

Voluntary Report – Voluntary - Public Distribution

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Report Name: Japan Intends to Require Allergy Labeling for Walnuts

Country: Japan

Post: Tokyo

Report Category: Tree Nuts, Agricultural Situation

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Report Highlights:

This report replaces and corrects the report published on June 2, 2022. The revision clarifies that Japan's Consumer Affairs Agency (CAA) announced its intention to add walnuts to the list allergens that product manufacturers and importers must include on the label of packaged products containing walnuts, instead of that it will add walnuts to this list. CAA announced its intention, pending a public comment period and cabinet order revision, to add walnuts to list of allergens that product manufacturers and importers must include on the label of packaged products containing walnuts. Currently, CAA strongly recommends including walnuts on the label, but does not require their inclusion. CAA will hold a public comment period prior to making this modification to the Food Labeling Standards, but have not yet announced dates for the comment period.

General Information

Japan’s Consumer Affairs Agency (CAA) announced its intention, pending a public comment period and cabinet order revision, to add walnuts to the list of allergens that food manufacturers and importers must include on product packaging labels. CAA has not yet scheduled a date for the public comment period. Japan’s Food Labeling Standard currently includes walnuts on the list of allergens that it highly recommends food manufacturers and importers include on packaging. Since February 2021, CAA has held three [Advisor Meetings on Food Allergy Labeling](#) to determine if walnuts should be added to the list of allergens with mandated labeling requirements. The advisory panel found that walnuts should be added to the list of allergens required for labeling based on the results of a [new longitudinal study](#) on food allergies in Japan. On June 6, during the [67th Food Labeling Subcommittee](#) meeting, the Cabinet Office’s Consumer Committee reviewed this issue.

Food Allergy Labeling

The Ministry of Health, Labour and Welfare (MHLW) established food allergen labeling standards in 2001 before oversight of the Food Labeling Standard shifted to CAA, a division of the Prime Minister’s Cabinet Office, in 2009. Cabinet Order No.10 currently requires allergy labeling for seven “required ingredients” and highly recommends allergy labeling for 21 “recommended ingredients,” see Table 1.¹

Table 1: Required and Recommended Allergy Labeling Ingredients (as of May 2022)

Categorizations	Items	Reason
Required Ingredients (Mandatory Allergy Labeling)	egg, milk, wheat, crab*, shrimp*	Frequent cases
	buckwheat (<i>soba</i>), peanut	Severe cases
Recommended Ingredients (Highly Recommended Allergy Labeling)	walnut , cashew nut**, almond‡, sesame**, soybean, orange, kiwi fruit, peach, apple, banana+, mountain yam (<i>yamaimo</i>), pine mushroom (<i>matsutake</i>), abalone, squid, mackerel (<i>saba</i>), salmon, salmon roe (<i>ikura</i>), beef, chicken, pork, and gelatin	Less frequent cases

Note: As of June 2022, CAA is planning to elevate walnut from a recommended to required ingredient.

+ Banana added to recommended ingredients in December 2004 (1 year grace period).

* Crab and shrimp added to required ingredients in June 2008 (2 years grace period).

** Cashew nut and sesame added to recommended ingredients in September 2013 (1 year grace period).

‡ Almond added to recommended ingredients in September 2018 (no grace period since it is a recommended labeling).

If CAA classifies an allergen as a required ingredient, and it is present in a food product, then the product manufacturer or importer must include the name of the individual allergen on the packaging. If a required ingredient is included as part of a processed ingredient within the final product, the label must also include the name of the allergen, for example, “cake mix (including wheat, egg, milk).” For recommended ingredients, CAA highly recommends the label include the name of the allergen within the ingredient list. The labeling standard allows for labels to list all existing individual recommended

¹ Direct translation of CAA’s term for required ingredients is “specific ingredients” and for recommended ingredients CAA uses “quasi-specific ingredients.”

ingredients and recommended ingredients collectively. The Food Labeling Standard does not require labels indicate which ingredients are allergens, but product manufactures may choose to do so. See Table 2 for examples of approved labeling of allergens. Please see [JA7078](#) for more details on the Food Labeling Standard.

