

General labelling requirements for prepacked food

Consultation paper, 15 October 2020

Please respond to the questions in this consultation paper using the Response Sheet provided in **Annex I**

By 20 November 2020

Note: Only one response per Company or Organisation is permitted

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INTRODUCTION

- i. SFA would like to seek views from food business operators selling prepacked food products to consumers in retail markets including online stores in Singapore, on the proposed changes to the labelling requirements for prepacked food.
- ii. Food labels and advertisement are direct means for sellers to communicate product information to buyers. Food label also allows the consumers to make safe and well-informed choices about the food they consume.
- iii. SFA is reviewing the labelling requirements of prepacked food products to better facilitate the traceability and the import and export of prepacked food, as well as to enable consumers make informed choices at point of purchase and before consuming the prepacked food.
- iv. When reviewing labelling requirements for prepacked food products sold in Singapore, SFA takes reference from international standards established by the Codex Alimentarius Commission¹ (Codex), specifically the following:
 - a. General Standard for the labelling of prepackaged foods (CXS 1-1985) (hereafter known as “GSLPF”)
 - b. Codex General Guidelines on Claims (CAC/GL 1-1979 (CXG 1-1979))
 - c. Codex Standard for Foods for Special Dietary Use for Persons Intolerant to Gluten (CXS 118-1979)SFA also takes into consideration factors like Singapore’s local food consumption patterns and local food trade (i.e. importing country with small market).
- v. As part of the review, SFA proposes to amend the labelling requirements for prepacked food in following regulations under the Singapore [Food Regulations](#) (*hereafter known as “SFR”*).
 - a. Regulation 5 – General requirements for labelling
 - b. Regulation 6 – Exemptions from regulation 5
 - c. Regulation 9 – Prohibition on false or misleading statements, etc., on labels
 - d. Regulation 9B – Limitations on making particular statements or claims on labels
- vi. The labelling requirements under the SFR are applied on prepacked food products for sale in Singapore. This includes prepacked food products sold directly to consumers but does not apply to food that are weighed, counted or measured in the presence of the purchaser and food that are loosely packed in the retailer’s premises. It also does not apply to prepacked food products packed in non-retail containers that are supplied to food businesses for further use.
- vii. The following table summarises the types of prepacked food products that is within the scope of this consultation.

¹ The Codex Alimentarius Commission is the international food standards body established by the Food and Agriculture Organization, and the World Health Organization. Codex standards and texts aim at protecting consumers’ health and ensuring fair practices in the food trade. The standards are developed based on consensus from its member countries and observers (including consumer groups), with advice from scientific experts. The standards are recognised as reference standards for international trade under the World Trade Organization’s Agreement on Sanitary and Phytosanitary measures (SPS Agreement) and the Agreement on Technical Barriers to Trade (TBT). WTO members who wish to apply stricter food safety measures than those set by Codex are required to justify these measures.

Types of prepacked food products	Within scope of consultation?
a. Prepacked food products sold directly to consumers (including brick-and-mortar shops like supermarkets, minimarts, and online platforms etc)	Yes
b. Food sold loosely or a packed in the presence of the purchaser (for example, food which are packed in accordance to purchasers' instructions)	No
c. Takeaway food which are prepared upon purchasers' order or instructions (including those prepared in food stalls, restaurants and those ordered online)	No
d. Prepacked food products that are meant for supply to food establishments for further manufacturing / use i.e. food packed in non-retail containers not meant for direct sale to consumers	No

- viii. This consultation paper is divided into 4 parts (Parts A, B, C and D), with 9 questions. SFA invites views and comments on the proposed amendments to the SFR on general labelling requirements for prepacked food products. Please provide your response to the consultation paper using the response sheet in **Annex I**.
- ix. All submissions should be clearly and concisely written and should provide a reasoned explanation for any proposed revisions. Submission must reach SFA **no later than 6.00pm, 20 November 2020** through email at: neo_mui_lee@sfa.gov.sg; tan_yi_ling@sfa.gov.sg.

