

Information on Food Labeling Requirements in Malaysia

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All pre-packed foods sold in our shops usually have colourful packaging designs, labeled with words, numbers and pictures. Is this information absolutely necessary or are they placed there to impress the customer? The content and design of food labels are to some extent governed by the Food Regulations to provide important and useful information to consumers so that they in turn can make informed choices. The following provides information on the labeling requirements of food sold in Malaysia gleaned from the Malaysian Food Regulations 1985 and Food Irradiation Regulations 2011 (as at March 2013)¹.

- ❖ **1. All labels shall be durably marked on the material of the package or on material firmly attached to the package.**



- 1.1 However, if a package is made of clear transparent material, then the label can be placed directly inside the package provided:

- the food in the package is not ready for direct consumption or
- if it is ready for direct consumption, food is to be completely enclosed in its natural shell or pod or interior wrapper.

- 1.2 For legibility, specific requirements for font size, style, contrasting colour of letterings have been prescribed in the Regulations for the labels.

(eg. font size in no smaller than 10 point lettering for most particulars; font size in no smaller than 4 point lettering for information on ingredients and nutritional labeling; no smaller than 2 point lettering for very small packages, etc.)

- ❖ **2. Language to be used for information required on the label depends on the country of origin as follows:**

- 2.1 Products of Malaysia

- Shall be labeled in Bahasa Malaysia AND may include translation in any other language.

- 2.2 All other imported foods

- Shall be labeled in Bahasa Malaysia OR English AND may include translation in any other language.

- ❖ **3. Important particulars expected to be on the label are as follows:**

- 3.1 **A description of the food** containing the common name of its principal ingredients, for eg. "Sweet Corn Cream Style", "Beef patties".

- In the case of food product being a mixed and blended food, the label shall indicate that the contents are mixed or blended, for eg. “Mixed vegetables”.
- Where beef, pork, lard or alcohol is present, the label shall bear as statement indicating its presence, for eg. “CONTAINS PORK” immediately below the name of the food.
- Where the food contains added alcohol a statement in the form:
 - o “CONTAINS ALCOHOL” or in any other words to this effect immediately below the name of the food.
 - o in capital bold-faced lettering of a non-serif character not smaller than 6 point

3.2 A list of Ingredients in the food (if it contains 2 or more ingredients) whereby:

- Ingredients shall be indicated in *descending* order of proportion *by weight*.
- If the food contains edible fat or edible oil, the *type* of oil or fat present shall be specified. For eg. Palm oil, vegetable oil (canola, corn, soybean).
- If food contains food additives (i.e. preservative, colouring substance, flavouring substance, and flavor enhancer, antioxidant and / or food conditioner) then a statement in the form “contains permitted (state type of the relevant food additive)” is required on the labeling.
- If the ingredients and additives are derived from animals, then the *common name of the animal* shall also be stated on the label, (eg. chicken meat), unless it can be inferred from the name of the ingredient or food additive (eg. beef).
- If the origin of food ingredients is obtained through modern biotechnology, then it shall be stated “gene derived from (common name of such animal).”
- According to Food Irradiation Regulations 2011, where an ingredient used had been irradiated and constitutes more than 5 per cent of the content of the packaged food, a statement in the form “IRRADIATED” shall be declared in the list of the food.

Note: Wherever the strength, weight or quantity of any ingredient or food is expressed as per cent, part per million, and parts per billion, the reference made will be by weight.

3.3 Allergens in food product to be declared:



- It is compulsory that ingredients known to cause hypersensitivity be declared on the label.
- The food or ingredients to be declared are:
 - o Cereal containing gluten including wheat, rye, barley and oat
 - o Nut and nut product including peanut and soybean
 - o Fish and fish product
 - o Milk and milk product including lactose
 - o Egg and egg product

3.3 Quantity of food in package is to be declared indicating:

- The minimum net weight, or volume or number of the content of the package.
- The minimum drained weight if the food is packed in liquid.

3.4 Information of the company responsible for the packed food:

- Product of Malaysia:
 - Name and address of the manufacturer / packer / the owner of the rights of the manufacture or packing or the agent.
- Imported food:
 - Name and address of the manufacturer / packer / the owner of the rights of the manufacture or packing or the agent.
 - Name and business address of the importer in Malaysia.
 - Name of the country of origin of the food.

