

## SECTION 2: Conceptual framework for best-practice nutrition labelling and overall analysis

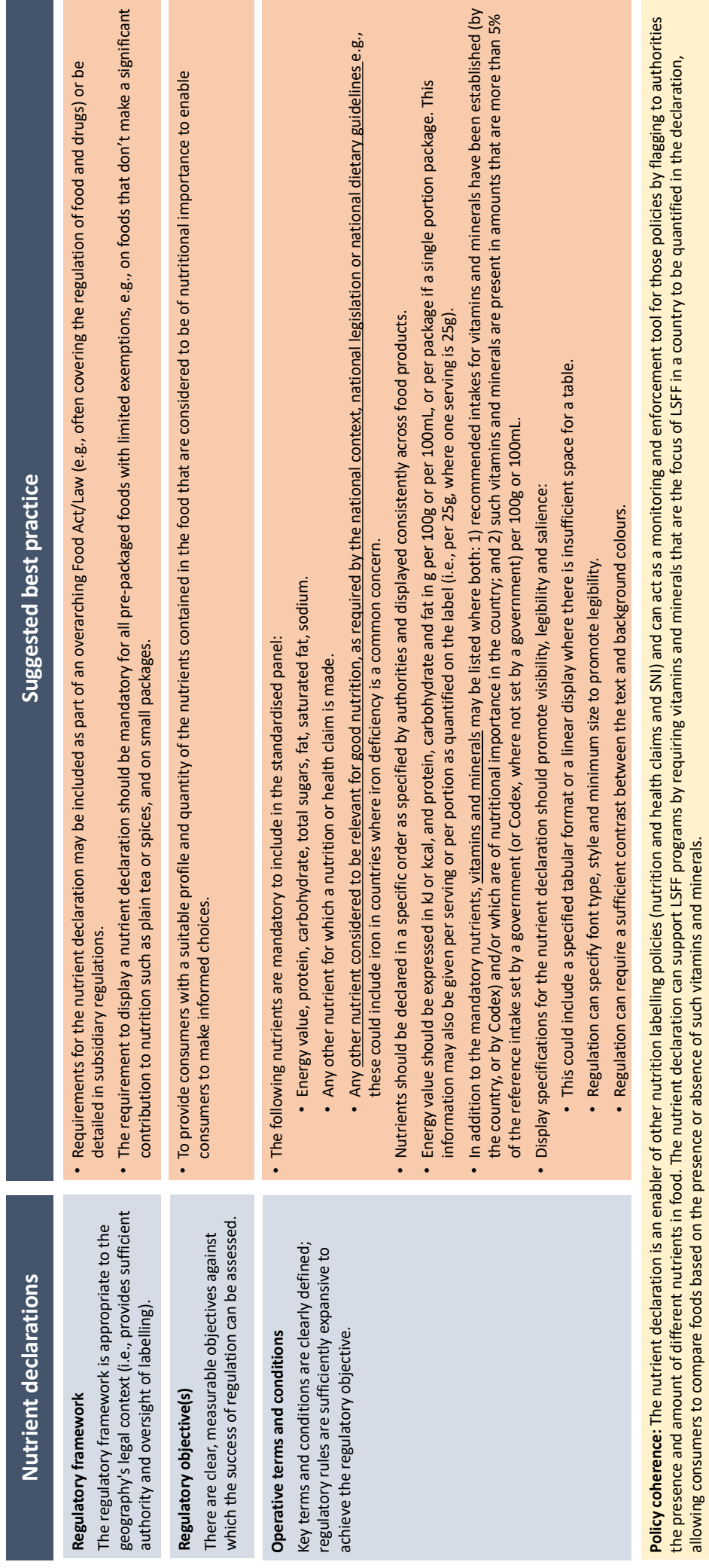
### A conceptual framework for best practice nutrition labelling

To develop a conceptual framework for best-practice nutrition labelling regulations in the context of LSFF, we adapted and applied Reeve and Magnusson's framework for analysing and improving the performance of public health law.<sup>4</sup> The full conceptual framework is provided in the Annexure and can be used as a tool for examining nutrition labelling regulations in additional geographies. For this report, we used the conceptual framework to extract data on key components of nutrition labelling regulations at global and geographic levels. In the tables below, we summarise our findings on best practices for each nutrition labelling type (see page 9, Figure 1 for reference), and for regulatory governance processes. Best practices are based on our analysis of nutrition labelling regulatory regimes at the global level and in the two comparator geographies.



