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Frequently Asked Questions for Scope of Products subject to the additional measures

A. Which products are considered Nutri-Grade beverages?

Table 1 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 1: Commonly queried products and classifications

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

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

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

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Beverages that can be used as meal replacement	<ul style="list-style-type: none"> Partial meal replacement (e.g. nutritional shakes) 	Yes; <ul style="list-style-type: none"> Not covered under the exclusion stated in Paragraph 8(d) and thus are Nutri-Grade beverages
	<ul style="list-style-type: none"> Total daily meal replacement (e.g. those for post-surgery use) 	No; <ul style="list-style-type: none"> Covered under the exclusion stated in Paragraph 8(d) and thus not a Nutri-Grade beverage
Beverages portioned out from pre-packaged beverages	<ul style="list-style-type: none"> Drinks that are portioned out at the food establishment from a bulk or retail packaging without addition of other drinks or ingredients (e.g. canned drink supplied in bulk or retail packaging to the food establishment, and which is portioned into individual cups or bottles onsite) 	Yes; <ul style="list-style-type: none"> Intended for consumption as a beverage Considered as pre-packaged, and not freshly prepared
FRESHLY PREPARED [New in Dec 2023] (also includes any of the above existing Nutri-Grade beverages, but in freshly prepared form)		
Freshly prepared beverages made in the premise of a food establishment for immediate consumption	<ul style="list-style-type: none"> Barley or ice lemon tea or other drinks made onsite and poured into storage containers or individual cups and sealed ahead of sale Freshly prepared drinks that are prepared using powders/concentrates and served to consumers at the food establishment after reconstitution (e.g. hot coffee made using 3-in-1 powder) Other drinks made at central food establishment and distributed to other establishments for sale by the same food business 	Yes; <ul style="list-style-type: none"> Intended for consumption as a freshly prepared Nutri-Grade beverage

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	<p>operator (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)</p> <ul style="list-style-type: none"> Freshly prepared drinks made in the premise of a food 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 by a customisable ABD	<ul style="list-style-type: none"> Coffee/tea with customisation option that allows consumer to select the amount of sugar or milk or creamer used on the machine Freshly squeezed juices with fresh fruits stored in the machine Bubble tea with customisation options on the machine 	<p>Yes;</p> <ul style="list-style-type: none"> Intended for consumption as a freshly prepared Nutri-Grade beverage

B. Which products qualify as “follow-up formula”, 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]. This includes:

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- A product intended for consumption by children above 12 months (without an upper age limit)¹; and
- A product intended for consumption by children between the ages of 1 to 10 years.

¹ Follow-up formula for infants from the 6th month or older would still be regarded as infant formula under Regulation 252 of the Food Regulations.

Frequently Asked Questions for Nutrition Information Panel (NIP)

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) for pre-packaged beverages, beverages dispensed from non-customisable ABDs and freshly prepared Nutri-Grade beverages (including those dispensed from customisable ABDs).
- For toppings listed on materials that inform its sale or provided with a customisable ABD, only the total sugar content of one chosen beverage from the establishment's offerings with the topping, as well as the total sugar content of the same chosen beverage without the topping, needs to be made available either in a physical or electronic record to any person who wishes to view the information (refer to [Worked Example K](#)).
- In addition, supplementing the mandatory nutrient declaration with information on the amounts of supplementary nutrients (e.g. lactose and/or galactose), is allowed on a voluntary basis.

B. Do all Nutri-Grade beverages, including freshly prepared, need to be labelled with a NIP?

Since 30 Dec 2022, it is mandatory for pre-packaged Nutri-Grade beverages sold for retail to be labelled with a NIP. From Dec 2023, this will be extended to pre-packaged Nutri-Grade beverages intended for sale in specified non-retail settings. Freshly prepared beverages (including those dispensed from customisable ABDs) will also need to ensure that information related to its product's sugar and saturated fat content is made available either through a physical or electronic record (i.e. NIP labelling on the cup is not required).

C. 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.

D. Does total fat include cholesterol?

No.