PART A: REGULATION 5 OF THE FOOD REGULATIONS

1. Regulation 5(1) to (3) of the SFR requires every prepacked food product to be labelled with all information required under the said Regulations, in a prominent position and clear legible manner. The information required is set out in Regulation 5(4) of the SFR as below.

Information to be declared under Regulation 5 of the SFR	
Regulation	Information
Regulation 5(4)(a)	Name of food
Regulation 5(4)(b)	List of ingredients
Regulation 5(4)(c)	Specify the addition of the colouring “tartrazine”
Regulation 5(4)(d)	Net quantity of food including drained weight
Regulation 5(4)(e)	<ul style="list-style-type: none"> Name and address of the manufacturer, packer, or local vendor for local food; local importer, distributor or agent for imported food Name of the country of origin for imported food
Regulation 5(4)(ea)	Declaration of foods and ingredients that are known to cause hypersensitivity to individuals
Regulation 5(4)(f)	Advisory statement for food containing aspartame (i.e. “Phenylketonurics: contains phenylalanine”)

(i) General information to be included in the label

2. Further to the information to be labelled as listed in paragraph 1, SFA proposes to require the declaration of the following information as part of the general labelling requirements for prepacked food with the respective rationale tabulated as follows. The proposal is also aligned with the recommendations by Codex.

Information	Description	Rationale
a. Lot identification	Each container shall be embossed or otherwise permanently marked to identify the producing factory or the particular lot.	The lot identification, or sometimes known as the batch code, would serve to help businesses and consumers identify the exact batch of products, which is especially important during a food recall.
b. Instructions for use	Instructions to prepare the product, which is to be included, where applicable.	The instructions for use of the product (for example how to cook or reconstitute the food), would ensure correct utilisation of the food to minimise food safety incidences due to mishandling of the food.

Question 1: Do you agree to mandate the declaration of the lot identification and instruction for use on prepacked food products?
<input type="checkbox"/> Yes <input type="checkbox"/> No
If you are not agreeable to the proposal, please provide reason(s) for your answer.

3. Regulation 5(6) of the SFR requires the name of the food, the statement of ingredients (including declaration of tartrazine and ingredients known to cause hypersensitivity), and net quantity of the food to be printed in letters not less than 1.5mm in height. In addition, Regulation 5(7) sets provision for food in small packaging to be labelled in a reduced size that is clearly legible.
4. SFA proposes to remove the requirement under Regulation 5(6) of the SFR to specify a minimum font size for the information to be declared. This would provide flexibility for food businesses to present the information on the label. We would retain the general principle that the information to be declared must be clearly legible.



Question 2: Do you agree to remove the requirements under Regulation 5(6) on minimum font size in the labelling requirements of prepacked food?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If you are not agreeable to the proposal, please provide reason(s) for your answer.	

5. SFA proposes for online platforms based in Singapore to provide the information listed in (a) – (f) below, at point of sale. The information can be declared on the online platform or presented in the form of a photo of the product label that is clearly legible. The requirement would enable consumers make informed food choices at point of purchase.
 - a. Name of food
 - b. List of ingredients (including the declaration of tartrazine and food known to cause hypersensitivity)
 - c. Net contents and drained weight
 - d. Name and address of the Singapore manufacturer, packer, distributor, importer, export or vendor of the food
 - e. Name of the country of origin
 - f. Instruction for use

Question 3: Do you agree for the food made available for sale through online platforms to provide the following information?	
<ol style="list-style-type: none"> a. Name of food b. List of ingredients (including the declaration of tartrazine and food known to cause hypersensitivity) c. Net contents and drained weight d. Name and address of the Singapore manufacturer, packer, distributor, importer, export or vendor of the food e. Name of the country of origin f. Instruction for use 	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If you are not agreeable to the proposal, please list down the specific labelling requirement (s) and provide reason(s) for your answer.	

