



**The European Business Council
FOOD COMMITTEE**

Food Labeling Position Paper

The European Business Council in Japan (EBC) calls on the Government of Japan to exercise caution when drafting a policy response to recent cases of severe mismanagement, false labeling and other incidents related to food products. Japan is dependent on the smooth importation of more than 60% of its food supply. It is therefore necessary that new food safety regulations, if introduced, adhere to international guidelines set forth in CODEX, ISO and HACCP.

Background:

A number of incidents in the Japanese food industry involving mislabeling, negligence, and possible sabotage have led to a debate on how to best ensure the quality of food products sold on the Japanese market. The EBC fully understands this concern and believes that correct application of internationally established best practices could improve the information available on food products to consumers and enhance consumer protection. The EBC further welcomes renewed efforts on the part of the Cabinet Office, the Ministry of Health Labor and Welfare (MHLW), and the Ministry of Agriculture, Fisheries and Food (MAFF) to streamline food labeling regulations. The EBC, however, urges the Government of Japan not to overreact to isolated cases of mismanagement by introducing new potentially impractical and ineffective restrictions.

Recommendations:

1. The EBC believes that displaying the date of manufacture on labels should be only on a voluntary basis. Introducing a mandatory system could create a significant disadvantage for products with long transport times to Japan as it may cause consumers to focus only on the production dates, rather than on quality and safety.
2. A requirement to display the country of origin for ingredients would be impractical, as food manufacturers increasingly need to change ingredient suppliers (and countries) due to quality variation and restricted availability. Also, a product may have 10 or more ingredients making it impractical and cumbersome to put the country of origin for each ingredient. Furthermore,

there may simply not be enough space on a label to display all of this information as well as making it more difficult for the consumer to read. Finally, superfluous labeling requirements would result in increased cost and complexity, either pushing up food prices further or forcing suppliers/importers out of the market.

3. There are reports that the Food Sanitation Law may be revised to mandate that an analysis be conducted by food importers on all food products each time the products are imported into Japan. Such a requirement would place excessive costs and administrative burden on importers and would make most imported products exorbitantly expensive, thereby resulting in possible market withdrawal of many products. Food importers are already held solely responsible for the safety of the food they import. As such, importers should be able to supply Quality Assurance (QA) certificates or reports from their suppliers at anytime and new tests are simply superfluous.