Perspective of Food Labelling Systems in Japan: An Update

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Our mission
• To protect and promote consumer’s interest and benefit
• To ensure the voluntary and rational choice of goods and services
• To ensure fair labelling of the goods closely related with consumers’ life

Consumer Affairs Agency (CAA)
• An external organ of the Cabinet Office
• Established on September 1, 2009

Organisation of Consumer Affairs Agency (As of 2014/7/1)

There are other specialized offices or teams such as:
• “Office of Personal Information Protection’’
• “Cross-Division Team for enhancing the understanding of consumers related to food and radioactivity to prevent harmful rumors”, etc.
• Perspective of Food Labelling
  — Acts previously concerning food labelling
  — A newly promulgated act: the Food Labelling Act of 2013
  — Introduction of mandatory nutrition labelling

**Acts previously concerning food labelling in Japan**

Issue 1: There had been a number of various notifications under these three Acts.

<table>
<thead>
<tr>
<th>Food Sanitation Act</th>
<th>Japan Agricultural Standard Act*</th>
<th>Health Promotion Act</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Purpose</strong></td>
<td><strong>Purpose</strong></td>
<td><strong>Purpose</strong></td>
</tr>
<tr>
<td>• To prevent the sanitation hazards resulting from eating and drinking</td>
<td>• To improve quality of agricultural and forestry products</td>
<td>• To improve nutritional status and promote health</td>
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<td></td>
<td>• To help consumers choose products by enforcing proper quality labelling of them</td>
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<tr>
<td></td>
<td>• Enforcing the regulations concerning Food and Additives, Apparatus and Containers and Packaging</td>
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<td></td>
<td>• Prohibition of the sales for the products which do not conform to the standards and/or criteria</td>
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<td></td>
<td>• Giving approval to a person who intends to conduct business from the prefectural governor</td>
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<td></td>
<td>• Enactment of labelling standards to be observed by Manufacturer, etc. (Article 19-2)</td>
<td></td>
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<tr>
<td></td>
<td>• Compliance with Standards for Quality Labelling (Article 19-13-2)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Enactment of Japanese Agricultural Standards</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Grading in accordance with Japanese Agricultural Standards etc.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Enactment of nutrition labelling standards (Article 31)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Compliance with Standards (Article 31-2)</td>
<td></td>
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<tr>
<td></td>
<td>• Set a general policies</td>
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<td></td>
<td>• Implementation of the national health and nutrition survey</td>
<td></td>
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<tr>
<td></td>
<td>• Prevention of passive smoking</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• License pertaining to Food for Special Dietary Uses</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Giving approval to a person who intends to conduct business from the prefectural governor</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• To ensure safety of products</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• To improve quality of products</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Instructions on keeping</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Net contents</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Ingredients</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• country of origin</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Genetic modification</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Allergy</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Etc.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Etc.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>JAS Act: Japan Agricultural Standard Act</td>
</tr>
</tbody>
</table>
Topics

- Perspective of Food Labelling
  - Acts previously concerning food labelling
  - A newly promulgated act: the Food Labelling Act of 2013
  - Introduction of mandatory nutrition labelling

The New Food Labelling Act

Objectives:

- To ensure food safety while eating and drinking
- To ensure general consumers’ opportunities to select food subjectively and rationally

The New Food Labelling Act (Cont.)

Areas of focus:

- Establishment of a comprehensive system regarding food labelling:
  - Some different definitions among Acts are standardized (e.g. “fresh food” and “processed food”)
- Introduction of mandatory nutrition labelling

Progress toward the new Act

To address these issues:
1. Some different definition among Acts
2. Many and various notifications under Acts
3. Voluntary nutrition labelling

Food Labelling Bill

One year round-table discussion (From Sep. 2011 to Aug. 2012)

Cabinet approval (June 14, 2013)


Proclamation (June 28, 2013)
Specific rules under the new Act

Food Labelling Standard
(Came into effect on April 1, 2015)

Mandatory nutrition labelling

[Points of discussion]
Consumer Affairs Agency (CAA) considered:

1. Which nutrients should be mandatory?
2. What kinds of food should be exempted?
3. What kinds of manufacturers should be exempted?

