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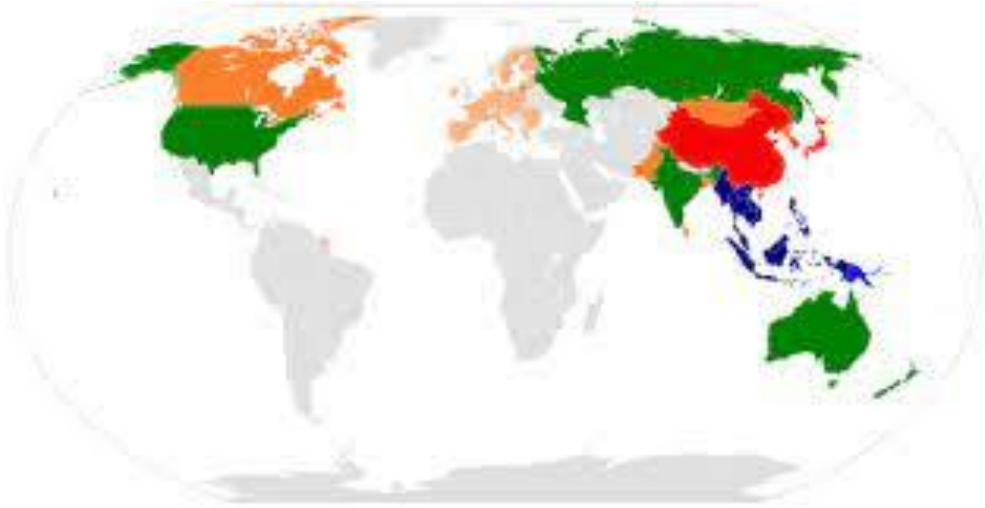
111 年度保健營養食品產業鏈優化及品質提升計畫

越南保健營養食品法規現況、市場需求及其外銷策略研析



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目錄

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壹、前言

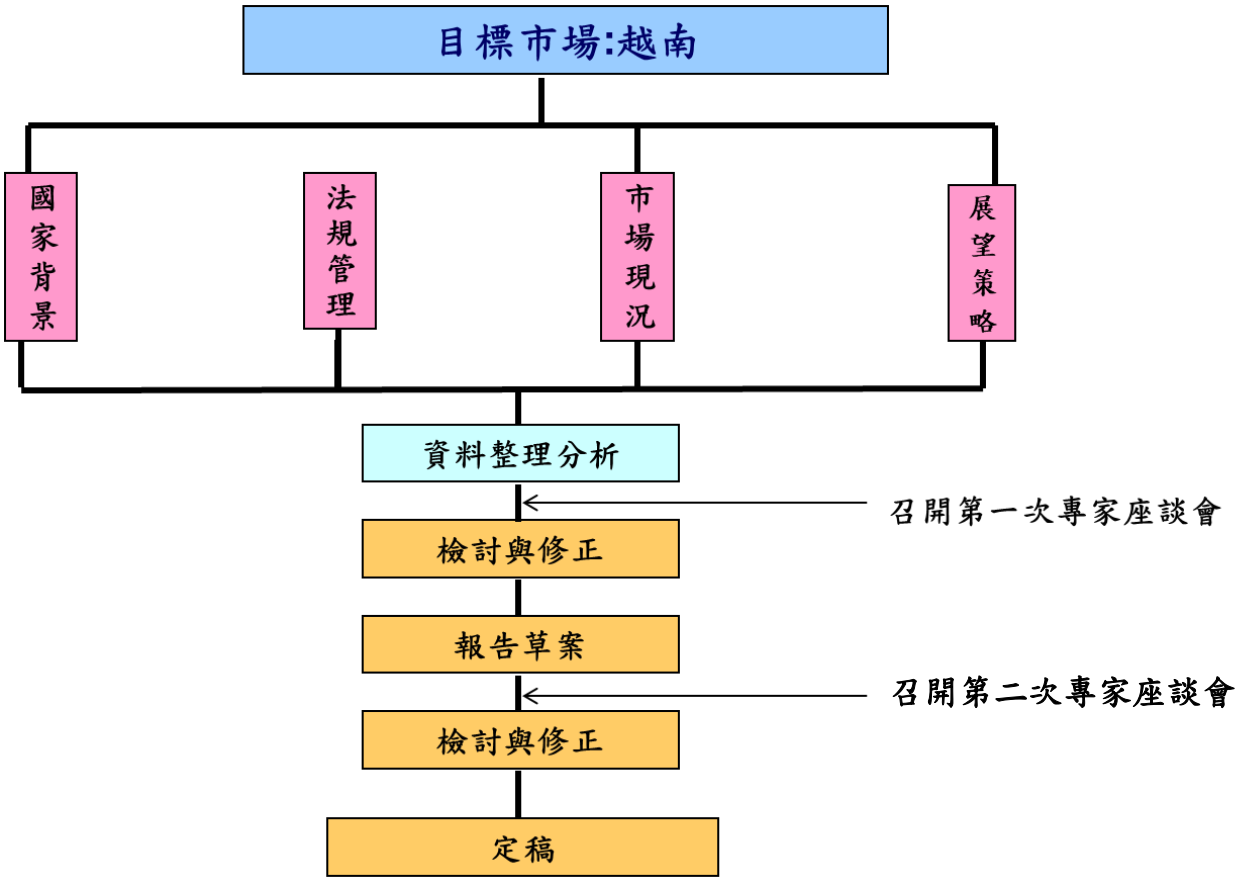
國內保健營養食品市場屬淺盤型市場，欲提升國內保健營養食品產業整體產值勢必要從拓展外銷著手，開發國外市場。長遠來看，除了將國外保健食品目標市場持續鎖定在具有蓬勃商機的先進國家以外，應留意全球其他經濟快速成長之新興市場。

據穀研所歷年進行國內保健營養食品產業現況調查結果指出，目前國內保健營養食品業者拓展的外銷目標市場為中國大陸及東南亞各國，初步鎖定經濟發展狀況較好的東協五國進行拓展，包括印尼、泰國、菲律賓、馬來西亞及越南，再者東南亞將躍升為全球第 4 大經濟體，看好其未來經濟發展潛力及當地對保健營養食品之需求。近來年因經濟表現況亮眼，越南有「東南亞新小虎」之美譽，2018 年的經濟成長率高達 7.1%，創下自 2008 年以來的新高，主要原因為宏觀總體的經濟情勢穩定，私人消費穩定成長，經濟結構逐漸轉型與升級。且自 2000 年以來，越南保健營養食品市場已有近 19 年發展歷史，在保健營養食品相關法規管理制度也日益完善，而市場亦持續蓬勃發展中，因此，2020 年度以越南為標的，從當地衛生主管機關官方網站、市場資料庫、國內外期刊文獻等，客觀蒐集目標市場法規及市場面資料，如健康宣稱管理、產品標示管理、申請保健營養食品註冊需具備之資料等資料，並將其彙整分析，作為有意拓展越南保健營養食品市場之業者參考。

貳、研究目的

進行外銷目標市場現況如保健營養食品法規管理制度、市場發展現況、產品消費趨勢等資料蒐集並進行彙整分析，以提供業者作為未來開拓外銷市場之參考，以期減少他們在法規及市場資料摸索的時間，縮短外銷拓展之時效。

參、研究架構



肆、全球保健營養食品發展概況

依據知名市調公司-Technavio 公司調查結果指出，2017 年全球保健營養食品市場(含機能性食品及機能性飲料市場)之市場規模已達 4,814 億美元且每年以 7%以上的成長率穩定的成長，預期未來也將持續成長，新穎性機能性素材之應用開發及消費者對機能性食品之需求增加驅動此發展趨勢。目前以美國在內的美洲區域為最大的保健營養食品消費市場，預估在 2021 年，市場規模可望達到 6512 億美元，而市場版圖將改變，包含中國及東協各國在內的亞太平洋區將取代先進國家歐美市場，將躍升為最大的保健營養食品消費市場(詳如**圖** 1、2)。

消費者對機能性食品之需求增加主要受到人口老化、消費者健康意識抬頭及父母關心子女健康等因素影響，然而，日趨嚴格的政府法規將成為該市場成長主要抑制因子，這也使得保健

營養食品市場成為日益受到監管的市場，所有產品在行銷上只能有精確且據科學驗證的健康宣稱。

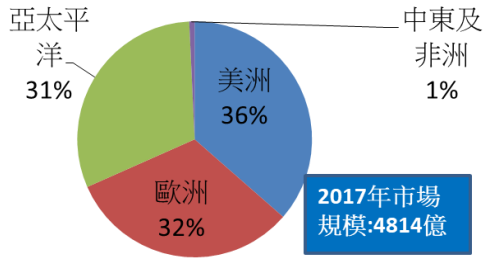


圖 1、2017 年全球機能性食品及機能性飲料市場份額分佈

資料來源:Technavio 公司

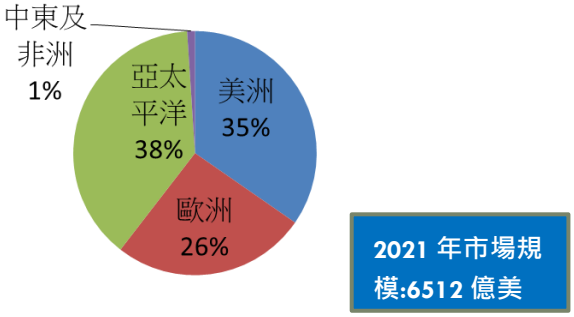
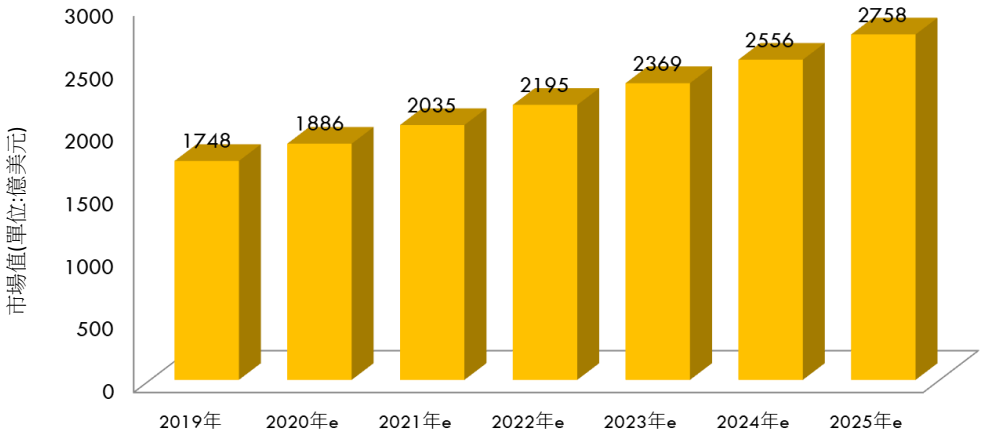


圖 2、2021 年全球機能性食品及機能性飲料份額分佈(預估)

資料來源:Technavio 公司

若單就全球機能性食品市場規模來看，Statista 市調公司推估 2019 年約達 1748 億美元(詳如**圖 3**)，2025 年可望達到 2758 億美元，係因中國及東南亞等新興國家，因經濟成長、健康觀念的攀升，驅動成長動能，致使一般食品朝向保健化方向發展，使得機能性食品市場大有可為。



資料來源:Technavio 公司

圖 3、全球機能性食品市場規模推移

伍、越南國家背景介紹

一、 地理、氣候及行政區劃分

越南位於中南半島東部，地理坐標為北緯 8°10'～23°24'、東經 102°09'～109°30'之間，北與中國大陸(廣東、廣西、雲南)接壤，西與寮國、柬埔寨交界，東面和南面臨南海，與馬來西亞隔海相

望。海岸線長 3260 多公里。南北長 1600 公里，東西最窄處為 50 公里。

越南全國大約 331,688 平方公里。地形包括有丘陵和茂密的森林，平地面積不超過 20%。山地面積佔 40%，丘陵佔 40%，森林佔 42%。北部地區由高原和紅河三角洲組成。東部分割成沿海低地、長山山脈及高地，以及湄公河三角洲。

北越有春夏秋冬；南越僅雨、旱兩季，5~10 月為雨季；11~4 月為乾季，氣溫約 20℃~33℃，10 月日短夜長；4 月夜短日長，12 月最冷。北部四季分明，每年十一月至次年三月為明顯冬季，與屏東、高雄相似，七月至十月間時有颱風及水災。

越南現行區劃分為省、縣、社三級。一級行政區分為 58 個省和 5 個直轄市分別為河內市(首都)、胡志明市、峴港市、海防市及芹苴市，直轄市直屬中央。越南通常把省份分為 8 個地區，分別為西北、東北、紅河三角洲、中北部、中南部、西原、東南部，和湄公河三角洲。這些地區劃分並非經常採用，而且亦可作其他方式的劃分。

二、 人口結構

據越南統計總局指出，2019 年越南人口數約達 9648 萬人，在東南亞地區人口數排名第 3 位，城市人口占總人口的 34.4%，農村人口占總人口的 65.6%。2020 年將達 9753 萬人以上，佔全世界人口約 1.25%。越南也是世界上人口密度較高的國家，人口密度約 314 人/平方公里(314 per Km^2)，首都河內和第一大城市胡志明市的人口密度分別為每平方公里 2,398 人(2,398 per Km^2)和 4363 人(4,363 per Km^2)，第一大城市胡志明市人口數居全國之冠，約為 8,598,700 人(佔越南總人口數約 9.01%)，而河內人口數約為 7,520,700 人，居次(佔越南總人口數約 7.88%)(詳如**表 1**)，從人口數之分佈來看，越人口普遍集中在胡志明市、河內、海防、芹苴及峴港 5 大直轄市，國內外保健營養食品相關業者初步先鎖定胡志明市及河內作為市場佈局之主力市場。越南年齡中位數為 32.5 歲，因此，主要消費年齡層普遍較為年輕化，雖然目前有 2/3 的

人口年齡在 35 歲以下，唯人口增長速率下降，預估 2030 年，越南人口中位數將來到 40 歲。此外，越南有 54 個民族，京族占總人口 87%，少數民族占 13%。華裔人口約占總人口的 1%左右。越南各民族的語言屬於不同的 8 組語言。

85 至 90%的越南人以越南語為母語，與在中國廣西的京族語言相通。歷史上，越南語曾經使用漢字與喃字表記(即漢喃文)，現代則使用以拉丁字母添加若干個新字母及聲調符號的拼音書寫。

表 1、越南人口數排名前 10 名之城市

排名	城市	人口數	佔越南全國總人口數佔比	面積(km²)	省份	區域
1	胡志明市	8,598,700	9.01%	2,095.5	中央直轄市	東南部
2	河內市	7,520,700	7.88%	7,914.9	中央直轄市	紅河三角洲
3	海防市	2,013,800	2.11%	1,527.4	中央直轄市	紅河三角洲
4	芹苴市	1,569,301	1.65%	1,409.0	中央直轄市	湄公河三角洲
5	峴港市	1,080,700	1.13%	1,285.4	中央直轄市	南中部
6	邊和市	784,398	0.82%	5,907.2	同奈省	東南部
7	順安市	603,000	0.63%	5,033.2	平陽省	東南部
8	海陽市	507,469	0.53%	1,656.0	海陽省	紅河三角洲
9	以安市	480,413	0.50%	2,694.4	平陽省	東南部
10	清化市	393,294	0.41%	11,130.2	清化省	北中部

資料來源:越南統計局(general statistics office of Vietnam)(2018);穀研所彙整

三、飲食文化

南北越氣候不同，北越四季分明，南越一年到頭都很炎熱，一個國家，衍生兩個不同的飲食文化，南越口味較重，口味偏酸及甜，而北越偏鹹，整體普遍而言，都不喜歡苦味的口感。

越南料理通常可以分為三個菜系。越南北部是越南文化的主要發源地，很多著名的菜餚（如越式河粉和越南粉卷）都源自北部地區。越南北部的菜餚更傳統並在對調料和原料的選擇上更嚴格。

越南南部菜餚在歷史上受到中國南方移民和法國殖民者的影響。越南南方人喜歡帶甜味的菜餚，且比起其他地區而言使用更多種類的香草。

越南中部的飲食與南部和北部的相比差異明顯，越南中部料理使用更多的小配菜，也更具辣味。

保健營養食品業者在進行產品開發時需特別留意越南各地消費者對於口味上的喜好程度，若鎖定在河內作為目標市場，則河內位於北越，若為鹹味之產品在口感設計上不宜呈現偏甜或酸的口感，若是採用具苦味之中藥、草本素材為原料製作保健營養食品，則要留意苦味不宜過重，需以甜味劑加以調和，才能提高產品在越南的接受度。

四、越南經濟表現

依據世界銀行資料指出(如**表 2**)，2019 年總體國內生產總值(GDP)達 0.2619 兆美元。據越南統計總局指出越南 2019 年實際國內生產總值（GDP）增長率為 7.02%，高於作為政府當初設定之目標 6.6～6.8%，連續 2 年超過 7%，經濟表現成長亮眼，由於中美貿易戰的影響，來自中國的生產轉移正在加速，越南對美出口同比增長 28%，零售等內需也保持強勁，推高了增長率。越南人均 GDP 約 8041 美金，相當於年收入約 24 萬台幣，月薪約 1.2 萬台幣，再者，由於越南低失業率，GDP 成長顯著帶動企業調薪，使得所人民所得增加，加速中產階級的崛起，目前越南中產階級約達 700 萬人口，使得越南消費市場節節攀升，前景看好。

越南憑藉本身充沛勞動力與豐富天然資源(石油、天然氣與煤)，加上政治穩定，吸引外人投資。越南自改革開放，走上市場經濟導向之後，經濟結構中之農業產值占 GDP 比率逐年減少，轉為以服務業與工業為主，2019 年服務業、工業及農業占 GDP 比重分別為 42.4%、36.9%及 11.8%。越南勞動力人口約有 5,480 萬人，受惠於低廉的勞工成本，且近年積極推動區域經濟整合，以吸引外資流入，促進產業轉型，主要出口商品遂由紡織品轉為高單價之電子產品。但美中貿易造成全球供應鏈中斷，生產者為避免高工資以及勞動力短缺，訂單轉向越南，出口持續成長與國內需求強勁，推動經濟穩定成長，2017-2019 年在服務業、工業及農業方面實質 GDP 成長率

分別為 6.9%、7.1%及 7%。

表 2、越南國力分析

國家 / 統計項目	越南
GDP(official exchange rate)	0.2619 兆美元
人均 GDP	8,041 美元
經濟結構組成	農業:11.8% ； 工業: 36.9% ； 服務業: 42.4%
人力資源	勞動人口:54,800,000 人
	勞動人口分佈百分比: 農業: 40.3% 工業: 25.7% 服務業: 34%
失業率	2.2%
知識水準(15 歲以上具讀寫能力人口百分比)	95%

資料來源: world bank(2019);美國 CIA(2017);穀研所彙整

五、越南人健康概況

隨著經濟高度發展，越南患有有高血壓、高血脂及高血糖等有代謝症候群之人口數亦逐年增加，觀察 2009~2019 年越南前 12 大死大因之變化(詳如**圖 3**)，中風及缺血性心臟病位居前 2 名不變，值得注意的是，糖尿病、肺癌、肝硬化、慢性腎病及阿茲海默症等死因明顯往前排序，變化最為顯著的死因為糖尿病，由 2009 年，死因排名第 7，躍升到第 3 名。根據越南公共衛生部（Ministry of Health）發布的報告顯示，越南目前約有 5.4%的國民患有糖尿病。越南市場調查公司 Q&Me，訪問了 350 名年齡介於 15-39 歲的河內和胡志明市民眾，發現 53%的消費者每週至少消費 1杯奶茶，含糖飲料深深威脅著越南民眾的健康，再者，血壓及血糖未控制好的病人很容易發展