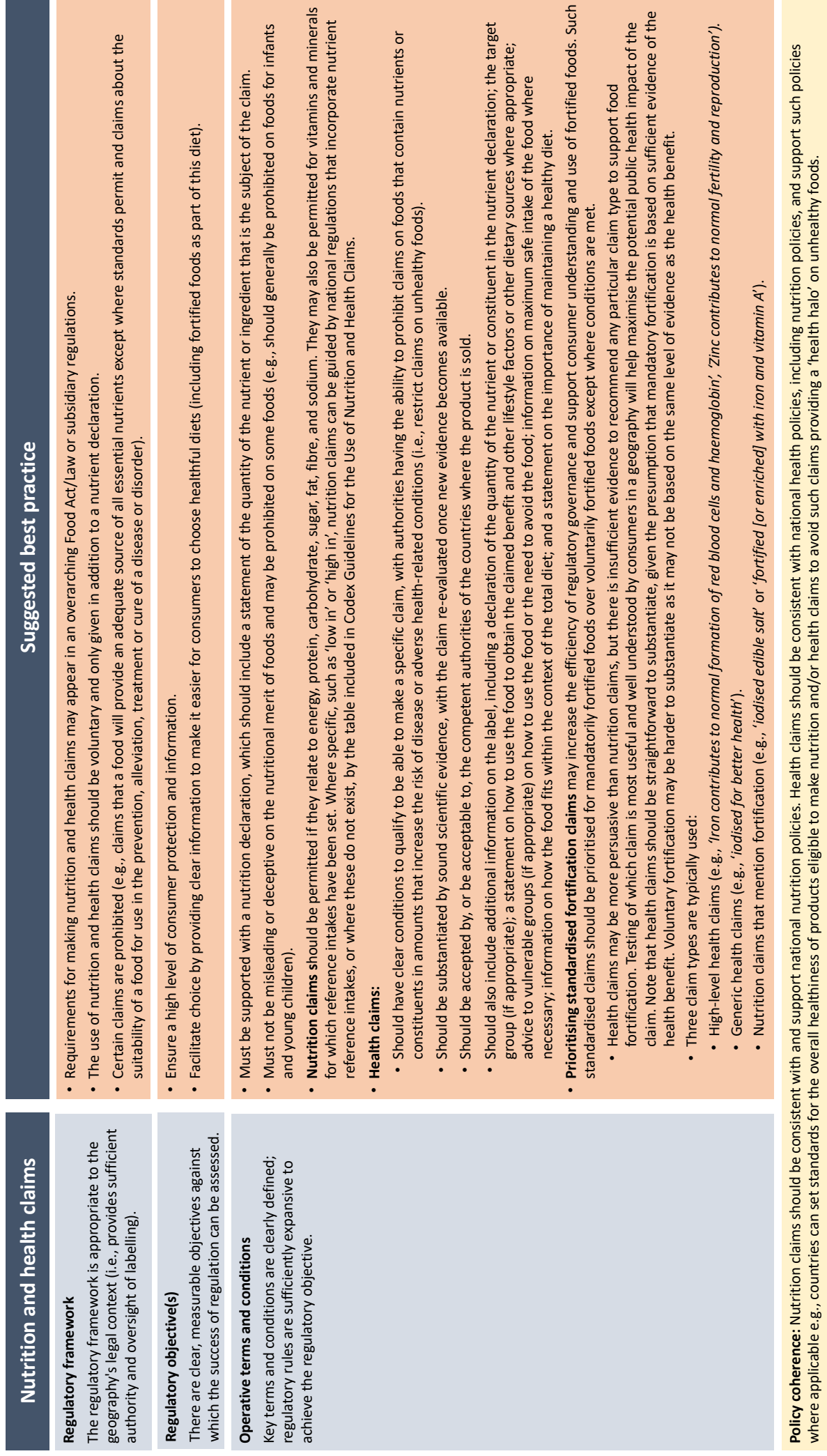
**Figure 3: Nutrient declaration: conceptual framework for best practice in the context of LSFF**

For an example of a nutrient declaration see page 9, Figure 1 for reference.



**Figure 4: Nutrition and health claims: conceptual framework for best practice in the context of LSFF**

For an example of a nutrition claim and a health claim see page 9, Figure 1 for reference.



**Figure 5: Food fortification logos: conceptual framework for best practice in the context of LSFF**

For an example of a fortification logo see page 9, Figure 1 for reference.