[Points of discussion (cont.)]

4. Whether the breakdown of the declarations should be introduced or not?

```
| Energy  | Protein | Fat   | Carbohydrate | Sodium | Saturated Fatty Acid |
```

OR
```
| Energy  | Protein | Fat   | Saturated Fatty Acid |
```

5. Whether amounts of sodium should be declared as sodium or salt equivalents?
6. Reviewing Nutrient Reference Values (NRVs)
Mandatory nutrition labelling

[Points of discussion]
Consumer Affairs Agency considered:

1. Which nutrients should be mandatory?
2. What kinds of food should be exempted?
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Mandatory nutrition labelling

[Points of discussion]
Consumer Affairs Agency considered:

1. Which nutrients should be mandatory?
2. What kinds of food should be exempted?
3. What kinds of manufacturers should be exempted?

Mandatory and Voluntary Nutrition Declaration

[Approach]
- Considering the following three points, requirements for nutrition declaration were decided for the new standard.
  1. The need of declaration for the consumer (in relation to the national intake level, non-communicable diseases, etc.)
  2. The feasibility of such labelling for the food business operators
  3. International consistency

When a nutrient meets all of the above aspects, declaration of such nutrient becomes mandatory.

[New Standard]

<table>
<thead>
<tr>
<th></th>
<th>Mandatory</th>
<th>Voluntary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Energy, Protein, Fat, Carbohydrates, Sodium (as Salt equivalent)</td>
<td>Vitamins, minerals, etc other than those written above</td>
<td></td>
</tr>
</tbody>
</table>

Mandatory and Voluntary Nutrition Declaration in the Food Labelling Standard

[New Standard]

<table>
<thead>
<tr>
<th></th>
<th>Processed Food (Prepackaged Food)</th>
<th>Fresh Food</th>
<th>Food Additives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mandatory</td>
<td>○&quot;1</td>
<td>×</td>
<td>○&quot;1</td>
</tr>
<tr>
<td>Voluntary</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
</tbody>
</table>

"1 Excluding food for business use. Also, food products which fulfill the following criteria can be omitted mandatory nutrition declaration labelling.
- A small packaged product
- Alcoholic beverages
- A food product contains insignificant amount of nutrients
- A food product sold by small business operators

Target food products for nutrition declaration in the Food Labelling Standard

<table>
<thead>
<tr>
<th></th>
<th>Processed Food (Prepackaged Food)</th>
<th>Fresh Food</th>
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<tr>
<td>Mandatory</td>
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<tr>
<td>Voluntary</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
</tbody>
</table>

O: applied  ×: exempted
[Points of discussion (cont.)]

4. Whether breakdown of the declarations should be introduced or not?

Energy | Energy
Protein | Protein
Fat | Fat
Carbohydrate | Carbohydrate
Sodium | Sodium
Saturated Fatty Acid | Saturated Fatty Acid

Format 1

Declaration of mandatory nutrients only

Nutrition Declaration
Reference amount (per 100g or 100ml, per serving (indicate the mount for one serving), per package or other unit)

<table>
<thead>
<tr>
<th>Energy</th>
<th>kcal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Protein</td>
<td>g</td>
</tr>
<tr>
<td>Fat</td>
<td>g</td>
</tr>
<tr>
<td>Saturated fat</td>
<td>g</td>
</tr>
<tr>
<td>n-3 fatty acid</td>
<td>g</td>
</tr>
<tr>
<td>n-6 fatty acid</td>
<td>g</td>
</tr>
<tr>
<td>Cholesterol</td>
<td>mg</td>
</tr>
<tr>
<td>Carbohydrate</td>
<td>g</td>
</tr>
<tr>
<td>Available carbohydrate</td>
<td>g</td>
</tr>
<tr>
<td>Sugars</td>
<td>g</td>
</tr>
<tr>
<td>Dietary fiber</td>
<td>g</td>
</tr>
<tr>
<td>Salt equivalent</td>
<td>g</td>
</tr>
</tbody>
</table>

(Other nutrients other than written above) mg, µg

Format 2

Declaration of voluntary nutrients in addition to mandatory nutrients

*1 A voluntary nutrient which amount is not declared can be omitted from this format.

