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Guide to Japanese Labeling Requirements for Post Harvest Fungicide

Report Categories:

Food and Agricultural Import Regulations and Standards - Narrative

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Report Highlights:

In Japan, post harvest fungicides (PHF) are classified as food additives. As such, Japan requires exporters to label produce treated with (PHF) and detail their usage. This report explains the purpose of PHF labeling and provides examples of Japan's labeling requirements for export packages and display requirements at the retail point of sale.

General Information:

In Japan, post harvest fungicides (PHF) are uniquely classified as food additives under the Food Sanitation Law due to their function as food preservers. The Ministry of Health, Labor, and Welfare (MHLW) administers food additive policy according to the Food Sanitation Law. For more information on this policy, please consult the latest "[Standards Applying Generally to Food Additives.](#)" PHF are listed in the table of standards for use as anti-molding agents on the first page of the list along with information on target foods and maximum residue limits.

Currently, there are six substances approved for use as PHFs in Japan. These include: Diphenyl, Imazalil, o-Phenylphenol (OPP), Sodium o-Phenylphenate (OPP-NA), Tiabendazole (TBZ) and the recently approved Fludioxonil. For more information on Japan's approval of Fludioxonil, please refer to the GAIN report [JA0021](#) "Designation of Fludioxonil as a new Food Additive." In addition, only the following products are allowed to be treated with PHFs, namely, apples, apricots, bananas, cherries, citrus fruits, Japanese plums, kiwifruits, loquats, nectarines, peaches, pears, pomegranates, and quinces. All export packages containing produce treated with PHFs must have PHF labeling at the time of entry into Japan. Generally, packers include PHF information on their export packages when designing carton boxes for Japan. As the Japanese government does not require PHF labeling for treated produce to clear customs, it is technically possible for importers to pass treated produce through customs without the PHF information on the cartons. However, Japanese importers generally request packers to lithograph or include stickers detailing PHF information on cartons before shipping in order to avoid having to apply labels at Japanese ports. Nonetheless, Under Cabinet Office Ordinance (No. 45 1-2: August 31, 2011 [Reference in Japanese.](#)) importers are required to display PHF information on cartons of imported produce when they sell fruits to distributors or retailers immediately after customs clearance.

The pictures below are examples of current PHF labeling on imported cartons.



Photo 1: U.S. Export packages of citrus products at Tokyo Ohta wholesale market. PHF information (Product-Orange, Fungicide - Tiabendazole (TBZ) and Imazalil) are identified with stickers on each carton.



Photo 2: U.S. Export packages of citrus products at Tokyo Ohta wholesale market. PHF information (Commodity/Name – Minneola Tangelo, Fungicide – Imazalil, Tiabendazole used) is lithographed on each carton.

According to the Japanese Government, the purpose of the label on export packages is to convey PHF information down to retailers as retailers who sell imported fruits individually are required by administrative guidelines to prepare in-store signs/label to display PHF information at the retail point of sale. This information is usually displayed on a small sign next to unpackaged fruit which detail each chemical used and their respective purpose.



Photo 3: Fungicide – Example of in-store signs of PHF for grapefruits from South Africa.
 Left photo: Fungicides: Thiabendazole (T.B.Z.) and Imazalil
 Right photo: Fungicides: Sodium o-Phenylphenate (OPP-NA), Thiabendazole (TBZ), Imazalil



Photo 4: Example of label on individual packages for lemon from the U.S.A.

Left photo: Individual package at a retail store.

Right photo: American product, lemon, fungicides (Thiabendazole, Imazalil and Fludioxonil) are used, 2 pieces.

In instances where retailers sell fruit in individual packaging, labeling should be used on each package. This information should include: country of origin, product name, PHF information and number/volume. Usually this packing process is conducted in Japan. If U.S. packers make their own individual packing or individual wrapping of their products, importers will most likely ask for the PHF label to be displayed on both the outside of the export package as well as the individual packages in the box.

Please note that this report is written based on general labeling rules and current empirical practices. Packers may get various requests from importers regarding PHF labeling. Hence, this report is meant to clarify between what it is actually required by the Japanese government and what might be simply importer preferences/requests. For more information on labeling practices, please contact the FAS/Office of Agricultural Affairs' labeling analyst at agtokyo@fas.usda.gov