(ii) Statement of ingredients

6. Regulation 5(4)(b) of the SFR requires prepacked food to be labelled with a statement of ingredients, listing all ingredients (including additives) used in the food in descending order of the proportion by weight in which they are present. The ingredients must be labelled with the appropriate designation that is specific to reflect the true nature of the ingredient. Only generic terms listed under the First Schedule of the SFR may be used.
7. SFA proposes to amend Regulation 5(4)(b) on statement of ingredients, as tabulated in Column 2 of the Table below. The purpose of the proposed amendments is to provide better clarity for the declaration of the statement of ingredients. The proposal takes into consideration the recommendations from Codex.

S/no.	Column 1	Column 2
	Current Regulation 5(4)(b) of the SFR	Proposed amendments to Regulation 5(4)(b) ² of the SFR
a.	The appropriate designation of each ingredient in the case of food consisting of two or more ingredients and unless the quantity or proportion of each ingredient is specified, the ingredients shall be specified in descending order of the proportion by weight in which they are present.	<p>SFA proposes to amend the text as proposed in blue, for clarity:</p> <p>“The appropriate designation of each ingredient in the case of food consisting of two or more ingredients and unless the quantity or proportion of each ingredient is specified, the ingredients shall be specified in descending order of the proportions by the ingoing weight (m/m) at the time of the manufacture of the food.</p> <p>The list of ingredients shall be headed or preceded by an appropriate title which consists of or includes the term ‘ingredient’.”</p>
b.	<p>For the purpose of this subparagraph —</p> <p>(i) “appropriate designation” means a name or description, being a specific and not a generic name or description, which shall indicate to a prospective purchaser the true nature of the ingredient, constituent or product to which it is applied except as provided in the First Schedule;</p> <p> First Schedule of the Food Regulation</p>	<p>SFA proposes to combine the list of general terms under the First Schedule of the SFR with the list of general class names under the GSLPF.</p> <p>Consequently, Regulation 6(4)³ of the SFR will be revoked.</p> <p>The combined list of general terms is as attached.</p> <p> Proposed list of permitted general te</p>

² Please note that the actual legal text under the Food Regulations will be drafted by the Attorney-General’s Chambers. Respondents should comment based on agreement with the principles.

³ Regulation 6(4) of the SFR exempts infant formula from declaring the specific names of additives which are permitted for use in infant formula.

S/no.	Column 1	Column 2
	Current Regulation 5(4)(b) of the SFR	Proposed amendments to Regulation 5(4)(b) ² of the SFR
c.	(ii) it shall not be necessary to state that the food contains water; and	<p>SFA proposes to replace text in Regulation 5(4)(b)(ii) under the SFR, with the following text in blue, to require the declaration of water, when forming an ingredient in the food. This provides clarity on the ingredients used in manufacturing of the food:</p> <p>“Added water shall be declared in the list of ingredients except when the water forms part of an ingredient such as brine, syrup or broth used in a compound food and declared as such in the list of ingredients. Water or other volatile ingredients evaporated in the course of manufacture need not be declared.”</p>
d.	(iii) where a food contains an ingredient which is made from two or more constituents, the appropriate designations of those constituents shall be so specified and it shall not be necessary to specify the appropriate designation of that ingredient;	<p>SFA proposes to include the text in blue, to allow food additives carried over from a standardised ingredient but no longer serve technological function to the final food product, to be exempted from declaration under the statement of ingredients:</p> <p>“where a food contains an ingredient, which is made from two or more constituents, the appropriate designations of those constituents shall be so specified and it shall not be necessary to specify the appropriate designation of that ingredient;</p> <p>where a compound ingredient (for which a name has been established in a Codex standard or under the Food Regulations) constitutes less than 5% of the food, the ingredients, other than food additives which serve a technological function in the finished product, need not be declared.”</p>
e.		<p>[New] SFA proposes to include the following text in blue, to require the declaration of presence ingredients obtained through biotechnology of an allergen (listed as food and ingredients known to cause hypersensitivity) for</p>

