



A Review of Food Nutrition Labeling in Japan

Yoshihisa Godo
Professor, Meiji Gakuin University, Japan

INTRODUCTION

For years, food nutrition labeling had not been compulsory in Japan. In response to consumers' increasing concerns about food safety, however, the Japanese government, which many perceive as the slowest among major advanced countries, introduced a compulsory nutrition labeling system in April 2015. This review aimed to describe Japan's new system of nutrition labeling.

Nutrition labeling under the Health Promotion Act

In 2003, based on Article 31 of Japan's Health Promotion Act (HPA), the Ministry of Health, Labour and Welfare (MHLW) presented a guideline for food nutrition labeling. It was not compulsory for producers to include nutrition labels. However, if a producer wanted to include nutrition labels, it must follow this guideline.

The guideline applies to all processed foods. It stipulates the format for labeling values of seven items: calorie, protein, fat, carbohydrate (or available carbohydrate and dietary fiber), sodium, vitamins, and mineral content. Among them, vitamins and minerals could be omitted from the label. The remaining five items must be clearly shown on the label¹⁾. The unit of measure should be per 100 g, 100 ml, one package, one meal, or some other appropriate unit of edible part of food. If the quantity of the constituent was less than a certain value stipulated by the MHLW, the producer is allowed to describe the quantity as zero.

A problem in nutrition labeling is that there is variance in estimating the quantity of the constituent. In the MHLW's guideline of 2003, if the upper boundary value of estimation was >20% higher than or if the lower boundary value of the estimation was <20% of the average estimation, the upper and lower boundary values of estimation should be shown on the label. In other cases, the food producer is allowed to show only the average estimated value.

If food producers want to include additional information on the nutrition label for items other than the aforementioned seven items, they are allowed to do so by showing it separately from

the food label. Examples of food labeling under the HPA are shown in Figures 1-1 and 1-2.

Figure 1-1. An example of nutrition labeling under the Health Promotion Act (1)

Nutrition information per container (100 g)			
Energy			kcal
Protein			g
Total fat			g
Carbohydrate			mg
Sodium			mg
Polyphenol			mg

Source: Shinzo (2010), with the author's translation from Japanese to English.

Figure 1-2 An example of nutrition labeling under the Health Promotion Act (2)

Nutrition information per three pills (300 g)		
Energy	~	kcal
Protein	~	g
Total fat	~	g
Available carbohydrate	~	g
Dietary fiber	~	g
Sodium	~	mg
Vitamin A	~	μg
Polyphenol	~	mg

Source: Shinzo (2010), with the author's translation from Japanese to English.

Reform of the food labeling policy after the Consumer Affairs Agency was established

As a new authority responsible for consumer affairs, the Consumer Affairs Agency (CAA) was established in 2009. Simultaneously, the responsibility of enforcing the regulations of nutrition labeling was transferred from the MHLW to the CAA. In addition, the CAA started discussion on reforming the general framework of the food labeling policy. For years, the laws of food labeling regulations had not been unified² The HPA, Food Sanitation Act (FSA),

and Japanese Agricultural Standards (JAS) Act enforced regulations on food labeling³ (note 3). There were both discrepancies and overlapping information among these regulations. This caused confusion among food producers and consumers. Thus, to employ a more systematic approach to food labeling regulations, the CAA designed a single law, called the Food Labeling Act (FLA). The bill for the FLA passed the Diet in June 2013 and became effective on April 2015. Simultaneously, all regulations of the HPA, JAS Act, and HPA for food labeling were replaced by new ones under the FLA.

Nutrition labeling under the FLA

Instead of the HPA, the FLA became the basic law for nutrition labeling in April 2015. Under the FLA, nutrition labeling is compulsory for all processed foods. Fresh foods and meals in restaurants are not required to have nutrition labels. In addition, small-sized food producers and those who are not involved in the food businesses are exempted from posting nutrition labels on their food commodities. Even for large-sized food producers, the following seven types of processed foods are allowed to sell or promote their products without nutrition labels (1) foods that are unimportant sources of nutrition (e.g., water and spices), (2) foods that should be used as ingredients for further food processing, (3) liquors, (4) foods whose packages are too small to have labels, (5) foods whose recipes should be changed all the time, (6) foods that should be consumed at the site where they are processed, and (7) foods that should be used for school or hospital meals. The following details the food labeling regulations under the FLA.

(a) The list of nutritional contents

The values of calorie, protein, total fat, carbohydrate, and salt contents must be shown on nutrition labels. It is recommended (not compulsory) to show values of saturated fatty acid and dietary fiber on nutrition labels. It is optional for food producers to show the values of vitamins, minerals (excluding sodium), trans-unsaturated fatty acids, and cholesterol on nutrition labels.

(b) Salt content

It is widely recognized that excessive salt is one of the major problems of traditional Japanese eating habits. Previously, under the HPA, salt content was expressed by the quantity of sodium. The following relationship exists:

The quantity of salt (g) = the quantity of sodium (mg) \div 1,000 \times 2.54.

However, most Japanese consumers do not know this relationship. To make nutrition labeling more consumer-friendly, the FLA requires food producers to show the quantity of salt content instead of sodium.

(c) Nutrition claims

Nutrition claims such as zero or low for some unhealthy constituents and contained or high for healthy constituents are popular ways to promote food commodities. To prevent food producers from misleading consumers by exaggerated expressions, the FLA has a guideline for nutrition claims. In principle, the FLA does not allow food producers to make nutrition claims if the difference from the standard value is <25% of the standard value, which is consistent with Codex’s guideline.

