

Labeling Food Products in ASEAN: A Juggling Act

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With the official implementation of the ASEAN Free Trade Agreement, effective on January 1, 2010, companies now have an expanded opportunity to increase exports in this important and diverse market. In regard to food, however, it should be noted that companies are still required to register their products with the local food agencies.

Even though harmonization of rules for food products is a stated aim of ASEAN members – similar to the ASEAN Harmonization on Pharmaceutical Registration already in place for pharmaceutical products – harmonized rules have not yet been implemented in this area. While international standards and regulations exist, such as those of the Food and Agriculture Organization of the United Nations, the World Health Organization, and the Codex Alimentarius Commission, some ASEAN countries have not yet adopted these rules.

Given the greater attention consumers now pay to the nutritional value of their diet, food labeling is essential. While the food industry has adapted labels in accordance with consumer demand, labeling requirements can differ between jurisdictions, which may lead to difficulties when attempting to register a product in multiple ASEAN countries.

NUTRITIONAL LABELING

The Codex Alimentarius Commission defines a food label as “any tag, brand, mark, pictorial or other descriptive matter, written, printed, stenciled, marked, embossed or impressed on, or attached to a container of food.” The primary objective of nutrition labeling is to describe the nutritional qualities of a food product in a factual and informative way.



snack foods, such as potato chips, popcorn, extruded snacks, biscuits/crackers, etc., must include the warning “consume less, exercise more.” (See Figure 1)

Similar to the United States, Thailand requires companies to list the four core nutrients (energy, fat, carbohydrates, and protein) and saturated fats, cholesterol, dietary fiber, sugar, vitamin A, vitamin C, calcium, iron, and nutrients as claimed. (See Figure 2) However, a simplified format can include only the four core ingredients, sugar, and sodium (when applicable).

Nutritional Labeling in Other ASEAN Countries. Malaysia has put in place mandatory nutrition labeling for a wide variety of products, including general food. In Indonesia, the Philippines, and Singapore, mandatory nutrition labeling applies only to food for special dietary use, food making nutrition claims, and fortified or enriched foods.

In Malaysia, the Philippines, and Singapore, the four core nutrients (energy, fat, carbohydrates, and protein) must be listed with the nutrients as claimed. The Philippines also requires the declaration of nutrients in fortificants and fortified foods. In Indonesia, the requirements are stricter because, in addition to the four above-mentioned core ingredients, companies must list a fifth core ingredient (sodium) and other nutrients, such as energy from fat, saturated fat, trans fat, cholesterol, dietary fiber, sugar, vitamin A, vitamin C, calcium, and iron. In addition, other nutrients that are added or fortified also have to be included on the label, in accordance with the relevant regulation.

Nutritional Labeling in Thailand.

Food for special dietary use, food making nutrition claims, and fortified or enriched foods are subject to mandatory nutrition labeling. In addition, certain

Figure 1: “Consume Less, Exercise More”



