

New Country of Origin Labelling
System for Ingredients Q&A*
(excerpted from the Food Labelling Standard
Q&A (Notice No.410, September 1, 2017))

September, 2017
Food Labelling Division
Consumer Affairs Agency

*Additional Q&As since the previous notification (Jun 29, 2017 version) are highlighted yellow.

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I Ingredients Subject to Labelling

Q 1 What types of processed foods would be subject to the country of origin labelling for ingredients?

Answer

1 For the purposes of provision of information to customers, all processed foods made or processed in Japan are subject to the mandatory country of origin labelling for ingredients.

For imported products (including products, which have been processed domestically after being imported but there have been no substantial changes to them), as previously required, the “country of origin” must be labelled as imported products. The country of origin labelling for ingredients is not required.

2 The following cases do not require the country of origin labelling for ingredients, which is the same procedure for labelling requirements, etc. for ingredients.

- (1) When setting up a facility to provide food and drinks (eating out)
- (2) When selling food products at a place, where such products are made or processed (so called in-store processing)
- (3) When assigning to an unspecified or a large number of people (excluding selling)
- (4) When selling food without containers or packages

In addition, when the area on the container or package where labelling could be placed is 30cm² or less, labelling the country of origin for ingredients can be avoided.

Q 2 What types of ingredients would be subject to the country of origin labelling for ingredients?

Answer

1 The largest ingredient by weight in the ingredients (the most predominant ingredient by weight) is subject to mandatory labelling (which is referred as “subject ingredient”), and the name of that ingredient and its country of origin are required to be labelled correspondingly.

However, though having considered the feasibility of implementation by businesses the subject item is limited as above, it is desirable to include as many ingredients as possible for mandatory labelling with respect to providing information to consumers.

Provided, however, the 22 food groups in Appendix 15-1 and the following items have separate standards, which provide with the ingredients that are subject to mandatory labelling.

- (1) For pickled agricultural products, top four (or three) predominant ingredients, which constitute 5% or more
- (2) For frozen vegetable products, top three predominant ingredients, which constitute 5% or more
- (3) For processed eel products, eel

- (4) For dried bonito flakes, dried bonito
- (5) For rice balls, nori

2 In the case where the country of origin of the most predominant ingredient by weight is labelled (or the information transmitted) under the following laws, the provisions for the country of origin labelling for ingredients in the Food Labelling Standards will not apply for the said ingredient.

- (1) Act on Information Records on Transactions, etc. and Relay of Information on Origin of Rice, etc. (Rice Traceability Act) (Act No. 26 of 2009) (excluding rice cakes described in the Food Labelling Standard Appendix 15-1, (6))
- (2) Act Concerning Liquor Business Associations and Measures for securing Revenue from Liquor Tax (Act No. 7 of 1953)

As of September, 2017, the Production Method and Quality Labelling Standards for Fruit Alcoholic Beverages, etc. (National Tax Agency Notice No. 18 of 2015) have been adopted as labelling standards under (2).

Q 3 Are liquors subject to country of origin labelling for ingredients? If they are, what types of ingredients would be subject to country of origin labelling for ingredients?

Answer

- 1 For liquors, name of ingredient labelling is not obligatory under the Food Labelling Standards, but they are subject to country of origin labelling.
- 2 Specifically, any of the following should be used.
 - (1) Make country of origin column, and corresponding to the largest ingredient by weight in the ingredients (the most predominant ingredient by weight), the country of origin should be labelled.
 - (2) If names of ingredients labelled optionally, it is also possible to label the country of origin using bracket after the name of the corresponding ingredient without making country of origin column.
- 3 In the case of 2(2) above, as labelling of name of ingredients is not obligatory for liquors, the order of labelling is not necessarily descending order of weight, however, regardless of the order of labelling of ingredients in the column for name of the ingredients, the country of origin must be labelled for the largest ingredient by weight in the ingredients (the most predominant ingredient by weight).
- 4 For sake, rice shochu (single type distillation), mirin and fruit wine, under the labelling standards under Act on Information Records on Transactions, etc. and Relay of Information on Origin of Rice, etc. or Article 86-6, paragraph 1 of the Act on Securing of Liquor Tax and Liquor Business Associations, country of origin of ingredients is labelled (information transmission), therefore the provisions on country of origin labelling under the Food Labelling Standards are not applicable.

Q 4 Are ingredients of so-called “ingredient-name-labelled” foods subject to country of origin labelling for ingredients?

Answer

“Ingredient-name-labelling” generally indicates the labelling method for food that uses the name of a specific ingredient as the name of the product or a part of the product, and there is no definition under the Food Labelling Standards, so ingredient-name-labelling itself is not subject to country of origin labelling.

However, if the specific ingredient which is used in the product name is the most predominant ingredient by weight, it is subject to country of origin labelling.

Q 5 Is water also subject to country of origin labelling for ingredients?

Answer

Currently, as water is not labelled in many cases customarily, even if water is labelled at the top of the ingredients column, it is not subject to country of origin labelling. Other than water, for the largest ingredient by weight in the ingredients (the most predominant ingredient by weight), the country of origin must be labelled.

Q 6 Are food additives subject to the country of origin labelling for ingredients?

Answer

1 In the Food Labelling Standards, ingredients and food additives are explicitly distinguished.

Only ingredients are subject to the country of origin labelling for ingredients and food additives are not subject to labelling requirements.

2 Therefore, in the case that a food additive is the most predominant ingredient by weight in a particular food, the said food additive is not required for the country of origin labelling for ingredients. The largest ingredient by weight in the ingredients (the most predominant ingredient by weight) is subject to the labelling requirements.

Any food consisting of only food additives is not required to have the country of origin labelling for ingredients.

3 Countries of origin for diluents (lactose, flour, starch, etc.), which had originally been included in those additives, are not required to be labelled.

Q 7 Under the provisions of 1-(iii) of the name of ingredients column in the chart in Article 3, Paragraph 1 of the Food Labelling Standards, in the case where composite ingredients (ingredients consisting of two or more kinds of ingredients) are labelled by separating the ingredients in the space for name of ingredients, since there is not such a major change in nature of ingredients in that they are merely being mixed, which the ingredient's country of

origin should be labelled?

Answer

- 1 When a composite ingredient is used in producing food, a general name for the composite ingredient is used for country of origin labelling.
- 2 However, under the provisions of 1-(iii) in the name of ingredients column in the chart in Article 3, Paragraph 1 of the Food Labelling Standards, in the case where there is not such a major change in the nature of ingredients in that they are merely being mixed, all the ingredients of the composite ingredients can be separated and labelled.
- 3 In such instance, based on the labelling of ingredients after separation, for the largest ingredient by weight in the ingredients (the most predominant ingredient by weight), the country of origin must be labelled.

<< Example 1: Method by composite ingredient labelling >>

| | |
|-----------------|---|
| Name | Soda pop |
| Ingredients | Sugar preparation (produced in Korea (Sugar, Corn Starch)), Lemon Juice/Citric Acid, Baking Soda, Flavoring |
| Net | 10 g |
| Expiration date | October 1, 2017 |
| How to store | Store away from direct sunlight |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

| | |
|-----------------|---|
| Name | Soda pop |
| Ingredients | Sugar preparation (Sugar, Corn Starch) (produced in Korea), Lemon Juice/Citric Acid, Baking Soda, Flavoring |
| Net | 10 g |
| Expiration date | October 1, 2017 |
| How to store | Store away from direct sunlight |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

<<Example 2: Method of labelling by separation >>

| | |
|-----------------|---|
| Name | Soda pop |
| Ingredients | Sugar (produced in Korea), Corn Starch, Lemon Juice/Citric Acid, Baking Soda, Flavoring |
| Net | 10 g |
| Expiration date | October 1, 2017 |

| | |
|--------------|---|
| How to store | Store away from direct sunlight |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

Q 8 Under the provisions of 1-(iii) in the name of ingredients column in the chart in Article 3, Paragraph 1 of the Food Labelling Standards, in the case where composite ingredients (ingredients consisting of two or more kinds of ingredients) are labelled by aggregating multiple identical ingredients included in the products after separating those in the space for name of ingredients, since there is not such a major change in the nature of ingredients in that they are merely being mixed, how should the ingredient's country of origin be considered?

Answer

Under the provisions of 1-(iii) of the name of ingredients column in the chart in Article 3, Paragraph 1 of the Food Labelling Standards, in the case where multiple identical ingredients are aggregated and labelled, for the most predominant ingredient by weight from looking at the ingredient units labelled after aggregation, country of origin must be labelled.

Q 9 Under the provisions of 2-(i) in the name of ingredients column in the chart in Article 3, Paragraph 1 of the Food Labelling Standards, in the case where the same types of ingredients are summarized and indicated, (such as “Vegetables (○○、△△)”), for which ingredients should the country of origin be labelled?

Answer

1 In the case where the same types of ingredients are summarized and indicated in such a way as “Vegetable (○○、△△),” for easier understanding by consumers or other reasons, for the most predominant ingredient by weight by ingredient unit, country of origin labelling is required.

2 Therefore, even if it is labelled as “Vegetables (○○、△△)” at the very top of the name of ingredients column, due to summarization, when comparing by units of ingredients used, if the ingredient labelled the second or later in the name of ingredients column is the largest by weight among the ingredients, regardless of the order of labelling, the relevant most predominant ingredient by weight should be labelled with the country of origin.

Example) When the weight of Vegetable is greater than Pork, but the weight of Pork is greater than Onion,

Ingredients: Vegetable (Onion, Cabbage, Tomato), Pork (Produced in Country A)

↑
obligatory

Q 10 Under the provisions of 2-(i) in the name of ingredients column in the chart in Article 3, Paragraph 1 of the Food Labelling Standards, in the case where the same types of ingredients are summarized and indicated, if all of the vegetables are domestic, what kind of indication may be used?

Answer

Labelling as in the following example may be used. It does not mean that labelling other than in the following example is not allowed. It is required to use labelling that is easy to understand for consumers.

Examples) When the weight of onion is greater than pork,

Ingredients: Vegetable (Onion (Domestic), Cabbage, Tomato), Pork

Ingredients: Vegetables (Onion (Domestic), Cabbage (Domestic), Tomato (Domestic)), Pork

Ingredients: Vegetables (Domestic (Onion, Cabbage, Tomato)), Pork

Ingredients: Vegetables (Onion, Cabbage, Tomato) (Domestic), Pork

Ingredients: Vegetables (Domestic) (Onion, Cabbage, Tomato), Pork

Q 11 Under the provisions of 2-(ii) in the name of ingredients column in the chart in Article 3, Paragraph 1 of the Food Labelling Standards, in the case where multiple processed foods A and B are separated such as by being wrapped individually, and then one product is constituted by combining those, if the ingredients are labelled by separating those constituent factor processed food A and B, for which ingredient is country of origin labelling obligatory?

Answer

1 Among the most predominant ingredients by weight for constituent factor processed foods A and B respectively, for the most predominant ingredient by weight for the overall product, country of origin labelling is required.

2 If the same ingredient is labelled multiple times for the product as a whole such as in the case where the same ingredient is used for A and B respectively, aggregation is not conducted.

3 As such products,

(1) Product for consumption in the form of A and B being added together by cooking, etc.

(example: noodle with soup)

(2) Both are independent and separate consumption

(example: chocolate and cookies assort)

etc. can be considered, and in the case like (2) and if the ingredients are labelled for each constituent factor, it is desirable to label country of origin for all of the most predominant ingredients by weight for each constituent factor.

Example) A: Chocolate (Cacao Mass 40g, Sugar 25g....)

↑

obligatory

B: Cookie (Flour 35g, Sugar 25g....)

↑

option

- *1 In aggregate, Sugar will be the most predominant ingredient by weight, however country of origin labelling for sugar is not required.
- *2 It is desirable to label production country (country of origin) of Flour in B.

4 However, if food that can be sold individually is made into an assortment as assorted food for seasonal gifts, it is necessary to label individual food as constituent factors. For each individual food, the most predominant ingredient by weight must be labelled for country of origin.

Q 12 Under the provisions of 3 in the name of ingredients column in the chart in Article 3, Paragraph 1 of the Food Labelling Standards, in the case where ingredients are labelled by grouping, such as “Vegetable Oil” or “Starch,” how should the country of origin of ingredients be considered?

Answer

- 1 In the case where multiple ingredients are labelled by grouping under the relevant provisions, the country of origin (production center) should be labelled corresponding to labelling of ingredients that are properly labelled (such as “Vegetable oil” or “Starch”)
- 2 In such instance, for the country of origin (production center) of the original multiple ingredients grouped, label the ingredients from the largest ingredient by weight in the grouped labelled ingredients (such as “Vegetable oil” or “Starch”) in descending order.

Q 13 Under the provisions of 3 of the name of ingredients column in the chart in Article 3, Paragraph 1 of the Food Labelling Standards, in the case where ingredients are labelled by grouping, such as “Fish,” etc., how should the country of origin of ingredients be handled?