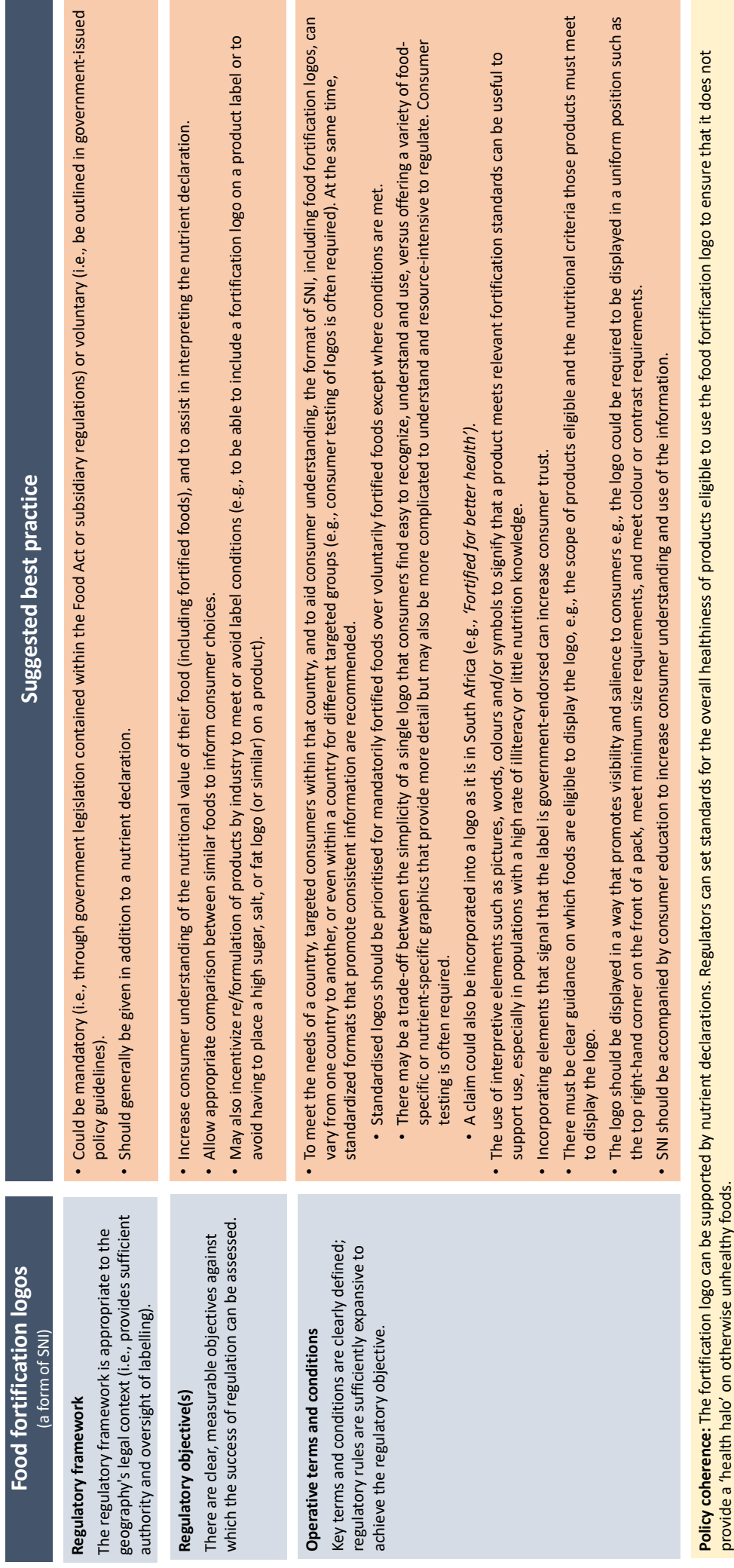
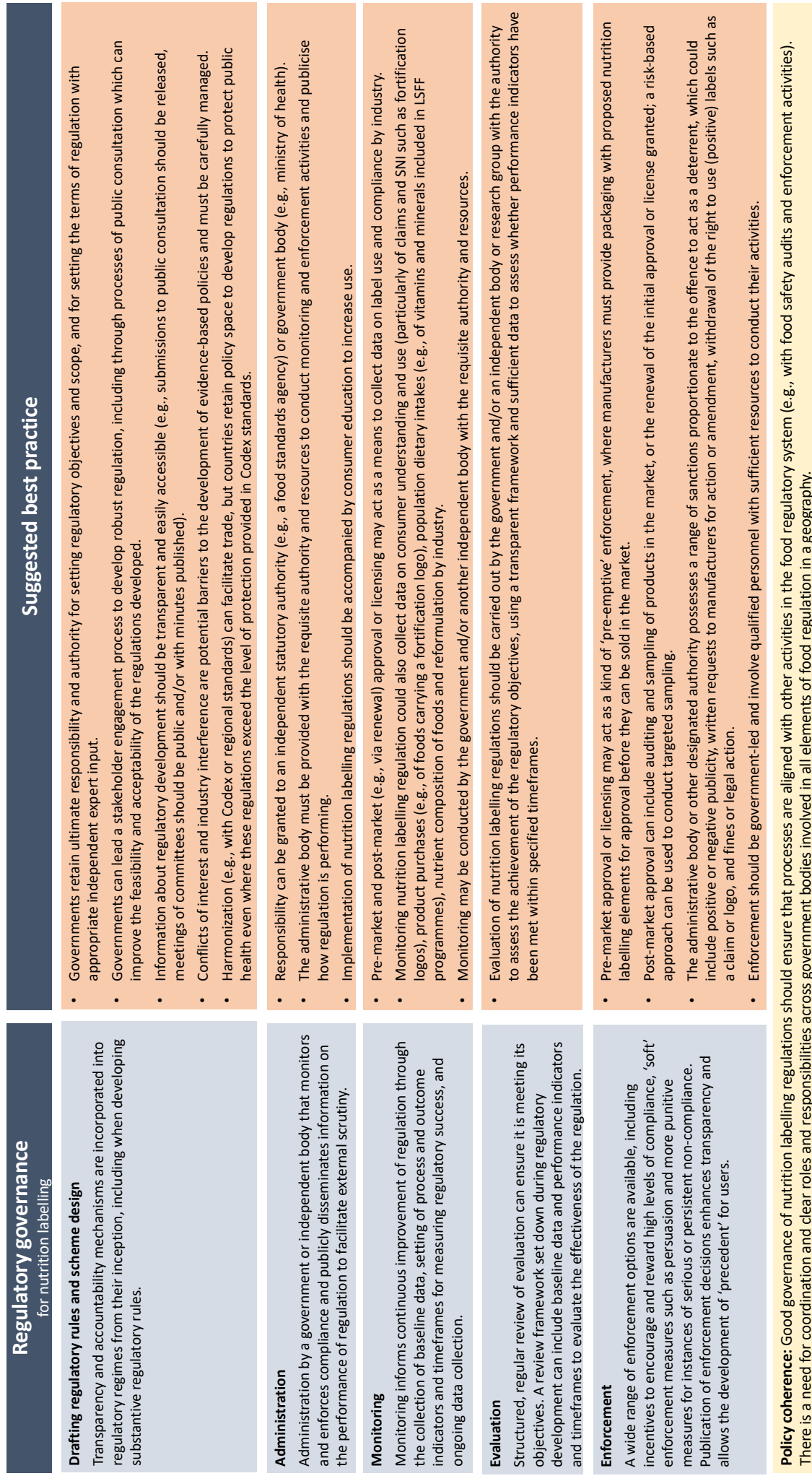