E. Does total carbohydrate include dietary fibre?

No.

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. Regarding chemical analysis to obtain nutrient values, how many samples of each product are required to be analysed?

The responsible parties are responsible for determining the variability of their product(s) and the appropriate number of samples needed to provide accurate nutrient data. Please refer to Section 3.3, Para 37 on other methods of analysis.

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.

Frequently Asked Questions for Nutri-Grade mark

A. Non-retail food establishments (e.g. hospitals) may engage external retail food establishments to sell food. In such cases, who should be responsible for compliance with the labelling requirements?

- The person who provides the menu or materials that inform the sale of the Nutri-Grade beverage (i.e. the person who provides the information that guides the creation of the listing and/or materials) should ensure that such materials comply with the measures (when they come into effect in Dec 2023). For example:
 - A hospital has various retail food establishments operating within its premises that sell beverages using materials that inform its sale, e.g., menu.
 - The retail food establishments must ensure that the beverages listed within these materials meet the labelling requirements.
 - A hospital organizes an event and engages a caterer to provide food during the event. The caterer provides a menu to the hospital prior to the event for it to select its food and beverage options. The catered food comes with individual signages from the caterer.
 - The caterer must ensure that the menu sent to the hospital prior to the event and individual signages meet the labelling requirements.
 - A hospital serves caterer-supplied meals to its patients and provides patients with a menu to choose their meals from.
 - The hospital must ensure that the menu meets the labelling requirements.

B. For Nutri-Grade beverages sold online, must every online material that informs the sale of a Nutri-Grade beverage be labelled with the Nutri-Grade mark?

- Yes. For Nutri-Grade beverages sold online, it is required for the Nutri-Grade mark to be labelled next to or in direct relation to online images or text listings of the Nutri-Grade beverage.

C. Do all Nutri-Grade beverages graded C or D need to be labelled with a Nutri-Grade mark on materials that inform its sale?

- Yes. This includes:
 - Nutri-Grade beverages in pre-packaged and freshly prepared form, and beverages from customisable and non-customisable automated beverage dispensers;
 - Standard and seasonal items;
 - Repeated mentions of the same beverage in the same material;
 - Beverages mentioned as part of a set menu; and

Generic beverage items (e.g. “Canned drinks”) – grading and labelling will be based on the least healthy beverage (poorest grade and highest sugar beverage) offered under this generic item.

D. Some materials that inform sale of Nutri-Grade beverages (e.g. menus) combine hot and iced versions of the same beverage as a single beverage item. If hot and iced versions of the same beverage are of different grades, how do I apply the Nutri-Grade mark?

Please refer to the common scenarios and applications, below.

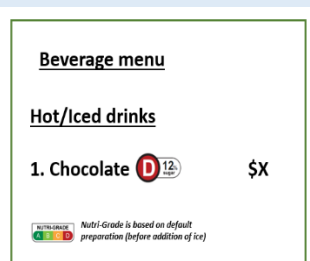
Scenario:

1) Hot and iced versions of the same beverage are listed *as different beverage items* on the menu. Hot version is graded “C” while iced version is graded “D” due to different recipes.



- Each Grade C or D beverage listed on the materials needs to have a Nutri-Grade mark.
- The Nutri-Grade mark is based on each beverage’s reference variant.
- The statement to describe the basis of grading should mention the reference variant. As they are listed as different beverage items, the reference variant for each drink is its default preparation.
- Since the hot and iced version have different recipes, the statement for hot drinks can be “Nutri-Grade is based on default preparation”, while the statement for iced drinks can be “Nutri-Grade is based on default preparation (before addition of ice)”.

2) Hot and iced versions of the same beverage are listed *as a single beverage item* on the menu.



- Each Grade C or D beverage listed on the materials needs to have a Nutri-Grade mark.
- In this case, since both hot and iced versions are listed as a single beverage item, the Nutri-Grade mark for this beverage item should be based on the **reference variant with the poorer grade**, i.e., iced version grade “D”.
- The statement to describe the basis of grading should mention the reference variant. For example, if the reference variant for this listed beverage item is iced version, the beverage statement can be “Nutri-Grade is based on default preparation (before addition of ice)”.