Answer

- 1 Fish jelly product, etc. is manufactured with frozen fish paste and fresh fish as main ingredients. In the case where frozen fish paste and fresh fish are used and labelled as “Fish,” etc., labelling method is as follows.
- 2 In the case of fish jelly product manufactured only with fresh fish

<<Example 1: In the case of labelling using a name of country of origin of ingredients column>>

(When all fish is domestic)

| | |
|--|---|
| Name | Fish sausage |
| Ingredients | Fish, Starch, Salt ... |
| Name of country of origin of ingredients | Domestic (Fish) |
| Net | 200 g |
| Expiration date | December 31, 2017 |
| How to store | Store at room temperature away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<<Example 2: In the case of labelling together with names of ingredients>>

(When all fish is domestic)

| | |
|-----------------|---|
| Name | Fish sausage |
| Ingredients | Fish (Domestic), Starch, Salt |
| Net | 200 g |
| Expiration date | December 31, 2017 |
| How to store | Store at room temperature away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<<Example 3: When a type of fish is specified>>

| | |
|-----------------|---|
| Name | Special type boiled fish paste packed in casing |
| Ingredients | Fish (Cod (Domestic), White Croaker, Lizardfish), Toppings (Cheese), Starch, Salt ... |
| Net | 100 g |
| Expiration date | December 31, 2017 |
| How to store | Store at room temperature away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<<Example 4: When all of specified fish ingredients are domestic >>

| | |
|-----------------|--|
| Name | Steamed fish paste |
| Ingredients | Fish ((Domestic) (Cod, White Croaker, Lizardfish)), Starch, Salt ... |
| Net | 100 g |
| Expiration date | December 31, 2017 |
| How to store | Store at room temperature away from direct sunlight. |

| | |
|----------|---|
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |
|----------|---|

3 In the case of fish jelly product, etc. manufactured only from frozen fish paste

<<Example 5: When production center of fish paste is labelled>>

(In the case where fish paste produced in three or more foreign countries, for which the order of predominant ingredients by weight is changed in a certain period, is greater than domestically-produced fish paste)

| | |
|--|---|
| Name | Fish sausage |
| Ingredients | Fish, Starch, Salt ... |
| Name of country of origin of ingredients | Foreign Produced, Domestically Produced (Fish Paste) |
| Net | 200 g |
| Expiration date | December 31, 2017 |
| How to store | Store at room temperature away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<< Example 6: When production center of fresh fish used for fish paste is labelled>>

(In the case where fish paste produced in three or more foreign countries, for which the order of predominant ingredients by weight is changed in a certain period, is greater than domestically-produced fish paste)

| | |
|-----------------|---|
| Name | Fish sausage |
| Ingredients | Fish (Import, Domestic), Starch, Salt ... |
| Net | 200 g |
| Expiration date | December 31, 2017 |
| How to store | Store at room temperature away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<<Example 7: When ingredient is labelled not "Fish" but "Fish Paste">>

(In the case of fish paste produced in three or more foreign countries for which the order of predominant ingredients by weight is used)

| | |
|-----------------|--|
| Name | Fish sausage |
| Ingredients | Fish Paste (Foreign Produced), Starch, Salt ... |
| Net | 200 g |
| Expiration date | December 31, 2017 |
| How to store | Store at room temperature away from direct sunlight. |
| Producer | XX Co., Ltd. |

| |
|---------------------------------------|
| X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |
|---------------------------------------|

<< Example 8: When production center of fresh fish used for fish paste is labelled>>

(In the case of Example 7, and when production center tracing back to fresh fish is labelled)

| | |
|-----------------|---|
| Name | Fish sausage |
| Ingredients | Fish Paste (Fish (Import)), Starch, Salt ... |
| Net | 200 g |
| Expiration date | December 31, 2017 |
| How to store | Store at room temperature away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

4 In the case of fish jelly product, etc. manufactured by mixing frozen fish paste and fresh fish

<< Example 9: When production center of fish paste and fresh fish are labelled>>

(In the case where fish paste produced in America is more predominant ingredient than domestic fresh fish)

| | |
|--|---|
| Name | Fish sausage |
| Ingredients | Fish, Starch, Salt ... |
| Name of country of origin of ingredients | Produced in America (Fish Paste), Domestic (Cod) |
| Net | 200 g |
| Expiration date | December 31, 2017 |
| How to store | Store at room temperature away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<< Example 10: In the case where production center is labelled tracing back to fresh fish >>

(In the case of example 9 and production center is labelled tracing back to fresh fish)

| | |
|-----------------|---|
| Name | Fish sausage |
| Ingredients | Fish (America, Japan), Starch, Salt ... |
| Net | 200 g |
| Expiration date | December 31, 2017 |
| How to store | Store at room temperature away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

| |
|---|
| Q 14 If there are two or more predominant ingredients by weight, which ingredients need country of origin labelling? |
|---|

Answer

It is necessary to label country of origin for all ingredients that are predominant by weight.

II Labelling Methods

Q 15 Where shall we label country of origin for ingredients?

Answer

For general processed food, the country of origin must be labelled either by making a column for name of the country of origin of ingredients in bulk in package or container in accordance with Appended Form 1 in the Food Labelling Standards, or in a manner likewise easy to understand, and then labelling the country of origin corresponding to the name of the ingredients, or by placing brackets corresponding to the name of the labelled ingredients in the column for the name of ingredients, and labelling the country of origin.

Q 16 What is a basic labelling method used for ingredients classified as perishable food, for which supplying countries are labelled in descending order by weight?

Answer

- 1 Any ingredients domestically produced are to be labelled as domestically produced and any imported ingredients are to be labelled of the “countries of origin.”
- 2 In the case of ingredients being domestically produced, in addition to indicating that they are domestically produced (domestic product, Japan, made in Japan, etc.) the following labelling is accepted.
 - (1) If the ingredients are agricultural products:

Any names of prefectures or other names of places generally known can be labelled. The labelling of “domestic” is a general rule for the country of origin labelling for ingredients. If a name of a place is an area that is more restricted than “domestic,” it can be labelled.

For example, the name of a region that is wider than a prefecture (such as “Made in Kyushu” and “Made in Kanto”) can be used in a label as the generally known name of the place.
 - (2) If ingredients are livestock products:

Any names of prefectures or other names of places generally known, where main feeding facility is located, can be labelled.
 - (3) If ingredients are fishery products:

Any names of waters, landing ports, or names of prefectures or other names of places generally known, where the landing port or the main cultivation site is located, can be labelled.
- 3 If ingredients are imported fishery products, the name of the waters can also be labelled with the country of

origin. For example, if fish (Patagonian Toothfish) is caught in the Kerguelen Islands of the French territory in the Indian Ocean and the country of origin is labelled as “France,” this may mislead consumers that the fish was caught in French waters in the EU. In the case where the name of the country confuses the consumers, the name of the waters can also be labelled. For example, “Ingredients: Patagonian Toothfish (France (Indian Ocean)). However, it is not permitted to state only the name of the waters since this may indicate it has been domestically produced.

4 The followings are specific labelling examples.

<<Example 1: Labelling in the country of origin column>>

| | |
|-------------------|---|
| Name | Pork sausage (wiener) |
| Ingredients | Pork, Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans) / Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K), ... |
| Country of Origin | Canada (pork) |
| Net | 150 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10°C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<<Example 2: Labelling in brackets in the ingredients column (Remarks 3: Appended Form 1 in the Food Labelling Standards)>>

| | |
|-----------------|--|
| Name | Pork sausage (wiener) |
| Ingredients | Pork (Canada), Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans) / Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K), ... |
| Net | 150 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10°C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<<Example 3: If labelling in the collective labelling column is not possible, the labelling can be additionally shown somewhere else describing where it is>>

| | |
|-------------------|---|
| Name | Pork sausage (wiener) |
| Ingredients | Pork, Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans) / Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K), ... |
| Country of Origin | Written under the product name |
| Net | 150 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10°C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

| | |
|---------------------------|------------|
| Product Name | XX sausage |
| Country of Origin of Pork | Canada |

<<Inappropriate Labelling Example>>

*In Example 1, if there are several ingredients, it is required to label the ingredient corresponding to the country of origin by adding the brackets after the said country of origin since labelling only the country of origin in the country of origin column may confuse which ingredient is derived from the said country of origin.

inappropriate



| | |
|-------------------|---|
| Name | Pork sausage (wiener) |
| Ingredients | Pork, Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans) / Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K), ... |
| Country of Origin | Canada |
| Net | 150 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10°C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

Q 17 What is labelling method used for the case where ingredients from multiple countries of origin are mixed?

Answer

1 When ingredients from two or more countries are mixed, the country of origin must be labelled in descending

order from the heaviest ingredient by weight in the ingredients.

<<Example 1: The country of origin is labelled in descending order from the heaviest ingredient by weight in the ingredients>>

| | |
|-----------------|--|
| Name | Pork sausage (wiener) |
| Ingredients | Pork (Canada, America), Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans)/Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K) ... |
| Net | 150 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10 deg. C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

2 When mixing ingredients from three or more countries, the major ingredients can also be labeled by weight in the ingredients for two or more countries, and then the other country of origin can be labelled as “Other.”

<<Example 2: When there are three or more countries of origin and all are labelled>>

| | |
|-----------------|--|
| Name | Pork sausage (wiener) |
| Ingredients | Pork (Canada, America, Denmark, Japan), Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans)/Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K) ... |
| Net | 150 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10 deg. C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<<Example 3: When two or more countries of origin are labelled and others are labelled “Other”>>

| | |
|-----------------|--|
| Name | Pork sausage (wiener) |
| Ingredients | Pork (Canada, America, Others), Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans)/Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K) ... |
| Net | 150 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10 deg. C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

3 When domestic ingredients and foreign ingredients are mixed as well, calculation is done in country units. In

other words, when ingredients of three or more countries are mixed and then two or more countries are labelled, other countries of origin may be labelled as “Other.”

<<Example 4: When ingredients from Kagoshima Prefecture (50%), and Miyazaki Prefecture (30%) are mixed with ingredients of Canada (20%) and used >>

appropriate
○

| | |
|-----------------|--|
| Name | Pork sausage (wiener) |
| Ingredients | Pork (Domestic, Canada), Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans)/Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K), ... |
| Net | 150 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10 deg. C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

appropriate
○

| | |
|-----------------|---|
| Name | Pork sausage (wiener) |
| Ingredients | Pork (Domestic (Kagoshima Pref., Miyazaki Pref.), Canada), Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans)/Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K) ... |
| Net | 150 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10 deg. C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

appropriate
○

| | |
|-----------------|--|
| Name | Pork sausage (wiener) |
| Ingredients | Pork (Kagoshima Pref., Miyazaki Pref., Canada), Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans)/Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K) ... |
| Net | 150 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10 deg. C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<<Inappropriate Labelling Example>>

* Even if ingredients from Kagoshima Prefecture, Miyazaki Prefecture, Canada and America are mixed and used, labelling “Kagoshima Pref., Miyazaki Pref., Other” is not acceptable as only one country (Japan) is labelled from the viewpoint of country units.



| | |
|-----------------|--|
| Name | Pork sausage (wiener) |
| Ingredients | Pork (Kagoshima Pref., Miyazaki Pref., Other), Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans)/Seasoning (Amino Acid, etc.) Phosphoric Salt (Na, K) ... |
| Net | 150 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10 deg. C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

Q 18 Allergy labelling or genetic recombination labelling is sometimes included in the column for name of ingredients, so is there any priority order for country of origin labelling, allergy labelling or genetic recombination labelling?

Answer

1 In Food Labelling Standards, there is no special provision about order of country of origin labelling, allergy labelling or genetic recombination labelling, however, we consider that allergy labelling that prevents occurrence of health hazards for consumers who have specific food allergies should be labelled first, with priority over other labelling.

Moreover, it is desirable to increase visibility of labelling relating to specific ingredients, etc. subject to allergy labelling, so that consumers who have specific allergies can judge properly.

2 Specific example of labelling is as follows. (xx is allergy labelling, xx is genetic recombination labelling, xx is the country of origin labelling)

<<Example 1: When the country of origin is labelled for tofu salad>>

| | |
|-----------------|---|
| Name | Tofu Salad |
| Ingredients | Tofu (<u>contains soybeans: non-genetic recombinant</u>) (<u>Domestically Produced</u>), Lettuce, Tomato, Cucumber, ... |
| Net | 300 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10 deg. C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<< Example 2: When the country of origin is labelled for tsukudani>>

| | |
|-----------------|---|
| Name | Tsukudani |
| Ingredients | Soy Sauce (<u>contains Soybeans, Wheat, Domestically Produced</u>), Sea Cabbage, Vegetable Fat and Oil, Red Pepper, Sugars (Sugar, Malt Syrup), ... |
| Net | 100 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10 deg. C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<< Example 3: When the country of origin is labelled for macaroni salad>>

| | |
|-----------------|---|
| Name | Macaroni Salad |
| Ingredients | Macaroni (<u>produced in Italy</u>), Mayonnaise, Cucumber, Carrot, Onion (<u>partially contains Wheat, Dairy Product, Egg, Soybeans</u>) |
| Net | 100 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10 deg. C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<< Example 4: When the country of origin is labelled for corn snack>>

| | |
|-----------------|--|
| Name | Corn snack |
| Ingredients | Corn Grits (Corn (<u>America, genetic recombination not separated</u>)), Sugar, Salt/Emulsifier, Calcium Carbonate ... |
| Net | 300 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10 deg. C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

Q 19 Is it possible to label country of origin for ingredients other than with name of country?

Answer

1 For domestic products, in place of labelling as domestically produced, the name of prefecture or other widely-known place name may be used for labelling as a more-limited and specific area.

Specifically,

- (1) Name of county (e.g., Chichibu County)
- (2) Name of island (e.g., Yakushima Island)

- (3) Widely known historic name of region (e.g., Tamba, Tosa, etc.)
- (4) Another widely-known historic name of region (e.g., Shinshu, Kosshu, etc.)
- (5) Other widely-known place name (e.g., Kyushu, Kanto, Boso (region name)), etc. can be considered.

In addition, in the case of fishery products, name of waters or landing ports can be labelled.

2 In the case of imported products, as it is prescribed that the “country of origin” must be labelled, therefore except for the case where “All Inclusive Labelling” is permitted (see Q&A 31), other labelling cannot be used. The area name can be stated together with the name of the country of origin.

In addition, in the case of imported fishery products, the name of the waters together with the country of origin can be added.

Q 20 Is it possible to label country name using “abbreviation,” etc., for country of origin labelling for ingredients? Is it possible to label America as USA or US?

Answer

- 1 As food labelling is for the purpose of provision of information contributing to choice of products by consumers, labelling must be conducted accurately in Japanese, using easily understandable terms.
- 2 Therefore, to label “produced in America” as USA or US is not permitted as a general rule. (except for in the case of Q21 or Q33).

[Examples of permitted labels for country of origin labelling]

America, United States of America, Australia, China, People’s Republic of China

Q 21 Is it possible to label country of origin for ingredients using marks that indicate the country of origin?

Answer

- 1 Country of origin labelling with marks can be done in a way that is easy to understand for consumers, to prevent misunderstanding, by such methods as labelling outside the collective labelling column upon specifying:
 - (1) ingredients for country of origin labelling,
 - (2) the fact of labelling, with a mark,
 - (3) and the labelling location with a mark
 in the country of origin column inside the collective labelling column, after labelling mark and country of origin corresponding to the relevant mark on container or package.
- 2 In such instance, for marks, the “3-letter country name codes,” etc. in “Country Name Code” under JIS X 0304:2011 (ISO 3166-1:2006) could be considered.

