

REPORT ON FINDINGS FROM THE PUBLIC CONSULTATION ON POSSIBLE MEASURES FOR PRE-PACKAGED SUGAR-SWEETENED BEVERAGES

1. As part of the War on Diabetes, the Ministry of Health (MOH) and Health Promotion Board (HPB) have been looking into reducing Singaporeans’ sugar intake. HPB’s latest survey in 2018 showed that on average, Singaporeans consumed twelve teaspoons (or 60g) of sugar daily. More than half of this came from sugar-sweetened beverages (SSBs), of which 64 per cent were pre-packaged SSBs¹. This is a concern as drinking an additional 250 ml serving of SSB every day increases the risk of diabetes by up to 26%². In addition, the average sugar level of medium- to higher-sugar SSBs has not declined over the past 10 years, and remains high at 5 teaspoons (per 250 ml serving).

2. To this end, MOH and HPB held a public consultation from 4 December 2018 to 25 January 2019 to seek views from the public and key stakeholders on four possible measures to reduce Singaporeans’ sugar intake from pre-packaged SSBs (See [Table 1](#)).

Table 1: Possible measures and formats under the public consultation.

<p>1. Mandatory Front-of-Pack Nutrition Label</p> <p><i>to help consumers identify less healthy SSBs and make informed choices</i></p>	<p>2. Advertising Regulations for Less Healthy SSBs</p> <p><i>to reduce the influence of advertising on consumer preferences</i></p>	<p>3. Excise Duty on Manufacturers and Importers of SSBs</p> <p><i>to encourage the industry to reformulate and reduce the sugar content of their drinks</i></p>	<p>4. Nationwide Ban on Higher-Sugar SSBs</p> <p><i>to discourage consumption of such SSBs</i></p>
<p>Possible label types:</p> <p>Non-interpretive:</p> <ul style="list-style-type: none"> Nutrient-specific label  <p>Interpretive:</p> <ul style="list-style-type: none"> Nutrient-summary label Warning labels 	<p>Possible formats:</p> <ul style="list-style-type: none"> Make current restrictions mandatory and expand them to include <u>more</u> TV time-belts and media channels which children are exposed to Impose a ban across <u>all</u> TV time-belts and mass media channels 	<p>Possible formats:</p> <ul style="list-style-type: none"> Flat duty – same duty rate for all SSBs with sugar levels beyond a certain threshold Tiered duty – more than one duty rate, with a lower duty rate for SSBs with lower sugar level 	<p>N.A.</p>

¹ National Nutrition Survey 2018. Singapore: Health Promotion Board.

² Neelakantan N and van Dam RM (2017) Sugar-sweetened beverages in relation to weight gain and risk of type 2 diabetes and cardiovascular diseases: a review of meta-analyses and original research articles on Asian populations.

CONSULTATION APPROACH

3. The Government consulted a wide range of stakeholders including members of the public, health professionals, and academia. Major segments of the SSB and advertising industries were also consulted, including manufacturers, importers, distributors and retailers, media owners across broadcast, print, outdoor and digital platforms, as well as the relevant trade associations and chambers of commerce.

4. In total, over 4,000 responses were received through the following channels:

- a) **Online consultation via the Government's feedback unit REACH:** We received a total of 2,810 responses online.
- b) **Listening Points on the ground:** We held three Listening Points³ in the community to reach out to various segments of the population who might not have participated in the online consultation. A total of 919 members of the public provided their feedback via the Listening Points.
- c) **Face-to-face dialogue sessions:** We held a total of fifteen face-to-face dialogue sessions⁴. 173 members of public, and industry representatives from 56 organisations participated in the sessions (see [Appendix 1](#)).
- d) **Email responses:** We received a total of 124 email responses, comprising 101 from members of the public and 23 from industry representatives, consumer groups and expert organisations (see [Appendix 1](#)).

SUMMARY OF RESPONSES

5. 89 percent of respondents⁵ were in favour of the Government doing more to reduce Singaporeans' sugar intake from SSBs, citing the negative impact of excessive sugar intake on health. The remaining respondents felt that current efforts were sufficient.