為慢性腎病，慢性腎病已從 2009 年死因第 12 名，往前排序為第 8 名死因。

越南財政部表示，越南成人肥胖比率已經涵蓋全國 25%的人口，而五歲以下幼童肥胖比率更從 2010 年的 0.6%躍升到 2015 年的 5.3%，這個數字在胡志明市最為尤甚，達到 10.8%，市中心則是 12%。為此 2018 年越南財政部提出含糖飲料稅修正案計畫，將含糖飲料課徵 10%的稅，希望能解決使越南政府以及國內眾多健康專家感到憂心忡忡的成人和幼童肥胖問題，以及其所導致的諸多慢性病。

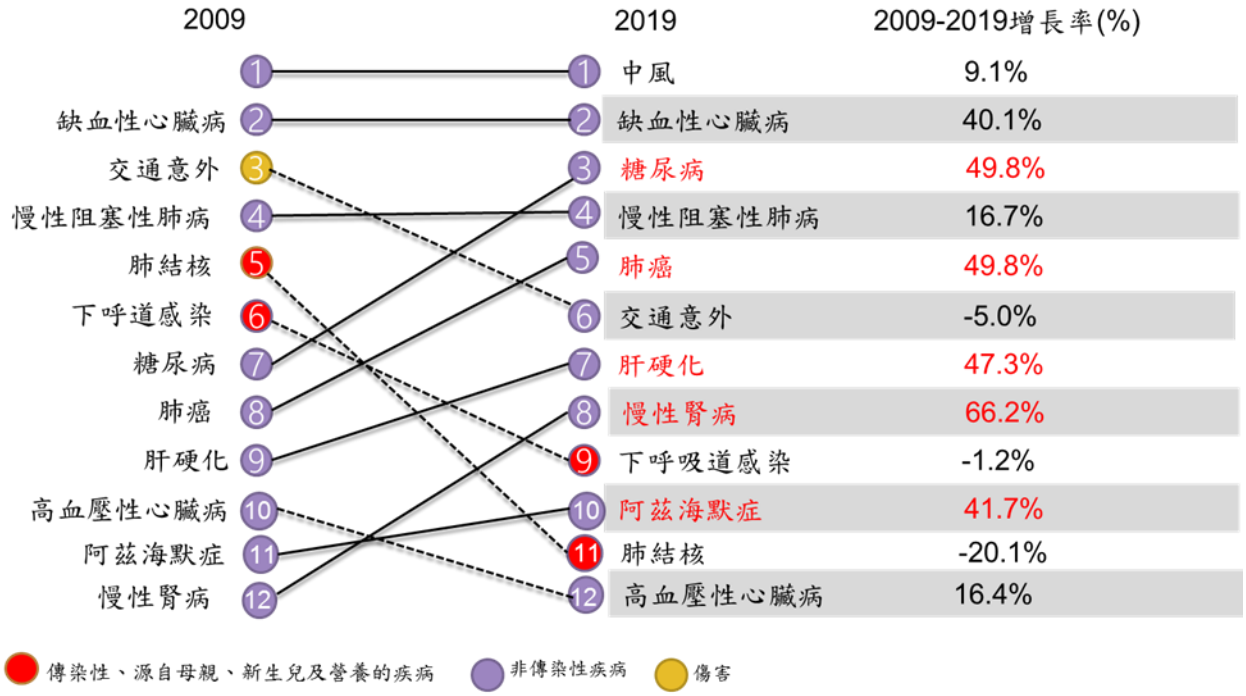


圖 4、2009~2019 越南前 12 大死因

資料來源:Institute for Health Metrics and Evaluation

在越南，空氣污染已成為最嚴重的健康和環境危害之一，多年來，空氣污染對人們健康的影響已經達到驚人的程度。再者，越南男性普遍有抽菸、飲酒的生活習慣，並視之為男子氣慨，很難在生活型態上做改變，根據越南官方 1997 年調查資料顯示，越南抽菸男性民眾佔 50%，女性佔 3%~4%。空氣污染問題及不良的生活習慣使得越南人肺癌從 2009 年十大死因第 8 名，於

2019 年往前躍升為第 5 名，而肝硬化從 2009 年從第 9 名往前躍升為第 7 名。胡志明市醫科大學醫院的統計數據顯示，約有 85,000 越南人患有帕金森氏症(Parkinson disease)，此種影響中樞神經系統的慢性神經退化疾病威脅著越南人的健康。值得關注著的是另一種神經退化的疾病-阿茲海默症，則從在 2019 年擠進越南十大死因第十名。

綜觀近 20 年來越南十大死因之變化，就目前而言，保護心血管、調節血糖、調節血脂、支氣管保護、護腎、護肝、增強記憶力/認知能力等功效訴求的保健營養食品在越南極具發展潛力。

「 2030 年衛生計畫」為越南政府的主要推動的重點政策之一，希望從現在至 2030 年能全面提升越南保健醫療及衛生水準。越南嬰兒的營養不良率約為 23.8%，越南的飲食無法提供足夠的微量營養素，因此，該計畫主要目的包括改善兒童和學生的健康，也要減少對成年人對煙草和酒精的依賴、確保環境衛生和食品安全、促進早期發現和管理多種非傳染性疾病，在社區提供保健服務，並為老年人和工人提供保健照護等。預期未來保健營養食品市場也將隨著越南人重視保健醫療愈益有發展空間。

六、越南 PESTEL 分析

茲將越南政治(Political)、經濟(economic)、社會文化 (socio-cultural)、技術(Technological)、環境(Environmental)及法規(Legal)性各面向進行 PESTEL 分析，如下表所示:

政治因素(Political factor)	經濟因素(Political factor)
● 政治穩定 ● 減少貿易壁壘，加強與國際組織和貿易協定的融合，例如區域全面經濟夥伴關係協定(RCEP）是由由東南亞國家協會十國(含越南)發起，由中國、日本、韓國、澳洲、紐西蘭、印度等與東協有自由貿易協定的六國共同參加，共計16個國家所構成的高級自由貿易協定。 ● 越南政府積極進行健康意識和醫療保健的發展。衛生保健是《 2030年衛生計畫》中政府的主要重點之一。	● GDP、外國直接投資(FDI)及股市有正向發展。 ● 消費者支出快速增長，特別是在食品，牛奶和飲料產品方面
社會文化因素(socio-cultural factor)	**技術因素(Technological factor)**
● 中產階級快速崛起，成為大量具潛力消費人口。 ● 有害的生活方式、不健康食品、菸酒及飲料的攝取增加了亞健康人口。 ● 健康逐漸成為越南人關注的最重要議題。	● 技術快速發展。 ● 著重於基礎建設之投入發展。
環境因素(Environmental factors)	**法規因素(Legal factor)**
● 不同地區氣候多樣 ● 容易發生停水停電 ● 環境污染問題	● 相關法規(包括食安法規)將日益完善也日益嚴格。 ● 高進口關稅。

資料來源:本研究

陸、越南國保健營養食品法規管理現況

一、越南保健營養食品定義及範疇

由於越南經濟環境好轉，經濟成長繼續保持強勁，當地消費者受益於可支配收入水平的提高，加上受到不健康的生活型態及飲食之影響，增加了越南消費者對保健營養食品之需求，保健營養性食品產業目前在越南正蓬勃發展中。為強化保健營養食品食用安全，越南衛生部於 2014 年 11 月 24 日頒布之第 43/2014/TT-BYT 號公告之機能性食品管理法(Providing the management of functional foods, Government's Decree No. 43/2014/TT-BYT)(詳如**附錄一**)。該規範所稱的機能性食品(functional foods)，越南文為"**thực phẩm chực nẳng**"，範圍涵蓋補充食品(supplemented foods)及健康補充品(health supplements)/食品補充品(food supplements)/膳食補充品(dietary supplements)、醫療食品(medical food)(用於特定醫療目的之食品)，以及特殊

膳食食品，涵蓋整個保健營養食品範疇，故本研究一律將”機能性食品(functional foods)”統稱為”保健營養食品”，茲將越南各類保健營養食品定義，如下表:

類別	定義
補充食品(Supplemented foods)	指添加健康的微量營養素和元素的普通食品，例如添加維生素，礦物質，氨基酸，脂肪酸，酵素，益生菌，益生元(prebiotics)以及其他含有生物活性物質之普通食品(ordinary foods)。
健康補充品/食品補充品/膳食補充品(Health supplements/food supplements/dietary supplements)	係指加工過的產品，在膠囊，丸劑，片劑，膠(glue) ，顆粒，粉末或液體型態中進行其他加工後，包含以下一種或多種物質的混合物： a)維生素，礦物質，氨基酸，脂肪酸，酵素、益生菌含有其他生物活性成份之物質 b)源自動物、礦物質和植物的自然來源的生物活性成分，例如相關萃取物、細分物質、濃縮物、及其代謝物等類型。
醫療食品 (Medical foods)	醫療食品或針對特定醫療目的使用之食品，意指為了針對病人進行膳食管理或者可能只是為了醫療監控使之目的而提供的經口餵食或管灌的食品。
特殊膳食食品(Foods for special dietary uses for dieters)	依食品法典委員會規範下針對節食者、年長者及特殊人群所提供的之加工或混合食品，透過特殊配方以滿足特殊飲食要求，具體取決於使用者的習性或病理狀況以及特定的疾病。 這些食品的成分必須與具有相同本質的普通食品有所區分（如果有）。

資料來源: 越南衛生部於 2014 年 11 月 24 日頒布之第 43/2014/TT-BYT 號公告之機能性食品管理規範;穀研所彙整

二、越南保健營養食品原料管理

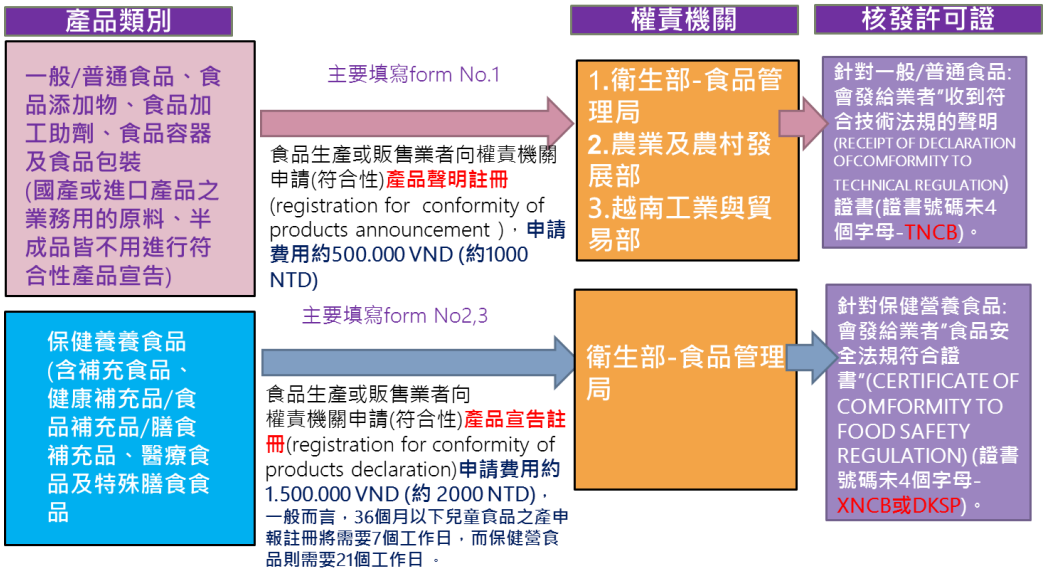
越南保健營養食之原料管理主要採行正面表列及負面表列並行管理，目前能使用的維生素包括脂溶性維生素(A、D、E、K)及水溶性維

生素 B1、B2、B6、B12、維生素 C、生物素、葉酸、泛酸及菸鹼酸等共 13 項(採正面表列管理)，越南衛生部已規範准許使用的來源，例如維生素 A 准許使用視黃醇(Retinol)、乙酸視黃醇(Retinyl acetate) 、棕櫚酸視黃酯(Retinyl palmitate - Beta-carotene)等來源。而目前能使用的礦物質原料包括鈣、鎂、鐵、銅、碘、鋅、錳、鈉、鉀、硒、3 價鉻、6 價鉬、氟、硼及矽共 15 種，同樣需依越南衛生部已規範准許使用的來源進行使用，亦為正面表列方式。

另外，針對動、植物及微生物來源原料之管理，則是採用負面表列方式，不能使用目前東協所公告的負面表列 40 種原料清單，例如含心臟甙（例如腺嘌呤毒素）(Cardiac glycosides, (e.g. adonitoxin))的 Pheasant's eye，含馬兜鈴酸(Aristolochic acid)的鵜鶘花(Pelican flower)等各類含有毒植物鹼的植物來源原料。越南目前亦無新穎性食品(novel foods)相關管理法規。

三、越南保健營養食品註冊程序

越南保健營養食品之管理採上市前預審制度，進口商或製造商必需向管理權責單位即越南衛生部食品管理局(Vietnam Food Administration, The Ministry of Health)提出產品宣告註冊(registration for conformity of products declaration)申請(**詳如圖 5**)，其目的是要求業者需保證上市後的產品配方組成、產品標示及健康宣稱(若有)、品質、衛生安全等都需與當初產品宣告註冊時所提供的文件內容相符，是一種符合法規性的註冊方式，通過越南食品管理局之業者會被核發「食品安全法規符合證書(CERTIFICATE OF COMFORMITY TO FOOD SAFETY REGULATION)」(**詳如圖 6**)，此證書相當於產品流通許可證，所有產品必需取得此許可證才能在市面上流通販售。保健營養食品產品宣告註冊申請通常需要 7 個工作天，每件(每一種配方)申請費用約 1,500,000 越南盾(約 2000 台幣)。此外，國產或進口產品之業務用原料、半成品不用進行產品聲明或宣告註冊。



**註:產品宣告註冊及產品申報註最大不同，在於產品聲明註冊不需要提交 GMP 證書、與產品相關成份檢驗報告、功效科學驗證等資料，而產品宣告註冊需要 GMP 證書、與產品相關成份檢驗報告。

圖 5、越南食品(含保健食品)上市前之產品註冊之預審制度

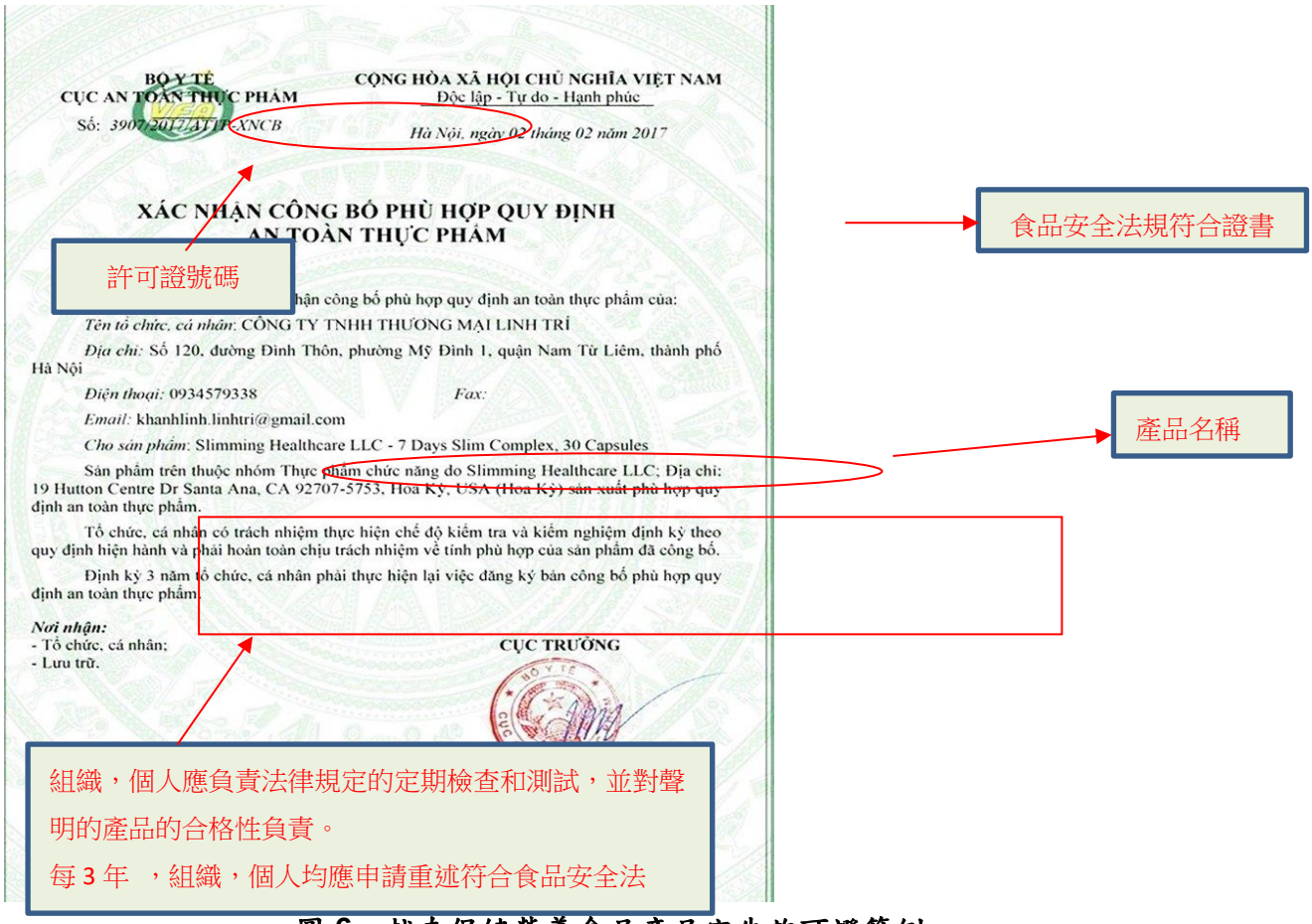


圖 6、越南保健營養食品產品宣告許可證範例

資料來源:Slimming Healthcare 公司網站

以越南進口保健營養食品而言，申請產品宣告註冊許可證需要提交的文件資料，如下:

i.法規符合性宣告註冊申請表(需填寫法令規定的官方制式表格 –Form No2,3 及 Appendix 02)(詳如**附錄三、四**)

ii.產品規格表(法令中提供的官方制式表格- Appendix 03a (詳如**附錄五**)(組織或個人需加蓋公章)

iii.原產國主管當局頒發的自由銷售證明(正本、公證副本或合法副本)或健康證書或同等證書，表明該產品是安全的並符合食品安全法規（原件或經過公證的副本;或領事館確認之合法副本）。

iv.產品檢驗結果報告:可追溯至最多 12 個月，包括主要關鍵質量和安全標準。實驗室必須是由政府機構授權或認可的獨立實驗室；正本或經公證的副本，或由越南授權認可的機構（原件或公證的副本或領事館公證的合法副本）

v. 定期監測計劃 (Periodic monitoring plan, authenticated by the organization or individual)(蓋組織或個人公章)

vi. 產品標籤之樣本:原產國之原文標籤及越文補充標籤(組織或個人需加蓋公章)。

vii. 提交成品之樣品

viii.食品貿易部門的商業登記證或食品進口個人和組織具有合法身份的證明，如商業登記證(組織或個人需加蓋公章)。

ix. 食品安全要求滿意證明書(Certificate of satisfaction of food safety requirements)，例如依法獲得符合現行食品安全法規之相關證明(組織或個人需加蓋公章)。自 2019 年 7 月 1 日起，保健營養食品(含補充食品、膳食補充品、醫療食品及特殊膳食食品)皆須檢附 GMP 證明，或其他同等效力之證明文件。

x. HACCP 或 ISO 22000 證書或同等證書:應提交經公證的副本；或與原始副本一起，以供參考。

xi.每種成分有助於生成產品宣告機能性之的科學驗證相關文件及資料(組織或個人需加蓋公章)。

也因為 2019 年 7 月 1 日起，越南食品局要求國外進口保健營養食品(含補充食品、膳食補充品、醫療食品及特殊膳食食品)在申請產品宣告註冊需檢附 GMP 證明，或其他同等效力之證明文件，受國內食品 GMP

