

Nutrition labelling for fortified foods in Thailand



Mandatory iodisation of food-grade saalt (except for specific foods, e.g., electrolyte drinks and foods that use <1% salt as an ingredient or <1% salt in a finished product). Rice can be voluntary fortified with vitamins B1, B2 and B3.

1. TAKEAWAYS

Labels on most foods in Thailand must include a nutrient declaration – this may include fortified foods (section 3). Edible iodised salt must include a statement 'Iodized edible salt', and nutrition and health claims are voluntary but must meet conditions, including "fortified" or "enriched" claims (section 4). No fortification logo exists, but other supplementary nutrition information may be included on some foods (section 5). On page 2, iodized salt is provided as a pictorial case study product (section 6) as well as a summary of key regulations (section 7) and links to further information (section 8)



2. GENERAL

- It is an offence to label food in a false or misleading manner (e.g., to include B12 in the food's ingredients list when no B12 is present).
- Labelling must be expressed in Thai. In addition, it can be expressed in va foreign language.
- Labels must be readily legible, in a prominent position, and proportional (e.g., size requirements apply, e.g., not <2mm for name of food, not <1mm for small labels and for texts re nutrients, nutrient values etc.); background label colour must contrast with text colour for legibility.
- A licence must be obtained from the Federal Drug Administration's (FDA) Food Bureau prior to manufacturing or importing food to ensure foods meet relevant standards (including for labelling). A licence is valid until 31 December three years from issue date. An extension can be sought prior to licence expiry, with a right to appeal if rejected. The FDA must also approve any proposed advertising of a food.



3. NUTRIENT DECLARATION

Nutrient declarations are mandatory for most foods in Thailand. E.g., foods with a nutrition claim [the regulation does not include a "health claim"], that use food value in salt promotion, that define consumer groups (e.g., elderly), specific foods notified by the Food and Drug, and processed foods that require the 'Guideline Daily Amount' front-of-pack nutrition label (FOPNL).



A nutrient declaration must:

- Be presented the specified format per regulation that varies for container size, e.g., full-form, short-form and dual nutrition display box, and number of nutrients. The background of the databox must be a single colour. The text must be a single colour, contrasting with the background with text size large enough to be easily read. Nutrition information should be in columns (except for labels <80cm²).
- Be titled "Nutrition Facts"

- Include a single serve's mass of volume and the number of servings per package.
- Include minimum mandatory nutrition information per serve and as % Recommended Daily Intake (RDI)*: Total energy (kcal); total fat (g); protein (g); total carbohydrates (g); sugar (g); sodium (g).
 - Full form formats must also state: energy from fat (kcal); saturated fat (g); cholesterol (mg); dietary fiber (g); Vitamin A; Vitamin B1; Vitamin B2; Calcium; and Iron.
 - Foods without a reference serving size can be expressed per 100g (solids) / mL (liquids).
- Include the statement *"*Percentage of nutrients for Thai recommended daily intakes for ages of 6 years and up (Thai RDI) are based on the energy demand of 2,000 kilocalories / day."*
- Include a panel with the RDI for an individual with energy needs of 2000 kcal per day for the following nutrients on some full formats only: total fat (< 65 g); saturated fat (< 20 g); cholesterol (< 300 mg); total carbohydrate (300 g); dietary fiber (25 g) and sodium (< 2,400 mg).

4. NUTRITION AND HEALTH CLAIMS + FORTIFICATION CLAIMS



- You may make voluntary nutrient content, comparative, health, and "fortified" claims.
- **Nutrient content** (e.g., "low in", "source of"), **comparative** (e.g., "less than or fewer" compared to a reference food), and **nutrient function claims** (e.g., by reference to Thai RDIs for 6+ years) – are allowed but are subject to conditions. E.g., comparative claims must specify the reference food and display the comparative nutrient or energy level increased or decreased to the reference food; nutrient function claims must be based on reliable scientific evidence).
 - Comparative **claims of "enriched" or "fortified" can be claimed for vitamins and minerals** (excluding sodium), dietary fibre or protein provided that per 100g or 100mL when compared to the reference food, the nutrient content is $\geq 10\%$ of the Thai RDI for 6+ years and the reference food is displayed on the label.
- **Edible iodized salt** (as a food or ingredient) must be labelled with "Iodized edible salt" in Thai (and also in a foreign language) in clearly legible text $\geq 5\text{mm}$ height with the food name and other particulars. A similar fortification phrase exists for foods with added Phytosterols.
- Only foods that meet nutrient criteria can make claims such as "low fat" or that express health such as 'healthy' e.g., per serve or 100 g/ml contain: sodium ≤ 360 mg; cholesterol ≤ 60 mg; and vitamin A, B1 or B2, protein, calcium, iron and dietary fiber $\geq 10\%$ of Thai RDI.
- **Some claims are prohibited**, e.g., you cannot claim or lead consumers to think that a food or its nutrients prevents or cures disease.

