

Concept on New Country of Origin
Labeling System for Ingredients
(Supplementary Document)

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Consumer Affairs Agency

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1 Which processed foods would be subject to the mandatory country of origin labeling for ingredients?

- 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 labeling 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 labeled as imported products. The country of origin labeling for ingredients is not required.

- 2 The following cases do not require the country of origin labeling for ingredients, which is the same procedure for labeling requirements, etc. for ingredients.
 - When setting up a facility to provide food and drinks (eating out)
 - When selling food products at a place, where such products are made or processed (so called in-store processing)
 - When distributing to an unspecified or a large number of people (excluding selling)
 - When selling food without containers or packages

Labeling the country of origin for ingredients can be avoided in the following case.

- When the area on the container or package where labeling could be placed is 30cm² or less

2 What types of ingredients would be subject to mandatory labeling?

- 1 With respect to providing information to consumers, it is desirable to include as many ingredients as possible for mandatory labeling. However, having considered the feasibility of implementation by businesses, the largest ingredient by weight in the ingredients (the most predominant ingredient by weight) is subject to mandatory labeling, for which the name of the ingredient and its country of origin are required to be labeled.

However, the following items have separate standards, which provide with the ingredients that are subject to mandatory labeling.

- For pickled agricultural products, top 4 (or 3) predominant ingredients, which constitute 5% or more
- For frozen vegetable products, top 3 predominant ingredients, which constitute 5% or more
- For processed eel products, eel
- For dried bonito flakes, dried bonito
- For rice balls, nori

2 In the case where the country of origin of the most predominant ingredient by weight is labeled under the following laws, the provisions for the country of origin labeling for ingredients in the Food Labeling 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)

② Act Concerning Liquor Business Associations and Measures for securing Revenue from Liquor Tax (Act No. 7 of 1953)

As of XX(Month), 2017, the Production Method and Quality Labeling Standards for Fruit Alcoholic Beverages, etc. (National Tax Agency Notice No. 18 of 2015) have been adopted as labeling standards under

②.

3 Are food additives subject to the country of origin labeling for ingredients?

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

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

2 Therefore, even if a food additive is the most predominant ingredient by weight in a particular food, the said food additive is not required to be labeled. The largest ingredient by weight in the ingredients (the most predominant ingredient by weight) is subject to the labeling requirements.

Any food consisting of only food additives is not required to have such labeling.

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

4 What is a basic labeling method used for ingredients classified as perishable food, for which supplying countries in descending order by weight are labeled as a general rule?

1 For any ingredients domestically produced and for any imported ingredients, these should be labeled “indicating that it is domestically produced” and “countries of origin,” respectively.

2 In the case of ingredients being domestically produced, in addition to indicating that they are domestically produced, the following labeling is accepted.

① If the ingredients are agricultural products:

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

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 can be labeled, which is the same procedure for agricultural products.

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 labeled.

3 If ingredients are imported fishery products, the name of the waters can also be labeled 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 labeled 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 labeled. 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 labeling examples. (Any of examples 1 to 3 is acceptable.)

<<Example 1: Labeling 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, USA (pork)
Net	150 g
Expiration date	March 31, 2017
How to store	Store at 10°C or below
Producer	XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo

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

Name	Pork sausage (wiener)
Ingredients	Pork (Canada, 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	March 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 labeling in the collective labeling column is not possible, the labeling can be shown somewhere else>>

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	March 31, 2017
How to store	Store at 10°C or below
Producer	XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo

Product Name
Countries of Origin of Pork as Ingredients
Canada, USA

<<Inappropriate Labeling 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 labeling only the country of origin in the country of origin column may not make it apparent as to which ingredient is derived from the said country of origin.



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, USA
Net	150 g
Expiration date	March 31, 2017
How to store	Store at 10°C or below
Producer	XX Co., Ltd. X-Y-Z Kasumigaseki, Chiyoda-ku, Tokyo

5 Which case is permitted for the “possible suppliers labeling” (labeling 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 Labeling Standards)?

1 For the purpose of providing information to consumers, the labeling of supplying countries in descending order by weight is a general rule. The “labeling of possible suppliers” is, however, permitted only if the order by weight and supplying countries of a product are expected to be changed within a year including at a time when the new labeling is expected and when labeling supplying countries in descending order by weight in consideration of the past records on ingredients use by supplying country (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) over a defined period of time, and only if it is going to be difficult to label supplying countries in descending order by weight.

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

- ① Documents indicating that the changes of the order of supplying countries by weight and changes of supplying countries over a defined period of time
- ② Documents indicating the order of the ingredient ratio by country of origin for the said period of time

2 The past records on ingredients use by supplying country must cover at least a period of one year within three years prior to the year of production. (See Example 1)

3 As a general rule, the labeling of possible suppliers is based on the past records on ingredients use by supplying country. 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 labeling of possible suppliers is permitted based on the future usage plans for ingredients by supplying country.