Figure 2: Typical Nutrition Label in Thailand

ข้อมูลโภชนาการ			Nutrition Facts				
หนึ่งหน่วยบริโภค: 1 ออนซ์ (28กรัม) จำนวนหน่วยบริโภคต่อซอง : ประมาณ 2.5			Serving Size: 1 oz. (28g) Serving Per Container: about 2.5				
คุณค่าทางโภชนาการต่อหนึ่งหน่วยบริโภค พลังงานทั้งหมด 140 กิโลแคลอรี (พลังงานจากไขมัน 50 กิโลแคลอรี)			Amount per serving Calories 140 Cal (Calories from fat 50 kg Cal)				
ร้อยละของปริมาณที่แนะนำให้บริโภค*			%Daily Value*				
ไขมันทั้งหมด	6 ก.	9 %	Total Fat	6g	9 %		
ไขมันอิ่มตัว	2.5 ก.	13 %	Saturated Fat	2.5g	13 %		
คอเลสเตอรอล	0 มก.	0 %	Cholesterol	0mg	0 %		
โปรตีน	2 ก.		Protein	2g			
คาร์โบไฮเดรตทั้งหมด	19 ก.	6 %	Total Carbohydrate	19g	6%		
ใยอาหาร	น้อยกว่า 1 ก.	3 %	Dietary Fiber	less than 1g	3%		
น้ำตาล	1 ก.		Sugar	1g			
โซเดียม	220 มก.	9 %	Sodium	220mg	9%		
ร้อยละของปริมาณที่แนะนำให้บริโภค*			% Daily Value*				
วิตามินเอ	0 %	วิตามินบี 1	0 %	วิตามินบี 2	0 %		
แคลเซียม	4 %	เหล็ก	น้อยกว่า 2 %	Iron	less than 2%		
* ร้อยละของปริมาณสารอาหารที่แนะนำให้บริโภคต่อวันสำหรับคนไทยอายุตั้งแต่ 6 ปีขึ้นไป (Thai RDI) โดยคิดจากความต้องการพลังงานวันละ 2,000 กิโลแคลอรี			*Percent Daily Value are based on 2,000 calorie diet for Thai people over 6 years old (Thai RDI)				
ความต้องการพลังงานของแต่ละบุคคลแตกต่างกัน ผู้ที่ต้องการพลังงานวันละ 2,000 กิโลแคลอรี ควรได้รับสารอาหารต่าง ๆ ดังนี้			The person who needs 2,000 calorie diet per day should receive the nutrients as below:				
ไขมันทั้งหมด	น้อยกว่า 65 ก.	ไขมันอิ่มตัว	น้อยกว่า 20 ก.	Total Fat	less than 65g	Saturated Fat	less than 20g
คอเลสเตอรอล	น้อยกว่า 300 มก.	คาร์โบไฮเดรตทั้งหมด	300 ก.	Cholesterol	less than 300mg	Total Carbohydrate	300g
ใยอาหาร	25 ก.	โซเดียม	น้อยกว่า 2,400 มก.	Dietary Fiber	25g	Sodium	less than 2,400mg
พลังงาน (กิโลแคลอรี) ต่อกรัม : ไขมัน = 9 ; โปรตีน = 4 ; คาร์โบไฮเดรต = 4			Energy (kilocalorie) per gram : Fat = 9 ; Protein = 4 ; Carbohydrate = 4				
วันที่ผลิต Mfg.Date.		ควรบริโภคก่อน Best Before:		Mfg. Date.		Best Before:	

NUTRITION CLAIMS

The Codex Guidelines for Use of Nutrition and Health Claims, dated June 2004, state that nutrition claims should include (1) nutrient content claims that describe the level of nutrients in a food (e.g. "high in vitamin C" or "free of cholesterol") and (2) nutrient comparative claims that compare the nutrient and/or energy value of two or more foods (e.g. "less sodium" or "more protein").

Indonesia, the Philippines, Singapore, and Thailand allow nutrition content claims and nutrient comparative claims, but each country has its own nutrient

reference value. In Malaysia, nutrition content claims and nutrient comparative claims and claims for enrichment are also allowed. Their required format and criteria are generally similar to Codex.

CONFLICTING REQUIREMENTS CAUSE HIGHER COSTS

As demonstrated by the above examples, as well as in the case of health claims, the lack of harmonized regulations in ASEAN countries creates a budget issue for companies because each country requires a different label, leading to additional costs and often resulting in local regulatory infractions if not carefully implemented, particularly

by locally appointed distributors, agents, licensees, and franchisees responsible for local regulatory compliance matters.

Logistical issues also arise in cases where claims are authorized in one country, but not in another. Companies must then try to negotiate by submitting supporting evidence to establish the veracity of such claims, but this may lead to important differences between countries. At the same time, national food agencies are enacting stricter requirements, such as Thailand's FDA, which cites the need to educate the consumers effectively. In order to overcome these differences, companies should follow the international regulations and support any labeling or claims with strong evidence. ■

Given the greater attention consumers now pay to the nutritional value of their diet, food labeling is essential.

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