Figure 6: Regulatory governance: conceptual framework for best practice in the context of LSFF



**Nutrition labelling: current practice and overall recommendations to support LSFF across nine study geographies**

Here we detail trends in current nutrition labelling regulatory practice across the nine study geographies, noting how this practice may act as a barrier or enabler to LSFF. We highlight opportunities for different stakeholders to strengthen nutrition labelling regulations to support LSFF as recommendations, drawing upon *Figure 2: Theory of Change*. This analysis is presented at a glance in *Figure 7: Traffic light reporting* and is detailed for each country in section three of the report. Some geographies we reviewed – Ethiopia, Indonesia, some provinces of Pakistan, and South Africa – are at various stages in the regulatory reform cycle, having for example, issued draft laws or just promulgated laws but have not yet specified lower-level regulatory documents that provide detail on what is required by nutrition labelling. We have summarised this in the analysis below, and more detail sits in each country chapter.

Trends in current nutrition labelling practice of relevance to LSFF

- Just over half of the study geographies and one province of Pakistan mandate the use of nutrient declarations across nearly all pre-packaged foods and require the inclusion of vitamins and minerals in this declaration, provided they meet minimum levels, in line with best practice. Ethiopia's new fortification standards may mandate them on fortified foods. In Pakistan, nutrient declarations are voluntary in all provinces except Punjab. Thailand's regulations look to cover the field, but there are possible gaps depending on how its laws are interpreted. In Vietnam, declarations are voluntary, but a draft circular making them mandatory may become law soon.

**Recommendation:** Filling this regulatory gap should be the highest priority where gaps exist, as nutrient declarations promote transparency in the food supply for the purposes of monitoring compliance. Nutrient declarations are also a necessary precursor to the use of nutrition and health claims and SNI on foods.

- Similarly, all geographies permit *voluntary nutrition and health claims*, including nutrient claims for vitamins and minerals where the vitamin or mineral in a food meets specified levels, in line with best practice. Some geographies also have claims of fortified, enriched, or supplemented which in some cases must follow a generic statement. For example, in Punjab in Pakistan, a claim must be written as *"This food is (state which enriched, fortified, vitaminised, supplemented, or strengthened) with (state the vitamins or minerals or both and their amount in units per the regulation)"*. Only two geographies (South Africa and Nigeria) have standard fortification claims that link to health benefits. For example, in Nigeria, food labels that contain sufficient calcium or phosphorous must state that it "Contains calcium and/or phosphorous that is a factor in the normal development and maintenance of bones and teeth especially in children". In South Africa, broader claims such as such as *"fortified for better health"* exist. Other geographies such as various provinces in Pakistan and Ethiopia have very little regulation of claims.

**Recommendation:** Prioritising standardised claims for mandatorily fortified foods (e.g., 'iodised for better health' based on food containing a required level of a micronutrient) may increase the efficiency of regulatory governance and support consumer understanding and use of fortified foods. This can also be considered for voluntarily fortified foods in certain circumstances.

- **Fortification logos** were identified in four geographies (Kenya, Nigeria, the Philippines and South Africa) and recent fortification legislation in three provinces of Pakistan mandates fortification logos to be established by relevant provincial food authorities. A fortification logo may also be included in Ethiopia's new fortification standards. Several geographies had FOPNL for foods high in salt, sugar, fats and sodium to address over-nutrition. No regulation of *SNI* was identified in Vietnam and some provinces of Pakistan. Some geographies also have a national standard mark that demonstrates general compliance with relevant food standards, including labelling standards.

**Recommendation:** Alongside or instead of standardised claims for fortified foods, voluntary or mandatory application of a standard fortification logo or logos to visually signal that specific products are fortified may be useful to consider in geographies that do not currently have such logos. Priority should be given to logos for mandatorily fortified foods as this signals government endorsement of a healthier food choice in line with public health objectives, although they may apply to voluntarily fortified foods in some circumstances. If logos are considered for voluntarily fortified foods, governments could consider differentiating such logos from those for mandatorily fortified foods (e.g., the Philippines uses a Diamond Sangkap Pinoy Seal for mandatorily fortified foods and a rectangular Sangkap Pinoy Seal for other foods fortified with iron, vitamin A and iodine).