6. **84 percent supported mandatory front-of-pack labels** as they felt that it could help consumers make informed choices about what to consume. This was followed by **71 percent who supported advertising regulations** as these could reduce the influence of advertisements on purchase and consumption decisions, especially among young consumers. **65 percent supported an excise duty** to encourage manufacturers to reduce the sugar content in their drinks, while **48 percent supported a ban** on the sale of higher-sugar SSBs as it could remove access to such SSBs. Those who were not in favour of the duty and the ban expressed concerns about the potential increased costs and deprivation of consumer choice respectively.

³ Held at ITE College East, Bedok Town Square and Geylang Serai Market to engage youths and seniors more actively in the policy development process.

⁴ Comprising 2 sessions with members of the public, 12 sessions with industry stakeholders, and 1 session with public, industry, health professionals and academia.

⁵ Out of 3729 responses received via REACH portal and on-ground listening points

7. The industry preferred the Government to continue with the current voluntary approach instead of introducing regulatory measures. In particular, they expressed particularly strong views against the duty and the ban, as they felt that these measures would be ineffective in reducing sugar intake and adversely affect businesses. Some industry representatives indicated that should the Government decide to introduce regulatory measures, they would be more supportive of the front-of-pack label compared to the other measures, as providing consumers with information was a responsible industry practice. Most also opined that the label should provide information in a factual and objective manner. On the proposed advertising regulations, industry representatives highlighted that any regulations should be applied consistently across all mass media channels, citing the shift in media consumption pattern from traditional media to new media platforms.

8. The four expert organisations that responded to the public consultation were all supportive of the proposed measures. In terms of the format of the measures, they were aligned in their preference for interpretive labels, comprehensive advertising regulations, and a tiered duty. They also provided suggestions on the designs of the respective measures, including mandating the front-of-pack label for all SSBs, and not only less healthy SSBs; and tying the advertising regulations with the label.

9. Beyond the four measures in the public consultation, some respondents also suggested that the Government could further strengthen educational efforts on the importance of curbing sugar intake from a young age, as well as look into regulating other sources of Singaporeans' sugar intake, such as freshly prepared drinks and sugary foods. With the increasing popularity of freshly prepared beverages such as bubble teas, there were concerns that sugar intake from these drinks would increase, and consumers might simply substitute one source of sugar for the other.

MANDATORY FRONT-OF-PACK NUTRITION LABEL

10. Public's Views. 84 percent of respondents supported the introduction of a mandatory front-of-pack label. They felt that the label would provide consumers with easily understandable and accessible information about how healthy a product was, and facilitate informed purchase and consumption decisions. The remaining respondents thought that certain label formats could be difficult to understand and lose their utility, unless there were accompanying educational efforts on how to interpret them.

11. In terms of the format of the label, respondents who supported a mandatory front-of-pack labelling scheme preferred interpretive labels (i.e. nutrient-summary and warning labels) that provided clear information on the healthiness of the product, over non-interpretive labels (i.e. nutrient-specific labels) that only provided nutrition information⁶. Respondents generally felt that interpretive labels would be easier to understand and better facilitate purchase and consumption decisions.

⁶ Among those who supported mandatory front-of-pack labels, 71% of online respondents and 80% of face-to-face dialogue participants preferred interpretive labels.

12. Among those who preferred interpretive labels, there was a preference for warning labels among online respondents, and for nutrient-summary labels among face-to-face dialogue participants⁷. Those who preferred a warning label thought that it clearly marked out less healthy options and could have a deterrent effect on consumers. However, some respondents commented that the warning label provided insufficient information and consumers might also become de-sensitised to it over time. Those who preferred a nutrient-summary label expressed that it provided more information than a warning label (i.e. it provides information on how healthy it is on a spectrum of healthier to less healthy) while still being simple enough to understand.

13. As for a nutrient-specific label, a small proportion of respondents expressed that a nutrient-specific label would provide detailed information for consumers to make their own decisions. However, the general sentiment was that it requires some level of nutritional knowledge to interpret, and certain population segments such as children and seniors might have difficulties understanding it.