3.5 Requirements for Genetically Modified (GM) Food and Food Ingredients

- Depending on its composition, words such “genetically modified (name of ingredient)”, “produced from genetically modified (name of ingredient)”, or “gene derived from (common name of such animal)” shall appear on the label.
- If it is a single GM-ingredient food, then the above mentioned information must appear on principal display panel, close to name of the food in not less than 10 point lettering.
- If one of the multiple ingredients is a GM food, then this information must appear in the list of ingredients following the ingredients and a statement “contains genetically modified ingredient” shall also be stated on the principal display panel, close to the name of the food in not less than 10 point lettering.

3.7 Requirements for Irradiated Food

- Every package containing irradiated food for sale shall bear on it a written statement proximately close to the name of the food in not less than 10 point lettering in one of the following forms:
 - “TREATED WITH IONIZING RADIATION”
 - “TREATED WITH IRRADIATION”
 - “TREATED BY IRRADIATION”
 - “IRRADIATED”
- Every package shall bear on it the international food irradiation symbol



❖ 4. **Date Marking** refers to a date permanently marked or embossed on the package or in label on the package in either one of the following formats:

- ✓ EXPIRY DATE or EXP DATE; USE BY; CONSUME BY or CONS BY
 - Means **the date after which** the food may not retain the quality attributes normally expected by a consumer, under recommended storage conditions.
- ✓ BEST BEFORE or BEST BEF
 - Means **the date until which** the food, will retain any specific qualities for which tacit or express claim has been made, under recommended storage conditions.

4.1 Date must be in a format that is correctly identifiable by consumers and not in a code form (such as for lot identification).

4.2 The date is to be expressed in day, month and year OR in month and year.

- If the date is expressed in month and year, then the expiry date or date of minimum durability shall be by end of month.

4.3 The date marking shall be in capital bold-faced lettering of a non-serif character not smaller than 6 point.

4.4 Not all food requires date marking. Food requiring date marking (as specified in the Fifth Schedule) are:

- Biscuit, bread
- Canned food for infants and young children
- Cereal-based food for infants and young children
- Chocolate, white chocolate and milk chocolate
- Coconut cream, coconut milk, coconut paste, coconut cream powder and desiccated coconut



- Edible fat and edible oil other than margarine in hermetically sealed containers
- Fish ball or fish cake
- Food additives of shelf-life of less than 18 months
- Infant formula
- Liquid egg, liquid egg yolk, liquid egg white, dried egg, dried egg yolk and dried egg white
- Low energy form of any food which requires date marking'
- Meat product in non-hermetically sealed containers
- Milk and milk product other than ice cream which is less than 200 ml in volume and hard cheese
- Non-carbonated pasteurized soft drink and non-carbonated U.H.T. soft drink
- Pasteurised fruit juice
- Pasteurised vegetable juice
- Peanut butter
- Sauce
- Seri kaya
- Special purpose food

4.5 Date-marking of food is ***not needed*** under the following situations:



- The package of food, which is of the nature, quality, quantity, origin or brand requested by the purchaser is weighed, counted or measured in the presence of the purchaser at the retail premise.
- Perishable cooked food ready for consumption which is packed on retail premises as requested by the purchaser.
- For eg. Food purchased from the day or night market, take aways from restaurants, hawkers.

❖ 5. Storage Conditions

If the *validity* of date marking of food is *dependent* on its storage, then the storage direction of that food shall also be required on its label.

KEEP FROZEN AT -18°C / GARDER CONGELE -18°C

STORAGE
Store in cool dry place.

❖ 6. Matters forbidden on any label

The following matters or words are forbidden on any label:

- 6.1 Contradicting descriptions or statements made on label.
- 6.2 Words indicating the grading, quality or superiority or any words of similar meaning unless the food complies with the requirements set by relevant authorities for that quality grading.
- 6.3 The word “pure” or any other words with the same implication unless:
 - The food is of the strength or purity prescribed in the standards of the Food Regulations and free from other added substances other than those required in the processing of that food.
 - There is no restriction for the use of the word “pure” for that particular food in the Regulations. (eg. pure honey)
- 6.4 Words such as “organic”, “biological”, ecological”, “biodynamic” or any words of the same significance *unless* the food conforms to the requirements specified in the *Malaysian Standards MS 1529: The Production, Processing, Labelling and Marketing of Plant-based Organically Produced Foods*.
- 6.5 Matters forbidden on label pertaining to nutrition or health claims are discussed in Section 8 of this article below.