<<Example: Labelling with mark>>

| | |
|--|--|
| Name | Wiener sausage |
| Ingredients | Pork, Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans)/Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K) ... |
| Name of country of origin of ingredients | Production center of Pork is stated at the right of expiration date at the bottom of the container, using the mark shown under this collective labelling column. |
| Solid content | 150 g |
| Expiration date | Stated at the bottom of container |
| How to store | Store away from direct sunlight |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

(Outside the column, lower part)

| |
|--------------|
| JPN: Japan |
| USA: America |
| CAN: Canada |

(bottom of container)

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Q 22 For largest ingredient by weight in the ingredients (the most predominant ingredient by weight), under the provisions of Article 7 of the Food Labelling Standards, specific country of origin name and ingredient ratio used are labelled by stressing those, but is the country of origin labelling necessary separately within the collective labelling column?

Answer

Even in the case where country of origin is stressed and indicated outside the collective labelling column, for country of origin labelling, it is necessary to indicate in the column of country of origin inside collective labelling or next to the name of the corresponding ingredients using brackets in accordance with the labelling method.

When it is difficult to indicate country of origin inside collective labelling, label can be another place, if the place for labelling is indicated in the country of origin column.

Q 23 In the case of labelling the country of origin for ingredients within the collective labelling column, is it necessary to write ingredient ratio used as well, under the provisions of Article 7 of the Food Labelling Standards?

Answer

1 In the case of country of origin labelling under the provisions of the chart in Article 3, Paragraph 2 of the Food Labelling Standards (in other words, by the method of labelling shown in Q16 and afterward), including the case where the second largest ingredient by weight and below is labelled optionally, labelling of percentage of use is not necessary.

2 In the case of labelling only the name of production center that is desired to be stressed optionally inside collective labelling, or in the case of emphasizing the label of a specific production center outside collective labelling, due to applicability of labelling on use of specific ingredients under Article 7 of the Food Labelling Standards, it is necessary to label the percentage in a place nearby the relevant emphatic label or with the name of the ingredient in collective labelling. However, if the percentage is 100%, the labelling of the percentage may be omitted.

<<Example: When, for ingredient XX, a domestic ingredient makes 70%, ingredients produced in Canada account for 20%, and ingredients in America account for 10%>>

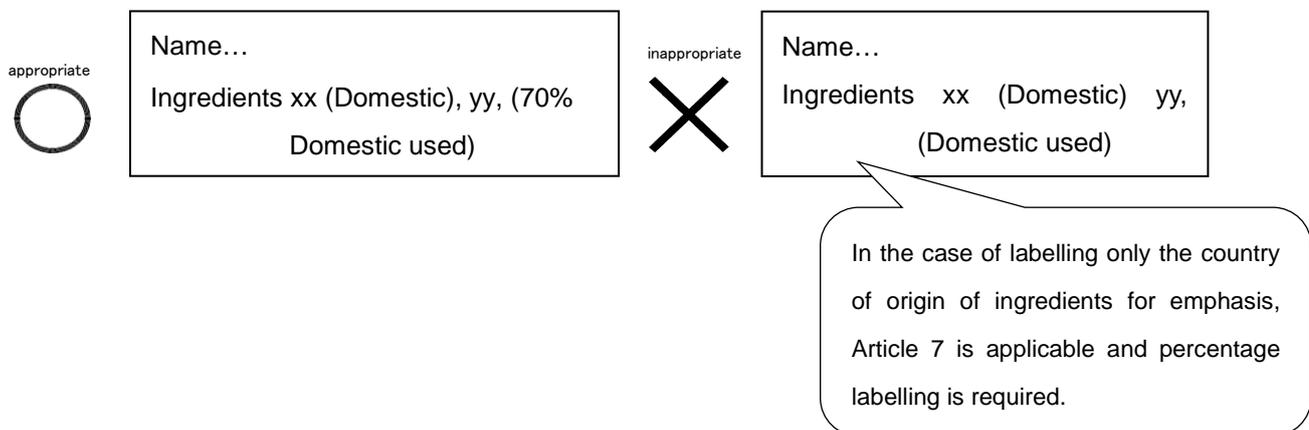
(1) Under the provisions of Article 3, labelling for all production centers of ingredients = outside the application of Article 7

(In common with ingredients for which labelling is obligatory, and ingredients not subject to labelling)



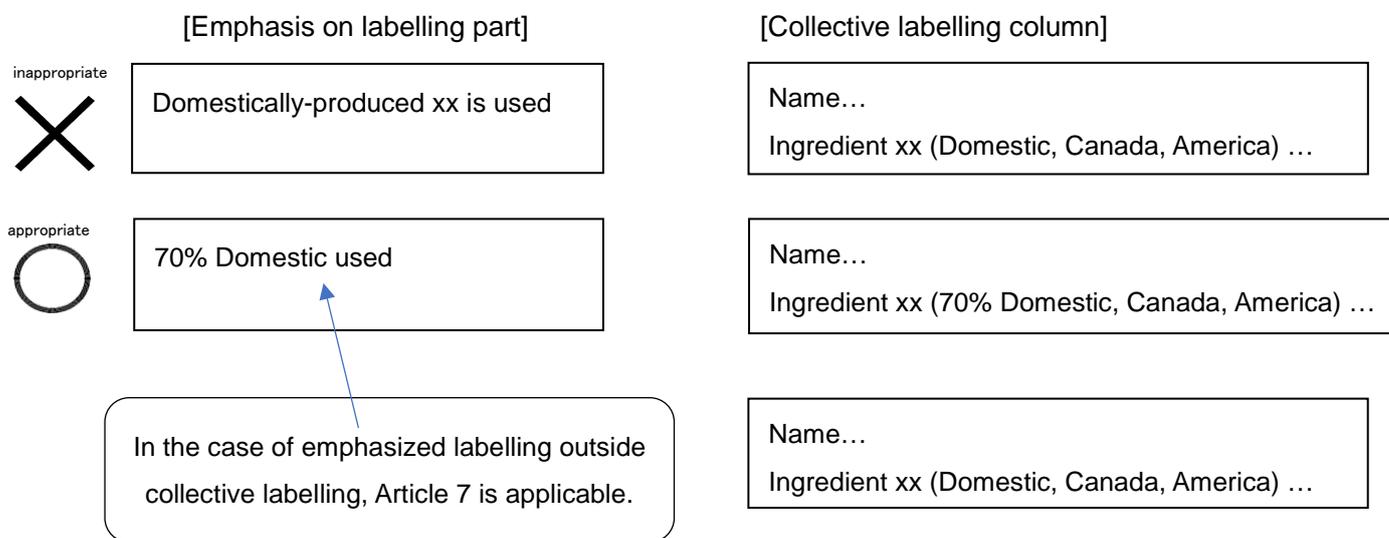
(2) In addition to ingredients for which labelling inside collective labelling is obligatory, where only the country of origin of a specific ingredient is optionally emphasized = Article 7 is applicable.

(In the case of ingredients for which labelling is not obligatory)



(3) Outside collective labelling, country of origin of specific ingredient is emphasized = Article 7 is applicable.

(In common with ingredients for which labelling is obligatory, and ingredients not subject to labelling)



Q 24 In addition to the most predominant ingredient by weight subject to country of origin labelling, if labelling of country of origin name is desired for the fifth most predominant ingredient as an option, is it possible not to label country of origin for the second, third and fourth most predominant ingredients?

Answer

In the case of labelling the country of origin optionally for ingredients other than the most predominant ingredient by weight, for consumers not to misunderstand that relevant country of origin labelling is for the ingredients between the most predominant one and the specified one (in the case of this question, the second, third and fourth most predominant ingredients), we consider it more desirable to have country of origin labelling for those ingredients as well, however, if the labelling is done in the proper position, there is no problem with labelling only the specific ingredient (in the case of this question, only for the fifth most predominant ingredient).

Q 25 In the case where there is one ingredient and labelling of the ingredient name is omitted, how should the country of origin be labelled?

Answer

It is necessary to label the country of origin corresponding to the name of ingredient.

Specifically, please label the country of origin corresponding to the name of the ingredient by such means as creating a country of origin name column and labelling the names of ingredients by adding brackets after the name of the country of origin, etc.

In addition, it is also possible to label the country of origin without creating a country of origin name column,

but by adding brackets after the names of ingredients in the ingredient name column.

<<Example 1: When ingredient name column is omitted>>

| | |
|--|---|
| Name | Flour |
| Name of country of origin of ingredients | Domestic (wheat) |
| Net | 1kg |
| Expiration date | March 31, 2018 |
| How to store | Store at room temperature in a cool dry place. |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<<Example 2: When ingredient name column is not omitted>>

| | |
|-----------------|---|
| Name | Flour |
| Ingredients | Wheat (domestic) |
| Net | 1kg |
| Expiration date | March 31, 2018 |
| How to store | Store at room temperature in a cool dry place. |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

III And/Or Labelling

Q 26 Which case is permitted for the “And/Or Labelling” (labelling prescribed in 1-(v)(a) of the processed food other than imported food column in the chart in Article 3, Paragraph 2 of the Food Labelling Standards)?

How long can source documents for the And/Or Labelling be used as evidence?

Answer

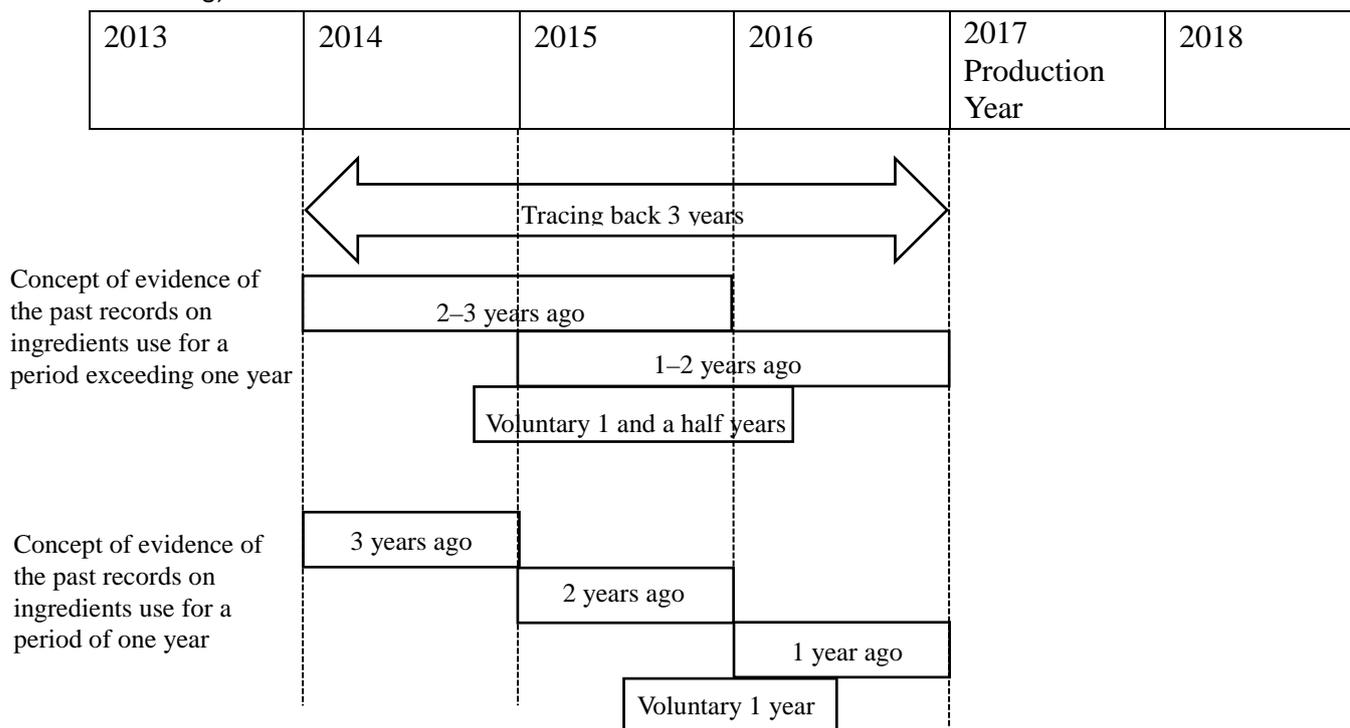
1 And/Or Labelling is a method listing potential supplying countries as countries of origin of ingredients in descending order by weight based on the past records or the future plans on ingredients use for a defined period of time in the past or in the future, whose country names will be connected with “or.”

2 For the purpose of providing information to consumers, the labelling of supplying countries in descending order by weight is a general rule. The And/Or Labelling is, however, permitted only if the order by weight and supplying countries of a product are expected to be changed within a year from the labelling (date of production) and it is going to be difficult to label supplying countries in descending order by weight based on the supplying countries in descending order by weight in the past records over a defined period of time (or based on the usage plans by supplying country for a defined period of time in the future for a new product, or if the change of the country of origin for the ingredients is very likely).