“I think the summary label is in-between, to make it easy for the older people and also for those who are health fanatics”

- Public respondent

“Warning labels are not very useful since many are already aware. Nutrient-specific labels might not be easily understood by some members of the public e.g. the elderly, so nutrient-summary labels are most effective because it communicates information simply and easily.”

- Public respondent

14. Industry’s Views. Overall, industry preferred to retain the current Healthier Choice Symbol (HCS), which in their view was sufficient to encourage consumers to make healthier choices. However, if a new label were to be introduced, the majority of industry respondents preferred a nutrient-specific label, expressing that it would provide consumers with the most comprehensive and factual information. Some industry representatives also suggested that the front-of-pack label should be introduced together with a back-of-pack Nutrition Information Panel containing detailed information on nutrients, and be supported by educational efforts to help consumers understand the new label. There were also industry representatives who proposed that the label should be applied to all pre-packaged food and beverage products, not just pre-packaged SSBs, to level the playing field.

ADVERTISING REGULATIONS

15. Public’s Views. 71 percent of respondents supported the introduction of regulations to restrict advertisements of less healthy SSBs. They felt that this could help to reduce the influence of advertisements on consumers’ purchase and consumption decisions, especially among children and youth. Some respondents also expressed that there should also be regulations against misleading advertising, where SSBs were depicted as having positive health benefits.

⁷ Among those who preferred interpretive labels, 65% of online respondents preferred a warning label; 64% of face-to-face dialogue participants preferred a nutrient-summary label.

16. Respondents who did not support advertising regulations felt that advertisements might not influence consumption decisions for those with entrenched preferences. Some also expressed that the regulations would have limited impact unless they were enforced across all media platforms, including digital media.

17. In terms of the format of the regulations, respondents preferred a complete ban on mass media advertisements of less healthy SSBs, to an expansion⁸ of the current advertising guidelines⁹. Those who preferred a complete ban felt that it was important for the regulations to be comprehensive and cover digital platforms such as social media. Some thought that a ban would be easier to enforce, and added that there was no reason why less healthy SSBs should be promoted at all. Respondents who preferred an expansion of existing guidelines commented that a ban might be too harsh on businesses. They suggested a phased approach by starting with an expansion before considering a ban in the future, if necessary.

“A ban would be more sensible and effective as children view channels and time-belts that do not specifically target them, and could be exposed to advertisements for SSBs via social media.”

- Public respondent

“We cannot just focus on children. We also need to ensure [that] our efforts are targeted at older children and adults who can pass the message to the children.”

- Public respondent

18. Industry’s Views. The SSB industry recognised the importance of responsible advertising to children. However, they were of the view that the current self-regulatory framework administered by the Advertising Standards Authority of Singapore (ASAS) has worked well. They supported the strengthening of these current ASAS guidelines to cover more television time-belts and media channels that children are exposed to. Some also argued that a self-regulatory framework is more dynamic and gives businesses greater flexibility in adapting quickly to market changes. In addition, some media industry representatives expressed that any new regulations should be enforced consistently across both traditional (e.g. television, newspapers) and new media (e.g. social media) to ensure a level playing field. There were also industry representatives who called for the Government to strengthen positive public education campaigns instead of regulating the advertising of less healthy products.

EXCISE DUTY

19. Public’s Views. 65 percent of respondents who agreed that the Government should do more to reduce sugar intake from SSBs supported the introduction of an excise duty on manufacturers and importers of pre-packaged SSBs, as they felt that the duty could encourage the industry to reduce sugar content in their drinks, and offer a wider variety of lower sugar options to consumers.

⁸ Among those who supported advertising regulations, 56% of online respondents and 51% of face-to-face dialogue respondents preferred a complete ban on mass media advertisements to an expansion of the current guidelines.

⁹ Under the Children’s Code for Advertising Food and Beverage Products, all food and beverage products promoted in marketing communications targeted at children aged 12 and below must meet the Common Nutrition Criteria. The guideline applies to all media platforms.

“It will encourage manufacturers to lower the sugar content in their drinks, and consumers will still get to enjoy their favourite drinks but with a lower sugar level.”

