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Food (Amendment) Regulations 2025: Enhancing Alignment with International Food Labelling Standards

The recent Food (Amendment) Regulations 2025 aims to align food labelling requirements in Singapore with international standards, particularly those of the Codex Alimentarius. Key updates include new rules for gluten-related claims, expanded use of generic terms in ingredient lists, and clearer labelling requirements.

Introduction

The Food (Amendment) Regulations 2025 was officially gazetted on 31 January 2025, with the new regulations set to take effect on 30 January 2026¹. These amendments introduce significant changes to Singapore's Food Regulations, a subsidiary legislation under the Sale of Food Act² which regulates matters relating to, inter alia, the manufacturing, preparation, or preservation of food and food contact articles.

A key objective of these amendments is to align Singapore's food labelling requirements for prepacked food with international standards, particularly those established in the Codex Alimentarius³—a globally recognized set of food standards, guidelines, and codes of practice developed by the Food and Agriculture Organization (“FAO”) and World Health Organization (“WHO”) to promote food safety, quality, and fair trade. The revised regulations incorporate several Codex standards, including the Codex General Standard for the Labelling of Prepackaged Foods (CXS 1-1985)⁴, the Codex General Guidelines on Claims (CXG 1-1979)⁵, and the Codex Standard for Foods for Special Dietary Use for Persons Intolerant to Gluten (CXS 118-1979)⁶. These updates were finalised following a public consultation held from 28 September 2022 to 27 November 2022, during which industry feedback was considered⁷.

Key Amendments Introduced

1. Regulation 250B: New Provisions for Gluten-Related Claims

One of the most significant changes is the introduction of Regulation 250B⁸, which establishes clear definitions and criteria for gluten-related claims. To prevent misleading labelling and ensure consistency, specific definitions for the terms "gluten", "gluten-free food", "naturally gluten-free food" and "reduced gluten food" are now expressly defined. Additionally, naturally gluten-free foods can no longer be marketed using the terms "special dietary", "special dietetic" or any words of similar meaning.

¹ See Singapore Food Agency (“SFA”) Circular on “Food (Amendment) Regulations 2025” <<https://www.sfa.gov.sg/news-publications/circulars-and-notices/circulars/food-amendment-regulations-2025>>.

² Sale of Food Act 1973 <<https://sso.agc.gov.sg/Act/SFA1973>>.

³ See “Codex Alimentarius International Food Standards” <<https://www.fao.org/fao-who-codexalimentarius/en/>>.

⁴ See “General Standard For The Labelling Of Pre-packaged Foods CXS 1-1985” <https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fstandards%252FCXS%2B1-1985%252FCXS_001e.pdf>.

⁵ See “General Guidelines On Claims CXG 1-1979” <<https://www.fao.org/4/y2770e/y2770e05.htm>>.

⁶ See “Standard for Foods for Special Dietary Use for Persons Intolerant to Gluten CXS 118-1979” <https://www.fao.org/input/download/standards/291/CXS_118e_2015.pdf>.

⁷ See “SFA Consultation Papers” <<https://www.sfa.gov.sg/public-consultation/proposed-amendments-to-legislation>>.

⁸ See Regulation 7 of the Food (Amendment) Regulations 2025 <<https://sso.agc.gov.sg/SL-Supp/S92-2025/Published/20250131?DocDate=20250131&WholeDoc=1&ProvlDs=pr7-#pr7->>>.