制度轉型影響，也讓業者透過當地進口商申請越南進口保健營養食品之產品宣告註冊時受阻，而間接影響出口，期待 TFDA 進期推動的保健營養食品 GMP 認證制度可緩解外銷越南困境。

四、越南保健營養食品含量宣稱及健康宣稱(Health claim)管理制度

依現行越南機能性食品管理法(公告號:43/2014/TT-BYT)(詳如**附錄一**)規範各類保健營養食品在進行含量宣稱及健康宣稱應遵循的原則，分述如下:

(一) 補充食品(supplemented foods):

1. 含量宣稱

食品添加維生素、礦物質、氨基酸、脂肪酸、酵素、益生菌、益生元時或其他生物活性的物質時，其產品成份應基於越南的營養建議攝取量(RNI 值)(需參考法規公告號 No. 43/2014/TT-BYT 之附錄 I)

進行宣告，具體如下：

a .當添加的物質含量低於 RNI 值的 10%時，則產品不能宣告含此物質。

b.當物質的含量為 RNI 值的 10%以上時，應宣告該產品的每份或每 100 克產品中此物質名稱及其含量。

c.製造商應計算出的補充食品含的維生素及礦物質，不得超過每天最大攝入限量(RNI 值)(需參考法規公告號 No. 43/2014/TT-BYT 之附錄 II))。如果越南沒有 RNI 值和最大攝入限量之規範，則可沿用 CODEX 或相關國際組織之規定。

2.健康宣稱

a.當添加之物質含量超過或等於 RNI 值之 10%，且附上科學證據，才能進行健康宣稱。

b.若添加目前公告之 RNI 未提及的成分，這類物質的在產品標示上需滿足下列其中一種條件才能進行康宣稱:

(1)該成分之健康宣稱有科學驗證。

(2)該成分建議攝取量已發表於科學驗證文獻/期刊。

c.健康宣稱必須清楚文字化呈現，所宣稱的適用對象及建議攝取量，需與產品宣告註冊時提供之文件一致。

(二)健康補充品(health supplements)/食品補充品(food supplements)/膳食補充品(dietary supplements)

1.含量宣稱

a.在該產品主要的功效成分須列在第一個，並將其全名及其含量標示出來。其他成分則依照其總量由多排列至最少。

b.由製造商計算的維生素及礦物質之每日攝取量，必須至少達到 RNI 值的 15%。(RNI 值需參考法規公告號 No. 43/2014/TT-BYT 之附錄 I)

c.由生產者計算的維生素及礦物質之每日建議攝取量，最大值不得超過法規公告號 No. 43/2014/TT-BYT 之附錄 II 之限值規定)

d.維生素及礦物質含量須標示在產品標示上，可以產品每日建議攝取量或份量(Serving size)作為基準，並以數字或 RNI 百分比呈現。如果越南沒有 RNI 和最大攝入限制量，則可沿用 CODEX 或相關國際組織之規定。

2.健康宣稱

a.健康宣稱必須嚴格的基於產品的本質進行產品宣告註冊:只有在作為主要功效之主要成分或功效成分的組成具有科學證據時才能被宣稱，而非在進行產品宣告註冊申請時將有效成分列出。

b.健康宣稱、攝取量、使用者/使用說明必須與進行產品宣告註冊時之提出的卷宗文件內容一致。

c.當在產品中的維生素、礦物質、生物活性元素之含量小於科學文件中所陳述的，則該功效成分不能被宣告。

d.當產品中的維生素、礦物質、生物活性物質之含量需等同於科學文件中所提及的含量，且附上適用者及攝取量之描述，該產品功效即可被宣告。

e.若該成分並無被目前公告的 RNI 提及，則須在產品宣告註冊時提供科學文件以證明該成分具有功效，並同時附上建議攝取量。

(三)醫療食品(medical food)以及特殊膳食食品(foods for special dietary uses)

1.含量宣稱

a)產品的成分名稱需全部列出，並依照其總量由最多排至最少

b)基於 RNI 值為對應值,標示維生素及礦物質的每份含量或每 100 公克有多少含量應宣告之。

c)由生產者計算的維生素及礦物質之每日建議攝取量的最大值不得超過法規公告號 No. 43/2014/TT-BYT 之附錄 II 所提供之最大攝取限量。如果越南沒有 RNI 和最大攝入限制量，則可沿用 CODEX 或相關國際組織之規定。

2. 健康宣稱

此宣告必須清楚的陳述特定使用者適用的營養素對應值(nutritive response levels)。

五、越南對保健營養食品功效測試報告之要求

越南食品安全管理局宣佈自 2016 年起，保健營養食品製造商的生產流程必須全部達到 GMP 品質標準，並經實際臨床試驗;公布產品對人體健康有好處的功能時，必須說明該食品曾經對多少人進行臨床試驗，以及試驗結果等說科學數據，由衛生部科學委員會作客觀評估。

越南對保健營養食品功效測試報告之要求如下:

1.基於人類健康產生功效之產品，須根據越南政府法規公告號第 43/2014/TT 號法之第 4 條進行功效測試報告，包括以下規範:

a)具有疾病治療支持效果之宣告建議(announced recommendations)的產品。

b) 已宣告新功效但尚未在其他國家獲得使用許可之產品；

c) 含有尚未批准使用之新活性成份的產品；

d)首次上市且其配方與已進行科學驗證之產品配方不同之健康補充品(health supplements) 。

e)首次上市之動植物來源產品，其成分與已在科學期刊發表之傳統醫藥產品不同。

f)醫療用食品及特殊膳食食品，其尚未被出口國主管機關或授權機構、原產國法律允許，或在標籤上的功效、適用者、使用說明尚未被允許標示之產品。

2.產品的人體健康效用測試需在具有科學研究功能的機構下進行。特別是那些廠商已宣告有關疾病治療支持效果的產品，需在具有科研功能的省級(或以上)之醫院進行(研究型醫院)。

3.如果在海外進行產品的人體健康效用測試(人體臨床試驗)，則應在被出口國主管機關認可的單位下進行，或將測試結果發表於科學期刊。

4.越南食品管理局（衛生部）將組成一個由相關領域的專家組成的科學委員會，以評估有關產品效用測試報告和已經宣布的科學證據。科學理事會的組織和運作必須遵守法律。

六、越南保健營養食品產品標示規範

越南保健營養食品產品標示需依現行機能性食品管理法及食品(第 43/2014/TT-BYT 號公告)及食品添加物及包裝食品加工助劑之標示指引(第 34/2014/TTLT-BYT 號公告)(詳如**附錄二**)進行標示，茲將標示重點摘錄如下:

(一) 保健營食品強制性標示項目及其注意事項

1.**產品名稱**:產品名稱需與產品宣告註冊的名稱或者產品宣告准證的名稱一致；若為外文必需翻成越南文；保健營養食品(health supplement)“一語必須以越南語註明在標籤的主要位置。

2. **產品組成(成分內容或成分含量宣稱)**: 組成必須以成分的重量降序在成份列表中列出成分及其含量(但佔終產品 5%以下的成分除外)。混合物則在括弧之間宣稱。必須標明過敏原(過敏原清單包括穀物和由含麩質之穀物製成的食品即小麥、黑麥、大麥、燕麥、斯佩爾特(spelt)及其雜交品種及其產品;甲殼類動物及其產品;雞蛋及其製品;

魚及其製品；花生、大豆及其製品；牛奶和奶製品(含乳糖)；堅果和堅果產品；濃度為 10 毫克/千克含量以上的亞硫酸鹽(亞硫酸鹽)。調味料、香料須標示天然來源或人工合成。

3. **產地來源**: 如果包裝的所在國家與製造國家不同，則兩者皆須在包裝上註明。
4. **負責廠商及製造商名稱及地址**: 標示負責該食品之組織/個人的名稱與地址。對於進口產品其標籤上必須顯示製造商的名稱和地址以及進口商的名稱和地址，對於國產品，標籤上必須顯示標示製造商及地址。
5. **產品數量及淨重**:使用國際單位系統(international system of units)。液體的實際體積和固體食品的淨重。
6. **產品宣告准證號碼**: 供應商向越南食品管理局申請的產品宣告註冊，通過許可的準證號碼(相當於產品流通許可證號碼-(例如:N0.XXX/通過年份/ATTP-XNCB)。
7. **製造日期**:可標示為「生產日期」或「NSX」(越南文中「生產日期」的縮寫)。月、日應以 2 位元編碼；年以 2 位元或 4 位元編碼註明。
8. **有效期限及貯存方式說明**: 若有效期限超過 3 個月，則只需標明月和年。必須偕同貯存方式說明一起寫入(如有)。
9. **關於食品衛生安全相關的建議及警語**:產品有助於健康之建議必須根據科學證據，且必須於產品宣告中說明。須留意，因為廣告目的而指出的產品某些成份，並不適用於含相似成份或含量的相同品系的產品作為廣告使用。
10. **使用說明**: 如果標示面積小於 10cm^2，則必須附帶單獨的使用說明在產品包裝盒、袋中。
11. **營養資訊**: 政府鼓勵個人與組織在營養標示的方面能遵照 Codex 法典之規定。

強制性資訊之最低高度為 1.2 mm。若包裝的一側小於 80cm^2，則文字的最低高度為 0.9 mm。字體顏色必須與標籤背景色形成對比。

必須要明顯標示的字包括保健營養食品(health foods /functional foods)、**此食品並非藥品，不能取代藥品** (The foodstuff is not medicine and cannot replace medicine)。

(二)需強制以越南文進行標示之內容規範

各類保健營養食品需強制以越南文進行標示之內容規範，如下:

1. **補充食品**(supplemented foods):

在產品標籤的主要位置以越南文標示本品為「補充食品」、產品推薦用戶/對象、建議用量(建議用量需參考 RNI 或有科學驗證依據)。

2. **健康補充品** (health supplements)/ **食品補充品** (food supplements)/**膳食補充品**(dietary supplements)

在產品標籤的主要位置以越南文標示本品為「健康補充品」以區分普通食品及藥品。若使用產品功效成份做為產品名稱時，必須在標籤主要位置以越南文提供下列資訊:

a) 假如可以確認活性成份含量，則標示活性成份含量。

b) 假如無法確認活性成份含量，則標示主要成份含量。

c) 不能標示與藥物動力學有關的內容。

d) 其他建議事項及產品有關警語，並應加註"本品不是藥品不能代替藥品"， 此短語必須與標籤的背景色形成對比，並且字母之間的距離必須為 1.2 毫米。如果包裝的一側小於 80 平方厘米，則字母必須至少為 0.9 毫米。

3. **醫療食品**(medical food)**以及特殊膳食食品**(foods for special dietary uses)**越文標示規範需符合下列規定**:

a) 在標籤的主要位置，必須以越南文標示“醫療食品”，以區分普通食品及醫療食品，以及一句話：“本品需健康工作者(health workers)的監督下使用”。

b) 在標籤的主要位置，必須以越南文標示“特殊膳食品”，以區分普通食品及特殊膳食品進行區分，以及一句話：“本品需在健康工作者(health workers)的監督下使用”。

c) 必須有清潔和製備方面的詳細說明指引，以確保食品衛生安全及針對適合用戶/使用對象之健康狀況提供適當營養。

d) 產品說明指引必須清晰、詳細，如果有不適用人群則需加以說明。

(三)有關對比營養標示之規範

對於熱量、脂肪、糖及鈉含量相關對比營養標示之建議，允許有以下情況:

1.熱量:

a)低熱量: 固體食品為 1 每 100 公克含 40 千卡以下熱量/百公(<40/100(Kcal/g)、 固體食品含 170 千焦耳以下熱量或者液體食品為每 100 公克含 20 千卡以下熱量(<20/100(Kcal/g) 、(液體食品含 80 千焦耳熱量)。

b)沒有熱量:液體食品為 1 每 100 毫升含 4 千卡熱量以下(<4/100(Kcal/mL))。

2.脂肪:

a)低脂含量:固體食品每 100 公克含 3 克以下脂肪(<3/100(g/g))或液體食品每 100 毫升含 1.5 克以下脂肪(<1.5/100(g/mL))。

b)不含脂肪:每 100 克固體食品或 100 毫升以上液體食品含 0.5 克以下脂肪

3.糖:

c)無糖:每 100 克固體食品或 100 毫升以上液體食品含 0.5 克以下糖

4.鈉:

a)少鈉: 每 100 克食品含 0.12 克以下之鈉(< 0.12/100(g/g)

b)低鈉: 每 100 克食品含 0.04 克以下之鈉(<0.04/100(g/g)

c)不含鈉: 100 克食品含 0.05 克以下之鈉(<0.005/100(g/g)

七、越南保健營養食品廣告管理規範

在越南，食品(含保健營養食品)在進行產品廣告之前需提交下列資料給權責機關進行廣告註冊申請，保健營養食品之權責機關為越南食品管理局:

a)廣告內容確認申請表 (Form No.10)及廣告內容註冊申請表(Form No.11)(詳如**附錄三**)

b)由主管機構核發的”食品安全合格證書”或”食品安全保證條件的有效檢驗結果”的認證副本(適用於國內製造商和貿易商)。

c)製造商/貿易商商業登記證書(副本;組織或個人需加蓋公章)

d)食品安全法規符合證書(認證副本;組織或個人需加蓋公章)。

e)證明產品品質和使用與註冊廣告內容相符的科學文件(組織或個人需加蓋公章)。

f)產品標籤樣本(組織或個人需加蓋公章)。；

g)對於進口基改和照射食品、自由銷售證明(CFS(the Certificate of Free Sate))和其他法律規定的相關文件。

h)廣告草案(影片、圖片、報告或文章)。

g) 機構的書面授權(委由廣告商註冊者)。

用於證明廣告內容的申請文件中的文件必須以越南文表示；外語文件必須翻譯成越南文並經過公證。廣告必須有一條建議：“此種食品不是藥品，沒有任何作用取代藥品”；文字必須清晰且與背景形成對照顏色。

八、越南保健營養食品衛生管理規範

保健營養食品為食品之一環,越南目前並無專法規範保健營養食品之衛生標準，需依現行相關食品衛生標準進行產品的衛生管理，茲將主要依據之標準規範整理如下:

(一)食品中黴菌毒素和重金屬最大殘留限量相關技術規範 (Circular 2/2011/TT-BYT promulgating)包含(1) 食品中最大的黴菌毒素容許量(National Technical Regulation QCVN 8-1:2011/BYT regarding the maximum level of mycotoxin allowed in food)及(2)食品中重金屬最大容許量(National Technical Regulation QCVN 8-2:2011/BYT regarding the maximum level of heavy metals allowed in food)

(二)食品中微生物污染物質限量標準(Circular 5/TT-BTY updating the maximum limits of microbiological contamination in certain food products):此標準規範牛乳及其乳製品，蛋及其蛋製品，肉及肉製品，水產產品、0至36個月大的兒童營養品、 瓶裝天然水，瓶裝

水和即用型冰、奶油、蔬菜和水果、 及蔬果產品等食品相關管理要求。)

(三)與食品直接接觸之塑膠包裝及工具的衛生與安全(公告號 QCVN 12-2:2011/BYT)

九、越南進口保健營養食品規範

(一)國產保健營養食品出口至越南現況分析

越南的消費者對於進口產品具有偏好，分析 2010~2019 年台灣出口至越南之保健營養食品出口值得知(如**圖 7**)，成份相近於錠狀、膠囊型態食品之一般食品型態食品(ccc code:210699903)，至 2015 年開始有顯著成長，直至 2019 年出口值已達新台幣 8 億元，反觀，錠狀、膠囊型態食品 (ccc code:21069099208) 出口值在 2016 年達到新台幣 3.6 億元後，開始顯著的下滑，2019 年出口值僅有 2,358 萬元，可能與越南食品管理局宣佈自 2016 年起，保健營養食品製造商的生產流程必須全部達到 GMP 品質標準，而 2016 年時國內食品 GMP 轉型影響，國內業者無法提供官方 GMP，無法順利申請進口膳食補充品宣告註冊，而使得廠商轉以原料/素材或一般食品型態之保健營養食品出口至當地。

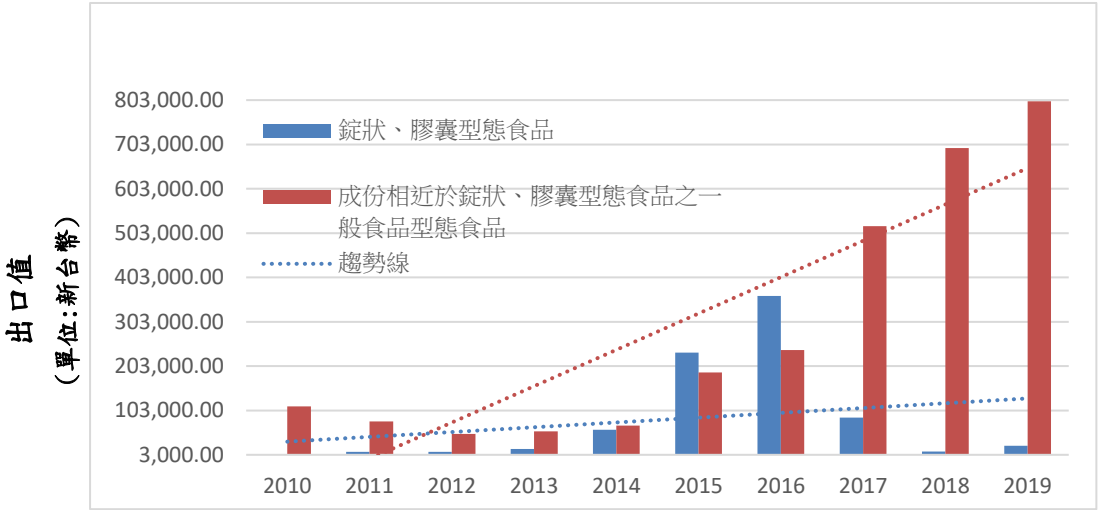


圖 7、2010~2019 年台灣出口至越南之保健營養食品出口值

資料來源:中華民國海關資料庫;穀研所彙整

(二)越南進口/輸入保健營養食品管理程序

越南進口/輸入保健營養食品管理程序詳如**圖 8** 所示。國產保健營養食品輸入越南時需與當地業者合作如進口商、經銷商或代理商等，透過當地業者進行產品宣告註冊，取得食品安全法規符合性證書(相當於產品流通許可證)，即可進一步進行海關註冊，準備將產品輸入越南，海關註冊需提交下列資料:

a)每批貨物符合進口食品安全規定的檢驗證書(如 COA)

b)越南衛生部食品管理局核發的產品宣告註冊許可證(Certification of registered product declaration) 即(符合食品安全法規證書(certification of conformity to food safety regulation)) (副本)

c)貨物清單(包裝清單)(副本)。

d)出口國(來源國)當局機構核發的食品安全證書(certification of food safety) (原件或經過公證的副本;或領事館確認之合法副本):除了由外國漁船捕獲加工，然後直接出售給越南的水產品之外，如果含有越南食品安全法實施細則(Circular No. 15/2018/ND-CP)第 14 條所規定的產品-陸生、水產及動物產品及植物產品，則必須取得出口國(原國)當局機構發布的食品安全證書(所有食品製造商及銷售商均須取得食品安全證書)。自 2019 年 7 月 1 日起，保健營養食品(含補充食品、膳食補充品、醫療食品及特殊膳食食品)皆須檢附 GMP 證明，或其他同等效力之證明文件。

e)來自原產國的自由銷售證明(原件或經過公證的副本;或領事館確認之合法副本)。

當貨品到達港口，進行報關前，進口廠商須向相關衛生主管機構(例如:品質保證及檢驗中心、食品安全衛生國家研究所)進行登記，以進行檢查，需填寫進口食品之食品安全檢查註冊申請表(Form No.4)。建議業者在國產保健營養食品輸入越南時，於報關前，透過進口商向當地衛生檢驗單位申請食品安全衛生檢查之同時，能將產品的相關檢驗結果報告資料及貨品清單一律提交，可加速產品進口之順暢度。檢查員於倉庫進行貨品檢查並抽樣進行產品檢驗，產品檢驗結果合格，則提交結果給海關部門，以進行通關/。若不合格，

