document (for brevity).</u>
Prepacked	as defined in regulation 2(1) of the Food Regulations, means packed or made up in advance ready for sale in a wrapper or container, and where any food packed or made up in a wrapper or container is found on any premises where such food is packed, kept or stored for sale, the food shall be deemed to be prepacked unless the contrary is proved, and it shall not be sufficient proof of the contrary to show that the food had not been labelled in accordance with the provisions of the Food Regulations.

	<p>This includes Ready-to-consume beverages that are packed or made up in advance ready for sale in packages such as bottles, cans, cartons, packet, or other similar container, and any powder or concentration that is meant to be reconstituted or diluted with fluids before consumption as a beverage.</p>
Responsible parties	<p>refers to parties responsible for:</p> <ul style="list-style-type: none"> (a) ensuring that a Nutri-Grade beverage has its NIP made available, a Nutri-Grade beverage is graded, and a Nutri-Grade beverage graded "C" or "D" is labelled with a Nutri-Grade mark. (b) ensuring the accuracy of the NIP information and manufacturer's instructions on how to prepare the beverage, and (c) making and keeping written records to support the nutrient declarations. <p>The responsible parties are set out below, and within the <i>Food Amendment No. 2 Regulations</i>:</p> <ul style="list-style-type: none"> (i) For pre-packaged beverages and beverages dispensed from a non-customisable ABD – Manufacturers, local importers and distributors; (ii) For freshly prepared beverages prepared by hand at a place or premises – its sellers; (iii) For freshly prepared beverages sold from a customisable ABD – The person who calibrates the machine to be able to dispense beverages according to inputs given by a prospective consumer of the beverage. <p><i>(refer to Section 3 Table 2 and Section 4 Table 6 on areas of responsibility)</i></p>
Sale / sell / sold	<p>refers to carrying on the activities within regulation 2E of the Sale of Food Act 1973. In the context of this industry guidance, it refers to the provision of beverages to consumers within a "specified setting", with or without a financial transaction and encompasses retail settings (e.g. F&B, catering, vending machines, variety shops) and non-retail settings (e.g. B2B, hotels, workplaces, education institutions, healthcare institutions, transportation, childcare facilities and detention facilities).</p>
Specified settings	<p>refers to the settings for sale of any Nutri-Grade beverage:</p> <ul style="list-style-type: none"> (a) sale of the Nutri-Grade beverage by a retail food business, from an automated beverage dispenser or from a vending machine; (b) supply of the Nutri-Grade beverage under a contract (whether or not the contract is made with the consumer of the beverage), together with any accommodation, service or entertainment, in consideration of an inclusive charge for the Nutri-Grade beverage and the accommodation, service or entertainment; (c) supply of the Nutri-Grade beverage (whether or not for consideration) in the course of providing services to patients in hospitals, hospices and other residential care facilities like nursing homes; to children or other individuals in the care or custody of the supplier by virtue of any Act; or to prisoners or inmates in prisons or other places for the detention of individuals under any Act;

	(d) supply of the Nutri-Grade beverage as part of providing amenities at a place of work.
Total sugar	refers to any monosaccharide and disaccharide in a beverage. This includes novel sugars like allulose and isomaltulose.
Variety pack	A variety pack is a pack of several different types of individual pre-packaged units of beverages, which are grouped and packaged for sale as a single item.
Variety shop	means a convenience store, grocery shop, supermarket or other establishment however named that sells mainly a variety of food, small household items, toiletries, and other small consumer goods.