E. For freshly prepared beverages, assuming they are graded C or D and must be labelled, must I always include 'hot' or 'iced' version in the statement regarding the basis of grading?

No, it is not necessary for the statement to indicate 'hot' or 'iced', as long as it describes the customised beverage that the Nutri-Grade mark is based on (e.g. Nutri-Grade is based on 100% sugar, or Nutri-Grade is based on full cream milk, or Nutri-Grade is based on default preparation).

However, if 'hot' or 'iced' is combined as a single listed beverage item on the menu and there are differences in the preparations which result in different grades, the Nutri-Grade mark and the statement should be based on the reference variant with the poorer grade (see scenario 2 in question D above). , If there is more than one customised preparation with the poorer grade, it would be based on the customised preparation with the highest percentage of sugar content per 100ml.

F. For freshly prepared Nutri-Grade beverages containing ice, should ice be factored in for grading and labelling?

For freshly prepared beverages served with ice (e.g., coffee with added ice cubes), ice is *excluded* from the grading of the Nutri-Grade beverages. Grading based on the beverage recipe before dilution with ice, will allow consistency in grading across all Nutri-Grade beverages and maintain a level playing field across the industry. This will also spur industry reformulation of the more concentrated, base beverage recipe, regardless of subsequent dilution from the amount of ice added during beverage preparation.

For blended ice beverages (e.g., blended ice frappés or blended ice smoothies), where ice is incorporated into the preparation, rather than being added to the beverage separately, ice serves as the main medium to form the beverage with minimal addition of other fluids. We note that once the ice is blended in, it cannot be removed due to practical limitations. Hence, ice can be factored into the grading.

G. For freshly prepared beverages, how should the statement regarding the basis of grading be phrased, if the beverages listed within the materials that inform its sale have different reference variants?

- If the material lists a combination of beverages with different reference variants,
 - The basis of labelling for each respective type of beverage must be indicated on the materials as statement(s) at least once
 - The statement(s) should make clear which beverages it/they refer(s) to. Please refer to Section 4, Figure 4 or the Usage guide for examples of such statements.
 - If different types of beverages are listed on separate pages/ panels, the statement regarding the basis of grading on that specific

page/panel can refer specifically to the type of beverage on that page/board. For example, if drinks with default preparation are listed in its own panel, the statement for basis of grading can refer to the default preparation.

- Alternatively, the full statement (covering all types of beverages listed on the material) can be repeated across the pages of the material.
- For example:
 - If a bubble tea menu has some beverages that must be customised and some that have default preparations, the statement could state:

“Nutri-Grade is based on 100% sugar.

For drinks without the option to customise sugar level, Nutri-Grade is based on default preparation.”

H. My freshly prepared beverages come in different sizes. Which size do I analyse for the purpose of the grading/ labelling, and must I indicate this within the material that informs its sale, as part of the statement regarding the basis of the grading?

Since the grading (i.e. the amount of sugar and saturated fat content per 100ml) will be the same across different sizes of the same beverage, only 1 beverage size (of all possible sizes listed on the material) needs to be analysed. Beverages listed on a menu should be consistently graded based on one size (e.g. consistently based on small, regular or large cup so as to reduce variability to a minimum). The beverage size used does not need to be indicated within the statement.

I. How should I grade and label my beverages on an online ordering platform, where there are customisation options?

Each listing of the Nutri-Grade beverage (on an online menu of the ordering platform) must be labelled with a Nutri-Grade mark, if the beverage’s grade is “C” or “D”.