則聯絡進口商廠商進行後續理，如產品出口或在當地進行銷毀。若被通知需進行嚴格進口檢查之產品，連續三次符合嚴格進口檢查方法之標準，並取得到符合標準確認結果通知書(原件) ，則檢查方法可能從嚴格檢查變更為常規檢查。

產品在進行報關時，需依產品項目之不同繳交進口稅，主要為進口稅及增值稅，一般而言，越南保健營養食品進口稅率約為15%(詳如**表 3**)與馬來西亞、緬甸相同。由於日本、韓國及中國大陸與越南簽署自由貿易協定(FTA)，這些國家的保健營養食品出口至越南免被課徵關稅，台灣若無法積極爭取與東協各國(含越南)簽署相關自由貿易協定，想必將不利國內保健營養食品產業走出國際市場。

表 3、東協各國進口食品關稅稅率及增值稅稅率列表

進口國 關稅 產品類別及CCC code	越南 (Vietnam)	柬埔寨 (Cambodia)	印度尼西亞 (Indonisia)	寮國 (Laos)	馬來西亞 (Malaysia)	緬甸 (Myanmar)	菲律賓 (Philippines)	新加坡 (Singapore)	泰國 (Thailand)	汶萊 (Brunei)
其他未列名食物調製品(成份相近於錠劑、膠囊型態食品之一般食品型態食品)/錠劑、膠囊型態食品(兩種品項ccc code前8碼:2106.90.99)	進口稅:15% 增值稅(VAT):10%	進口稅:7% 增值稅(VAT):0%	進口稅:5% 增值稅(VAT):10%	進口稅:0 增值稅(VAT):0	進口稅:15% 增值稅(VAT):5%	進口稅:15% 增值稅(VAT):5%	進口稅:7% 增值稅(VAT):12%	進口稅:0% 增值稅(VAT):7%	進口稅:5% 增值稅(VAT):7%	進口稅:0 增值稅(VAT):0
其他非碳酸性飲料(ccc code前8碼:2202.99.50)	進口稅:30% 增值稅(VAT):5%	進口稅:35% 增值稅(VAT):10%	進口稅:20% 增值稅(VAT):10%	進口稅:0 增值稅(VAT):0	進口稅:20% 增值稅(VAT):10%	進口稅10% 增值稅(VAT):5%	進口稅10% 增值稅(VAT):12%	進口稅0% 增值稅(VAT):7%	進口稅:0 增值稅(VAT):0	進口稅:0 增值稅(VAT):0

資料來源:外貿實務查詢服務網 http://wmsw.mofcom.gov.cn/wmsw/ ;穀研所彙整

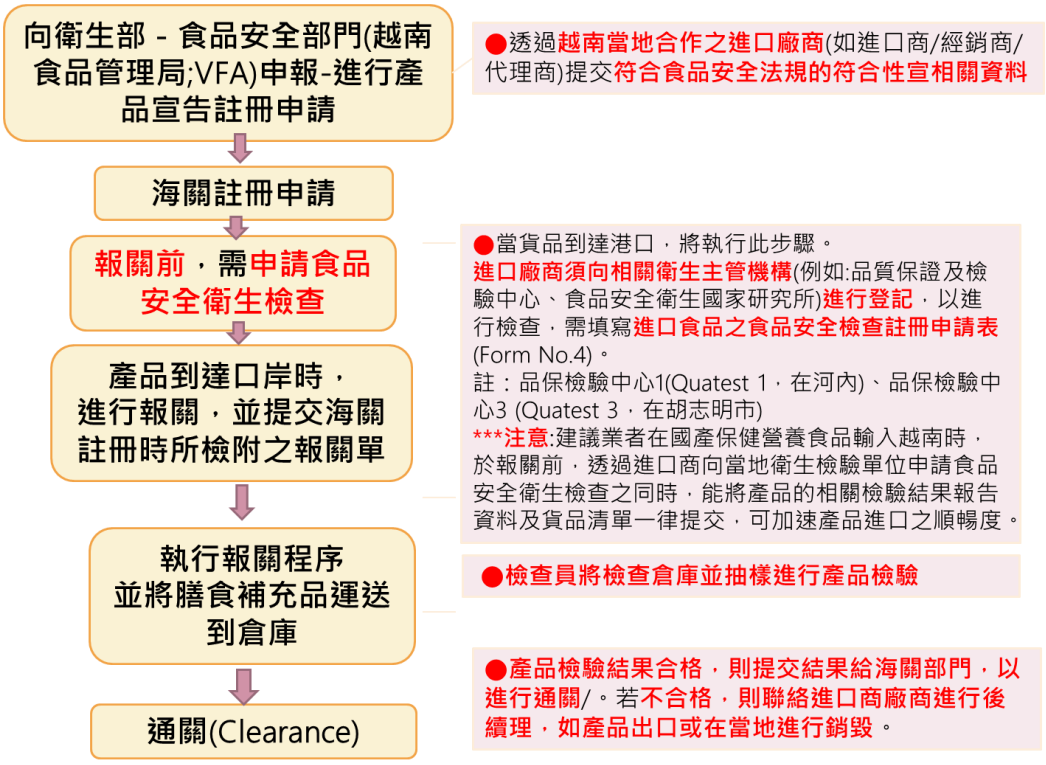
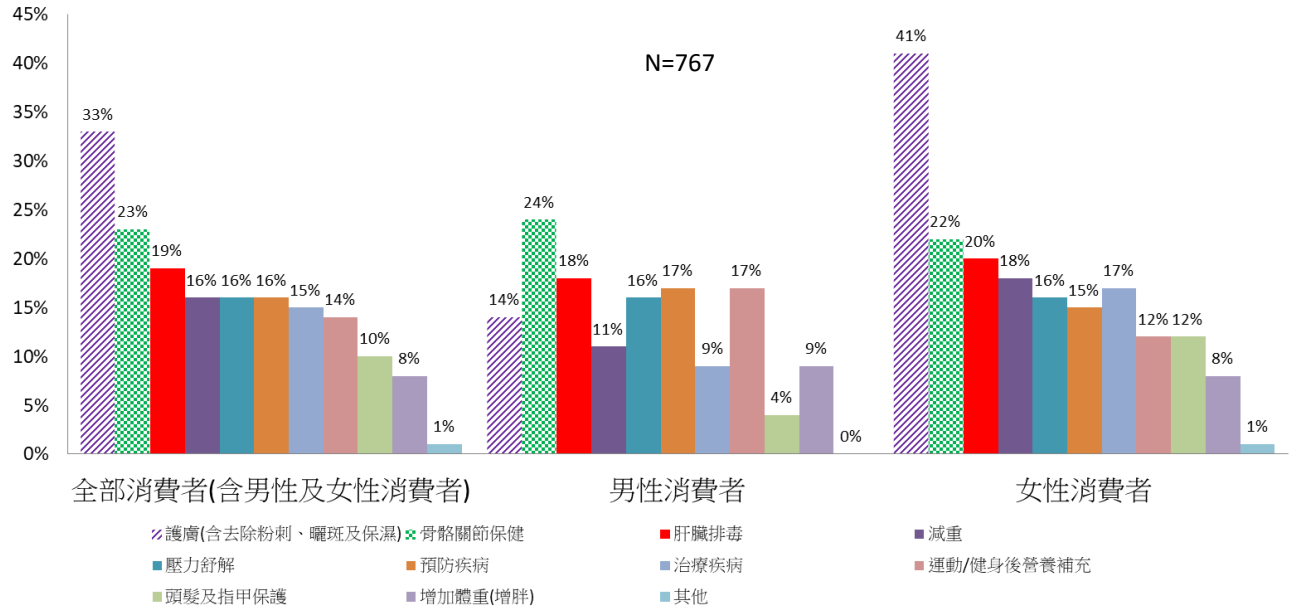


圖 8、越南保健營養食品進口流程-以膳食補充品為例

資料來源:越南 海關程序、檢查指南(公告號 No.08/2015/ND-CP);穀研所彙整

柒、越南保健營養食品消費者需求現況

普遍而言，越南消費者主要購買保健營養食品的前三大消費動機包括護膚(33%)、骨骼關節保護(23%)、肝臟排毒(19%)，其中男性消費者最大的購買動機為骨骼、關節保護，此動機亦包含骨骼增高之訴求，而女性消費者購買最大動機為護膚(詳如**圖 12**)。近來越南人口逐漸老齡化，而年輕人骨關節炎的患病率正在穩步上升，再者在聯合國最新的一次調查之中，越南男性的平均身高為 162.1 公分，女性的平均身高為 152.2 公分，和很多亞洲國家相比這個平均值要低很多，使得骨骼關節保護(含增高訴求)相關保健營養食品有其市場利基，值得關注。



資料來源:dream incubator Inc.管理顧問公司(2015)

圖 12、越南消費者食用保健營養食品之動機調查

整體而言，越南消費族群購買保健營養食品前四大原因分別為親朋好友介紹(43%)、信任品牌(40%)、經濟能承擔(34%)、來自醫生推薦(34%)及認為沒有副作用(29%)(詳如**圖 13**)，其中 18 歲以下的消費者願意購買保健營養食品之原因主要為醫生推薦，而 18~28 歲消費者較傾向購買自己信任品牌之保健營養食品，而 26~30 歲及 30 歲以上年齡層的消費者通常透過親朋好友介紹購買保健營養食品。一般而言，越南消費者取得保健營養食品資訊透過的前四大管道分別為親朋好友介紹(55%)、醫生建議(44%)、藥局的藥師建議(36%)、電視廣告(35%) (詳如**圖 14**)，綜觀而論，在越南透過直銷及包括藥局在內的醫療體系通路較有助於產品銷售。

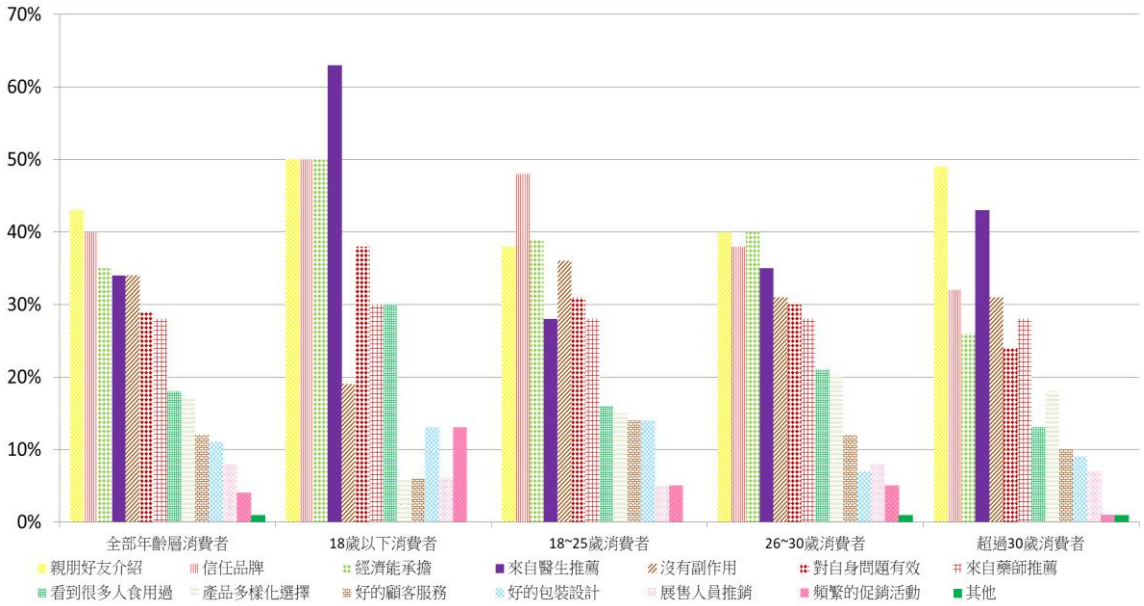


圖 13、各年齡層越南消費族群購買保健營養食品原因

資料來源: dream incubator Inc.管理顧問公司(2015)

越南消費者採買進口保健營養食品時，最偏好的產地/國前三名為美國、日本及韓國，詳如**圖 14**，主要透過連鎖藥局購買保健營養食品，詳如**圖 15**，多數人每次購買保健營養食品之平均花費約在 10~25 美元。

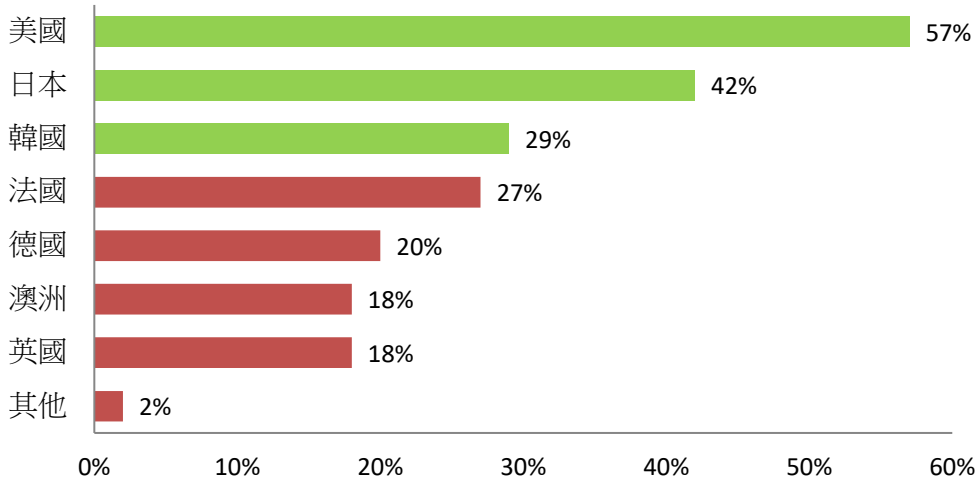


圖 14、越南消費者採買進口保健營養食品偏好之原產國分佈

資料來源: dream incubator Inc.管理顧問公司(2015)

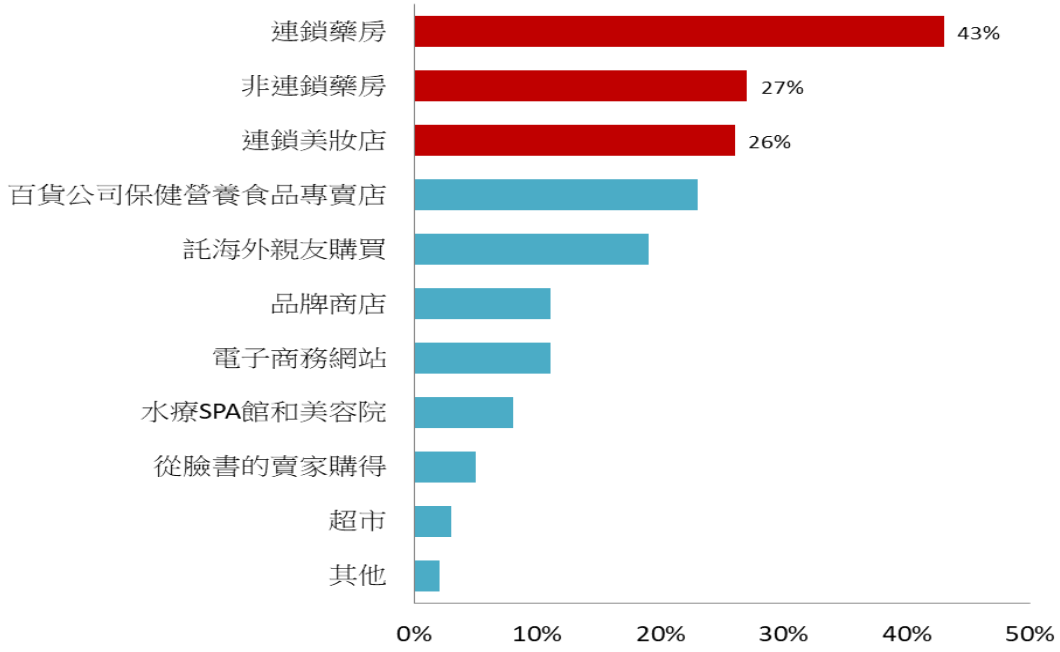


圖 15、越南消費者習慣購買保健養食品之通路分佈

資料來源: dream incubator Inc.管理顧問公司(2015)

越南民眾在購買健康即食食品(Health ready to eat foods)時，最關注的健康議題為產品的效期(72.8%)、具健康機能性(72.8%)、有助免疫機能(65.6%)、關注腸胃道保健(61.6%)及含高營養素來源(54.6%)(**圖 12**)等，因此，在銷佈局越南保健營養食品市場時，需特別著重健康機能及營養宣稱，以利吸引消費者購買，免疫調節及腸胃道保健訴求產品亦具市場潛力，符合一般越南消費大眾之需求，可優先作為市場開發之產品項目。

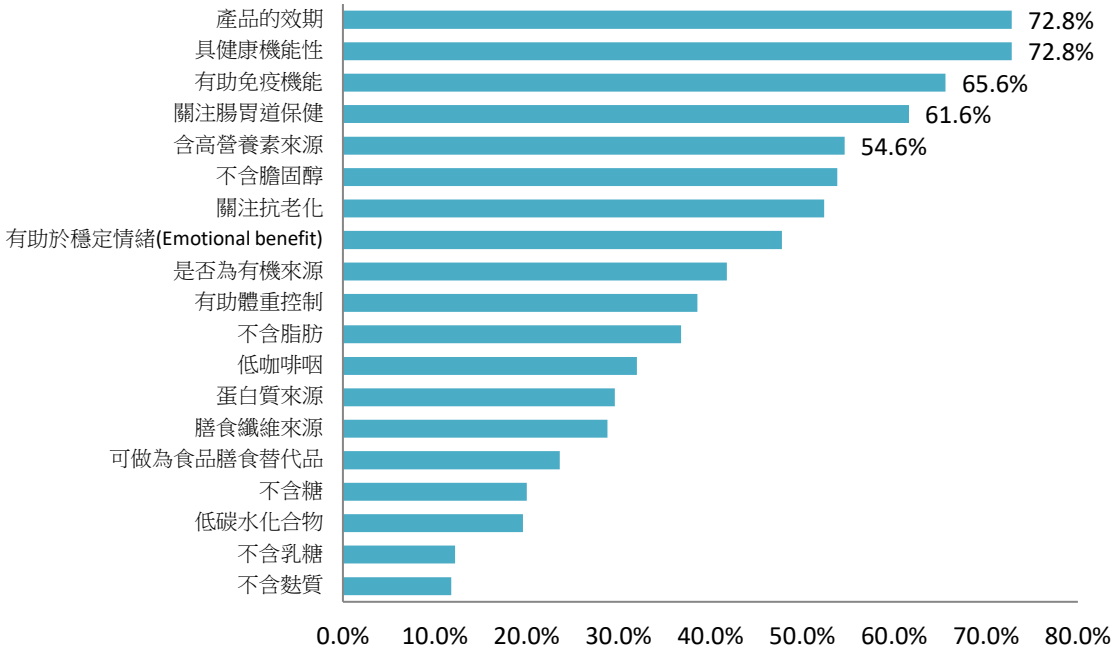


圖 12、越南消費者健康即食食品時關注議題

資料來源: W&S market research 公司(2015)