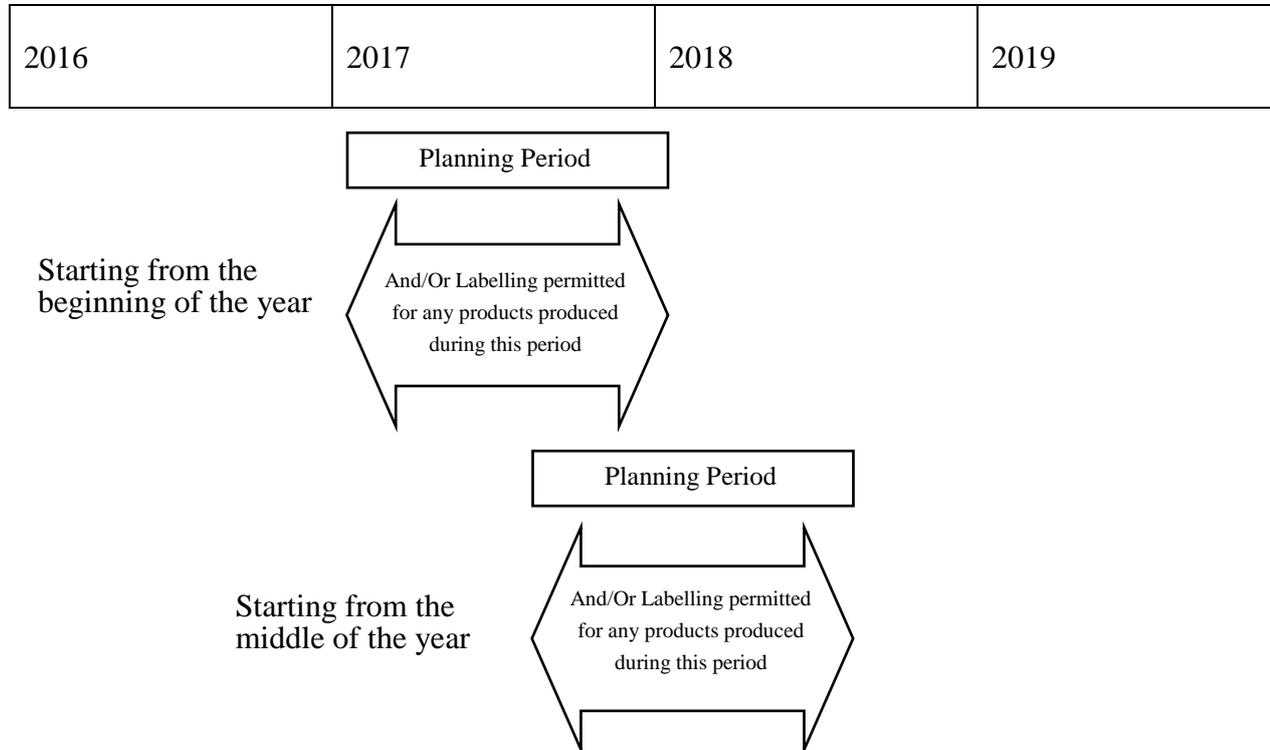
In addition to the above, retention of the following documents is a required condition.

- (1) Documents indicating the following periods are from when to when (defined by a business operator).
 - (i) One year period (such as year of production and fiscal year of production) in which a product is labelled (date of production)
 - (ii) A defined period of time for the past records on ingredients use by supplying country or a defined period of time in the future for usage plans by supplying country (referred as a “defined period of time in the past or in the future” hereafter)
 - (2) Documents indicating that the changes of the order of supplying countries by weight and the changes of supplying countries over a defined period of time in the past or in the future.
 - (3) Documents indicating the calculation units (per one product, common unit for controlling ingredients, etc.) used in the past records on ingredients use by supplying country over a defined period of time in the past.
 - (4) Documents indicating the order of the ingredient ratio by country of origin over a defined period of time in the past or in the future.
- 3 The past records on ingredients use by supplying country over a defined period of time must cover at least a period of one year within three years prior to the year (year of production, fiscal year of production, etc.) in which a product is labelled (date of production). (See Example 1).
- 4 As a general rule, the And/Or Labelling is based on the past records on ingredients use by supplying country over a defined period of time. In the cases of a new product or of the change of the supplying countries for the ingredients being very likely, where the past records on ingredients use by supplying country cannot be used, the And/Or Labelling should be used based on the future usage plans for ingredients by supplying country over a defined period of time.
- The future usage plan over a defined period of time by supplying country must be a plan set one year or less from the scheduled start date of production based on the said plan. The And/Or Labelling based on the said plan is not permitted for a product made outside the planning period (See Example 2).
- 5 The And/Or Labelling is one of the exceptions. Even if a supplying country is expected to be changed, if it is not considered difficult to list the names of supplying countries in descending order by weight such as a case where each label can be changed accordingly or a package itself can be easily changed, the And/Or Labelling is not applicable.
- 6 Site inspections to businesses by government or local government will confirm whether or not the labelling is properly implemented for the country of origin labelling for ingredients. Interviews will be conducted to check the reasons for the And/Or Labelling, etc. Source documents, which should be retained as a required condition, are also inspected.

(Example 1: Concept of “the past records on ingredients use,” which can be used as evidence for And/Or Labelling)



(Example 2: Labelling using Usage Plans)



Q 27 What is a basic labelling method used for the And/Or Labelling?

Answer

1 The And/Or Labelling is a method listing potential supplying countries as countries of origin for the ingredients in descending order by weight based on the past records on ingredients use, whose country names will be connected with “or.”

For example, if labeled “Country A or Country B”

(1) It means the following four approaches as a country of origin: “Country A only,” “Country B only,” “the order of Country A and Country B,” and “the order of Country B and Country A.”

This labelling means the use of the ingredient can only be supplied from within the scope of labelled countries. It is not permitted to use an ingredient whose supplying country is not labelled. Therefore, if the actual product includes an ingredient supplied by Country C, the labelling of “Country A or Country B” cannot be used.

(2) This indicates that in the past records on ingredients use, the usage portion of ingredients supplied by Country A is greater than the usage portion of ingredients supplied by Country B.

The order of the labelling can only be the order based on the past records on ingredients use for periods illustrated in Q 26 of this Q&A. For example, if it is considered difficult to label supplying countries in descending order by weight based on the future usage plan on ingredients use, the order of countries should be listed based on the most similar past records on ingredients to the situation of the future usage plans

2 If there are three or more countries of origin for an ingredient, the third country and beyond can be labelled as “others,” which is the same procedure for labelling supplying countries in descending order by weight.

For example, if labelling “Country A or Country B or Others,” this indicates that there are 3 or more supplying countries in the past records on ingredients use, and the descending order by weight for the first two countries would be Country A and Country B, with the ingredient supplied by Country A having a greater percentage.

3 In order to avoid misleading consumers, it is always required to include a warning to indicate that such labelling is based on the past records on ingredients use on the container or package, together with the country of origin labelling. (See Q 36 of this Q&A)

<<Example 1: A case of two foreign supplying countries>>

| | |
|-----------------|---|
| Name | Pork sausage (wiener) |
| Ingredients | Pork (Canada or USA), Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans) / Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K), ... |
| Net | 150 g |
| Expiration date | December 31, 2017 |

| | |
|--------------|---|
| How to store | Store at 10°C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

*Countries of origin for pork and the order are based on the past records on ingredients use in 2015

<<Example 2: A case of two supplying countries including Japan>>

| | |
|-----------------|---|
| Name | Pork sausage (wiener) |
| Ingredients | Pork (USA or Domestic), Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans) / Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K), ... |
| Net | 150 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10°C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

*Countries of origin for pork and the order are based on the past records on ingredients use over a two-year period since 2014

<<Example 3: A case of three supplying countries>>

| | |
|-----------------|--|
| Name | Pork sausage (wiener) |
| Ingredients | Pork (Canada or USA or Denmark), Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans) / Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K), ... |
| Net | 150 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10°C or below |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

*Countries of origin for pork and the order are based on the past records on ingredients use of last year

<<Example 4: A case of three or more supplying countries using "others">>

| | |
|-------------|--|
| Name | Pork sausage (wiener) |
| Ingredients | Pork (Canada or USA or Others), Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans) / Seasoning (Amino Acid, etc.), |

| | |
|-----------------|---|
| | Phosphoric Salt (Na, K), ... |
| Net | 150 g |
| Expiration date | December 31, 2017 |
| How to store | Store at 10°C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

*Countries of origin for pork and the order are based on the past records on ingredients use over the period from September 2015 to August 2016

Q 28 “Is And/Or Labelling” possible to use in country of origin labelling using name of prefectures?

Answer

1 In the case where the ingredients are solely domestic, And/Or Labelling using prefectural name, etc., such as “X Pref. or Y Pref” may be used. About conditions for permitting And/Or Labelling, concept of country unit in Q26 and Q27 is applicable.

2 However, when Country A-produced ingredients and domestic ingredients are used together, and use volume of Country A-produced ingredients is always greater than the domestic ingredients, and besides it cannot be judged that labelling by country in descending order of weight is difficult, And/Or Labelling such as “Country A or X Pref. or Y Pref.” cannot be used based on the fact that the order by weight for X Pref. and Y Pref. changes for domestic ingredients.

Labelling as “Country A, Domestic (Pref. X or Pref. Y)” is possible. However, in such instance, a warning to the effect that the labelling is based on past records or future plans for ingredient use by the production center for a defined period of time, and storage of source documents in which are described the past records or the future plans for ingredients use by production center for a defined period of time for ingredients for each prefecture is required.

Q 29 When the And/Or Labelling is conducted based on the past records or the future plans on ingredients use by supplying country for a defined period of time, how can we list a supplying country, whose ingredient ratio used in the specific product is significantly small, to prevent information from misleading consumers?

Answer

1 The And/Or Labelling is conducted based on the past records or the future plans on ingredients use by supplying country for a defined period of time. It is, thus, necessary to prevent consumers from any

misunderstanding, in the case of the ingredient ratio used in the specific product being significantly small.

For that purpose when obtaining an ingredient ratio based on the past records or the future plans on ingredients use, it is mandatory to label as follows for any supplying countries, of which the ingredient ratio used in the specific product is significantly small.

- (1) “Ingredient ratio used in the specific product is significantly small” means a percentage composition of “less than 5%.”
- (2) It is required to label “less than 5%” by adding the brackets after the country of origin for any country of origin, whose usage percentage per past records on ingredients use is less than 5% , which is applied to the And/Or Labelling used in the All Inclusive Labelling + And/Or Labelling, and “production country labelling for semi-processed ingredients.”
- (3) A warning is required to be shown that the percentage composition is based on the past records or the future plans on ingredients use by supplying country for a defined period of time.

<<Example: A case of And/Or Labelling having a country of origin, whose percentage composition is less than 5%>>

| | |
|-----------------|--|
| Name | Dark Soy Sauce (Naturally Brewed) |
| Ingredients | Soybeans (USA or Domestic (less than 5%)), Wheat, Salt |
| Net | 400ml |
| Expiration date | March 30, 2018 |
| How to store | Store at room temperature away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

*The order of countries of origin and portion for soybeans are based on the records on ingredients use in 2015

2 In addition,

- (1) Regarding to the All Inclusive Labelling (such as “import”) in the All Inclusive Labelling + And/Or Labelling, it is mandatory to label “less than 5%” when the total ratio of bundled ingredients is less than 5%.
- (2) The “less than 5%” labelling is not required for the “others” in the And/Or Labelling.
- (3) The “less than 5%” description is not necessary to the label of countries of origin of ingredients in descending order by weight.

Q 30 In the case where ingredients from multiple countries of origin are added to the tank to manufacture products, in calculation the ratio of once-used country of origin will never be zero, so how should those be labelled?

Answer

- 1 For example, in the case of manufacturing products by adding a new ingredient to products manufactured in the past such as “mother“ for vinegar, it is thought that in some cases the ingredients of the country of origin used

in the past will never be calculated to be zero.

2 As it is considered that there is no great need to continue labelling the country of origin because it will not be zero in calculation, as in the example in 1, labelling of the relevant country of origin can be omitted as of the time when the percentage of the ingredient becomes “less than 5%.”

It must be noted that, for the country of origin for which the ingredient percentage comes to less than 5% at one time, if ingredients from the same country of origin are added again and then the aggregate total percentage becomes 5% or greater, labelling may not be omitted.

IV All Inclusive Labelling

Q 31 Which case is permitted for the “All Inclusive Labelling” (labelling prescribed in 1-(v)(b) of the processed food other than imported food column in the chart in Article 3, Paragraph 2 of the Food Labelling Standards)?

How long can source documents for the All Inclusive Labelling be used as evidence?

Answer

1 The All Inclusive Labelling is a labelling method for bundling foreign supplying countries together in a category classed as “import.”

2 For the purpose of providing information to consumers, the labelling of supplying countries in descending order by weight is a general rule. The All Inclusive Labelling is, however, permitted only if the order by weight and supplying countries of a product are expected to be changed for the labelling of the ingredient originating from three or more foreign countries within a year from the labelling (date of production) and it is going to be difficult to list supplying countries in descending order by weight based on the supplying countries in descending order by weight in the past records over a defined period of time (or based on the usage plans by supplying country for a defined period of time in the future for a new product, or if the change of the country of origin for the ingredients is very likely).

In addition to the above, retention of the following documents is required.

- (1) Documents indicating the following periods are from when to when (defined by a business operator).
 - (i) One year period (such as year of production and fiscal year of production) in which a product is labelled (date of production)
 - (ii) A defined period of time in the past or in the future
- (2) Documents indicating that the changes of the order of supplying countries by weight and the changes of supplying countries over a defined period of time in the past or in the future.
- (3) Documents indicating the calculation units (per one product, common unit for controlling ingredients, etc.) used in the past records on ingredients use by supplying country over a defined period of time in the past.

3 The past records on ingredients use by supplying country over a defined period of time must cover at least a period of one year within three years prior to the year (year of production, fiscal year of production, etc.) in which a product is labelled (date of production). (See Example 1).

4 As a general rule, the All Inclusive Labelling is based on the past records on ingredients use by supplying country over a defined period of time. In the cases of a new product or of the change of the supplying countries for the ingredients being very likely, where the past records on ingredients use by supplying country cannot be used, the All Inclusive Labelling should be used based on the future usage plans for ingredients by supplying country over a defined period of time.

The future usage plan over a defined period of time by supplying country must be a plan set one year or less from the scheduled start date of production based on the said plan. The All Inclusive Labelling based on the said plan is not permitted for a product made outside the planning period (See Example 2).