5. SUPPLEMENTARY NUTRITION INFORMATION



You must include **Guideline Daily Amount (GDA)** FOPNL logo for a range of processed foods (e.g., snacks, bakery products, noodles). It is voluntary for other foods. The GDA logo (example right) must:

- Be four vertical cylindrical shapes displaying energy value, sugar, fat, and sodium content, and must meet colour and contrast requirements.
- Include % of GDAs; “nutritional value per.” (easily understood unit e.g., per cup/packet); “should divide to eat...times” (if >1 serve per pack).

- [labels must also state] “consume small amount and exercise for healthy condition” in bold, visible letters contrasting letters.
- [for some products where the FOPNL is <65cm²] a nutrient detective mobile application can be applied.
- You may include a Voluntary “**Healthier Choice**” (example right) nutritional logo on products considered a healthier choice within a food category, as demonstrated by meeting nutrient profiling criteria for energy, fat, sugar, and sodium.
- The logo must be a specified format and size. E.g., printed in a prominent position on the main panel in bold print against a contrasting or clear background, and be clearly visible, legible and indelible

6. PICTORIAL CASE STUDY PRODUCT – IODIZED SALT

This case study product only details the three nutrition label types outlined in this fact sheet – nutrient declaration and fortification claim – along with a product name. SNI are required on some foods as detailed in section 5. Figures used are provided as an example only and may not be accurate. Other details are also required on food labels (e.g., ingredient list and weight) but not shown here.



Front of pack

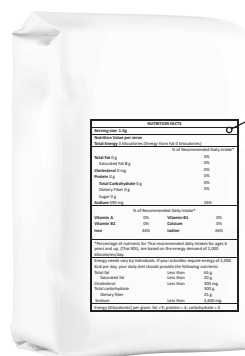
No fortification logo exists

Fortification claim



Back of pack

Nutrient declaration



Iodized salt may be exempt from requiring a nutrient declaration (see further section 7 and the Edible Salt Notification).

7. MORE DETAIL ON THE LABELLING REGULATIONS



- The **Food Act B.E. 2522 (1979)** sets out the powers to regulate food labelling including to promulgate Ministerial Regulations re labelling and the FDA's requirements for food licensing. The Act also prohibits false and deceptive food labelling and advertisements.

Notifications of the Ministry of Public Health:

- **No. 182 of B.E. 2541 (1998)** and **No. 219 of B.R. 2544 (2001)** Re: Nutrition Labelling sets out requirements for nutrition labelling, including nutrient declarations (nutrition facts) and nutrition and health claims. Conditions for comparative nutrient claims of “added, fortified, or enriched” are specified. Requirements are also included around process controls for iodine addition or mixing. Note that the Notification of the Ministry of Public Health (**No. 219) B.E. 2544 (2001)** Re: Nutrition Labelling (No. 2) is not included but specifies dual display of nutrition declaration if a product is sold subject to mixing with other ingredients or further processing pre-consumption.
- **No. 367 B.E. 2557 (2014)** Re: Labelling of Pre-packaged Foods sets out general labelling requirements for pre-packaged foods (e.g., ingredients) excluding foods sold by food hawkers, for sale in hotels etc., and prohibits false, misleading and/or deceptive labelling.
- **Re: Edible Salt 2011** mandates salt iodisation and required labelling of iodised salt. The Notification exempts edible salt from required labelling under the “Notification of the Ministry of Public Health, Re: Label”, but the Notification does not specify any number or year and is thus it is unclear what the effect of this is.

- **No.373 B.E. 2559 (2016)** Re: The Display of Nutrition Symbol on Food Label establishes the “Healthier Choice” nutrition logo.
- **No. 394 B.E.2561 (2018)** Re: Food products Required to bear Nutrition Labelling and Guideline Daily Amounts, GDAs Labelling establishes the FOPNL, required format of nutrition declaration (nutrition facts) and a consumption warning.
- As an ASEAN Member State, a set of non-binding regional guidelines, principles and standards are applicable to Thailand's labelling laws and/or fortification largely to strengthen regional cooperation and coordination in nutrition, but none directly affect the regulatory environment described in this fact sheet.

8. REGULATORS, USEFUL CONTACTS AND WHERE TO GET MORE INFORMATION



- The **Ministry of Public Health's Food and Drug Administration** implements the regulations above.
- Most of the relevant Thai Government regulations can be searched on the FDA's **Laws and Regulations** website.
- The US Department of Agriculture's (USDA) Foreign Agricultural Service issues a Food and Agricultural Import Regulations and Standards Country Report for Thailand on a regular basis. See their **Thailand page** to access the latest report.
- The Global Fortification Data Exchange's **Thailand Fortification dashboard** provides more detail about food fortification in the country.