捌、越南保健營養食品市場現況

一、越南保健營養食品市場規模推估

過去近 20 年越南健康補充品產業發生巨大變化，從 2000 年越南當地只 13 家製造商，約生產 63 種品項健康補充品(health supplement)，到 2017 年成長至 4,190 家製造商約生產 10,930 種品項健康補充品(health supplement)。越南全國超過 90%的藥局皆有販售健康補充品，直銷、藥局及藥妝為目前前三大銷售通路。

依據 2019 年 Euromonitor international 市調公司數據資料，本研究推估 2019 年越南保健營養食品市場規模約達 4,984 百萬美元(約 50 億美元)詳如**圖 9**，產品範疇包括營養強化/機能食品(67.9%)、維生素及膳食補充品(約佔 13.3%)、體重控制食品(10.5%)、傳統草本膳食補充品(8.3%)及運動營養品(0.1%)，傳統食用型態如機能性飲料、優酪乳等營養強化/機能食品為市場主力，市場規模約達 3,384 百萬美元(約 34 億美元)，就現況而言，根據與台灣業者合作的越南通路

商表示，越南當地直銷相當盛行，不僅知名直銷商安麗、賀寶芙等，還有很多當地小型直銷商，非上市公司之營業額也不容小覷，可能 Euromonitor International 市調公司無法掌握這些隱性小型直銷商的銷售資訊而低估實際的銷售額。因此，越南保健營養食品市場規模約 50 億美元僅為保守推估。

觀察近 6 年(2014 年~2019 年)詳如**圖 10** 越南各類保健營養食品市場規模(值)年平均成長率，以體重控制食品及運動營養食品成長最為顯著，分別有 16.7%及 39.0%之成長，係因越南注重健康的消費者日益將生活方式趨勢集中在健身及體能鍛煉上，為了改善外表及體態使人們對運動營養及體重管理相關產品產生了需求，使得此 2 個類別成長最為顯著，尤其在 2019 年的增長最快。此外，越南的體育館數量預估將從 2018 年的 3399 個增加到 2023 年的 6882 個。體育館數量的增加將成為包含保健營養食品在內之健康保健品消費支出增長的主要推動力。

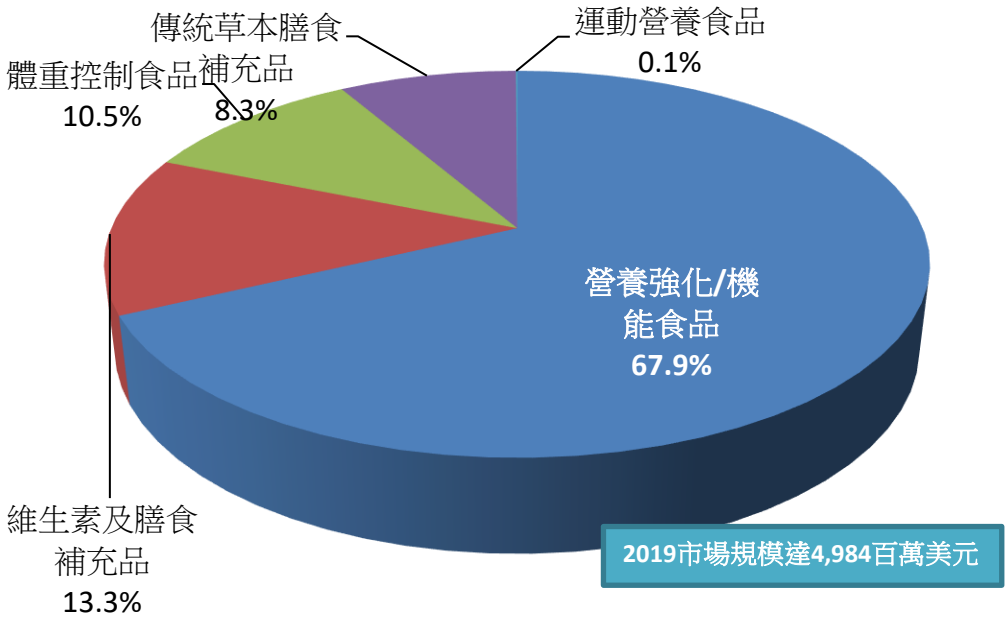


圖 9、2019 年越南保健營養食品市場規模

資料來源: Euromonitor International 市調公司(2019);穀研所彙整

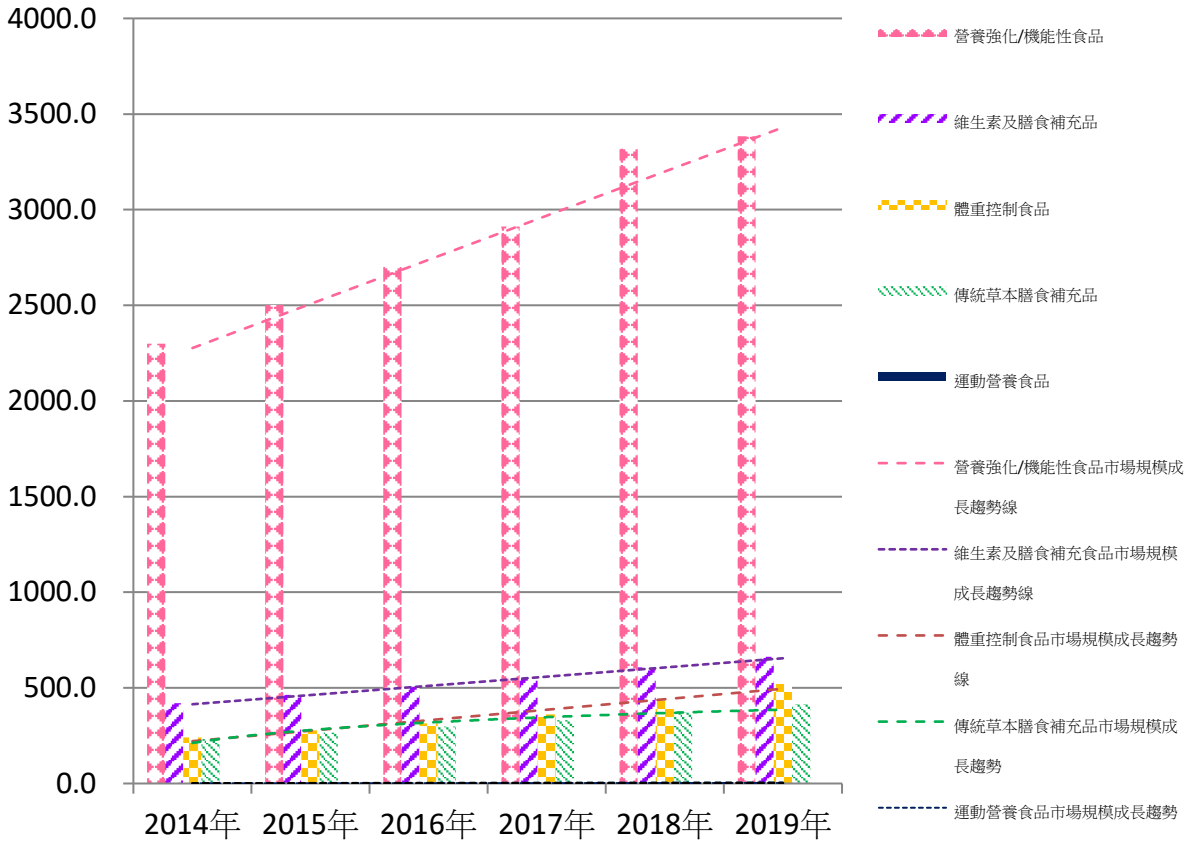


圖 10、2014~2019 年越南保健營養食品市場規模

資料來源: Euromonitor International 市調公司(2019);穀研所彙整

綜觀而論，未來越南保健營養食品市場消費趨勢如下:

- 健康是越南人首要關心之議題，消費者對保健營養食品之需求增加。
- 越南保健營養食品產業面臨高度競爭壓力。
- 隨著人們的可支配收入增加，不斷增長的中產階級崛起，提高了保健營養食品消費支出。
- 越南消費者對天然、潔淨、植物性和環保食品的需求不斷增長，有不少越南消費者深信草本植物的療效。
- 越南消費者日益瞭解飲食習慣 、 營養 、健康三者的連帶關係。
- 越南消費者特別喜歡進口保健營養食品或乳製品，此外，越南消費者已從巴氏德殺菌牛奶轉向植物性牛奶(例如黑芝麻奶，豆奶、核桃奶、米漿等)。

二、越南保健營養食品之保健定位/健康訴求分析

隨著越南消費者健康意識逐漸抬頭，消費者不僅變得更加了解他們可以使用的各種產品來增進健康並意識到產品益處，尤其是對膳食補充品的需求持續增長，這是因為活躍於社交圈之年輕消費者以及越南老齡化人口積極地尋求產品來支持其從記憶、皮膚到心臟健康等各方面的健康。使得整個越南醫療保健市場日益蓬勃發展，吸引製造商及外國投資者投入產品之製造及銷售。

維生素及膳食補充品為越南主要保健營養食品消費類別之一，據 Euromonitor international 市調公司於 2019 年之調查指出，以銷售狀況來看，維生素及膳食補充品前三大項銷售主力品項之保健定位/健康訴求分別為維持一般健康(39.7%)、美容(18.4%)及改善記憶力(15.7%)(詳如**圖 11**)，本研究推估 2019 年維生素及膳食補充品市場規模約達 6.6 億美元。然而，近年來有很多假冒和不符合衛生安全法規之維生素及膳食補充品在越南許多銷售通路（尤其是通過互聯網零售商進行廣告宣傳和銷售）持續氾濫中，越南衛生部正在採用更嚴格的法規來管理膳食補充品，政府對違反法規要求的行為處以嚴厲的罰款，儘管為改善這些產品的質量和安全性而採取的新措施必將使消費者受益，但它將使得規模較小的業者考慮其他問題較小的醫療保健產品的類別發展，因此，預估維生素及膳食補充品這類產品未來的市場值成長率將會放緩。

此外，隨著經濟高度發展，越南因工業及商業化發展導致的空氣污染問題幾乎沒有改善、越南人工作相關的壓力及社會壓力逐漸增加，對於緩解壓力、相關頭痛、腸胃道消化、睡眠障礙等之藥物需求有增無減，因此，對增強健康產品例如草藥/傳統膳食補品的興趣不斷上升，應該會為越南的消費者醫療保健帶來更強勁的價值增長，值得注意的是，越南消費者更傾向選擇草藥/傳統產品，而不是合成產品，這種考量亦將原本對藥品之需求轉嫁到對天然保健營養食品或漢方草本食品的食用選擇上。本研究推估越南 2019 年傳統草本膳食補充品市場規模約達 4.1 億美元，這類產品約有一半以上之訴求為維持一般健康。

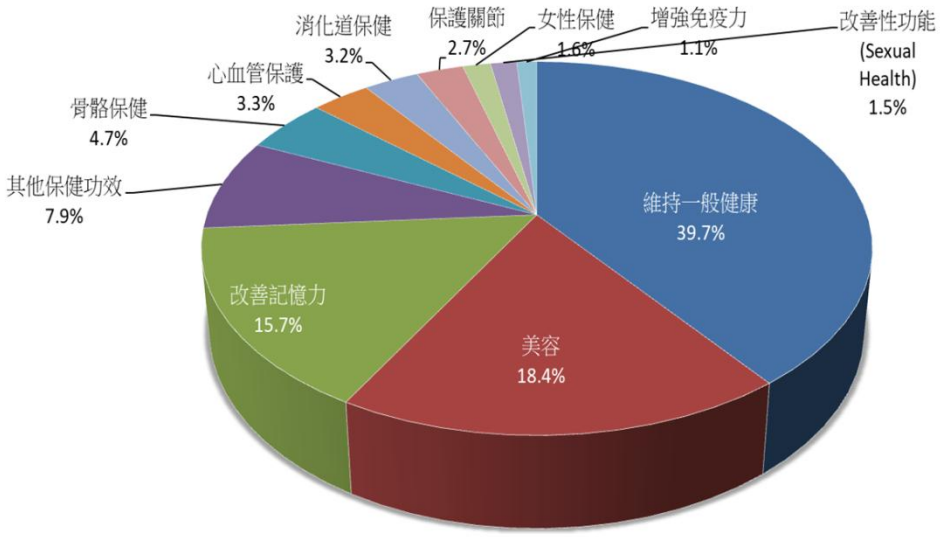


圖 11、維生素及膳食補充品之保健定位/健康訴求分佈

資料來源: Euromonitor International 市調公司(2019);穀研所彙整

三、越南保健營養食品品牌分析

越南傳統型食用型態之營養強化/機能性食品之品牌競爭集中度通常較高，在機能性飲品之品牌競爭方面，Vietnam Dairy Products JSC (Vinamilk)及 Royal FrieslandCampina NV 此前兩名參與者旗下產品品牌營業額佔據了該行業收入一半以上，其品牌競爭高度集中，其中 Vietnam Dairy Products JSC 公司販售許多機能性牛奶，尤其是 Sure Prevent 產品含植物甾醇酯的產品，訴求可降低膽固醇，受到市場歡迎，在機能性食品之品牌競爭方面，前五名參與者包括 TC Pharmaceutical Industry Co Ltd， PepsiCo Inc，Nestlé SA， Masan Group Corp 及 Tan Hiep Phat Group 等公司，此 5 家公司旗下產品品牌營業額佔據了該行業收入佔據了該行業收入的四分之三以上。未來越南之營養強化/機能性食品將朝五大趨勢方發展，其一、添加機能性成份包括維生素 A、維生素 C、維生素 D 及 omega-3 脂肪酸、益生菌等之飲料;其二、訴求能強化免疫機能者;其三、原料為天然來源;其四、產品之品質及安全性高;其五、組成營養價值高。

有別於營養強化/機能性食品之品牌競爭狀態，非傳統食用型態的

膳食補充品之品牌競爭狀態高度分散，前十名的參與包括者句括 Herbalife Nutrition Ltd、Abbott Laboratories Inc、Traphaco JSC、Nu Skin Enterprises Inc 、 GlaxoSmithKline Plc 、 Amway Corp 、 Taisho Pharmaceutical Holdings Co Ltd 等公司其下品牌產品營業額不到該行業收入一半(詳如**表 4**)，市場主要由外國公司主導，並且高度依賴進口，這也顯見，一般越南消費者對該類產品品牌忠誠度多不高，進口產品仍有較大市場空間，唯品牌競爭壓力亦不小。

表 4、越南前 15 大保健營養食品主力品牌

名次	品牌名稱	品牌擁有者	2019市場值(單位:百萬美元)	2019市場值(單位:美元)
1	Herbalife Nutrition	Herbalife Nutrition Ltd	12.9	12914576.49
2	Ensure	Abbott Laboratories Inc	12.3	12339062.78
3	Traphaco	Traphaco JSC	3.2	3186647.327
4	Pharmanex	Nu Skin Enterprises Inc	2.8	2798815.706
5	Panadol	GlaxoSmithKline Plc	2.4	2436006.273
6	Nutrilite	Amway Corp	2.0	2033892.413
7	Hapacol	Taisho Pharmaceutical Holdings Co Ltd	1.8	1750497.994
8	Efferalgan	Taisho Pharmaceutical Holdings Co Ltd	1.7	1658586.202
9	DHG products	Taisho Pharmaceutical Holdings Co Ltd	1.4	1413784.442
10	Tiens	Tiens Group Co Ltd	1.2	1224165.18
11	Rohto	Rohto Pharmaceutical Co Ltd	1.2	1222126.494
12	Glucerna	Abbott Laboratories Inc	1.2	1219673.173
13	Cheong-Kwan-Jang	KT&G Corp	1.1	1073899.257
14	Salangane's Nest	Khanh Hoa Pharmaceutical JSC	1.0	1024303.193
15	Homtamin	Korea United Pharmaceutical Inc	1.0	968182.8972

資料來源:Euromonitor international(2019)

**註:1.本保健營養食品推估範圍不包括營養強化/機能食品

玖、越南保健營養食品目標市場外銷策略建議

一、法規面策略建議

1.掌握越南食品(含保健營養食品)相關管理法規動態，以降低非關稅障礙，提高產品外銷市場時效性

越南保健營養食品法規管理規範日益完整，且越南食品管理局(VFA)，對於保健營養食品的監管日趨嚴格，國內業者若想拓展越南市場，需熟知越南食品(含保健營養食品)相關管理法規特別是進口保健營養食品申請產品宣告註冊許可證所需提交之相關資料、產品標示、產品健康宣稱、產品衛生標準等管理法規。另建議有意外銷越南之業者取得國內健營養食品 GMP 認證，與當地法規接軌，

有助於膳食補充品之外銷。

2.強化自家產品的安全及功效性驗證，朝人體臨床驗證及國際期刊發表努力

在越南食品若要進行健康宣稱，需先提供該食品非常充足的人體臨床試驗/干預性研究(intervention study)驗證相關的科學證據文獻給越南食品管理局審核，以支持食品或成分與健康宣稱之關聯性，因此，建議欲拓展越南保健營養食品目標市場的業者應強化自家產品的安全及功效性驗證，應與國內外研究機構合作，朝人體臨床驗證及國際期刊發表努力。

二、市場面策略建議

1.整體而言，針對越南保健營養食品市場之開發初部可鎖定調節血月脂、調節血壓、調節血糖，此外，營養補充維持健康狀態、增強免疫力、支氣管保護、護腎、護肝、增強記憶力、產品亦是可先著手開發的品項

從相關的越南民眾健康調查(含十大死因)的結果指出，中風及冠心病一直位居越南十大死因前二名，也因為經濟的快速發展，環境污染日趨、飲食及生活型態改變，糖尿病、肺癌、慢性腎病、肝病、失智人口逐年攀升，可因應此需求開發符合代謝症候群及有肥胖及心血管問題之人群所需的保健營養食品，此外，營養補充維持健康狀態、增強免疫力、支氣管保護、護腎、護肝、增強記憶力、產品亦是可先著手開發的品項。

成份來源天然如天然草本素材、高膳食纖維兼具營養及健康機能性食品會較受到一般越南消費者的青睞。此外，崇尚潔淨及環保亦是越南消費趨勢之一，產品申請潔淨或綠色食物章都有助於市場拓展。透過親朋好友的推薦、醫生藥師專業者人士之推薦電視媒體的促銷及產品品質及效益解說等方式有利於產品銷售。

2. 可鎖定越南青壯年消費群，進行護膚美容、骨質保健及護肝保健訴求相關產品開發，尋求市場機會

據調查越南年齡中位數為 32.5 歲，而 25-54 歲青壯年消費人

口約佔總人口數的 46%，鎖定此保健營養食品消費主力客群，佈局該市場宜先從其最關注的前三種保健訴求包括護膚美容、骨質保健(含增高保健)及護肝相關產品作為進入該市場之利基產品。此外，在功效訴求上，針對男性客群可強調「保肝提神」，而針對女性客群則以「骨質及健康美麗促進」為主。

3. 朝深耕品牌行銷努力，尋求越南當地信譽良好行銷公司合作機會

越南保健營養食品市場充斥著“假貨混亂”的情況，使消費者時刻保持警覺，謹慎選擇。製造商和分銷商需要建立客戶品牌知名度、信任和忠誠度才能生存和發展，因此，建議有意開拓越南保健營養食品市場之台廠需有建議做好長期投入當地市場及品牌經營之準備。或者與當地具有知名度的品牌商合作，由於越南食品標示必需完整標示負責廠商及製造商之名稱及地址，與當地具有信譽之行銷商合作，將有利 MIT 產品之推廣，以及國外業者來台尋求合作。

4.研擬最適保健營養食品價格策略以擴大越南消費族群

越南人均 GDP 約為 6900USD(年薪約 20 萬 NTD)，相較於鄰近各國包括台灣、新加坡及馬來西亞來的低，因此，可支配所得及消費力來得低，但預期未來 5 年 GDP 成長率都將較台灣、新加坡及馬來西亞等來得高，保健營養食品市場也較具發展潛力，因此，建議業者研擬最適保健營養食品價格策略以佈局潛力越南保健營養食品市場，多數越南消費者每次花費在保健營養食品約為 10~25USD(300~750NTD)，可依此作為產品定價之參考，亦可思考將產品分裝為小包裝，降低產品客單價，以吸引越南消費者購買。

5.建議在產品標示語言上以英文方式標示:

因為大陸食安事件頻傳，以及近來中國與越南有南海主權爭議問題，衍生 2014 年越南排華暴動，大多數越南人不喜歡也不信任中國製產品，較崇尚歐美洋品牌，建議國產保健營養食品以英文包裝出口越南(不要標示中文或漢字)，僅有特定法規強制項目例如需以越南文清楚標示「保健營養食品(health foods /functional foods)」、「此食品並非藥品，不能取代藥品」等資訊，需製作成越南文標籤

貼在外包裝盒。

6.依產品型態之不同鎖定不同通路進行通路佈局

傳統食用型態之機能性食品/補充食品銷售通路可鎖定超市、量販店及量販店進行通路佈局。而膠囊、錠狀型態之膳食補充品、維生素產品則可鎖定在直銷通路及其他有醫學、藥學或營養學專業背景的銷售人員之實體通路，如藥局、進藥妝店行銷販售，此外，近年來，網路電商通路的崛起，加上近年來，越南在網路及智慧手機普及之後，後疫情時代，網路購物是極具潛力的保健營養食品銷售通路，不容小覷，業者應趁早佈局。

附錄

附錄一

MINISTRY OF HEALTH

SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom - Happiness

No:43/2014/TT-BYT

Hanoi, November 24, 2014

CIRCULAR

REGULATING THE MANAGEMENT OF FUNCTIONAL FOODS

Pursuant to the Law of Food safety dated June 17, 2010;

Pursuant to the Government's Decree No. 38/2012/ND-CP dated April 25, 2012, detailing the implementation of some articles of the Law of Food safety;

Pursuant to the Government's Decree No. 63/2012/NĐ-CP dated August 31, 2012 defining the functions, tasks, powers and organizational structure of the Ministry of Health.