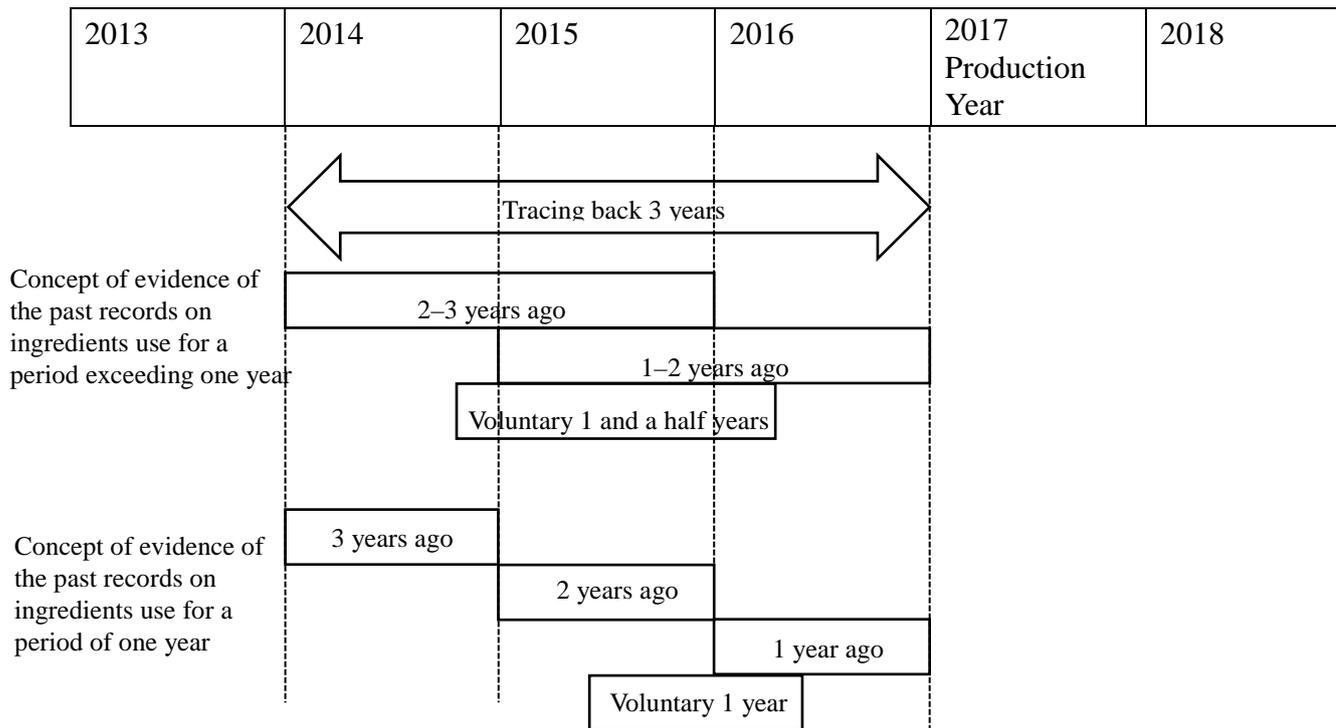
5 The All Inclusive Labelling is one of the exceptions. Even if a supplying country is expected to be changed, if it is not considered difficult to list the names of supplying countries in descending order by weight such as a case where each label can be changed accordingly or a package itself can be easily changed, this labelling is not applicable.

6 The "ingredient originating from three or more foreign countries" means several imported countries from the Northern and Southern Hemisphere depending on the season so that a particular agricultural product, for example, could be procured consistently throughout the year. As the result, it is assumed that the usage status by supplying country could switch between "only countries in the Northern Hemisphere," "combined countries in the Northern and Southern Hemispheres," and "only countries in the Southern Hemisphere."

It may not be considered difficult to list the names of supplying countries in descending order by weight, in the case where ingredients are intentionally procured from several countries only for a short period of time in order to switch or combine countries of origin only for the purpose of the All Inclusive Labelling even though the procurement circumstances for the ingredients allow listing of the names of supplying countries in descending order. (See Example 3)

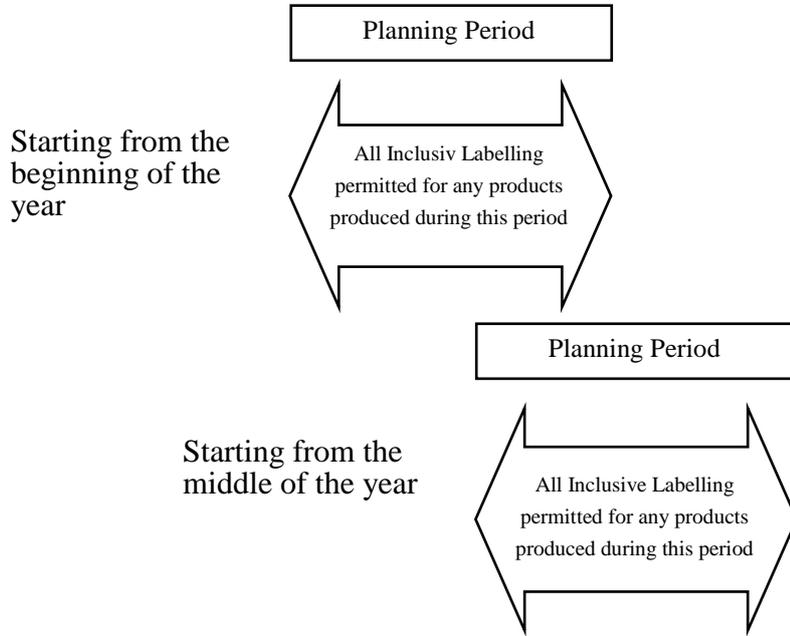
7 Site inspections to businesses by government or local government will confirm whether or not the labelling is properly implemented for the country of origin labelling for ingredients. Interviews will be conducted to check the reasons for the All Inclusive Labelling, etc. Source documents, which should be retained as a required condition, are also inspected.

(Example 1: Concept of “the past records on ingredients use,” which can be used as evidence of All Inclusive Labelling)



(Example 2: Labelling using Usage Plans)

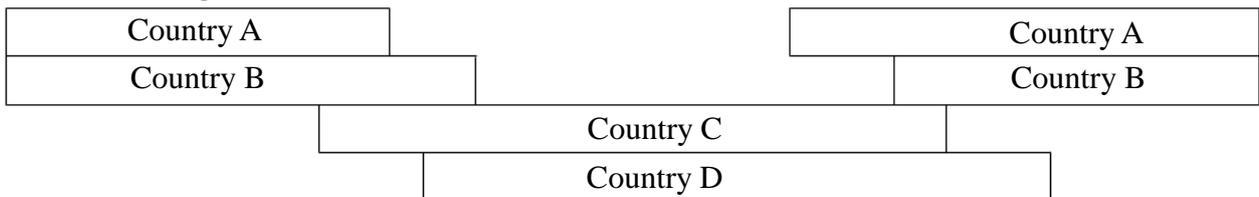
| | | | |
|------|------|------|------|
| 2016 | 2017 | 2018 | 2019 |
|------|------|------|------|



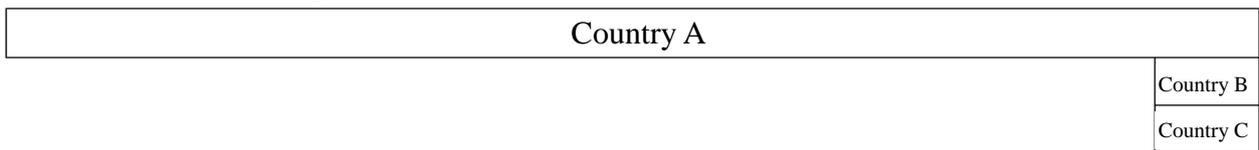
(Example 3)

| | | | | | | | | | | | |
|-----|-----|-----|-----|-----|------|------|-----|-----|-----|-----|-----|
| Jan | Feb | Mar | Apr | May | June | July | Aug | Sep | Oct | Nov | Dec |
|-----|-----|-----|-----|-----|------|------|-----|-----|-----|-----|-----|

(An envisaged case)



(A case not envisaged)



Q 32 What is a basic labelling method used for the All Inclusive Labelling?

Answer

1 The All Inclusive Labelling is a labelling method for bundling foreign supplying countries together in a category classed as “import.”

The labelling as "import" indicates that, based on the past records or the future plans on ingredients use by supplying country for a defined period of time, the order by weight and supplying countries of three or more foreign countries are expected to be changed or switched within a year from the labelling (date of production).

The labelling as “import, domestic” indicates that, according to the actual countries of origin for the ingredient, the imported products (total) are greater by weight than domestic products.

2 In addition to “import,” it is possible to label as “foreign product,” “foreign,”etc.

<<Example 1: A case of the ingredient originating from three or more foreign countries>>

| | |
|-----------------|--|
| Name | Dark Soy Sauce (Naturally Brewed) |
| Ingredients | Soybeans (Import), Wheat, Salt |
| Net | 400ml |
| Expiration date | March 30, 2018 |
| How to store | Store at room temperature away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

<<Example 2: A case of imported portion being greater than domestic portion>>

| | |
|-----------------|--|
| Name | Dark Soy Sauce (Naturally Brewed) |
| Ingredients | Soybeans (Import, Domestic), Wheat, Salt |
| Net | 400ml |
| Expiration date | March 30, 2018 |
| How to store | Store at room temperature away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

<<Example 3: A case of domestic portion being greater than imported portion>>

| | |
|-----------------|--|
| Name | Dark Soy Sauce (Naturally Brewed) |
| Ingredients | Soybeans (Domestic, Import), Wheat, Salt |
| Net | 400ml |
| Expiration date | March 30, 2018 |
| How to store | Store at room temperature away from direct sunlight. |

| | |
|----------|---|
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |
|----------|---|

Q33 In All Inclusive Labelling, is labelling in smaller category than “imported,” such as “Produced in EU” “Produced in South America” accepted?

Answer

1 “Produced in EU” or “Produced in South America,” etc. may be acceptable as this is a smaller category than “Import.”

However, as for the conditions for permitting “Import” labelling, only if the order by weight and supplying countries of a product are expected to be changed for the labelling of an ingredient originating from three or more foreign countries in EU or South America, etc. within a year, including the time when new labelling is expected (date of production), and it is going to be difficult to list the supplying countries in descending order by weight based on the past records or the future plans on ingredients use by production center for a defined period of time, as All Inclusive Labelling, Produced in EU, Produced in NAFTA, Produced in ASEAN, Produced in Africa, or Produced in South America, etc. may be labelled.

2 In the case of using multiple production centers in a smaller category than “Imported,” it is also possible to label the production center in a smaller category than “imported” together, such as “Imported (Produced in EU, Produced in South America),” “Imported (Produced in EU or South America).”

In the case of labelling as “Imported (Produced in EU or South America),” a warning to the effect that the labelling is based on past records or future plans for ingredients used by the production center for a defined period of time, and storage of source documents in which are described past records or future plans for ingredients use by the production center for a defined period of time for ingredients for each category is required.

V All Inclusive Labelling + And/Or Labelling

Q 34 Which case is permitted to use both All Inclusive Labelling and And/Or Labelling in combination (“import or domestic” or “domestic or import”) (labelling prescribed in 1-(v)(c) of the processed food other than imported food column in the chart in Article 3, Paragraph 2 of the Food Labelling Standards)?

Answer

That combination is allowed in addition to meeting the conditions permitting the All Inclusive Labelling (see Q 31), and when there is a change for the order by weight for the imported ingredients (total) and domestic ingredients, which make it difficult to display such labels with “import, domestic,” or “domestic, import,” and the conditions for And/Or Labelling are met too (see Q 26).

(Example: A case, where the combined application of All Inclusive Labelling and And/Or Labelling is permitted)

| | | | | | |
|-------------|-----------|-----------|-----------|-----------|--|
| Apr to June | Country A | Country B | Country C | Domestic | Total of Import > Domestic Country A is predominant |
| July to Sep | Country C | Country A | Country B | | Only Import Country C is predominant |
| Oct to Dec | Domestic | Country B | Country A | Country C | Total of Import < Domestic Domestic is predominant |
| Jan to Mar | Country B | Country A | Country C | Domestic | Total of Import > Domestic Country B is predominant |

Q 35 What is a basic labelling method used for a case using both All Inclusive Labelling and And/Or Labelling in combination (“import or domestic” or “domestic or import”)?

Answer

1 The combination of the All Inclusive Labelling and And/Or Labelling is a method listing “import” and “domestic” in descending order by weight based on the past records or the future plans on ingredients use by supplying country for a defined period of time, which are connected with “or.”

For example, when labelling “Import or Domestic,”

- (1) They mean the following four approaches as places of origin: “Import only,” “Domestic, only,” “the order of Import, Domestic,” and “the order of Domestic, Import.”
- (2) This indicates that in the past records or in the future plans on ingredients use by supplying country for a defined period of time, the usage percentage of ingredients supplied by imported products (total) is greater than the usage percentage of ingredients supplied by domestic products.

2 In order to prevent information being misleading consumers, it is always required to include a warning on the container or package that such labelling is based on the past records or the future plans on ingredients use by supplying country for a defined period of time (See Q 36).

<<Example 1>>

| | |
|-----------------|--|
| Name | Pork sausage (wiener) |
| Ingredients | Pork (Import or Domestic), Lard, Hydrolyzed Protein (contains Soybeans, Pork, Gelatin), Reducing Sugar Syrup, Salt, Spice (contains Soybeans) / Seasoning (Amino Acid, etc.), Phosphoric Salt (Na, K), ... |
| Net | 150 g |
| Expiration date | December 31, 2017 |

| | |
|--------------|---|
| How to store | Store at 10°C or below |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

*Countries of origin for pork and the order are based on the past records on ingredients use over the period from September 2015 to August 2016

<<Example 2>>

| | |
|-----------------|---|
| Name | Flour |
| Ingredients | Wheat (Import or Domestic) |
| Net | 1 kg |
| Expiration date | March 31, 2018 |
| How to store | Store at room temperature in a cool dry place |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

*Countries of origin and the order for wheat are based on the past records on ingredients use that date back 2 years from the expiration date

VI Past records on ingredients use, etc.

Q 36 In the And/Or Labelling and All Inclusive Labelling + And/Or Labelling, what expression is acceptable for a warning to indicate that the labelling is based on the past records or the future plans on ingredients use by supplying country for a defined period of time?
How long does the defined period of time have to be?