❖ 7. Claims on Labels

- 7.1 No claims are to be made on the *absence* of beef or pork or its derivatives, or lard or added alcohol if the food does not contain such ingredients.
- 7.2 No claims to be made on the absence of any prohibited food additive or nutrient.
- 7.3 Any claims of absence or non-addition of a particular substance can be included in the label eg. No artificial colour, no artificial flavor, provided:

- Claims are not misleading
- The substance is not subjected to specific requirements in the Food regulation
- The substance is one which consumers would expect to find in the food
- The substance has not been substituted by another substance giving the food equivalent characteristics unless the substitution is clearly stated with equal prominence
- The presence or addition is permitted in food



7.4 Claims which highlight the absence or non-addition of one or more nutrients in or to food shall be regarded as nutrition claims and nutritional labeling is therefore applicable to those claims.

❖ 8. Other claims forbidden on any label relating to nutritional benefits of food

8.1 Except as otherwise provided in the Regulations, no label which describes any food shall include the word “compounded”, “medicated”, “tonic” or “health” or any other words of the same significance.

8.2 No label with the word “Nutritious” or any other words with same significance is allowed UNLESS the food fulfill ALL of the following:

- Contains a range of nutrients including carbohydrate, fat, protein, vitamin and mineral
- Contains energy of more than 40 kcal per 100g or 20 kcal per 100 ml
- Contains source of protein not less than 5g per 100 g or 2.5 g per 100 ml
- Contains at least four vitamins of an amount that meets the criteria for claim as source and two minerals (excluding sodium) of an amount that meets the criteria for claim as source
- The amount of nutrients mentioned above is declared

8.3 No claims stating that any given food will provide adequate source of all essential nutrients, except as otherwise permitted in the Regulations.

8.4 No claims implying that consuming a balanced diet or combination of variety of foods cannot supply adequate amounts of all nutrients.

8.5 No claims to be made which cannot be substantiated.

8.6 No claims as to the suitability of a food for the use in the prevention, alleviation, treatment or cure of a disease, disorder or particular physiological condition, except as otherwise permitted in the Regulations (see Section 12 of this article on nutrient function claims).

8.7 No claims which could give rise to doubt about the safety of a similar food or arouse or exploit fear in the consumer.



- ❖ 9. **Nutritional labeling** is a description intended to inform the consumer of nutrient content of food.



9.1 Foods requiring nutritional labeling are:

- Prepared cereal food
- A variety of breads (eg. White bread, Fruit bread, Milk bread, etc)
- Selected milk and milk products
- Flour confection
- Canned meat
- Canned meat with other food
- Canned fish
- Canned vegetable
- Canned fruit
- Canned fruit cocktail
- A variety of fruit juices
- Salad dressing
- Mayonnaise
- A variety of soft drinks including botanical beverage mix, soya bean drink

(Please refer to Regulation 18B (2) of the Food Regulations 1985 for the detailed listing of items under breads, milk & milk products, juices and soft drinks requiring nutritional labeling).

9.2 Any small food packages with total surface area of less than 100 cm² and returnable glass bottles do not need nutritional labeling provided no nutritional claims have been made.

9.3 Where *voluntary* nutritional labeling is made, this same set of nutritional labeling requirements is applicable to the products.

9.4 Nutritional information given is to be based on per 100g/ 100 ml/ or package if package contains single portion of food AND per serving of food.

9.5 Compulsory information is required for the following nutrients:

- Amount of energy in kcal or kJ, or both
- Amount of protein, available carbohydrate and fat expressed in g
- Amount of total sugars (monosaccharides and disaccharides) for ready to drink beverages
- Where a claim has been made of the amount or type of fatty acids, the amounts of saturated, monosaturated, polyunsaturated and trans fatty acid shall be declared in the table

Note: The conversion factors for calculation of energy and protein from nutrients and specific foods respectively are listed in Regulations 18B of the Food Regulations 1985.