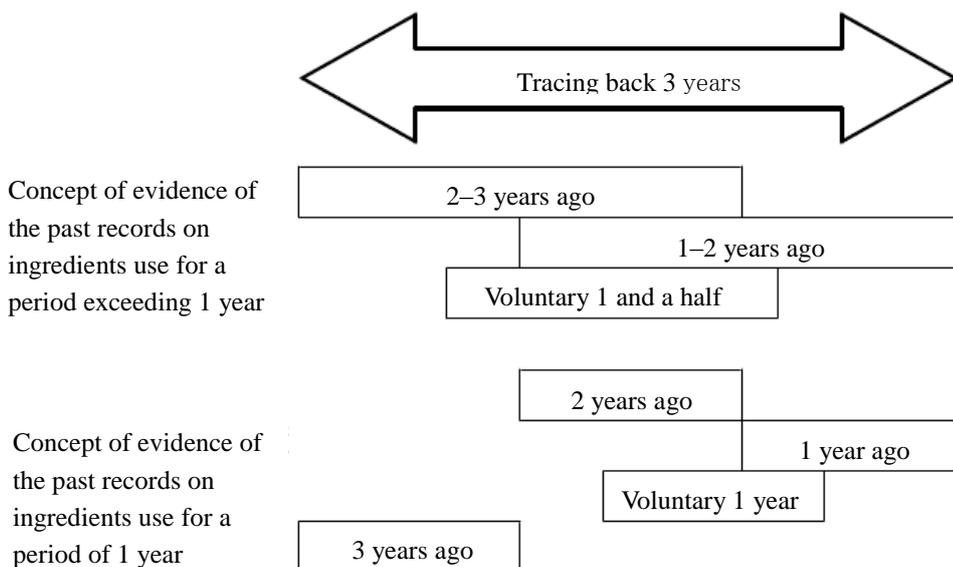
The future usage plan by supplying country must be a plan set one year or less from the scheduled start date of production based on the said plan. The labeling of possible suppliers based on the said plan is not permitted for a product made outside the planning period. (See Example 2)

4 The labeling of possible suppliers 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 labeling is not applicable.

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

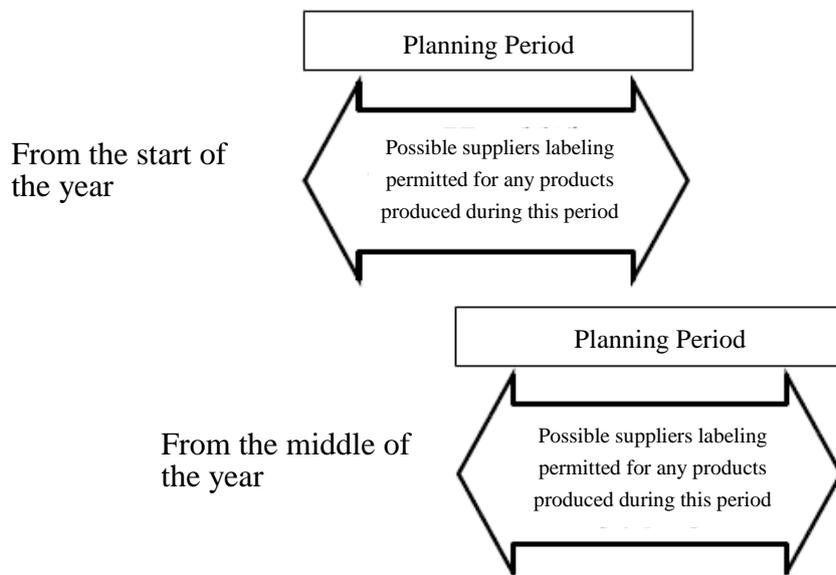
(Example 1: Concept of “the past records on ingredients use,” which can be used as evidence)

2013	2014	2015	2016	2017 Production Year	2018
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(Example 2: Labeling using Usage Plans)

2016	2017	2018	2019
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6 What is a basic labeling method used for the “possible suppliers labeling”?

1 The “possible suppliers labeling” 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 They mean the following 4 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 labeling means the use of the ingredient can only be permitted within the scope of labeled countries. It is not permitted to use an ingredient whose supplying country is not labeled. Therefore, if the actual product includes an ingredient supplied by Country C, the labeling 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 labeling can only be the order based on the past records on ingredients use for periods

illustrated in Section 5 above. For example, if it is considered difficult to label supplying countries in descending order by weight based on the past records on ingredients use of 2015, the order of countries should be listed based on the past records on ingredients use of 2015. The names of countries cannot be labeled in the order of ingredients use in other periods.

2 If there are 3 or more countries of origin for an ingredient, the third country and beyond can be labeled as “others,” which is the same procedure for labeling supplying countries in descending order by weight.