Answer

- 1 When And/Or Labelling and All Inclusive Labelling + And/Or Labelling, are used, a warning is needed for consumers understanding that the labelling is showing the order based on the past records or the future plans on ingredients use by supplying country over a defined period of time.
- 2 Regarding the warning note based on the past records on ingredients use by supplying country for a defined period of time, some examples would be like below:
 - (1) Countries of origin for XX and the order are based on the past records on ingredients use in 2015
 - (2) Countries of origin for XX and the order are based on the past records on ingredients use over a two-year period since 2014
 - (3) Countries of origin for XX and the order are based on the past records on ingredients use of previous year of the production year
 - (4) Countries of origin for XX and the order are based on the past records on ingredients use of two years

before the production year

- (5) Countries of origin for XX and the order are based on the past records on ingredients use of last year
- (6) Countries of origin for XX and the order are based on the past records on ingredients use of the year before last
- (7) Countries of origin for XX and the order are based on the past records on ingredients use of past one year
- (8) Countries of origin for XX and the order are based on the past records on ingredients use during the past two years
- (9) Countries of origin for XX and the order are based on the past records on ingredients use that date back X years from the expiration date
- (10) Countries of origin for XX and the order are based on the past records on ingredients use that date back X to X years from the expiration date
- (11) Countries of origin for XX and the order are based on the past records on ingredients use for X years since dating back X years from the expiration date
- (12) Countries of origin for XX and the order are based on the past records of the period from September 2015 to August 2016
- (13) Countries of origin for XX and the order are based on the past records on ingredients use that date back X years from the production
- (14) Countries of origin for XX and the order are based on average of the past records on ingredients use last X years.

As noted in Q 26, the period that can be tracked back is within three years prior to the year (year of production, fiscal year of production, etc.) in which a product is labelled (date of production). For example, if the production year is 2017, the past record(s) on ingredients use of more than a year selected by the business operator among those in 2014, 2015, and 2016 can be specified in the note.

It is required to indicate to consumers which period of the records are used for a product whose expiration period is long or omitted to label.

3 The followings are examples of notes for labelling in the order of the usage plans by supplying country over a defined period of time in the future:

- (1) Countries of origin for XX and the order are labelled based on the usage plans of 2017
- (2) Countries of origin for XX and the order are labelled based on the usage plans of this fiscal year
- (3) Countries of origin for XX and the order are labelled based on the assumption from the contracted farming from June 2017 to May 2018
- (4) Countries of origin for XX and the order are labelled based on the usage plans of production year
- (5) Countries of origin for XX and the order are labelled based on the usage plans of 2017. Continuous labelling, if there is no change for the usage plans for 2018

In any of the above cases, it is permitted to use them as a note if a product is produced within the said usage plans.

4 For Japanese calendar years,

(1) Label “Heisei XX,” if no specifications are given, whose period is assumed to be from January to December

(2) Label “Heisei XXth Fiscal Year,” if no specifications are given, whose period is assumed to be from April to March. (The same will apply for cases using the Western year instead of Japanese year)

In cases where operations that differ from the above mentioned such as fiscal years set for each agricultural crop are applied, the scope of the said year should be noted.

Labelling of “the order based on the past records on ingredients use of last year” indicates 2016 if the production year is 2017, and 2017 if the production year is 2018. If the said labelling is continued, please check whether or not it becomes false labelling.

5 The notes described above are just labelling examples and it does not mean other descriptions are unacceptable. Please make a note easy to understand for consumers.

Q 37 What types of documents should be retained for the And/Or Labelling, All Inclusive Labelling or All Inclusive Labelling + And/Or Labelling,?

Answer

1 In the case of the And/Or Labelling, All Inclusive Labelling or All Inclusive Labelling + And/Or Labelling, documents should be retained as evidence confirming that such labelling is permitted for the ingredients.

(1) Documents indicating the following periods are from when to when (defined by a business operator).

(i) One year period (such as year of production and fiscal year of production) in which a product is labelled (date of production)

(ii) A defined period of time in the past or in the future

(2) Documents indicating that the changes of the order of supplying countries by weight and the changes of supplying countries of ingredients over a defined period of time in the past or in the future based on the methods of Q 26 and Q 31.

(3) Documents indicating the calculation units (per one product, common unit for controlling ingredients, etc.) used in the past records on ingredients use by supplying country over a defined period of time in the past.

(4) Regarding the note in And/Or Labelling or All Inclusive Labelling + And/Or Labelling, documents indicating the order of supplying countries of ingredients (total imported ingredients and domestic ingredients for All Inclusive Labelling + And/Or Labelling,) by weight during the specified period of time described in the note.

2 For 1, the following examples could be considered as documents for the past records on ingredients use by supplying country over a defined period of time:

(1) Invoices and delivery statements, etc. listing the country of origin

(2) Specifications, etc. listing the country of origin and the container or package, invoices or delivery

statements, etc. indicate that the product is based on which specifications, etc.

- (3) Documents that show purchased ingredients have been used for the said product (production records, production manuals, etc.)

If the order of usage percentages by country of origin in the ingredients is not easily determined from documents (1) to (3), any documents summarizing the details of (1) to (3) and clarifying the order of usage percentages by country of origin in the said product are required to be retained.

3 For 1, the following examples could be considered for documents for the usage plans for ingredients by supplying country over a defined period of time in the future:

- (1) A usage plan clearly specifying a supplying country for a product used in the ingredient
- (2) A procurement plan stating a supplying country from a supplier (a trading company, etc.) of the ingredient and a document clearly specifying the ingredient will be used based on the said procurement plan
- (3) A contract on contracted farming, etc. with a producer and a document clearly specifying the ingredient will be used based on the said contract

4 In any of the cases, any details that are clearly defining the one-year period (production year, production fiscal year, etc.) in which a product is labelled (date of production) and a certain period of time in the past or in the future and that are considered reasonable as evidence for labelling should be retained depending on actual situations for production and distribution. At the time of supervising (site inspection), the actual circumstances of usage for ingredients will be cross checked with the details of the label. Please retain any documents that show the records on ingredients use at the time of producing the products.

Q 38 In the case that labelling is conducted based on the past records or the future plans on ingredients use by supplying country for a certain period of time, what level of legitimacy is required for the past record or the usage plan?

Answer

1 When labelling based on the future plans on ingredients use by supplying country, and if (1) the actual usage results are significantly different and no legitimate explanation is given; and (2) no legitimate explanation is given for the basis of setting the plan, the said usage plan is not considered as a source for labelling.

- (1) A case of the actual usage results being significantly different from the labelling especially when labelling the third country and beyond among three or more supplying countries as "others," and the majority of ingredients ended up being supplied by countries being categorized as "others."

(Examples of the actual usage results being significantly different)

- i) If originally labelling "Country A or Country B or Others," it has resulted, during the planning period, that ingredients from neither Country A nor Country B were merely used and only ingredients from countries

included in “Others” were used.

- ii) If originally labelling “Country A or Country B or Others,” it has resulted, during the planning period, that ingredients from either Country A or Country B were not used at all.

- (2) Cases of no legitimate explanation being given can be as follows.

However, in the event of unexpected circumstances such as natural disaster, outbreak of a disease epidemic in domestic animals, or suspension of shipping freight due to a port strike, etc., which is likely to cause significant strains on the stable supply of food, it is deemed that legitimate explanations are possible.

- i) A case, which is significantly different from the original usage plan without any clear reason, such as procurement, which is different from the plan due to the preferences of the company or the business, with which it trades.
- ii) A case, where suppliers and contractors listed in the original plan were fabricated, as a result, ingredients from the labelled countries of origin have not been received.
- iii) Any other cases, where evidence of the plan is ambiguous. (A case where the period for the usage plan is not specified, or a case where the names of the supply countries are listed vaguely.)

- 2 When labelling based on the past records on ingredients use for a defined period of time are significantly different from actual usage such as a case, where the predominant supplying country became, in fact, in the “Others,” with no legitimate explanation given for such labelling, which is the same circumstance as 1, such records on ingredients use are not regarded as evidence for the labelling.

Q 39 How long should the source documents be retained for the And/Or Labelling and All Inclusive Labelling, etc.?

Answer

- 1 As shown in Q 26, Q 31, and Q 37, besides the effort obligation provision, Article 41, of the Food Labelling Standards, as one of the conditions for the And/Or Labelling and All Inclusive Labelling, it is required to retain documents indicating that the changes of the order of supplying countries by weight and changes of supplying countries over a defined period of time in the past or in the future and documents indicating the order of usage percentage by supplying country for the said period of time.

- 2 The retention period for source documents, etc. is

- (1) One year from the expiration (best-before) date on the product, whose label is written based on such evidence
- (2) Five years from the production date, if the expiration date is not displayed or omitted.

- 3 If continuing with the And/Or Labelling and All Inclusive Labelling the currently used percentages, etc. by supplying country will be used as the previously used records. Please retain these documents considering this

factor.

Q 40 When using And/Or Labelling or All Inclusive Labelling, etc., what kind of unit can be used for past records or future plans on ingredient use by supplying country for a defined period of time?

Answer

- 1 As methods of recording past records or future plans for ingredients use by the production center for a defined period of time when using And/Or Labelling or All Inclusive Labelling, etc., in addition to the method of product in factory, the following concepts may also be used.
 - (1) In the case of producing in multiple factories in efforts to standardize packaging materials for everything, recording in units of products that use the common packaging material may be used.
 - (2) When looking product units, management of ingredients for multiple products is standardized, such as in the case where process of ingredient purchasing or processing the same, or ingredient tank is the same, etc., recording in product units for which management of ingredients are standardized.
- 2 Past records or future plans for ingredient use by production centers for a defined period of time for the entire company or entire factory tallied without separation of products for which management of ingredients is not standardized may not be used.

VII Production Country Labelling for Semi-Processed Ingredients

Q 41 What is a labelling method used for the case that the ingredient subject to the country of origin labelling is semi-processed ingredient?

Answer

- 1 When the ingredient subject to the country of origin labelling is semi-processed ingredient, the production place of the product is to be labelled corresponding to the name of the ingredient labelled.
- 2 Production methods for processed foods can vary. They can be produced from perishable ingredients or produced using semi-processed ingredients manufactured at a factory of a different company, and thus it may be difficult to identify the country of origin of semi-processed ingredients tracing back the countries of origin of their perishable ingredients in some cases.

Since it has always been the case that labelling ingredients are shown by the most general names regardless of whether they are perishable ingredients or semi-processed ingredients, the production place corresponding to the name of semi-processed ingredients is to be labelled as the country of origin of the ingredient

On the other hand, in the case of the ingredient being a semi-processed ingredient, if a country of origin is labelled, this may mislead consumers as though the said country of origin is for perishable ingredients used in the

semi-processed ingredient. Thus, the country of origin for the semi-processed ingredient should be labelled as “produced in XX” (“Processed in XX” labelling is not permitted).

3 If there are several countries to label as production countries, supplying countries in descending order by weight is to be labelled as a general rule and the words “produced in” must always be added for each country. (The labelling of “Produced in Germany, Brazil” is not permitted.) “Produced in XX” in brackets needs to be shown after the name of a semi-processed ingredient, which corresponds individually with the name of the semi-processed ingredient. That means, labelling “Produced in XX” corresponds to the perishable ingredients is not acceptable, such as “Apples (Produced in Germany)” for example.

4 If countries of origin for ingredients used for a semi-processed ingredient can be traced back to perishable ingredients and that can be objectively confirmed, instead of labelling “Produced in XX,” the said country of origin can be labelled together with the said perishable ingredient.

5 The other labelling methods are the same as perishable ingredients. That means that “Produced in XX Prefecture” can be used for labelling instead of “Domestically Produce” as shown in Q19.

<<Example 1: Production country labelling for semi-processed ingredients>>

(Purchase apple juice and use it as ingredient)

| | |
|-----------------|--|
| Name | Non-alcoholic beverage |
| Ingredients | Apple Juice (Produced in Germany), Fructose-glucose Syrup, Fructose/Acidifier, Vitamin C |
| Net | 500ml |
| Expiration date | December 31, 2017 |
| How to store | Store in a cool dry place away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

(Purchase baked cake and use it as ingredient)

| | |
|--------------|---|
| Name | Dorayaki |
| Ingredients | Pancake (Domestically Produced) (Eggs, Flour, Sugar), Bean Jam (Sugar, Azuki Beans, Malt Syrup, Agar) / Raising Agent |
| Net | 1 Piece |
| Use by | December 31, 2017 |
| How to store | Store in a cool dry place away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

(Purchase wheat flour and use it as ingredient)

| | |
|--------------|--|
| Name | Sliced Bread |
| Ingredients | Flour (Domestically Produced), Sugar, Margarine, Yeast, Salt (partially contains Wheat and Dairy Product) |
| Net | 6 Slices |
| Use by | Written on the front of package |
| How to store | Store in a cool dry place away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo |

<<Example 2: Production country labelling for semi-processed ingredients (Labelling by adding a category of Country of Origin for Ingredients)>>

(Purchase apple juice and use it as ingredient)

| | |
|-----------------------------------|--|
| Name | Non-alcoholic beverage |
| Ingredients | Apple Juice, Fructose-glucose Syrup, Fructose/Acidifier, Vitamin C |
| Country of Origin for Ingredients | Produced in Germany (Apple Juice) |
| Net | 500ml |
| Expiration date | December 31, 2017 |
| How to store | Store in a cool dry place away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

<<Example 3: Labelling by tracing back the country of origin to perishable ingredients for semi-processed ingredients>>

| | |
|-----------------|--|
| Name | Non-alcoholic beverage |
| Ingredients | Apple Juice (Apples (Germany, Hungary)), Fructose-glucose Syrup, Fructose/Acidifier, Vitamin C |
| Net | 500ml |
| Expiration date | December 31, 2017 |
| How to store | Store in a cool dry place away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |



inappropriate



| | |
|-----------------|--|
| Name | Non-alcoholic beverage |
| Ingredients | Apple Juice (Apples (produced in Germany, produced in Hungary)), Fructose-glucose Syrup, Fructose/Acidifier, Vitamin C |
| Net | 500ml |
| Expiration date | December 31, 2017 |
| How to store | Store in a cool dry place away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

<<Example 4: Labelling by tracing back the country of origin of perishable ingredients for semi-processed ingredients (Labelling by adding a category of Country of Origin for Ingredients)>>

| | |
|-----------------------------------|--|
| Name | Non-alcoholic beverage |
| Ingredients | Apple Juice, Fructose-glucose Syrup, Fructose/Acidifier, Vitamin C |
| Country of Origin for Ingredients | Germany (Apples), Hungary (Apples) |
| Net | 500ml |
| Expiration date | December 31, 2017 |
| How to store | Store in a cool dry place away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

| | |
|-----------------------------------|--|
| Name | Non-alcoholic beverage |
| Ingredients | Apple Juice, Fructose-glucose Syrup, Fructose/Acidifier, Vitamin C |
| Country of Origin for Ingredients | Germany, Hungary (Apples) |
| Net | 500ml |
| Expiration date | December 31, 2017 |
| How to store | Store in a cool dry place away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

<<Example 5: When labelling the country of origin of perishable ingredients for semi-processed ingredients by adding a category of Country of Origin for Ingredients, and the same perishable ingredient is used in a few semi-processed ingredients>>

* It must be clearly described which semi-processed ingredient contains the perishable ingredient labelled with the origin of the country.

| | |
|-----------------------------------|--|
| Name | Non-alcoholic beverage |
| Ingredients | Apple Juice, Apple Grains, Fructose-glucose Syrup, Fructose/Acidifier, Vitamin C |
| Country of Origin for Ingredients | Hungary (Apples (Apple Juice)) |
| Net | 500ml |
| Expiration date | December 31, 2017 |
| How to store | Store in a cool dry place away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

Q 42 How is the production country for semi-processed ingredients determined?