*2 In case the use of a frame is difficult, a frame can be omitted.

Nutrition Declaration Format

[Points of discussion (cont.)]

5. Whether amounts of sodium should be declared as sodium or salt equivalents?

6. Reviewing Nutrient Reference Values (NRVs)
Nutrient Reference Values (NRVs)

- **Derivation of NRVs**
  - Based on DGs or RDAs from 2015 Dietary Reference Intakes for Japanese
  - Target population: male and female aged 18 years and older
  - A population-weighted average of age and gender-specific DGs or RDAs for each nutrient

* DG: Tentative Dietary Goal for preventing LRDs
* RDA: Recommended Dietary Allowance

Nutrient Comparative Claims

<table>
<thead>
<tr>
<th>Claim</th>
<th>Nutrient</th>
<th>New Standard</th>
<th>CODEX (reference)</th>
</tr>
</thead>
<tbody>
<tr>
<td>“Reduced” “Less than” “Fewer” or a synonymous claim</td>
<td>Energy, Fat, Saturated Fat, Cholesterol, Sugars, Sodium</td>
<td>A minimum absolute difference equivalent to the figure defined as “low”</td>
<td>A minimum absolute difference equivalent to the figure defined as “low” or as a “source” in the Table to the Guidelines</td>
</tr>
<tr>
<td>“Increased” “More than” or a synonymous claim</td>
<td>Protein, Dietary fiber</td>
<td>A minimum absolute difference equivalent to the figure defined as a “source”</td>
<td>A relative difference of at least 25% between the compared foods (CAC/GL 23-1997)</td>
</tr>
<tr>
<td>Minerals (other than sodium), Vitamins</td>
<td>A difference of at least 10% of NRVs between the compared foods (both solids and liquids)</td>
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<td></td>
</tr>
</tbody>
</table>

Health Claims

- **Nutrient Comparative Claims**
- **Non-addition claims**

Non-addition Claims

**[Approach]**
- In response to the inclusion of non-addition claims in the Codex Guidelines (CAC/GL 23-1997), the same conditions shall be prescribed in the new standard.
- “Sugars” have been included in the mandatory nutrition declaration at the revision of the Codex Guidelines (CAC/GL 2-1985) in 2011, whereas “sugars” are voluntary declaration in Japan. Therefore, it shall be mandatory to declare the amount of “sugars” when making a claim regarding the non-addition of sugars.

**[New Standard]**
The conditions prescribed in the Codex Guidelines (CAC/GL 23-1997) were adopted.

* Underlined parts are the parts changed from the previous standard.
Non-addition Claims (Reference)

7.1 Non-Addition of Sugars

Claims regarding the non-addition of sugars to a food may be made provided the following conditions are met.

(a) No sugars of any type have been added to the food (Examples: sucrose, glucose, honey, molasses, corn syrup, etc.);
(b) The food contains no ingredients that contain sugars as an ingredient (Examples: jams, jellies, sweetened chocolate, sweetened fruit pieces, etc.);
(c) The food contains no ingredients containing sugars that substitute for added sugars (Examples: non-reconstituted concentrated fruit juice, dried fruit paste, etc.); and
(d) The sugars content of the food itself has not been increased above the amount contributed by the ingredients by some other means (Example: the use of enzymes to hydrolyzed starches to release sugars).

7.2 Non-Addition of Sodium Salts

Claims regarding the non-addition of sodium salts to a food, including “no added salt”, may be made provided the following conditions are met*.

(a) The food contains no added sodium salts, including but not limited to sodium chloride, sodium tripolyphosphate;
(b) The food contains no ingredients that contain added sodium salts, including but not limited to Worcestershire sauce, pickles, pepperoni, soya sauce, salted fish, fish sauce; and
(c) The food contains no ingredients that contain sodium salts that are used to substitute for added salt, including but not limited to seaweed.

* Competent authorities may permit the addition for technological purposes of sodium salts other than sodium chloride as long as the final food would still comply with the conditions for “low in sodium” claims as described in the Table to these Guidelines.

Thank you very much for your attention.

Official mascot of Consumer Affairs Agency