For example, if labeling “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 It is required always to include a warning to indicate that such labeling is based on the past records on ingredients use on the container or package, together with the country of origin labeling. (See 12 below)

<<Example 1: A case of 2 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	March 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 2 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	March 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 3 supplying countries>>

Name	Dark Soy Sauce (Naturally Brewed)
Ingredients	Soybeans (USA or Canada or Brazil), Wheat, Salt
Net	400ml
Expiration date	September 30, 2017
How to store	Store at room temperature away from direct sunlight.
Producer	XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo

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

<<Example 4: A case of 3 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	March 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

7 When using the “possible suppliers labeling,” in order to prevent information being misleading to consumers, how can we list a supplying country, for which in the past records on ingredients use, the ingredient ratio used in the specific product is significantly small?

When using the “possible suppliers labeling,” the “possible suppliers labeling” will display countries based on the past records on ingredients use, etc. 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.

In order to prevent any information from being misleading to consumers, 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 Including when the “possible suppliers labeling” is used in the “all inclusive labeling + possible suppliers labeling” and “production country labeling for semi-processed ingredients,” in the case of the “possible suppliers labeling,” 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%.
- ③ A warning is required to be shown that the percentage composition is based on the past records on ingredients use, etc.

<<Example: A case of “Possible Suppliers Labeling” 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	September 30, 2017
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 past records on ingredients use in 2015

8 Which case is permitted for the “all inclusive labeling” (labeling 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 Labeling Standards)?

How long can source documents for the all inclusive labeling be used as evidence?

1 For the purpose of providing information to consumers, the labeling of supplying countries in descending order by weight is a general rule. The “all inclusive labeling” is, however, permitted only if the order by weight and supplying countries of a product are expected to be changed within a year for the labeling of the ingredient originating from three or more foreign countries including at the time when the new labeling is expected and when labeling supplying countries in descending order by weight in consideration of the past records on ingredients use by supplying country (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) over a defined period of time, and only if it is going to be difficult to list supplying countries in descending order by weight.

In addition to the above, retention of documents indicating that the changes of the order of supplying countries by weight and changes of supplying countries over a defined period of time is a required condition.

2 The past records on ingredients use by supplying country must cover at least a period of one year within the three-year period prior to the year of production. (See Example 1)

3 As a general rule, the all inclusive labeling is based on the past records on ingredients use by supplying country. In the cases of a new product or of the change of the purchasing countries for the ingredients being very likely, where the past records on ingredients use by supplying country cannot be used, the all inclusive labeling is permitted based on the future usage plans for ingredients by supplying country.

The future usage plan 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 labeling” based on the said plan is not permitted for a product made outside the planning period. (See Example 2)

4 The all inclusive labeling 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 labeling is not applicable.

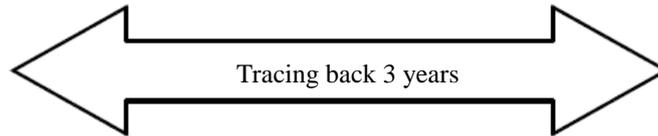
5 The "ingredient originating from three or more foreign countries" means several imported countries from the Northern and Southern Hemisphere depending on the season so that a particular agricultural product, for example, could be procured consistently throughout the year. As the result, it is assumed 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 labeling," even though the procurement circumstances for the ingredients allow the listing of the names of supplying countries in descending order. (See Example 3)

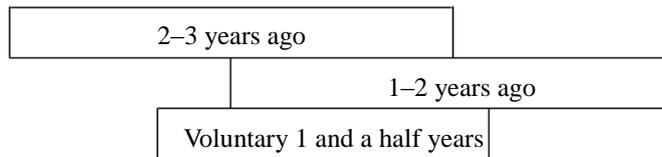
6 Site inspections to businesses by government or local government will confirm whether or not the labeling is properly implemented for the country of origin labeling for ingredients. Interviews will be conducted to check the reasons for the all inclusive labeling, etc. Source documents, which should 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)

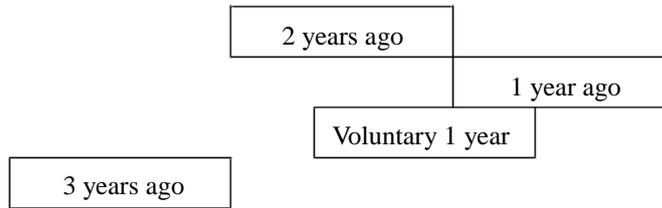
2013	2014	2015	2016	2017 Production Year	2018
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Concept of evidence of the past records on ingredients use for a period exceeding 1 year



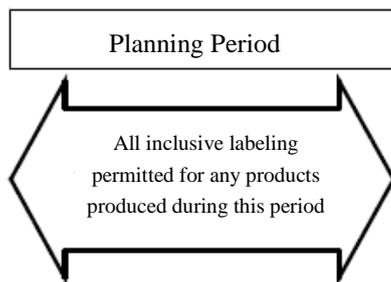
Concept of evidence of the past records on ingredients use for a period of 1 year



