



H.E. Mr. Chikara Sakaguchi
Minister of Health, Labour and Welfare
1-2-2 Kasumigaseki,
Chiyoda-ku, Tokyo 100-8916

August 2002

Re: Food additives

Dear Minister,

The European Business Community (EBC) is the trade policy arm of the combined European chambers of commerce in Japan and represents the interests of over 3,000 European firms doing business in Japan. European food producers take great pride in the quality of their products, and understand very well concerns regarding food safety that have gripped Japan in recent months.

The issue of food additives in particular has become a major problem after it was discovered that a number of firms were using flavouring solvents and other additives currently not allowed in Japan, but nonetheless – as your Ministry very publicly stated – posed no risks to human health. The subsequent publicity that this discovery received has thrown the Japanese food market into a state of confusion.

It is our understanding that the MHLW is currently reviewing the regulations governing acceptable food additives in Japan and will soon make recommendations to the Council on Drug and Food Sanitation.

As you know, there still remains a very large number of additives that are commonly used in foods in Europe, the United States and other parts of the world that are still not permitted in Japan. We very much appreciate your Ministry's recent decision to approve the use of sodium ferrocyanide as a food additive, and hope that the MHLW will take immediate steps to bring Japanese food safety standards further in line with international best practice.

In principle, the EBC feels that Japanese food additive regulations should ultimately fully reflect the well-established work of the CODEX ALIMENTARIUS commission and other international entities such as the Joint Expert Committee on Food Additive and Contaminant of the FAO/WHO (JECFA), an independent scientific body. Food additives approved by CODEX have been subjected to rigorous scientific scrutiny, and are recognized as being safe according to widely accepted international scientific standards.

Unfortunately, many of the substances accepted as being safe by CODEX are currently not allowed in Japan.

While the EBC very much urges the MHLW to take a comprehensive approach towards the modernization of the list of acceptable food additives in Japan, we also recognize the fact that approving certain additives (such as recently accepted sodium ferrocyanide) may be of more immediate concern than others. With this in mind, the EBC is currently developing a list of substances that we feel should receive priority attention for inclusion on the list of acceptable food additives in Japan, which we hope to share with your Ministry by the end of September.

In closing, I would like to reiterate the EBC's commitment to food safety in Japan. The EBC urges the MHLW to take swift measures to modernize its food additive regulations with the dual goal of alleviating consumer anxiety and providing clear guidance to food producers based on widely accepted international scientific standards.

Yours sincerely,

Richard Collasse,
Chairman,
European Business Community in Japan.

CC: Mr. Andrew Mankiewicz,
Chairman,
EBC Food Committee.

Mr. Nigel Evans,
Chargé d'affaires,
Delegation of the European Commission in Japan.

Mr. Yasunori Yoshida,
Deputy Director,
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