- Public respondent

20. Respondents who did not support an excise duty cited potential higher costs as a key concern. They felt that manufacturers would pass the increase in cost to consumers and increase the price of even non-dutiable SSBs. Some were also concerned that the increase in prices could be disproportionately higher than the actual amount of duty levied. In addition, some viewed the duty as a strong-handed, revenue-generating measure that reduces consumer benefit.

21. In terms of format, 85 percent of online respondents who supported an excise duty preferred a tiered duty to a flat duty, as they felt that it was fairer to impose a higher duty rate on SSBs with higher sugar content. It would also provide greater incentive for manufacturers to reduce the sugar content of drinks and allow consumers to adjust their palates gradually. Respondents who preferred a flat duty expressed that it would be easier to implement.

“The tax is going to be passed on to the consumer. As it is, cost of living is already so high - we can do without another item being taxed.”

- Public respondent

“At the end of the day, the increase in excise duty will mean that manufacturers will increase the price and may even take this chance to increase the price of their list of products. It will be consumers that suffer in the end.”

- Public respondent

22. Industry’s Views. The industry disagreed with the introduction of an excise duty, expressing that there was limited evidence to show that it was effective in improving population-level health outcomes. Some representatives also said that a duty imposed solely on pre-packaged SSBs would create an uneven playing field as consumers could substitute pre-packaged SSBs with other sugary food and drinks. Some also indicated that a duty would increase business costs, which they would likely pass on to consumers.

“We are concerned that [the duty] will pose a tremendous burden on each company involved in the beverage industry. It will also increase the burden on consumers as each company will pass the cost of the excise duty to the final product prices.”

- Industry respondent

NATIONWIDE BAN ON SALE OF HIGHER-SUGAR PRE-PACKAGED SSBs

23. Public’s Views. 48 percent of respondents who supported the Government doing more to reduce sugar intake from SSBs supported a nationwide ban on sale of higher-sugar pre-packaged SSBs. They expressed that removing access would be the most effective way to curb consumption. Some also thought that this could spur manufacturers to reformulate their products. Respondents who did not support the ban felt that it was too extreme and deprived consumers of their ability to choose. They felt that consumers could substitute pre-packaged SSBs with other sugary options, or purchase the banned SSBs from other countries. Some respondents also suggested a ban in selected settings (such as hospitals and schools) instead of a nationwide ban.

24. **Industry's Views.** The industry disagreed with the introduction of a ban. Many shared that it would not be effective in reducing overall sugar consumption as consumers could easily substitute banned SSBs with alternative sources of sugar, such as freshly prepared beverages. Some also expressed that it would be a disproportionate response, and indicated that they would not be supportive if the threshold is more stringent than the current 12 per cent sugar level pledge¹⁰ by the seven key SSB manufacturers.

OTHER SUGGESTIONS

25. Members of the public and industry representatives also gave other suggestions to reduce Singaporeans' sugar intake, as follows:

- a. **Further strengthening educational efforts** on the sources of sugar in our diet and harmful effects of high sugar intake. The public and industry representatives acknowledged that the Government had rolled out many public education initiatives and healthy-eating campaigns. However, they thought that more could be done as awareness levels were still low, in their view.
- b. **Tackling other sources of sugar**, including freshly-prepared SSBs and sugary foods, as they formed a sizable proportion of Singaporeans' sugar intake. For example, both the public and the industry expressed concern over high sugar levels in popular beverages such as bubble teas and blended coffee drinks. They acknowledged that consumers usually had a choice over the sugar level in these drinks, and that the Government had been actively encouraging consumers to opt for lower-sugar options. However they suggested that more could be done to raise awareness, and reduce sugar intake and prevent substitution to these sources.
- c. **Increasing the availability of water.** Members of the public welcomed the installation of water dispensers at several hawker centres in recent months, and suggested that this move could be extended to more public locations. Some also cited practices from other countries where restaurants provided drinking water at no cost, and called for local F&B establishments to do the same.
- d. **Subsidising healthier foods and drinks** so that they were cheaper than less healthy options. Some members of the public called for the Government to adopt a "soft" approach of subsidising and incentivising manufacturers to reduce sugar in their products and consumers to reduce sugar intake, rather than a "hard" approach of a duty and/or ban.