S/no.	Column 1	Column 2
	Current Regulation 5(4)(b) of the SFR	Proposed amendments to Regulation 5(4)(b) ² of the SFR
		<p>clarity.⁴ This is in line with the current guidance from SFA on the declaration ingredients that are known to cause hypersensitivity.</p> <p>“The presence of an allergen, in any food or food ingredients obtained through biotechnology, that would cause hypersensitivity to individuals shall be declared.</p> <p>When it is not possible to provide adequate information on the presence of an allergen through labelling, the food containing the allergen should not be marketed.”</p>
f.		<p>[New] SFA proposes to include the following text in blue. This provides clarity that food additives, with the exception of processing aids, carried over from an ingredient used in the food product must be disclosed under the statement of ingredients.⁵</p> <p>“A food additive carried over into a food in a significant quantity or in an amount sufficient to perform a technological function in that food as a result of the use of raw materials or other ingredients in which the additive was used shall be included in the list of ingredients.</p> <p>A food additive carried over into foods at a level less than that required to achieve a technological function, and processing aids, are exempted from declaration in the list of ingredients. The exemption does not apply to food additives and processing aids listed as food that cause hypersensitivity to individuals.”</p>

⁴ This is not specified under the SFR. However, based on Regulation 5(4)(ea) of the SFR, it would be a requirement for food containing ingredients that may cause hypersensitivity to individuals to be declared under the statement of ingredients.

⁵ Regulation 5(4)(b)(iii) would require food additives that are carried over from the ingredients used in the final food to be declared under the statement of ingredients. As for the declaration of processing aids, SFA currently adopts the recommendation made under the GSLPF.

8. Please provide your response for the proposed amendments as tabulated in Column 2 in paragraph 7 above.

<p>Question 4a: Do you agree to declare the ingredients in descending order based on the ingoing weight at the time of manufacture, and for the statement of ingredients to be preceded by an appropriate title (e.g. "Ingredient") as proposed under Column 2 of S/no. (a) in the Table of paragraph 7?</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>If you are not agreeable to the proposal, please provide reason(s) for your answer.</p>
<p>Question 4b: Do you agree to combine the list of general terms under the First Schedule of the SFR with the list of general class names under the GSLPF as proposed in Column 2 of S/no. (b) in the Table of paragraph 7, for the list of general terms?</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>If you are not agreeable to the proposal, please provide reason(s) for your answer.</p>
<p>Question 4c: Do you agree to replace the text in Regulation 5(4)(b)(ii) under SFR, to declare the addition of water during manufacturing of a food, in Column 2 of S/no. (c) in the Table of paragraph 7?</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>If you are not agreeable to the proposal, please provide reason(s) for your answer.</p>
<p>Question 4d: Do you agree that the breakdown constituents of a compound ingredient constituting less than 5% of the food do not have to be declared provided that:</p> <ul style="list-style-type: none"> (i) the compound ingredient has an established standard in Codex standard or the Food Regulations; and (ii) the breakdown constituent is not a food additive that serves a technological function in the finished product, <p>in Column 2 of S/no. (d) in the Table of paragraph 7 above to align with GSLPF?</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>If you are not agreeable to the proposal, please provide reason(s) for your answer.</p>
<p>Question 4e: Do you agree to require the declaration of the presence of ingredients obtained through biotechnology of an allergen⁶, in Column 2 of S/no. (e) in the Table of paragraph 7?</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>If you are not agreeable to the proposal, please provide reason(s) for your answer.</p>
<p>Question 4f: Do you agree to include the text on the declaration of carried over food additives and processing aids, in Column 2 of S/no. (f) in the Table of paragraph 7?</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>If you are not agreeable to the proposal, please provide reason(s) for your answer.</p>

⁶ Do note that this is not a requirement to declare that the food is derived or contains ingredients that are derived from modern biotechnology. The purpose of this text is to disclose the potential presence ingredients that may cause hypersensitivity to individuals when the ingredient is used as a source.

(iii) Name of the country of origin⁷ for imported food

9. Regulation 5(4)(e) of the SFR requires only imported food to be declared with the name of the country of origin. SFA proposes to mandate the declaration of the name of country of origin for all prepacked foods sold in Singapore. This includes prepacked food that are both imported and locally manufactured/processed. The proposal is to ensure traceability and to minimise ambiguity and disparity in the need to declare the name of the country of origin.