Table 2: Examples of Approved Food Allergen Labeling in Japan

Ingredients: almond (U.S.), cashew nut , peanut , walnut , Brazil nut, macadamia nut, salt	Individually listed required and recommended ingredients.
Ingredients: cake mix (U.S., Canada) (wheat , sugar, salt), egg , butter (including milk), powdered roasted nuts mix (including peanut), fruit juice, emulsifier	Individually listed, only required ingredients.
Ingredients: cake mix (U.S., Canada) (wheat , sugar, salt), egg , butter (including milk), powdered roasted nuts mix (including peanut , almond , walnut , cashew nut , macadamia nut), fruit juice (including apple , kiwi fruit , strawberry), emulsifier (including soybean)	Individually listed required and recommended ingredients.
Ingredients: cake mix (U.S., Canada), egg , butter, powdered roasted nuts, fruit juice, emulsifier (including wheat , milk , peanut)	Collectively listed, only required ingredients but included at end of list.
Ingredients: cake mix (U.S., Canada), egg , butter, powdered roasted nuts mix, fruit juice, emulsifier (including wheat , milk , peanut , almond , walnut , cashew nut , apple , kiwi fruit , soybean)	Collectively listed, both required and recommended ingredients.
Ingredients: cake mix (U.S., Canada) (wheat , sugar, salt), egg , butter (including milk), powdered roasted nuts mix (including peanut , almond , walnut , cashew nut), fruit juice (including apple , kiwi fruit), emulsifier (including soybean) This product includes the following allergen items: wheat , egg , milk , peanut , almond , walnut , cashew nut , apple , kiwi fruit , soybean	Individually listed, both required and recommended ingredients. In addition, voluntary information provided about allergen information outside of required food labeling.

Note: Yellow highlights are required ingredients that CAA subjects to mandatory allergy labeling. Blue highlights are recommended ingredients that CAA highly recommends for allergy labeling. Green highlight is walnut, which is currently a recommended ingredient, but that CAA plans to move to the required ingredient list.

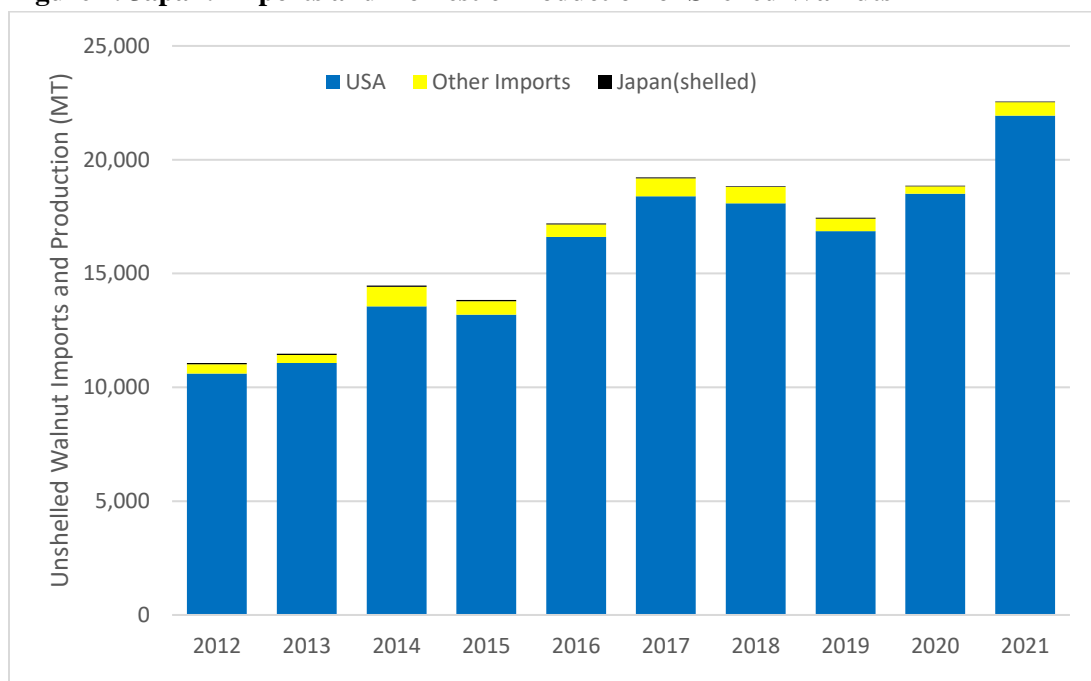
CAA periodically revises the [allergy labeling requirements](#). To do so, CAA relies on the “[Reports on Food Labeling Related to Food Allergies Investigation Project](#),” which it publishes approximately every three years. This series of longitudinal surveys is a compilation of food allergy case reports.

Japanese importers and manufacturers bear sole responsibility for the development of labels compliant with Japanese food labeling regulations, including allergy labeling. There is no legal obligation for U.S. exporters to affix Japanese labels to their products prior to export. Please see [Food and Agricultural Import Regulations and Standards](#) for the current Japanese food labeling requirement.

Production and Trade

There is limited walnut production in Japan, hovering around 35-60 metric tons² (MT) per year. As shown in Figure 1, Japan has roughly doubled walnut imports over the last decade, with most growth coming from U.S. walnuts. In 2021, Japan imported about 21,944 MT of shelled walnuts from the United States. For more details about the tree nuts market in Japan, see [JA2022-0036](#).

Figure 1. Japan: Imports and Domestic Production of Shelled Walnuts



Source: Japan Customs and the Ministry of Agriculture, Forestry and Fisheries

Note: Divide by 3 to convert to shelled walnut, domestic production (unshelled).

Attachments:

No Attachments.

² To convert to shelled walnut, domestic production is divided by 3.