AATMI & AAHSHA NEWSLETTER

FOR ASEAN TM AND HS MICRO, SMALL AND MEDIUM ENTERPRISES (MSME)

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INFORMATION AND DISSEMINATION CAMPAIGNS

That the MSME may be aware of the harmonized or TMHSPWG adopted definition of Health Supplements:

> "... Health Supplements means any product that is used to supplement a diet and to maintain, enhance, and improve the healthy function of the human body and contains one or more, or a combination of the following:
>
> (a) vitamins, minerals, amino acids, fatty acids, enzymes, probiotics, and other bioactive substances;
>
> (b) substances derived from natural sources, including animal, mineral, and botanical materials in the forms of extracts, isolates, concentrates, metabolites; and
>
> (c) synthetic sources of ingredients referred in (a) and (b).

Health Supplements are presented in dosage forms and administered in small unit doses such as capsules, tablets, powder, and liquids and shall not include any sterile preparations such as injectables or eye drops."

Annotation: Note the form of health supplement: it is in "dosage form and administered in small unit doses." It appears like a pharmaceutical product in pills, tablets, or capsules but not a pharmaceutical.

The ordinary meaning of the phrase "to supplement" means to complete, or to enhance, or to improve. In this sense, health supplement is a product prepared or formulated in dosage form to improve the diet of person to maintain, enhance and improve the healthy function of the human body.

A simplistic and popular example of a health supplement is Vitamin C 500 mg. capsule that is formulated and placed in the market to supplement the recommended Vitamin C nutrient to enhance antioxidants that may help strengthen the body's natural defenses.

By this definition, a health supplement is understood to contain substance or substances that will either provide benefits either to maintain, and/or enhance and/or improve healthy functioning of the body. For this reason, labeling of health supplement product must contain information of its intended use to inform the consumer of the supplementation the product provides.

MSME should ask what the form of its product is, its ingredients and the product's intended use to determine if his product is within the definition of a health supplement. If not, he should check if his product is a traditional medicine.

INFORMATION EXCHANGE

The Singapore TCM Organizations Committee (STOC), a member of AATMI, within the first part of 2024, continues to convey and update its members about the development and progress of the ACCSQ TMHSPWG; STOC joined regular dialogue with the AMS regulators on changes that would impact the trade. The Trade Association visits other countries to foster relationships and understand the differences in the rules and regulations to promote cross- border trade.

The Health Supplements Industry Association of Singapore conducted an ASEAN HS GMP Workshop on 13 May 2024 which was made open to all interested parties.

The Health & Dietary Supplement Association of the Philippines (HADSAP), a member of AAHSA, held its General Membership Meeting (GMM) in Quarter 1 of 2024 with the presence of an officer of the FDA Phil's Center for Food Regulation and Research. Challenges and opportunities in the registration or pre-market authorization process were discussed to arrive at a productive resolution.

HADSAP submitted its Position Paper and participated in the Public Consultation on the

proposed adoption of the ASEAN guidelines on the Maximum Level of Vitamins and Minerals. It has scheduled technical training in Quarter 3 to include issues and concerns of MSME's as among the subjects for deliberation.

The Chamber of Herbal Industries of the Phils. Inc. (CHIPI), a member of AATMI likewise participated in the Public Consultation on the proposed adoption of the ASEAN Guidelines on the Maximum Level of Vitamins and Minerals. It has scheduled its 2nd General Membership Meeting on 14 June 2024 where Challenges faced by the health Supplements Industry and Opportunities of the ASEAN HS Harmonization will be deliberated on.

Jointly CHIPI and HADSAP filed their Position Paper, as well, for the constitution of Product Claim Working Group for Food Supplement and Traditional Medicines Containing Botanical or Herbal Ingredient on 22 April 2024.

The industry associations (courtesy of AAHSA/HADSAP) have noted the following links containing information on TM & HS Claims:

Indonesia: BPOM Decree No. 19 Year 2022 regarding Guideline for Health Supplement Claims

https://standar-otskk.pom.go.id/storage/uploads/0e16acb3-91ce-465f-85e9- 8601f3639191/PerBPOM-No.-19-tahun-2022.pdf

Malaysia: Appendix 6 Guideline of Registration of Health Supplements of DRGD 3rd ed., 4th rev.