- We examined trends across how regulations are governed, or *regulatory governance archetypes*, (i.e., the surveillance system used by a regulator to administer, monitor and enforce nutrition labelling requirements, and the timing of such approvals and surveillance). Most (seven) geographies operate *pre- and post-market surveillance systems* for food products, including labelling. This occurs via both business and product licensing, and sometimes the pre-approval of food product advertisements. Surveillance is generally undertaken by the national standards body (e.g., Kenya Bureau of Standards or KEBS) and/or the national food and drug regulatory agency (e.g., the equivalent of the Food and Drug Regulatory Authority in the US). Vietnam operates a *self-declaration pre-market surveillance system with post-market surveillance* conducted by the relevant regulatory authorities. In Pakistan, this surveillance system is managed predominantly by provincial food authorities and except for fortified foods only operates at the food business level, not at a product level, in Sindh, Balochistan and Khyber Pakhtunkhwa. Based on available information, South Africa appears to operate a *post-market surveillance system only*.
- Where a *regulatory authority for food labelling* sits – with a food and drug regulatory agency (as is often the case), a standards body, or with the Minister/Ministry of Health – can determine the *structure of nutrition labelling regulations*. For example, if regulatory authority largely sits with a standards body such as KEBS, most labelling regulations are found in Kenyan Standards that sit under the law establishing KEBS and its powers and functions.
- Some geographies' nutrition labelling regulations also closely interact with *regional standards*. This can be seen most clearly in Kenya, which must adopt East African Standards into national law without deviation within six months of a standard being declared by the East African Standards Committee. Many of Kenya's standards are East African Standards that have been adopted directly as Kenyan standards. The Economic Community of West African States (ECOWAS) has standards for labelling and fortification, but it is not mandatory for member states to adopt them. In contrast, while the Association for Southeast Asian Nations (ASEAN) member states must evaluate regulation to ensure it is compatible with ASEAN nutrition and food security policy, we found little by way of specific regional labelling regulation that influences ASEAN member states' national food labelling regulations. The same can be said for countries that are part of the Common Market for Eastern and Southern Africa (COMESA).
- We garnered far more detail on the regulatory governance for the geographies in which we conducted surveys and interviews. In these focus geographies, we learned that *what happens in practice may not be what is written in relevant laws and regulations*. In several geographies, respondents told us that additional funding, human resources, laboratory capacity and/or training may be needed for a nutrition labelling regulatory regime to be operating optimally. We also heard that regular and ongoing education is required to ensure that the public understands and uses nutrition labelling and that industry players, regardless of their size, understand and can comply with regulatory requirements.

**Recommendation:** This finding is consistent with our previous work in both low- and high-resource settings globally, for example, our work for the WHO South-East Asia Region on Monitoring and Enforcing Food Regulations in that region.<sup>6</sup> In looking to strengthen labelling regulations, it is critical that stakeholders consider their local context (e.g., nutrition, health, and political context, and the available human and financial resources) to prioritise investment. There may be trade-offs, for example, between improving the regulatory governance of existing regulations, and/or amending or developing new regulations to align with best practice. Assuming there are limited resources and budget for nutrition labelling regulation, we recommend a risk-based approach that considers country priorities and the available resources to maximise effectiveness.

### Section references

4. Reeve B, Magnusson R. Regulation of food advertising to children in six jurisdictions: a framework for analyzing and improving the performance of regulatory instruments. *Arizona journal of international and comparative law*. 2018;35(1):71.
5. World Health Organization. Food fortification Geneva, Switzerland: World Health Organization,; 2023 [Available from: [https://www.who.int/health-topics/food-fortification#tab=tab\\_1](https://www.who.int/health-topics/food-fortification#tab=tab_1)].
6. Maganja D, Jones A, De Silva A. An e-learning course to support monitoring of food industry compliance with regulation to promote healthier diets in South-East Asia (Abstract). *World Congress on Public Health; Rome: Population Medicine*; 2023.

**Figure 7: Traffic light reporting of study geographies' current fortification regimes, nutrition labelling regulations, regulatory governance archetype and recommendations to strengthen nutrition labelling to support LSFF**

To see more detailed recommendations and recommendations on regulatory governance please refer to the recommendations under each study geography in section three of this report.