Question 5: Do you agree to mandate the declaration of country of origin for both imported and locally manufactured food?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If you are not agreeable to the proposal, please provide reason(s) for your answer.	

10. A food may undergo different processes in multiple countries. In Singapore’s context, the “country of origin” would be country where the handling of the food last took place (i.e. where the food is packed into primary packaging). The current SFR only requires country of origin to be declared but did not require for the name of the country of origin to be accompanied by appropriate qualifiers like “Product of” / “Made in” / “Bottled in” / “Packed in”, resulting in some consumers to be confused on the origin of the food.
11. SFA proposes to require the name of the country of origin for the food to be accompanied by appropriate qualifiers, to add clarity to consumers on the processes that food undergoes, in the country of origin (in this case, the last processing place of the food) and facilitate traceability of the product.

Question 6: Do you agree to require the name of the country of origin to be accompanied by appropriate qualifiers?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If you are not agreeable to the proposal, please provide reason(s) for your answer.	

- End of Part A -

⁷ The labelling of country of origin for the prepacked food should not be confused with [Certificates of Origin issued by the Singapore Customs](#).

PART B: REGULATION 6 OF THE FOOD REGULATIONS

12. Regulation 6 of the SFR exempts certain prepacked food products from the general labelling requirements under Regulation 5 (see below).

Regulation 6 of the SFR
<p>(1) Regulation 5 shall not apply to —</p> <ul style="list-style-type: none"> (a) food weighed, counted or measured in the presence of the purchaser; and (b) food which is loosely packed in the retailer's premises. <p>(2) Regulation 5, except paragraph (4)(c), (d) and (e) shall not apply to bread which is loosely packed in the retailer's premises.</p> <p>(3) Regulation 5(4)(b) shall not apply to intoxicating liquor.</p>

13. Further to the exemptions above, SFA proposes to also exempt food packed in small units, where the largest surface area is less than 10 cm², from labelling with the following information.
- a. Statement of ingredients (including food and ingredients known to cause hypersensitivity to individuals)
 - b. Lot identification
 - c. Date marking
 - d. Instructions for use

Food packed in small units will continue to be labelled with the name of the food, net contents, name and address of the food business operator and name of the country of origin.

This is for practical reasons as such products are limited by space and can only be labelled with key information. The proposal is also recommended under the GSLPF.

<p>Question 7: Do you agree to exempt food packed in small units, where the largest surface area is less than 10 cm², from labelling with the following information?</p> <ul style="list-style-type: none"> • Statement of ingredients (including food and ingredients known to cause hypersensitivity to individuals) • Lot identification • Date marking • Instructions for use <p>Food packed in small units will continue to be labelled with the name of the food, net contents, name and address of the food business operator and name of the country of origin.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>If you are not agreeable to the proposal, please provide reason(s) for your answer.</p>

- End of Part B -

PART C: REGULATION 9 OF THE FOOD REGULATIONS

14. Regulation 9 of the SFR currently prohibits the use of claims that are false, misleading or deceptive or is likely to create an erroneous impression regarding the value, merit or safety of the food. Claims to suggest that a food has therapeutic or prophylactic action; or a food will prevent, alleviate or cure any disease or condition affecting the human body; health or improve physical condition may be achieved by consuming the food; or may be interpreted as advice of a medical nature from any person, are prohibited. In addition, SFA has also taken the policy position not to allow the use of the following types of claims on food products sold in Singapore.
- a. Claims to suggest that a food is able to provide a complete and balanced diet, unless otherwise justified by the food business operator that the food is specially formulated to meet the complete nutritional needs of a particular class of consumers (for example, meal replacements or food for special medical purposes)
 - b. Claims that could give raise doubts in the safety of a similar food
15. To provide regulatory clarity on what constitutes a misleading claim, SFA proposes to include claims 14a and 14b under the SFR, using the text as recommended by the Codex General Guidelines on Claims (CXG 1-1979), with the reasons tabulated below.