ABOUT THE ASEAN CONSULTATIVE COMMITTEE ON STANDARDS AND QUALITY, TRADITIONAL MEDICINE AND HEALTH SUPPLEMENT (ACCSQ TMHSPWG) MEETING

Both the ASEAN Agreements on Regulatory Framework for Health Supplements and Regulatory Framework for Traditional Medicines have been finalized. The signing thereof by the ASEAN Member States (AMS) are pending on the completion of the Instrument of Full Powers (IFP) to sign the Agreements. Indonesia submitted her IFP to the ASEAN Secretariat together with a Declaration on Genetic Resources and Traditional Knowledge (GRTK). This Indonesian GRTK declaration has paused the completion of the IFPs and has become subject of deliberation by the AMS or the ACCSQ TMHSPWG. The deliberation about the GRTK declaration is ongoing and has not yet been concluded.

About the intended Annexes to the Agreements, the Meeting is taking up proposed updates on Annex I, Guiding Principles for Inclusion into or Exclusion from the Negative List of Substances for TMHS; Annex IV-Minimizing Risk of Transmission of Transmissible Spongiform Encephalopathies in TM and HS; and the Restricted List of Active Ingredients.

ONE OF THREE PARTS PRIMER OF THE ASEAN GUIDELINES ON LABELING FOR HEALTH SUPPLEMENTS (HS)

"Primer" as used herein means an article of basic information on the adopted ASEAN labeling guidelines in a question-and-answer form intended to aid or help MSMEs in reading and/or following the ASEAN Guidelines. The comments in the Primer are intended to help but are not the official replies of the Regulators or National Regulatory Agencies.

This first part of the Primer covers the mandatory or compulsorily required information on the HS labeling and annotations to assist in understanding the requirements. The second part will be on special particulars, situations, or circumstances relevant to HS labeling, and the third part will be on Country-Specific Requirements.

For the labeling guidelines themselves, please refer to the copy of adopted Annex IX on ASEAN Guidelines on Labeling Requirements for Health Supplements following this Primer.

PRIMER ON THE ADOPTED ASEAN HS LABELING
Part One of Three

1. If a Micro Small and Medium Enterprise (MSME) markets or distributes its product only in one (1) ASEAN Member State (AMS), will it be required to comply with the ASEAN common labeling guidelines for HS?

Comment: Yes, there ought to be only one guideline for the HS industry to follow.

2. What are the basic guiding principles in HS labeling?

Comment: Label information should be truthful and not falsely attribute characteristics or product's attributes in any manner that can deceive consumers into believing what the product is not.

3. What language will be used in HS labeling?

Comment: Depending on the regulation of the AMS where the product is marketed:

- English and the official or national language of the AMS; OR

- English or the official/national language of the AMS.

4. What mandatory information must appear on the HS label?

- Product Name

- Dosage Form

- Name and Strength of Active Ingredient

- Batch or Lot Number

- Manufacturing Date and Expiry Date; or Expiry Date only

- Directions for Use

- Indication or Intended Use

- Storage Condition

- Country's Registration Listing or Notification Number (if applicable)

- Name and Address of Manufacturer

- Name and Address of Marketing Authorization Holder or Importer

- Warning (if any)

- Pack Size

- Special Statements

5. What is a "product name"?

Comment: It is the appropriate description of the product; it can be accompanied by a brand name as a distinguishing identity of the product. It should not mislead the consumer about its attributes or characteristics. For example, a product name may be "Vitamin C Tablet" with a brand name "XY Cee".

6. Dosage Form

Comment: Referring to the definition of HS, the forms of HS recognized are pills, tablets, capsules, or in small doses appearing like pharmaceuticals but are not.

7. Name and Strength of Active Ingredients

Comment: Active ingredients are the main ingredients that are purported to provide the intended use of the health supplement, as distinguished from the product's excipients or commonly referred to as "other ingredients". Active ingredients derived from plants or animals must be identified by their scientific name followed by the plant part used.

8. Batch or Lot Number

Comment: This is the identification of the batch referring to the stocks' traceability, usually representing a single cycle of production or part thereof. The guideline requires that this be printed or permanently marked on the product's container.

9. Manufacturing and Expiry Date OR Expiry Date only

Comment: This guideline allows the option to state the manufacturing date and expiry date OR expiry date only. Popularly done is the Manufacturing Date and Expiry Date. But as the guideline provides, the marketing authorization holder or the company who places the product in the market can choose to use the expiry date only. The question here that may need further discussion is the format of the dates. If the product is in several AMS, the format of the expiry date will need further discussion by the AMS.

