

# Nutrition labelling for fortified foods in Vietnam



Mandatory fortification of wheat flour used for food processing with iron and zinc; vegetable oils that contain one of soy oil, palm oil, rapeseed oil, and peanut oil must be fortified with Vitamin A, (except those used for food processing); edible salts and salts used for food processing with iodine. Voluntary fortification of “supplementary” or “supplemented” foods is also allowed, with specific micronutrients and sources of micronutrients specified in regulations.

## 1. TAKEAWAYS

Labels on fortified foods in Vietnam may include a nutrient declaration (section 3) but are proposed to become mandatory under a draft government circular. Where foods are fortified in line with regulations, foods can also make nutrition and health claims (section 4). On page 2, wheat flour 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

- All mandatory contents must be stated in Vietnamese and can be listed in another language, provided the text is  $\leq$  than in Vietnamese.
- Text on labels must be  $\geq 1.2$ mm in height, except on smaller labels of  $< 80$ cm<sup>2</sup> where text cannot be  $< 0.9$ mm. Text colour must contrast with the label's background colour.
- Those involved in food labelling are encouraged to follow Codex Alimentarius standards and guidelines for nutrition labelling.
- To sell a pre-packaged food in Vietnam, a food supplier must submit a self-declaration to the relevant regulatory authority to receive a certificate of product registration, that must be posted on the authority's website and by the producer via mass media, their website or on their premises. To obtain this certificate, most manufacturers (aside from micro-food processors) must also obtain a certificate of food safety. This appears to be the same as the requirement for a “regulation conformity declaration” for functional foods (including voluntarily fortified foods). Self-declarations and advertising registrations (required for dietary supplements etc.) are both publicly available on regulator websites (e.g., some authorisation requirements can be undertaken on the National ATTP Public Service Registration System).



## 3. NUTRIENT DECLARATION

Nutrient declarations are not required by current legislation in Vietnam, but as stated above, manufacturers and others involved in food labelling are encouraged to follow Codex Alimentarius standards and guidelines for nutrition labelling (e.g., that recommend mandatory nutrient declarations on all pre-packaged foods with certain exemptions).

Further, under the Draft Circular – Guidelines for nutrition labelling of foods G/TBT/N/VNM/219, nutrient declarations would become mandatory for pre-packaged foods with some exceptions, e.g., table salt, single ingredient foods.

The proposed nutrient declaration in the Draft Circular reviewed must:

- Be presented in a tabular (or table) format in numbers



- Be titled “Nutrition Facts”
- Include minimum mandatory nutrition information: energy (kcal or kj); protein (g); carbohydrates (g); total sugar (g); fat (g); saturated fat (g); sodium (mg).
- Express nutrition information in columns either:
  - Per 100g (solids) / 100mL (liquids) of food and as a % of the nutritional reference values (NRVs), or
  - If a food has many servings, per serve of food and as a % of NRVs. For this format, total servings per package and the size of each serving (g/ml) must also be stated.
- Include the following footer “% of nutritional reference value is the ratio of meeting daily nutritional requirements (with a serving of 2000 Kcal) of each nutritional ingredient in 100g or 100ml foods” (or “in a serving” if declaration is expressed per servings).
- Be easy to understand, read and identify, and attached to the product's packaging and cannot be erased.

## 4. NUTRITION AND HEALTH CLAIMS + FORTIFICATION CLAIMS



- You may include on the label some voluntary claims on any foods and specific claims on voluntarily fortified or “supplementary foods” provided they meet requirements as detailed below.
- On any food, a nutrient content claim such as “source of” or “high in” a vitamin or mineral provided it contains a specific % of the NRV for a vitamin or mineral. E.g., for “source of” the vitamin or mineral must be present in the food in an amount  $\geq 15\%$  RNI per 100g. Claims of “low” or “no” claims can also be made if they meet specified content requirements.
- On voluntarily fortified foods (when fortified per regulations):
- Nutrient content claims of “[name and content of substance]” for each serve or per 100g can be made if the micronutrient content is  $\geq 10\%$  of RNI for Vietnam and does not exceed maximum intake limits. Where no RNI or maximum intake limits are set for Vietnam, provisions of Codex or international organizations apply.
- Health claims must be written clearly and consistently, must specify target consumers, and can only be made if the content of the nutrient is  $\geq 10\%$  of RNI for Vietnam, and the claim is accompanied by scientific evidence. Where no RNI is available, health claims can be made only when accompanied by scientific evidence OR when the contents conform to recommended intakes in existing scientific documents.
- Supplemented food labels must also include:
- Recommendations about risks, if any
- Phrase “Supplemented foods” or the phrase stating the name of the food must be written in the main panel of the label
- Target population for the RNI or recommended intake.
- Advertisements (including labels) for foods must state “This product is not a medicine and is not a substitute for medicines” and be consistent with the effects of the product and not use images of health facilities and workers for example. Functional foods (that can include fortified foods) cannot be advertised in a way that causes confusion with medicines nor claim that it is a substitute for curative medicines.

