

March 2025

Singapore Enacts Comprehensive Food Safety and Security Act

On January 8, 2025, the Singapore Parliament passed the Food Safety and Security Act, a legislative measure designed to consolidate and enhance existing food-related laws to address the evolving challenges of Singapore's food sector. The implementation of the Food Safety and Security Act will occur in phases, commencing in the second half of 2025 and concluding by 2028, allowing stakeholders adequate time to adapt to the new regulatory framework.

Main Thrusts of the Food Safety and Security Act and Key Legal Considerations

The Food Safety and Security Act is founded on the following key principles¹:

- Consolidation of Existing Food-Related Legislations:** Prior to the Food Safety and Security Act, Singapore's food-related legislations were dispersed across nine different statutes. Moving forward, the Food Safety and Security Act will provide a single comprehensive framework in order to streamline regulatory oversight and encourage innovation within the food sector.
- Enhanced Food Safety Measures:** The Food Safety and Security Act will introduce stricter safety protocols to better protect consumers and to promote the development of the food industry. This includes mandatory record-keeping for importers, animal feed producers, and slaughterhouses to facilitate traceability and the swift recall of contaminated products.
 - The Food Safety and Security Act enhances the regulatory framework by expanding offences to cover all stages of the food supply chain, regardless of commodity type or business activity, and by standardising penalties. For the most serious food-related offences, first-time corporate offenders face fines of up to \$50,000, while individuals may be fined up to \$25,000, jailed for up to 24 months, or both.
 - Recalcitrant offenders whose licenses are revoked due to fraud or multiple food safety lapses can be disqualified from holding new licenses of the same type for up to three years.
- Strengthening Singapore's Food Supply Resilience:** The Food Safety and Security Act will expand the existing stockpiling measures (such as giving the Minister the power to declare essential food items or agri-food production inputs to be subject to stockpiling requirements if the need arises), enabling a more robust response to potential supply chain disruptions.

Impact on Stakeholders

- Licensable Food Businesses:** Under the Food Safety and Security Act, a person who intends to carry on a licensable food business (which means a food business in Singapore that falls within a class of retail food business or non-retail food business that is specified in the First Schedule of the Food Safety and Security Act) must be appropriately licensed (or exempted). Depending on the licensable food business that the licensee is involved with, the licensee may be required to, inter alia, carry on the licensable food business in accordance with an accepted food control plan or farm management plan², ensure its workers receive regular food safety training to stay updated on best practices, and/or maintain records to enable swift tracing and have procedures in place for the recall of unsafe food³.

¹ 2nd reading of the Food Safety & Security Bill - Opening speech by Minister Grace Fu | Ministry of Sustainability and the Environment <<https://www.mse.gov.sg/latest-news/2nd-reading-food-safety-security-bill-opening-speech-minister-grace-fu>>.

² See Section 90 of the Food Safety and Security Act 2025 for the definitions of "food control plan" and "farm control plan" <<https://sso.agc.gov.sg/Act/FSSA2025?WholeDoc=1#P111-P23>>.

³ See "Securing our food future through the Food Safety and Security Bill" <<https://www.sfa.gov.sg/food-for-thought/article/detail/securing-our-food-future-through-the-food-safety-and-security-bill>>.

A licensable food business as defined under the Food Safety and Security Act includes the following non-exhaustive examples⁴:

a. Retail

- i. A restaurant, café, bar or similar eating establishment.
- ii. A food court, coffee shop, eating house, canteen or cafeteria.
- iii. A cooked food stall in a food court or coffee shop that is not the proprietor of the food court or coffee shop.
- iv. A bubble tea shop or sandwich kiosk, cut-fruits shop, fresh fruit juice shop, but not a shop selling wholly prepacked food.
- v. A business selling food or such food and goods in a public place from any temporary food premises which are not part of a temporary fair or a vehicle.
- vi. A retail butcher or fishmonger shop or stall.
- vii. A supermarket with any raw meat or fish or any marinated cuts of meat available for sale.
- viii. A food stall in a temporary fair where food is prepared for sale, and may be served, on the order of a customer.

