

Annex 6f Guidance on additives allowed in fishery products intended for export to Japan

This document is prepared for guidance by July 2018. For regulatory purposes consult also the original legal documents.

The Japanese Ministry of Health and Welfare have established regulations regarding the approval and use of additives. <https://www.mhlw.go.jp/english/topics/foodsafety/foodadditives/index.html>

The information on additives in products intended for export to Japan is published on <http://www.ffcr.or.jp/en/tenka/index.html>

Approved additives are assigned to different groups which are:

- 1) *Designated Additives* – meaning those designated by the Minister of Health, Labour and Welfare as substances that are unlikely to harm human health based on Article 10 of the FSA.
- 2) *Existing food additives* – meaning certain substances that are permitted for use and distribution in Japan, as exception, for the reason that they are widely used in Japan and have a long history of consumption by humans.
- 3) *Additives with standards for use* – specified additives with limitation of use for different specified products
- 4) *Other food additives:*
 - a. *“natural flavouring agents”* - These substances are natural products that are obtained from animals and plants and used for flavouring food.(e.g., vanilla flavouring and crab flavouring). The amount used is generally very little.
 - b. *“ordinary foods used as food additives.”* - They are substance that are generally provided for eating or drinking as food and also used as food additives (e.g., strawberry juice and agar).

Additives which are not on one of the above mentioned lists are not allowed to products intended for export to Japan.

Additives with standard for use can be seen on this link

<http://www.ffcr.or.jp/en/upload/Standards%20for%20Use%202017%20june%2023%20Ver2.pdf>

and a summary for fishery products are in the table below.

Additive	Product	Maximum Limit	Comment
BHA (Butylated Hydroxyanisole)	Fish & shellfish (dried) Fish & shellfish (salted) Fish & shellfish (frozen, except frozen products consumed raw?)	0,2g/kg 0,2g/kg 1 g/kg of dip	When BHA is used in combination with BHT, the total amount of both shall not exceed the corresponding limit.
BHA (Butylated Hydroxytoluene)	Fish & shellfish (dried) Fish & shellfish (salted) Fish & shellfish (frozen, except frozen products consumed raw?)	0,2g/kg 0,2g/kg 1 g/kg of dip	When BHT is used in combination with BHA, the total amount of both shall not exceed the corresponding limit.
Erythroic Acid	Fish paste products (excludingSURIMI)		Not permitted for nutritive purposes in fish paste products (only for antioxidative purposes)
Sodium Erythorbate	Fish paste products (excludingSURIMI)		Not permitted for nutritive purposes in fish paste products (only for antioxidative purposes)
Sodium Nitrite	Fish ham Fish sausages	0.05g/kg 0.05g/kg as maximum residue limit of nitrite	
Nicotinamide Nicotinic Acid			Not permitted in freshfish/shellfish (including freshwhale meat) or meat.
Canthaxanthin	Fish-paste products (only Kamaboko)	0.035g/kg	except for Hanpen,,Satumaage,Tuna-ham,Fish sausageand These imitations.
Copper Chlorophyll	Fish-paste products (excludingSURIMI)	0.03g/kg	
Sodium Copper Chlorophyllin	Fish-paste products (excludingSURIMI)	0.04g/kg	
Sodium Chondroitin Sulfate	Fish sausage	3.0g/kg	
Sodium Saccharin	Fish/shellfish (processed, excluding fish paste, TSUKUDANI (foods	1.2g/kg	

	boiled down with soy sauce), pickles, and canned or bottled foods) Fish paste	0.3g/kg	
Calcium sorbate	Dried fish/shellfish (excluding smoking cuttlefish & octopus) Fish-paste products (excluding SURIMI) Smoked cuttlefish and Octopus	1.0 g/kg 2.0g/kg 1.5g/kg	
Sorbic Acid	Dried fish/shellfish (excluding smoking cuttlefish & octopus) Fish-paste products (excluding SURIMI) Smoked cuttlefish and Octopus	1.0g/kg 2.0g/kg 1.5g/kg	
Propylene Glycol	Smoked cuttlefish	2%	
Chlorous Acid Water	Seaweeds Fresh fish/ shellfish (including fresh whale meat)	0.40g/kg dipping solution or spray liquid	Shall be removed or decomposed before the preparation of the finished product
Isopropanol	Fish meat	0.25g/kg Fish protein concentrate	Fish protein concentrate is fish meat from which the moisture and fat are removed.

Be aware that:

- Potassium Pyrosulfite (Potassium Hydrogen Sulfite or Potassium Metabisulfite)
- Sodium Hydrosulfite (Hydrosulfite) and
- Sulfur Dioxide (Sulfurous Acid, Anhydride)

are listed as “Designated Additives” as of October 2016