Inclusion of prohibited claims	Reasons for prohibition
<p>Claims stating that any given food will provide an adequate source of all essential nutrients, except in the case of well defined products for which a Codex standard regulates such claims as admissible claims or where appropriate authorities have accepted the product to be an adequate source of all essential nutrients.</p> <p>Claims implying that a balanced diet or ordinary foods cannot supply adequate amounts of all nutrients.</p>	<p>A balanced diet should be obtained from a variety of food. Unless specially formulated, no single food can provide an adequate source of all essential nutrients.</p> <p>Such claims would also influence how an individual consumes the product over prolonged period, which could pose danger to one's health.</p> <p>However, SFA will exempt food that are specially formulated to provide complete nutrition for specific consumers who require special diet (<i>e.g. food for special medical conditions</i>), from the prohibition.</p>
<p>Claims which could give rise to doubt about the safety of similar food or which could arouse or exploit fear in the consumer.</p>	<p>Such prohibition would prevent food businesses from putting up skewed information to cast doubt on the safety of food that are added with specific ingredients⁸, or highlight the absence of substances that are already not permitted in food.</p> <p>Examples include “<i>Salmonella</i> free”, “Antibiotics/hormones free”, and “Caramel colouring, which has been linked to health issues, is commonly used in soft drinks”.</p>

⁸ All ingredients and additives used in food for sale in Singapore must meet the safety standards under the Food Regulations.

Question 8: Do you agree to include the following as prohibited claims under Regulation 9 of the SFR?

- a. Claims stating that any given food will provide an adequate source of all essential nutrients, except in the case of well-defined products for which a Codex standard regulates such claims as admissible claims or where appropriate authorities have accepted the product to be an adequate source of all essential nutrients.
- b. Claims implying that a balanced diet or ordinary foods cannot supply
- c. Claims which could give rise to doubt about the safety of similar food or which could arouse or exploit fear in the consumer.

Yes

No

If you are not agreeable to the proposal, please provide reason(s) for your answer.

- End of Part C -

PART D: REGULATION 9B OF THE FOOD REGULATIONS

16. Cereals containing gluten is listed as one of the ingredients that would cause hypersensitivity to individuals and are required to be declared under the statement of ingredients under Regulation 5(4)(ea). However, the SFR currently does not stipulate standards for foods that are labelled and sold as “gluten-free”.
17. In general, food business operators must ensure that all claims made on the food they sell are truthful. Currently, SFA advises food business operators to refer to the Codex Standard for Foods for Special Dietary Use for Persons Intolerant to Gluten (CXS 118-1979) established by the international food standards setting body, Codex Alimentarius Commission, for guidance on the use of the claim, “gluten free”.
18. In view of the potential adverse effects to people intolerant to gluten, SFA proposes to adopt the following relevant text from the Codex Standard for Foods for Special Dietary Use of Persons Intolerant to Gluten (CXS 118-1979) under Regulation 9B of the SFR.

Sections	Text
2. Descriptions	<p>2.1 Definitions</p> <p>2.1.1 <i>Gluten-free foods</i> Gluten-free foods are dietary foods</p> <p>a) consisting of or made only from one or more ingredients which do not contain wheat (i.e. all <i>Triticum</i> species, such as durum wheat, spelt, and khorasan wheat, which is also marketed under different trademarks such as KAMUT), rye, barley, oats or their crossbred varieties, and the gluten level does not exceed 20 mg/kg in total, based on the food as sold or distributed to the consumer, and/or</p> <p>b) consisting of one or more ingredients from wheat (i.e. all <i>Triticum</i> species, such as durum wheat, spelt, and khorasan wheat, which is also marketed under different trademarks such as KAMUT), rye, barley, oats or their crossbred varieties, which have been specially processed to remove gluten, and the gluten level does not exceed 20 mg/kg in total, based on the food as sold or distributed to the consumer.</p> <p>2.1.2 <i>Foods specially processed to reduce gluten content to a level above 20 up to 100 mg/kg</i> These foods consist of one or more ingredients from wheat (i.e., all <i>Triticum</i> species, such as durum wheat, spelt, and khorasan wheat, which is also marketed under different trademarks such as KAMUT), rye, barley, oats or their crossbred varieties, which have been specially processed to reduce the gluten content to a level above 20 up to 100 mg/kg in total, based on the food as sold or distributed to the consumer.</p> <p>2.2 Subsidiary definitions</p> <p>2.2.1 <i>Gluten</i> For the purpose of this standard, "gluten" is defined as a protein fraction from wheat, rye, barley, oats or their crossbred varieties and derivatives thereof, to which some persons are intolerant and that is insoluble in water and 0.5M NaCl.</p> <p>2.2.2 <i>Prolamins</i></p>

