

USDA Foreign Agricultural Service

# GAIN Report

Global Agricultural Information Network

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## Japan

**Post:** Tokyo

### **Japan Initiates Review of Food Additive Labeling Requirements**

**Report Categories:**

Agricultural Situation

FAIRS Subject Report

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**Report Highlights:**

Japan's Consumer Affairs Agency (CAA) held its first committee meeting to review food additive labeling requirements on April 18, 2019. The CAA plans to hold multiple committee meetings over the next several months on revising the current food additive labeling standard, if at all, by the end of March 2020.

## General Information:

In 2015, CAA unified three different food labeling laws (i.e., Food Sanitation Act, Japan Agricultural Standard Law, Health Promotion Act) and developed the comprehensive Food Labeling Standard. This new standard will be fully enacted beginning in April 2020 (see [JA7078](#)). Food additive labeling, however, was positioned as a matter to be reviewed separately from the Food Labeling Standard, similar to country of origin labeling (COOL) for processed foods manufactured in Japan (see [JA7132](#)) and labeling requirements for genetically engineered food (see [JA7067](#)). On April 18, 2019, Japan's Consumer Affairs Agency (CAA) met to review Japan's food additive labeling requirements.

Japan's additive labeling system requires manufacturers to label all [food additives](#) (455 [designated additives](#), 365 [existing food additives](#), approximately 600 [natural flavoring agents](#), and roughly 100 [ordinary foods used as food additives](#), as of April 2019). The current requirements also mandate that all food additives be labeled by their substance names (e.g., Sodium L-Ascorbate), commonly used other names (e.g., Vitamin C Sodium Salt), or abbreviated/grouped names (e.g., Vitamin C, V.C.). Food additives used for eight specific objectives (preservative, sweetener, food coloring, food color former, thickener/ stabilizer/gelling agent, antioxidant, bleaching agent, and fungicide) must be labeled to identify the additive's function and substance name together (e.g., preservative (sodium benzoate)).

In an effort to facilitate consumer understanding, some substances are allowed to be labeled using their collective terms instead of the actual substance names. These collective terms include, flavor agent, gum base, yeast food, brine water, enzyme, gloss agent, reducing agent, umami seasoning, tofu coagulant, bittering agent, emulsifier, pH adjuster, leavening agent, and flexibilizer.

Labeling can be exempted when food additives are: 1) for nutritional enrichment, 2) for processing aids (e.g., hexane for oil crushing which does not remain in the final product), or 3) carry over (i.e., minor food additives for ingredients).

In addition to reviewing additive labeling requirements, the CAA also intends to review "additive-free" labeling used by some food manufacturers. For example, some wine makers advertise that wine made from concentrated grape juice is "antioxidant (i.e., sulfurous acid) free" even though it is possible sulfurous acid could be carried over from concentrated grape juice. "Additive free" labeling will also be reviewed to ensure accuracy in representing the nature of products and that consumers are not misled.

The CAA prepared four preliminary discussion topics for the review: 1) how to prioritize the order of compounds on a label, 2) how to incorporate supplemental information from websites, 3) how to display information effectively on packages, and 4) how to incorporate foreign languages.

Some committee members (identified in the Attachment) commented:

- All food additives are already confirmed to be safe (as long as they are used according to the regulation) so food additive labeling is not a safety issue.
- There is a trade-off between the amount of information to be published on a package and its legibility (space for labeling is limited).
- The committee should understand the opinions of consumers and industry before initiating a discussion.
- This committee has to accurately understand the needs of consumers.
- Current food additive labeling standards and regulations are functioning well, and business operators do not appreciate frequent changes in regulations.
- Risk communication and education issues for food additive safety should be separated from the discussion on additive labeling.
- It is important to compare Japan's labeling system against CODEX and other major countries, and the historical background of Japan's system should be understood as well.
- "Additive-free" and "not-using" labeling should be banned since it could mislead consumers.

The CAA is planning to hold a committee meeting every 1-2 months. The committee will invite business operators from the food industry and representatives from consumer groups to hear their perspectives over the course of the next two committee meetings. Committee members will then discuss and decide which elements of the food additive labeling system may warrant revision. The CAA has noted it will endeavor to conclude the review process by the end of March 2020, if not sooner.

**Reference Materials:**

Handouts and additional information on the committee meeting are available on the CAA's website at (in Japanese) at: [https://www.caa.go.jp/policies/policy/food\\_labeling/other/review\\_meeting\\_012/](https://www.caa.go.jp/policies/policy/food_labeling/other/review_meeting_012/)

**Attachment:** List of Committee Members

Name	Title
Mr. Motohiro Nishijima (Chair of Committee)	Professor Emeritus, Jissen Women's University
Ms. Yoshiko Arita	President, Japan Homemaker Association
Mr. Shigeyuki Inami	Section Director, Tokyo Metropolitan Government Bureau of Social Welfare and Public Health, Food Monitoring Section
Mr. Yoichi Ueda	Senior Director, Japan Food Additives Association
Ms. Yuki Uragou	Co-Founder & Executive Director, National Liaison Committee of Consumers' Organization (Shodanren)
Mr. Shigeru Ohkuma	Manager, National Supermarket Association of Japan
Ms. Miyoko Sakata	Vice Director, Japan Association of Consumer Affairs Specialists (JACAS)
Ms. Kyoko Sato	Director, National Institute of Health Sciences (NIHS)
Mr. Toru Takeishi	Manager, Japan Food Industry Center (JAFIC)
Mr. Toshiro Nakagaki	Professor, Kyoto Prefectural University of Medicine
Ms. Maki Morita	Consultant, Food Communication Compass (FOOCOM)