10. Directions for Use

Comment: Health supplements being in small doses like pharmaceuticals, the directions for each of the target populations/target consumers need to be clearly stated.

11. Indication or Intended Use

Comment: By the HS definition in the ASEAN Agreement on Regulatory Framework (Agreement), HS products have the recognized intended use to "maintain, enhance, and improve the healthy function of the human body". This guideline requires that the marketing authorization holder of the company who will place the HS product in the market indicate on their label the HS's intended use.

12. Storage Condition

Comment: The label shall state under what condition the shelf-life of the product can be maintained. The guideline relates this requirement to Annex V of the Agreement on ASEAN Guidelines on Stability and Shelf -life of Health Supplements.

13. Country's Registration Listing or Notification Number (if applicable)

Comment: What is meant by "if applicable"? There may be AMS which do not require pre-market authorization like registration, notification, or listing, for instance. The product in those AMS will have no country's registration listing or notification number; so no number on the label is necessary.

14. Name and Address of Manufacturer

Comment: The address of the manufacturer may be a challenge if the HS product is

processed by more than one manufacturer. This guideline may need more clarification during implementation.

15. Name and Address of Marketing Authorization Holder or Importer

Comment: The name may refer to the HS product owner who sub-contracts the manufacturing to another company or to an importer.

16. Warning (if any)

Comment: Usually warnings and precautions are guided by the regulations that impact or govern restricted ingredients.

17. Pack Size

Comment: The HS must state the net contents of the package in the metric system: liquid by volume; solid forms by weight or amount; and semi-solid or viscous form either by weight or volume.

18. Special Statements

Comment: This is usually dictated by AMS country-specific regulations applying to the type or nature of the HS product. This guide may be associated with or related to Country-Specific labeling requirements. The adopted ASEAN Labeling Guidelines

EDITORIAL ARTICLE

(By Lorna Frances Filipino, not of the Associations she represents)

Botanicals, plant materials, plant parts, or extracts are commonly used as active ingredients in traditional medicines, herbal medicines, processed foods, food supplements, and cosmetic products. These uses are not exhaustive; botanicals may also have applications beyond these categories in healthcare or health-related products.

In ASEAN Member States where healthcare products—such as medicines, food, food supplements, cosmetics, or medical devices—require pre-market approval or authorization, the classification of products containing botanicals has become a significant challenge.

There are instances where a herbal medicine has pre-market authorization, but the herb or botanical ingredient used in the registered product may no longer qualify for pre-market authorization or registration in another category, such as food supplements. This situation presents significant challenges for both the industry and regulators.

Pre-market authorization standards and requirements for medicines are generally more stringent than those for health supplement products. Consequently, pre-market authorization or registration of a health supplement product containing a botanical or herb already used in an herbal medicine may be denied.

As a result, the product owner of the health supplement cannot market the product. Furthermore, since the health supplement offers benefits to "maintain, enhance, and improve the healthy function of the human body," consumers in the affected AMS where registration or pre-market authorization cannot be granted will be unable to access the product.

Harmonizing the principles or criteria for the classification of products containing botanical ingredients may help address these challenges.

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Annex IX on ASEAN Guidelines on Labeling Requirements for Health Supplements

ANNEX IX

ASEAN GUIDELINES ON LABELLING REQUIREMENTS FOR HEALTH SUPPLEMENTS

Introduction

The ASEAN Guidelines on Labelling Requirements for Health Supplements applies to Health Supplements (HS) to ensure the safe and effective use of HS among consumers and facilitate registration process among Member States. It also promotes proper storage and logistic condition.

Guiding Principles

1. HS shall not be described or presented on any label or in any labelling in a manner that is false, misleading, or deceptive or is likely to create an erroneous impression regarding its character in any aspect.

2. HS shall not be described or presented on any label or in any labelling by words, pictorial, or other devices which refer to or are suggestive either directly or indirectly of any other product.

3. The principal display panel shall be large enough to accommodate all the mandatory label information required to be placed thereon with clarity and conspicuousness and without obscuring design.