At the request of the Director of Vietnam Food Administration;

The Minister of Health promulgates the Circular regulating the management of functional foods.

Chapter I

GENERAL PROVISIONS

Article 1. Scope

1. This Circular regulates the activities related to production, trading, product announcement, labeling and giving instructions on functional foods including supplemented foods, health protection foods, medical foods and foods used for special dietary uses.

2. This Circular does not apply to nutritional formula for children. The production, trading, product announcement, labeling and giving instructions for this product shall be implemented

in accordance with corresponding technical regulations and the laws on trading and using nutritional products for children.

Article 2. Interpretations of terms

In this Circular, the following terms are construed as follows:

1. *Supplemented Food* means ordinary food supplemented with micronutrients and other elements conducive to health such as vitamins, minerals, amino acids, fatty acids, enzymes, probiotics, prebiotics and other biologically active substances.

2. *Health Supplement, Food Supplement, Dietary Supplement* means product made in the form of capsules, pellets, tablets, glues, granules, powder, liquid and other processed forms containing one or combination of the following substances:

a) Vitamins, minerals, amino acids, fatty acids, enzymes, probiotics and other biologically active substances;

b) Active ingredients naturally derived from animals, minerals, and plants through extraction, isolation, concentration, and metabolism processes.

3. *Food for Special Medical Purposes or Medical Food* means food administered orally or with feeding tubes which are designated to regulate the patient's diet and are only used under the supervision of health workers.

4. *Food for Special Dietary Uses* for dieters, the elderly and other special users prescribed by The Codex Alimentarius *C*ommission (CODEX) means food processed or blended according to special formulae to meet the requirements of particular diets suitable for certain physical or medical conditions and disorders of users. The composition of this food is distinctly different from that of other ordinary foods having the same nature, if any.

5. *Scientific evidence* means scientific information and documentation from scientific research conducted by competent State management agencies on scientific research or accepted by domestic or foreign academic journals or documentation of traditional medicine, herbs, and herbal ingredients published in scientific publications.

6. *Recommended Nutrition Intakes for Vietnamese* means recommended nutrient intakes that an ordinary Vietnamese person needs announced by National Institute of Nutrition (the Ministry of Health).

Chapter II

GENERAL REQUIREMENTS FOR FUNCTIONAL FOODS

Article 3. Declaration of conformity and declaration of compliance to food safety regulations

1. There must be a declaration of conformity and registration of declaration of conformity at the Ministry of Health (Vietnam Food Administration) for imported and domestically produced functional foods that are regulated by technical regulations before they are put on the market.

2. There must be a declaration of compliance to food safety regulations and registration of declaration of compliance to food safety regulations at the Ministry of Health (Vietnam Food Administration) for imported and domestically produced functional foods that are not regulated by any technical regulations before they are put on the market.

3. Procedures, application for registration of declaration of conformity and declaration of compliance to food safety regulations for imported and domestically produced functional foods are defined in Article 6, Article 7 of the Government's Decree No. 38/2012/NĐ-CP dated April 25, 2012, detailing the implementation of some articles of the Law of Food safety and Article 4, 5, 7, 9 of the Circular No. 19/2012/TT-BYT dated November 09, 2012 of the Minister of Health guiding the Declaration of conformity and declaration of compliance to food safety regulations.

Article 4. Report on effect testing results

1. The following products must be tested for effects on human health:

a) The products with claimed therapeutic effects (i.e. to aid in treatment of diseases);

b) The products having new effects which have not been recognized by other countries;

c) The products having new active ingredients which have not been permitted;

d) Health supplements put on the market for the first time which have different formulae from those of other products having scientific evidence.

dd) The products derived from plants, animals and put on the market for the first time, the composition of which is different from that of the traditional medicines published in academic journals.

e) Medical foods and foods for special dietary uses which have not been permitted by competent authorities or authorized agencies or law of the country of origin, or the effects, suitable users and usage on the label have not been confirmed by the exporting country.

2. The test for effects on human health must be conducted at the organizations licensed to do scientific research in medicine. The products with claimed therapeutic effects must be tested at the provincial hospitals (or above) licensed to do scientific research.

3. If the test for the effects on human health is conducted overseas, it must be performed by agencies accredited by competent authorities of home country or test results are published in academic journals.

4. Food Administration (the Ministry of Health) shall establish the Scientific Council which consists of experts in appropriate fields to assess the reports on the product's effects and scientific evidence announced.

The organizational structure and operation of Scientific Council shall comply with the provisions of law.

Article 5. Testing

The test of functional foods serving declaration of compliance to food safety regulations and periodic testing shall comply with the provisions the Circular No. 19/2012/TT-BYT dated November 09, 2012 of the Minister of Health, which provides guidelines for Declaration of conformity and declaration of compliance to food safety regulations and the following provisions:

1. If active ingredients creating the main effects can be tested by Vietnamese units, the amounts of active ingredients in the products shall be determined.

2. With regard to active ingredients which do not have testing method or standard sample to be quantified by domestic agencies, the amount of substances that contain the main active ingredients shall be specified in the declaration document.

Article 6. Labeling functional foods

Besides complying with regulations on labeling packaged foods with the name, the composition and the mandatory label contents defined in Chapter II on regulations on labeling of joint Circular No. 34/2014/TTLT-BYT-BNNPTNT-BCT dated October 27, 2014 by the Minister of Health, the Ministry of Agriculture and Rural development, the Ministry of Industry and Trade on labeling of packaged foods, food additives and food processing aids, labeling functional foods for each specific food groups must also comply with the provisions of Articles 9, 11 and 13 of this Circular and the following provisions:

1. Warning of risks, if any.

2. The name of the product and the information on the label must be consistent with the claims and materials attached to the declaration document.

Article 7. Advertising functional foods

1. Advertisements for functional foods must comply with regulations of law on advertising.

2. There must be the notice: “This product is not a medicine, and is not a substitute for medicines" in every advertisement for health supplements on audio-visual media; letters, words must be easy to read and hear in normal conditions.

Chapter III

REQUIREMENTS FOR FUNCTIONAL FOODS

Article 8. Requirements for claims

1. Nutrient content claims:

When supplementing foods with vitamins, minerals, amino acids, fatty acids, enzymes, probiotics, prebiotics and other biologically active substances, the claims about the contents of such substances in foods according to recommended nutrition intakes (RNI) for Vietnamese are specified in Appendix No. 01 issued together with this Circular as follows:

a) A substance shall not be mentioned if its content is below 10% RNI;

b) If the content of a substance is from 10% RNI, its content in a serving or 100g of the product shall be specified;

c) The maximum contents of vitamins, minerals in the foods according to recommended nutrition intakes provided by manufacturers shall not exceed the permissible maximum contents of vitamins and minerals in functional foods defined in Appendix 02 issued together with this Circular.

The maximum contents shall comply with regulations of CODEX or relevant international organizations if there is no RNI in Vietnam.

2. Health claims:

a) Health claims about a supplementary substance shall be made only when its content in the product reaches 10% RNI or above and is proven with specific scientific evidence.

b) For supplementary ingredients without RNI, health claims shall be made on the label only when they are proven with the scientific evidence or contents of such ingredients are conformable with recommendations on published scientific documents.

c) Health claims must be clear, consistent, and suitable for the suitable users and dosage.

Article 9. Requirements for Vietnamese labels

Labels of supplement foods must comply with the provisions in Article 6 of this Circular and the following provisions:

1. On the main part of the label, there must be a phrase expressing the food group as “Supplement foods” or the heading name in a national technical regulation.

2. The users to which RNI apply or conformable with scientific evidence of the recommended dose (if no RNI are available) must be specified.

Chapter IV

HEALTH SUPPLEMENTS

Article 10. Claim contents

1. Nutrient content claims:

a) The main ingredients that create the effects of the product must be enumerated first together with their full names and contents. The other ingredients shall be enumerated next and sorted by weight in descending order;

c) The contents of vitamins, minerals in the foods in recommended nutrition intakes provided by manufacturers shall be at least 15% RNI specified in Appendix 01 issued together with this Circular.

c) The maximum contents of vitamins, minerals in the foods in recommended nutrition intakes provided by manufacturers shall not exceed the permissible maximum contents of vitamins and minerals in functional foods defined in Appendix 02 issued together with this Circular.

d) Vitamin and mineral contents in the product must be written on the label in number and percentage (%) of RNI according to recommended nutrition intakes of the product or based in a serving size.

In case Vietnam does not have RNI, provisions of CODEX or relevant international organizations shall apply.

2. Health claims:

a) Health claims must reflect the product nature, the claim about effects of ingredients having main or combined effects shall be made only when there is scientific evidence, the effects of ingredients must not be enumerated as effects of the product;

b) Claims about health, dosage, suitable users and suitable usage must be consistent and in conformity with the documents;

c) The effects of the vitamins, minerals and active ingredients of which the contents are smaller than those in the scientific documents shall not be claimed;

c) The effects of vitamins, minerals and active ingredients of which the contents are the same as those in the scientific documents shall be claimed, provided suitable users and doses are specified;

dd) Scientific evidence of effects of ingredients and recommended intakes must be provided if such ingredients do not have RNI.

3. Users:

Article 3. The suitable users must be consistent with claimed effects and approved by competent State agencies with written declaration of compliance to food safety regulations;

b) Prohibited users (if any) must be specified.

Article 11. Vietnamese labels

Labels of health supplements must comply with the provisions in Article 6 of this Circular and the following provisions:

1. On main part of the label, there must be a phrase expressing the food group as “Health supplement” to distinguish ordinary foods from medicines.

2. When using the main ingredient that create the product effects as the product name, the following information must be written next to or below the product name on the main part and the ingredient sheet of the label:

a) Contents of active ingredient in such main ingredient if they can be determined;

a) Content of the main ingredient if the active ingredient contents cannot be determined;

3. Pharmacokinetics of the product shall not be written on the label.

4. There must be a phrase: “Attention: This product is not a medicine, and is not a substitute for medicines” right after the product’s effects or with other recommendations (if any). This phrase must have a contrasting color to the background color of the label and the letters must be at leapt 1.2 millimeters. The letters must be at least 0.9 millimeters if one side of the package is smaller than 80 square centimeters.

Chapter V

MEDICAL FOODS AND FOODS FOR SPECIAL DIETARY USES

Article 12. Claim contents

1. Nutrient content claims:

a) The ingredients of the food must be sorted by weight in descending order;

b) RNI of vitamins and minerals in a serving or their contents in 100g product must be specified;

c) The maximum contents of vitamins, minerals in the foods according to recommended nutrition intakes provided by manufacturers shall not exceed the permissible maximum contents of vitamins and minerals in functional foods defined in Appendix 02 issued together with this Circular.

In case Vietnam does not have corresponding RNI, provisions of CODEX or relevant international organizations shall apply.

2. Health claims:

The health claims must specify the RNI applied to various users.

3. Users:

The health claim must specify the suitable users and prohibited users.

4. Dosage:

The dose for specific users for a period of time must be specified.

Article 13. Vietnamese labels

Labeling medical foods and foods for special dietary uses must comply with the provisions in Article 6 of this Circular and the following provisions:

1. On the main side of the label, there must be a phrase expressing food group as “medical foods” to distinguish ordinary foods from medical foods and the sentence: “used under the supervision of health workers”.

2. In main side of the label, there must be a phrase expressing the food group as “dietary products (for specific users)” to distinguish ordinary foods from foods for special dietary uses.

3. There must be a detailed guidance on cleaning and preparation to ensure hygiene, food safety and proper nutrition suitable for health conditions of the users.

4. Requirements for giving instructions:

a) The instructions provided in the declaration document must be clear and detailed;

b) Prohibited users (if any) must be specified.

Chapter VI

CONDITIONS FOR PRODUCTION, TRADING AND GIVING INSTRUCTIONS FOR FUNCTIONAL FOODS

Article 14. Conditions for producing functional foods

1. Facilities, equipment, tools, materials, packages and the direct producer are defined in Article 3 of the Circular No. 16/2012/TT-BYT dated October 22, 2012 of the Minister of Health regulating food safety conditions applied to manufacturers and sellers of foods, instruments and materials for wrapping and storing food under the management of the Ministry of Health.

2. Any pharmaceutical manufacturer that has obtained the Certificate of Good Manufacturing Practices (GMP) in producing functional foods shall be exempt from obtainment of the Certificate of Food safety.

3. Pharmaceutical manufacturers must adhere to the mandatory roadmap for Good Manufacturing Practices (GMP) and Hazard Analysis and Critical Control Points (HACCP) under provisions of the Minister of Health.

Article 15. Conditions for trading, preserving and transporting functional foods

1. Facilities, equipment, tools, materials and the direct producer are defined in Article 4, 5 and 6 of the Circular No. 16/2012/TT-BYT dated October 22, 2012 of the Minister of Health regulating food safety conditions applicable to the facilities that produce and trade foods, instruments and materials for wrapping and storing food under the management of the Ministry of Health.

2. Health supplements must be sold separately from the areas of other foods. There must be a separate area in the pharmacy where functional foods are sold.

Chapter VII

RECALLING AND DISPOSING UNSAFE FUNCTIONAL FOODS

Article 16. Recalling functional foods

1. Functional foods must be recalled in the following cases:

a) The products have expired;

The products are not conformable with the Ministry of Health's technical standards or regulations on food safety.

c) The information on the products sold on the market is inconsistent with the claims confirmed by the agency granting the Certificate of Declaration of conformity or inconsistent with the Certificate of Declaration of conformity with the food safety regulations or violate other laws;

d) The products are sold on the market without conformity certification or confirmation of satisfying food safety regulations;

dd) There is a safety warning of the product from competent authorities of the countries or international organizations and confirmation from Vietnam Food Administration- the Ministry of Health

2. Individuals, organizations producing and trading functional foods shall recall unsafe products and submit reports to Vietnam Food Administration - the Ministry of Health.

Article 17. Disposing unsafe functional foods

Manufacturers and sellers of unsafe functional foods shall dispose those products and bear all the recall and disposal costs.

Article 18. Tracing the origins of violations

1. Origins tracing shall be carried out at the final packaging place. Manufacturers and sellers of functional foods have a responsibility to provide sufficient information about the origin, quality, material safety, manufacturing process, processing, preserving to the competent State management agencies during inspection.

2. Origins of materials threatening food safety shall be investigated at the facilities considered origins of such materials in order to identify the supplier of such materials or the area where such materials are produced.

Chapter VIII

IMPLEMENTATION

Article 19. Effect

This Circular takes effect on January 15, 2015 and replaces Circular No. 08/2004/TT-BYT dated August 23, 2004 of the Minister of Health on management of functional foods.

Article 20. Transition

Any functional food granted the Certificate of Declaration of conformity or Certificate of Declaration of compliance with the food safety regulations before the effective date of this Circular shall be still effective until the expiry of the Certificate of Declaration of conformity or Certificate of declaration of compliance to food safety regulations

Article 21. Implementation

1. Vietnam Food Administration - the Ministry of Health shall take charge and cooperate with functional agencies of The Ministry of Industry and Trade, the Ministry of Public Security under competence to plan, direct, inspect and supervise the implementation of this Circular.

2. The Department of Health of provinces shall implement, direct the Branch of food safety and hygiene and relevant agencies to inspect local manufacturing and trading affiliates of functional foods.

3. Agencies, organizations, and having the effectiveness of the use of human health tested shall bear all the cost of testing in accordance with current regulations.

4. Manufacturing and trading establishments of functional foods shall implement the provisions of this Circular.

Difficulties that arise during the implementation of this Circular should be reported to the Ministry of Health (Vietnam Food Administration) for consideration./.

PP.MINISTER
VICE DEPUTY MINISTER

Nguyen Thanh Long

APPENDIX 01

TABLE OF RECOMMENDED NUTRITION INTAKES FOR VIETNAMESE
(Enclosed with the Circular No. *43/2014/TT-BYT dated November 24, 2014 by the Minister of Health)*

1. Recommended intakes of minerals and micronutrients

Age and gender	Ca (Calcium) (mg/day)	Mg (Magnesium) (mg/day)	P (Phosphorus) (mg/day)	Selenium * (mg/day)
Infants				
< 6 months old	300	36	90	6
6-11 months old	400	54	275	10
Children				
1-3 years old	500	65	460	17
4-6 years old	600	76	500	22

7-9 years old	700	100	500	21
Adolescents (male)				
10-12 years old	1,000	155	1,250	32
13-15 years old		225		
16-18 years old		260		
Adults (male)				
19-49 years old	700	205	700	34
50-60 years old	1,000			
> 60 years old				33
Adolescents (female)				
10-12 years old (under the age of menstruation)	1,000	160	1,250	26
10-12 years old				
13-15 years old		220		
16-18 years old		240		
Adults (female)				
19-49 years old	700	205	700	26
50-60 years old	1,000			

60 years old				25
Pregnant women				
3 first months	1,000	205	700	26
3 next months				28
3 last months				30
Breastfeeding women	1,000	250	700	
6 first months				35
6 last months				42

* Recommended nutrition intakes are determined according to the average intakes +2 SD

2. Recommended intakes of iodine, iron and zinc

Age	Iodine (mg/day)	Iron (mg/day) according to biological value			Zinc (mg/day)		
		5%[1]	10%[2]	15%[3]	High absorption	Average absorption	Poor absorption
Infants							
0-6 months old	90	0.93			1.1[5]	2.8[6]	6.5[7]
6-11 months old	90	18.6	12.4	9.3	0.8-2.5[8]	4.1[8]	8.3[8]
Children							
1-3 years old	90	11.6	7.7	5.8	2.4	4.1	8.4

4-6 years old	90	12.6	8.4	6.3	3.1	5.1	10.3
7-9 years old	90	17.8	11.9	8.9	3.3	5.6	11.3
Adolescents (male)							
10-14 years old	120	29.2	19.5	14.6	5.7	9.7	19.2
15-18 years old	150	37.6	25.1	18.8	5.7	9.7	19.2
Adolescents (female)							
10-14 years old	120	28.0	18.7	14.0	4.6	7.8	15.5
15-18 years old	150	65.4	43.6	32.7	4.6	7.8	15.5
Adults							
Male, ≥ 19 years old	150	27.4	18.3	13.7	4.2	7.0	14.0
Female, ≥ 19 years old	150	58.8	39.2	29.4	3.0	4.9	9.8
Middle-aged people (≥ 50 years old)							
Male					3.0	4.9	9.8
Female		22.6	15.1	11.3	3.0	4.9	9.8
Pregnant women	200	+30.0[4]	+20.0[4]	+15.0[4]			
Breastfeeding women	200						

[1] Serving size with low biological value of iron (about 5% of iron is absorbed): simple and monotonous regimen, containing under 30g of meat and/or fish per day or under 25 mg of vitamin C per day.

