

Voluntary Report – Voluntary - Public Distribution

Date: January 13, 2022

Report Number: JA2022-0004

Report Name: Japan Opens Public Comment Period on Food Additive Labeling Guidelines

Country: Japan

Post: Tokyo

Report Category: Agricultural Situation

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Report Highlights:

Japan's Consumer Affairs Agency invites public comments on its newly proposed guidelines for "additive-free" labeling. The comment period will close on January 21, 2022 (Japan Standard time).

Background

Article 9 of the Food Labeling Standards (available in Japanese only at <https://elaws.e-gov.go.jp/document?lawid=427M60000002010> as *Naikakufurei* #10, 2015) identifies terms and expressions on product labels that would mislead the consumer about product content. Per Article 9, the Consumer Affairs Agency designates these terms as Prohibited Labeling Items. The related Question and Answer document (available only in Japanese as *Shoushokuhyo* #140, Consumer Affairs Agency, Food Labeling Division Director Notification, March 30, 2015 at https://www.caa.go.jp/policies/policy/food_labeling/food_labeling_act/assets/food_labeling_cms101_210317_12.pdf) provides a further guidance on the application of Article 9, but does not clearly indicate how “additive free” labeling can be used. As a result, sometimes, an “additive free” statement is displayed more prominently on food packaging than mandatory labeling components, such as the list of allergenic substances.

In March 2021, the CAA set up a new working group to develop the guidelines for appropriate use of “additive-free” labeling. Following discussions with stakeholders and seven meetings, the CAA drafted guidelines for “additive-free” labeling and specified what would be prohibited under Article 9 of the Food Labeling Standards. In the proposed guidelines (unofficial English translation is attached to the present report), the CAA described 10 typical examples of “additive-free” food labeling and explained how these could be subject to Prohibited Labeling when the proposed guidelines go into effect. On December 22, 2021, the CAA opened the public comment period for the proposed guidelines. The original draft in Japanese can be found at the [e-Gov](#) website.

After the comment period, CAA will review the submitted comments and publish the final guidelines for “additive-free” food labeling.

Comment Submission:

Comments should be submitted **in Japanese** no later than January 21, 2022 (Japanese standard time), by email, fax, or mail. Comments should contain the following information:

1. Commentor’s name (or the name of the corporation or organization, division, etc.)
2. Type of business (optional)
3. Address
4. Phone number
5. Email address (if applicable)
6. Comments with a rationale. If comments exceed 300 words, please attach a summary of the comment.

Email:

i.shokuhin6@caa.go.jp

Use “食品添加物の不使用表示に関するガイドライン案について” (Regarding the Draft Guidelines for Food Additive Non-Use Labeling”) in the email subject line.

Fax:

+81-(0)3-3507-9292

Use “食品添加物の不使用表示に関するガイドライン案について” (Regarding the Draft Guidelines for Food Additive Non-Use Labeling”) as the fax subject line.

Mail:

Send to: 〒100-8958 3-1-1 Kasumigaseki, Chiyoda-ku, Tokyo

To: Consumer Affairs Agency Food Labeling Planning Division

Attn.: Public Comments Team

Mark the front side of the envelope with “食品添加物の不使用表示に関するガイドライン案について”
(Regarding the Draft Guidelines for Food Additive Non-Use Labeling”) in red ink.

Attachments:

[Unofficial Translation of CAA's Proposed Guidelines for Additive-Free Food Labeling.docx](#)