4. The label information should be in English and/or the official or national language(s) subject to the regulation of each Member State and be written clearly and easy to understand. Languages other than English may be included on labels with a required declaration to confirm that the meaning in the other languages is the same as that given in the English and/or official language(s).

   Languages used for labelling in each Member State are as follows:

   - in Brunei Darussalam, the official language is Bahasa Melayu or Malay. Label information shall be in Malay and/or English. However, in the event there is contradiction, the interpretation provided in Malay will prevail. Nevertheless, English is still recognised in Brunei Darussalam as an authentic text;

   - in Cambodia, the official language is Khmer. Label information shall be in Khmer. However, other languages, such as English and French, may be used in addition to Khmer;

   - in Indonesia, the official and national language is Bahasa Indonesia, therefore the language in the label shall be written in Bahasa Indonesia. However, other languages may be used in addition to Bahasa Indonesia;

   - in Lao PDR, the official language is Lao. Label information shall be in Lao. However, other languages in smaller fonts, such as English, may be used in addition to Lao;

   - in Malaysia, the official language is Malay, however, the label information shall be in Malay and/or English. Other languages, such as Mandarin, Tamil, Arabic, if any, may be used in addition to these two languages;

   - in Myanmar, the official language is Myanmar, therefore, the language in the label shall be in Myanmar. However, other languages, such as

English, may be used in addition to Myanmar;

- in the Philippines, the official languages are Filipino and English. Label information shall be in English and/or Filipino. Other languages, if any, may be used in addition to these two languages;

- in Singapore, the official languages are Malay, Chinese, Tamil, and English. However, label Information shall be in English. Other languages, if any, may be used in addition to English;

- in Thailand, the official and national language is Thai, therefore, the language in the label shall be in Thai. However, other languages, such as English, may be used in addition to Thai; and

- in Viet Nam, the official language is Vietnamese. Label information shall be in Vietnamese. However, other languages may be used in a font size not larger than Vietnamese.

General Labelling Requirements for HS

The following information shall appear on the label of HS.

1. *Product Name*

   The product name and the brand name, if applicable, should not be misleading or deceptive to the consumer. The product and brand names should be deemed appropriate by the respective Member States.

2. *Dosage Form*

3. *Name and Strength of Active ingredient*

   The name and quantity of plants or animals from which the active ingredient is derived should be declared in scientific name followed by plant part constituting the crude drug and type of preparation, where applicable. The use of the common or local name of the active ingredient is optional. For mineral, common or chemical name should be used.

   For example:

   - Each capsule contains: Curcuma longa (rhizome) 350 mg.

   - Each capsule contains: Compound herbal extract 20 mg.

   - Prepared from leaves of Plant A, Root of Plant B, and leaves of Plant C

4. *Batch or lot number*

   Each container shall be printed or permanently marked. The batch or lot number shall be preceded by title such as “Batch number”, “BN”, etc.

5. *Manufacturing and expiry date, or expiry date only*

   The manufacturing date and expiry date, or expiry date only should be declared as month and year and preceded by title such as “Manufacturing date”, “MFG” “Expiry date”, “EXP”, etc.

6. *Directions of use*

   Directions of use must clearly state the route of administration as well as the dose for each target population for which the product is intended.

7. *Indication or Intended use*

The statement of the purpose or intention of use for HS should be declared according to the Annex VII (ASEAN Guidelines on Claims and Claims Substantiation for Health Supplements).

8. *Storage condition*

The statement declares a condition to which the HS should be stored properly until the expiry date. Refer to Annex V (ASEAN Guidelines on Stability Study and Shelf-Life of Health Supplements).

9. *Country's registration, listing, or notification number (if applicable)*

The combination of numbers, symbols, and letters assigned to the HS which is approved by the regulatory authority shall be declared, if applicable.

10. *Name and address of manufacturer*

The complete name and address of the manufacturer of the product shall be declared.

11. *Name and address of marketing authorisation holder or importer*

The complete name and address of the marketing authorisation holder or importer of the product shall be declared.

12. *Warning (if any)*

The statement declares a warning for consumers' awareness before using HS. The warning statement assigned by the regulatory authority should be declared. The term "Warning" can be used interchangeably, but is not limited to terms such as "Side Effects", "Contraindications", and "Precautions" as appropriate.

