

General Non-Specific Health Claims

1. Overview

This annex provides guidance on the appropriate use of general non-specific health claims on foods. It supports Food Business Operators (FBOs) in understanding how such claims can be used correctly on food products.

When reference is made to general, non-specific benefits of a nutrient or food for overall good health, it must be accompanied by a specific and related, authorised Article 13 or 14 health claim from the EU register of health claims and meet the conditions of use. The authorised claim must appear in the vicinity of or after the general non-specific claim or be linked with an asterisk. Examples of general non-specific health claims include

- 'Immune support'
- 'Heart Health'
- 'Gut health'

With reference to general non-specific health claims, the European Commission have stated that *'statements of this nature could be useful to the consumer in that they would send a more engaging message, but they could be misunderstood or misinterpreted by the consumer, who could infer health benefits that are different or better than the actual effects...'*¹

General non-specific health claims cannot suggest effects beyond the normal function^a or exaggerate the meaning of the specific authorised claim. They must have the same meaning to the consumer as the authorised specific claim and cannot make the claim 'stronger'. They also cannot imply disease prevention or treatment.

As a Food Business Operator (FBO) you must be able to substantiate the use of voluntary information on your label and also comply with the general principles of food labelling under Article 7 of Regulation (EU) No 1169/2011 on the provision of food information to consumers.

^a Claims that imply the product can fix, treat, enhance, or exceed normal physiology or provide benefits that exceed what a normal, healthy body does on its own

On hold claims

This guidance does not address the use of 'on-hold claims' including those on botanical substances. For further information on the use of 'on-hold claims' please visit [Permitted Claims | Food Safety Authority of Ireland](#)

2. Examples of General Non-Specific Health Claims

The following sections provide examples of compliant and non-compliant wording for general, non-specific health claims across a range of physiological functions. Each example includes an authorised article 13 or 14 claim that may be used to support the general statement once the conditions of use specified in the EU register of health claims^b are met.

Please note that the examples of unauthorised wording provided are illustrative only and do not represent an exhaustive list of all potential non-compliant wording.

2.1 Immune function

The authorised claims regarding the immune system refer to the "normal function of the immune system" with its associated conditions of use. The meaning of the authorised claim must be maintained. Terms such as "boosting" imply the product would give extra effects beyond the normal function and this is not permitted.

Non-specific general health claim	Example of supporting authorised article 13 or 14 claim
'Immune support' ✓ Immune boosting' X 'Flu fighter' X	<i>'Vitamin C contributes to the normal function of the immune system'</i>

2.2 Energy metabolism

The authorised health claims regarding energy refer to the "normal energy-yielding metabolism" with associated conditions of use. The meaning of the authorised wording must be maintained. Terms such as 'energising', 'euphoric feeling', 'instant hit', 'invigorating', 'stimulating', and

^b [EU register | Food and Feed Information Portal Database | FIP](#)

‘thrilling’ imply the product would give extra effects beyond the normal function and this is not permitted.

Non-specific general health claim	Example of supporting authorised article 13 or 14 claim
‘Energy support’ ✓ ‘Supports energy metabolism’ ✓ ‘Energy Booster’ ✗ Energising ✗	<i>‘Biotin contributes to normal energy-yielding metabolism’</i>

2.3 Weight/fat loss

Claims which specifically refer to the rate or amount of weight loss i.e. ‘Loose 1kg per week’ are not permitted under Article 12 of Regulation (EC) 1924/2006. Only authorised claims on the EU register are permitted in line with their conditions of use.

There are no authorised health claims in relation to fat burning and therefore claims referring to such, including ‘Burn’ are not permitted. There are some authorised health claims regarding weight loss on the EU register that can be used on meal replacements with associated conditions of use. Meal replacement products for weight control replace 1-2 meals per day and have strict criteria on their composition in order to bear the authorised health claims outlined on the EU register.

Claims are not permitted on total diet replacements for weight control.

Non-specific general health claim	Example of supporting authorised article 13 or 14 claim
‘Contributes to weight loss’ ✓ ‘Supports weight loss’ ✓ ‘Fat Burner’ ✗ ‘Lose weight fast’ ✗	<i>‘Glucomannan in the context of an energy restricted diet contributes to weight loss’</i>

2.4 Brain function/cognitive function

The authorised claims regarding brain function refer to the ‘maintenance of normal brain function’ with its associated conditions of use. The meaning of the authorised wording must be

maintained. Terms such as "boost", 'fuel' or similar imply the product would give extra effects beyond the normal function which is not permitted.

Non-specific general health claim	Example of supporting authorised article 13 or 14 claim
'Supports normal brain function' ✓ 'Brain Fuel' ✗ 'Boost your brain' ✗ 'Brain Food' ✗	<i>'Carbohydrates contribute to the maintenance of normal brain function'</i>

2.5 Muscle function

The authorised claims regarding muscle function refers to 'normal muscle function'. The authorised claims regarding muscles mass refer to 'the maintenance of muscle mass' and 'contributes to a growth in muscle mass' with its associated conditions of use. The meaning of the authorised wording must be maintained.