	<p>Prolamins are defined as the fraction from gluten that can be extracted by 40 - 70% of ethanol. The prolamin from wheat is gliadin, from rye is secalin, from barley hordein and from oats avenin. It is however an established custom to speak of gluten sensitivity. The prolamin content of gluten is generally taken as 50%.</p>
3. Essential composition and quality factors	<p>3.1 For products referred to in 2.1.1 a) and b), the gluten content shall not exceed 20 mg/kg in the food as sold or distributed to the consumer.</p> <p>3.2 For products referred to in 2.1.2 the gluten content shall not exceed 100 mg/kg in the food as sold or distributed to the consumer.</p> <p>3.3 Products covered by this standard substituting important basic foods, should supply approximately the same amount of vitamins and minerals as the original foods they replace.</p>
4. Labelling	<p>4.1 The term "gluten-free" shall be printed in the immediate proximity of the name of the product in the case of products described in section 2.1.1.</p> <p>4.3 A food which, by its nature, is suitable for use as part of a gluten-free diet, shall not be designated "special dietary", "special dietetic" or any other equivalent term. However, such a food may bear a statement on the label that "this food is by its nature gluten-free" provided that it complies with the essential composition provisions for gluten-free as set out in section 3.1 and provided that such a statement does not mislead the consumer.</p>

<p>Question 9: Do you agree to adopt the proposed text as tabulated under paragraph 18 for foods claimed to be "gluten-free" or "reduced gluten" under Regulation 9B of the SFR?</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>If you are not agreeable to the proposal, please provide reason(s) for your answer.</p>

- End of Part D -

ANNEX I: RESPONSE SHEET TO CONSULTATION PAPER

Response due: 20 November 2020

Please provide your responses to the consultation paper on general labelling requirements for prepacked food using this response form.

Name of company/organisation:	
Name of respondent:	
Designation of respondent:	

Response for Part A: Regulation 5 of the Food Regulations

Question 1: Do you agree to mandate the declaration of the lot identification and instruction for use on prepacked food products?
<input type="checkbox"/> Yes <input type="checkbox"/> No
If you are not agreeable to the proposal, please provide reason(s) for your answer.

Question 2: Do you agree to remove the requirements under Regulation 5(6) on minimum font size of the labelling requirements to be labelled on prepacked food?
<input type="checkbox"/> Yes <input type="checkbox"/> No
If you are not agreeable to the proposal, please provide reason(s) for your answer.

Question 3: Do you agree for the food made available for sale through online platforms to provide the following information?
<ul style="list-style-type: none"> a. Name of food b. List of ingredients (including the declaration of tartrazine and food known to cause hypersensitivity) c. Net contents and drained weight d. Name and address of manufacturer, packer, distributor, importer, export or vendor of the food e. Name of the country of origin f. Instruction for use
<input type="checkbox"/> Yes <input type="checkbox"/> No
If you are not agreeable to the proposal, please list down the specific labelling requirement (s) and provide reason(s) for your answer.

