

How Are Colorants for Food Packaging Regulated in Japan?

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I understand that the Japan MHLW Notification No. 196 includes a positive list of substances used in synthetic resins used in food contact materials/articles. Colorants are not listed on this list, so are the JHOSPA approvals still the most relevant approvals for colorants used in food contact materials in Japan?

Answer

The new Positive List (PL) system does not change the way Japan regulates colorants for food-contact uses in Japan. Before and after the PL system took effect on June 1, 2020, only chemically synthesized colorants that are either designated additives or are not expected to migrate to food, in accordance with MHLW Notification No. 370, may be used in food-contact utensils, containers and packaging (UCP).

As MHLW Notification No. 370 did not provide a positive list of permitted colorants, the certificates issued by Japan Hygienic Olefin and Styrene Plastics Association (JHOSPA) for food-contact colorants have historically been used to demonstrate compliance under specified use conditions and may continue to be cited in support of the compliance status of such colorants for use in food contact products. However, it should be noted that, as of April of this year, the Food Contact Materials Safety Center within the Japan Chemical Innovation and Inspection Institute ([JCII](#)) has assumed the hygiene-related business of JHOSPA, The Japan Hygienic PVC Association (JHPA), and The Japan Hygienic Association of Vinylidene Chloride (JHAVDC). Accordingly, JCII is expected to continue to issue confirmation certificates for products that meet the JHOSPA voluntary standard. Additional details are available on the JCII website in Japanese ([here](#)).

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