



Please quote our reference in your reply
HPRG (HSU) 2011-02-0016

19 February 2011

INTERNATIONAL ADVANCED BIO-PHARMACEUTICAL INDUSTRIES PTE LTD

Attn: Mr Lee Chee Cheow

DID: 65 68663499

FAX: 65 64789039

Dear Mr Lee

FITNESS+ NATTO ESSENCE MK7

Thank you for your enquiry on the above product.

2 From the information supplied, please be advised that this product presently does not need to be registered and can be imported and sold without a licence from this Authority provided the requirements stated in Annex 1 are complied with.

3 As the above product contains "Vitamin K2", please be advised that the product must be labeled with the cautionary statement, or words with similar intent: "*Consult a health care professional prior to use if you are taking blood thinner such as warfarin*".

4 We note from the product information provided that it contains a claim, "prevent vascular calcification" that is deemed as objectionable in nature. Please remove or tone down the objectionable claim from the product materials to ensure that all information related to your product is in compliance with the Medicines (Advertisement and Sale) Act and all relevant requirements.

5 As the above product can affect the health of consumers, the onus of responsibility for the safety and quality of this product and compliance with the Guidelines for Health Supplements rests with you as the importer/manufacturer/seller/dealer. Moreover, it is imperative that you also possess adequate knowledge on the products dealt by your company.

6 More information on health supplements, including the above guidelines, can be found at [\[http://www.hsa.gov.sg/publish/hsaportal/en/health_products_regulation/complementary_medicines/supplements.html\]](http://www.hsa.gov.sg/publish/hsaportal/en/health_products_regulation/complementary_medicines/supplements.html).

7 Please note that this letter is not to be construed as an endorsement/approval of the product in question nor of any claim made for it and is not to be used in the advertisement/sales promotion of the product.

8 This advice is given without prejudice to any future legislative and administrative change on the control of the product concerned. It may not be applicable or may be superseded as and when new information on the product is subsequently obtained.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Liyun', written in a cursive style.

NG LIYUN (MS)
for GROUP DIRECTOR
HEALTH PRODUCTS REGULATION GROUP
HEALTH SCIENCES AUTHORITY

Encl. Annex 1

Presently, there are no licensing requirements for the import, manufacture and local sales of these products.

2 However, dealers must ensure that:

- (a) the products do not contain any substances controlled under the Poisons Act, which is available as reference from the Singapore National Library.
- (b) the products do not contain prohibited substances including amygdalin, pangamic acid, danthron, suprofen and rhodamine B;
- (c) the products do not contain any other substances except those stated on the labels;
- (d) the heavy metal contents of the products do not exceed the following limits: Arsenic (5 ppm), Copper (150 ppm), Lead (20 ppm) and Mercury (0.5 ppm).
- (e) the compositions and quantities of all the ingredients of the products are printed in English Language on the product labels and cartons;
- (f) the products must not be labelled, advertised or promoted for any medicinal purpose, e.g. treatment or prevention, implied or otherwise, of any disease or medical condition, including the 19 diseases/conditions specified in the Medicines (Advertisement and Sale) Act, namely blindness, cancer, cataract, drug addiction, deafness, diabetes, epilepsy or fits, hypertension, insanity, kidney diseases, leprosy, menstrual disorders, paralysis, tuberculosis, sexual function, infertility, impotency, frigidity, conception and pregnancy.

3 For products containing materials (including those for making capsule shells) derived from ruminants e.g. cattle, buffalo, sheep, goat, deer and antelope, please refer to our guidelines on Transmissible Spongiform Encephalopathy (TSE). The guidelines can be downloaded from our website at:

http://www.hsa.gov.sg/publish/etc/medialib/hsa_library/health_products_regulation/complementary_medicines/files_1.Par.2923.File.tmp/CMB%20TSE%20Guidelines-08V2.pdf.

4 Dealers should contact the Plant Health Regulatory Branch, Agri-Food & Veterinary Authority, Sembawang Research Station, Lorong Chencharu, Singapore 769193, Tel: (65) 6751 9815, Fax: (65) 6752 0170, if the products contain substances listed under the Endangered Species (Import & Export) Act.