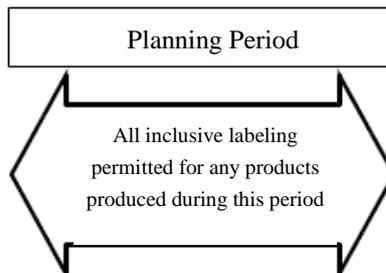
(Example 2: Labeling using Usage Plans)

2016	2017	2018	2019
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From the start of the year



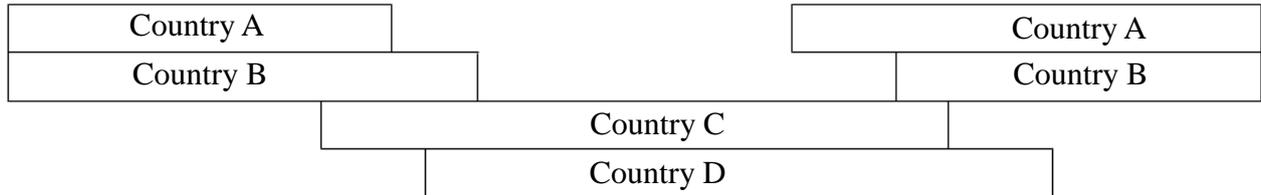
From the middle of the year



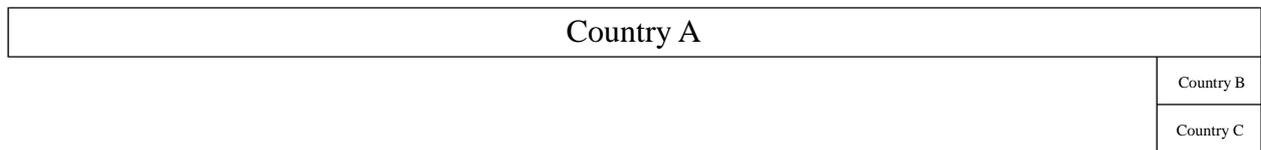
(Example 3)

Jan	Feb	Mar	Apr	May	June	July	Aug	Sep	Oct	Nov	Dec
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(An envisaged case)



(A case not envisaged)



9 What is a basic labeling method used for the “all inclusive labeling”?

1 The “all inclusive labeling” is a labeling method for bundling foreign supplying countries together in a category classed as “import.”

The labeling as "import" indicates that, in relation to the labeling of origin of three or more foreign countries, the order by weight and supplying countries are expected to be changed or switched within the year set by the business on the basis of the past records on ingredients use by supplying country over a defined period of time.

The labeling as “import, domestic” indicates that, in relation 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,” “oversea product,” and “overseas,” and others.

<<Example 1: A case of the ingredient originating from 3 or more foreign countries>>

Name	Dark Soy Sauce (Naturally Brewed)
Ingredients	Soybeans (Import), Wheat, Salt
Net	400ml
Expiration date	September 30, 2017
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	September 30, 2017
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	September 30, 2017
How to store	Store at room temperature away from direct sunlight.
Producer	XX Co., Ltd. X-Y-Z Nagata-cho, Chiyoda-ku, Tokyo

10 Which case is permitted when using both “all inclusive labeling” and “possible suppliers labeling” in combination (“import or domestic” or “domestic or import”)?

- 1 The combined application of the "all inclusive labeling" and “possible suppliers labeling” is permitted only if the order by weight and supplying countries of a product are expected to be changed within a year including at the time when the labeling of "import" and "domestic" is expected and when labeling all inclusive suppliers in

consideration of the past records on ingredients use by supplying country (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) over a defined period of time, and only if it is going to be difficult to label all inclusive suppliers.

2 This means that, in addition to meeting the conditions permitted for the “all inclusive labeling” in Section 8 above, there is a change for the order by weight for the imported ingredients (total) and domestic ingredients during the same period and if it is going to be difficult to display such labels with “import, domestic,” or “domestic, import.”

(Example: A case, where the combined application of “all inclusive labeling” and “possible suppliers labeling” 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

11 What is a basic labeling method used for a case using both “all inclusive labeling” and “possible suppliers labeling” in combination (“import or domestic” or “domestic or import”)?

1 The combination of the “all inclusive labeling” and “possible suppliers labeling” is a method listing “import” and “domestic” in descending order by weight based on the past records on ingredients use, which are connected with “or.”

For example, when labeling “Import or Domestic,”

- ① They mean the following 4 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 on ingredients use, 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 to consumers, it is always required to include a warning on the container and package that such labeling is based on the past records on ingredients use, together with the labeling of countries of origin. (See Section 12 below)

<<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	March 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

12 What expression is acceptable for a warning to indicate that such labeling is based on the past records on ingredients use in the “possible suppliers labeling” and “all inclusive labeling + possible suppliers labeling?” How long does the record have to be in order to be recognized?

