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Report Name: GE Labeling Requirements for Products with Enhanced Nutrition

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Report Highlights:

In most cases Japan's Food Labeling Law does not require genetically engineered (GE) food labeling for highly processed food products that contain no foreign genetic material. However, food items that contain GE products that have had their nutritional values significantly modified by inserted foreign DNA, must be labeled as GE even if no foreign material remains in the product. Currently, this is limited to high-oleic soybeans, stearidonic acid-enhanced soybeans, high-lysine maize, and products derived from these three products that retain the nutritionally enhanced component. In the case of high-oleic soybean oil, no feasible testing methodology to differentiate between oil derived from GE high oleic soybeans and non-GE high oleic soybeans is available.

Labeling Requirements for Specific Genetically Engineered (GE) Products

Japan's Food Labeling Law, overseen by the Consumer Affairs Agency (CAA), dictates labeling requirements for GE food and agricultural products (JA7078). In most cases, if foreign genetic material is not present in the final product, the law does not require GE labeling on the packaging material (JA9055).[1] However, even if no foreign genetic material remains in the final product, the Specific GE Products requirement of the labeling law requires GE products with nutritional values significantly modified by inserted foreign DNA to be labelled as GE. In Japan, most approved GE products have modified agronomic traits and only a limited number of approved GE products have modified nutritional traits. As of October 2020, this requirement only affects products derived from three GE crops, high oleic soybeans, stearidonic acid-enhanced soybeans, and high-lysine maize. The label must also identify the specific GE product. Conversely, the byproducts and coproducts of GE food crops that do not contain traces of the enhanced nutritional element are not subject to this GE labeling requirement.[2] However, if foreign genetic material remains in the byproduct or coproduct, then it must be labeled as GE, see Table 1 for additional detail.

Table 1: Labeling Requirements for GE Oilseed and Corn Products

	Whole Seeds	Meal	Oil
High Oleic Soybean	Soybean (GE (High Oleic))	Soybean Meal (GE or NS)	Soybean Oil (GE (High Oleic))
Stearidonic Acid-Enhanced soybean	Soybean (GE (Stearidonic Acid-Enhanced))	Soybean Meal (GE or NS)	Soybean Oil (GE (Stearidonic Acid-Enhanced))
High-Lysine Maize	Corn (GE (High-Lysine))	Corn Meal (GE (High-Lysine))	Corn Oil
Other GE Soybean	Soybean (GE or NS)	Soybean Meal (GE or NS)	Soybean Oil
Other GE Corn	Corn (GE or NS)	Corn Starch (GE or NS)	Corn Oil
GE Canola	Canola (GE or NS)	Canola Meal (GE or NS)	Canola Oil

Note: NS refers to "non-segregated."

Processed and prepared food products that contain products derived from the nutritionally modified GE crops are also subject to the Specific GE Products labeling requirement. For example, Figure 1 is a food label for a product that contains GE high oleic soybean oil as an ingredient.

[1] Cornstarch is an exception to this rule, it must be labeled as GE even though the foreign material is no longer present.

[2] Examples include, meal derived from high-oleic soybeans, meal derived from stearidonic acid-enhanced soybeans, and oil derived from high-lysine corn.

Figure 1: Example of High-Oleic Soybean GE Labeling

名称 (Name of the Product)	揚げ菓子 (Fried Snack)
原材料名 (Ingredients)	小麦粉、食用植物油（大豆（高オレイン酸遺伝子組み換え））、食塩 (Wheat Flour, Edible Vegetable Oil (**Soybean (GE High Oleic)**), Salt)
内容量 (Net Weight)	250 g
賞味期限 (Best-Before Date)	2022 年 10 月 31 日 (October 31, 2022)

This policy was first developed by the Ministry of Agriculture, Forestry, and Fisheries (MAFF) as part of the Act on Japan Agricultural Standards (JAS) in 2002, but was folded into the Food Labeling Law in 2014 when all food and agricultural labeling requirements were consolidated. For high oleic soybean oil, CAA justifies the required labeling, "…because it is possible to analyze the nutrition composition to detect GE high oleic soybean oil even though it is not possible to detect the protein or target DNA (by PCR test)" (see QI-1 A4-5 on CAA website, in Japanese). In 2002, when the rule was first implemented, this was feasible because the only available high-oleic soybean was genetically engineered. Today, in addition to GE high oleic soybeans, non-GE high oleic soybeans are in commercial production. It is not possible to detect the difference between oils derived from either product.

General GE Labeling Requirements

Food labeling issues, including GE labeling, are administered by CAA under the Food Labeling Law. See Japan Biotechnology Annual JA2019-0219 and the Food and Agricultural Import Regulations and Standards Japan Report JA2019-0216 for more information on Japan's GE Labeling.

On September 19, 2019, CAA announced that genome-edited foods that do not fall into the category of recombinant DNA technique are not subject to the GE Food Labeling Standard under Food Labeling Law (see JA2019-0174).

Vegetable Oil Consumption in Japan

Table 2 shows the consumption volume of leading vegetable oils in Japan. For more information on Japan's vegetable oil market, please see Japan 2020 Oilseeds Report JA2020-0067.

Table 2: GE Labeling Requirements for Leading Vegetable Oils in Japan

	Label Requirement if GE	2019 Consumption
Palm Oil	None[3]	778,649 MT
Canola Oil	None	1,052,689 MT
Soybean Oil	None	499,765 MT
High-Oleic Soybean Oil	Required	0 MT*

Sources: MAFF and * FAS/Japan estimate

[3] GE palm seed varieties or products derived from them are not currently approved in Japan.

Attachments:

No Attachments.