[2] Serving size with average biological value of iron (about 10% of iron is absorbed): containing 30g – 90g of meat and/or fish per day or 25 mg – 75 mg of vitamin C per day.

[3] Serving size with high biological value of iron (about 15% of iron is absorbed): containing over 90g of meat and/or fish per day or over 75 mg of vitamin C per day.

[4] Pregnant women are recommended to take iron pills during the gestation. A higher dose shall be given if they have anaemia.

[5] Breast-fed children

[6] Children fed by formula milk

[7] Children fed by formula milk with great amount plant-based protein and phytates.

[8] Excluding purely breast-fed children

[8] High absorption: high biological value of zinc, equal to 50% (serving contains a lot of protein from animal or fish derivatives); average absorption: average biological value of zinc, equal to 30% (serving contains an average amount of protein from animal or fish derivatives; ratio of phytate and zinc is at 5:15); low absorption: low biological value of zinc, equal to 15% (serving contains very little or does not contain protein from animal or fish derivatives).

3. Recommended daily intakes of vitamins

Age and gender	A mcg[a]	D mcg[c]	E mg[d]	K mcg	C mg[b]	B_1 mg	B_2 mg	B_3 mg NE[e]	B_6 mg	B_9 mcg[f]	B_{12} mcg
Infants and children											
< 6 months old	375	5	3	6	25	0.2	0.3	2	0.1	80	0.3
6-11 months old	400	5	4	9	30	0.3	0.4	4	0.3	80	0.4
1-3 years old	400	5	5	13	30	0.5	0.5	6	0.5	160	0.9

4-6 years old	450	5	6	19	30	0.6	0.6	8	0.6	200	1.2
7-9 years old	500	5	7	24	35	0.9	0.9	12	1	300	1.8
Adolescents (male)											
10-12 years old	600	5	10	34	65	1.2	1.3	16	1.3	400	2.4
13-15 years old			12	50							
16-18 years old			13	58							
Adults (male)											
19-50 years old	600	10	12	59	70	1.2	1.3	16	1.3	400	2.4
51-60 years old		10							1.7		
≥60 years old		15									
Adolescents (female)											
10-12 years old	600	5	11	35	65	1.1	1	16	1.2	400	2.4
13-15 years old			12	49							
16-18 years old			12	50							
Adults (female)											
19-50 years old	500	10	12	51	70	1.2	1.1	14	1.3	400	2.4
51-60 years old		10				1.1			1.5		
> 60 years old	600	15			70	1.1					

Pregnant women	800	5	12	51	80	1.4	1.4	18	1.9	600	2.6
Breastfeeding women	850	5	18	51	95	1.5	1.6	17	2	500	2.8

[a] These following conversion factors may be used for vitamin A:

01 mcg of vitamin A or retinol = 01 retinol equivalent (RE)

01 IU (International unit) is equivalent to 0.3 mcg of vitamin A

01 mcg of b-carotene = 0.167 mcg of vitamin A

01 mcg of other carotenes = 0.084 mcg of vitamin A

[b] Excluding the loss during processing and cooking activities because Vitamin C is destroyed easily by the oxidization, light, alkali and temperature.

[c] These following conversion factors may be used for vitamin D:

01 IU is equivalent to 0.03 mcg of vitamin D3, or 01 mcg of vitamin D3 = 40 IU

[d] IU conversion factors (according to IOM-FNB 2000):
01 mg of a-tocopherol = 1 IU;
01 mg of b-tocopherol = 0.5 IU;
01 mg of g-tocopherol = 0.1 IU;
0.1 mg of s-tocopherol = 0.02 IU.

[e] Niacin or Niacin equivalent

[f] These following conversion factors may be used for Folic acid:

01 folic acid = 1 folate x 1.7, or 01 g of folic acid equivalent = 01 g of folate in food + (1.7 x amount of synthetic folic acid (in gram)).

Note: This table above will be updated according to current regulations of the Ministry of Health.

APPENDIX 02

MAXIMUM INTAKE LEVELS

(Enclosed with the Circular No. 43/2014/TT-BYT dated November 24, 2014 by the Minister of Health)

1. Vitamin

Age	Vitamin A (mg/ day)	Vitamin C (mg/ day)	Vitamin D (mg/ day)	Vitamin E (mg/ day)	Vitamin K (mg/ day)	Vitamin B1 (mg/ day)	Riboflavin (mg/ day)	Niacin (mg/ day)	Vitamin B6 (mg/ day)	Folic acid (mg/ day)	Vitamin B12 (mg/ day)	Pantothenic (mg/ day)	Biotin (mg/ day)
Infants													
0-6 months old	600	N/A	25	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6-12 months old	600	N/A	38	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Children													
1-3 years old	600	400	63	200	N/A	N/A	N/A	10	30	300	N/A	N/A	N/A
4-8 years old	900	650	75	300	N/A	N/A	N/A	15	40	400	N/A	N/A	N/A
Teenagers (9-13 years old)													
Male	1,700	1,200	100	600	N/A	N/A	N/A	20	60	600	N/A	N/A	N/A
Female	1,700	1,200	100	600	N/A	N/A	N/A	20	60	600	N/A	N/A	N/A
Adolescents (14-18 years old)													

Male	2,800	1,800	100	800	N/A	N/A	N/A	30	80	800	N/A	N/A	N/A
Female	2,800	1,800	100	800	N/A	N/A	N/A	30	80	800	N/A	N/A	N/A
Adults, ≥ 19 years old													
Male	3,000	2,000	100	1,000	N/A	N/A	N/A	35	100	1,000	N/A	N/A	N/A
Female	3,000	2,000	100	1,000	N/A	N/A	N/A	35	100	1,000	N/A	N/A	N/A
Old people, ≥ 51 years old													
Male	3,000	2,000	100	1,000	N/A	N/A	N/A	35	100	1,000	N/A	N/A	N/A
Female	3,000	2,000	100	1,000	N/A	N/A	N/A	35	100	1,000	N/A	N/A	N/A
Pregnant women	3,000	2,000	100	1,000	N/A	N/A	N/A	35	100	1,000	N/A	N/A	N/A
Breastfeeding women	3,000	2,000	100	1,000	N/A	N/A	N/A	35	100	1,000	N/A	N/A	N/A

2. Minerals

Age	Arsenic	Boron (mg/day)	Crom	Copper (mg/day)	Fluoride (mg/day)	Iodine (mg/day)	Iron (mg/day)	Magnesium (mg/day)	Manganese (mg/day)	Molybdenum (mg/day)	Nickel (mg/day)	Selenium (mg/day)	Zinc (mg/day)
Infants													

0-6 months old	N/A	N/A	N/A	N/A	0.7	N/A	40	N/A	N/A	N/A	N/A	45	4
6-12 months old	N/A	N/A	N/A	N/A	0.9	N/A	40	N/A	N/A	N/A	N/A	60	5
Children													
1-3 years old	N/A	3	N/A	1,000	1.3	200	40	65	2	300	0.2	90	7
4-8 years old	N/A	6	N/A	3,000	2.2	300	40	110	3	600	0.3	150	12
Teenagers (9-13 years old)													
Male	N/A	11	N/A	5,000	10	600	40	350	9	1,100	0.6	280	23
Female	N/A	11	N/A	5,000	10	600	40	350	9	1,100	0.6	280	23
Adolescents (14-18 years old)													
Male	N/A	17	N/A	8,000	10	900	45	350	11	1,700	1.0	400	34
Female	N/A	17	N/A	8,000	10	900	45	350	11	1,700	1.0	400	34
Adults, ≥ 19 years old													
Male	N/A	20	N/A	10,000	10	1,100	45	350	11	2,000	1.0	400	40
Female	N/A	20	N/A	10,000	10	1,100	45	350	11	2,000	1.0	400	40
Old people, ≥ 51 years old													

Male	N/A	20	N/A	10,000	10	1,100	45	350	11	2,000	1.0	400	40
Female	N/A	20	N/A	10,000	10	1 100	45	350	11	2,000	1.0	400	40
Pregnant women	N/A	20	N/A	10,000	10	1,100	45	350	11	2,000	1.0	400	40
Breastfeeding women	N/A	20	N/A	10,000	10	1,100	45	350	11	2,000	1.0	400	40

Maximum intake level means the maximum amount of a micronutrient that can be taken into the body without harm.

N/A: not enough information to determine the maximum intake level

Note: The table above will be updated according to current regulations of the Ministry of Health.

附錄二

MINISTRY OF HEALTH – MINISTRY OF AGRICULTURE AND RURAL DEVELOPMENT – MINISTRY OF INDUSTRY AND TRADE

SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom - Happiness

No.34/2014/TTLT-BYT-BNNPTNT-BCT

Hanoi, October 27, 2014

JOINT CIRCULAR

GUIDANCE ON THE LABELING OF GOODS FOR FOODS, FOOD ADDITIVES, AND PACKAGED FOOD PROCESSING AIDS

Pursuant to the Law on food safety dated June 17, 2010;

Pursuant to the Decree No.38/2012/NĐ-CP dated April 25, 2012 stipulating in details the execution of some articles of the Law on food safety;

Pursuant to the Decree No.89/2006/NĐ-CP dated August 30, 2006 by the Government on goods labels;

Pursuant to the Decree No.63/2012/NĐ-CP dated August 31, 2012 by the Government stipulating functions, duties, authorities and organizational structures of the Ministry of Health;

Pursuant to the Decree No. 199/2013/NĐ-CP dated November 26, 2013 by the Government stipulating functions, duties, authorities and organizational structures of the Ministry of Industry and Trade;

At the proposal by Director of Food Safety Department – Ministry of Health, Chief of Science and Technology Department – Ministry of Industry and Trade, Director of National

Agro- Forestry – Fisheries Quality Assurance Department – Ministry of Agriculture and Rural Development;

The Ministry of Health, Ministry of Agriculture and Rural Development, Ministry of Industry and Trade have issued the Joint Circular guiding labeling of goods for foods, food additives and packaged food processing aids,

Chapter I

GENERAL PROVISIONS

Article 1. Scope and regulated entities

1. This Joint circular stipulates the labeling of goods for processed foods, food additives and packaged food processing aids circulating in Vietnam (Hereinafter referred to as *the product*).

2. This Joint circular is not applied to genetically modified foods, preliminarily processed foods, fresh foods which are not sold directly to consumers and plainly packaged foods (unclosed packaging).

3. Labels of the products produced for export must ensure no deviation from true nature of the product, no violation of Vietnam law and the importers' law.

4. This Joint circular is applied to organizations, individuals as producers, traders and importers of processed foods, food additives and packaged food processing aids in Vietnam.

Article 2. Interpretation of terms

In this Joint circular, some terms are construed as follows:

1. *Product labels* mean handwritings, printouts, drawings, photocopies of letters, images being affixed, printed, molded, and inscribed directly on the product, product packages or on other materials attached to the product, product packages to show necessary information about that product.

a) *Main part of labels (*front part) means a part of the label that allows easiest and clearest view to consumers under normal display conditions, designed according to actual size of product and commercial packages;

b) *Remaining part of labels* means a part of the label where mandatory information and others are described. Back part of the label (side part) may be in close proximity, opposite, above or under front part of the label;

c) *Secondary label* is the label showing the information which is mandatory to be translated into Vietnamese from a foreign language and added with mandatory issues in Vietnamese which is missing in original label.

2. *Ingredients of the product* mean all substances, raw materials and additives used to produce foods and exist in finished products even if their forms have been changed.

3. Date of production, shelf-life

a) *Date of manufacture* means the time -mark when production, processing, assembling, bottling, packaging, or other forms are completed for final phase of the product.

b) *Shelf-life* means a period during which the product still remains its nutritional value and ensures safety under preservation conditions noted on the label according to instructions from the producer.

c) *Expiry date* means the time mark after which the product is not permitted to be sold on the market.

d) *Best before date* is a period during which the product still retains all of its inherent quality under preservation conditions noted on the label.

4. *Batch* means a defined quantity of a product type with the same name, quality, raw materials, shelf-life and being manufactured in the same facility under the same conditions.

Article 3. Requirements of the labeling of goods

1. Information or images, pictures, graphics and symbols on labels must be truthful and not cause confusion, misleading or deceptive, or create erroneous impressions regarding its character and effects in any respect.

2. It is prohibited to use wordings, symbols, and patterns that refer to or imply other products directly or indirectly and cause consumers to confuse the product with other products.

3. Minimum height of text of mandatory information on the label is 1.2 mm. In case one side of the package used for labeling (borders not taken into account) is below 80cm², the

minimum height of the text is 0.9 mm. Color of the letters must be in contrast to background color of labels.

4. Labels of goods must ensure lasting existence, no erasure and no effects on the product quality.

5. Organizations, individuals are encouraged to describe nutritional information in labels according to instructions by International Food Standards (Codex)

Article 4. Labeling language

1. Labels of products manufactured and sold on Vietnamese market must be written in Vietnamese and noted with adequate mandatory information as stipulated in this Joint circular. Depending on requirement of each product type, an alternative language may be used. Information in other languages must be corresponding to that in Vietnamese and letter size is not permitted to be larger than the information in Vietnamese.

2. Products imported for sale on Vietnamese market must be labeled as follows:

a) Mandatory information introduced into secondary labels must be made in Vietnamese attached with goods labels. Secondary labels must be attached to the product or packages and must not hide product information. Information noted on secondary labels must not cause misunderstanding to the information on the label;

b) Mandatory information on labels must be adequate and written in Vietnamese

Article 5. Information of product label

1. Information mandatory to be introduced into labels: product name; composition; product quantity; date of manufacture; shelf-life and preservation instructions; usage instruction; name and address of organizations, individuals taking responsibility for the product; origins; number of Certificate of Declaration of conformity or Certificate of Declaration of conformity with the food safety regulations; recommendations and warnings on food safety.

2. Other information of labels includes words, images, symbols, marks conveying different information.

Chapter II

REGULATIONS ON LABELING AND MANNER OF LABELING

Article 6. Product name

1. Product name applied on labels is initiated by food production and trading organizations, individuals themselves. Product name must ensure the following requirements:

a) The product name must not cause erroneous conception of nature, uses of foods, food additives and food processing aids; must not cause misunderstanding to consumers. The product name must be written on main part of labels.

b) The product name must conform to the name specified in Certificate of Declaration of conformity or Certificate of Declaration of conformity with the food safety regulations.

2. Name of imported product written on secondary labels must remain unchanged but name of goods category must be added and accompanied with a name in foreign language or phonetically transcribed into Vietnamese and must ensure compliance with Vietnamese law on goods labels.

3. In case a product consists of various types of the same category contained in the same commercial package, name of that product to be written shall follow name of goods category accompanied with manufacturer's trade mark or brand name of the product.

4. Product name can be accompanied with other supporting words on the label's main part in order to help consumers understand nature and natural conditions of the product exactly.

5. In case name of an ingredient of the product is used as product name or part of product name, that ingredient must be written with quantity next to product name at a position easily noticeable with naked eye or on the part of listed ingredients.

Article 7. Ingredients of product

1. All ingredients must be specified on product labels except the product made of only one ingredient.

2. For ingredients specified with descending order in quantity or percentage of each ingredient, the phrase "Ingredients" must be noted before the ingredients listed.

3. In case one ingredient of the product is a mixture which consists of two other ingredients and over, ingredients of that mixture must be described in parentheses and in descending order of quantity. In case the mixture accounts for smaller than 5% of the finished product's quantity, that mixture is not required to be published except food additives having technological functions for the finished product.

4. For foods containing one or some of the following ingredients, these ingredients must be published on labels;

a) Cereals and foods made from cereals containing gluten; i.e., wheat, rye, barley, oats, spelt or their hybrid varieties and products thereof

b) Crustaceans and products thereof;

c) Eggs and products thereof;

d) Fish and fish products;

đ) Peanuts, soybeans and products thereof;

e) Milk and milk products (lactose included)

g) Tree nuts and nut products;

h) Sulfite (salt of sulfurous acid) in concentration of 10 mg/kg.

5. Water added to product shall be enumerated in the list of ingredients except part of the material is in the form of water such as salty water, syrup or soup used in the mixed product and that raw material is already written in the list of ingredients. Water and volatile materials during the production are not required to be written in the list of ingredients.

6. For any condensed or reconstituted product, its ingredients must be listed in descending order in quantity and compulsorily added with a line “Ingredients of the reconstituted product accord with the instructions on the list".

7. For the list of ingredients, a specific name appropriate for the information stipulated for naming of a product and each ingredient must be used except that ingredients as listed using the common name of product category fail to give necessary information, group name can be employed as stipulated in Addenda enclosed herewith.

8. For food additives having their names in the list of additives accepted to be used in food in general and being defined in the following class, a corresponding class name along with a specific name and international numbering system (INS) must be used: acidity regulator, flavors, thickener, foaming agent, gelling agent, anti-caking agent, anti-foaming agent, glazing agent, antioxidant, humectants, bulking agent, preservative, bleaching agent, color retention agent, propellant, packaging gas, raising agent, emulsifier, stabilizer, firming agent, carrier, sequestrant, flour treatment agent, sweetener, color, enzyme.

9. For food additives subject to class of flavorings and flavor enhancers; denatured starch subject to the list of food additives accepted to be used in food, a corresponding class

name must be used. Use of the word “flavorings” on labels must be accompanied with one or a combination of “natural”, “nature-like”, or “general or “man-made"

10. When an additive is added to a food product through initial raw materials it has no effects on the finished product, it is not required to be added to the list of ingredients.

Article 8. Product quantity (net weight/real volumetric/quantity)

1. Product quantity must be written in the international system of units.

2. Product quantity for each product type must be written in the following manners:

a) In real volumetric for liquid type products;

b) In net weight for solid type food;

c) In net weight or real volumetric for foods, both solid and liquid or viscous.

3. For foods which are packaged in liquid environment, dry weight must be written next to net weight.

Article 9. Date of manufacture, shelf-life and instructions for preservation

1. Food manufacturers must ensure accurate and true information about date of manufacture, shelf-life on labels. Shelf-life must be written on direct package or outer package.

2. Date of manufacture may be written as “Production date” or “NSX” (Short form of ‘Production date’ in Vietnamese). Dates must be written in either of the following manners: Using two digits to indicate day and month, two for full four digits to indicate the year); full period (.), dash (-) or forward slash (/) or no character at all can be used between date, month and year. In case no character is used, only six digits are used.