1 For a warning for the "possible suppliers labeling" and "all inclusive labeling + possible suppliers labeling,"

when labeling the order based on the past records on ingredients use by supplying country over a defined period of time, it is required to be shown so that consumers will know that the "labeling is not the order of the supplying countries by weight but the order based on the past records on ingredients use" together with the period of the said records. The following are specific examples:

- 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 or the past records from two years ago
- ④ 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
- ⑤ Countries of origin for XX and the order are based on the past records of the period from September 2015 to August 2016.

As noted in Section 5, the period that can be tracked back is within 3 years from the production year (the year which the production date belongs to). 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.

2 The followings are examples of notes for labeling 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 labeled based on the usage plans of 2017
- ② Countries of origin for XX and the order are labeled based on the assumption from the contracted farming from June 2017 to May 2018
- ③ Countries of origin for XX and the order are labeled based on the usage plans of 2017. Continuous labeling, 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.

3 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 Heisei)

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.

Labeling 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 labeling is continued, please check whether or not it is misleading labeling.

- 4 The notes described above are labeling examples. Please be creative in articulating country of origin labeling for ingredients of the said product is based on.

13 What types of documents should be retained for the “possible suppliers labeling,” “all inclusive labeling” or “all inclusive labeling + possible suppliers labeling?”

- 1 In the case of the “possible suppliers labeling,” “all inclusive labeling” or “all inclusive labeling + possible suppliers labeling,” as evidence confirming that this labeling is permitted for the ingredients,

- it is required to retain documents showing that a change of the order of countries of origin by weight or a switch of supplying countries is expected during the period set by the businesses through methods permitted in Sections 5 and 8 above for the ingredients used in the said product.

For the “possible suppliers labeling” and “all inclusive labeling + possible suppliers labeling,” in addition to the above documents,

- retention of documents showing the order of usage percentage by countries of origin in the ingredients (the total of imported products and domestic products for a case of the "possible suppliers labeling + all inclusive labeling") during the said period (a period that the note is indicated for)

is required.

- 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 to③, 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 considered reasonable as evidence for labeling 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 of ingredients use at the time of producing the products.

14 When labeling based on the usage plan, what level of legitimacy is required for the usage plan?

1 When labeling based on the usage plan, and if (i) the actual usage results are significantly different and no legitimate explanation is given; and (ii) no legitimate explanation is given for the basis of setting the plan, the said usage plan is not considered as a source for labeling.

- ① A case of the actual usage results being significantly different can be when labeling the third country and beyond among three or more supplying countries as "others," the majority of ingredients ended up being supplied by countries being categorized as "others." This case is problematic because the label does not provide any names of supplying countries.

(Examples of the actual usage results being significantly different)

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

- 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 diseases 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, 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 labeled 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 countries where the ingredient will be used are listed vaguely.)
- 2 When labeling based on the past records on ingredients use are significantly different (such as a case, where the predominant supplying country was, in fact, in the “Others”) with no legitimate explanation given for such labeling, which is the same circumstance as 1, such records on ingredients use are not regarded as evidence for the labeling.

15 Should source documents, etc. for the “possible suppliers labeling” and “all inclusive labeling, etc.” be retained?

How long should these source documents, etc. for the “all inclusive labeling” and “possible suppliers labeling, etc.” be retained for?

- 1 As one of the conditions for the “possible suppliers labeling” and “all inclusive labeling,” 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 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 1 year from the expiration (best-before) date on the product, whose label is written based on such evidence
 - ② 5 years from the production date, if the expiration date is not displayed or omitted.
- 3 If continuing with the “possible suppliers labeling” and “all inclusive labeling,” the current used percentages, etc. by supplying country will be used as the previously used records. Please retain these documents considering this factor.

16 In which case of the country of origin labeling for ingredients is considered for the production country labeling?

1 Production methods for processed foods can vary. They can be coherently produced at a company's own factory from perishable ingredients or produced using semi-processed ingredients manufactured at a factory of a different company, even for the same named product. For these semi-processed ingredients, the country of origin labeling for ingredients should, as a general rule, label the country of origin for the ingredient used regardless of whether they are perishable ingredients or semi-processed ingredients, in the context of the following:

- it is difficult to track back countries of origin for perishable ingredients used
- it has always been the case that for labeling of the ingredients then "ingredients used" would be shown regardless of whether they are perishable ingredients or semi-processed ingredients

On the other hand, in the case of the ingredient being a semi-processed ingredient, if a country of origin is labeled, this may mislead consumers as though the said country of origin is for a perishable ingredient. Thus, the country of origin for the said ingredient should be labeled as "produced in XX."

("Processed in XX" labeling is not permitted.)

2 If there are several countries to label as production countries, supplying countries in descending order by weight is to be labeled as a general rule and the words "produced in" must always be added for each country. (The labeling 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, for example, "Apples (Produced in Germany)" cannot be labeled as such because the labeling "Produced in XX" corresponds to the perishable ingredients.