THANK YOU

26. MOH and HPB would like to thank all stakeholders and members of the public who took the time to respond to this consultation and participate in the discussions. Your feedback has been and will continue to be taken into careful consideration as we assess additional measures to reduce sugar consumption in Singapore.

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¹⁰ In September 2017, 7 major SSB manufacturers, who make up 70% of the pre-packaged SSB market in Singapore, pledged to limit the sugar content of their drinks sold in Singapore to no more than 12% by 2020.

APPENDIX 1

ORGANISATIONS THAT PARTICIPATED IN THE PUBLIC CONSULTATION

1. Industry representatives who attended the dialogue sessions

Pre-packaged SSB and food industry

Associations	Manufacturers	Importers/ Distributors	Retailers
<ul style="list-style-type: none"> • Association of Small and Medium Enterprises • Food & Beverage Management Association • Food Industry Asia • Restaurant Association of Singapore • Singapore Business Federation • Singapore Foo Chow Coffee Restaurant & Bar Merchants Association • Singapore Food Manufacturers' Association • Singapore Chinese Chamber of Commerce & Industry • Singapore Indian Chamber of Commerce & Industry • Singapore International Chamber of Commerce • Singapore Manufacturing Federation • Singapore Minimart Association • Singapore Retailers' Association 	<ul style="list-style-type: none"> • Coca-Cola • Coffeehock • Faesol • F&N • Kerry • Kim Hing Food Industries • Malaysia Dairy Industries • Nestle • PepsiCo • Pokka • Seah's Spices Food Industries • Suntory • Tai Hua Food Industries • Yakult • Yeo Hiap Seng 	<ul style="list-style-type: none"> • Etika • Field Catering • Fresh N Natural Foods • Hock Leong Teck Kee • Radha Exports • Shin Tai Ho & Co 	<ul style="list-style-type: none"> • Dairy Farm • NTUC • Prime • RedMart • Sheng Siong • U Stars • 7-eleven
13 associations	15 companies	6 companies	7 companies
Total: 41 organisations			

Advertising Industry

Associations	Media Owners	
<ul style="list-style-type: none"> • Association of Accredited Advertising Agents • Association of Media Owners of Singapore • Advertising Standards Authority of Singapore • Institute of Advertising Singapore • Singapore Advertisers' Association 	<p><u>Print, Broadcast</u></p> <ul style="list-style-type: none"> • Mediacorp • Singapore Press Holdings • Starhub • Singtel <p><u>Digital</u></p> <ul style="list-style-type: none"> • Facebook 	<p><u>Out of Home</u></p> <ul style="list-style-type: none"> • Cornerstone Financial holdings (formerly Focus Media) • JCDecaux <p><u>Cinema</u></p> <ul style="list-style-type: none"> • Golden Village <p><u>Transportation network</u></p> <ul style="list-style-type: none"> • Moove Media • X Collective, subsidiary of SMRT Experience
5 associations	10 companies	
Total: 15 organisations		

2. Organisations that submitted written responses to the Public Consultation paper

	Type	Name of the organisation
1	SSB manufacturer	Allswell
2		Coca-Cola
3		F&N
4		Nestle
5		PepsiCo
6		Yakult
7		Kerry Taste & Nutrition
8	SSB distributor	Etika
9	F&B association	Food Industry Asia (FIA)
10		International Council of Beverage Associations (ICBA)
11		Singapore Manufacturing Federation (SMF)
12	Media owner	Singtel
13		Starhub
14	Advertising association	Singapore Advertisers' Association (SAA)
15		WPP
16	Chamber of Commerce	Japanese Chamber of Commerce & Industry, Singapore (JCCI)
17		Singapore International Chamber of Commerce (SICC)
18	Consumer group	Joint response from the Australian Taxpayers' Alliance (ATA), MyChoice Australia (MC), and the Taxpayers Protection Alliance (TPA)
19	Union	Healthcare Services Employees' Union (HSEU)
20	Expert organisation	Public Health England
21		Saw Swee Hock School of Public Health
22		University of North Carolina
23		World Health Organization