<p>Question 4a: Do you agree to declare the ingredients in descending order based on the ingoing weight at the time of manufacture, and for the statement of ingredients to be preceded by an appropriate title (e.g. “Ingredient”) as proposed under Column 2 of S/no. (a) in the Table of paragraph 7?</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>If you are not agreeable to the proposal, please provide reason(s) for your answer.</p>
<p>Question 4b: Do you agree to combine the list of general terms under the First Schedule of the SFR with the list of general class names under the GSLPF as proposed in Column 2 of S/no. (b) in the Table of paragraph 7, for the list of general terms?</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>If you are not agreeable to the proposal, please provide reason(s) for your answer.</p>
<p>Question 4c: Do you agree to replace the text in Regulation 5(4)(b)(ii) under SFR, to declare the addition of water during manufacturing of a food, in Column 2 of S/no. (c) in the Table of paragraph 7?</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>If you are not agreeable to the proposal, please provide reason(s) for your answer.</p>
<p>Question 4d: Do you agree that the breakdown constituents of a compound ingredient constituting less than 5% of the food do not have to be declared provided that:</p> <ul style="list-style-type: none"> (i) the compound ingredient has an established standard in Codex standard or the Food Regulations; and (ii) the breakdown constituent is not a food additive that serves a technological function in the finished product, <p>in Column 2 of S/no. (d) in the Table of paragraph 7 above to align with GSLPF?</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>If you are not agreeable to the proposal, please provide reason(s) for your answer.</p>
<p>Question 4e: Do you agree to require the declaration of the presence of ingredients obtained through biotechnology of an allergen⁹, in Column 2 of S/no. (e) in the Table of paragraph 7?</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>If you are not agreeable to the proposal, please provide reason(s) for your answer.</p>

⁹ Do note that this is not a requirement to declare that the food is derived or contains ingredients that are derived from modern biotechnology. The purpose of this text is to disclose the potential presence ingredients that may cause hypersensitivity to individuals when the ingredient is used as a source.

Question 4f: Do you agree to include the text on the declaration of carried over food additives and processing aids, in Column 2 of S/no. (f) in the Table of paragraph 7?
<input type="checkbox"/> Yes <input type="checkbox"/> No
If you are not agreeable to the proposal, please provide reason(s) for your answer.

Question 5: Do you agree to mandate the declaration of country of origin for both imported and locally manufactured food?
<input type="checkbox"/> Yes <input type="checkbox"/> No
If you are not agreeable to the proposal, please provide reason(s) for your answer.

Question 6: Do you agree to require the name of the country of origin to be accompanied by appropriate qualifiers?
<input type="checkbox"/> Yes <input type="checkbox"/> No
If you are not agreeable to the proposal, please provide reason(s) for your answer.

Response for Part B: Regulation 6 of the Food Regulations

Question 7: Do you agree to exempt food packed in small units, where the largest surface area is less than 10 cm ² , from labelling with the following information? <ul style="list-style-type: none"> • Statement of ingredients (including food and ingredients known to cause hypersensitivity to individuals) • Lot identification • Date marking • Instructions for use Food packed in small units will continue to be labelled with the name of the food, net contents, name and address of the food business operator and name of the country of origin.
<input type="checkbox"/> Yes <input type="checkbox"/> No
If you are not agreeable to the proposal, please provide reason(s) for your answer.

Response for Part C: Regulation 9 of the Food Regulations

<p>Question 8: Do you agree to include the following as prohibited claims under Regulation 9 of the SFR?</p> <ul style="list-style-type: none">a. Claims stating that any given food will provide an adequate source of all essential nutrients, except in the case of well-defined products for which a Codex standard regulates such claims as admissible claims or where appropriate authorities have accepted the product to be an adequate source of all essential nutrients.b. Claims implying that a balanced diet or ordinary foods cannot supplyc. Claims which could give rise to doubt about the safety of similar food or which could arouse or exploit fear in the consumer.
<input type="checkbox"/> Yes <input type="checkbox"/> No
If you are not agreeable to the proposal, please provide reason(s) for your answer.

Response to Part D: Regulation 9B of the Food Regulations

<p>Question 9: Do you agree to adopt the proposed text as tabulated under paragraph 34 for foods claimed to be “gluten-free” or “reduced gluten” under Regulation 9B of the SFR?</p>
<input type="checkbox"/> Yes <input type="checkbox"/> No
If you are not agreeable to the proposal, please provide reason(s) for your answer.

-- End of consultation paper --