9.6 Optional information on other nutrients may be provided:

9.6.1 Vitamins and minerals may be declared on the label provided they fulfill one of the following:

Nutrition Information		
	Per 100g	Serving of 40g + 125ml skimmed milk
Serving Size : 40g		
Servings per pack : 10		
Energy	1582 kJ	818 kJ
Protein	374 kcal	193 kcal
Carbohydrates	9.8 g	8.3 g
of which: Sugars	70.5 g	34.6 g
Fat	22.1 g	15.0 g
Cholesterol	5.8 g	4.2 g
Fiber	0.0 mg	7.0 mg
Sodium	7.7 g	3.1 g
	444.0 mg	246.0 mg

Vitamin and Mineral Content		
	Per 100g	Per 40g
Vitamin C	60.0 mg	25.3 mg
Thiamin (B1)	1.4 mg	0.6 mg
Riboflavin (B2)	1.6 mg	0.9 mg
Niacin	18.0 mg	7.3 mg
Vitamin B6	2.0 mg	0.9 mg
Folic Acid (Folacin B9)	200.0 µg	86.5 µg
Vitamin B12	1.0 µg	0.9 µg
Pantothenic Acid (B5)	6.0 mg	2.8 mg
Iron	14.0 mg	5.8 mg
Calcium	267.0 mg	266.0 mg

* Per serving values include nutrients contributed in milk.

- They are listed in the Nutrient Reference Values (NRV) (NRV is a list of vitamins and minerals proposed by Codex Alimentarius Commission)
- If the nutrients are not listed in NRV, they are present in not less than the amount in the reference quantity of the food as specified in Table II of Twelfth Schedule of the Food Regulations 1985 or
- A written approval from the Director has been given
- They are present in not less than 5 per cent of the Nutrient reference Values, supplied by a serving.
- Quantity shall be expressed metric units per 100 g or per 100 ml or per package if the package contains only a single portion And per serving as quantified on the label and may also be expressed as a percentage of Nutrient Reference Value (as given in Regulation 18B (11) of Food Regulations 1985.

9.6.2 Cholesterol, sodium may be declared on the label, the amount present expressed in *mg* per 100g or per 100 ml or per package if the package contains only a single portion and per serving as quantified on the label.

9.6.3 Dietary fibre may be declared on the label, the amount present expressed in *g* per 100g or per 100 ml or per package if the package contains only a single portion and per serving as quantified on the label.

9.7 Where a nutrition claim is made for a food, it is mandatory to include a nutritional labeling and the amount of any other nutrient for which a claim is made for that food.

❖ 10. Nutrient Content Claim

10.1 If a nutrient content claim (such as “free”, “very low”, “low”, “source” or “high”) is made for a food, the content for that nutrient shall meet the condition as specified in Table I and II to the Fifth A Schedule. (For eg. Food described as “low fat” shall not contain more than 3 g fat per 100 g food)



- Where the food is a naturally low in or free of a nutrient then the term describing the level of the nutrient shall not immediately precede the name of the food (eg. low fat baked beans is not allowed) but to be expressed with a statement “a low (naming the nutrient) food or “a (naming the nutrient)-free food”, eg. a low fat food

❖ **11. Nutrient comparative claim** is a claim that compares the nutrient levels or energy value of two or more foods

11.1 Words such as “reduced”, “less than”, “fewer”, “increased”, “more than”, “light” or “extra” or any other words of the same message may be used to compare the nutrient level in a food with the level in the reference food.

11.2 Comparative claims may only be used in the following situations:

- It is based on food sold, taking into account any preparation needed as according to the instructions given on the label
- The food being compared shall be different versions of the same or similar food
- A statement of the amount of difference in the energy value or nutrient content related to the same quantity shall be given and shall appear near to the nutrient comparative claim
 - To be expressed as a percentage, fraction or an absolute amount and full details of comparison to be given
 - The identity of the food shall be described such that it can be readily identified by consumers.