3 If a country of origin for ingredients used for a semi-processed ingredient can be traced back to a perishable ingredient, instead of labeling "Produced in XX," the said country of origin can be labeled together with the said perishable ingredient.

4 The other labeling methods are the same as perishable ingredients. That means that "Produced in XX Prefecture" can be used for labeling instead of "Domestically Produced."

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

Name	Non-alcoholic beverage
Ingredients	Apple Juice (made in Germany), Fructose-glucose Syrup, Fructose/Acidifier, Vitamin C
Net	500ml
Expiration date	September 30, 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	Dorayaki
Ingredients	Pancake (Domestically Produced) (Eggs, Flour, Sugar), Tsubuan (Sugar, Azuki Beans, Malt Syrup, Agar) / Raising Agent
Net	1 Piece
Use by	March 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	Sliced Bread
Ingredients	Flour (Domestic), Sugar, Margarine, Yeast, Salt (partially contains Wheat and Dairy Product)
Net	6 Slices
Use by	Written in the front
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 labeling for semi-processed ingredients (Labeling 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	Produced in Germany (Apple Juice)
Net	500ml
Expiration date	September 30, 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: Labeling by tracing back the country of origin 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	September 30, 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 (Apples (produced in Germany, produced in Hungary)), Fructose-glucose Syrup, Fructose/Acidifier, Vitamin C
Net	500ml
Expiration date	September 30, 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: Labeling by tracing back the country of origin for semi-processed ingredients (Labeling 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	September 30, 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

17 What types of processed work are not being considered as “domestically produced” among processing work performed domestically for imported semi-processed ingredients?

- 1 For imported semi-processed ingredients, if there have been any “acts resulting in substantial changes to the contents of a product” at another domestic company and in the case where such ingredients are purchased and used as semi-processed ingredients, this is considered as “domestically produced.”
- 2 A notice “Unjustifiable Labeling on Countries of Origin of Products (Fair Trade Commission Notice No. 34 of 1973)” published in accordance with the Act against Unjustifiable Premiums and Misleading Representations (Premiums and Representations Act) states that the following acts are not considered as the “acts resulting in substantial changes to the contents of a product.”
 - ① To attach a label or other display onto a product
 - ② To pack a product in a container or package
 - ③ To simply assort products or combine them
 - ④ To assemble simple parts

In addition, the Directive on Customs Act (Notice of the Customs and Tariff Bureau of Ministry of Finance No. 100 of 1972) specifies that the following acts are not considered as acts affecting the change of countries of origin:

- ⑤ Simple cutting
- ⑥ Drying, freezing, soaking in brine or any other acts equivalent for transportation or preservation
- ⑦ Simple mixing

- 3 This is the same concept as applied for products being considered as “imported products” or not, which is specified in Article 3, Paragraph 2 of the Food Labeling Standards. “Imported products” in this case means:
- ① Any product, which is put in the container or package and sold to consumers as is (Products-as-imported)
 - ② Any products, which are imported in bulk and are subdivided in the container or package in Japan
 - ③ Any products-as-imported, which are assorted in Japan
 - ④ Any other imported products, where there have been no “acts resulting in substantial changes to the contents of a product” in Japan
- 4 Any cases of 2 and 3 above will not be considered as “domestically produced.”

Even in the case of acts other than those mentioned above, there may be acts such as sterilization, coloring, and flavoring, which do not fall into the category of any “acts resulting in substantial changes to the contents of a product.” (Specific judgment should be individually made.)

18 Are the “possible suppliers labeling” and “all inclusive labeling, etc.” permitted for the production country labeling for semi-processed ingredients?

- 1 For the purpose of providing information to consumers, the labeling of supplying countries in descending order by weight is required as a general rule for the production country labeling for semi-processed ingredients.
- However, if the labeling of supplying countries in descending order by weight in the case of labeling production countries proves to be difficult, the “labeling of possible suppliers,” “all inclusive labeling” and the combination of these two types of labeling would be permitted under certain conditions.
- The conditions permitted for such labeling are exactly the same as those for the perishable ingredients labeling. (See Sections 5 to 13 above)
- 2 For the “all inclusive labeling,” the labeling of “foreign produced” and “produced in overseas” is permitted but “imports produced” or “produced outside Japan” is not permitted as they do not clearly describe their meaning.

<<Example 1: “labeling of possible suppliers” for the labeling of production country>>

Name	Non-alcoholic beverage
Ingredients	Apple Juice (produced in Germany or domestically made), Fructose-glucose Syrup, Fructose/Acidifier, Vitamin C
Net	500ml
Expiration date	September 30, 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 labeling” for the labeling of production country>>

Name	Non-alcoholic beverage
Ingredients	Apple Juice (produced overseas), Fructose-glucose Syrup, Fructose/Acidifier, Vitamin C
Net	500ml
Expiration date	September 30, 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

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

- 1 Ingredients subject to the mandatory labeling of country of origin for ingredients are the ingredients individually specified in Appendix 4 in the Food Labeling Standards and are the most predominant ingredient by weight.
- 2 The labeling methods should be in accordance with Appendix 20 or Appended Form 1 in the Food Labeling Standards and any of the following will be labeled, 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 labeled based on the

individual provisions.