New regulation 250B	<p>In the Food Regulations, after regulation 250A, insert —</p> <p>250B.— (1) In these Regulations —</p> <p>“gluten” means a protein fraction from a cereal specified in paragraph (2), to which some persons are hypersensitive, and that is insoluble in water or 0.5M NaCl, that is, 0.5 molar sodium chloride solution;</p> <p>“gluten-free food” means food —</p> <p>(a) that is not or does not contain a cereal specified in paragraph (2) and contains 20 mg/kg or less of gluten by weight of the food as sold to the purchaser; or</p> <p>(b) that is or contains a cereal specified in paragraph (2) but has been processed so that it contains 20 mg/kg or less of gluten by weight of the food as sold to the purchaser;</p> <p>“naturally gluten-free food” means food that is not or does not contain a cereal specified in paragraph (2) and contains 20 mg/kg or less of gluten by weight of the food as sold to the purchaser;</p> <p>“reduced gluten food” means food that is or contains a cereal specified in paragraph (2) but has been processed so that it contains more than 20 mg/kg but less than or equal to 100 mg/kg of gluten by weight of the food as sold to the purchaser.</p> <p>(2) For the purpose of paragraph (1), the cereals are —</p> <p>(a) barley;</p> <p>(b) oat;</p> <p>(c) rye;</p> <p>(d) wheat — that is, durum wheat, khorasan wheat, spelt or any other Triticum species;</p> <p>(e) a hybridised strain of a cereal mentioned in sub-paragraph (a), (b), (c) or (d); and</p> <p>(f) a product of a cereal mentioned in sub-paragraph (a), (b), (c) or (d).</p> <p>(3) Gluten-free food or reduced gluten food that is intended to replace any food as a source of any key nutrient (like carbohydrates, protein, fats or essential vitamins and minerals) must contain approximately the same amounts of the key nutrient as the replaced food.</p> <p>(4) Subject to paragraph (5), a package of food must not be labelled with the words “gluten-free”, “naturally gluten-free” or “reduced gluten” unless the package of food contains only gluten-free food, naturally gluten-free food or reduced gluten food, as the case may be.</p> <p>(5) Where a package of food contains —</p> <p>(a) any gluten-free food, naturally gluten-free food or reduced gluten food; and</p> <p>(b) any other food,</p> <p>the package of food must not be labelled with the words “gluten-free”, “naturally gluten-free” or “reduced gluten” unless those words appear immediately before or after the name of the food mentioned in sub-paragraph (a) on the label.</p> <p>(6) A package of naturally gluten-free food must not be labelled with the words “special dietary”, “special dietetic” or any words of similar meaning”.</p>
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2. First Schedule: Expansion of Generic Terms in Ingredient Declarations

The amendments also replace the First Schedule of the Food Regulations (“**First Schedule**”)⁹, expanding the permitted use of generic terms in ingredient lists. The revised First Schedule broadens existing definitions,

⁹ See Regulation 8 of the Food (Amendment) Regulations 2025 <<https://sso.agc.gov.sg/SL-Supp/S92-2025/Published/20250131?DocDate=20250131&WholeDoc=1&ProvlDs=pr8-#pr8->>.

allowing for more flexibility in labelling while introducing new generic terms such as “Caseinate,” “Cheese,” “Cocoa Butter,” and “Poultry Meat.” However, in certain cases, stricter requirements now apply. For instance, while the term “flavouring” can still be used, manufacturers must now specify its source—whether “natural,” “nature-identical,” “artificial,” or a combination of these.

Non exhaustive list of changes to the First Schedule		
Generic Terms	Existing description	Amended description
Fish	Fish when forming an ingredient of fish products	Any species of fish, where the labelling and presentation of the food does not refer to a specific species of fish
Imitation cream	Imitation cream when forming an ingredient of some other food	Any type of imitation cream
Starch	Prepared purified starch when forming an ingredient of some other food, except modified starch	Any type of starch, other than any chemically modified starch
Colourings/colouring matter	Colourings, when forming an ingredient of some other food	Any colouring
Emulsifiers/stabilisers or emulsifying/stabilising agents	Emulsifiers/stabilisers or emulsifying/stabilising agents	Any emulsifier or stabiliser
(*Existing Generic Term) Flavouring (*Amended Generic Term) Flavour or flavouring, qualified by the words “natural”, “nature identical” or “artificial”, or a combination of any of these words, if applicable	Flavourings, when forming an ingredient of some other food	Any flavouring
Caseinate	N.A.	Any type of caseinate
Cheese	N.A.	Any type of cheese or mixture of cheese, where the labelling and presentation of the food does not refer to a specific type of cheese
Cocoa butter	N.A.	Pressed, expeller or refined cocoa butter
Poultry meat	N.A.	Any type of poultry meat, where the labelling and presentation of the food does not refer to a specific type of poultry meat

3. Regulation 5: Refinements to General Labelling Requirements

Significant refinements have also been made to Regulation 5¹⁰, which governs general labelling requirements. Notably, processing aids¹¹ are now exempt from being listed as ingredients, aligning with international practices. Additionally, for greater clarity and consistency, ingredient lists must now be clearly identified with a heading such as "Ingredients." The changes include revisions to existing wording and the addition of new subsections under Regulation 5.