- a. If there is only one listing provided for a beverage, the Nutri-Grade mark displayed on the listing shall be based on the default preparation of the beverage. If there is no default preparation, then the Nutri-Grade mark displayed should be based on the customised preparation of the beverage with the poorest grade. If there is more than one preparation in the poorest grade, the grading will be based on the preparation with the poorest grade and highest percentage of sugar content per 100ml.
- b. If the beverage is displayed with each customisation option listed separately, the Nutri-Grade mark should be displayed next to or in direct relation to each listed option that is graded “C” or “D”, e.g., for different Kopi options listed, each option that is graded “C” or “D” must be labelled with the mark.

If the online ordering platform does not allow the Nutri-Grade mark to be displayed next to or in direct relation to each customisation option, the industry can either (i) consider other ways of listing these different Kopi options

individually so that the Nutri-Grade mark can be displayed for each option, taking into consideration the platform's specific technological capabilities and limitations., or (ii) display one Nutri-Grade mark on the listing, based on the customisation with the poorest grade (as customers have to choose a customisation option and there is no default preparation).

J. My online platform does not allow me to display the sugar declaration for toppings mark. Can I indicate it in text instead beside the topping listed?

We recognise the constraints in toppings listed on digital menus within online and app platforms and are amenable to an alternative text variant for sugar declaration of toppings, as long as the key components of the Sugar Declaration for Toppings mark are reflected (i.e., the incremental amount of sugar from the toppings, reflected in terms of % per 100g of toppings). Please refer to the "Usage guide for graphic applications" for illustrated example.

Frequently Asked Questions for Advertising Prohibition

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

Table 3: Commonly queried types of engagements and their classifications

Engagement	Classification	Remarks
Influencer post on social media	Depends	<ul style="list-style-type: none"> 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”. However, posts that are made by the individual for no commercial gain are <u>not</u> subject to the prohibition.
Product placements	Depends	<ul style="list-style-type: none"> 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. 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.

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Products listed on company's own website/ media	Depends	<ul style="list-style-type: none"> 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. 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. 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.
Tours or visits at company's premises	Depends	<ul style="list-style-type: none"> Tours or visits around the premises are not subject to the prohibition. However, the conduct of presentations and advertisements of price promotions used for purposes of promoting product sales to consumers at the tour or visit may be subject to the prohibition if they feature Nutri-Grade beverage(s) graded "D".

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”.

E. How do I distinguish which materials inform sale of Nutri-Grade beverages (require labelling of beverages graded “C” or “D”) and which materials are advertisements (require prohibition of advertisements of beverages graded “D”)?

- In the context of the additional measures, “advertisements” to refer to all materials that (a) do not fall under the scope of “materials that inform sale of Nutri-Grade beverage” and (b) promote the sale of beverages.

Table 3: Distinction of materials that inform sale of Nutri-Grade beverage & advertisement, in common settings

Setting	Materials that inform sale of beverage <i>Mandatory labelling for beverages graded “C” or “D”</i>	Advertisement <i>Ad prohibition for beverages graded “D”</i>
Physical food establishment	Materials that contain the name and/or image of beverages, found within the rental/leased/purchased space of physical food establishments, and that can be seen by a prospective purchaser or consumer	Materials* that contain the name and/or image of beverages found outside the rental/leased/purchased space of physical food establishments <ul style="list-style-type: none"> • E.g. poster outside entrance
Online location of sale, for food establishment	Materials that contain the name and/or image of beverages, found within the online locations of sale that transact sales of beverages from a particular food establishment	Materials* that contain the name and/or image of beverages, found outside the online locations of sale that transact sales of beverages from a particular food establishment <ul style="list-style-type: none"> • E.g. digital banner on the home page of a food delivery app that consolidates orders across merchants
Variety shops	NIL <i>Note: Under Food (Amendment No. 2) Regulations, with effect from 30 Dec 2022, packages of beverages graded C or D are required to be labelled with the Nutri-Grade mark</i>	Materials* that contain the name and/or image of beverages (other than the product packaging itself) found within supermarkets/grocery shops/convenience stores or other establishments however named, that sells mainly a variety