b. Non-Retail

- i. A food business that involves any primary production activity (save for excluded categories such as the raising of an animal which is not for sale).
 - ii. A food business that involves the manufacturing, processing or packing of meat or fish, or meat products or fish products.
 - iii. A food business that involves the slaughtering of animals for meat, meat processing or other production of meat products.
 - iv. A food business that conducts activities such as food manufacturing with the purpose of selling to other food businesses or exporting.
 - v. A food business engaged in storing meat or meat products, or fish or fish products for a fee or reward.
 - vi. A food business that provides facilities, tools and equipment for hire to another food business for the purpose of selling food by retail or selling food to any other food business or for export.
 - vii. A food business involving the of a commissary kitchen or centralised commercial kitchen.
 - viii. A food business that consists wholly or substantially of a catering service, catering meals for passengers travelling on airlines or other passenger transport services.
- **Animal Feed Producers:** To ensure food safety, businesses that manufacture animal feed will need to be appropriately licensed. Apart from the need to develop and implement a feed control plan, a holder of an animal feed production licence must also maintain detailed records to enable swift tracing and have procedures in place for the recall of any unsafe animal feed⁵.
 - **Users of Agricultural Pesticides:** Farms that grow and supply fruits and vegetables for human consumption must use only registered pesticides to ensure food safety. Before applying these pesticides, they are required to engage certified pesticide operators that have been registered with the Singapore Food Agency.

⁴ First Schedule of the Food Safety and Security Act 2025 <<https://sso.agc.gov.sg/Act/FSSA2025?WholeDoc=1#P111-P23>>.

⁵ See “Securing our food future through the Food Safety and Security Bill” <<https://www.sfa.gov.sg/food-for-thought/article/detail/securing-our-food-future-through-the-food-safety-and-security-bill>>.

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- **Traders (Importers, Exporters and Transhippers):** To uphold food integrity, a person must hold the relevant licences and/or permits for the importing, exporting, and/or transhipping of food items that are considered controlled items⁶. Additionally, a licensed food importer must maintain records to enable swift tracing and have procedures in place for the recall of unsafe food⁷. Besides controlled items, the Food Safety and Security Act also regulates the trade of prohibited food, which includes any food or brand of food that the Minister or any other written law (other than the Food Safety and Security Act) have prohibited from import.
 - **Rice Stockpilers and Agri-food supply chain stakeholders:** To enhance food supply resilience, entities may be subject to a Minimum Stockholding Requirement (“**MSR**”) whereby they are required to stockpile essential food items or agri-food production inputs, with compliance checks in place. Rice importers, who currently stockpile under the Rice Stockpile Scheme, will continue to do so under the new MSR scheme. Additionally, individuals or businesses closely linked to the agri-food supply chain may be required to provide information within a reasonable specified period to the Singapore Food Agency when necessary⁸.

Phased Implementation Timeline

The Food Safety and Security Act is set to be implemented in phases through 2028, introducing several key changes with significant legal implications⁹.

- **Second Half of 2025:** Initial provisions will come into effect, focusing on “defined foods¹⁰” and non-packaged drinking water.
- **By 2028:** Full implementation of all Food Safety and Security Act provisions is expected, allowing industries adequate time to adapt to the new regulations.

Conclusion

The Food Safety and Security Act represents a pivotal advancement in Singapore's approach to managing food safety and security. By unifying existing laws and introducing robust measures to address contemporary challenges in the agri-food sector, the Food Safety and Security Act aims to safeguard public health and ensure a resilient food supply chain¹¹. Stakeholders are encouraged to familiarise themselves with the new requirements and prepare for the phased implementation to ensure compliance and contribute to the overarching goal of a safer, more secure food landscape in Singapore.

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

⁶ See Part 3 of the Food Safety and Security Act 2025 <<https://sso.agc.gov.sg/Act/FSSA2025?WholeDoc=1#P111-P23>>.

⁷ See “Securing our food future through the Food Safety and Security Bill” <<https://www.sfa.gov.sg/food-for-thought/article/detail/securing-our-food-future-through-the-food-safety-and-security-bill>>.

⁸ Ibid.

⁹ 2nd reading of the Food Safety & Security Bill - Opening speech by SMS Koh Poh Koon | Ministry of Sustainability and the Environment <<https://www.mse.gov.sg/latest-news/2nd-reading-food-safety-security-bill-opening-speech-sms-koh-poh-koon>>.

¹⁰ See Section 13 of the Food Safety and Security Act 2025 for the definition of “defined food” <<https://sso.agc.gov.sg/Act/FSSA2025?WholeDoc=1#P111-P23>>.

¹¹ 2nd reading of the Food Safety & Security Bill - Opening speech by Minister Grace Fu | Ministry of Sustainability and the Environment <<https://www.mse.gov.sg/latest-news/2nd-reading-food-safety-security-bill-opening-speech-minister-grace-fu>>.

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