Answer

- 1 When semi-processed ingredients are domestic, and when manufactured in Japan, “domestically produced” shall be labelled, and in the case of imported goods, “produced in xx” shall be labelled to indicate production in a foreign country.
- 2 For imported semi-processed ingredients, normally the production center on the Import Permission at customs clearance is regarded as the production center.
- 3 In addition, in the case of purchasing imported processed foods for which some kind of actions are added by other companies inside Japan and using those as semi-processed ingredients, see 43 in this Q&A.
- 4 Supposing “manufacturing” or “processing” is conducted, the fact that the name of an items such as manufacturer or processor is changed, and the fact that Semi-Processed Ingredients become “domestically produced” after substantial changes inside Japan are separate issues, so please make judge appropriately in the respective cases.

Q 43 What are the examples of acts conducted domestically for imported semi-processed ingredients which cannot be considered “domestic production?”

Answer

- 1 When semi-processed ingredients are domestically produced, it is necessary to label “domestically-produced” to indicate they are manufactured in Japan, and when they are imported, it is necessary to label “produced in xx” to indicate that they are manufactured in foreign countries.
- 2 Therefore, for imported semi-processed ingredients, if “action to cause substantial changes in specifics of

products” are made by other domestic companies, and then they are purchased and used as semi-processed ingredients, they are labelled “domestically produced.”

3 “Action to cause substantial change in specifics of products” is under the same concept as in “country of origin” labelling, to show the fact that they are imported items as product. (See Food Labelling Standards Q&A Processing-154, 155)

| Primary examples of not being “action to cause substantial changes in specifics of products” and so not being “domestically produced” | |
|---|--|
| Attaching stickers, modifications, or replacement of stickers on containers or packages | Attaching Japanese stickers for use in Japan on containers or packages |
| Creating assortments | Creating assortments among external decorations for sales |
| Subdivision | Subdivision after purchase in bulk Example: Purchasing broiled eel and subdivision, purchasing pasta in bulk and subdivision |
| Cutting | Simple cutting such as slicing Example: Slicing ham |
| Shaping | Forming in shape Example: Shaping in shape of block bacon |
| Screening | Screening by shape or size Example: Screen dried anchovy by size |
| Crushing | Slight crushing (except for powdered items) Example: cracked soybeans |
| Mixing | Mixing the same type of food Example: Mixed tea leaf |
| Combination | Creating assortment of different types of food for easier separation, etc. Example: Assortment for easier separation by individual packaging or partition, etc. |
| Deboning | Only removing bones Example: removing bones from salted mackerel |
| Freezing | Freezing for transportation or storage |
| Defrosting | By natural defrosting, etc., defrost simply-frozen food to the state of cooling or room temperature Example: Defrost frozen boiled octopus |
| Drying | Drying for transportation or storage |
| Salt water soaking | Soaking in salt water for transportation or preservation |
| Salt addition | Adding salt to already salted food, etc. Example: Add salt to lightly-salted salmon to make heavily-salted salmon |

4 Primary examples of not being “action to cause substantial changes in specifics of products” and so not being “domestically produced” are as follows:

| | |
|-----------------------------------|---|
| Minor addition of seasoning, etc. | Adding small amount of seasoning, etc. Example: Adding very small amount of soy sauce to plain boiled food Addition of small amount of relish Example: Sprinkle sesame seeds on candied sweet potatoes |
| Addition of additives | Add additives Example: Adding Vitamin E to grapeseed oil for the purpose of nutritional enhancement, coloring dried small shrimp, adding flavor to orange juice |
| Disinfection | Disinfecting before and after packaging Example: heat disinfection of dried small fish, disinfection upon subdivision of concentrated fruit juice |
| Binding prevention | Coating with vegetable oil to prevent binding Example: Coating raisins with vegetable oil |
| Reheating | Simple heating such as re-frying, re-broiling, re-steaming, etc. |

Q 44 For semi-processed ingredients produced via several production process stages, for which stage should the production country be labelled?

Answer

In the case where ingredients subject to country of origin labelling are semi-processed ingredients, the production center or the country of origin by tracking back to fresh ingredients must be labelled, and the production place labelling at an optional stage other than this cannot be accepted as country of origin labelling.

<<Appropriate Example>>



| | |
|--|--|
| Name | Bread roll filled with bean jam |
| Name of country of origin of ingredients | Bean Jam (produced in country A), Flour, Sugar, Margarine, Eggs, Skim Milk ... |
| Net | 1 piece |
| Expiration date | December 31, 2017 |
| How to store | Store away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

<< Inappropriate example of not tracing back to fresh ingredients>>



| | |
|-----------------|--|
| Name | Bread roll filled with bean jam |
| Ingredients | Bean Jam (Sugar (domestically produced), Azuki Beans, Malt Syrup, Other), Flour, Sugar, Margarine, Egg, Skim Milk, ... |
| Net | 1 piece |
| Expiration date | December 31, 2017 |
| How to store | Store away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

Q 45 In the case where semi-processed ingredients subject to country of origin labelling are composite ingredients and not “Production Country Labelling for Semi-Processed Ingredients,” but where labelling should be done by tracing back to country of origin of perishable ingredients, which of the composite ingredients should be labelled with the country of origin?

Answer

- 1 In the case where country of origin for composite ingredients is labelled by tracking back to country of origin of perishable ingredients, labelling of country of origin of the heaviest ingredients by weight in the composite ingredients (the most predominant ingredient by weight) is required.
- 2 Even though the most predominant ingredient by weight in the composite ingredients is lighter than the second predominant ingredient by weight in the entire product, still the most predominant ingredient by weight in the composite ingredients is subject to the country of origin labelling obligation.
- 3 In such instance, for country of origin labelling of composite ingredients, not only the name of the ingredient for which to label the country of origin, in accordance with the labelling method of the ingredients in the composite ingredients, by adding brackets after the name of the composite ingredients, all of the names of ingredients for the relevant composite ingredients must be labelled in descending order from the heaviest ingredient by weight

In addition, if there are three or more types of ingredients for the relevant composite ingredient, ingredients of which percentage of weight to the ingredients of the relevant composite ingredients ranks third or lower, and the ratio thereof is less than 5%, may be labelled as Other. (See Food Labelling Standards Q&A Processing—52)

- 4 In addition, not only the most predominant ingredients by weight in composite ingredients, it is desirable to label the country of origin for the second and third most predominant ingredients by weight in composite ingredients.

<< Example 1: Labelling by tracing back the ingredients for the Semi-Processed Ingredients >>

| | |
|-----------------|--|
| Name | Dorayaki |
| Ingredients | Pancake (Egg (Domestic), Flour, Sugar), Bean Jam (Sugar, Azuki Beans, Malt Syrup) /Raising Agent |
| Net | 1 piece |
| Expiration date | December 31, 2017 |
| How to store | Store away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

<< Example 2: Labelling by tracing back the ingredients for the Semi-Processed Ingredients>>

| | |
|--|--|
| Name | Dorayaki |
| Ingredients | Pancake (Egg, Flour, Sugar), Bean Jam (Sugar, Azuki Beans, Malt Syrup)/Raising Agent |
| Name of country of origin of ingredients | Domestic (Eggs) |
| Net | 1 piece |
| Expiration date | December 31, 2017 |
| How to store | Store away from direct sunlight in a cool dry place |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

Q 46 On which step of processing should be labelled for the county of origin about the semi-processed ingredient internally produced domestically?

Answer

- 1 It is supposed that the country of origin is to be labelled in accordance with the name of ingredient. Therefore, label the country of origin of the ingredient which is appropriately labelled under the Food Labelling Standard.
- 2 For example, as often happened in vegetable fat and oil, purification is processed after mixing crude oil produced from oil seed internally and another crude oil from external company, production place of the fat and oil (semi-processed ingredient) is to be labelled in principle as far as the ingredient is shown by the name of fat and oil.

Q 47 Are the And/Or Labelling and All Inclusive Labelling, etc. permitted for the production country labelling for semi-processed ingredients?

Answer

- 1 For the purpose of providing information to consumers, the labelling of supplying countries in descending order by weight is required as a general rule for the production country labelling for semi-processed ingredients.
However, if the labelling of supplying countries in descending order by weight, even in the case of labelling production countries, proves to be difficult, the And/Or Labelling, All Inclusive Labelling, and the combination of these two types of labelling would be permitted under certain conditions.
The conditions permitted for such labelling are exactly the same as those for the perishable ingredients labelling. (See Q 26 to Q 37)
- 2 For the All Inclusive Labelling the labelling of “foreign produced” is permitted but “imported and produced” or “produced outside Japan” is not permitted as they do not clearly describe their meaning.

<<Example 1: And/Or Labelling for the labelling of production country>>

| | |
|-----------------|--|
| Name | Non-alcoholic beverage |
| Ingredients | Apple Juice (produced in Germany or produced domestically), Fructose-glucose Syrup, Fructose/Acidifier, Vitamin C |
| Net | 500ml |
| Expiration date | December 31, 2017 |
| How to store | Store in a cool dry place away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

*Production places for apple juice and the order are based on the past records on ingredients use in 2015

<<Example 2: All Inclusive Labelling for the labelling of production country>>

| | |
|-----------------|--|
| Name | Non-alcoholic beverage |
| Ingredients | Apple Juice (foreign produced), Fructose-glucose Syrup, Fructose/Acidifier, Vitamin C |
| Net | 500ml |
| Expiration date | December 31, 2017 |
| How to store | Store in a cool dry place away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

Q 48 There are rules provided for labelling methods of ingredients for each item in Appendix 4 in the Food Labelling Standards. Following these rules and in the case of labelling the names of ingredients classified as perishable food by tracing them back instead of labelling the names of semi-processed ingredients, how shall we label countries of origin for ingredients?

Answer

- 1 Ingredients subject to the mandatory labelling of country of origin for ingredients are the ingredients individually specified in Appendix 4 in the Food Labelling Standards and are the most predominant ingredient by weight.
- 2 The labelling methods should be in accordance with Appendix 20 or Appended Form 1 in the Food Labelling Standards and any of the following will be labelled, as a general rule, by adding an itemized column for the country of origin for ingredient.
 - (1) To label the country of origin corresponding to the name of ingredient, which is labelled based on the individual provisions.

<<Example 1: A case of using concentrated apple juice and showing the countries of origin of it>>

| | |
|----------------------------------|--|
| Name | Apple Juice (from concentrate) |
| Ingredients | Apples /Flavoring |
| Country of Origin for Ingredient | Germany, Japan |
| Net | 500ml |
| Expiration date | December 31, 2017 |
| How to store | Store in a cool dry place away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

(2) Label the name of ingredient and its country of origin corresponding to the state when it was used as the ingredient (when a product was produced).

In this case, in accordance with the individual provisions, please label all ingredients and their countries of origin specified in the ingredients labelled in the names of ingredients column.

<<Example 2: A case of using concentrated apple juice produced in Germany and squeezed apple juice produced domestically, and showing the countries of origin for concentrated apple juice and apple >>

| | |
|----------------------------------|--|
| Name | Apple Juice (from concentrate) |
| Ingredients | Apples /Flavoring |
| Country of Origin for Ingredient | Produced in Germany (Apple Juice), Domestic (Apples) |
| Net | 500ml |
| Expiration date | December 31, 2017 |
| How to store | Store in a cool dry place away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

<<Example 3: A case of And/Or Labelling using concentrated apple juice produced in Germany and squeezed apple juice produced domestically, and showing the countries of origin for concentrated apple juice and apples >>

| | |
|----------------------------------|--|
| Name | Apple Juice (from concentrate) |
| Ingredients | Apples /Flavoring |
| Country of Origin for Ingredient | Produced in Germany (Apple Juice) or Domestic (Apples) |
| Net | 500ml |
| Expiration date | December 31, 2017 |
| How to store | Store in a cool dry place away from direct sunlight. |

| | |
|----------|---|
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |
|----------|---|

*Production places for apple juice and apples and the order are based on the record of 2015.

3 Without adding a category of Country of Origin for Ingredients, the country of origin can be labelled in the ingredients column by placing brackets after the name of the corresponding ingredient.

In this case, if the ingredient is labelled with the name of perishable food, it is not permitted to label semi-processed ingredient together with it (for example, “Ingredients: Apples (Apple juice (Produced in XX))”).

<<Example 4: A case of using concentrated apple juice produced in Germany and concentrated apple juice produced domestically, and showing the countries of origin for apples >>

| | |
|-----------------|--|
| Name | Apple Juice (from concentrate) |
| Ingredients | Apples (Germany, Japan) /Flavoring |
| Net | 500ml |
| Expiration date | December 31, 2017 |
| How to store | Store in a cool dry place away from direct sunlight. |
| Producer | XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo |

VIII For Professional Use

Q 49 What are the labelling requirements for processed food products for professional use in relation to the country of origin labelling for ingredients?

Answer

1 For any products sold to consumers, in order to properly label countries of origin for ingredients, it is needed to appropriately inform on countries of origin for processed food products for professional use such as semi-processed ingredients.

On the other hand, any matters, which are not related to the labelling of countries of origin for ingredients of the final products, have no mandatory labelling (or the information transmission) requirements.