Country	Mandatory fortification	Voluntary fortification	Nutrient declaration	Nutrition and health claims	SNI (e.g., fortification logo)	Regulatory Governance Archetype for labelling	Recommendations to strengthen nutrition labelling to support LSFF to be considered in country context (excl. governance)
<b>Ethiopia*</b>	Wheat flour, edible oils and salt.	Unclear but the Ethiopian Food Authority can require fortification / adopt fortification standards.	<b>Voluntary nutrient declaration but fortified foods must include a statement stipulating the vitamin or mineral used in fortification</b> (unclear if this is required in an ingredient list or declaration). <i>We understand new fortification standards will shortly mandate nutrient declarations on fortified foods, but we were unable to access full versions.</i>	<b>Voluntary nutrition and health claims</b> , but not highly regulated (e.g., no requirement for a food to contain a minimum amount of a nutrient to make a claim). Some claims are prohibited (e.g., cannot imply a food can prevent or treat disease). <b>No standard fortification claims</b> , but a mandatorily fortified food must be labelled as <b>"fortified"</b> .	<b>No fortification logo</b> but any <b>information or pictorial device</b> may be displayed, provided it does not conflict with mandatory requirements in the same standard or would mislead or deceive consumers. <b>A National Standard Mark</b> indicates a product is standard-compliant including re-labelling. <i>We understand a fortification logo is in development and that it may exist in the new fortification standards.</i>	<b>Pre- and post-market surveillance</b> The Ethiopian Food and Drug Authority conducts pre- and post-market surveillance by requiring all foods to be registered with the EFDA via a certificate of competency. The Institute for Ethiopian Standards permits use of the National Standard Mark on application.	<b>Nutrient declarations</b> should be made mandatorily for all processed foods, including for fortified foods (this may be achieved via the new fortification standards). The declaration should mandate inclusion of fortifiants where food is fortified in line with standards. <b>Voluntary but standardised fortification claims and/or voluntary or mandatory fortification logos</b> could be considered for mandatorily fortified foods. Broader <b>claims regulation</b> could also consider setting requirements for nutrition and health claims in line with best practice, e.g., for specific nutrients (or vitamins and minerals) and based on levels of nutrient reference intakes.
<b>Indonesia</b>	Wheat flour, salt, and palm oil.	None identified.	<b>Mandatory nutrient declaration for all processed foods including fortified foods. Vitamins and minerals</b> can be included if present in an amount $\geq 2\%$ of the RDA, if a label includes statements that food contains vitamins and minerals or if required by legislation mandating fortification.	<b>Voluntary nutrition and health claims</b> (including 'source of' claims provided they meet a minimum RDI) are permitted only if they meet certain conditions. Some claims are prohibited. <b>No standard fortification claims but permits statements that a food has been fortified, enriched, or supplemented</b> provided they do not mislead (i.e., where the statement confers a commercial but not a consumer benefit).	<b>No fortification logo</b> , but an Indonesian National Standard (SNI) mark is mandatory on fortified foods (and several other foods) to demonstrate conformity with the SNI. A <b>'Healthier Choice' logo</b> can be used if foods meet nutrient profiling criteria.	<b>Pre- and post-market surveillance</b> Indonesia's National Agency of Drug and Food Control (BPOM) must approve all processed foods for trade (inclusive of labelling) via a pre- and post-market surveillance system that requires renewal.	<b>Voluntary standard fortification claims and/or voluntary or mandatory fortification logo(s)</b> could be considered for mandatorily fortified foods.
<b>Kenya*</b>	Wheat flour, dry-milled maize, salt, edible fats and oils.	Where no Kenyan fortification specifications exist, Codex specifications apply.	<b>Mandatory nutrient declaration for all pre-packaged foods</b> (with minor exceptions, e.g., foods of nutritional insignificance like spices and condiments) and foods on which a health or nutrition claim is made. <b>Vitamins or minerals</b> can be included if present in a minimum amount (e.g., $\geq 5\%$ of NRV per 100g/ml).	<b>Voluntary nutrition and health claims</b> are permitted provided they meet conditions. Some claims are prohibited. <b>No standard fortification claim but permits nutrient claims for vitamins and minerals</b> if conditions are met (e.g., can only claim 'source of' where a vitamin is $\geq 15\%$ of NRV per 100g). <b>A draft traffic-light FOPL</b> is under review.	<b>A voluntary fortification logo (Fortification Mark of Quality)</b> can be applied for and is allowed only if a food meets fortification standards. <b>A Standardization Mark</b> is required prior to placing a food on the market. A <b>Diamond Mark of Quality and Import Standardization Mark of Quality</b> are also available. <b>Voluntary SNI</b> can also be used if a food meets conditions.	<b>Pre- and post-market surveillance</b> The Kenya Bureau of Standards (KEBS) requires all businesses to register to obtain a Standardization Mark before food is placed on the market. The mark requires renewal, and KEBS encourages concurrent application for the fortification logo.	<b>Voluntary standard fortification claims</b> for mandatorily fortified foods could be considered to add to existing fortification logos and increase consumer understanding of the benefits of fortified foods. <b>If claims regulations</b> were updated, stipulations on health claims could be considered to improve regulations.