13. *Pack size*

The net contents shall be declared in the metric system. The net contents shall be declared in the following manner:

- for liquid form, by volume;
- for solid form such as tablet, soft capsule, hard capsule, powder, etc. by weight or amount; and
- for semi-solid or viscous form, either by weight or volume.

14. *Special statements*

- alcohol content, if any
- for external use, as applicable

Small Label

The small label should declare at least the following:

1. product name and brand name, if applicable;
2. country's registration, listing, or notification number (country specific);
3. batch or lot number;

4. manufacturing and expiry date, or expiry date only; and

5. other information according to general labelling requirements should be declared on package insert and/or another container or accompanied with a catch cover.

Strip or Blister Pack Label

The label on strip or blister pack should declare at least the following:

1. product name and brand name, if applicable;

2. country‘s registration, listing, or notification number (country specific);

3. batch or lot number;

4. manufacturing and expiry date, or expiry date only; and

5. other information according to general labelling requirements should be declared on package insert and/or another container or accompanied with a catch cover.

Country Specific Requirements for HS

Country specific requirements are allowed if they are deemed necessary for the reasons of identification, safety, quality, culture, and religion. Such country specific requirements with reasons should however be made known to the other Member States and be updated into the compilation of country specific requirement for HS from Member States in a timely manner. However, minimisation of country specific requirement should be encouraged.

The compilation of country specific requirement for HS from Member States appears in Appendix 1.

Glossary

For the purposes of this Annex:

(a) **active ingredient** means a substance produces the intended activity of a HS;

(b) **batch or lot number** means a designation (in numbers, or letters, or combination of both) that identifies the batch and that permits the complete history of the batch including all stages of production, control, and distribution, to be traced and reviewed;

(c) **container** means an article that contains and protects the HS. This includes primary packaging components and/or secondary packaging components, if latter are intended to provide additional protection to the product. The packaging components shall be a blister pack, strip pack, bottle, sachet, tube, or other similar articles, but does not include an article intended for ingestion;

(d) **country's registration, listing, or notification number** means the combination of numbers, symbols, and letters reflecting the identification of a HS issued by the regulatory authority;

(e) **dosage form** means the form in which HS are marketed for use (e.g. tablet, capsule, solution, powder, etc.) that contains active ingredient(s) generally, but not necessarily, in association with excipients;

(f) **expiry date** means a date fixed for each individual batch before which the batch still meets the required standard specifications for quality;

(g) **indication or intended use** means a statement of the purpose or purposes for which HS is intended to be used;

(h) **labelling** means all information that appears on the container, including that on the outer packaging such as carton;

(i) **manufacturer** means a company that carries out at least one step of production as well as the final release of the finished product;

(j) **manufacturing date** means a date fixed for the individual batch, indicating the starting date of the manufacture;

(k) **marketing authorisation holder** means the company or corporate or legal entity in the field of HS in whose name the marketing authorisation has been granted. This party is responsible for all aspects of the product, including quality and compliance with the conditions of marketing authorisation. The party must be subjected to legislation in the country that issued the marketing authorisation, which normally means being physically located in that country;

(l) **package insert** means any printed information supplied with the container or primary pack;

(m) **small label** means a label with very limited space to display minimal information requirements in the small container as described in the general labelling requirements for HS. The dimension of small label shall be determined by each Member State; and

(n) **strip or blister pack label** means a label affixed to or printed on the strip or blister pack. The strip or blister pack needs to be repacked in another container or accompanied with a catch cover whose label can display information described in general labelling requirements for HS so that consumers can obtain such information at the point of purchase.

References Used

1. *CODEX Alimentarius International Food Standards. General Standard for the Labelling of Prepackaged Foods. Labelling of Prepackage Food (CODEX STAN 1-1985) 2008:1-7.*

2. Therapeutic Goods Administration (TGA). Registration of Complementary Medicines. Australian Regulatory Guidelines for Complementary Medicines (ARGCM) 2005.