2 In order to ensure the accuracy of the country of origin labelling for ingredients of the final products, the following must be labelled (or the information transmitted):

- (1) Countries of origin for the processed food product for professional use, if the said processed food product for professional use in the final product is subject to the mandatory production country labelling (as the most predominant ingredient by weight in the final product, etc.)
- (2) Countries of origin for the ingredient subject to the mandatory labelling for the country of origin for the ingredient in the final product (such as the most predominant ingredient by weight in the processed food product for professional use, etc.), if the said processed food product for professional use other than imported

products will be a final product only by simple cutting or subdivision, etc., which are not considered as "practical modification"

- 3 Businesses selling any processed food products for professional use must thoroughly check whether their food products fall under any of categories (1) or (2) above or neither of them. Businesses buying any processed food products for professional use must be aware that if, for example, any products lacking the country of origin labelling for ingredients since they were bought for the purpose of (1) above have been sold for general consumers at a supermarket, this will be a violation of the Food Labelling Standards.
- 4 If there is an agreement between food businesses and the products have the country of origin labelling for ingredients by tracing back to perishable foods, the labelling of (1) or (2) above (or the information transmission) is not required since this does not affect the labelling of countries of origin for ingredients for a final product.
- 5 Separately from the above, for any processed food products for professional use, which are imported but in which there have been no "acts of practically modifying their contents" domestically after being imported, the country of origin labelling is required for the said processed food products for professional use. (See "Processing - 154, 155 of Q&A of the Food Labelling Standards")

Q 50 How do we label the country of origin for processed food products for professional use?

Answer

- 1 Please label (or transmit information) the country of origin for processed food products for professional use.
- 2 For imported products "country of origin: Country A" is labelled. For processed food products for professional use in which there have been "acts of practically modifying their contents" domestically "domestically produced" or "made in Japan" in addition to "country of origin: domestic " are to be labelled (information transmitted) so that it does not mislead producers, etc. of processed foods for general use.
- 3 It is considered that indicating "domestically produced" is labelled (the information transmitted) if the production place and the producer are labelled with the same manner of general processed food and required items are filled for the "production place," as long as the businesses do not misunderstanding the labelling.

Q 51 How do we label the country of origin for ingredients for processed food products for professional use?

Answer

- 1 This is the same labelling method as applied for supplying countries for ingredients of processed food for general use. Indicating that it is "domestically produced" for domestically produced products and a "Country of

Origin” for imported products, both corresponding to the name of the ingredient, should be labelled (information transmitted). In the case of domestically produced products, in addition to the labelling that they are domestically produced, the following names of places can be labelled.

- (1) For agricultural products: any names of prefectures or other names of places generally known
- (2) For livestock products: any names of prefectures or other names of places generally known, where main feeding facility is located
- (3) For fishery products, any names of waters, landing ports, or names of prefectures or other names of places generally known, where the landing port or the main cultivation site is located

2 For imported fishery products, the names of the waters can also be labelled with the name of the country of origin.

3 In the case of two or more countries of origin, the descending order by weight in the ingredient should be clearly labelled. If the percentages are labelled so that the order by greater weight is evident, labelling the descending order by weight is not necessarily required.

4 If the said ingredient is a semi-processed ingredient, the labelling of a production country (label as “Produced in XX”) is required.

Q 52 Where shall we label the country of origin and the country of origin for ingredients for processed food products for professional use?

Answer

1 Countries of origin and countries of origin for ingredients, when trading processed food products for professional use, can be labelled not only on the container or package but also in invoices, delivery statements, etc., or specifications, etc.

2 In the case of labelling them in specifications, etc., it is necessary to be able to refer to that the shipped and delivered products are based on which specifications, etc. on the container or package, or in invoices, or delivery statements, etc.

3 As noted in the above, it is permitted to specify the mandatory labelling items for processed food products for professional use not only on the container or package but also in invoices, delivery statements, etc. or specifications, etc. However, any matters provided in Article 13, Item (ii) of the Food Labelling Standards are required to label on the container or package, thus, these provisions must be followed for labelling.

Q 53 What are the labelling requirements for perishable food for professional use in relation to the country of origin labelling for ingredients?

Answer

1 In order to ensure the accuracy of the country of origin labelling for ingredients in the final products, it is required to label countries of origin for the perishable foods for professional use, if the said perishable food is used as an ingredient (the most predominant ingredient by weight), which is subject to the mandatory labelling of a country of origin for an ingredient.

For the perishable food for professional use, whose country of origin labelling for ingredients is certainly not required in the final product, the above labelling can be omitted.

2 If it is uncertain whether or not the country of origin labelling for ingredients is required in a final product, the above labelling cannot be omitted.

Q 54 How shall we label the country of origin for perishable food for professional use?

Answer

1 The country of origin labelling for a perishable food for professional use will be the labelling source for the country of origin for the ingredient used for a processed food. Its labelling method is the same as that of the country of origin for the ingredient used for a processed food. “Domestically produced” indication is labelled for any domestically produced products and a “Country of Origin” is labelled for any imported products. In the case of domestically produced products, in addition to the labelling indicating that they are domestically produced, the following names of places can be labelled.

- (1) For agricultural products: any names of prefectures or other names of places generally known
- (2) For livestock products: any names of prefectures or other names of places generally known, where main feeding facility is located
- (3) For fishery products, any names of waters, landing ports, or names of prefectures or other names of places generally known, where the landing port or the main cultivation site is located

2 For imported fishery products, the names of the waters can also be labelled with the country of origin.

3 In the case of two or more countries of origin, the descending order by weight in the ingredient should be clearly labelled. If the percentages are labelled so that the order by greater weight is evident, labelling the descending order by weight is not necessarily required.

Q 55 Where shall we label the country of origin for perishable food for professional use?

Answer

1 Countries of origin, when trading perishable foods for professional use, can be labelled not only on the container or package but also in invoices, delivery statements, etc., or specifications, etc.

2 In the case of labelling them in specifications, etc., it is necessary to be able to refer that the shipped and delivered products are based on which specifications, etc., on the container or package, or in invoices or delivery statements, etc.

IX Others

Q 56 For processed food in Appendix 15-1 to 5 (so-called “22 food groups and 4 items”), can And/Or Labelling, All Inclusive Labelling or “Production Country Labelling for Semi-Processed Ingredients” be used?

Answer

1 For the so-called “22 food groups and 4 items” that are required to be labelled for the country of origin prior to expansion of country of origin labelling to all processed foods, the supplying countries should be labelled in descending order by weight, as per the status quo. (except for the cases shown in Labelling Method-10 of Country of Origin Labelling (Appendix 15-1 to 6) attached to the Food Labelling Standards Q&A)

2 In addition, for “dried bonito flakes,” the production center of dried bonito has been labelled as the country of origin, and as a result of introduction of production country labelling of Semi-Processed Ingredients, it is changed to the term “Produced in xx.”

Q 57 Among the so-called 22 food groups (processed food in Appendix 15-1), if there are no perishable foods whose weight percentage in ingredients and food additives is 50% or greater, how should such food be labelled?

Answer

1 Label in the same way as for those not shown in Appendix 15.

2 Specifically, for the heaviest ingredient by weight in ingredients (the most predominant ingredient by weight), descending order of the supplying countries by weight is the general rule, and if it is difficult to do so, under fixed conditions, And/Or Labelling or All Inclusive Labelling, or labelling of the production country for Semi-Processed Ingredients will be permitted.

Q 58 “Nori for Rice Balls” is individually subject to the country of origin labelling requirements for ingredients. What is the scope of the “Rice Balls” and how shall we label the country of origin for ingredients?

Answer

1 For the purpose of providing information to consumers, “Nori for Rice Balls” is individually subject to the country of origin labelling for ingredients. “Rice Balls” in this case means cooked rice or cooked rice with other fillings are wrapped with nori (including the ones with the form allowing consumers to wrap nori by themselves).

2 For example, anything that consumers generally recognize as rice balls are included such as “products that have already been wrapped with nori when sold” or “products that are sold in the form allowing consumers to wrap nori by themselves before eating,” which can be found at convenience stores, etc.

3 The following products are not in the scope of the requirements.

(1) Products that are packed with “side dishes (accompanying dishes)” such as fried food or pickled radish in a container or package.

(2) Rolled sushi, gunkan-maki, or self-wrapping sushi, etc. which are categorized as sushi.

4 When selling rice balls at a place, where such rice balls are made or processed (so called in-store processed foods), such rice balls are outside of the scope of the requirements. This is the same condition as applied to other products subject to the country of origin labelling for ingredients.

5 For rice balls, the country of origin labelling for ingredients is required for nori, regardless of the order by weight, in addition to the greatest ingredient by weight* in the ingredients (the most predominant ingredient by weight).

Labelling supplying countries in descending order by weight is required and the And/Or Labelling and All Inclusive Labelling are not permitted.

In practice, since the country of origin of nori and algae are the same, countries of origin for ingredient of nori, that is algae, are to be labelled with brackets after the name of nori, such as ”Nori (Domestic)” or “Nori (Algae (Domestic))”

*It is required to label a supplying country for rice for general rice balls, in accordance with the provisions of the Rice Traceability Act.

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| <p>Q 59 In the case of voluntary labelling ingredients of products, where the country of origin labelling for ingredients is not required, how shall we label them on the container or package?</p> |
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Answer

1 Countries of origin for the greatest ingredient by weight in the ingredients (the most predominant ingredient by weight) are only subject to labelling of the country of origin for ingredients for processed food. It is, however, desirable to voluntary label countries of origin for the second or third greatest ingredients by weight.

2 In the case of the voluntary labelling of countries of origin for ingredients, labelling supplying countries in

descending order by weight is to be followed as a general rule. However, for the purpose of providing as much information as possible so providing consumers' opportunities for autonomous and rational choice of foods, the And/Or Labelling, All Inclusive Labelling, or "production country labelling for semi-processed ingredients" are acceptable under certain conditions, with the same manner as the mandatory labelling.

- 3 Even when labelling voluntarily, if there is any conflict with the laws relating to labelling such as the Food Labelling Act, such labelling is subject to supervision and penalties. Please label as clearly as possible based on the facts.

Q 60 Is it acceptable to voluntarily provide information regarding the countries of origin for ingredients on websites, etc.?

Answer

- 1 It is desirable to voluntarily and proactively provide information to consumers using the internet platforms regarding detailed information on supplying countries for any ingredients not being subject to the mandatory labelling, or when the And/Or Labelling, All Inclusive Labelling, or "production country labelling for semi-processed ingredients" to the container or package is adopted.
- 2 Even when labelling voluntarily, if there is any conflict with the laws relating to labelling such as the Premiums and Representations Act, such labelling is subject to supervision and penalties. Please label as clearly as possible based on the facts.

Q 61 How should a sudden change of country of origin for ingredients due to natural disaster or bad crop, etc., be handled?

Answer

- 1 At the time of the Great East Japan Earthquake in 2011 or the Kumamoto Earthquake in 2016, for labelling not according to the Food Labelling Standards, we handled matters so that it would not be subject to controls, except for sanitation matters, and the same kind of handling is expected for the similar cases in the future as well.
Also, as similar examples, import suspension measures, etc., due to outbreak of infectious disease of livestock can be considered but we consider it difficult to explain how this will be handled in advance with examples.
However, we will not exclude placing controls on malicious violations to cause misunderstandings in consumers.
- 2 When production center to be used is different from the labelling details as a result of change of suppliers of ingredients due to bad crop of agricultural products or fluctuation of exchange, etc., handle the matter by changing the country of origin labelling.

Q 62 What are the transitional measures applied for the expansion of the country of origin labelling for ingredients for all processed foods?

Answer

1 There will be a period for transitional measures, which will allow promotion to raise consumer awareness and preparation for switching labelling by businesses.

2 The period for transitional measures will be from the effective date of the Amended Food Labelling Standards (September 1, 2017) until the end of March 2022. Any processed foods for general use produced and perishable foods or processed foods for professional use sold during this period can be labelled in accordance with the provisions set either before or after the Amended Act, though those after this period may not be labelled in accordance with the provisions set before amendment.

Once any of the following arrangement has been completed, processed foods for professional use labelled in accordance with the Food Labelling Standards before amendment are allowed to be sold after the period for transitional measures.

(1) If labelled on the container or package of the food, the labelling that meets the requirements under the Amended Food Labelling Standards is created in the form of a sticker, which is then attached to the container or package.

(2) If stated in the specifications, etc., those specifications, etc. that meet the requirements under the Amended Food Labelling Standards are submitted to the distributor after collecting (or making arrangement to dispose of) old specifications, etc.

(See Supplementary Provision -4 of the Food Labelling Standards)

3 Please quickly switch to the labelling compatible with the new labelling requirements for the country of origin for ingredients after the effective date of the Amended Act (September 1, 2017).

Q 63 Is product that is in the process of production at the production place or processing place when the Food Labelling Standards are in effect and then completed after the transitional measures period also subject to this labelling?

Answer

1 As the Cabinet Order to Revise a Part of the Food Labelling Standards (Cabinet Order No. 43 of September 1, 2017) is in effect, products that are in the process of manufacturing at the manufacturing place or processing place for processed foods and will be completed and sold after April 1, 2022 are not covered, and labelling may be done under any of the provisions before or after revision. Specifically, liquors and fruit vinegars, etc. are viewed thusly.

2 For example, for whiskey aged at a distillery at the time of enforcement, the country of origin labelling is unnecessary.

In addition, even if this whiskey is blended with other whiskeys, country of origin labelling is unnecessary.

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| <p>Q 64 How do you plan to work on public awareness for consumers on the introduction of this new country of origin labelling for ingredients?</p> |
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Answer

The system of the country of origin labelling for ingredients for processed food has been significantly changed this time. There are some new labelling methods such as the And/Or Labelling in addition to the labelling of “supplying countries in descending order by weight” being as a general rule. It is acknowledged that government together with related organizations must cooperate from now on to engage in dissemination activities from multiple angles so that consumers have better understanding of such labelling methods.

It is expected that the same named products with the country of origin labelling for ingredients as the “labelling of supplying countries in descending order by weight,” And/Or Labelling, All Inclusive Labelling, and “production country labelling for semi-processed ingredients” could possibly be sold through shops.

It is important to engage in activities to disseminate this new system to relevant parties so that consumers can properly understand the new labelling, and we, together with relevant organizations, will proactively engage in dissemination activities by making brochures and holding information seminars.

It is expected that businesses will comply with the “labelling of supplying countries in descending order by weight” as a general rule, as well as that consumers would make efforts for better understanding of the new system for country of origin labelling for ingredients of processed foods.