11.3 The comparison should be based on a relative difference of at least 25 per cent in the energy or nutrient value, except for micronutrients where a 10 per cent difference in the Nutrient reference Values (NRV) would be acceptable between the compared foods and a minimum absolute difference in the energy value or nutrient content equal to or more than the value required for claim as “low” or a “source” in Table I and II to the Fifth A Schedule.

❖ **12. Nutrient function claim** is a claim that describes the physiological role of the nutrient in the growth, development and normal functions of the body (eg. oat soluble fibre (β -glucan) helps lower or reduce cholesterol)

- 12.1 It shall not imply or include any statement claiming that the nutrient can cure, treat or protect the consumer from a disease.
- 12.2 The claim can only be included if the nutrient amount present is at least the amount of nutrient in the level to be considered as source of that nutrient per reference amount stated in Table II to Fifth A Schedule of the Food Regulations 1985.
- 12.3 Only 19 nutrients and their respective function claims can be made. They are as follows:
- 12.3.1 Folic acid
- Folic acid is essential for growth and division of cells
 - Folate plays a role in the formation of red blood cells
 - Folate helps to maintain the growth and development of the foetus
- 12.3.2 Salic acid
- Salic acid is an important component of the brain tissue
 - Claim may only be made in infant formula and follow-up formula
- 12.3.3 Iron
- Iron is a factor in red blood cell formation
 - Iron is a component of hemoglobin in red blood cell which carries oxygen to all parts of the body
- 12.3.4 Inulin and oligofructose (fructo-oligosaccharide):
- Inulin helps increase intestinal bifidobacteria and helps maintain a good intestinal environment
 - Oligofructose (fructo-oligosaccharide) helps increase intestinal bifidobacteria and helps maintain a good intestinal environment
 - Inulin is bifidogenic
 - Oligofructose (fructo-oligosaccharide) is bifidogenic
- 12.3.5 Iodine is essential for the formation of thyroid hormone
- 12.3.6 Calcium aids in the development of strong bones and teeth
- 12.3.7 Magnesium promotes calcium absorption and retention
- 12.3.8 Niacin is needed for the release of energy from proteins, fats and carbohydrates

12.3.9 Protein:

- Protein helps build and repair body tissues
- Protein is essential for growth and development
- Protein provides amino acids necessary for protein synthesis

12.3.10 Oat soluble fibre (β -glucan) helps lower or reduce cholesterol

12.3.11 Plant sterol or plant stanol helps lower or reduce cholesterol

- Where making such nutrient claim, the following statements are required on the label:
 - (i) "Not recommended for pregnant and lactating women, and young children under the age of five years"
 - (ii) "Persons on cholesterol-lowering medication must seek medical advice before consuming this product"
 - (iii) A statement to highlight that the product is consumed as part of a balanced and varied diet and shall include regular consumption of fruits and vegetables to help maintain the carotenoid level
 - (iv) "With added plant sterols" or "with added plant stanols" in not less than ten point lettering
- The total amount of plant sterol or plant stanol shall be expressed in metric units per 100g or per 100 ml or per package if the package contains only a single portion and per serving as quantified on the label
- the claim may only be made for milk, milk product, soya bean milk and soya bean drink

12.3.12 Vitamin A:

- Vitamin A aids in maintaining the health of the skin and mucous membrane
- Vitamin A is essential for the functioning of the eye

12.3.13 Vitamin B₁/thiamine is needed for the release of energy from carbohydrate

12.3.14 Vitamin B₂/riboflavin is needed for the release of energy from proteins, fats and carbohydrates

12.3.15 Vitamin B₁₂/Cyanocobalamin is needed for red blood cell production

12.3.16 Vitamin C:

- Vitamin C enhances the absorption of iron from non-meat sources

- Vitamin C contributes to the absorption of iron from food

12.3.17 Vitamin D:

- Vitamin D helps the body utilize calcium and phosphorus
- Vitamin D is necessary for the absorption and utilization of calcium and phosphorus

12.3.18 Vitamin E protects the fat in body tissues from oxidation

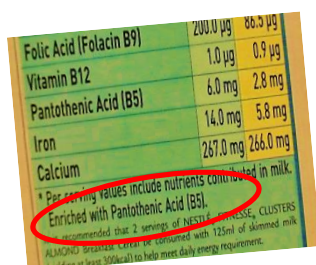
12.3.19 Zinc is essential for growth

❖ 13. Food with Added Nutrients

13.1 Added nutrients include any mineral, vitamin, amino acid, fatty acid, nucleotide or other food components (as specified in Table I to Twelfth Schedule of Food regulations 1985) which when added singly or in combination to food, improves the nutritional value of food.