3. *Therapeutic Goods Administration (TGA). General requirements for labels for medicines Therapeutic Goods Act 1989: Therapeutic Goods Order No.69 2001.*

4. *EUROPEAN COMMISSION. Guideline on the Readability of the Label and Package Leaflet of Medicinal Products for Human Use. Belgium: 2006.*

5. *ASEAN Guidelines on Good Manufacturing Practice for Health Supplements.*

APPENDIX 1

COUNTRY SPECIFIC REQUIREMENTS FOR LABELLING OF HEALTH SUPPLEMENTS

Country	Country Specific Requirements
Brunei Darussalam	Sources of ingredients derived from animal origin including gelatine
Cambodia	"Health supplements" / "Food supplements" / "Dietary supplements" *Note:* - *The product name should be clearly stated on the label.*
	"This product is not medicine and it is not intended to replace medicine"
	Font size *Note: The size of the letter of the health supplement's name must be bigger than the size of the other letters.*
Indonesia	"Health supplements" / "Food supplements" / "Dietary supplements" *Note:* - *The product must be labelled with the words "suplemen kesehatan"*
	Statement on additive added (preservative, colorant, flavour, sweetener) in line with Indonesian regulations

Country	Country Specific Requirements
	Sources of ingredients derived from animal origin including gelatine *Note:* - *If porcine, this parameter is justified by Act & Decrees.* - *For product containing porcine, in line with Indonesian regulations, add this statement that this product contains animal part(s) (porcine or pig), but written in Indonesian language as follows:* **MENGANDUNG BABI**
	Recommended daily allowance (RDA) for vitamins or minerals used as health supplements in line with Indonesian regulations
	Font size *Note:* - *The size of the letter of the health supplement's name must be bigger than the size of the other letters.* - *2D barcode should be applied on the label.*
Lao PDR	"Health supplements" / "Food supplements" / "Dietary supplements"
	"This product is not medicine and it is not intended to replace medicine"
Malaysia	Statement on additive added (preservative, colorant, flavour, sweetener) *Note: Name and content of preservative(s), where present.*

Country	Country Specific Requirements
	Hologram
	Sources of ingredients derived from animal origin including gelatine *Note:* - *For product containing animal part(s), please add this statement: This product contains animal part(s).* - *For product containing animal origin(s), please add this statement: This product contains substance(s) from animal origin.* - *For product containing porcine, please add this statement: This product contains animal part(s) (porcine or pig).*
	The words “Keep out of reach of children” or words bearing similar meaning in both Malay & English
	Use of the HALAL logo will be considered for HS for both the local and export market, provided that such products have been certified and approved as HALAL by the local authority
Myanmar	“Health supplements” or alike
	General labelling requirements as issued by Department of Traditional Medicine and Myanmar Consumer Protection Commission
Philippines	“Food supplements” / “Dietary supplements”
	Recommended daily allowance (RDA) for vitamins or minerals used as food or dietary supplements *Note: Revised standard terms as 2002 Recommended Energy and Nutrients Intakes (RENI) per day (adopted as per Bureau Circular No.16 s.2005).*

Country	Country Specific Requirements
	The caption “NO APPROVED THERAPEUTIC CLAIMS” shall be printed in the principal display panel of all labelling materials, font size 14, font type Arial, all capital and bold letters *Note: As per Memorandum Circular No.2 s. 1999.*
	Allergen information, as applicable and Nutrition Information/Facts and Expiry or Expiration Date Format – Day Month Year *Note: As per Administrative Order 2014-0030 Revised Rules and Regulations Governing the Labeling of Prepackaged Food Products further amending certain provisions of Administrative Order No. 88-B s. 1984 or the Rules and Regulations Governing the Labeling of Pre-packaged Food Products Distributed in the Philippines”, and for Other Purposes.*
	Guidelines on Generic Labelling requirements as issued by the Food and Drug Administration (Philippines) such as: Administrative Order No. 2016-0008 Revised Rules and Regulations Governing the Generic Labeling Requirements of Drug Products for Human Use
Singapore	-
Thailand	“Food supplements” *Note: Notification No.293 (2005 Re: Food Supplement).*
	Statement on food additives added (i.e. preservative, colorant, flavour, sweetener) *Note: Notification No.293 (2005 Re: Food Supplement).*

Country	Country Specific Requirements
	The term “Warning” shall be used with the following statement: “Should not be consumed by children and pregnant women” “Should eat varieties of five food categories regularly in appropriate proportion” “No effect for prevention or treatment of diseases” *Note: Notification of the Ministry of Public Health (No. 411) B.E.2562 Issued by virtue of the Food Act B.E. 2522 Re: Food Supplements (no.4).*
Viet Nam	“Health supplements” / “Food supplements” / “Dietary supplements”
	“This product is not medicine and it is not intended to replace medicine”