(d) Errors in estimating the quantity of constituents

Previously under the HPA, if the estimation error distributes >20% or <20% of the average estimation, the average and upper and lower boundary values were required to be shown on nutrition labels. Under the FLA, however, food producers are allowed to only show the average value of estimation as long as the methodology of estimation is shown.

Japan’s nutrition labeling compared to other developed countries

Figures 2-1 and 2-2 are examples of nutrition labels under the FLA. Many researchers point out that the list of required information in nutrition labeling in Japan is not as adequate as that in major foreign countries. Shinzo’s comparative study among major countries in 2009 clearly showed the limitation of Japan’s nutrition labeling system (Table 1)⁴ (note 4).

As previously discussed, there have been improvements in nutrition labeling by replacing the HPA with the FLA. However, it should be argued that there still remains room for improvement in today’s nutrition labeling system in Japan⁵.

Figure 2-1	An example of nutrition labeling under the Food Labeling Act (1): a case of only showing items the law requires							
	Nutrition information							
	Per container (100 g, 1 ml, 1 meal [the quantity of one meal should be shown], 1 package, or other)							
	Energy			kcal				
	Protein			g				
	Total fat			g				
	Carbohydrate			g				
	Salt equivalent			g				
Note:	The lines showing the outer edges are allowed to be omitted if it is difficult to draw them.							
Source:	Morita (2014), with the author's translation from Japanese to English.							

Figure 2-2 An example of nutrition labeling under the Food Labeling Act (2): a case of showing items the law allows as an option in addition to those the law requires

Nutrition information per container (100 g, 1 ml, 1 meal [the quantity of one meal should be shown], 1 package, or other)	
Energy	kcal
Protein	g
Total fat	g
- Saturated fat	g
Cholesterol	mg
Carbohydrate	g
- Available carbohydrate	g
- Sugar	g
Salt equivalent (Sodium)	g, mg
Other ingredients (Minerals and vitamins)	mg, µg

Notes:

1. Items that the Food Labeling Act does not require are allowed to be omitted.
2. Lines showing the outer edges are allowed to be omitted if it is difficult to draw them.
3. "-" is used to show breakdowns.

Table 1 International comparison of nutrition labeling as of October 2009

	Energy		Protein		Total fat			Carbohydrate			Cholesterol	Salt equivalent (sodium)	Vitamins	Minerals
					Saturated fatty acid	Trans fat	Unsaturated fatty acid		Sugar	Dietary fiber				
Japan	△	△	△					△				△		
United States	○	○	○	○	○	○	△	○	○	○	○	○	○	○
EU27	○	○	○	○	○		△	○	○	○	△	○	○	○
Australia & New Zealand	○	○	○	○	○		△	○	○	○		○	○	○
Korea	○	○	○	○	○	○	△	○	○	○	○	○	○	○
China	○	○	○					○	○		○	○	○	△
Switzerland	○	○	○	○				○		○		○	○	○
Thailand	○	○	○	○	○		△	○	○	○	○	○	○	○
Mexico	○	○	○	○	○	○	△	○	○	○	○	○	○	○
India	○	○	○	○	○	○	△	○	○	○	○	○	△	△
Brazil	○	○	○	○	○	○	△	○	○	○	○	○	○	○
Malaysia	○	○	○	○	○	○	△	○	○	○	○	○	○	○
Peru	○	○	○	○	○	○	△	○	○	○	○	○	○	○
United Arab Emirates	○	○	○	○	○	○	△	○	○	○	○	○	○	○
Argentina	○	○	○	○	○	○		○		○	○	○	○	○
Ukraine	○	○	○					○				△		
Russia	○	○	○					○				△		
Turkey	○	○	○	△	△	△	○	△	△	△	△	△		
Hong Kong	○	○	○	○	○	△	○	○	○	○	○	○	△	△
Taiwan	○	○	○	○	○	○	△	○	○	○	○	○	○	○
Canada	○	○	○	○	○	△	○	○	○	○	○	○	○	○

○: compulsory (quantity of the item should be shown in a designated format as compulsory food labeling)
△: voluntary (quantity of the item should be shown in a designated format as voluntary food labeling)

Source: Shinzo (2010), with the author's translation from Japanese to English.

Footnotes

- 1) If the quantity of any of the five items (i.e., calorie, protein, fat, carbohydrate, fat, and sodium content) is less than a certain value stipulated by the MHLW, it should be labeled as zero instead of omitting the items from the label.
- 2) Details of the food labeling system before the FLA was enforced are referenced by

Morita (2014) and the Asia-Pacific Information Platform on Agricultural Policy (http://ap.fftc.agnet.org/ap_db.php?id=403).

3) The formal name of the JAS Act is the Act on Standardization and Proper Labeling of Agricultural and Forest Products.

4) Shinzo (2010).

5) Shinzo's study shows that Nutrition labeling in Japan in 2015 is not as adequate as that in major countries in 2009. In addition, many countries have continued improving their nutrition labeling systems over the past six years.

REFERENCES

Morita, Maki. 2014. *Shokuzai Giso* (Food Mislabeling), Tokyo: Gyosei.

Shinzo, Tokio. 2010. *Shokuhin Hyoji no Kiso Chishiki* (Basic Knowledge of Food Labeling), Tokyo: Saiwai Shobo.

Date submitted: June 28, 2015

Reviewed, edited and uploaded: June 29, 2015