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Japan

Food and Agricultural Import Regulations and Standards

Revised Allergen Labeling Requirements

2005

Approved by:

Rachel Nelson
U.S. Embassy

Prepared by:

Tetsuo Hamamoto

Report Highlights:

The allergen labeling required by Japan's Ministry of Health, Labor and Welfare requires foods containing any of the five ingredients known to cause significant allergic reactions; wheat, buckwheat, egg, milk and peanuts, to be labeled mandatory. MHLW recommended 20 additional food ingredients to be labeled.

Includes PSD Changes: No
Includes Trade Matrix: No
Unscheduled Report
Tokyo [JA1]
[JA]

1. Outlines of the allergen labeling

Beginning April 1, 2002, the Ministry of Health, Labor and Welfare (MHLW) began enforcing the allergen-labeling scheme on foods containing ingredients known as allergens. MHLW designated five ingredients as allergens subject to labeling.

The five designated foods (wheat, buckwheat, egg, milk and peanut) are subject to mandatory labeling. Foods containing those five foods, or ingredients prepared from them, must be labeled. If a food contains an ingredient made from a designated potential allergen, the label must identify the source. For example, lysozyme extracted from eggs needs to be labeled as "egg white lysozyme" or "lysozyme (from egg)" rather than just "lysozyme."

Labeling is required for the five designated foods even if only a trace amount is present as a result of residues or processing aids. Therefore, it is necessary to confirm and record the use of such trace amounts of designated foods contained in the final foods. Inappropriate labeling of the five designated foods will be treated as a violation of the Food Sanitation Law, and could result in recalls.

Besides the five foods subject to mandatory labeling, under MHLW's allergen-labeling scheme, voluntary labeling is also recommended for 20 other foods that can cause allergic reactions (abalone, squid, salmon roe, shrimp, orange, crab, kiwi fruit, beef, walnut, salmon, mackerel, soybean, chicken, pork, matsutake mushroom, peach, yam, apple, gelatin, and banana). Banana was added to the list on December 27, 2004.

2. Monitoring of the labeling

MHLW will monitor allergen labeling by examining records of the sources of ingredients. From a practical standpoint, this means that importers will need to identify ingredients that may be allergens. For example, animal protein will need to specify that it is "from beef" or "from milk," depending on the situation. MHLW monitoring will include examining the records of importers, ingredient manufacturers, distributors and retailers.

The scope of MHLW's requirements are further detailed in the "Questions & Answers" currently available on the MHLW website in English at: (<http://www.mhlw.go.jp/english/topics/qa/allergies/index.html>) and Japanese at: (<http://www.mhlw.go.jp/topics/0103/tp0329-2b.html#b2>).

3. Examples of labeling of food additives made from the designated foods

The following table, translated from the MHLW website, provides labeling examples for food additives made from some of the five potential allergens.

Name of the designated food	Name of additive	Current labeling (example)	Labeling of the designated foods (example)	Remarks
Milk and milk products	Sodium casein	Sodium casein Casein Na	Casein Na (from milk) Sodium casein (from milk)	
	Lactoferrin concentrate	Lactoferrin	Lactoferrin (from milk)	
	Calcinated	Calcinated whey	Designated food	Considered

	whey calcium	calcium Tricalcium phosphate	labeling is not required	not to contain allergens because of calcination
Egg	Enzymatically modified lecithin	Enzymatically modified lecithin Lecithin Emulsifier	Enzymatically modified lecithin (from egg) Lecithin (from egg) Emulsifier (from egg)	
	Enzymatically decomposed lecithin	Enzymatically decomposed lecithin Lecithin Emulsifier	Enzymatically decomposed lecithin (from egg) Lecithin (from egg) Emulsifier (from egg)	
	Fractionated lecithin	Fractionated lecithin Lecithin Emulsifier Lecithin, fractionated	Fractionated lecithin (from egg) Lecithin (from egg) Emulsifier (from egg) Lecithin, Fractionated (from egg)	
	Non-calcinated calcium (non-calcinated eggshell calcium)	Non-calcinated eggshell calcium Eggshell Ca Eggshell calcium	Non-calcinated eggshell calcium Eggshell Ca Eggshell calcium	No additional labeling is required for designated foods because the current labeling already uses the name "egg"
	Yolk lecithin	Lecithin Egg yolk lecithin Emulsifier	Lecithin (from egg) Egg yolk lecithin Emulsifier (from egg)	
	Calcinated calcium (calcinated eggshell calcium)	Eggshell Ca Eggshell calcium	Designated food labeling is not required	Considered not to contain allergens because of calcination
	Lysozyme	Lysozyme Egg white lysozyme Enzyme	Lysozyme (from egg) Egg white lysozyme Enzyme (from egg)	
	Wheat	Sodium carboxymethyl starch	Sodium carboxymethyl starch Carboxymethyl starch Na	Sodium carboxymethyl starch (from wheat) Carboxymethyl starch Na (from wheat)
Sodium		Sodium starch	Sodium starch	

	starch phosphate	phosphate Starch phosphate Na	phosphate (from wheat) Starch phosphate Na (from wheat)	
	Wheat extract	Wheat extract	Wheat extract	No additional labeling is required for designated foods because the current labeling already uses the name "wheat"
	Carboxypeptidase	Enzyme (no labeling if inactivated)	Enzyme (from wheat)	
	β-amylase	Enzyme (no labeling if inactivated)	Enzyme (from wheat)	
Buckwheat	Buckwheat ash extract	Plant ash extract	Designated food labeling is not required	Considered not to contain allergens because of incineration
	Quercetin	Quercetin Enzymatically decomposed rutin	Quercetin (from buckwheat) Enzymatically decomposed rutin (from buckwheat)	Currently only available as Japanese pagoda tree extract
	Enzymatically modified isoquercitrin	Enzymatically modified isoquercitrin Sugar converted isoquercitrin Enzymatically modified rutin	Enzymatically modified isoquercitrin (from buckwheat) Sugar converted isoquercitrin (from buckwheat) Enzymatically modified rutin (from buckwheat)	
	Enzymatically modified rutin (extract)	Enzymatically modified isoquercitrin (extract) Sugar converted isoquercitrin (extract) Enzymatically modified rutin Sugar converted rutin	Enzymatically modified isoquercitrin (extract, from buckwheat) Sugar converted isoquercitrin (extract, from buckwheat) Enzymatically modified rutin (from buckwheat) Sugar converted rutin	

			(from buckwheat)	
	Buckwheat whole plant extract	Rutin (extract) Buckwheat whole plant extract Flavonoid Rutin	Rutin (extract, from buckwheat) Buckwheat whole plant extract (from buckwheat) Flavonoid (from buckwheat) Rutin (from buckwheat)	