3. Shelf-life must include the following information:

a) Date and month if the shelf-life does not exceed 03 months;

b) Month and year if the shelf-life is longer than 03 months;

c) Date, month and year must be written in an unencrypted series of number.

4. The following products are not required to be written with shelf-life but date of manufacture;

a) Bread or cakes being consumed within 24 hours after production;

a) Cooking vinegar;

c) Salt used for food;

d) Sugar in solid form.

5. Writing date of manufacture and shelf-life for beverage containing at least 10% in alcoholic concentration/volume is not mandatory.

6. Instructions for preservation: shelf-life must be written along with preservation conditions (if any)

Article 10. Usage instructions

1. Usage instruction must be written on labels.

2. In case size of labels is smaller than $10cm^2$, that information must be written in a usage instructional material attached to food product (Form of usage instruction sheet or secondary labels)

Article 11. Recommendations and warnings on food safety

1. Recommendations on health must be based on scientific evidence and must be proved upon announcement of product.

2. Recommendations on nutritional comparisons must comply with the regulations in Addendum 2 enclosed herewith. In case Vietnam is yet to update recommendations on nutritional comparisons, instructions from Codex can be followed.

3. Warnings on safety (if any) must be written on labels with full instruction.

4. Emphasis on absence of one or some of ingredients in the product for the purpose of advertising is not permitted if qualities and uses of the ingredients are similar to substances and ingredients of the same category.

Article 12. Name and address of organizations, individuals responsible for product

Writing name and address of organizations, individuals responsible for the product in the following cases:

1. For imported product: writing name and address of organizations, individuals announcing the product.

2. For domestically manufactured product:

a) In case the product is manufactured at the registered place, name and address of the production facility must be written on labels according to the business registration certificate;

b) In case the product is manufactured at another place other than the registered place but carrying the same brand produced by the latter, address of the former, or name and address of organizations, individuals who announce the product must be written but ensure retrieval of origin;

c) In case the product is manufactured by two or more entities, name and address of the entity performing the final phase to complete the product for launching must be written.

d) In case names and addresses of other entities are added to labels for the purpose of advertising, the correlation between the entities who have their names and addresses added to labels must be written.

Article 13. Product origin

1. For imported products, name of the country of origin must be written in accordance with the law on goods origin.

2. In case the product is packaged in another country different from the manufacturing country, in addition to the name of the country of origin, the name of the country where the final phase of packaging takes place must be written.

Article 14. Certificate of Declaration of conformity or Certificate of Declaration of conformity with the food safety regulations

Every product sold on the market must bear the number of Certificate of Declaration of conformity or Certificate of Declaration of conformity with the food safety regulations issued by competent authorities.

Article 15. Exemption of some mandatory information

1. Exemption from mandatory labeling requirements is applied to labels smaller than 10 cm^2 or having secondary labels or usage instructions being accompanied.

With the exception of spices and herbs, small units with largest surface area being smaller than 10 cm^2 may be exempted from declaration of ingredients, shelf-life, and instructions for preservation, instruction of use if secondary labels or outer package have conveyed all of that information.

2. Secondary labeling shall be exempted in the following cases:

a) Food product is carried along for personal use within a limit of import tax exemption; Food product carried in diplomatic bags and consular bags; food product temporarily imported for export, placed in transit, transferred to bonded warehouses; food product as a sample for testing or studying; food product as a sample to be displayed in trade fair and exhibition;

b) Raw material, food additives, food processing aids, packages, imported for internal production only, transported internally between warehouses from province to province under the same enterprise's system.

Chapter III

LABELING INFORMATION FOR SOME SPECIAL PRODUCTS

Article 16. Food additives for business

In addition to labeling requirements as stipulated in Chapter II hereof, food additives used for business must be labeled as follows:

1. Category and name of the additive, example: emulsifier: Nat polyphosphate; or with international code of the additive (code is placed in parentheses), example: emulsifier (452i)

2. International code (if any)

3. If there are two or more food additives in a package, their names must be written fully in descending order of weight in each package.

4. "Used for food products" must be clearly described under the name of the additive with height of characters being 2 mm at a minimum and bold printing.

Article 17. Irradiated foods

Food products being manufactured, processed and preserved with the use of irradiation technique must be described with the line "Irradiated foods" or displayed on labels an

image of irradiated foods according to the international food irradiation system agreed to put into practice by Vietnam.

Chapter IV

IMPLEMENTATION

Article 18. Effect

1. This Joint circular is effective since December 19, 2014.

2. The Circular No. 15/2000/TT-BYT dated June 30, 2000 by the Minister of Health guiding the labeling of foods shall be expired since the effective date of this Joint circular.

3. The product granted Certificate of Declaration of conformity or Certificate of Declaration of conformity with the food safety regulations has its product label not conforming with the regulations in this Joint circular shall not permitted to continue production and importing after December 31, 2015. In case the product is yet to be sold out, it is still permitted to continue its circulation but must not exceed the shelf-life described on the label.

Article 19. Responsibilities

Ministry of Health, Ministry of Agriculture and Rural Development and Ministry of Industry and Trade have assigned Vietnam Food Administration (Ministry of Health), National Agro - Forestry - Fisheries Quality Assurance Department (Ministry of Agriculture and Rural development) and Department of Science and Technology (Ministry of Industry and Trade) are responsible for implementing, inspecting the exercising of this Joint circular on a national level for products under assignment for management.

Difficulties that arise during the implementation of this Circular should be reported to the aforesaid Ministries for consideration and handling./.

PP MINISTER OF INDUSTRY AND TRADE DEPUTY MINISTER	PP MINISTER OF AGRICULTURE AND RURAL DEVELOPMENT DEPUTY MINISTER	PP MINISTER OF HEALTH DEPUTY MINISTER

ADDENDUM I

CLASS NAME

(enclosed herewith the Joint circular No. 34/2014/TTLT-BYT-BNNPTNT-BCT dated October 10, 2014 by the Ministry of Health, Ministry of Agriculture and Rural development, Ministry of Industry and Trade)

Name of raw material	Name of raw material group
Refined oil other than olive oil	"Oil" together with the term "vegetable" or "animal", qualified by the term "hydrogenated" or "partially-hydrogenrated", as appropriate.
Refined fats	"Fat" together with either the term "vegetable" or "animal"
Starches other than chemically modified starches	"Starch"
All species of fish where the fish constitutes an ingredient of another food and on that label the presentation of such food does not refer to a specific species of fish	"Fish"
All types of meat where such meat constitutes an ingredient of another food and provided that the labelling and	"Meat"

presentation of such a food does not refer to a specific type of meat	
All types of cheese where the cheese or mixture of cheeses constitutes an ingredient of another food and provided that the labelling and presentation of such food does not refer to a specific type of cheese	"Cheese"
All spices and spice extracts not exceeding 2% by weight either singly or in combination in the food	"Spice", "spices" or "mixed spices"
All herbs or parts of herbs not exceeding 2% by weight either singly or in combination in the food	"herbs" or "mixed herbs"
All types of gum preparations used in the manufacture of gum base for chewing gum	"Gum base"
All types of sucrose	"Sugar"
Anhydrous dextrose and dextrose monohydrate	"Dextrose" or "glucose"
All types of caseinates	All types of caseinates
Dairy products containing a minimum of 50% of milk protein (m/m) in dry matter	Milk protein
Pressed, extracted, or refined cocoa butter	"Cocoa butter"
All crystallized fruit in which sugar makes up not more than 10% of the total weight	"Crystallized fruit"

ADDENDUM II

SOME RECOMMENDATIONS ON NUTRITIONAL COMPARISONS PERMITTED LABELING *(enclosed herewith the Joint circular No. 34/2014/TTLT-BYT-BNNPTNT-BCT dated October 27, 2014 by the Ministry of Health, Ministry of Agriculture and Rural development, Ministry of Industry and Trade)*

1. Energy

- Low calories: 4 kcal (170kj) in 100g (solid) or 20 kcal (80kj) in 100 ml (liquid).

- No calories: 4 kcal in 100ml (liquid).

2. Fat:

- Low fat: 3g in 100g (solid) or 1.5g in 100ml (liquid).

- No fat: 0.5g in 100g (solid) or 100ml (liquid).

3. Saturated fat:

- Low saturated fat: 1.5g in 100g (solid) or 0.75g in 100ml (liquid) and providing 10% of the energy from saturated fat

- No saturated fat: 0.1g in 100g (solid) or 0.1g in 100ml (liquid).

4. Cholesterol:

- Low fat: 3g in 100g (solid) or 1.5g in 100ml (liquid).

- No cholesterol: 0.005g in 100g (solid) or 0.005g in 100ml (liquid). Smaller than 1.5g of saturated fat on 100g (solid) or 0.75g of saturated fat in 100ml (liquid) and providing 10% of the energy from saturated fat

5. Sugar:

- No sugar: 0.5g in 100g (solid) or 0.5g in 100ml (liquid).

6. Sodium:

- Low sodium: 0.12g in 100g.

- Very low sodium: 0.04g in 100g.

- No sodium: 0.005g in 100g.

7. Protein:

- As protein supplements: Providing 10% of nutrient reference value in 100g (solid) or 5% of nutrient reference value in 100ml (liquid) Providing 5% of nutrient reference value for 100 kcal (12% nutrient reference value for 1 MJ) or providing 10% of nutrient reference value for a serving.

- High protein: Twice as much as the value of protein supplements

8. Vitamins and minerals

- As vitamin and mineral supplements: Providing 15% of nutrient reference value in 100g (solid) or 7.5% of nutrient reference value in 100ml (liquid) Providing 5% of nutrient reference value for 100 kcal (12% nutrient reference value for 1MJ) or providing 15% of nutrient reference value for a single serving.

- High vitamins and minerals: Twice as much as the value of vitamin and mineral supplements

9. Fiber:

- As fiber supplements: 3g in 100g[3] or 1.5g in 100 kcal, or providing 10% of daily nutrient reference value for a single serving.

- High fiber: 6g for 100 g[3] or 3g for 100 kcal, or providing 20% of daily nutrient reference value for a single serving.

附錄三

Form 1

SOCIALIST REPUBLIC OF VIETNAM
Independence – Freedom – Happiness

PRODUCT SELF-DECLARATION
No...../Name of organization, individual /Year of Declaration

I. Information of organization, individual:
Name of organization, individual:.....
Address:.....
Phone:.....Fax.....
Email:.....
Code of business:.....
Number of Certificate of establishment satisfying food safety conditions:.....
Date/Location of issuance.....(*applicable for establishment subject to certification as stipulated*)

II. Product information

1. Product name:.....

2. Ingredients: .....
3. Expiration date: .....
4. Packaging: .....
5. Name and address of manufacturer: .....

III. **Sample of label: (***enclosed with product's label sample or intended product's label)*

IV. Requirements of food safety
Organizations, individuals manufacture and sale safe food in compliance with:
- National technical regulations:..... ; or
- Ministry's Circular.....; or
- Provincial technical regulations.....; or
- National standard (*if there is no national technical regulation, ministry's circular, or provincial technical regulation*): or;
- Codex standard, regional standard, foreign standard (*if there is no national technical regulation, ministry's circular, provincial technical regulation or national standard)*
- Manufacturer's specifications (*if there is no documents as mention above)*

We commit to fulfil laws and regulations on food safety and are fully responsible for legitimation of self-declaration documents./.

.....date.....month.....year.....
Representative of organization, individual
(sign and stamp)

Form 2

SOCIALIST REPUBLIC OF VIETNAM
Independence – Freedom – Happiness

PRODUCT DECLARATION
No...../

I. Information of organization, individual:
Name of organization, individual:.....
Address:.....
Phone:.....Fax.....
Email:.....
Code of business:.....
Number of Certificate of establishment satisfying food safety conditions:.....
Date/Location of issuance.....(*applicable for establishment subject to certification as stipulated*)

II. Product information
1. Product name:.....
2. Ingredients: .....
3. Key quality indicator(s) for product's usage (for health supplement):.....
4. Expiration date: .....
5. Packaging: .....
6. Name and address of manufacturer: .....

III.* Sample of label: (enclosed with product's label sample or intended product's label)***

IV. Requirements of food safety
Organizations, individuals manufacture and sale safe food in compliance with:
- National technical regulations:..... ; or
- Ministry's Circular ..... ; or
- Provincial technical regulations ..... ; or
- National standard (*if there is no national technical regulation, ministry's circular, or provincial technical regulation*): or;
- Codex standard, regional standard, foreign standard (*if there is no national technical regulation, ministry's circular, provincial technical regulation or national standard)*
- Manufacturer's specifications (*if there is no documents as mention above)*

We commit to fulfill laws and regulations on food safety and are fully responsible for legitimation of declaration documents. We shall manufacture or sale products only after receiving Certificate of Registered Product Declaration./.

.....date.....month.....year.....
Representative of organization, individual
(sign and stamp)

Form 3

Name of Receiving Authority ----------	**SOCIALIST REPUBLIC OF VIETNAM** Independence – Freedom – Happiness *.....date.....month.....year.....*

CERTIFICATE OF REGISTERED PRODUCT DECLARATION
No. ..... /Year/DKSP

…….(Name of Receiving Authority)…..certify to receive a Product Declaration of (name of
organization, individual), address:…….., phone:…….., Fax.... ,
Email:…….. for product:……. manufactured by (name, address of manufacturer
and origin country) in compliance with technical regulations//standards…(number, code, name)…….

The enterprise shall be fully responsible for the conformity of product.

Representative of Receiving Authority
(sign and stamp)

Form 10

Name of Applicant

SOCIALIST REPUBLIC OF VIETNAM
Independence – Freedom – Happiness

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...date...month...year....

REGISTRATION FOR CERTIFICATION OF ADVERTISEMENT CONTENTS

To:.....

1. Name of applicant:.....

2. Address:.....
.....
.....

Telephone:.....Fax:.....

..... Requests to register for advertisement contents as follows:

- For imported products:

+ Origin: name of manufacturer and origin country.

+ Name and address of organization/ individual in charge of declaration, importation or exclusive distribution.

- For domestic products:

+ Name and address of organization, individual in charge of declaration, manufacture or exclusive distribution.

....., date.....*month*.....*year*.....

Representative of Organization/Individual

(Signed and Sealed)

Form 11

Name of Receiving Authority

SOCIALIST REPUBLIC OF VIETNAM
Independence – Freedom – Happiness

...date...month...year....

CERTIFICATE OF ADVERTISEMENT CONTENTS

Name of organization or individual:……
Address:……
…..
Phone:.. ……Fax……
…

No.	Name of products	Number of the Certificate of Product Declaration

The advertisement shall be posted on:…….
……
……. With the contents (in attachment) complied with current regulations.
Organization or individual is responsible for advertising the products in compliance with the approved contents.

Authority
(sign and stamp)

附錄四

Appendix 02

THE SOCIALIST REPUBLIC OF VIET NAM
Independence- Freedom – Happiness

DECLARATION OF COMFORMITY TO TECHNICAL REGULATION/FOOD SAFETY REGULATION

No: .....

Name of organization/Individual.....

Address:.....

Tel:.....Fax:.....

E-mail.....

DECLARE :

Product: .....

.....

Origin: Name and address; telephone, fax; email of manufacturer (for imported product, it should be written name of origin country)

.....

.....

Conform to Technical Regulation/ Food Safety Regulation (No, Code, Name)

.....

.....

Mode of Conformity Assessment:

.....

.....

We would like to commit of applying the periodical inspection and testing as described by the law and be responsible for the conformity of the declared products.

……, date….. month….year….

Representative of Organization/Individual

(Signed and Sealed)

附錄五

Appendix 03a

PRODUCT SPECIFICATION

NAME OF GOVERNING BODY	Name of product group	**No: .....**
Name of organisation/individual	Name of product	

1. Technical requirements:

1.1. Organoleptic properties:

- Physical state (liquid, solid....)

- Color: (describe the possible colors of product from date of finished to the date of expired)

- Odor: (odor of product)

- Other typical state (if needed)

1.2. Essential quality criteria (technical requirement of manufacturer):

Example:

No	**Criteria**	**Unit**	**Declared limit**
1	Humidity		
2	Protein		
	....		

* Explanation:

- Humidity or free water content for dried, solid or mixed products; pH for liquid or viscous liquid.

- Essential quality criteria, nutrition value (stable and easy monitored criteria)

- Solid content per net weight for dried or liquid product (mixed).

- Ashy value for mixed products with different components in different state.

- Criteria for disintegration of high lipid content product (eg: NH_3 content for meat product; Kreiss reaction for fat and oil...)

1.3. Microorganism criteria (according to technical regulation/food safety regulation):

Example:

No	**Criteria**	**Unit**	**Maximum limit**
1	Total plate count	CFU/g or ml	

2	*E. Coli*	CFU/g or ml	
	....		

* Explanation:

- Maximum limits declared by manufacture must be within allowed limits during whole product's life and they are not allowed to exceed the hygienic regulation for food or food group that are compulsory (technical regulation) to apply in accordance with technical /food safety regulations.

1.4. Heavy metals (according to technical regulation/food safety regulation):

Example:

No	**Criteria**	**Unit**	**Maximum limit**
1	Arsenic	ppm	
2	Lead	ppm	
	...		

1.5. Content of contaminated chemicals (pesticide, other chemical).

* Explanation: clearly noted that it was conformed to technical regulation/food safety regulation for specific food or food group.

2. Ingredients:

* Explanation: list of all ingredients and food additives used in food processing in value decreased order. If the key ingredient is used as the name of the product, the percentage of the ingredient should be noted except if the ingredient already printed on the label.

3. Expiry date (best before date) (clearly noted the location of that date in the retailed package).

4. Instruction for use and Storage: instruction for cooking, using, target group, storage condition and precaution if needed.

5. Package material and packaging.

6. Processing line (with detailed explanation of processing line): noted in Annex of product specification.

7. How to distinguish the real and fake products (if available).

8. Labeling content: shall be conformed to food labeling regulations.

9. Origin and organization/ individual in charge of product

* Explanation: origin place where the product is packed and labeled/

No.	Name of products	Number of the Certificate of Product Declaration	Date of Registration for Product Declaration

The advertisement shall be posted on:……
The dossier consists of the following documents……
We commit that the dossier and information mentioned above are true and shall advertise the products in compliance with the Certificate of advertisement contents.

Applicant
(sign and stamp)

參考資料

1. Crcular No. 43/2014/TT-BYT:Providing the management of functional foods
2. ASEAN Guidelines Annex I - Guiding Principles for Inclusion into or Exclusion from the Negative List of Substances for Traditional Medicines and Health
3. Decree No. 89/2006/ND-CP :n labelling of goods
4. Joint circular No. 34/2014/TTLT-BYT-BNNPTNT-BCT:dated October 27, 2014, guidance on the labeling of goods for foods, food additives, and packaged food processing aids
5. Decree No. 15/2018/ND-CP: REGULATING THE IMPLEMENTATION OF A NUMBER OF ARTICLES OF THE LAW ON FOOD SAFETY
6. 越南保健營養食品協會(Vietnam association of functional foods)官網: http://www.vaff.org.vn/kien-thuc-35/5-cach-phan-loai-thuc-pham-chuc-nang-b3471
7. VitafoodAsia:https://www.vitafoodsasia.com/en/media-centre/industry-updates/vitafoods-asia-2019-nutraceuticals-opportunity-in-vietnam.html
8. Research Forecast: https://researchforecast.com/vietnam-functional-food-supermarket-market-sales/
9. Consumer Health in Vietnam, Euromonitor International LTD,2019
10. 越南食品管理局官網:https://vfa.gov.vn/
11. 外貿實務查詢服務網:http://wmsw.mofcom.gov.cn/wmsw/
12. Institute for Health Metrics and Evaluation: http://www.healthdata.org/
13. US CDC: https://www.cdc.gov/
14. 越南統計局部(general statistics office of Vietnam): https://www.gso.gov.vn/en/homepage/