



The Changing World of Food Labelling Regulations

Japanese Standard Labelling

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The Changing World of Food Labelling Regulations: Japanese Standard Labelling

The Food Information to Consumer Regulation (FICR) has rocked the EU labelling world. Its impact is being felt far beyond Europe, as many countries follow suit by introducing similar nutrition and allergen labelling legislation. The new Standard Labelling in Japan highlights, however, that while countries may begin with similar regulatory objectives to inform consumers, it doesn't follow that the final format of the product label will look the same.

In 2011, the Food Information to Consumer Regulation (FICR) was published in the EU and changed the EU labelling world. It brought together EU rules on general food labelling and nutrition labelling into one piece of legislation. As a consequence, between December 2011 and December 2014, artwork on products sold in all 28 EU Member States needed to be redesigned to factor in the FICR requirements.

The impact of the publication of the FICR stretched beyond the EU. Many European countries outside of the EU changed their labelling regulations to harmonise fully or partially with the FICR provisions. This includes Switzerland, Norway, Turkey and many eastern European countries, such as Bosnia-Herzegovina and Macedonia.

FICR influence beyond Europe

The food labelling world has been on the move ever since the publication of the FICR. In October 2013, the Gulf Co-operation Council published a new labelling standard. Although at first glance this may not be in line with the FICR, many major amendments such as the

introduction of mandatory nutrition labelling and allergen labelling are similar. In the same year in North Africa, Morocco and Algeria also published a new labelling regulation comparable to the FICR; as in the EU, minimum type sizes have been established.

What about the implications further east in Asia? In June 2014, the Food Labelling Law was published in Japan. The new law consolidates several previous labelling laws and has become the single reference point for all matters relating to food labelling. Although the law does not drastically change specific labelling requirements to be declared on packages, its major difference is that it establishes stricter fines for non-compliant products. For example, the incorrect labelling of durability dates may lead to an extensive recall and/or business suspensions.

Furthermore, if the company does not comply with the order of the authority, the company may be liable for a fine up to JPY 300 million, which is triple what it had been previously. In addition to the company, the person in charge of the labelling may also be fined.

New Food Labelling Standard in Japan

In April 2015 in Japan, the Food Labelling Standard (Cabinet Office Ordinance No.10 of 20 March 2015, as amended) entered into force, with a transition period of 2-5 years. The 749 page long Standard consolidates all labelling requirements to one regulation; these were previously regulated by a multi-level, multi-regulatory control.

It is structured in a user friendly manner, starting with a processed food products section, followed by a fresh food products section and ending with additives sold as such. Each of the three sections are further divided into three sub-sections:

1. Products for sale to the final consumer
2. Business to business sale products
3. Products for sale by non-food business operators.

The major changes that the Standard establishes are:

- Additive listing;
- Allergen labelling requirements;
- Mandatory nutrition labelling requirements.

Additives in Japan used to be declared within the ingredient list following the heading 'ingredients'. Under the new provisions, additives should be declared separately from other normal ingredients using the heading 'additives'.

Allergen labelling has been simplified by using a unified statement, (XXX contained (XXXを含む) for normal ingredients or (XXX originated (XXX由来)) for additives, following the name of the ingredient or additives. All exemptions from allergen labelling have been revoked.

And finally, nutrition labelling has become a mandatory requirement for most processed food products.

A common objective leading to different labels

At first sight, these changes may look very similar to the changes of the FICR. Indeed, the main objectives of the EU FICR regulation and the New Food Labelling Standard in Japan are the same: 1) to promote safety and security of food and the consumer; 2) to help consumers to make an informed choice; and 3) to inform consumers of the nutritional status of products.

While the objectives may be similar, regulations regarding the constituent parts that make up the label differ. For example, a product name in the EU should be a specific name, whilst in Japan it should be a common name. The same carbonated beverage product may be named 'strawberry flavoured carbonated beverage with added sweetener' in the EU, whilst in Japan it is called simply a 'carbonated beverage'. Similarly, for additive declaration sunflower lecithin used as an emulsifier would have to be declared as 'emulsifier (sunflower lecithin)' or emulsifier (E322) in the EU, but in Japan just as 'emulsifier'. On the other hand, country of origin declaration is not mandatory for all imported products but only for those which may mislead the consumer in the EU, but in Japan all imported products must have an origin declaration.

Genetically Modified (GM) food labelling is another example where it differs; in the EU, there are very strict GM labelling provisions. In Japan, GM labelling is only necessary for GM ingredients sold as such and where a GM

ingredient is a major ingredient of a product. For example, tofu made of GM soybeans sold as such needs to be GM labelled, but a product made of tofu with GM soybean does not need to be GM labelled.

Japan's New Food Labelling Standard, published by the Consumer Affairs Agency, is currently only available in Japanese. Leatherhead is creating a searchable database containing everything you need to know about the new Japanese labelling regulations translated into English. The database is brought to life with questions, answers and examples taken directly from the new Standard. Contact legislation@leatherheadfood.com if you would like to know more about the database.

The benefits of local knowledge

So why are there such differences between a region/country's regulations despite starting out with the same objectives? Cultural differences, differences in consumer interest, and historical and political differences all play a part.

Interpreting food legislation is not only about having the appropriate language skills, it is also about understanding the culture and history of the country, as well as any political issues. The multi-lingual regulatory team at Leatherhead Food Research have these skills at their fingertips and deploy them on a daily basis to answer our members' enquiries. Contact the [Regulatory Helpline](#) if you need help interpreting labelling legislation.

How Leatherhead can help

Leatherhead's Regulatory department of over 30 advisors, covering all major international markets are on hand to help with any labelling questions. We can also provide training on food supplement legislation and give advice on additives, flavourings and ingredients, as well as label and formulation checks.

About the author

Mariko Kubo is a Regulatory Manager at Leatherhead Food Research and has comprehensive knowledge in food legislation, covering Japan but also focusing on several international markets including Australia, India, and other countries in the Far East. She has a project management qualification and co-ordinates major multi-country projects on different regulatory subjects. She is fluent in Japanese, English and German. Mariko joined Leatherhead Food Research in April 2009 and has a Bachelor's degree in Public Health Nutrition awarded by Oxford Brookes University.

About Leatherhead Food Research

Leatherhead Food Research provides expertise and support to the global food and drink sector with practical solutions that cover all stages of a product's life cycle from consumer insight, ingredient innovation and sensory testing to food safety consultancy and global regulatory advice. Leatherhead operates a membership programme which represents a who's who of the global food and drinks industry. Supporting all members and clients, large or small, Leatherhead provides consultancy and advice, as well as training, market news, published reports and bespoke projects. Alongside the Member support and project work, our world-renowned experts deliver cutting-edge research in areas that drive long term commercial benefit for the food and drink industry.

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