<<Example 1: A case of using imported concentrated apple juice>>

Name	Apple Juice (from concentrate)
Ingredients	Apples /Flavoring
Country of Origin for Ingredient	Germany, Hungary
Net	500ml
Expiration date	July 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 To 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 labeled in the names of ingredients column.

<<Example 2: A case of using concentrated apple juice which is imported and juice which is squeezed at the own company>>

Name	Apple Juice (from concentrate)
Ingredients	Apples /Flavoring
Country of Origin for Ingredient	Produced in Germany (Apple Juice), Domestic (Apples)
Net	500ml
Expiration date	July 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

- 3 Without adding an itemized column, the country of origin can be labeled in the ingredients column by placing the brackets after the name of the ingredient, which corresponds to the said name of the ingredient.

In this case, the name of ingredient corresponding to the state, for which the ingredient was used, cannot also be labeled as the ingredient (for example, labeling such as “Ingredients: Apples (Apple juice (Produced in

XX)").

<<Example 3: A case of using imported concentrated apple juice>>

Name	Apple Juice (from concentrate)
Ingredients	Apples (Germany, Hungary) /Flavoring
Net	500ml
Expiration date	July 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

20 What are the labeling requirements for processed food products for professional use in relation to the country of origin labeling for ingredients?

1 For any products sold to consumers, in order to properly label countries of origin for ingredients, it is mandatory to appropriately communicate information 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 labeling of countries of origin for ingredients of the final products, have no mandatory labeling requirements.

2 In order to ensure the accuracy of the country of origin labeling for ingredients of the final products, the following must be labeled:

- ① Countries of origin for the processed food product for professional use, if the said processed food product for professional use is used in the final product as an ingredient (the most predominant ingredient by weight in the final product) subject to the mandatory production country labeling
- ② Countries of origin for the ingredient (the most predominant ingredient by weight in the processed food product for professional use) subject to the mandatory labeling for the country of origin for the ingredient in the final product, if the said processed food product for professional use within the processed food other than imported products will be a final product by simple cutting or subdivision, etc., which are not considered as "production"

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 labeling for ingredients since they were bought for the purpose of ① above have been sold for general consumers at a supermarket for professional use, this will be a violation of the Food Labeling Standards.

4 If there is an agreement between food businesses and the products have the country of origin labeling for ingredients by tracing back to perishable foods, the labeling of ① or ② above is not required since this does not affect the labeling 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 modifying their natural state after being imported, the country of origin labeling for the said processed food products for professional use is required since it is required to label the country of origin as an imported product in the final product. (See “Processing - 153, 154 of Q&A of the Food Labeling Standards”)

21 How do we label <1> the country of origin and <2> the country of origin for ingredients for processed food products for professional use?

<1> Country of Origin Labeling

- 1 Please label (communicate information) the country of origin.
- 2 In this case, if the “production country labeling for semi-processed ingredients” for processed foods for general use is "expected to be labeled as domestically produced," it is required to have a label "indicating that it is domestically produced" as production country information. The labeling of "domestically produced" or "made in Japan" can be acceptable in addition to "domestic" so long as it is not misleading to producers, etc. of processed foods for general use so that the country of origin is known.

<2> Country of Origin Labeling for Ingredients

- 1 This is the same labeling 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 labeled (communicated the information). In the case of domestically produced products, in addition to the labeling noting that they are domestically produced, the following names of places can be labeled.

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 labeled with the name of the country of origin.
 - 3 In the case of 2 or more countries of origin, the order by greatest weight in the ingredient should be clearly labeled. If the percentages are labeled so that the order by greatest weight is evident, labeling the order by greatest weight is not necessarily required.
 - 4 If the said ingredient is a semi-processed ingredient, the labeling of a production country (label as “Produced in XX”) is required.
 - 5 It is permissible to label as “Others” “Country A or Country B” or “Import” for the country of origin labeling for the ingredient in a final product, if such labeling for the specific supplying country is clearly agreed contractually, etc. between the businesses. However, if such labeling is not clearly agreed, this is not permitted as the appropriate labeling.

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

- 1 Countries of origin and countries of origin for ingredients, when trading processed food products for professional use, can be labeled not only on the container or package but also in invoices, delivery statements, etc., or specifications, etc.
- 2 In the case of labeling them in specifications, etc., it is necessary to be able to refer that the shipped and delivered products are based on which specifications, etc., in the container or package, invoices or delivery statements, etc.
- 3 As noted in the above, it is permitted to specify the mandatory labeling 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, Paragraph 1, Item (ii) of the Food Labeling Standards are required to label the container or package, thus, these provisions must be followed for labeling.