Country	Mandatory fortification	Voluntary fortification	Nutrient declaration	Nutrition and health claims	SNI (e.g., fortification logo)	Regulatory Governance Archetype for labelling	Recommendations to strengthen nutrition labelling to support USFF to be considered in country context (excl. governance)
Nigeria	Salt, sugar, wheat and maize flour, enriched vegetable oil, margarine and butter – along with others in regulations.	Several foods can be voluntarily fortified (e.g., enriched elementary pasta can be voluntarily fortified and must be fortified with specific micronutrients)	<b>Mandatory nutrient declarations on all pre-packaged foods. Vitamins and minerals</b> can be included if they meet conditions (e.g., ≥5% of NRV / serve). <b>Mandatorily fortified foods must include the amount of vitamin and/or mineral</b> added to the food in the declaration.	<b>Voluntary nutrition and health claims</b> are permitted provided they meet conditions. Some claims are prohibited. This includes <b>voluntary nutrition claims for vitamins and minerals</b> (e.g., 'a source', 'excellent diet source') if a % NRV is met. <b>Mandatory standard fortification claims for calcium, phosphorus and/or iron</b> (e.g., that it is a factor in the maintenance of good health, or re calcium or phosphorus only that it is a factor in the normal development and maintenance of bones and teeth especially in children). Salt must be labelled as 'salt fortified with iron' or other names.	<b>Mandatory fortification logo</b> for foods mandatorily fortified with vitamin A and a <b>mandatory iodised salt logo</b> for iodised salt. A regional 'Enrichi' logo is available for wheat flour and cooking oil fortified with vitamin A as part of an ECOWAS program. A priority of the National Multi-Sectoral Action Plan for the Prevention and Control of NCDs (2019) is to adopt standards for <b>FOPNL</b> .	<b>Pre- and post-market surveillance</b> All fortified, processed and any foods to be advertised (including labelling) in Nigeria must be registered with the National Agency for Food and Drug Administration and Control (NAFDAC), with renewal required.	Increased attention should be paid to the interaction of fortification and food labelling to <b>ensure that policies and regulations coherently address over- and under-nutrition</b> . At this time, given existing fortification logos and claims and government consideration of <b>FOPNL</b> , we <b>do not recommend additional fortification logos or claims be considered</b> unless care is taken to align and coordinate these policies to enhance consumer understanding/mitigate potential confusion (e.g., this may be improved through a consolidated logo for claims such as in South Africa). Further, if <b>claims regulations</b> were updated, stipulations on health claims could be considered to improve regulations.
Pakistan	Edible oil.	Unclear but standards exist for iodised salt, enriched wheat flour and self-raising flour.	<b>Voluntary nutrient declaration.</b> No requirements on inclusion of vitamins or minerals.	Little regulation of claims but imported products claiming to be a source of vitamins and minerals must be registered in Pakistan. <b>No standard fortification claims.</b>	<b>No regulation identified.</b>	<b>Pre- and post-market surveillance (at food business level in general but for specific fortified foods in Sindh, Balochistan, Khyber Pakhtunkhwa provinces)</b> Little nutrition labelling regulation was identified in Pakistan outside of Punjab. However, the federal government regulates and implements food safety standards for food imports. Provincial food authorities regulate and implement food safety standards for domestic food products via mandatory food business licensing systems that require renewal.	<b>Mandatory nutrient declarations (highest priority)</b> for all processed foods, including fortified foods, that mandate the inclusion of fortificants wherever fortified, in line with standards. To help consumers more easily identify fortified foods beyond a label stating that food is enriched, fortified or supplemented with vitamins or minerals, <b>voluntary standard fortification claims and/or a voluntary or mandatory fortification logo</b> could be considered for mandatorily fortified foods and should ideally be aligned nationwide (except where they already exist in Punjab, Sindh, Balochistan, Khyber Pakhtunkhwa). At least <b>setting basic requirements for general claims</b> (e.g., for nutrition claims such as 'source of') and <b>prohibitions on specific claims</b> (except where they exist in Punjab).
Sindh, Balochistan, Khyber Pakhtunkhwa provinces, Pakistan	Vanaspati Ghee or edible oil, what flour/maida, atta, fine atta and suji. Salt in Balochistan only.	-	<b>Minimum essential information</b> about the mandatorily fortified food as specified by the Food Authority. <i>This may mandate a nutrient declaration.</i>	<b>No regulation identified</b> but advertisements re mandatorily fortified food must protect the consumer from <b>false and misleading claims</b> .	<b>Mandatory fortification logo</b> to be displayed on the pack of a mandatorily fortified food as prescribed by the Food Authority.		
Punjab province, Pakistan	Vegetable fats and oils, wheat flour/maida and atta.	Several foods can be voluntarily fortified. Salt can be voluntarily iodised.	<b>Mandatory nutrient declarations</b> and must include quantities of <b>vitamins and minerals</b> .	<b>Voluntary nutrition claims that a food is enriched or fortified</b> (e.g., <i>This food is (state which, enriched, fortified, vitaminized, supplemented or strengthened) with (state which, vitamins or minerals or both and their amount in units expressed per the regulation)</i> ) provided it meets a minimum amount. Some claims are prohibited.	<b>No regulation of nutrition labels</b> was identified, but the <b>mandatory Punjab Food Authorized Logo</b> demonstrates that a food meets labelling and other food standards.		
Philippines*	Salt, rice, wheat flour, refined sugar, cooking oil and other staple foods as required by the National Nutrition Council and regulated.	Encourages fortification of foods widely consumed by at-risk groups, such as cereals and cereal-based products including snack foods and instant noodles.	<b>Mandatory nutrient declaration on packaged foods and fortified staple foods.</b> Key nutrients and <b>vitamins or minerals</b> added during fortification must be specified.	<b>Voluntary nutrition and health claims</b> permitted provided they meet conditions (e.g., 'source', 'high' if they meet specified %s of NRV). Any claims not covered by regulations can be approved via application to the FDA. Some claims are prohibited. <b>Claims that a food is enriched/fortified with vitamins and/or minerals</b> can only be made when the amount of added vitamin and/or mineral accords with fortification guidelines and is in the declaration. <b>Iodised salt</b> must be declared on labels.	<b>Three Sangkap Pinoy Seal fortification logos</b> that can only be used on foods containing minimum amounts of fortificant(s): - <b>Mandatory Saktong Iodine sa Asin Seal logo</b> on iodised salt - <b>Diamond Sangkap Pinoy Seal</b> for staples covered by mandatory food fortification - <b>Voluntary Sangkap Pinoy Seal</b> for other foods fortified with iron, vitamin A and iodine [but see recommendation re coherence]. <b>Voluntary FOPNL</b> allowed outlining energy content in calories of a food.	<b>Pre- and post-market surveillance</b> All products must be registered with the Food and Drug Administration (FDA), which also involves a review of labelling. Use of Sangkap Pinoy Seals is subject to FDA approval, including for the mandatory iodised salt logo. Mandatory licences to operate food businesses sit alongside product and labelling regulation and oversight.	Increased attention should be paid to the interaction of fortification and food labelling to <b>ensure that policies and regulations coherently address over- and under-nutrition</b> - including use of the Voluntary Sangkap Pinoy Seal. If deemed useful to enhance consumer understanding of fortified food, additional specific <b>voluntary standard fortification claims</b> (including health claims) for mandatorily fortified foods could be considered to add to existing fortification logos and existing claims for fortified foods. This recommendation could be considered for voluntarily fortified foods in certain circumstances.