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		of food, small household items, toiletries, and other small consumer goods E.g. shelf talker, wobblers
Online location of sale, for variety shops	NIL <i>Note: Under Food (Amendment No. 2) Regulations, with effect from 30 Dec 2022, an image of the Nutri-Grade mark must be displayed next to or in direct relation to online image or text listings of beverages graded C or D at online locations of sale. Please see grey box below.</i>	Materials* that contain the name and/or image of beverages, found outside the online locations of sale that transact sales of beverages from a particular variety shop (refer to term above) E.g. digital banner on the home page of an e-commerce app that consolidates orders across merchants
Others	Materials that contain the name and/or image of beverages used to present offerings from retail and non-retail food businesses	Other materials* that contain the name and/or image of beverages across all media platforms including broadcast, cinema, print, out-of-home, on-ground, online, mobile E.g. flyers distributed to mailboxes, direct emailers, bus stop advertisements

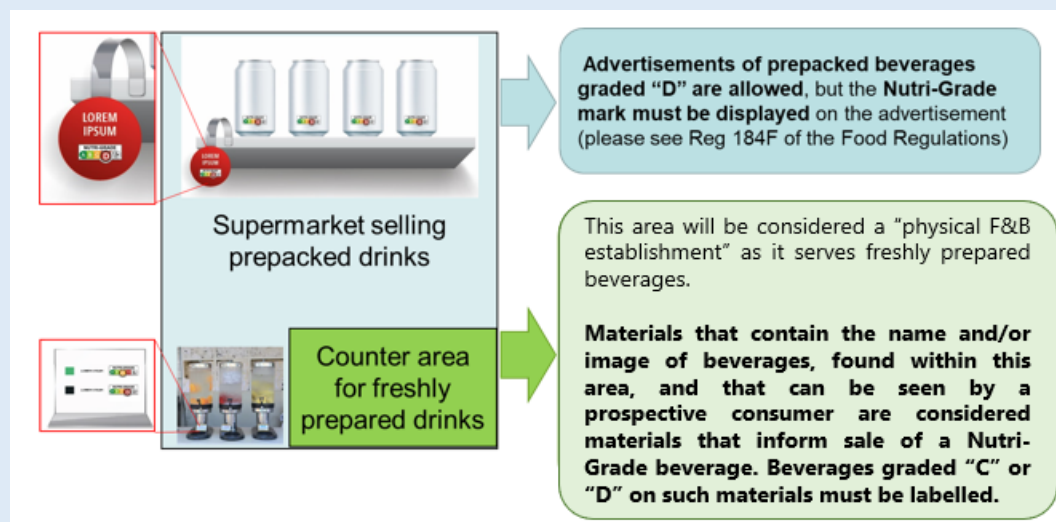
*Provided that these materials promote the sale of beverages

F. Can establishments showcase Grade D freshly prepared beverages on their own media (e.g. websites, social media page, mobile apps)?

- **If the “own media” is not an online location of sale**, yes, establishments can state the name and price of beverages, including Grade D beverages.
- However, these contents should not promote the Grade D beverage, such as through using content or features that bring undue attention to Grade D beverages. Examples (prohibited) are:
 - Banner
 - Partial listing of products
 - Pop-up/ outline
- **If the “own media” is an online location of sale**, materials within it that contain the name and/or image of beverages would be considered as a material that informs the sale of a Nutri-Grade beverage, and Grade C or D beverages must be labelled with the Nutri-Grade mark.

G. I run a supermarket with a small section for freshly prepared beverages, and currently advertise pre-packaged and freshly prepared beverages that are graded “D”. Are all of these advertisements prohibited?

Please refer to the below example and explanation on the requirements.



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Frequently Asked Questions for Concession of Affected Establishments selling Freshly Prepared Beverages

A. How are the revenue and location numbers determined for non-retail establishments?

For non-retail establishments, the revenue would be determined based on the overall annual revenue (by financial year) of the entity that owns the non-retail food establishment, and not only the revenue gained from the provision of retail food business services.

The location number would be determined based on the number of food premises of the entity from which beverages are sold, not including any premise that is used for primary food production only (e.g., storage, packing).