13.2 Every package containing food with “added nutrient” shall be labeled the name and amount of the added nutrient.

13.3 Claims such as “enriched, fortified, vitaminised, supplemented or strengthened” or any statement with similar meaning is allowed to be declared for the following foods provided they contain the amount of the vitamin or mineral as the case may be, not less than that specified in Table II to Twelfth Schedule of Food Regulations 1985. The following foods are included in the Twelfth Schedule:



Folic Acid (Folacin B9)	200.0 µg	86.0 µg
Vitamin B12	1.0 µg	0.9 µg
Pantothenic Acid (B5)	6.0 mg	2.8 mg
Iron	14.0 mg	5.8 mg
Calcium	267.0 mg	266.0 mg

* Per serving values include nutrients contributed in milk.
Enriched with Pantothenic Acid (B5).
Recommended that 2 servings of NESTLE'S ALMOND BREAD CRISPS be consumed with 125ml of skimmed milk (and/or at least 300ml) to help meet daily energy requirement.

- Bread
- Breakfast cereal
- Condensed milk-sweetened and unsweetened; filled milk and condensed filled milk- sweetened and unsweetened;
- Dried milk powder (full cream or skimmed)
- Extract of meat, vegetable, or yeast
- Flour (wheat)
- Malted milk powder
- Other solid food not specified above excluding canned food for infants and young children and cereal based food for infants and young children
- Liquid food including vegetable juice, and fruit juices

13.4 Food to which amino acid or fatty acid or both has been added may bear a claim that the food is enriched or supplemented with amino acid or fatty acid or both and shall be expressed on the label in the following form:

“This food is (enriched, fortified, or vitaminised, etc) with (state amount in mg) of (state whether amino acid, fatty acid or both)”

13.5 Where a claim is made that the food contains bifido bacteria:

- The viable bifido bacteria count present in that quantity of the food is to be declared.
- The label shall bear the words “CONTAINS VIABLE BACTERIA, REQUIRE SPECIAL STORAGE CONDITION” or “CONTAINS VIABLE BACTERIA, FOLLOW INSTRUCTION FOR STORAGE”

❖ 14. Recipe or Serving suggestions



14.1 Pictorial representation or design may be included in the label for:

- illustrating recipes involving the use of the food
- suggestions on how to serve food

14.2 The words “RECIPE” or “SERVING SUGGESTION” or other words with similar meaning comes after or is nearby the pictorial representation or design

❖ 15. Other Important Information on Label

Where any food is added with polydextrose, the label on a package containing such food shall have the words “Sensitive individuals may experience a laxative effect from excessive consumption of food containing polydextrose”.

❖ 16. Particular labeling requirement

In addition to the general labeling requirements, some foods have additional labeling requirements specified for that particular food. Foods with particular labeling requirements are:

- Confection (flour confection, sugar confection, frozen confection, ice confection or table confection)
- Egg
- Edible fat and edible oil
- Fruit juice
- Meat and meat product
- Milk and milk product
- Soft drink
- Spirit (Alcoholic beverage)
- Tea
- Vinegar
- Food containing bifido bacteria

❖ **17. Exemptions of Food from labeling**

- 17.1 Food that is weighed, counted or measured and packed on the retail premises in the presence of purchaser (and is of the nature, quality, quantity, origin or brand requested by the purchaser) is exempted from the labeling requirements.
- 17.2 Perishable cooked food ready for consumption which is packed on retail premises as requested by the purchaser (Eg. purchased from retail premises, hawkers, take aways, day or night market) is also exempted from labeling requirements

References:

1. Food Act 1983 (Act 281) & Regulations (As at 1st March 2013). International Law Book Services. 43-332, 425-438.