Country	Mandatory fortification	Voluntary fortification	Nutrient declaration	Nutrition and health claims	SNI (e.g., fortification logo)	Regulatory Governance Archetype for labelling	Recommendations to strengthen nutrition labelling to support LSFF to be considered in country context (excl. governance)
South Africa*	Salt, wheat flour, wheat bread, maize meal and unsifted maize meal.	-	<b>Mandatory nutrient declaration where nutrition claims are made and for fortified foods and iodised salt.</b> Declarations are voluntary for all other foods. <i>Draft legislation would make nutrient declarations mandatory for nearly all food products, including mandatorily fortified foods.</i>	<b>Voluntary nutrition and health claims</b> are permitted provided they meet conditions (e.g., 'very high in', 'high in', 'course of' if vitamin or mineral meets specified % of NRV). Some claims are prohibited. <b>Standard fortification claims</b> for iodised salt, maize meal, wheat flour, and 'fortified for better health' provided food is fortified per regulations. <i>Draft legislation would impose new criteria for voluntary nutrition and health claims including use of a nutrient profiling model for South Africa to screen foods for claim eligibility.</i>	<b>Official fortification logos are voluntary</b> provided food is fortified per regulations: 'Iodated for better health', 'Fortified for Better Health', 'Manufactured with fortified maize meal for better health', 'Manufactured with fortified wheat flour for better health'. <i>Draft legislation would create a new mandatory FOPNL for foods high in salt, sugar, saturated fat and/or containing artificial sweeteners.</i>	<b>Post-market surveillance</b> Administration of all food regulation is assigned by the Department of Health to local municipalities and food health inspectors at ports of entry.	if <b>draft labelling regulations</b> out for comment until end April 2023 are implemented, South Africa's labelling regulations would broadly cover the field from a nutrition perspective.
Thailand	Salt	Rice can be voluntarily biofortified.	<b>Mandatory nutrient declarations for certain categories of food</b> (include foods making a nutrition claim, foods that make use of nutritional values in promotions, foods that target a group of consumers and other foods which may be specified by the FDA). Must include in g/mg and RD1 %: <b>vitamin A, B1 and B2, calcium, iron.</b>	<b>Voluntary health and nutrition claims</b> permitted if meet conditions similar to Codex and US FDA standards. E.g., 'excellent source of' claims allowed if meet a minimum RD1 and nutrient function claims such as 'Vitamin B1 and vitamin B12 assist in function of nervous system' are subject to FDA approval. Some claims are prohibited. <b>Comparative claims of "...enriched, fortified"</b> (excluding sodium) when compared to a reference food if the nutrient content meets a specified level. Edible iodised salt must state: ' <b>iodized edible salt</b> '.	<b>No standalone fortification logo</b> was identified. <b>'Guideline Daily Amount' FOPNL</b> label is mandatory for specific food categories and voluntary for other foods. Voluntary ' <b>Healthier Choice' FOPNL</b> can be applied where a product meets nutrition criteria (for energy, fat, sugar and sodium) to be considered a healthier choice within certain categories.	<b>Pre- and post-market surveillance</b> Manufacturers and importers must obtain a license (that requires renewal) from the FDA prior to food manufacturing or importing to ensure foods meet standards (including nutrition labelling). The FDA must also approve any food advertising.	To bring Thailand into alignment with Codex standards and best practice, <b>nutrient declarations</b> should be made mandatory for all processed foods with limited exceptions. It is unclear whether current regulations achieve this in practice. Thailand could consider a <b>mandatory salt iodisation logo</b> on foods. Prioritisation of this action may depend on the priority of salt iodisation to address iodine deficiency vs other nutrition interventions, given the additional regulatory burden to implement. Prioritisation may also account for current sodium intake levels that are being partly addressed by the sodium declaration as part of the Guideline Daily Amount style FOPNL.
Vietnam*	Edible salt and salt used in processed foods, wheat flour used in processed foods, specific vegetable oils.	Where deficiencies are not deemed a public health problem, voluntary addition of specific micronutrients is allowed.	<b>Nutrient declarations</b> are not required by current legislation in Vietnam. <i>A draft circular on nutrition labelling (including a mandatory nutrient declaration) was notified to the World Trade Organization in 2022 and is due to progress into law in 2023.</i>	<b>Voluntary nutrient content claims</b> permitted if conditions are met and advertisements (including labels) must be consistent with the effects of the product specified in the product declaration and must not use images of health facilities, physicians, pharmacists, health workers etc. Some claims are prohibited. <b>For voluntarily ("supplemented") fortified foods, nutrient content claims and health claims are permitted</b> if conditions are met (e.g., "source of" and "high in" claims if meet minimum RNI). Voluntarily fortified foods must be labelled as " <b>supplemented food</b> ", but <b>no standard fortification claims exist</b> .	<b>No regulation identified.</b>	<b>Self-declaration for most foods and post-market surveillance</b> Food suppliers that wish to sell pre-packaged processed foods (with separate requirements for specific foods, e.g., dietary supplements and medical foods) must submit a food-specific self-declaration to the relevant regulatory authority in the province to receive a <b>certificate of production registration</b> , which also requires every food manufacturer and seller to have a certificate of food safety.	Ideally, the proposed Circular that would introduce mandatory <b>nutrient declarations</b> should mandate inclusion of added vitamins and minerals. To help consumers more easily identify fortified foods beyond a label including the word 'fortified', voluntary, but standardised <b>fortification claims</b> and voluntary or mandatory <b>fortification logos</b> could be considered for mandatorily fortified foods. We do not extend this recommendation to relevant voluntarily fortified foods. if <b>claims regulations</b> were updated, stipulations on health claims could be considered to improve regulations beyond the existing regulation for voluntarily fortified or supplemented foods.