Non exhaustive list of changes to the Regulation 5	
Existing Regulation 5	Amended Regulation 5
5.— (4)(b) 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 weight in which they are present.	5.— (4)(b) a list of ingredients containing the appropriate designation of each ingredient (other than any processing aid) in the case of food consisting of 2 or more ingredients and, unless the quantity or proportion of each ingredient is specified, the ingredients are to be specified in descending order of the proportions by ingoing weight at the time of manufacture.
5.— (4)(b)(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; (*Revised and moved to 5.—(4)(b)(v) in the amended regulations)	5.— (4)(b)(iii) the list of ingredients must be preceded by a heading or title that indicates that the list is of the ingredients;
N.A.	5.— (4)(b)(vi) where any food additive is carried over from an ingredient into a finished food product — where the food additive is in an amount sufficient to perform a technological function in that product, the food additive must be specified by its appropriate designation; and to avoid doubt, where the food additive is in an amount that is not sufficient to perform any technological function in that product, the food additive need not be specified; and

4. Regulation 6: Refinements to General Labelling Requirements

Finally, Regulation 6 which outlines exemptions from Regulation 5, has also been refined¹². The scope of these exemptions has been expanded to cover a much wider range of prepackaged foods, provided that the packaging

¹⁰ See Regulation 3 of the Food (Amendment) Regulations 2025 <<https://sso.agc.gov.sg/SL-Supp/S92-2025/Published/20250131?DocDate=20250131&WholeDoc=1&Provids=pr3-#pr3->>>.

¹¹ Under the Food (Amendment) Regulations 2025, “processing aid” generally means any substance or material used to perform a technological function in the treatment or processing of any food that may result in the non-intentional but unavoidable presence of residue or derivative of the substance or material in the final product other than (A) an apparatus or utensil, (B) an ingredient consumed on its own and (C) a food or an ingredient mentioned in Regulation 5(ea). See Regulation 3 of the Food (Amendment) Regulations 2025 <<https://sso.agc.gov.sg/SL-Supp/S92-2025/Published/20250131?DocDate=20250131&WholeDoc=1&Provids=pr3-#pr3->>>.

¹² See Regulation 4 of the Food (Amendment) Regulations 2025 <<https://sso.agc.gov.sg/SL-Supp/S92-2025/Published/20250131?DocDate=20250131&Provids=pr4-#pr4->>>.

is small, with the largest surface area measuring less than 10 square centimetres:

List of changes to Regulation 6	
Existing Regulation 6	Amended Regulation 6
<p>6.— (4) Regulation 5(4)(b) does not apply to prepacked infant formula (within the meaning of regulation 252(1)) that —</p> <p>(a) does not contain an ingredient or a food additive, or a proportion of an ingredient or a food additive, which is not permitted by these Regulations for infant formula; and</p> <p>(b) bears a label containing —</p> <p>(i) a specific name or description or a generic name or description (whether or not provided in the First Schedule) of every ingredient contained in the infant formula; and</p> <p>(ii) particulars about the ingredients which are otherwise in compliance with regulation 5(4)(b).</p>	<p>6.— (4) Regulation 5(4)(b), (c), (da), (ea), (eb), (f) and (fa) does not apply in respect of prepacked food —</p> <p>(a) contained in packaging where the side of the packaging with the largest surface area is less than 10 square centimetres; and</p> <p>(b) where the particulars required under those provisions are made accessible to a prospective purchaser through —</p> <p>(i) a physical document; or</p> <p>(ii) a website or other electronic record.</p>
N. A	<p>6.— (5) Regulation 5(4)(da) does not apply to prepacked fruits or vegetables that are fresh, whole and unpeeled.”</p>

Conclusion

The Food (Amendment) Regulations 2025 adopts a balanced approach, refining certain regulations while tightening others to improve transparency and consumer awareness, rather than imposing uniformly stricter standards. These changes underscore Singapore’s commitment to aligning its food safety and labelling regulations with international standards. Food manufacturers involved in prepackaged food should take the necessary steps to understand and implement these updates ahead of their enforcement in 2026, ensuring smooth compliance within the provided transition period.

Should you have any queries on this update or generally, please feel free to contact any one of the undersigned.

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