Nutrition Labeling and Claims: Regulatory Updates in Indonesia

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August, 2015

1. Regulation

Regulations
1. Law Number 36/2009 on Health
2. Law Number 18/2012 on Food
3. Government Regulation Number 69/1999 on Label and Advertising
4. Government Regulation Number 28/2004 on Safety, Quality, Nutrition of Food
5. Minister of Health Regulation No. 30/2013 on Inclusion of the Information Content of Sugar, Salt, and Fat and Health Information to Processed Food and Fast Food
6. Head of NADFC Regulation No: HK.03.1.23.11.11.09605 (2011) on Amendment to Head of NADFC Decree No: HK.00.06.51.0475 on Guidelines on Nutrition Information Uses on Food Label
7. Head of NADFC Decree Number HK. 03.1.23.11.11.09999 (2011) on The Control of Claim on Processed Food Labelling and Advertisement
2. Nutrition Labeling

Mandatory for:
- Fortified food; or
- Food with nutrition and/or health claim.

Voluntary for other foods

Nutrition Labeling

Serving size ------- (UTF) ------- (g/ml)
Amount of Serving per Container -------

AMOUNT OF SERVING
Total Energy ... kcal Energy from Fat ... kcal
Energy from Saturated Fat ... kcal

% NRV *
Total Fat ...... g ...... %
Saturated Fat ...... g ...... %
Mono-Unsaturated Fat ...... g
Poly-Unsaturated Fat ...... g
Trans Fat ...... g
Cholesterol ...... mg ...... %

Protein ...... g ...... %

Total Carbohydrate ...... g ...... %
Dietary Fiber ...... g ...... %
Soluble Dietary Fiber ...... g
Insoluble Dietary Fiber ...... g
Sugar ...... g
Alcohol Sugar ...... g
Other Carbohydrate ...... g

Sodium ...... mg ...... %
Potassium ...... mg ...... %

Vitamin A ...... %
Vitamin C ...... %
Other Vitamin ...... %
Calcium ...... %
Fe ...... %
Other Mineral ...... %

* Percent NRV based on energy requirement of 2000 kcal. Your energy requirement may be more high or more low.

Tolerance Level
To ensure consumer get information assurance of nutrition facts in accordance with the requirements of quality and nutrition.

Information on the nutrition facts of the food label must be proved by the results of nutrient analysis.
### Tolerance Level

**Requirements**

- **A. Fortified food or food with nutrition and or health claim**
  - Results of nutrient analysis ≥ 100% with Nutrition Facts

- **B. Food product that have maximum and or minimum limit**
  - Results of nutrient analysis must meet the requirements maximum and/or minimum

- **C. Food product with Nutrition Facts except in point A and B**
  - Results of nutrient analysis ≥ 80% with Nutrition Facts.

For all foods:
- energy, fat, saturated fat, cholesterol, trans fatty acid, sugar and sodium -> *not more* than 120% from value listed on the nutrition fact

### Types of Claims regulated

- **Nutrition Claim**
- **Health Claim**
- **Glycemic Index Claim**

Mandatory with Specific Requirement → related to amount, mandatory fortification or claims
**Nutrition and Health Claims**

**CLAIM** is any representation which states, suggests or implies that a food has particular characteristics relating to its origin, nutritional properties, nature, production, processing, composition or any other quality.

**Nutrition Claims**

- Nutrient Content Claim
- Nutrient Comparative Claim
- Nutrient Function Claim
- Other Functional Claim
- Reduction of Disease Risk Claim

**Nutrient Content Claim**

- a nutrition claim that describes the level of a nutrient contained in a food
- Example: "source of protein", "high of calcium"

**Nutrient Comparative Claim**

- a claim that compares the nutrient levels and/or energy value of two or more foods
- Examples: "reduced", "less than", "fewer", "increased", "more than"
any representation that states, suggests, or implies that a relationship exists between a food or a constituent of that food and health.

Nutrient Function Claims
- a nutrition claim that describes the physiological role of the nutrient in growth, development and normal functions of the body.
- Example: “Calcium necessary in the development of bone and teeth”

Other Function Claims
- These claims concern specific beneficial effects of the consumption of foods or their constituents, in the context of the total diet on normal functions or biological activities of the body. Such claims relate to a positive contribution to health or to the improvement of a function or to modifying or preserving health.
- Example: Dietary fiber may contribute to maintenance of a healthy digestive tract.

Reduction of Disease Risk Claims
- Claims relating the consumption of a food or food constituent, in the context of the total diet, to the reduced risk of developing a disease or health-related condition.
- Example: Folic Acid – Balance nutrient diet with sufficient intake of folic acid can reduce the risk of neural tube defect in infants.

Approved components:
1. Dietary Fiber
2. Phytostanol and Phytosterol
3. Folic Acid
4. Calcium
5. Sugar Alcohol (polyol)
6. Peptide and certain Protein (soy)
7. Isoflavon (soy)
8. Dietary Fiber
9. Phytostanol and Phytosterol

Other requirements
- Claim that are allowed as stated in the Regulation of BPOM → others should be evaluated case by case.
- Warning should be declared, if any.
- Claims used for advertising should be in line with the approved label.

Consistent with national nutrition policy and support that policy.
- truthful and non-misleading
- not encourage excessive consumption of any food or disparages good dietary practice
- not related with curative and preventive disease.
Glycemic Index:

- Value which reflects the rate of increase in blood glucose levels after eating food containing carbohydrates.
- The higher the GI, the higher the blood glucose levels after food is consumed.
- Rise in blood glucose levels determined by the amount of carbohydrates consumed (glycemic load).

BPOM will decide based on:
- the scientific evaluation and recommendation from Expert
- and other related consideration.

Claims other than those specified in the Regulation may be considered based on the scientific evidence.

Glycemic Index:

- Low: < 55
- Intermediate: 55 - 70
- High: > 70

Requirement:

- must contain available carbohydrates at least 40 grams per serving, not including dietary fiber
- Rise in blood glucose levels determined by the amount of carbohydrates consumed (glycemic load).
It is prohibited to:

- put **claims** on processed foods intended for babies
- put **other functions claim and disease reduction claim** for processed foods that are intended for children age 1 – 3 years old

- The health claim should not include a statement that the food consumption meet the needs of all essential nutrients
- Made used of consumer fears
- The health claim should not be made if it encourages or condones excessive consumption of any food or disparages good dietary practice
- The health claim should not illustrate that a nutrient or other component can prevent, treat or cure disease

Thank you