Non-specific general health claim	Example of supporting authorised article 13 or 14 claim
'Supports normal muscle function' ✓ 'Power your muscles' ✗ 'Hulk Power' ✗	<i>'Potassium contributes to normal muscle function'</i> <i>'Protein contributes to a growth in muscle mass'</i>

2.6 Psychological function

The authorised claims regarding psychological function refer to 'normal psychological function' with its associated conditions of use, and therefore this wording and meaning must be maintained.

Non-specific general health claim	Example of supporting authorised article 13 or 14 claim
'Supports normal psychological function' ✓ 'Calming' ✗ 'Reduces stress' ✗ 'Stress buster' ✗	<i>'Biotin contributes to normal psychological function'</i>

2.7 Digestive function

The authorised claims regarding digestive function refer to ‘the normal function of digestive enzymes’ or supporting ‘normal digestion’ with its associated conditions of use. The meaning of this authorised wording must be maintained.

Non-specific general health claim	Example of supporting authorised article 13 or 14 claim
‘Gut Health’ ✓ ‘Good for your gut’ ✓ ‘Digestive support’ ✓ ‘Gut loving/gut happiness’ ✗ Boost your gut health’ ✗ ‘Heal your gut’ ✗	<i>‘Calcium contributes to the normal function of digestive enzymes’</i> <i>‘Rye fibre contributes to normal bowel function’</i>

2.7.1 Lactose digestion

The authorised specific health claim in relation to lactose digestion is ‘*Live cultures in yoghurt or fermented milk improve lactose digestion of the product in individuals who have difficulty digesting lactose*’ with associated conditions of use. This may be used to support the general non-specific health claim ‘Live yoghurt cultures’ on the label once the conditions of use outlined on the EU register of health claims are met.

About 4-5 % of Irish people are affected by lactose intolerance². Considering these low levels of lactose intolerance in the Irish population, the specific authorised claim on lactose digestion is not sufficient to support a ‘gut friendly’ or ‘gut health’ general non-specific health claim. This may mislead consumers without lactose intolerance about the potential digestive benefits of the product.

Non-specific general health claim	Example of supporting authorised article 13 or 14 claim
‘Live yoghurt cultures’ ✓	<i>‘Live cultures in yoghurt or fermented milk improve lactose digestion of the product in individuals who have difficulty digesting lactose’</i>

'Live' X 'Active' X 'Probiotic' X	
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2.7.2 Probiotic and Prebiotic Health Claims

The terms 'probiotic' and 'prebiotic' are health claims^c. Stating 'contains probiotic/prebiotic' (or similar) on a product is not the same as saying 'contains ingredient X'. It is more than just mentioning the product contains bacteria. It implies that the product contains a substance that may be beneficial for health. Anything that states, suggests or implies a relationship between food and health is considered a health claim. For this reason, the terms 'probiotic' and 'prebiotic' when used on a food label, are considered health claims. There are no approved health claims for probiotics or prebiotics.

Please see further information on probiotic health claims at [Probiotic Health Claims - Probiotics | Food Safety Authority of Ireland](#)

2.8 Satiety

Statements referring to satiety are considered health claims. Article 13 (1) of Regulation 1924/2006 states that health claims other than those that refer to a reduction in disease risk or children's development and health including claims that refer to a reduction in the sense of hunger or an increase in the sense of satiety are health claims.

There are no authorised health claims referring to satiety on the EU register. Therefore, claims referring to satiety are not permitted. Examples of such unauthorised health claims include

- 'Keeps you fuller for longer' X
- 'Fullness that lasts' X

2.9 Sleep

A claim to improve sleep may be a medicinal claim or a health claim depending on the context of the claim and the nature/effect of the product.

The only approved health claim for sleep is for synthetic melatonin '*Melatonin contributes to the reduction of time taken to fall asleep*' with its associated conditions of use. However, despite this approved claim, in Ireland, food supplements containing synthetic melatonin are considered medicinal at any dose and hence foods placed on the market in Ireland must not contain synthetic melatonin. The Health Products Regulatory Authority (HPRA) are the

^c [Decision on how the European Commission deals with the labelling of foodstuff that contain probiotics as 'health claims' \(case 2273/2023/MIK\) | Decision | European Ombudsman](#)

competent authority for medicines in the Republic of Ireland; they are responsible for the classification of medicinal ingredients. There are no authorised health claims in relation to sleep for use on food and/or food supplements in Ireland.

3. Other Common General Claims

3.1 Antioxidant claims

Claims such as 'contains antioxidants', which refer to a function in the body, are defined as health claims and must be authorised before use. If in the naming of the 'substance' or 'category of substances' there is a description or indication of a functionality or effect on health, the 'contains claim' becomes a health claim not a statement of fact.