## 5. SUPPLEMENTARY NUTRITION INFORMATION

There are currently no supplementary nutrition information or specific fortification logos used in Vietnam.

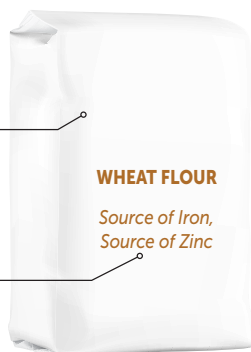
## 6. PICTORIAL CASE STUDY PRODUCT – BROWN WHEAT FLOUR

This case study product only details the two nutrition label types outlined in this fact sheet – nutrient declaration and nutrient content claim – along with a product name. 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

Nutrient content claim



Back of pack

Nutrient declaration

The image shows the back of a white bag of wheat flour with a table of typical nutritional information. A line points from the text "Nutrient declaration" to the table.

TYPICAL NUTRITIONAL INFORMATION		
Serving size: 100g (uncooked)		
		Per serving
Energy	(kJ)	1455
Protein	(g)	13.8
(Starch available)	(g)	13.8
Carbohydrate	(g)	69.2
Of which total sugar	(g)	—
Total fat	(g)	2.0
Of which saturated fat	(g)	0.3
Of which trans fatty acids	(g)	0
Total dietary fibre	(g)	7.9
Sodium	(mg)	3
Vitamin A	(mg)	242
Thiamin	(mg)	0.38
Riboflavin	(mg)	0.25
Niacin	(mg)	5.68
Pyridoxine	(mg)	0.33
Folic acid	(mg)	234
Iron	(mg)	4.80
Zinc	(mg)	2.67

## 7. MORE DETAIL ON THE LABELLING REGULATIONS

**Law on Food Safety, 2010** is the umbrella law that guides food safety, food production and trading, food import and export, food advertisements and labelling, and food testing and analysis (among other things).

- **Decree 15/2018/ND-CP Elaboration of Some Articles of the Law of Food Safety** sets out registration and certification requirements for food manufacturers and sellers in Vietnam and food inspection processes and limits some advertising (including label) contents.

**Law on Advertising, 2012** sets out requirements for advertising (including printed) products in Vietnam, including requiring foods or food additives to be advertised to hold a certificate of registration of quality, hygiene, and safety or to notify the competent state body that standards are met. The law also bans some advertisements, including advertising that would have a negative effect on the health or normal development of children.

- **Decree No. 181/2013/ND-CP on Elaboration of Some Articles of the Law on Advertising** sets out requirements for advertisements for foods and food additives, including that they state that "This product is not a medicine and is not a substitute for medicines".

**Decree No. 43/2017/ND-CP on Goods Labelling** (as amended by **Decree No. 111/2021/ND-CP**) sets out general labelling requirements (e.g., name of goods, ingredients, lettering height, labelling in Vietnamese), with the Ministry of Science and Technology the implementing department alongside People's Committees managing and inspecting goods labelling in their jurisdictions. Decree No. 111 also requires that nutritional composition and values are labelled according to Ministry of Health guidance for processed and pre-packaged foods – the response to which is the draft regulations detailed below.

**Circular No. 43/2014/TT-BYT Providing for Management of Functional Foods** sets out general requirements and requirements to make nutrition and health claims for supplemented foods (i.e., voluntarily fortified foods).

**Circular No. 34/2014** on detailed guidelines on labelling of packed foods, food additives, and food processing aids sets out general labelling requirements (e.g., ingredients in ascending order of weight or weight proportion, product name, size of lettering), nutrient content claims, and proscribes misleading or deceptive labelling.



## Draft Circular – Guidelines for nutrition labelling of foods G/ TBT/N/VNM/219

sets out mandatory nutrient declarations for food produced and imported into Vietnam. As at May 2023, the Ministry of Health stated that it has accepted a range of comments on the draft (e.g., re nutrient reference values (NRVs), mandatory requirements to label foods with percentages of NRVs) and will conduct further technical discussions with government and industry to progress the draft. It is anticipated that this new law will be passed in 2023 and come into force in 2024-25.

As an ASEAN Member State, a set of non-binding regional guidelines, principles and standards are applicable to Vietnam'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 Health (MOH)** has overall responsibility for setting nutrition labelling regulation in Vietnam. **The Vietnamese Food Administration (VFA)** and the **Ministry of Industry and Trade (MOIT)** implements the regulations above.

Vietnam Government regulations can be searched at <https://thuvienphapluat.vn/en/>

The US Department of Agriculture's (USDA) Foreign Agricultural Service issues a Food and Agricultural Import Regulations and Standards Country Report for Vietnam on a regular basis. See their **Vietnam page** to access the latest report.

The Global Fortification Data Exchange's **Vietnam Fortification dashboard** provides more detail about food fortification in the country.

