

USDA Foreign Agricultural Service

GAIN Report

Global Agricultural Information Network

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Japanese Stakeholders Argue Against Additive-Free Labeling

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Agricultural Situation

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Report Highlights:

The Consumer Affairs Agency (CAA) held the second and the third review committee meetings for the labeling of food additives on May 30 and June 27, 2019, respectively. For these meetings, the CAA invited representatives from consumer groups and food industry to present their views and concerns. All presenters urged the CAA to either regulate or ban additive-free labeling.

General Information:

Japan's Consumer Affairs Agency (CAA) initiated a series of committee meetings for the labeling of food additives on April 18, 2019 ([JA9053](#)). The CAA invited representatives from consumer groups and food industry for the second and third committee meetings to present their views and concerns.

On May 30, 2019, the CAA held the second review committee meeting which included presentations from the following five individuals representing consumer groups:

- Ms. Honomi Fujita, The Seikatsu Club Consumers' Co-operative Union ([SCCCU](#))
- Ms. Mariko Ichikawa, [Food Communication Round Table Talks](#)
- Ms. Michiko Kamiyama, [Citizen Network Concerning Food Labeling](#)
- Ms. Mutsuko Nimura, Japanese Consumers' Co-operative Union ([Co-op](#))
- Ms. Yuriko Inubushi, [Consumption Science Center](#)

All presenters agreed that the CAA should regulate or ban “no added [additive type] (e.g., no preservative)” labeling for the reason that it potentially misleads consumers. For example, one presenter commented that certain ingredients, like glycine, can be used as a preservative to lengthen shelf-life yet is labeled with the collective term or function term¹ as “umami seasoning (amino acid).” Two of the presenters further expressed a preference to require labeling of individual substance names instead of collective or function terms, which are currently allowed, arguing that some food additives may not be safe for consumption. However, the other presenters countered that argument as they considered all government approved food additives to be safe.

On June 27, 2019, the CAA held the third review committee meeting which included presentations from the following five individuals representing food industry:

- Ms. Yoko Ogiwara, [Japan Umami Seasoning Association](#)
- Mr. Akihiro Matsunaga, [Yamazaki Baking Co., Ltd.](#)
- Mr. Hidekazu Takamatsu, [Mitsubishi Corporation Life Sciences Holdings Limited](#)
- Mr. Yukio Suzuki, [Sun Bel'x Co., Ltd.](#)
- Mr. Kiyoshi Iwama, [NH Foods Ltd.](#)

All presenters stated that the CAA should regulate “no added [additive type] (e.g., no MSG, no yeast food, no emulsifier)” labeling as consumers may have a negative perception of these food additive types. They agreed that the current labeling standards work well to communicate necessary information to consumers, and, aside from the need to regulate additive-free labeling, that there is no need to change the rules. All presenters also supported the use of collective or function names on food labels instead of individual chemicals for the reason that it is easier for ordinary consumers to understand. The presenters are opposed to frequent labeling rule changes by the CAA due to the added costs associated with

¹ Japan's requirements mandate that most additives be labeled by their substance names (e.g., DL-Alanine), but some must be labeled with their function name and substance name (e.g., preservative (sorbic acid)). Also, the following 14 categories are allowed to label collective names without writing individual substance names; yeast food, gum base, brine, bittering agent, enzyme, glazing agent, flavoring agent, acidifier, softener, umami seasoning, tofu coagulant, emulsifier, pH adjuster, and leavening agent.

required alterations. Food manufacturer representatives expressed that they would be opposed to mandatory disclosure of supplemental food additive information on their websites, as updating the information could be burdensome given the frequent recipe changes at their factories.

The speakers' presentation materials are available in Japanese on the CAA's website at:
https://www.caa.go.jp/policies/policy/food_labeling/other/review_meeting_012/