Terms such as 'Full of antioxidants' or 'Packed with antioxidants' makes the claim stronger and is not permitted. An example of a compliant claim in relation to antioxidants is outlined below.

Claim	Supporting article 13 claim	Conditions of use
'Contains antioxidants' ✓	<i>Olive oil polyphenols contribute to the protection of blood lipids from oxidative stress</i>	The claim may be used only for olive oil which contains at least 5 mg of hydroxytyrosol and its derivatives (e.g. oleuropein complex and tyrosol) per 20 g of olive oil. In order to bear the claim information shall be given to the consumer that the beneficial effect is obtained with a daily intake of 20 g of olive oil.
'Full of powerful antioxidants' X		

3.2 Claims referring to 'Detox'

Article 13 (1) of Regulation (EC) 1924/2006 defines Article 13 claims as '*Health claims describing or referring to: (a) the role of a nutrient or other substance in growth, development and the functions of the body*'.

As the term 'detox' refers to a function in the body, it is considered a health claim. There are no authorised health claims on the EU register of health claims for 'detox'. The word 'detox' refers to unspecific benefits; therefore, it is considered an unauthorised health claim and is not permitted on food products.

Examples of such unauthorised health claims in relation to detox include

- 'Promotes body's detoxification processes' **X**
- 'For daily detoxification support' **X**
- 'Detoxification effects' **X**

3.3 Claims referring to vitality and healthy ageing

There are no authorised health claims on the EU register of health claims referring to 'ageing' and 'vitality' and therefore such claims are not permitted on food products.

3.4 Claims referring to fruit and vegetable content

Claims referring to fruit and vegetable content or claims relating to '5 a-day' should conform with the EU Member State Government's Criteria or the World Health Organisation recommendations and advice on what constitutes a portion of fruit or vegetables. The WHO recommends at least 400 g (i.e. five portions) of fruit and vegetables per day making an adult portion size approx. 80-100g per serving³.

The Irish National Healthy Eating Guidelines advise 5-7 portions of fruit and vegetable per day for adults aged 19-51+ years⁴.

A Quantitative Ingredient Declaration (QUID) should be present on products carrying such statements or claims to aid consumer choice and understanding. The information on the label must not be misleading to the consumer as per Article 7 of Regulation (EU) No 1169/2011.

3.5 Claim referring to 'healthy', 'nutritious', 'healthier choice' 'Goodness' or similar

The terms 'healthy choice/healthy/nutritious/goodness' and any claim likely to have the same meaning for the consumer can be considered a 'general non-specific health claim'.

Article 10 of Regulation (EC) 1924/2006 states 'Reference to general, non-specific benefits of the nutrient or food for overall good health or health-related well-being may only be made if accompanied by a specific health claim included in the lists provided for in Article 13 or 14'. The specific authorised health claim must be present on the label, and the food must meet the conditions of use in order to make the general health claim e.g. 'healthier choice'. As an FBO you must be able to substantiate the use of this general health claim on the label. The use of the general health claim must also comply with the general principles of food labelling under Article 7 of Regulation (EU) No 1169/2011 on the provision of food information to consumers. Reference to food products that are high in fat, sugar and salt as 'healthy' is misleading to the consumer and masks the overall nutritional profile of the food.

4. Use of Symbols, Graphics and Pictures

Regulation (EC) 1924/2006 states that a 'claim' means any message or representation, which is not mandatory under Community or national legislation, including pictorial, graphic or symbolic representation, in any form, which states, suggests or implies that a food has particular characteristics'. Unless otherwise made clear (e.g. that a heart symbol on a product is referring to 'love' rather than a cardiac health benefit) symbols are considered general non-specific health claims and should be supported by a relevant authorised health claim. Symbols should not be misleading to the consumer or exaggerate the health effect.

5. Medicinal claims

Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers states

'food information shall not attribute to any food the property of preventing, treating or curing a human disease, nor refer to such properties'.

Medicinal claims are prohibited on food products. The Health Products Regulatory Authority (HPRA) are the competent authority for medicines in the Republic of Ireland, they are responsible for the classification of medicinal ingredients and medicinal claims.

References

1. Commission Implementing Decision of 24 January 2013 adopting guidelines for the application of the specific conditions for health claims set out in Article 10 of Regulation (EC) No 1924/2006 of the European Parliament and of the Council [EUR-Lex - 02013D0063-20130125 - EN - EUR-Lex](#)
2. National Dairy Council Ireland. (2022). *How common is lactose intolerance?* [How Common Is Lactose Intolerance? - National Dairy Council Ireland](#)
3. Diet, nutrition and the prevention of chronic diseases: report of a Joint WHO/FAO Expert Consultation. WHO Technical Report Series, No. 916. Geneva: World Health Organization; 2003.
4. Food Safety Authority of Ireland (2011). *Scientific Recommendations for Healthy Eating Guidelines in Ireland*. Dublin: Food Safety Authority of Ireland. ISBN: 1904465765.