23 What are the labeling requirements for perishable food for professional use in relation to the country of origin labeling for ingredients?

1 In order to ensure the accuracy of the country of origin labeling for ingredients within 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 labeling of a country of origin for an ingredient.

If the perishable food for professional use will be used in the final product as an ingredient, whose country of origin is not required to be labeled, the above labeling can be omitted.

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

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

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

- 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 labeled with the country of origin.

3 In the case of 2 or more countries of origin, the order by greatest weight in the ingredient should be clearly labeled. If the percentages are labeled so that the order by greatest weight is evident, labeling the order by greatest weight is not necessarily required.

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

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

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

- 1 For the purpose of providing information to consumers, “Nori for Rice Balls” is individually subject to the country of origin labeling for ingredients. “Rice Balls” in this case includes anything that consumers generally recognize as rice balls 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 a convenience store, etc.
- 2 The following products are not in the scope of the requirements.
 - ① Products that are packed with “side dishes” such as fried food in a container or package.
 - ② Rolled products rolling fillings with vinegared rice, which is categorized as sushi.
- 3 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 such requirement. This is the same condition as applied to other products subject to the country of origin labeling for ingredients.
- 4 For rice balls, the country of origin labeling 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).

Labeling supplying countries in descending order by weight is required and the possible suppliers labeling and all inclusive labeling are not permitted.

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

the Act on Information Records on Transactions, etc. and Relay of Information on Origin of Rice, etc. (Rice Traceability Act).

27 In the case of voluntary labeling ingredients of products, where the country of origin labeling for ingredients is not required, how shall we label them on the container or package?

- 1 Countries of origin for the greatest ingredient by weight in the ingredients (the most predominant ingredient by weight) are only subject to mandatory labeling of the country of origin for ingredients for processed food. It is, however, desirable to voluntarily label countries of origin for the second or third greatest ingredients by weight.
- 2 In the case of the voluntary country of origin labeling for ingredients, labeling 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 "possible suppliers labeling," "all inclusive labeling" or "production country labeling for semi-processed ingredients" can be utilized under certain conditions, which have been permitted for the mandatory labeling.
- 3 Even when labeling voluntarily, if there is any conflict with the laws relating to labeling such as the Food Labeling Act, such labeling is subject to supervision and penalties. Please label as clearly as possible based on the facts.

28 Is it ok to voluntarily provide information regarding the countries of origin for ingredients on websites, etc.?

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

29 What are the transitional measures applied for the expansion of the country of origin labeling for ingredients for all processed foods?

- 1 There will be a period for transitional measures, which will allow promotion to raise consumer awareness and preparation for switching labeling by businesses.
- 2 The period for transitional measures will be from the effective date of the Amended Food Labeling Standards (MM DD, 2017) until the end of March 2020. Any processed foods for general use produced during this period can be labeled in accordance with the provisions set either before or after the Amended Act.

Any processed foods for professional use with labels under the Food Labeling Standards before the amendment cannot be sold after the period for transitional measures. Once any of the following arrangement has been completed, those foods are allowed to be sold after the period for transitional measures.

- ① If labeled on the container or package of the food, the labeling that meets the requirements under the Amended Food Labeling 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 Labeling Standards are submitted to the distributor after collecting (or making arrangement to dispose of) old specifications, etc.
(See “Supplementary Provision -4 of the Food Labeling Standards”)
(The same expiration date as the period for transitional measures set for the Food Labeling Standards, which has been enacted in 2015.)

- 2 The labeling can be switched to the labeling compatible with the new labeling requirements for the country of origin for ingredients after the effective date of the Amended Act, without waiting until April 2020. Please plan ahead so that the transition will be completed within the period for transitional measures.

30 How do you plan to work on public awareness for consumers on the introduction of this new country of origin labeling for ingredients?

The system for the country of origin labeling for ingredients for processed food has been significantly changed this time. There are some new labeling methods such as the “possible suppliers labeling” in addition to the labeling 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 labeling methods.

It is expected that the same named products with the country of origin labeling for ingredients as the “labeling of supplying countries in descending order by weight,” “possible suppliers labeling,” “all inclusive labeling” and “production country labeling” 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 labeling. It is expected that 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 labeling of “supplying countries in descending order by weight” as a general rule. It is also expected that consumers would self-study this new system for the country of origin labeling for ingredients for processed foods so that consumers themselves can improve their food labeling literacy.

(Envisaged Specific Activities)

- Create brochures/leaflets for consumers and businesses
- Disseminate the intention for the system review through various governmental public relation media
- Disseminate and promote public awareness of the new system by sending speakers to various study groups hosted by consumer groups, etc.
- Promote nation-wide public awareness by sending speakers to seminars requested by prefectural governments
- Hold training sessions, etc. for prefectural government officials in order to promote public awareness activities by local governments
- Hold nation-wide information sessions on the Amended Food Labeling Standards in order to disseminate and promote public awareness at the national level